

## 12. CULTURAL HERITAGE

### Introduction

- 12.1 This chapter of the ES assesses the likely significant effects of the Development on the Site and its environment in respect of Cultural Heritage. This chapter has been prepared by James Archer BA (Hons) ACIfA<sup>1</sup> and Victoria Brocksopp BA (Hons), MA of RPS Heritage. RPS Heritage are one of the largest heritage teams within the UK with a proven track record relating to the successful delivery of sustainable major urban developments involving effects on the historic environment, both within London and also in urban centres across the country. Relevant Supporting information is provided within Appendices 12.1 (Archaeological Desk Based Assessment) and 12.2 (Built Heritage Baseline) of this ES.
- 12.2 The purpose of this chapter is to assess the potential effects of the Development on the cultural heritage assets within and in proximity to the Site. This includes both archaeological and built heritage assets. The Site is located within the London Borough of Waltham Forest (LBWF). This chapter of the ES sets out the policy context, assessment methodology and baseline conditions of the Site, examines potential effects of the Development, and presents mitigation measures to prevent, reduce or offset (where possible) any significant adverse impacts. The likely residual impacts once these mitigation measures have been implemented are presented, and their significance assessed. It further considers these effects alongside potential cumulative effects arising from nearby schemes.

### Policy Context

#### National Legislation

- 12.3 National legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014<sup>i</sup>.
- 12.4 The relevant legislation that relates to the setting of heritage assets is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990<sup>ii</sup>. Section 66(1) sets out the duty of the planning authority with regard to the determination of applications for development that may affect the setting of a heritage asset. It states that:

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*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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."*

- 12.5 This requirement is an acknowledgement that although the impact of a development proposal may not affect the physical fabric of a listed building or a heritage asset, it is possible to affect its special interest through development that may be located within its setting.

### National Planning Policy Framework<sup>iii</sup>

- 12.6 The revised National Planning Policy Framework (NPPF) was published in July 2018, which was most recently revised in June 2019. The NPPF sets out national policy relating to the historic built environment, and is supported by the National Planning Practice Guidance (PPG), a web-based resource that was launched in 6th March 2014 and has since been periodically updated.

- 12.7 Section 16 of the NPPF is entitled 'Conserving and enhancing the historic environment' and provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Heritage assets are described as:

*"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."*

- 12.8 The guidance contained within Section 16, 'Conserving and Enhancing the Historic Environment' paragraphs 184-202, relates to the historic environment and developments which may have an effect upon it. These policies provide the framework for the preparation of policies for the historic environment and guidance for planning authorities, property owners, developers and others on the conservation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking: the delivery of sustainable development; understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment; conservation of England's heritage assets in a manner appropriate to their significance; and recognition that heritage contributes to our knowledge and understanding of the past.

- 12.9 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 189 states

that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset and to understand the potential impact of the proposal on their significance.

- 12.10 The NPPF policy states clearly that the more important the heritage asset, the greater the level of protection is given to that asset. Paragraphs 193-4 state that:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

*a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

- 12.11 Paragraphs 193-4 note that significance can be harmed or lost through development within the setting of a heritage asset. Paragraph 195 provides a test for assessing harm in relation to designated heritage assets: "Where the application will lead to substantial harm or total loss of significance, local planning authorities should refuse consent; Paragraph 196 notes that where development, will lead to less than substantial harm... the public benefits should be weighed against the loss".

- 12.12 Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that directly or indirectly affect 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.

- 12.13 Paragraph 200 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It emphasises that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably

### Planning Practice Guidance<sup>iv</sup>

- 12.14 The Government launched the PPG to accompany the NPPF policies on 6 March 2014, which has since been updated periodically. The guidance states that the protection and enhancement of the historic environment is an important part of national policy to achieve sustainable development. The PPG relating to Conserving and Enhancing the Historic Environment was last updated July 2019.
- 12.15 It is crucial that the significance of a heritage asset is understood and consideration of this incorporated into decision making. The guidance explains that heritage assets may be affected by, direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.
- 12.16 The guidance reiterates that the crucial issue in the assessment of proposals is whether development would cause substantial harm to the significance of the heritage asset and explains that significance derives not only from a heritage asset's physical presence, but also from its setting.
- 12.17 The guidance addresses the policy in the NPPF that relates to substantial or less than substantial harm as set out in paragraph 196 of the Framework, which notes that "where development, will lead to less than substantial harm... the public benefits should be weighed against the loss."
- 12.18 The policy guidance states that as part of the assessment of the impact of a proposal, thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

### Local Planning Policy

- 12.19 The relevant Strategic Development Plan framework is provided by the London Plan - the Spatial Development Strategy for London, Consolidated with Alterations Since 2011 (March 2016)<sup>v</sup>. There were no changes to Policy 7.8 Heritage Assets and Archaeology; slight amendments were made to the wording of Policy 7.10. Minor Alterations to the London Plan (MALP), published 14 March 2016, which was consolidated with the Further Alterations to the

London Plan (FALP adopted March 2015), concern housing standards and parking, with no alteration to heritage policies.

