

## LONDON BOROUGH OF WALTHAM FOREST

Committee / Date:	Planning: 8 <sup>th</sup> May 2012
Application reference:	2011/0907/LB
Applicant:	London and Quadrant Housing Association
Location:	Walthamstow Greyhound Stadium, 300 Chingford Road, Chingford, London E4
Proposed development:	Demolition of curtilage Listed Buildings, south-west spectator stand and part of popular entrance, conversion, alterations and extensions to the main Tote building for leisure use and conversion and alteration to eastern Tote and kennels for community allotment use. New build residential accommodation in buildings between 2 and 8 storeys in height, comprising 294 dwellings [50 houses and 244 flats, including 1, 2, 3, & 4 bedroom units and a mix of private and affordable housing]. New buildings for use as a children's nursery, cafe and creche, open space provision [public, private and communal], car, motorcycle and bicycle parking and vehicular access through existing Chingford Road entrance. Associated alterations and landscaping including alterations to public right of way [ <b>Application for Listed Building Consent</b> ].
Wards affected:	Larkswood
Appendices:	Appendix 1: Listed Building Descriptions

### 1 RECOMMENDATION

- 1.1 That listed building consent is **GRANTED** subject to conditions and approval by the Department of Communities and Local Government [DCLG].

### 2 SUMMARY OF REASONS FOR RECOMMENDATION

- 2.1 In considering whether to grant listed building consent the Council must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Council has assessed these proposals in the light of this requirement and has concluded that the proposed works can be justified.
- 2.2 The proposal has been considered against Policies CS12 and CS15 of the LBWF LP Core Strategy [2012] and Policies 3.5, 7.2, 7.3, 7.4, 7.6 and 7.8 of the London Plan [Jul 2011].
- 2.3 The following considerations have also been taken into account:

2.4 The National Planning Policy Framework [2012] which advises that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

2.4.1 Emerging Policies in the LBWF LP Draft Development Management Policies [Jan 2011].

2.4.2 The following issues:

- The impact of the proposal on the listed buildings; and
- The desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- Comments received in response to publicity and consultation.

2.5 Subject to referral to DCLG for approval, the application for listed building consent can be recommended for approval

### **3 REASONS REFERRED TO COMMITTEE**

- Major matters of planning policy are involved.
- There is significant public interest.
- The matter is considered to be contentious or controversial.

### **4 DETAILS OF PROPOSAL AND SURROUNDINGS**

#### Location and Accessibility

4.1 The site is situated at 300 Chingford Road, London E4 and lies approximately 2km to the north of Walthamstow town centre and its associated facilities and public transport interchange. The site is located immediately to the north of the Crooked Billet Roundabout, which provides access to the A406 North Circular Road and Chingford Road.

4.2 The site can be accessed by road and is served by a network of bus services. The nearest bus stops are situated along the site frontage on Chingford Road and the route into Walthamstow town centre takes approximately ten minutes during off-peak hours.

- 4.3 The nearest mainline rail service is at Highams Park Station, located approximately 1.2 km to the north-east of the site. The nearest underground station is Walthamstow Central, sited approximately 2km to the south or which can be accessed two stops from Highams Park Station.
- 4.4 The site has a Public Transport Accessibility Level [PTAL] of 2-3, which represents an average level of accessibility.
- 4.5 The site is situated adjacent to a designated cycle route, which runs along Chingford Road and crosses the Crooked Billet Roundabout using a subway and bridges. On-street cycle lanes along Chingford Road provide access to Walthamstow town centre. An off-road cycle path runs along the southern boundary of the site and provides a connection to Highams Park Station.
- 4.6 There is currently no pedestrian access through the site, although there is an existing pedestrian and cycle route footpath, which provides a link from Empress Avenue, running along the southern boundary of the application site towards Highams Park.

#### Surrounding Area

- 4.7 The area around the site contains a various land uses buildings type. Immediately to the north and south of the site are the residential properties of Rushcroft Road and Empress Avenue, which comprise two-storey, terraced dwellings with a consistent building line to the street frontages and modest-sized rear gardens. The properties on the south side of Rushcroft Road and the north side of Empress Avenue have gardens, which back directly onto the subject site. The ground level of these houses are greater than the rear gardens and that of the subject site with steps required to access the garden level of those residential properties.
- 4.8 There are no parking controls on these residential streets or the surrounding area, although a Controlled Parking Zone [CPZ] was previously in place when the greyhound stadium was in use on event days.
- 4.9 To the west of the site, on the opposite side of Chingford Road, is a Sainsbury's retail store with associated car parking and a petrol filling station to the frontage. Also within this site is a four-storey Holiday Inn hotel.
- 4.10 To the east of the site is Rush Croft Sports College, accessed via Rushcroft Road. To the south-east of the site are the playing fields of the Hale End Sports Ground.
- 4.11 The former greyhound stadium car park, which is located on the west side of Chingford Road opposite the subject site was disposed of separately from the greyhound stadium and does not form part of the application site. Planning applications for the car park site are currently under consideration by the Local Planning Authority as follows:
  - **Ref: 2011/0275:** Erection of vehicle showroom, retail parts distribution centre, vehicle workshops and valet servicing / MOT

facilities with associated landscaping, new access from Walthamstow Avenue and closure of access opposite Empress Avenue [Registered 10<sup>th</sup> March 2011].

- **Ref: 2011/0278:** Use of rear half of site for Coach / Bus depot for 64 buses / coaches and 38 mini buses with associated, plant storage facility, ancillary office and associated landscaping and formation of access from Walthamstow Avenue Roundabout [Registered 11<sup>th</sup> March 2011].

- 4.12 Green space exists to the east of the site, most of which is for school pitches and private sports grounds. The nearest park to the site is Kitchener Road Park, located to the south of the A406 North Circular Road and within a 400m catchment from the subject site. However, lack of pedestrian access across the A406 North Circular Road makes the distance considerably greater.
- 4.13 For outdoor sports facilities, the Peter May Sports Centre [formerly known as Wadham Lodge Sports Centre] is located to the east and, together with Hale End Sports Ground and Parmiters and Cavendish Sports Grounds [Nelson Road], provide accessible sports facilities.
- 4.14 The River Ching provides an ecological corridor, running east to west and linking the Lea Valley with Epping Forest. The river runs in a culvert as it crosses the subject site.

#### The Site

- 4.15 The main frontage of the site is to Chingford Road and is dominated by the Tote building, which is visible from the A406 North Circular Road. This frontage building, with its neon lighting to the road aspect, and the Tote board facing into the site, are Grade II listed. The Tote building is considered to be the equivalent of between five and six residential storeys in height.
- 4.16 Attached to the base of the Tote building are a number of lower structures, which comprise a two-storey car park, the south / west spectator stand and a number of modern and unsympathetic extensions. The green space on Chingford Road at the base of the frontage range is outside of the applicant's ownership.
- 4.17 To the east part of the site are the Grade II listed dog kennels. The kennels are positioned adjacent to the eastern curve of the greyhound track and are single-storey in height with the two end pavilions rising to the equivalent of two storeys.
- 4.18 The greyhound track is raised with the inner part sunk at a lower level. This central space has been under-used by virtue of its enclosure by the race track. Having regard to the location of the south spectator stands and the culvert of the River Ching, there is currently a blank boundary onto the River Ching corridor pedestrian and cycle route which runs to the south of the site from Empress Avenue towards Highams Park.
- 4.19 Spectator stands are positioned adjacent to the north and south 'straights' of the greyhound track. These are the equivalent of between

two-to-five residential storeys in height. The north spectator stand is positioned in part at the shared boundary with the rear gardens of Rushcroft Road properties. The south spectator stand is positioned close to the rear boundaries of the Empress Avenue properties, where these houses benefit from more extensive rear gardens.

- 4.20 The site has three vehicular access points. The main access fronts Chingford Road at the north-west part of the site. There is also an access at the south-west end of the Chingford Road frontage and an access into the site at the eastern end of Rushcroft Road. There are two further, but inactive, access points along Rushcroft Road.

#### The Listed Buildings

- 4.21 The Listed Buildings comprise the entrance Tote building, and the kennels referred to in paragraph 4.17 above. A copy of the listed buildings description from the English Heritage register is attached to this document as Appendix 1.

- 4.22 The Council considers their particular significance to be due to:
- The distinctive nature of the Tote building generally and in particular the iconic status of the greyhound façade, particularly when lit;
  - The significance of the kennels as an integral part of the first phase of construction, as mentioned in the list description; and
  - The historic interest of the stadium as mentioned in the list description: “the best surviving and most celebrated Inter-War greyhound stadium, a nationally loved building type expressive of developments in Inter-War mass culture and entertainment.”

#### The Proposal

- 4.23 The proposal was revised in December 2011 following the original submission in July 2011, and in response to issues raised during the consultation process.

- 4.24 The key differences in the revised proposals are as follows:
1. The overall provision of residential accommodation is reduced from 301 units to 294 units.
  2. The density of the proposed development is reduced from 329 to 316 Habitable Rooms per Hectare.
  3. The children's nursery adjacent to the site entrance has been remodelled in order to reduce its height and massing and to improve the overall relationship with adjoining properties. The re-designed nursery will be one storey in height where closest to the Chingford Road frontage and will rise to a maximum of two storeys only at the point where the existing grandstands are positioned.
  4. The scale and height of the built form adjacent at the western end of the central blocks has been lowered in order to reduce any disruption to the silhouette of the main Tote board when viewed from both inside and outside of the site. This is achieved by a

reduction in the height of Block FGH and Block IJK from five storeys to four storeys.

