

Local Plan Team
Place Directorate
London Borough of Waltham Forest
Waltham Forest Town Hall
Forest Road
London E17 4JF

By email: localplanconsultations@walthamforest.gov.uk

18 September 2023

Dear Local Plan Team

London Borough of Waltham Forest – Local Plan Part 1 Main Modifications Consultation

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

We have reviewed the document in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, 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. The place of the historic environment as a key strand of sustainable development (NPPF para 8) provides for conservation and positive enhancement to be an integrated part of planning for future development sustainably.

Comments on proposed Main Modifications

We note and welcome the majority of the proposed modifications that relate to the historic environment. Our comments are therefore limited as a result.

MM21 and MM23

We note that in relation to various conservation areas, it is proposed that the term 'conserve and enhance' is used (eg revised Policy 9, clause K on p25 of the schedule) at points, while at others the term 'preserving or enhancing' (see revised Policy 10, clause Cii) is used. We would suggest that in the interests of consistency one term should be used in relation to the

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management of conservation areas. We would also point out that Policy 74 of the draft Local Plan relates to conservation areas, not Policy 72 as indicated at Policy 10 I on page 28.

MM145

As set out, we consider that the revised Policy 73 A is somewhat unclear, as it could be taken to separate the conservation of the building from the conservation of its heritage significance. We would suggest the following more clearly sets out the primary requirement to conserve what is special about a listed building

All proposals for listed buildings will be expected to conserve the building's significance, including any contribution to that significance made by its setting. Proposals should conserve any features of special architectural or historic interest, and where possible, enhance the significance of the building.

MM147

The revised Policy 75 requires desk-based assessments for all applications in Archaeological Priority Areas (APAs). However, this is not a proportionate approach to householder and minor applications in Tier 2 and Tier 3 APAs, as these would not normally benefit from such an approach. We suggest Clause B be amended to

Desk-based assessments will be required for all proposals within designated Tier 1 Archaeological Priority Areas and for major applications in Tier 2 Archaeological Priority Areas.

MM148

Policy 76 B supports the loss of undesignated assets only in exceptional circumstances, which although is likely to be an appropriate approach for locally listed buildings, would be harder to apply consistently to undesignated archaeology which is lost (albeit with investigation and recording carried out first) on a regular basis. We would recommend that clause B be revised to refer to locally listed buildings only and a further clause C included:

Proposals that create harm to undesignated archaeological heritage assets, either assets identified by the LPA or assets identified during the application making process, should be supported with an appropriate assessment and justification. In such circumstances, an archaeological desk-based assessment would be expected to accompany applications involving groundworks in Tier 1 APAs, all major applications in Tier 2 APAs and larger major applications in Tier 3 APAs. Schemes that create harm to undesignated archaeological assets



with demonstrably equivalent significance to scheduled monuments will be refused in all but wholly exceptional circumstances.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Please do not hesitate to contact me should you require any further information.

Yours faithfully

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