12.20 Policy in the London Plan relevant to cultural heritage at the study site includes the following:

*Policy 7.8 Heritage Assets and Archaeology*

*Strategic*

*London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, Registered Battlefields, Scheduled Monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.*

*Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.*

*Planning Decisions*

*Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*

*Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.*

*New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.*

*LDF Preparation*

*Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration. Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.*

*Policy 7.9 Heritage-led Regeneration*

*Strategic*

*Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, blue ribbon network and public realm.*

#### *Planning Decisions*

*The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.*

12.21 The emerging draft new London Plan is at an advanced stage with the Examination in Public complete, the Inspector's report issued on behalf of the Secretary of State and the Mayor's response to that with the publication of The London Plan Intend to Publish (December 2019) version issued to the Secretary of State<sup>vi</sup>. Chapter 7 'Heritage and Culture' contains relevant draft policies HC1 to HC7. Draft Policy HC1 has particular relevance to the Site, as follows:

#### *Policy HC1 Heritage conservation and growth*

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
 
  - 1 setting out a clear vision that recognises and embeds the role of heritage in place-making*
  - 2 utilising the heritage significance of a site or area in the planning and design process*
  - 3 integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
  - 4 delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.**
- A. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic*

*to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

- B. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.*
- C. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.*

12.22 The relevant Development Plan framework is provided by the London Borough of Waltham Forest Core Strategy document, adopted March 2012<sup>vii</sup>, which includes the following policy relating to heritage:

*Strategic Objective 12:*

*Conserve and enhance the Borough's heritage assets whilst maximising their contribution to future economic growth and community well-being.*

*Policy CS12 - Protecting and Enhancing Heritage Assets*

*In managing growth and change, the Council will promote the conservation, enhancement and enjoyment of the Borough's heritage assets and their settings such as conservation areas, listed buildings, parks and gardens of local historic interest, archaeological priority zones and other buildings and spaces of local historic value by:*

- A. keeping under review heritage designations and designating additional areas, buildings and spaces for protection where justified by evidence;*
- B. carrying out, reviewing and implementing Conservation Area Appraisals and management plans;*
- C. promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas;*
- D. ensuring improved access to historic assets and improved understanding of the Borough's history.*

12.23 The Borough's Local Plan Development Management Policies, adopted in October 2013<sup>viii</sup>, contains the following policy relating to archaeology and built heritage:

*Policy DM28*

*Development proposals which may affect the significance of heritage assets in Waltham Forest (both designated and undesignated) or their setting should demonstrate how these assets will be protected, conserved and where appropriate enhanced. A Heritage Statement required under paragraph 128 of the NPPF should accompany all applications that affect heritage assets. In considering proposals, the Council will have regard to the following:*

*Conservation Areas:*

- A. In order to preserve or enhance the significance, including character or appearance of the conservation areas (as shown on the Policies Map), and their settings, the Council will:*
- i. permit development in conservation areas which preserves or enhances the character or appearance of the area;*
  - ii. only permit the demolition of any building in a conservation area where it is clear that this would not have an adverse effect on the character or appearance of the area. In cases where demolition may be justified in accordance with national policy, consent to demolish will be given only when acceptable plans for redevelopment have been agreed;*
  - iii. use Article 4 directions to raise awareness of good conservation practice and encourage property owners to implement appropriate improvements to properties and other heritage assets which preserve or enhance the character of conservation areas;*
  - iv. preserve any tree which contributes to the character of the conservation area;*
  - v. seek designation, where appropriate, of conservation areas as areas of special control for advertisements.*

*Statutorily Listed Buildings*

- B. The Council will only permit proposals involving the demolition of any building which is on the statutory list of buildings of special architectural and/or historic interest where exceptional circumstances are shown that outweigh the case for retention. The fact that a building has become derelict will not in itself be sufficient reason to permit its demolition.*
- C. The Council will permit uses, alterations or extensions that would not be detrimental to the significance of the assets including fabric, appearance, historic interest or setting of these buildings: and it will encourage proposals which seek their rehabilitation, maintenance, repair and enhancement;*
- D. Wherever possible consideration should be given to improving access for people with disabilities to all listed buildings open to the public or where people are employed.*

*Locally Listed Buildings*

- E. The Council will seek to retain buildings included on its local list of buildings of architectural/historic interest and encourage their sympathetic maintenance and enhancement. Alterations or extensions to locally listed buildings will be expected to achieve a high standard of design.*

*Archaeological Heritage*

- F. The Council will ensure the preservation, protection and where possible the enhancement of the archaeological heritage of the borough (See Schedule 23 and the Policies Map). Where proposals affect heritage assets of archaeological interest, preference will be given to preservation in situ. However, where loss of the asset is justified in accordance with national policy, the remains should be appropriately recorded, assessed, analysed, disseminated and the archive deposited.*

*Improvement Schemes*

- G. The Council will work with owners/partners to restore buildings, spaces and areas. Where significant harm to a heritage asset is justified in accordance with national policy, a programme of work will be secured with mitigation measures through planning conditions or a planning obligation.*

12.24 The Waltham Forest Local Plan 2020-2035 draft consultation version was published in July 2019<sup>ix</sup>. The following draft policies are included within this document:

*16 Enhancing and Preserving our Heritage**Strategic Objective*

*Ensure Waltham Forest's network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage.*

*Policy 77**Designated Heritage Assets*

- A. The Council will ensure designated heritage assets are preserved and enhanced within the planning process, with a strong presumption in favour of retention and enhancement, to ensure the borough's history, identity and sense of place is protected and maintained for existing and future generations.*
- B. A heritage statement should accompany all applications that affect designated heritage assets, clearly explaining the significance of the asset, how it will be impacted by the proposal, and providing clear and convincing justification for any change.*
- C. Any harm to designated heritage assets, irrespective of whether this would amount to substantial harm, total loss or less than*

*substantial harm, will be given great weight in the planning process, and will require clear and convincing justification.*

- D. Development proposals that lead to either substantial harm to or total loss of designated heritage assets will not be permitted, unless it can be demonstrated that such harm is necessary to achieve substantial benefits which could not be delivered otherwise, or all of the following apply:*
- i. the nature of the heritage asset prevents all reasonable uses of the site;*
  - ii. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
  - iii. conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and*
  - iv. the harm or loss is outweighed by the benefit of bring the site back into use*
- E. Development that leads to less than substantial harm to the significance of a designated heritage asset will not be permitted, unless the public benefit of the proposal, including securing the optimum viable use of the site, outweigh the harm caused.*
- F. Proposals that sensitively and creatively bring designated heritage assets back into use whilst still maintaining their significance will be supported.*