5. In order to reduce its overall length and mass, a visual break has been incorporated into the northern central block [Block FGH]. This break takes the form of a 6m-wide void at second, third and fourth floor levels and is designed to mirror the void proposed in the southern central block [Block IJK]. Enhancements to the glazing to the central core to Block IJK are now proposed to maximise transparency and to allow more light to permeate to the courtyard garden.
  6. The height of Block OPQ is lowered on its western periphery from seven storeys to five storeys in order to allow for a more gradual transition to the more domestic height of the adjoining houses.
  7. The rear elevation to the proposed houses in Block BCD has been re-modelled to minimise the potential for overlooking to the rear gardens of the properties in Rushcroft Road. This is achieved through the incorporation of angled windows and obscured glazing to all upper floors of the northern terrace block.
  8. The design of the two proposed family houses in Rushcroft Road has been revised to more closely reflect the surrounding vernacular and the proposed dormer windows to the front elevation have been removed.
  9. In order to protect the amenity of prospective residents, and to prevent direct overlooking of adjoining rear gardens, two of the units in Block LMN are provided with angled windows. Angled glazing is also proposed for the units on the eastern flank of Block OPQ to prevent overlooking towards Block R.
- 4.25 An updated leisure offer also formed part of the revised scheme as follows:
1. The creation of a 'Stadium trail' incorporating a sprint circuit around the greyhound track, and extending beyond the confines of the site to create trails linking to other local spaces in the vicinity of the site and extending to the Lee Valley and Epping Forest. The Stadium trial will include way-finding to maximise its use and accessibility and will incorporate elements of an outdoor gym and/or 'trim trail'. The proposed layout of the site retains important references to the former greyhound use.
  2. Improved links through the informal open space to the south-east of the site to create an enhanced connection to the Pool and Track facility on Chingford Road and to which financial contributions towards enhanced facilities are proposed.
  3. The provision of a climbing wall within the main Tote building. This will provide a dramatic feature to this historic space and will enhance the range of facilities within the new Stadium Sports Centre.

4. The creation of a skateboard park on the upper deck of the Tote car park to complement the activities envisaged for the new sports centre and to enhance visible activity from the street frontage. This facility could be brought forward at an early stage in the redevelopment programme as an immediate community benefit. Advice has been sought on the safety implications of the proposed use and details are provided within the supporting documents.
  5. As well as funding the capital costs required to deliver the enhanced sport and leisure offer outlined above, L&Q is proposing that a further fund of £250,000 be donated to the Community Sports Trust to help support the on-going operation of the Stadium Sports Centre. This fund will assist in staging specific community events linked to the existing and enhanced sport and leisure offer.
  6. In recognition of the fact that the previous use of the site has historically provided a borough-wide leisure facility, a s106 contribution of £1,750,000 is being put forward towards improvements to existing off-site leisure facilities to help increase participation in sport and physical activity within the Borough. The proposed contribution will allow for the range of improvements identified by the Borough to be carried out in full. The improvements include refurbishment of the athletics track, a new soft play area for children and a gym.
- 4.26 The proposal for determination is for a mixed-use development with key elements of the scheme including:
- 4.27 The demolition of the existing buildings and structures on the site with the exception of the Grade II listed Tote and kennels. The main Tote building will be restored and extended to provide a multi-functional community sports centre together with a juice bar. There will be a new landscaped plaza to the front of the Tote to promote community interaction and enhance the setting of the listed building. In the eastern section of the site, the Grade II listed kennels are to be adapted as stores / potting sheds in connection with the use of new pocket allotments.
- 4.28 Residential Accommodation:
- The housing will be arranged in a new urban form as four linear blocks of residential buildings with a row of mews-style properties in the north-east corner of the site. Building heights in the northern terrace block and the two central blocks will range from between two and five storeys [rising towards the centre of the site]. Within the southern blocks, building heights will be three storeys in height where adjacent to existing residential properties, rising to eight storeys in the south-east corner of the site.
- 4.29 The provision of 274 car parking spaces. A range of parking solutions are proposed including on-street parking on private roads within the site, undercroft parking [under the raised landscape amenity space] and parking within and adjacent to the Tote building:

- Leisure Centre: 45 spaces [ten surface parking and 35 in the lower car park deck];
- Nursery: 8 surface parking spaces;
- Residential: 211 spaces [119 surface parking and 92 undercroft];
- Residential Visitor: 7 surface parking spaces; and
- Car Club: 2 surface parking spaces.

4.30 Other key works and uses are as follows:

- The provision of new leisure uses incorporating a climbing wall, a BMX / skateboard area and gym facilities.
- A children's nursery, café and crèche.
- A variety of new open spaces including a plaza in front of the main Tote building, an elevated communal garden and natural open space connecting to land beyond the Grade II listed kennels to the east.
- It was proposed that the River Ching be de-culverted to improve the green route for the wider public however, since has transpired that it is now not proposed in accordance with advice from the Environment Agency.
- References to the memories of the racetrack are reinforced through the design of the built form and the landscaping.
- The retention of the main access route from Chingford Road as the principal entrance. Enhanced connectivity to be provided across the site for pedestrians and cyclists enhancing links to adjoining green spaces and facilities.
- The provision of Combined Heat and Power [CHP] to promote energy efficiency and low carbon usage in the new development.

## 5 SUPPORTING DOCUMENTS

5.1 A list of supporting documents submitted with the jointly submitted main and listed building consent applications is set out below. Members should note that this includes a heritage assessment submitted with the original applications and a revision to that assessment submitted in December 2011:

### Original 301-Unit Scheme

- Planning and Regeneration Statement by AKA Planning [June 2011];
- Daylight and Sunlight Report by Calford Seaden [June 2011];
- Landscape, Biodiversity and Open Space Strategy by Liz Lake Associates [April 2011];



- Landscape Drawings by Liz Lake Associates [May 2011]:
  - 1270 01 Rev B Planting Strategy Plan
  - 1270.01 Ching River Improvements
  - 1270.09 Public Node / River Ching
  - 1270/11 Rev C Hard Landscape Masterplan
  - 1270.12 Visualisation of Courtyard Gardens
  - 1270.13 Soft Landscape Masterplan
  - 1270.14 Eastern Play Area
  - 1270.15 Public Node / River Ching
  - 1270.16 Play Design;
- Ecological Assessment by Eco Planning UK Ltd for and on behalf of Liz Lake Associates [January 2011];
- Arboricultural Report by Eco Planning UK Ltd for and on behalf of Liz Lake Associates [February 2011];
- Environmental Noise Survey and PPG24 Assessment by Hann Tucker Associates [June 2011];
- Energy Efficiency Statement and Sustainability Strategy by Calford Seaden [June 2011];
- Foul and Surface Water Sewerage and Utilities Statement [June 2011];
- Site Waste Management Report by Quadrant Construction [June 2011];
- Method Statement for Demolition by Quadrant Construction [June 2011];
- Transport Assessment by Transport Planning Practice [June 2011];
- Contaminated Land Survey by MLM Consulting Engineers Ltd [June 2011];
- Heritage Statement by Montague Evans [June 2011];
- Archaeological Desk Based Assessment by CgMs Consulting [June 2011];
- Air Quality Screening Assessment for Walthamstow Stadium Site, London by Matthew Whitman [June 2011];
- Flood Risk Assessment by MLM Consulting Engineers Ltd [June 2011];
- Statement of Community Engagement by AKA Planning [June 2011];
- Sporting and Business Case by RAE Sport and Leisure Consultants [June 2011];

- Methodology Statement: Development Viability Assessment by Jones Lang LaSalle [June 2011];
- Schedule of Works to Listed Buildings by Martin Associates [June 2011];
- Structural Investigation Report by Knapp Hicks [June 2011]; and
- Heritage Assessment by Montague Evans [June 2011].

#### Revised 294-Unit Scheme

- Planning and Regeneration Statement by AKA Planning [December 2011];
- Addendum Report to Design and Access Statement by Conran + Partners [December 2011];
- Addendum to Transport Assessment by Transport Planning Practice [December 2011];
- Daylight and Sunlight Report by Calford Seaden [December 2011];
- Landscape, Biodiversity and Open Space Strategy by Liz Lake Associates [December 2011];
- Ecological Assessment by [Revision 1] by Liz Lake Associates [December 2011];
- Bat Survey by Liz Lake Associates [December 2011];
- Revised Heritage Statement by Montague Evans [December 2011];
- Addendum to Energy Strategy by Calford Seaden [December 2011];
- Addendum to Sporting and Leisure Business Case by RAE Sport and Leisure Consultants [December 2011];
- EIA Screening Request by AKA Planning [December 2011];
- Response to London Plan July 2011 Chapter 5 by Calford Seaden [December 2011];
- Addendum Report 2 To Design & Access Statement by Conran + Partners [April 2012];
- Flood Risk Assessment by MLM Consulting Engineers Ltd [April 2012];
- Landscape, Biodiversity and Open Space Strategy UPDATE by Liz Lake Associates [2012]; and
- Landscape Drawings by Liz Lake Associates [April 2012]:
  - 1270/11 Rev E Hard Landscape Masterplan
  - 1270.13 Rev B Soft Landscape Masterplan.

## **6 RELEVANT SITE HISTORY**

- 6.1 Following a request to spot-list the buildings at the Stadium, the kennels [built 1933] and attached secondary Tote board [1935], the main Tote board [1935], the west spectator stand [1936] and the two-storey car park [1936] were identified as having special interest. As a consequence, on 23<sup>rd</sup> May 2007, the entrance range comprising the Tote board, the west spectator stand and car park, and the kennels were listed Grade II.
- 6.2 In September 2010, a request was made to English Heritage by a third party to consider spot-listing the spectator stands at the Stadium. Following consideration of the information put forward, English Heritage determined that the spectator stands were not of special interest in terms of technological innovation and due to the extent of their alterations. The request was rejected.

