



ENGLISH HERITAGE

Planning Policy Team
London Borough of Waltham Forest

Our ref:
Your ref:

BY E-MAIL: planning.policy@walthamforest.gov.uk

Telephone:
Fax:

3 October 2014

Dear Sir/Madam,

London Borough of Waltham Forest – Blackhorse Lane Area Action Plan: Examination – Proposed Main and Additional Modifications

Thank you for consulting English Heritage on the Main and Additional Modifications proposed to the London Borough of Waltham Forest's Blackhorse Lane Area Action Plan (AAP). As the Government's adviser on the historic environment, and a statutory consultee in the context of Strategic Environmental Assessment (SEA), English Heritage is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process.

Accordingly, we have reviewed this consultation in the context of the *National Planning Policy Framework* (NPPF) and its core principle that heritage assets be conserved 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. Having done this, English Heritage wishes to note a way in which the proposed modifications are at risk of running contrary to the NPPF.

Undesignated Heritage Assets

The Tryst Public House and Standard Music Venue is identified as a Building of Merit by the Borough, and as having "historically' provided a landmark and important community facility'. In addition, historic records note the public house as present from at least the 1860s under the name – The Royal Standard Pub, meaning that it represents the development of the borough prior to the arrival of the railway, the expansion of the reservoirs, and the associated industrialisation of the Upper Lea Valley. In terms of our *Conservation Principles* guidance this would give the building sufficient evidential and communal value, together with lesser aesthetic and historic values, to be recognised as an undesignated heritage asset.

Paragraph 135 of the NPPF provides as follows:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a

balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

English Heritage considers that the proposed Additional Modification 29 (AM29) is contrary to this paragraph by allowing the removal of the asset in principle. In order to avoid this derogation from the NPPF, we recommend that the modification is reworded as follows:

Ensuring, in the first instance, that redevelopment of the Station Hub (Site BHL1) retains and refurbishes the Tryst Public House and Standard Music Venue for their established uses. In the event that harm to this undesignated heritage asset is justified, redevelopment should endeavour to retain the elements of the building that give it heritage significance. Should loss of the asset be justified, redevelopment should provide a public house capable of hosting live music within a high quality mixed use development.

Building Heights

English Heritage notes that the content of the submission version of paragraph 3.5.13 appears to respond positively to our submission to the Preferred Option stage of the AAP indicating the importance of recognising the primary character of the Borough as two-storeys and developing a measured place-making approach to increasing building heights in the area (letter dated 28 September 2011).

English Heritage supports the Borough's position that building heights in the AAP area need to relate sensitively to existing built fabric, which is not primarily 5-9 storeys. We generally accept the proposed amendments to paragraphs 3.5.13 and 3.5.14, but were disappointed with the removal of the following sentence from paragraph 3.5.13:

This approach is mindful of the extent of 2 storey residential neighbourhoods within the area, and the scale of existing buildings of merit.

We would welcome its reinstatement because it reflects the Urban Design Framework, a form of evidence preparation that we strongly encourage as part of developing a positive strategy for the conservation and enhancement of the historic environment in accordance with paragraph 126 of the NPPF.

Conclusion

It must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the AAP which may have adverse effects on the historic environment.

Yours sincerely



Claire Craig

Principal Adviser – Historic Places Team: London

E-mail: Claire.Craig@english-heritage.org.uk