#### *Policy 78*

##### *Listed Buildings*

- A. All proposals for listed buildings will be expected to conserve and enhance their appearance and significance.*
- B. Reinstatement of historic building elements (e.g. roof coverings, rainwater and soil goods, windows and doors) should be carried out using traditional, historic or original material, employing specialist advice and craftsmanship.*
- C. Extensions to listed buildings and new development within the curtilage of listed buildings should:*
- i. Be subservient to the host historic building in terms of location, floor area, height, massing and scale; and*
  - ii. Respect the host historic building in terms of design, materials and detailing; and*
  - iii. Respect the unity of groups of buildings (e.g. terraces) and the setting of nearby buildings; and*
  - iv. Respect the historic character and extent of the curtilage in relation to the amount of garden or other open space.*
- D. Proposals for the change of use of a listed building will only be permitted where it can be demonstrated that the proposed use is the optimum viable use, which causes the least harm to the significance of the building and its setting and secures its long term viability. Proposals that sensitively reuse listed buildings*

*where original use has ceased and is no longer viable will be looked on favourably.*

- E. Proposals for the demolition of listed buildings will only be permitted in exceptional circumstances. The fact a building has become derelict will not in itself be sufficient reason to permit its demolition or any substantial harm to its special interest.*
- F. The Council will continue to work with Historic England in identifying listed buildings and structures that merit inclusion on the Heritage at Risk Register. Where such buildings are identified, the Council will work proactively with owners and other bodies to facilitate their successful restoration and reuse, consistent with their heritage value and special interest.*

#### *Policy 79*

##### *Conservation Areas*

*In order to preserve or enhance the borough's conservation areas, including their respective significance, character, appearances and settings, the Council will:*

- A. Permit development which preserves or enhances the character or appearance of the area.*
- B. Only permit the demolition of any building in a conservation area where it is clear that this would not have an adverse effect on the character or appearance of the area. In cases where demolition may be justified in accordance with national policy, consent to demolish will be given only when acceptable plans for redevelopment have been agreed.*
- C. Use Article 4 directions to raise awareness of good conservation practice and encourage property owners to implement appropriate improvements to properties and other heritage assets which preserve or enhance the character of conservation areas.*
- D. Preserve any tree which contributes to the character of the conservation area.*
- E. Identify and designate, where appropriate and with public consultation, new conservation areas in the borough.*
- F. Appraise and reassess the borough's existing conservation areas, periodically reviewing character appraisals and management plan documents.*

#### *Policy 80*

##### *Archaeological Priority Zones*

*Proposals which affect Archaeological Priority zones will be supported where they provide:*

- A. Details of measures that will protect and, where appropriate better reveal, remains of archaeological importance by ensuring acceptable methods are used, proportionate to the significance of*

*the asset. This will include preserving the asset and its setting, including physical preservation in situ where appropriate.*

- B. Desk-based assessments will be required for proposals within designated Archaeological Priority Zones to evaluate impacts on any below ground archaeology. Further investigation works, including trial pits, may also be required.*
- C. In cases where loss of the asset is justified in accordance with national policy, the remains should be appropriately recorded, assessed, analysed, disseminated and the archive deposited.*

#### *Policy 81*

##### *Non-Designated Heritage Assets*

- A. Non-designated heritage assets will be protected and conserved appropriate to their significance, with a strong presumption in favour of their retention and sympathetic maintenance and enhancement.*
- B. Substantial harm and complete loss of non-designated heritage assets will not be supported.*

#### *Policy 82*

##### *Locally-Listed Buildings*

- A. The Council will seek to protect and retain locally listed buildings, recognising their architectural and historic interest that makes them significant to the borough.*
- B. Total loss of locally listed buildings will be strongly resisted, with clear and robust justification required for demolition.*
- C. Alterations or extensions to locally listed buildings will be expected to achieve a high standard of design, paying close attention to the special interest of the locally listed building and its setting.*

### [Other Relevant Policy, Standards & Guidance](#)

12.25 The NPPF and PPG are additionally supported by four Good Practice Advice (GPA) documents published by Historic England, including GPA 1: The Historic Environment in Local Plans<sup>x</sup>, GPA 2: Managing Significance in Decision-Taking in the Historic Environment<sup>xi</sup> (both published March 2015) and GPA 4 Enabling Development and Heritage Assets (June 2020). The second edition of GPA3: The Setting of Heritage Assets was published in December 2017<sup>xii</sup> and sets out the following stepped approach which should be taken to the assessment of impacts on the significance (in NPPF terms) of heritage assets:

- Step 1: Identify heritage assets that will be impacted, and the significance of these assets;

- Step 2: Assess whether, how and to what degree their settings make a contribution to the significance of the heritage asset(s);
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: Explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: Make and document the decision and monitor outcomes.

12.26 English Heritage's Conservation Principles, Policy and Guidance document was published in 2008<sup>xiii</sup> and states that in order to identify the significance (in NPPF terms) of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

- who values the place, and why they do so;
- how those values relate to its fabric;
- their relative importance;
- whether associated objects contribute to them;
- the contribution made by the setting and context of the place;
- how the place compares with others sharing similar values.

12.27 This chapter has been prepared in accordance with the standards and guidance issued by the CIfA<sup>xiv</sup>, the requirements of the EIA Regulations, guidance in the NPPF and the PPG, Historic England (HE) guidance, Greater London Archaeological Advisory Service (GLAAS) guidance, and current best practice.

### **Assessment Methodology**

12.28 This section of this ES chapter presents the following:

- Information sources that have been consulted throughout the preparation of this chapter;
- Details of consultation undertaken with respect to archaeology and built heritage;
- The methodology behind the assessment of effects on archaeological and built heritage assets, including the criteria for the determination of sensitivity of receptor and magnitude of change from the existing 'baseline' condition;
- An explanation as to how the identification of heritage assets and assessment of potential archaeology effects has been reached; and
- The significance criteria and terminology for the assessment of archaeology and built heritage assets residual effects.