## **7 CONSULTATIONS AND REPRESENTATIONS**

- 7.1 Neighbour notification was carried out in relation to the following residential addresses:

**Chingford Road:** Car Park site [300], Christ of Church the King [455]

**Empress Avenue:** 1-48 [inc]

**Empress Parade, Chingford Road:** 2-42 [even], 14A, 42A

**Fairview Villas, Ascham Drive:** 5-12 [inc]

**Fairview Villas, Chingford Road:** 1-4 [inc]

**Loxham Road:** 1-5 [inc], 7, 9, 10-23 [inc], 24-40 [even]

**Minerva Road:** 1-12 [inc], 11A, 14, 15, 16

**Grove Park Avenue:** 2-56 [even]

**Nelson Road:** 1-100 [inc], 51A, Groundsman's Flat & Pavilion  
Parmiters Sports Ground

**Rowden Park Gardens:** 20-38 [inc]

**Rowden Road:** 1-52 [inc]

**Rushcroft Road:** 1-24, School House [26], 27-51 [odd], Rush Croft  
Sports College [57]

**Salisbury Hall Gardens, Chingford Road:** 30-61 [inc]

**Wadham Avenue:** 1-86 [inc]

**Walthamstow Avenue:** 1, 3, Holiday Inn [5], 11

**Wadham Avenue:** 1-86 [inc]

**Wadham Road:** Peter May Sports Centre [135], Wadham Lodge  
Sports Ground, The Hale End Road Sports Ground [99]

301 Unit Scheme [July 2011]

7.2 Consultation was carried in relation to the original scheme on 13<sup>th</sup> July 2011 with notification letters sent to residents as detailed above informing them of the original scheme proposals. The application was published in the Waltham Forest Guardian on 25<sup>th</sup> July 2011 and ten site notices were displayed around the site on 25<sup>th</sup> July 2011.

7.3 **Consultation Summary (relevant to both the main and this listed building application)** : Petition with 115 signatories and a total of 1,005 representations received, objecting to the proposal on the following grounds:

- Scheme is not viable;
- Loss of employment;
- Loss of iconic greyhound / leisure facility;
- Increase in traffic congestion and off-site parking;
- Overdevelopment;
- Lack of social infrastructure provision including doctors, schools, dentists, hospitals, etc;
- Design / scale / visual impact;
- Loss of heritage / identity;
- Demolition of listed buildings and impact;
- Insufficient parking provision;
- Loss of identity;
- Increase in criminal activity;
- Loss of outlook;
- Loss of privacy;
- Increase in criminal activity;
- Loss of access to Selwyn School during construction;
- Site should retain recreational use; and
- Should introduce greater community / leisure facilities, e.g. cinema, bowling alley.

7.4 Of the 1,005 objections received, 210 representations were from 107 addresses [Empress Avenue, Fairview Villas, Nelson Road, Wadham Road, Salisbury Hall Gardens, Rushcroft Road, Grove Park Avenue, Loxham Road, Rowden Park Gardens, Empress Parade, Minerva Road, Ascham Drive, Rowden Road] objecting to the proposal on the following grounds:

- Out of character;
- Environmental Health considerations: noise, health, vermin
- Loss of trees

- Loss of iconic greyhound / leisure facility;
- Increase in traffic congestion and off-site parking;
- Overdevelopment;
- Lack of social infrastructure provision including doctors, schools, dentists, hospitals, etc;
- Design / scale / visual impact;
- Loss of heritage / identity;
- Demolition of listed buildings and impact;
- Insufficient parking provision;
- Need to maintain wildlife habitat;
- Loss of daylight / sunlight;
- Loss of outlook;
- Loss of privacy / overlooking;
- Increase in criminal activity;
- Air / noise pollution [from CHP], litter, health concerns;
- Potential damage to residential properties during construction; and
- Concerns regarding creation of new accesses into the site, particularly at Empress Avenue and to the alleyway that could result in criminal activity.

7.5 171 representations were received supporting the proposal, particularly having regard to animal wellbeing and welfare and support for additional housing.

294 Unit [Revised] Scheme [December 2011]

7.6 Consultation was carried in relation to the original scheme on 3<sup>rd</sup> January 2011 with notification letters sent to residents as detailed above informing them of the revised scheme proposals. The application was published in the Waltham Forest News on 9<sup>th</sup> January 2012 and ten site notices were displayed around the site on 29<sup>th</sup> December 2011.

7.7 **Consultation Summary [relevant to the planning and listed building consent applications]:** 433 further neighbour representations have been received, with 412 objecting to the proposal, 18 in support and three providing comment. The number of representations received is confirmed below.

7.8 **23.01.12:** A residents meeting was co-ordinated by a local resident, which was held at Rush Croft Sports College. The purpose of the meeting was to provide an update to the proposal with regard to the design changes. Representatives from the Council attended the meeting and informed the residents of the key revisions to the scheme following submission in December 2011.

7.9 **24.01.12:** A petition with 107 signatories and 238 representations from 141 addresses was hand-delivered to the Authority objecting to the proposal on the following grounds:

- Loss of privacy / overlooking;
- Personal safety concern / increase in criminal activity;
- Design / scale / visual impact / eight-storey building;
- Out of character;
- Overdevelopment, exceeds the London Plan density;
- Environmental Health considerations: noise, health, vermin
- Increase in traffic congestion and off-site parking;
- Lack of social infrastructure provision including doctors, schools, dentists, hospitals, etc;
- Loss of heritage / iconic identity;
- Effect on listed buildings and impact / maintain listed buildings;
- Loss of red and white fencing / metalwork and lights at the front of the building as they form part of iconic frontage;
- Insufficient parking provision;
- Impact on biodiversity and wildlife habitat;
- Noise pollution, health concerns;
- Potential damage to residential properties during construction;
- Concerns regarding creation of new accesses into the site, particularly at Empress Avenue and to the alleyway that could result in criminal activity;
- Flawed documents / information supplied by the applicant;
- Lack of community engagement / consultation by the applicant;
- Proposed leisure facilities and BMX / skateboard park would attract gangs / graffiti / vandalism;
- Movement of bus stops;
- Location of substation;
- Access nearest to Empress Avenue opened up to traffic;
- Health and Safety in the event of a fire particularly with the eight-storey building / insufficient emergency exits; and
- No CCTV provision and Police base / office.

7.10 **29.02.12:** A further petition with 49 signatories and 104 representations from 75 addresses was hand-delivered to the Authority objecting to the proposal on grounds as above and additionally from local businesses:

- Loss of business / income;

- Traffic generation unacceptably detrimental;
  - On-site leisure facilities would take business away from similar established businesses in the area; and
  - Preserve heritage.
- 7.11 **Other Representations:** 18 separate representations received objecting to the proposal on the same grounds listed above.
- 7.12 **20.02.12:** Church of Christ the King, 455 Chingford Rd: Petition with 168 signatories objecting to the proposal on the following grounds:
- Access to and from the Church would be difficult;
  - Possible relocation of bus stop further away from the Church would reduce accessibility, particularly for the elderly;
  - Increase in traffic / congestion; and
  - Increase in crime resulting from underground car park.
- 7.13 **Individual Representations [Emails and Letters]:** 52 representations received objecting to the proposal on the following grounds:
- Scheme not viable;
  - Loss of employment;
  - Change of use / loss of greyhound facility;
  - Insufficient leisure offer and s106 contribution;
  - Impact on listed buildings;
  - Increase in crime;
  - Insufficient public consultation;
  - Inappropriate housing mix;
  - Density / overdevelopment / contrary to the London Plan;
  - Insufficient supplementary information following revisions to the scheme;
  - Insufficient local infrastructure provision including education;
  - Housing need can be accommodated without redevelopment of the site;
  - Affordable offer confusing;
  - Opposition from Stella Creasey MP and The Rt Hon Iain Duncan Smith MP;
  - Loss of public space;
  - Proposal would devalue neighbouring properties;
  - Overlooking / loss of privacy;
  - Loss of light;

- Effect on properties along Rushcroft Road in terms of the type of houses proposed on this street;
- Noise / smells / disturbance;
- Design;
- Increased traffic generation / congestion;
- Effect on utilities networks and neighbouring properties during construction;
- Cultural and heritage impact / Impact on listed buildings;
- Scale of use unacceptable;
- Insufficient number of family housing;
- Increase in flooding;
- Out of character;
- Cinema and bowling alley preferred as leisure offer;
- Leisure facilities should be accessible for all; and
- Employment required, not more housing.

18 representations received supporting the proposal on the following grounds:

- Housing need;
- Family leisure need;
- Greyhound use encourages gambling; and
- Cruelty to animals.

3 representations received neither objecting nor supporting the proposal raising the following issues:

- Traffic impact on the junction outside the stadium and the Crooked Billet roundabout.
- Ensure skateboard park does not become a magnet for undesirable elements of the community.
- Any development of the site should retain greyhound racing.

7.14 **Walthamstow Stadium Area Residents / Community Association:** Representation received on 20<sup>th</sup> March 2012 objecting to both the main and this listed building application and commenting on proposals as follows:

- Overlooking into Empress Avenue properties from the proposed development, particularly from the five to eight storey blocks.
- Loss of privacy.
- Increase in crime as a consequence of natural surveillance to existing residential properties.