12.29 The following sources of information that define the Development have been reviewed and form the basis of the assessment of likely significant effects on archaeology and built heritage assets:

- Design plans, including sections and elevations.

#### Methodology for Determining Baseline Conditions and Sensitive Receptors

12.30 No standard EIA methodologies exist for heritage and archaeological assessment. However, assessment methodology has been guided by various published documents including: English Heritage's Conservation Principles, Policy and Guidance, the Historic Environment Good Practice Advice Planning Advice Note 3 and the Design Manual for Roads and Bridges 2019<sup>xv</sup>. Although the latter was designed as best-practice for road schemes in particular, it is accepted as best-practice for the assessment of cultural heritage in relation to archaeology, listed buildings and historic landscapes.

12.31 The assessment is a qualitative one, and the evaluation of significance is ultimately a matter of professional judgement.

12.32 The three-stage approach presented below is adopted in order to reach an understanding of the level of any effect that a proposed development may have on a heritage asset. It is necessary to understand the significance of the asset and the proposed impacts on the asset to assess the overall effect on identified assets.

12.33 Using a matrix that measures both asset importance (significance in the context of NPPF terminology) and impact magnitude produces an assessment of the level of the effect of the Development on identified assets. This approach, including the matrices themselves, is set out below in Tables 12.1 – 12.3.

12.34 To inform this assessment, an archaeological desk based assessment (DBA) was prepared in June 2020, and a Built Heritage Baseline Assessment prepared in July 2020. These reports can be found in Appendices 12.1 and 12.2 respectively of this ES and provide further information on the baseline conditions at the Site.

12.35 The archaeological DBA included a review of below ground archaeological findspots, records and previous archaeological work within a 1km radius study area, as recommended by GLAAS guidelines, and relevant nationally designated archaeological assets within 1km of the centre

of the Site. This study area allowed the importance of known and likely archaeological assets features to be placed in their local, regional and national contexts.

12.36 With regard to built heritage a study area was identified as the basis for the identification and assessment of heritage assets, extending 1km from the Site for designated heritage assets and 500m for non-designated heritage assets. This scope is considered to be a proportionate approach to the assessment, based upon an understanding of the Site, local topography, existing urban development and the nature of the Development.

12.37 Archaeological heritage assets are recorded in national and/or local historic environment databases, in this instance the National Monuments Record and the Greater London Historic Environment Record (HER). Listed buildings are recorded as part of the National Heritage List for England, compiled by Historic England. Details of conservation areas (including conservation area appraisals) and locally listed buildings are compiled locally by the local planning authority. These data sources have been used in the preparation of this chapter and to inform the approach to mitigation for the Site. In accordance with national and local planning policy, this assessment considers both designated and undesignated heritage assets within the study area, including:

- World Heritage Sites;
- Scheduled Monuments;
- Registered Battlefields;
- Registered Parks/Gardens;
- Listed Buildings
- Conservation Areas;
- Locally Listed Buildings;
- The Historic Landscape; and
- Archaeological Remains.

12.38 Listed below are the main sources consulted during the compilation of the baseline information:

- British Library;
- GLAAS;
- Greater London HER;
- Historic England National Heritage List;
- The National Archives; and
- Waltham Forest Local Record Office; and

- London Borough of Waltham Forest online sources (conservation areas and locally listed buildings).

### Methodology for Determining Construction Effects

- 12.39 This assessment considers the nature, scale and significance of the effects to identified built heritage and potential archaeological assets that will arise during the construction phase, with the effects defined on the basis of any changes compared to the baseline (i.e. the conditions which would exist if the proposals did not go ahead). The criteria for the assessment are outlined in Tables 12.1 to 12.3.
- 12.40 There are no known heritage assets within the Site. The scale of the Development indicates that any buried archaeological remains which may be present within the Site would be unlikely to survive the construction process within the footprint of proposed development works.
- 12.41 With regard to built heritage assets anticipated construction effects would be indirect, short term and temporary. Potential effects on the setting of heritage assets include construction noise, dust or vibration, in addition to visual effects. Visual effects may relate to the presence of construction equipment (including any cranes) and hoardings in the short term and these views would change as the construction phase progress.
- 12.42 Accordingly, this assessment considers the following potential effects:
- Direct effects on buried archaeological remains; and
  - Indirect effects on the settings of nearby heritage assets and archaeological remains.

### Methodology for Determining Operational Effects

- 12.43 It is only during the construction phase that any direct effects on archaeological assets will occur; no direct impacts are identified once the Development is complete and occupied. Where relevant, indirect effects on the settings of relevant nearby heritage assets and archaeological remains once the Development is complete and occupied have been considered.
- 12.44 With regard to built heritage potential operational effects are related primarily to visual effects on the settings of identified built heritage assets, since there would not be undue noise, vibration or odour associated with a residential led mixed-use scheme

### Significance Criteria

### Receptor Importance

- 12.45 Receptors are either known designated or non-designated heritage assets or a perceived potential for archaeological heritage assets.
- 12.46 There are no national government guidelines for evaluating the significance of different types of heritage asset. For archaeological remains, the Department for Culture, Media and Sport has adopted a series of criteria<sup>xvi</sup> for use in the determination of national importance when scheduling monuments. The criteria include period, rarity, documentation, group value, survival / condition, fragility / vulnerability, diversity and potential and can be used as a basis for the assessment of the importance of archaeological sites and remains. However, the document also states that these principles '*should not be considered definitive, but as indicators that contribute to a broader judgment based on individual circumstances.*' Listed buildings are designated by the Secretary of State (based on recommendations from Historic England) for their special architectural or historic interest. Conservation Areas are designated locally for special architectural or historic interest. Locally listed buildings are also designated locally, based upon local criteria which identify built heritage assets which do not meet the requirements for statutory designation, but which retain a local degree of interest. The NPPF and the PPG introduce criteria for the assessment of the significance of heritage assets and these have been factored into this assessment.
- 12.47 The importance of a heritage asset can be defined as of International, National, Regional/County, Local or No Importance. The criteria to establish the importance of heritage assets are described in Table 12.1.

**Table 12.1: Significance Criteria for Evaluating Importance of Heritage Assets**

Importance / Sensitivity	Description
International/Very High	World Heritage Sites Assets of acknowledged international significance Assets that can contribute significantly to acknowledged international research objectives
National/High	Scheduled Monuments Undesignated assets of schedulable quality Assets that can contribute significantly to acknowledged national research objectives Listed Buildings – Grade I, II* or II Conservation Areas – containing very important listed buildings
Regional/Medium	Designated or undesignated assets (including historic landscape) that contribute to regional research objectives Conservation Areas - containing buildings that contribute significantly to their historic character

Local/Low	Undesignated assets (including historic landscape) of local significance Assets compromised by poor preservation and/or poor survival of contextual associations Assets of limited importance, but with potential to contribute to local research objectives Locally Listed Buildings
None/Negligible	Assets with very little or no surviving interest

### *Magnitude of Impact*

12.48 The magnitude of impact is assessed without regard to the importance of the asset. In terms of the judgment of the magnitude of impact this is based on the principle (established in the NPPF) that preservation of the asset and its setting is preferred, and that total physical loss of the asset is the least preferred. Determining the magnitude of impact is based on an understanding of how, and to what extent, the Development would impact on the buried archaeological assets and the setting of built heritage assets. The magnitude of impact is rated as High, Medium, Low and Negligible.

12.49 The survival of archaeological remains is often uncertain without archaeological evaluation and in these circumstances the magnitude of impact can only be estimated or stated as unknown. The magnitude of change resulting from the impact may vary depending on the nature of past development or management effects (e.g. extent of truncation and made ground and the various forms of impact).

12.50 Impacts can be direct and indirect:

- **Direct impacts:** are defined as an impact caused by an action, which generally occurs at the same time and place as that action. They are generally associated with the construction, operation or maintenance of a facility or activity and are usually obvious or quantifiable; and
- **Indirect impacts:** are defined as changes resulting from primary impacts. These changes include impacts to the setting of assets; effects can be short or long term depending on their persistence or duration.

12.51 The criteria for assessing the magnitude of impact are set out in Table 12.2.

**Table 12.2: Criteria for Assessing the Magnitude of Impacts**

Magnitude	Direct Impacts	Indirect Impacts
High	Change to most or all key archaeological materials or built heritage assets, such that the resource is totally altered	Radical transformation of the setting of an archaeological monument or built heritage asset.
Medium	Changes to many key archaeological materials or built heritage assets, such that the resource is clearly modified.	Considerable changes to setting that affect the character or importance of the asset.

Low	Changes to key archaeological materials or built heritage assets, such that the asset is slightly altered.	Minor change to the setting of an archaeological monument or built heritage asset.
Negligible	No impact from changes in use, amenity or access. No change in the ability to understand and appreciate the resource and its historical context and setting.	No perceptible change in the setting of an archaeological monument or built heritage asset.

### *Effect Scale and Significance*

12.52 The assessment of effects is a combination of the importance and sensitivity of the heritage asset (Table 12.1) and the magnitude of impact on that asset (Table 12.2). Effects can be adverse or beneficial and temporary or permanent. It should be noted that effects to archaeology largely arise from the construction phase and that, in the case of archaeology, such effects are often permanent and non-reversible. Adverse effects are those that create or amplify existing or new impacts upon the importance/sensitivity of heritage assets or their setting and remove or limit the ability to understand and appreciate the importance of the heritage asset. Beneficial effects are those that mitigate existing impacts and help to restore or enhance the importance/sensitivity of heritage assets or their setting, therefore allowing for greater understanding and appreciation of it. Effects that are moderate or above are considered significant in EIA terms. Table 12.3 presents a matrix that demonstrates how the scale of effect has been assessed.

**Table 12.3: Scale of Effect Matrix**

<b>Importance/ Sensitivity</b>	<b>International/ Very High</b>	Major	Major	Moderate/ Major	Moderate	No Impact
	<b>National/High</b>	Major	Major/ Moderate	Moderate/ Minor	Minor	
	<b>Regional/ Medium</b>	Moderate	Minor/ Moderate	Minor	Negligible	
	<b>Local/Low</b>	Minor/ Moderate	Minor	Negligible	Negligible	
	<b>None/ Negligible</b>	Negligible	Negligible	Negligible	Negligible	
		High	Medium	Low	Negligible	
<b>MAGNITUDE OF IMPACT</b>						

12.53 Effects that are identified as Moderate/Major or Moderate/Minor require professional judgement to determine the Scale of Effect.

12.54 Effects that are identified as moderate or major adverse/beneficial are considered to be 'significant' effects, whilst those that are identified as negligible or minor adverse/beneficial are considered to be 'not significant' effects.

### Consultation

- 12.55 The GLAAS provided a consultation response (Appendix 12.3) to an EIA scoping opinion in their role as advisors to LBWF. An up to date Archaeological DBA, informed by site geotechnical and topographic data, was requested to inform this chapter, which is found at Appendix 12.1.
- 12.56 With regard to built heritage, HE's advice requiring an expanded definition of heritage asset types was fully addressed further to the completion of the Built Heritage Baseline Assessment (Appendix 12.2).