- Mitigation measures to address overlooking into existing residential properties such as obscured glazing does not address the problem as windows can still be opened.
- Inaccurate drawings. The angles mean these properties and the ones next to them will see into properties on both sides of the road and directly into loft conversions and bedrooms of existing houses on the even side of Empress Avenue.
- Proposal would facilitate crime through increased permeability of the site. No requirement for the access into the site from Empress Avenue.
- Proposed trees would not provide screening.
- Residents will suffer from increased flooding in surrounding roads / gardens / properties.
- Concerns where the applicant wishes to use land, which is not in their ownership, particularly in relation to the side of 48 Empress Avenue.
- Hours of construction. Request for weekly construction works to be carried out on a fortnightly basis [one week on / one week off] as it would be subject to noise, dust, asbestos causing detriment to people's health and quality of living.
- Assurance that any dirt, dust and debris that enters the site will be cleared at the applicant's expense and not at the expense of the residents and that any damage done to properties / fences / boundaries, etc will be made good.

**Further representation made on 26<sup>th</sup> April 2012:**

- The applicant has not at any time consulted with local residents or invited local residents to comment on their revised planning applications, nor have they informed us of and then held any public meeting relating to their revised plans.
- As this is now before planning on 8th May it is unfair to local residents that a set design has still not been finalised.
- The further amendment to put obscured glazing to avoid direct overlooking is insufficient to prevent overlooking as windows have to have the facility to open thus the privacy issues remain.
- Angling of windows is insufficient to remove overlooking and privacy issues and may mean that although the privacy issues with an adjacent premises are reduced, there would be new privacy issues for the properties the windows are angled at.
- Balcony screening does not remove privacy issues. To correctly screen a balcony where people cannot overlook would mean the balcony would need to be fully blocked by obscured glass as people can stand on a chair etc.

- The issues raised on privacy, right to privacy, right a family life and other human right issues still remain valid and we wish to exercise those rights.
- Local residents do not want planning granted unless there is a scheme in place that meets the approval of the local residents that is a set scheme with set plans and a set design.
- The scheme as it is, remains confusing with so many options built in and items within documents that contradict each other that it is unfair to pass the application as it stands.
- Due to the time constraints we do not have the time or resources to go door to door obtaining signatures however from the objections already received you will be aware of the number of people who are concerned on privacy and overlooking issues.

### **Consultation**

- 7.15 **English Heritage:** This application for listed building consent [Ref: 2011/0907/LB] was submitted concurrently with the planning application [Ref: 2011/0898]. The main revisions to the listed building application for the Entrance Tote building involve the provision of a skateboarding and BMX leisure facility on the upper deck of the street frontage [a former car park deck] and the adaptation of the interior of the Tote for climbing walls. The position in relation to English Heritage is considered further in section 10 below
- 7.16 **CABE:** Supportive of the proposal.
- 7.17 **Sport England:** No formal objection.
- 7.18 **Crime Prevention Design Adviser:** Secured By Design to be incorporated into the proposal.
- 7.19 **Redbridge and Waltham Forest Primary Care Group:** No response received at the time of writing.
- 7.20 **GreenSpace:** No response received at the time of writing.
- 7.21 **Twentieth Century Society:** No response received at the time of writing.
- 7.22 **Georgian Group:** No response received at the time of writing.
- 7.23 **Council for British Archaeology:** No response received at the time of writing.
- 7.24 **Ancient Monuments Society:** No response received at the time of writing.
- 7.25 **Society for the Protection of Ancient Buildings:** No response received at the time of writing.
- 7.26 **Victorian Society:** No response received at the time of writing.
- 7.27 **Stella Creasey MP:** In summary, application should be refused on heritage and planning grounds. This application seeks not only to demolish listed buildings but also to permanently alter the use of this

site from its original intended purpose- the very purpose for which it was listed.

7.28 **The Rt Hon Iain Duncan Smith MP: [Note: Request for the following statement to be read aloud at the Planning Committee on 8<sup>th</sup> May 2012].**

- I urge the Council to reject Planning Application 2011/0898, which is L&Q's application to turn Walthamstow Stadium into a housing estate. I also urge the Council to consider the mounting evidence that L&Q's plans are not good value for money for the public purse. I especially note L&Q's own consultants, Jones Lang LaSalle, found that L&Q cannot afford to make any contributions towards Section 106 costs out of this site. This underlines the fact that L&Q stand to make a huge loss on this site.
- I would also encourage the Council to note the Mayor of London's recent statement of support for greyhound racing on this site and the fact that he has raised doubts about L&Q's plans. The Mayor of London said on 13th April [2012] that he was *"becoming more and more concerned about this planning proposal as more information comes to light, of which the failure to deculvert the river is just the latest"*. He also asked that the Council *"carry out robust local consultation so that all residents are clear what is proposed"* and states that he *"would welcome a user who was able to facilitate"* greyhound racing on the site.
- Walthamstow Stadium is an iconic feature of the local community and a heritage asset, as English Heritage has made so abundantly clear. The vast majority of my constituents and local residents want to see greyhound racing on this site and are opposed to L&Q's plans. I therefore urge the Council to consider the wishes of local residents and protect the interests of the local community.

7.29 **Save Our Stow:** Save Our Stow object to the both the main and this listed building application. The following text was submitted by Save Our Stow and represents a summary of the issues of objection to the revised scheme. Save Our Stow also submitted a 150 page objection in relation to the original scheme. It is understood that the current summary summarises their response to the original and the revised scheme. The bullet point format listed below highlights the main areas of objection from Save Our Stow. The Group state that these objections are backed up with evidence and supporting information as submitted to LBWF over the past year or so:

- The change of use is not appropriate and should be refused. The track was viable before it was closed in a contrived attempt to try to help justify a residential use via non-viability. There is a business plan that is current from Bob Morton to re-open the track. Existing and emerging policy suggests the change of use should be refused. The Inspector at the Core strategy EIP

confirmed that the facility was and is viable. The LPA must resist the loss of employment, community and leisure activities from this site.

- Determination of the application is premature until the site specific allocation documents of the core strategy are published.
- The design in terms of housing unit mix and affordable housing provision is not policy compliant. 50% provision of 3 bed and above across all tenures is not even close. 30% affordable provision against a 50% target, by an RSL is embarrassing.
- The design with respect to its relationship to listed and enclosure-listed buildings is inappropriate. English Heritage agree saying that the height in the middle of the site and the tower next to the kennels are not acceptable.
- The design in terms of overlooking and affect on neighbouring houses amenity is not policy compliant.
- The scheme is too dense according to the GLA matrix and recent secretary of state directive as detailed in the appeal over turn for the Billet Road site known as Banbury Park just 12 months ago.
- There are flaws in the developers flood risk attenuation proposals. The site was a rubbish tip in the past and the capacity of that made ground has not been properly assessed by the EA who assume it will be saturated at time of flood. This is not the case as historical evidence from people that worked there has shown. The LPA must investigate this further to be sure that the flood modelling is accurate. The LPA are on notice about this technical issue and must ensure it is properly resolved.
- The proposal to de-culvert the river now seems a non-starter. The amenity improvements this idea provided as illustrated by the applicant therefore all fall away. Many of the consultees are not aware of this change and if they were we suggest would have a different view of the proposals.
- The site was used as a rubbish tip after 1919. This fact has not been properly investigated in terms of contamination for future use for residential nor for structural suitability to build over. If the 1.3m of made ground over the site has to be removed before construction can commence this will have serious environmental consequences for the neighbouring properties.
- The scheme does not provide adequate compensation for the proposed loss of the leisure facilities. £1.75m is woefully inadequate.
- The scheme is financially non-viable. The applicants' own consultants have already admitted they cannot afford to pay any section 106 contributions. SOS have submitted a residual value

calculation demonstrating a £26m loss in order to deliver just 88 affordable units in place of the viable leisure and employment use of the listed buildings in their original use which the public so clearly want to see back.

- SOS are concerned that the traffic generation figures have been fudged and are out of date. The LPA highways authority must thoroughly examine the report submitted.
- The applicants have engaged in only superficial public consultation and when they have they have been told in no uncertain terms that the public want a dog track at this site. A message they continue to ignore.
- The applicants proposed dance studios, allotments and nursery facilities are not commercially viable and no evidence to the contrary has been provided.
- The applicants should be censured for land-banking this site in a manner which now ensures the borough has a festering eyesore to show the world during the Olympics instead of the thriving entertainment venue that would have been here, generating income for the borough, had they not been so misguided.

## **8 PLANNING POLICY CONSIDERATIONS**

8.1 In this instance, the Development Plan comprises:

- The London Plan [2011]; and
- The LBWF LP Core Strategy [2012].

8.2 Policies taken into account from the London Plan [2011]:

3.5 Quality of Design of Housing Developments  
7.2 An Inclusive Environment  
7.3 Designing Out Crime  
7.4 Local Character  
7.6 Architecture  
7.8 Heritage Assets and Archaeology

8.3 Policies taken into account from the LBWF LP Core Strategy [2012]

CS12 Protecting and Enhancing Heritage Assets  
CS15 Well Designed Buildings, Places and Spaces

## **9 ADDITIONAL CONSIDERATIONS**

### **Planning Policy Documents**

9.1 National Planning Policy Framework [Mar 2012]

On 25<sup>th</sup> July 2011, the Government published the draft National Planning Policy Framework [NPPF] for consultation. The NPPF was published in its final form and came into immediate effect on 27<sup>th</sup> March 2012. It is a material consideration in the determination of all planning

decisions and introduces a presumption in favour of sustainable development described as “a golden thread running through...decision taking.”

9.2 One of the “core planning principles” at paragraph 17 is to “conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; “

9.3 Section 12 of the NPPF deals with heritage assets and their treatment in greater detail, including the following recommendations at paragraph 131:

In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

9.4 Although the NPPF [2012] replaces PPS5, the companion “Historic Environment Planning Practice Guide [March 2010] is still extant and has been taken into account in consideration of the application.

9.5 Urban Design SPD [2010]

This document has the aim of raising the quality of design within the Borough and to improve local character in all new developments.

9.6 Inclusive Housing Design SPD [2011]

The core principles underlying the advice in the SPD are inclusive design and the social model of disability. The Lifetime Homes standards of the Joseph Rowntree Trust are applied across London and are incorporated into the London Plan [2011].

9.7 Inclusive Design for Non Residential Buildings SPD [2011]

This SPD is intended to raise awareness about inclusive design and raise the standard and quality of all non-residential development in the Borough. The objective being to ensure that buildings and their settings provide an inclusive environment that is usable by everyone.

9.8 Waltham Forest Sustainable Community Strategy

The Council’s Sustainable Community Strategy is a collective, long-term set of ambitions and priorities for the Borough and its position within London. The strategy identifies what the Council and partner organisations, such as the Police and health services, will do to build a more sustainable, prosperous and integrated community. Various

priorities and commitments are identified including improving housing quality and choice with the right kind of homes in the right places.

9.9 Draft Development Management Policies [Jan 2011]

DM1 Mixed Use Development

DM24 Health and Well Being

DM29 Heritage Assets

DM30 Design Principles, Standards and Local Distinctiveness

**10 KEY CONSIDERATIONS**

- 10.1 The main issue in this case is whether or not listed building consent can be granted, having special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Council has assessed these proposals in the light of this question.

Heritage Considerations

- 10.2 Policy CS12 *Protecting and Enhancing Heritage Assets* of the LBWF LP Core Strategy [2012] seeks to promote the conservation, enhancement and enjoyment of the Borough's heritage assets, including listed buildings and Archaeological Priority Zones.
- 10.3 The proposal allows for the retention of the listed buildings and seeks to ensure they have future uses, and would benefit the local community. The design has sought to evoke memories of the greyhound stadium as well as the relationship between the listed Totes and the typography of the spectator stands.
- 10.4 Part of the site is designated an Archaeological Priority Zone, in accordance with the LBWF LP Draft Proposals Map. Policy DM29 *Heritage Assets* of the LBWF LP Draft Development Management Policies [2011] states that *'The Council will ensure the preservation, protection and where possible the enhancement of the archaeological heritage of the borough. Where proposals affect heritage assets of archaeological interest, preference will be given to preservation in situ'*.
- 10.5 Policy 7.8 *Heritage Assets and Archaeology* of the London Plan [2011] states that *'development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail'*. The retention of the existing listed buildings, which comprise the kennels, Tote boards, west spectator stand and parking garage, provide these structures with new uses to better reveal their significance as heritage assets.
- 10.6 The proposal would result in the demolition of the non-listed buildings on the site. The spectator stands, which are curtilage listed, are not considered to be worthy of retention in terms of their individual merit, their contribution to the wider stadium complex, or having regard to the long-term viability and retention of the designated heritage assets. When all of the buildings at the Stadium were originally assessed for listing in 2007, the stands were specifically excluded from the listing

and a request was made in September 2010 to spot-list the stands, and was subsequently dismissed by English Heritage.

- 10.7 The incorporation of sensitive additions and alterations to the retained listed buildings include two single-storey and lightweight glazed structures to the main Tote building. This facilitates the provision of the Community Sports Centre that creates activity at the front of the building. These additions are designed to be of a simple, but high-quality design so not as to compete with the historic fabric of the listed building.
- 10.8 The enhancement of the setting of the retained heritage assets are set out:
- Maximising the axial connection between the two listed Tote structures at either end of the site. A large communal garden, positioned between the two central blocks, emphasises the connection between the two groups of listed buildings at either end of the site.
  - Ensuring that the built form of linear residential streets and the internal roads reflects the typography of the long grandstands and the racetrack.
  - Arranging the layout and heights of the proposed buildings so not as to compete with the existing building silhouette, or its appreciation from surrounding streets and vantage points.
  - As outlined in the Council's informal Urban Design Guidance [2009], incorporating a 'racetrack-inspired' open space within the site, but without adhering to its existing shape or size.
  - Proposing a variety of new open spaces to provide an enhanced and accessible setting for the listed buildings. The spaces include a 'plaza' to the front of the main Tote and an elevated communal garden, which emulates the raised race track.
  - Evoking memories of the track layout through the straightened layout of the road, the curvature of the proposed buildings, the location of new tree planting and in the use of landscaping materials.
  - Selecting materials for the new-build elements, which complement the existing and assist in the legibility of the original structures.
- 10.9 To address scale and impact on the listed buildings, the central blocks have been reduced in height to four storeys at their western end nearest to the Tote building. This responds to the scale of the listed building.
- 10.10 The scale of the central blocks avoids interference with the distinctive silhouette of the iconic Tote building. The setting of the listed building is enhanced with a new public space immediately opposite along with the raised central garden between the two central blocks affording views east-west through the development.



- 10.11 In accordance with the broad principles set out in the Council's informal Urban Design Guidance [2009], the scheme comprises a five-to-eight storey building at the south-eastern corner to act as a local landmark adjacent to the open space and defining the corner of the site. The building drops to single-storey immediately behind the kennels, housing the proposed energy centre. The building is adjacent to the single-storey listed kennels and English Heritage expressed some concern regarding the effect of the part-eight-storey building on the setting of the kennels.
- 10.12 Whilst the kennels are clearly an important part of the site's heritage, they are also unusual in many respects in being quite specific to the previous use of the site. The scheme seeks the refurbishment of the kennels for an appropriate and sustainable reuse, whilst providing a robust and viable design framework within which the wider redevelopment of the site as a whole can come forward. The proposal for a taller building in this location is broadly in accordance with the informal Urban Design Guidance [2009] and that, given the location of community allotments and landscaped play zone immediately fronting the kennels, their setting is not unduly compromised.
- 10.13 In making its assessment the Council has taken into account of the requirements in the NPPF as follows:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
  - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - The desirability of new development to make positive contribution to local character and distinctiveness.

The Council is satisfied that the current proposals meet these tests. The current proposals enable the listed elements to be reused as part of a residential-led mixed use development. Both the Tote building and the kennels are being re-used for community purposes without threatening their architectural integrity. The retention of the Tote building and in particular the illuminated Greyhound contribute to the distinctiveness of the development locally while retaining a familiar and cherished landmark.

#### Consultation Responses

- 10.14 Taking each notable point in turn, and in no particular order, a summary response to the issues raised as a result of consultation is provided, though most of the comments are relevant to the main application and considered in relation to it rather than specifically in relation to this listed building application:
- **Scheme is not viable:** The viability of the scheme is relevant to the 106 provision only and is dealt with in the report on the main application.

- **Loss of employment:** The site is not designated as an employment site or safeguarded for employment in planning policy terms. On this basis, the loss of employment would not preclude the change of use of the site to the type of mix proposed.
- **Loss of iconic greyhound / leisure facility:** The acceptability of the principle of development and land use has been outlined earlier in this report. In planning policy terms, the site is not constrained by designations of the Development Plan that again, would preclude the loss of the greyhound racing facility to other acceptable uses.
- **Increase in traffic congestion and off-site parking / insufficient parking provision:** The proposal would result in a parking provision below the maximum standards as set in the LBWF LP Draft Development Management Policies [2011].
- **Overdevelopment:** Reported earlier, the proposal of 316 HRH exceeds the density range set in the London Plan [2011]. Density calculation should however, be used as a guide to the acceptability of the proposal.
- **Lack of social infrastructure provision including doctors, schools, dentists, hospitals, etc:** The s106 contributions include monies towards education and healthcare, as detailed in the following section.
- **Design / scale / visual impact:** The LBWF Urban Design Officer reports no objection in principle to the design of the scheme however, acknowledges that any development of this size and scale would have an impact to a greater or lesser degree on residents living in the immediate area.
- **Loss of heritage / identity:** The proposal would result in the loss of the use of the site for greyhound racing. Having regard to the principle of development and land use, it is acceptable in planning policy terms as outlined earlier in the report.
- **Demolition of listed buildings and impact:** This application for listed building consent [Ref: 2011/0907/LB] was submitted concurrently with the planning application [Ref: 2011/0898]. The main revisions to the listed building application for the Entrance Tote building involve the provision of a skateboarding and BMX leisure facility on the upper deck of the street frontage [a former car park deck] and the adaptation of the interior of the Tote for climbing walls.
- English Heritage are unsure from the submission whether further alterations beyond those shown will be needed to the car deck for the skateboarding and the information supplied comments about finalising the design in consultation with English Heritage. Those discussions have not been concluded, although information was submitted to English Heritage in February 2012 to address such issues. It is proposed to satisfy the English Heritage concerns through the imposition of a condition [see below].