### Limitations and Assumptions

- 12.57 The assessment of the scale of effects is based on extensive professional experience gained on other major developments across London and the south of England.
- 12.58 The assessment assumes the accuracy of the available datasets reviewed in its compilation. The archaeological DBA undertaken to support this ES Chapter was undertaken in June 2020 and the Built Heritage Assessment was undertaken in July 2020, including a range of both desk and site-based assessment.
- 12.59 The information presented in this ES chapter and the technical appendix (Appendix 12.1, Archaeological DBA) provide an indication of below ground archaeological assets present or likely to be present, rather than a definitive list of all assets likely to be present, as the full extent of below ground archaeological assets cannot be known prior to site-specific archaeological field investigation.
- 12.60 The principal limitation to the assessment of effects upon below ground heritage assets is the nature of the archaeological resource, which is buried and therefore not visible. This means it can be difficult to accurately predict the presence and likely importance of below ground heritage assets, and the likely impact (and resultant effects) of the Development upon such assets.

## Baseline Conditions

### Existing Baseline Conditions

- 12.61 The current baseline conditions are informed by the Archaeological DBA and Built Heritage Baseline Assessment (both undertaken 2020), which are appended as Appendices 12.1 and 12.2 of this ES respectively. A summary of the assessments is presented below. The archaeological results are summarised (where relevant) by archaeological periods, as follows:

**Table 12.4: Archaeological Time Periods**

<b>Prehistoric</b>	
Palaeolithic	900,000 - 12,000 BC
Mesolithic	12,000 - 4,000 BC
Neolithic	4,000 - 1,800 BC
Bronze Age	1,800 - 600 BC
Iron Age	600 - AD 43
<b>Historic</b>	
Roman	AD 43 - 410
Anglo-Saxon / Early Medieval	AD 410 - 1066
Medieval	AD 1066 - 1485
Post Medieval	AD 1486 - 1799
Modern	AD 1800 - Present

### Archaeology Baseline

- 12.62 There are no relevant nationally designated archaeological assets within the Site or in close proximity (National Heritage List, Historic England).
- 12.63 The Site is not located within an Archaeological Priority Zone as defined by LBWF.
- 12.64 The underlying geological sequence across a majority of the Site has been confirmed as made ground directly overlying the London Clay bedrock. It is possible that isolated and truncated survival of head deposits may be found along the Site's western boundary. No evidence for the survival of historic topsoils or subsoils has been identified anywhere within the Site during previous geotechnical work.
- 12.65 The GLHER records no non-designated archaeological assets within the Site. In general, the majority of GLHER records within the nearby area comprise evidence for dispersed Medieval and Post Medieval settlement within the area of Walthamstow. A concentration of World War Two (1939-45) defensive heritage assets is recorded at the North Circular Road c.850m to the north.

- 12.66 Historic mapping has demonstrated that the Site comprised areas of garden and open land until the 20<sup>th</sup> century when the Site was developed for an industrial use and for allotment gardens.
- 12.67 The assessment concluded that the Site retains a generally low archaeological potential for all past periods of human activity.
- 12.68 Past development impacts at the Site are likely to have been severe. Extensive depths of made ground are shown across the Site by previous geotechnical data with no survival shown for a topsoil/subsoil sequence. Accordingly, it is considered that these impacts will have greatly reduced the archaeological potential of the Site.
- 12.69 Overall, given the Site's limited archaeological potential and the extent of past ground disturbance, it was concluded that the Development would be unlikely to have either a widespread or significant archaeological impact. If archaeological remains were present within the Site, these were considered most likely to be of a local/low importance.
- 12.70 The potential for archaeological remains to be encountered within the Site, as well as likely past development impacts, is discussed in full in Appendix 12.1.

#### Built Heritage Baseline

- 12.71 The Site contains no built heritage assets, nor is it located within a conservation area. The defined study area around the Site includes eleven listed buildings (one Grade II\* and ten Grade II), two conservation areas and five locally listed buildings. In its current form the Site does not contribute positively to the settings of any of these identified heritage assets, given its poor townscape quality.
- 12.72 The closest heritage asset to the Site boundary is the Wood Street Library, with Woodside Junior School in proximity to the south; both are locally listed buildings. These buildings are associated with the context of Wood Street, a local commercial hub. Further to the south on Wood Street is the Old Butcher's Shop adjacent to Number 76 (Grade II) and St Gabriel's Church (locally listed building) is located just off this street to the west. There is a large group of listed buildings within the study area to the west of the Site at Waltham Forest Town Hall. There are additional individual heritage assets spaced across the study area, including Walthamstow School (Grade II\*) and Thorpe Coombe Hospital (Grade II), in some proximity to Forest Road. To the north of the Site is the Hawker Siddley Power Transformers building (offices only), a locally listed building. Two conservation areas fall within the study area, but

fall at the outer edges of the study area, along with one further listed building at St Peter in the Forest Church (Grade II).

### Receptors and Receptor Importance

12.73 Table 12.5 below details the known built heritage and archaeological assets, and potential archaeological resources identified within the Site from the Historic England National Heritage for England (NHLE) List, LBWF, the Greater London HER, from the DBA, and the built heritage assessment.