- 10.14.1 **Increase in criminal activity:** The proposal would seek to be designed in accordance with the principles and Practices of Secured By Design to minimise the risk of crime. This initiative is recommended as a condition to any planning permission.
- 10.14.2 **Loss of outlook and privacy / overlooking:** The LBWF Urban Design Officer acknowledges there would be some impact to occupiers of existing neighbouring properties. Measures taken to mitigate impact include angled and obscured glazing to the upper floor windows of the northern terrace block and details of balcony screening to be confirmed through the imposition of appropriate planning conditions to any planning permission.
- 10.14.3 **Loss of access to Selwyn School during construction:** The footpath from Empress Avenue towards Highams Park would be maintained during the course of construction.
- 10.14.4 **Site should retain recreational use:** The proposed mix of uses would incorporate sports and recreation.
- 10.14.5 **Introduce greater community / leisure facilities, e.g. cinema, bowling alley:** The proposed mix of uses is a matter for consideration as part of the scheme design. Should a proposal be submitted to the Local Planning Authority that would include a cinema / bowling alley, it would as with all planning applications be considered on its merits.
- 10.14.6 **Out of character:** The design of the scheme is considered acceptable by the LBWF Urban Design Officer. It would comprise a form of uses compatible with the surrounding area, i.e. residential-led.
- 10.14.7 **Environmental Health considerations including air quality, noise, health, vermin:** LBWF Environmental Health section raise no objection to the proposal. Any subsequent matters relating to the application site could be reported to the department for further investigation. Appropriate noise conditions are recommended to any planning permission to protect the living conditions of existing and future residents in the locality.
- 10.14.8 **Loss of trees:** Conditions to any planning permission are recommended for details of hard and soft landscaping to address concerns regarding this issue and to the screening of properties to protect the living conditions of existing and future occupiers in the locality.
- 10.14.9 **Loss of daylight / sunlight:** The submitted Daylight and Sunlight Report confirms that the overall impact on existing surrounding properties represents an improvement from the existing. The amenity space within the central courtyard is designed such that the BRE recommended levels of available sunlight are more than achieved.
- 10.14.10 **Impact on biodiversity and wildlife habitat:** The proposal would achieve open space provision and urban design

objectives that seek to promote and enhance biodiversity and wildlife habitat on and off-site, as supported by the submitted Landscape, Biodiversity and Open Space Strategy.

- 10.14.11 **Flawed documents / information supplied by the applicant:** The planning application documents were assessed at the time of validation and were considered acceptable for the purpose of assessment of the scheme. Subsequent documents and drawings submitted since the original submission have been assessed on the basis of the information shown.
- 10.14.12 **Lack of community engagement / consultation by the applicant:** This is not a matter for the Local Planning Authority to comment on however, sufficient consultation on the planning application has been carried out by the Council.
- 10.14.13 **Proposed leisure facilities and BMX / skateboard park would attract gangs / graffiti / vandalism:**
- 10.14.14 **Movement of bus stops:** This is the subject of ongoing discussions between LBWF Highways section and London Buses. There is no confirmation on the relocation of bus stops at the time of writing this report.
- 10.14.15 **Location of substation:** A condition is recommended to any planning permission for further details of the substation and any enclosure to protect the living conditions of existing and future residents in the locality.
- 10.14.16 **Access nearest to Empress Avenue opened up to traffic:** This access would be for pedestrians only.
- 10.14.17 **Health and Safety in the event of a fire particularly with the eight-storey building / insufficient emergency exits; and**
- 10.14.18 **No CCTV provision and Police base / office:** The scheme does not provide for CCTV or a Police base.
- 10.14.19 **Change of use / loss of greyhound facility:** The acceptability of the principle of development and land use is reported earlier in the report.
- 10.14.20 **Insufficient leisure offer and s106 contribution:** The provision of s106 contributions is dealt with in the main application.
- 10.14.21 **Insufficient public consultation:** Sufficient consultation on the application has been carried out by the Local Planning Authority.
- 10.14.22 **Inappropriate housing mix:** The housing mix proposed by the applicant results in a higher number of two-bedroom units than what would normally be preferred.
- 10.14.23 **Insufficient supplementary information following revisions to the scheme:** The applicant has provided supporting information in the form of revised plans and addendum statements to the original documents, which are considered satisfactory for the purpose of assessment of the application.

- 10.14.24 **Housing need can be accommodated without redevelopment of the site:** This is not an issue in planning policy terms that would preclude development of the site for housing.
- 10.14.25 **Affordable offer confusing:** The affordable housing provision made by the applicant has been set out earlier in the report and comprises 60 units as affordable housing [24 units as affordable rent and 36 units as shared ownership].
- 10.14.26 **Loss of public space:** The proposal provides open space within the scheme that would be accessible to all members of the community and beyond.
- 10.14.27 **Proposal would devalue neighbouring properties:** The devaluation of properties is not a material planning consideration.
- 10.14.28 **Effect on properties along Rushcroft Road in terms of the type of houses proposed on this street:** Two houses are proposed on Rushcroft Road that seek to replicate the scale of the arrangement of existing properties.
- 10.14.29 **Effect on utilities networks and neighbouring properties during construction:** A construction and demolition method statement is recommended as a condition to any planning permission to protect the living conditions of existing occupiers of neighbouring properties. It would have regard to hours of construction and the proposed type of machinery used, etc. for consideration.
- 10.14.30 **Land ownership issues:** This is a civil matter that should be resolved between the interested parties.
- 10.14.31 **Insufficient number of family housing:** Family housing consists of units with three or more bedrooms. The proposal would provide 47 three-bed units and 34 four-bed units; a total of 81 family housing out of the 294 units proposed. This is below the preferred provision of the Council as reported earlier in the report.
- 10.14.32 **Increase in flooding:** The Environment Agency is satisfied, through mitigation measures that there would be no change in terms of the impact on land and / or property adjacent to the site in ordinary conditions, and would represent an improvement during a storm event given the managed release of fluvial flooding, which does not currently take place.
- 10.14.33 **Leisure facilities should be accessible for all:** The leisure facilities would be accessible to all members of the community and beyond.
- 10.14.34 **Assurance that any dirt, dust and debris that enters the site will be cleared at the applicant's expense and not at the expense of the residents and that any damage done to properties / fences / boundaries, etc will be made good:** A

Construction and Demolition Method Statement would need to be submitted to the Local Planning Authority for approval as part of any planning permission to protect the living conditions of neighbouring residents.

- 10.14.35 **Save Our Stow Representation:** *The following is a response to the issues highlighted by Save Our Stow (which are relevant to the main and the listed buildings application) where they have not been referred to earlier in the report.*
- 10.14.36 Reference to the acceptability of principle of development and land use has been reported earlier, as has the issue of viability. Although there have been pre-application discussions and a formal response has been provided by the Council to a pre-application scheme, the Local Planning Authority has not received a formal submission from Bob Morton or any other part for an alternative scheme that retains the use of the site for greyhound racing, which would as with all planning applications, be considered on its merits.
- 10.14.37 Determination of the application is not premature where there is an up-to-date Development Plan for Waltham Forest upon which planning policies have been considered in the assessment of the application.
- 10.14.38 The design in terms of housing unit mix and affordable housing provision is not policy compliant and is acknowledged, which has been subject to viability.
- 10.14.39 The scheme has been revised to address the impact on the listed buildings, particularly a reduction in height of the central blocks towards the Tote.
- 10.14.40 The design in terms of overlooking and affect on neighbouring properties and density has been noted earlier in the report.
- 10.14.41 Regarding flood risk, the applicant has submitted an updated Flood Risk Assessment to address the concerns of the Environment Agency, to which no objection is raised to the proposal. The initial proposal to de-culvert the River Ching has been abandoned and other flood mitigation measures have been proposed that would represent a no worsening situation to what is existing.
- 10.14.42 In response to contamination, a condition is recommended to any planning permission for the submission of an Intrusive Site Investigation to be submitted to and approved in writing by the Local Planning Authority to determine the presence of contaminants across the site.
- 10.14.43 A viability appraisal was submitted with the application to demonstrate that the level of s106 contribution offered was the maximum that could be reasonably achieved having regard to other development considerations and costs.

- 10.14.44 The traffic generation figures in the submitted Transport Assessment have not been independently verified and the information provided has been taken as presented. Following comments made by LBWF Highways, the applicant has submitted an Addendum to the Transport Assessment by Transport Planning Practice [December 2011] that seeks to address the issues raised through an updated leisure offer and s106 contributions. In addition a contribution under a s278 Agreement £46,400 will be made by the applicant towards junction improvements outside the site and towards stadium trails.

Other Representations

- 10.15 Save Our Stow wish to report the following representations that have historically been submitted to the Council that do not form part of this planning application however, represents the scale of preference for the retention of the stadium and greyhound racing:
- 10.16 **Petition:** 25,000 circa signed petition for the retention of greyhound racing was handed to the Council by The Rt Hon Iain Duncan Smith MP on 16<sup>th</sup> August 2008.
- 10.17 **LBWF LDF:** 2,361 submissions to LBWF requesting that the stadium be retained for greyhound racing under the then LBWF LDF 'Call for Sites' in Summer 2009. The figure includes letters, newspaper cut-outs, emails and a petition containing 86 signatures.
- 10.18 Response to English Heritage
- 10.19 A significant amount of design work and consultation has been undertaken to assess the historic buildings, propose realistic uses that will bring the buildings back into active community use as well as design sensitive interventions and extensions to facilitate this. This has all been supported by English Heritage.
- 10.20 There is a remaining issue with English Heritage about the revisions to the car deck for the skateboarding. A letter from English Heritage dated 15<sup>th</sup> February 2012 details these concerns.
- 10.21 With regards to the upper car deck, the applicant confirms that there will be no alterations beyond those identified in the Addendum 2 of the Design and Access Statement [April 2012] and subsequently described in correspondence with LBWF. In respect of the matters outstanding, this relates only to the requirements for some perimeter and deck treatment and it is the detail on which the applicant awaits final comments from English Heritage.
- 10.22 The issues have not yet been fully resolved. However, there have been a number of conversations with Rachel Godden at English Heritage recently. In the most recent discussion, Ms Godden confirmed that while there were concerns about the overall impact of the designs on the Tote Building this was not an "in principle" objection.
- 10.23 Taking this conversation into account, and the agreement on the wider principles, it is considered that the remaining concerns are capable of

being dealt with through the imposition of an appropriate condition on any listed building consent. Condition 4 below is proposed to ensure that no works can take place on the Tote until all design details including perimeter fixings and deck treatment, have been agreed in writing by the Council in consultation with English Heritage.

## **11 S17 CRIME & DISORDER ACT [1998]**

- 11.1 Policy 7.3 of the London Plan [2011] seeks to ensure that developments should address security issues and provide safe and secure environments.
- 11.2 The Council have consulted the Crime Prevention Design Adviser [CPDA] in relation to the detailed crime and security matters. In addition to providing the Council with comments on the application, the CPDA has liaised directly with the applicant in relation to these matters, and wider counter-terrorism concerns that are now considered with major developments located in town centres. The CPDA is responsible for approving [or not] any application for a Secured By Design accreditation that may be applied for by the applicant.
- 11.3 Overall, the CPDA has advised that no objection in principle is raised in relation to the scheme, subject to the detailed Secured By Design matters being secured by conditions to any planning permission. As such, the application is considered to be acceptable in the context of Policy 7.3 *Designing out crime* of the London Plan (2011) and Policy CS16 *Making Waltham Forest Safer* of the LBWF LP Core Strategy [2012].

## **12 HUMAN RIGHTS**

- 12.1 In making your decision, you should be aware of and take into account any implications that may arise from the Human Rights Act [1998]. Under the Act, it is unlawful for a public authority such as the London Borough of Waltham Forest to act in a manner that is incompatible with the European Convention on Human Rights.
- 12.2 You are referred specifically to Article 8 [right to respect for private and family life], Article 1 of the First Protocol [protection of property]. It is not considered that the recommendation to grant permission in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others [in this case, the rights of the applicant]. The Council is also permitted to control the use of property in accordance with the general interest and the recommendation to grant permission is considered to be a proportionate response to the submitted application based on the considerations set out in this report.



## **13 EQUALITIES**

- 13.1 In making your decision, you must also have regard to the public sector equality duty [PSED] under s149 of the Equalities Act. This means that the Council must have due regard to the need [in discharging its functions] to:
- A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
  - B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life [or other areas where they are underrepresented] of people with a protected characteristic[s].
  - C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 13.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 13.3 The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149, is only one factor that needs to be considered, and may be balanced against other relevant factors.
- 12.4 It is not considered that the recommendation to grant permission in this case will have a disproportionately adverse impact on a protected characteristic.

## **14 CONCLUSION**

- 14.1 The proposal represents a form of development, which has regard to the listed buildings and would be subject to approval by English Heritage and DCLG.
- 14.2 A planning condition is recommended as part of any listed building consent in order to overcome the issues raised by English Heritage.
- 1.1.1 For all the reasons considered above, and weighing up the Development Plan policies and proposals, and other material considerations, including any comments received in response to publicity and consultation, as set out above, this application is recommended to **GRANT** listed building consent subject to conditions including English Heritage approval and referral to DCLG.

## 15 CONDITIONS

1. The works to which this consent relates must be begun not later than the expiration of three years beginning with the date of this decision notice.

REASON: To comply with the requirements of Section 18(1) (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

2. The development shall be carried out in accordance with the following Drawing Numbers [unless details therein are otherwise reserved for determination through approval of conditions set out above]:

Received 23.12.11

- P-100 to P117;
- P-203A, P-206A to P-209A, P-213A, P215-219A, P-225A to P-261A, P-262; and
- P-300A to P-363A, P-365A, P-366 to P-370.

Received 24.04.12

- P-200B, P-202B, P-204B, P-205B, P-210B to P-212B, P-214B, P-220B to P-224B, and
- P-364B.

REASON: In order to safeguard the special architectural or historic interest of this listed building in accordance with Policy CS12 of the LBWF LP Core Strategy [2012].

3. All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to methods used and to material, colour, texture and profile, unless otherwise approved in writing by the Local Planning Authority.

REASON: In order to safeguard the special architectural or historic interest of this listed building in accordance with Policy CS12 of the LBWF LP Core Strategy [2012].

4. Notwithstanding the information shown on the submitted plans, approval of English Heritage is required prior to the upper deck being brought back into use.

REASON: In order to safeguard the special architectural or historic interest of this listed building in accordance with Policy CS12 of the LBWF LP Core Strategy [2012].

## 16 INFORMATIVES

1. Supporting documents submitted with the application that should be read in connection with the submitted plans:

Planning and Regeneration Statement by AKA Planning [June 2011];

- Daylight and Sunlight Report by Calford Seaden [June 2011];
- Landscape, Biodiversity and Open Space Strategy by Liz Lake Associates [April 2011];
- Landscape Drawings by Liz Lake Associates [May 2011]:
  - 1270 01 Rev B Planting Strategy Plan
  - 1270.01 Ching River Improvements
  - 1270.09 Public Node / River Ching
  - 1270/11 Rev C Hard Landscape Masterplan
  - 1270.12 Visualisation of Courtyard Gardens
  - 1270.13 Soft Landscape Masterplan
  - 1270.14 Eastern Play Area
  - 1270.15 Public Node / River Ching
  - 1270.16 Play Design;
- Ecological Assessment by Eco Planning UK Ltd for and on behalf of Liz Lake Associates [January 2011];
- Arboricultural Report by Eco Planning UK Ltd for and on behalf of Liz Lake Associates [February 2011];
- Environmental Noise Survey and PPG24 Assessment by Hann Tucker Associates [June 2011];
- Energy Efficiency Statement and Sustainability Strategy by Calford Seaden [June 2011];
- Foul and Surface Water Sewerage and Utilities Statement [June 2011];
- Site Waste Management Report by Quadrant Construction [June 2011];
- Method Statement for Demolition by Quadrant Construction [June 2011];
- Transport Assessment by Transport Planning Practice [June 2011];
- Contaminated Land Survey by MLM Consulting Engineers Ltd [June 2011];
- Heritage Statement by Montague Evans [June 2011];
- Archaeological Desk Based Assessment by CgMs Consulting [June 2011];

- Air Quality Screening Assessment for Walthamstow Stadium Site, London by Matthew Whitman [June 2011];
- Flood Risk Assessment by MLM Consulting Engineers Ltd [June 2011];
- Statement of Community Engagement by AKA Planning [June 2011];
- Sporting and Business Case by RAE Sport and Leisure Consultants [June 2011];
- Methodology Statement: Development Viability Assessment by Jones Lang LaSalle [June 2011];
- Schedule of Works to Listed Buildings by Martin Associates [June 2011];
- Structural Investigation Report by Knapp Hicks [June 2011];
- Heritage Assessment by Montague Evans [June 2011];
- Planning and Regeneration Statement by AKA Planning [December 2011];
- Addendum Report to Design and Access Statement by Conran + Partners [December 2011];
- Addendum to Transport Assessment by Transport Planning Practice [December 2011];
- Daylight and Sunlight Report by Calford Seaden [December 2011];
- Landscape, Biodiversity and Open Space Strategy by Liz Lake Associates [December 2011];
- Ecological Assessment by [Revision 1] by Liz Lake Associates [December 2011];
- Bat Survey by Liz Lake Associates [December 2011];
- Revised Heritage Statement by Montague Evans [December 2011];
- Addendum to Energy Strategy by Calford Seaden [December 2011];
- Addendum to Sporting and Leisure Business Case by RAE Sport and Leisure Consultants [December 2011];
- EIA Screening Request by AKA Planning [December 2011];
- Response to London Plan July 2011 Chapter 5 by Calford Seaden [December 2011];
- Addendum Report 2 To Design & Access Statement by Conran + Partners [April 2012];
- Flood Risk Assessment by MLM Consulting Engineers Ltd [April 2012];

- Landscape, Biodiversity and Open Space Strategy UPDATE by Liz Lake Associates [2012]; and
- Landscape Drawings by Liz Lake Associates [April 2012]:
  - 1270/11 Rev E Hard Landscape Masterplan
  - 1270.13 Rev B Soft Landscape Masterplan.

## APPENDIX 1

**This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.**

Name: **KENNELS AT WALTHAMSTOW STADIUM**

List Entry Number: 1391977

Location

KENNELS AT WALTHAMSTOW STADIUM, CHINGFORD ROAD

The building may lie within the boundary of more than one authority.

**County:** Greater London Authority

**District:** Waltham Forest

**District Type:** London Borough

**Parish:**

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 23-May-2007

Date of most recent amendment: Not applicable to this List entry.

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### LEGACY SYSTEM INFORMATION

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 495250

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### ASSET GROUPINGS

This List entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

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### LIST ENTRY DESCRIPTION

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

## Details

1802/0/10035 CHINGFORD ROAD  
23-MAY-07 Kennels at Walthamstow Stadium

### II

Kennels to Walthamstow Greyhound Stadium. 1930s. Concrete construction with steeply pitched red tiled roofs. A splayed linear arrangement sited at the east end of the track.

EXTERIOR: To the centre is the tall tote board, which has a later face, flanked by original tall walls that curve down to the rear. Flanking and in front of this is the lower kennel range comprising individual kennels under pitched roofs. In front is a colonnade on single posts, those to centre with a pair of curved braces, and under corrugated roofs. At the end of each side wing that splays slightly forward, are end pavilions, these with steeply pitched octagonal roofs that kick out at the bottom and have prominent ribs with flashing. The windows in these are late-C20 replacements. The plinth has horizontal fluted detailing. Linking the end pavilions and enclosing the yard in front, is a low concrete wall.

INTERIORS: Not inspected, but the interiors appear to consist only of kennels, which open directly to the open courtyard.