**Table 12.5: Heritage Resources and their Importance**

Baseline Evidence	Description of Resource/Asset and Potential	Comment	Importance/Sensitivity
DBA	Low Potential for encountering Early Prehistoric flintwork, if present would comprise residual, isolated material from truncated head deposits in the far west of the site	Potential for Non-designated Heritage Asset	Local/Low
DBA	Low Potential for Later Prehistoric occupation and associated activity across the site	Potential for Non-designated Heritage Asset	Local/Low
DBA	Low Palaeoenvironmental potential associated with thin band of isolated alluvium identified at western boundary	Non-designated Heritage Asset	Local/Low
DBA	Low Potential for Roman activity	Potential for Non-designated Heritage Asset	Local/Low
DBA	Low Potential for Saxon and Medieval settlement and occupation activity	Potential for Non-designated Heritage Asset	Local/ Low
DBA	Low Potential for Post Medieval settlement, if present Post Medieval would more likely comprise agricultural activity and land division	Potential for Non-designated Heritage Asset	None/Negligible to Local/Low
DBA	Good Potential for survival of Modern foundations and allotment activity	Non-designated Heritage Asset	None/Negligible
NHLE	Thorpe Coombe Hospital (Original House Only)	Listed Building	National/High
NHLE	Old Butchers Shop adjacent to Number 76	Listed Building	National/High
NHLE	Walthamstow House (Corpus Christi School)	Listed Building	National/High
NHLE	Assembly Hall to SE of Town Hall	Listed Building	National/High
NHLE	War Memorial, Waltham Forest Town Hall	Listed Building	National/High
NHLE	Walthamstow Town Hall	Listed Building	National/High
NHLE	Brookcroft	Listed Building	National/High
NHLE	Gates, gatepiers and railings at Walthamstow Civic Centre	Listed Building	National/High
NHLE	Walthamstow Civic Centre pair of flagpoles in forecourt to south of centre	Listed Building	National/High
NHLE	Walthamstow Civic Centre 8 pairs of gatepiers in forecourt to south of centre	Listed Building	National/High
NHLE	Church of St Peter in the Forest	Listed Building	National/High
LBW	St Mary's Church, Walthamstow Village Conservation Area	Conservation Area	Regional/Medium
LBW	Forest School Conservation Area	Conservation Area	Regional/Medium

Baseline Evidence	Description of Resource/Asset and Potential	Comment	Importance/Sensitivity
LBW	Wood Street Library	Locally Listed Building	Local/Low
LBW	Woodside Junior School	Locally Listed Building	Local/Low
LBW	Hawker Siddley Power Transformers (offices only)	Locally Listed Building	Local/Low
LBW	St Gabriel's Church	Locally Listed Building	Local/Low
LBW	Waltham Forest College	Locally Listed Building	Local/Low

12.74 No archaeological receptors are being introduced as part of the Development.

### Environmental Design and Management

12.75 If required, potential significant archaeological impacts will be offset through appropriate mitigation measures as agreed with LBWF. Any mitigation measures will be undertaken as best practice determines and will comprise measures to preserve the archaeological resource by record prior to any significant impacts.

### Future Baseline

12.76 The baseline conditions for below ground archaeology at the Site are not likely to change unless the Site is subject to redevelopment.

12.77 With regard to built heritage, the future baseline (i.e. without the Development) would not alter unless the Site is subject to redevelopment.

### Likely Significant Effects

#### Construction Phase

12.78 This section identifies and assesses the likely effects on relevant heritage and archaeological assets during the demolition and construction phase of the Development. The potential effects, and the significance of the effects on the assets, are characterised in the absence of mitigation measures.

12.79 Works during the demolition and construction phase, that could include the cutting/piling of new foundations, the construction of roads, and the installation of services and sub-surface water drainage, could damage and destroy the archaeological resource at the Site.

- 12.80 With regard to built heritage, the principal expected construction effects would be views of the Site and indirect effects on the setting of some heritage assets. These visual effects would include the presence of construction equipment (including any cranes) and hoardings in the short term and these views would change as the construction phase progresses.
- 12.81 The assessment of the impact of demolition and construction works is based on the knowledge regarding nearby built heritage assets, the Site's archaeological remains and assumed construction impacts, as set out above. Based on those assumed demolition and construction impacts, the likely impacts are summarised in Table 12.6.

**Table 12.6: Assessment of Likely Construction Phase Impacts**

Construction Activity	Assessed Magnitude of Impact
Site set-up works, including contractors compound set-up and associated temporary services, levelling work and other preparatory groundworks	Low Direct
Demolition of extant structures, including grubbing out of existing foundations	High Direct
Site strip in advance of construction	High Direct
Construction, including foundation excavation or pile installation, service installation, road construction	High Direct
Landscaping, including ground reduction or levelling and creation of attenuation tanks and ponds	Low to Medium Direct
Compression of buried remains from vehicle movement, construction of spoil tips, bunds or raised landscape areas	Low Direct
Views of construction site from nearby assets, with associated noise and possible dust and vibration	Low Indirect

- 12.82 It has been concluded for the purpose of this assessment that where any below ground heritage assets are present within the Site and remain intact, these will most likely be of a generally Local or Negligible Importance in the context of the Secretary's non-statutory criteria for Scheduled Monuments.
- 12.83 It is considered likely the effects to below ground heritage assets as a result of the demolition and construction activities will be adverse in nature given the disturbance of any below ground remains which may be present within the Site. These effects will be limited to the Site and will be permanent and irreversible.
- 12.84 Any effects as a result of demolition and construction activities on relevant known designated archaeological assets and non-designated below ground archaeological remains outside of the Site will be negligible (insignificant).
- 12.85 The closest built heritage asset to the Site is Wood Street Library, a locally listed building which sits at the junction with Forest Road. Its position on a corner plot would result in it experiencing views and noise of construction in close proximity. Whilst these effects would

be regarded as significant in EIA terms, these effects would be short term and temporary. With regard to other built heritage assets, there would be indirect effects of varying magnitude on their respective settings, reducing in magnitude with increased distance from the Site boundary.

- 12.86 An evaluation of the predicted impacts during construction and subsequent nature, scale and significance of effects is provided in Table 12.7.