HISTORY: The stadium was first built in 1931, on the site of the former Walthamstow Grange football club, by the Chandler family, who still own the successful enterprise. The complex has had a number of improvements and additions since it first opened, such as rebuilt spectator stands in the years just after construction, new glazed-in stands in 1965, and a new main entrance (to the north side) in 1969, but the notable frontage range (which is listed separately) remains as built in 1931. The kennels were built as part of this first phase. A license was obtained under the Parliamentary Totalisator Betting Act in 1934. The stands were rebuilt in 1934 and again in 1938, the latter being the date of the concrete south stand that survives, albeit altered. A photograph of 1952 for the Coronation shows the front lit up with neon lights in the same design as now, but with additional swags and reading, 'Long live Her Majesty Queen Elizabeth II'. The complex underwent considerable updating in the 1980s, its second heyday. This is when the post-modern red tubular detailing was added, and the hospitality suites updated.

Greyhound racing evolved as a sport from the 1920s, out of hare and rabbit coursing, a much older leisure pursuit. It was the invention of an Oklahoma entrepreneur, O.P. Smith who invented the mechanical hare, and the idea came to England in 1925. The Belle Vue Greyhound Stadium in Manchester was the first facility established here, and another followed at White City in London. By 1939, there were 100 tracks in Britain, and London had at least ten. It was a hugely popular activity, and in 1946, attendance numbers rivalled those for football. The number of surviving tracks is much lower, and 56 operate in Britain today.

**ASSESSMENT OF IMPORTANCE:** These kennels form an integral part of the first phase of construction at Walthamstow Stadium, the best surviving and most architecturally interesting vintage greyhound stadium in the country. The kennels have special interest as purpose-built kennels that feature a mini tote board and eccentric pavilions, altogether in a similar Art Deco-inspired style and materials of the Entrance Range with Tote Board, which is listed separately. The stadium has special historic interest as the best surviving and most celebrated Inter-War greyhound stadium, a nationally loved building type expressive of developments in Inter-War mass culture and entertainment.

The Entrance Range including Tote Board to the west is listed separately.

**SOURCES:**

Historic photographs in the collection of the Vestry House Museum, LB Waltham Forest.

'The Gamble that paid off' in *The Walthamstow Guardian*, 1st April 1955.

'The Stow is beating slump in dog racing' in *Walthamstow Guardian*, 21st Nov. 1969.

'Walthamstow Stadium celebrates 50 years of dog racing' in the *Walthamstow Guardian*. 23rd January 1981.

Genders, R. *National Greyhound Racing Club book of Greyhound Racing* (Pelham, 1990)

Inglis, S. *Played in Manchester: The architectural heritage of a city at play.* (English Heritage, 2004).

Cherry, B., O'Brien, C. and Pevsner, N. *Buildings of England London 5: East* (Yale University Press, 2005)

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**SELECTED SOURCES**

1. **Book Reference** - *Author:* Roy Genders - *Title:* National Greyhound Racing Club book of Greyhound Racing (Pelham Dogs) - *Date:* 1990
2. **Article Reference** - *Title:* 1 April - *Date:* 1955 - *Journal Title:* The Walthamstow Guardian
3. **Article Reference** - *Title:* 21 November - *Date:* 1969 - *Journal Title:* The Walthamstow Guardian
4. **Article Reference** - *Title:* 23 January - *Date:* 1981 - *Journal Title:* The Walthamstow Guardian
5. **Article Reference** - *Author:* Bridget Cherry Charles O'Brien and Nikolaus Pevsner - *Title:* London 5 East - *Date:* 2005 - *Journal Title:* The Buildings of England
6. **Article Reference** - *Author:* Simon Inglis - *Title:* Played in Manchester The architectural heritage of a city at play - *Date:* 2004 - *Journal Title:* Played In Britain



**This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.**

**Name: ENTRANCE RANGE INCLUDING TOTE BOARD AT WALTHAMSTOW STADIUM**

**List entry Number:** 1391978

Location

ENTRANCE RANGE INCLUDING TOTE BOARD AT WALTHAMSTOW STADIUM, CHINGFORD ROAD

The building may lie within the boundary of more than one authority.

<b>County</b>	<b>District</b>	<b>District Type</b>	<b>Parish</b>
Greater London Authority	Waltham Forest	London Borough	

National Park: Not applicable to this List entry.

**Grade:** II

**Date first listed:** 23-May-2007

**Date of most recent amendment:** Not applicable to this List entry.

**Legacy System Information**

The contents of this record have been generated from a legacy data system.

**Legacy System:** LBS

**UID:** 494389

**Asset Groupings**

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

**List entry Description**

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

## Details

### 1802/0/10031 CHINGFORD ROAD 23-MAY-07 Entrance Range including Tote Board at Walthamstow Stadium

II Entrance range and totaliser board for greyhound stadium. 1932 with later-C20 alterations. Architect unknown. Concrete construction in Art Deco Style. EXTERIOR: Landmark frontage to Chingford Road has tall central parapet (the tote board to the reverse) with stepped detailing to top and central clock. This carries the prominent lettering with WALTHAMSTOW slightly cambered over a racing greyhound over STADIUM. This is even more visible at night when the neon lights of 1951 (installed for the Coronation) illuminate the lettering and greyhound. In front of this is a wide low concrete range used for parking, but also Art Deco in its detailing. The open ground floor has wide bays with a splayed arch, then a fluted entablature, then tapered obelisks holding the upper, open air parking deck. There are horizontal tube railings, and the curved balustrade is a 1980s red tubular affair. There are integral car park ramps through the end bays to the upper deck, and all this is set on a low plinth with similar fluted detailing. Deep beams run back the depth of the car park range, which is open at the ends, and the fluted detailing continues to the return. Set back to right is a two storey entrance range with first floor offices that have a parade of single windows with three panes arranged vertically, and then a continuous horizontal band that takes the curved corner, in a streamlined manner. The entrance, marked 'Popular' is at the far right. To the left, the plinth curves round to the front into a low wall with fluted detailing. The rear of this prominent parapet is the tote board. This faces the track and the stands, and was computerised in the 1980s, but is otherwise as it appears in early photographs. Attached and to the southwest is the former stand, converted to a restaurant 'Classic Diner' in the 1990s, but this is of lesser interest. Not of special interest are the separate north and south spectator stands, which while of some interest as parts of the larger complex, they are not special in terms of technological innovation, and both stands have been altered later in the C20, particularly the north stand which carries the main entrance of 1969 and which has been much altered and extended to the east in the later-C20. INTERIOR: There are few interiors of significance in the front section. 'Popular' entrance to south has metal turnstiles. HISTORY: The stadium was first built in 1931, on the site of the former Walthamstow Grange football club, by the Chandler family, who still own the successful enterprise. The complex has had a number of improvements and additions since it first opened, such as rebuilt spectator stands in the years just after construction, new glazed-in stands in 1965, and a new main entrance (to the north side) in 1969, but the notable frontage range (which is listed separately) remains as built in 1931. The kennels were built as part of this first phase. A license was obtained under the Parliamentary Totalisator Betting Act in 1934. The stands were rebuilt in 1934 and again in 1938, the latter being the date of the concrete south stand that survives, albeit altered. A photograph of 1952 for the Coronation shows the front lit up with neon lights in the same design as now, but with additional swags and reading, 'Long live Her Majesty Queen

Elizabeth II'. The complex underwent considerable updating in the 1980s, its second heyday. This is when the post-modern red tubular detailing was added, and the hospitality suites updated.

Greyhound racing evolved as a sport from the 1920s, out of hare and rabbit coursing, a much older leisure pursuit. It was the invention of an Oklahoma entrepreneur, O.P. Smith who invented the mechanical hare, and the idea came to England in 1925. The Belle Vue Greyhound Stadium in Manchester was the first facility established here, and another followed at White City in London. By 1939, there were 100 tracks in Britain, and London had at least ten. It was a hugely popular activity, and in 1946, attendance numbers rivalled those for football. The number of surviving tracks is much lower, and 56 operate in Britain today.

**SUBSIDIARY:** The east entrance from Chingford Road is flanked by a pair of slightly tapered pylons, with fluted detailing to plinth and top. The Kennels are listed separately.

**SOURCES:** Historic photographs in the collection of the Vestry House Museum, LB Waltham Forest. 'The Gamble that paid off' in *The Walthamstow Guardian*, 1st April 1955. 'The Stow is beating slump in dog racing' in *Walthamstow Guardian*, 21st Nov. 1969. Genders, R. *National Greyhound Racing Club book of Greyhound Racing* (Pelham, 1990) Inglis, S. *Played in Manchester: The architectural heritage of a city at play*. (English Heritage, 2004. Cherry, B., O'Brien, C. and Pevsner, N. *Buildings of England London 5: East* (Yale University Press, 2005)

**ASSESSMENT OF IMPORTANCE:** The Entrance Range and Tote Board at Walthamstow Stadium meets the listing criteria for its special architectural interest as the key component of the best surviving and most architecturally interesting vintage greyhound stadium in the country, with bold Art Deco influences in the stepped and streamlined detailing. It is also a major East London landmark, with the neon lighting of 1951 design on earlier lettering being a fitting use of such architectural advertising. Furthermore, it has special historic interest as the best surviving and most celebrated Inter-War greyhound stadium, a nationally loved building type expressive of developments in inter-War mass culture and entertainment.

#### Selected Sources

1. **Book Reference** - *Author:* Roy Genders - *Title:* National Greyhound Racing Club book of Greyhound Racing (Pelham Dogs) - *Date:* 1990
2. **Article Reference** - *Title:* 1 April - *Date:* 1955 - *Journal Title:* The Walthamstow Guardian
3. **Article Reference** - *Title:* 21 November - *Date:* 1969 - *Journal Title:* The Walthamstow Guardian
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5. **Article Reference** - *Author:* Simon Inglis - *Title:* Played in Manchester  
The architectural heritage of a city at play - *Date:* 2004 - *Journal Title:*  
Played In Britain