**Table 12.7: Evaluation of Predicted Impacts During Construction Phase**

Heritage Resource Description	Importance/ Sensitivity	Magnitude of Impact	Scale of Effect
Low Potential for encountering Early Prehistoric flintwork, if present would comprise residual, isolated material from truncated head deposits in the far west of the site	Local/Low	High Direct	Minor Adverse
Low Potential for Later Prehistoric occupation and associated activity across the site	Local/Low	High Direct	Minor Adverse
Low Palaeoenvironmental potential associated with thin band of isolated alluvium identified at western boundary	Local/Low	High Direct	Minor Adverse
Low Potential for Roman activity	Local/Low	High Direct	Minor Adverse
Low Potential for Saxon and Medieval settlement and occupation activity	Local/ Low	High Direct	Minor Adverse
Low Potential for Post Medieval settlement, if present Post Medieval would more likely comprise agricultural activity and land division	None/Negligible to Local/Low	High Direct	Minor Adverse / Negligible
Good Potential for survival of Modern foundations and allotment activity	None/Negligible	High Direct	Negligible
Thorpe Coombe Hospital (Original House Only)	National/High	Low Indirect	Minor Adverse
Old Butchers Shop adjacent to Number 76	National/High	Low Indirect	Minor Adverse
Walthamstow House (Corpus Christi School)	National/High	Low Indirect	Minor Adverse
Assembly Hall to SE of Town Hall	National/High	Low Indirect	Minor Adverse
War Memorial, Waltham Forest Town Hall	National/High	Low Indirect	Minor Adverse
Walthamstow Town Hall	National/High	Low Indirect	Minor Adverse
Brookcroft	National/High	Low Indirect	Minor Adverse
Gates, gatepiers and railings at Walthamstow Civic Centre	National/High	Low Indirect	Minor Adverse
Walthamstow Civic Centre pair of flagpoles in forecourt to south of centre	National/High	Low Indirect	Minor Adverse
Walthamstow Civic Centre 8 pairs of gatepiers in forecourt to south of centre	National/High	Low Indirect	Minor Adverse
Church of St Peter in the Forest	National/High	No Impact	No Impact
St Mary's Church, Walthamstow Village Conservation Area	Regional/Medium	No Impact	No Impact
Forest School Conservation Area	Regional/Medium	No Impact	No Impact
Wood Street Library	Local/Low	High Indirect	Moderate Adverse

Heritage Resource Description	Importance/ Sensitivity	Magnitude of Impact	Scale of Effect
Woodside Junior School	Local/Low	Medium Indirect	Minor Adverse
Hawker Siddley Power Transformers (offices only)	Local/Low	Low Indirect	Negligible
St Gabriel's Church	Local/Low	Low Indirect	Negligible
Waltham Forest College	Local/Low	Low Indirect	Negligible

12.87 The range of importance/sensitivity of known or potential archaeological assets is generally anticipated to vary from Local/Low to None/Negligible. The magnitude of impact is considered to be High Direct upon any archaeological remains within the footprint of the Development as these are likely to be directly impacted and unlikely to survive the demolition and construction process. It is considered that any indirect impacts upon relevant archaeological assets outside of the site will be Negligible.

12.88 Professional judgement has subsequently been applied and the construction of the Development is therefore assessed as likely having a generally permanent **minor adverse to negligible** effect on archaeological remains. These effects would not be considered significant.

12.89 One locally listed building, Wood Street Library, would experience **moderate adverse effects** arising from construction which would be regarded as significant, based upon proximity to the Site on the corner plot at the northern end of Wood Street, but these effects would be **short term and temporary**. No other built heritage assets would experience effects arising from the construction phase which would be regarded as significant.

#### Completed Development

12.90 This section identifies and assesses the likely effects on built heritage and archaeological assets once the Development is complete and occupied.

#### Direct Impacts

12.91 The Development, once completed and occupied, will not have any effect on archaeological remains within the Site as it has been assumed that the construction phase of the Development will have disturbed any remains which may be present as a result of excavation, earthworks and other below ground construction activities. Consequently, no additional direct effects will occur to relevant archaeological assets during this phase.

12.92 There will be no direct effects to built heritage assets during the operational stage of the Development.

*Indirect Impacts*

- 12.93 Similar to the demolition and construction phase, it is considered that any indirect impacts on relevant archaeological assets outside of the Site once the Development is completed and occupied will be negligible.
- 12.94 With regard to built heritage, indirect and permanent operational effects will arise as a result of primarily visual effects on the settings of some of the identified heritage assets. These effects will include the replacement of the existing poor quality site with a high quality residential-led mixed use scheme, resulting in positive effects on the settings of the heritage assets. The taller height of the Development, compared with the existing single storey Homebase store, would result in notable changes to the settings of some heritage assets to varying degrees, but when considered in the local context these effects are considered to be broadly neutral with only limited adverse effects on the importance of the heritage assets.
- 12.95 Wood Street Library and Woodside Junior School, both locally listed buildings, would experience operational effects arising from the Development in some proximity to the north. Whilst broadly taller than the surrounding townscape, the Development would feature within an area of mixed development, including a number of twenty-first century residential blocks on Fulbourne Road. The Development would introduce changes to the settings of these locally listed buildings, with some minor adverse effects arising from the contrasting height of the taller elements, but given the low degree to which their wider settings outside of Wood Street contribute to their importance these adverse effects would be limited. Changes within the setting of the locally listed buildings would additionally include some beneficial effects, relating to the visual transformation of the Site from an area of poor townscape quality to a well-designed residential-led scheme with supporting landscaping strategy.
- 12.96 Listed buildings, including Thorpe Coombe Hospital, Walthamstow House, the Old Butchers Shop adjacent to Number 76, Brookscroft and listed buildings and structures at Waltham Forest Town Hall, may experience restricted long distance views towards the tower element of the Development which may result in some adverse effects relating to its contrasting height, but these views would be distant and with no more than a very low impact to their importance.
- 12.97 Table 12.8 outlines effects arising from the Development during its operational phase.

**Table 12.8: Evaluation of Predicted Impacts During Operational Phase**

Heritage Resource Description	Importance/ Sensitivity	Magnitude of Impact	Scale of Effect
Thorpe Coombe Hospital (Original House Only)	National/High	Low Indirect	Minor Adverse
Old Butchers Shop adjacent to Number 76	National/High	Low Indirect	Minor Adverse
Walthamstow House (Corpus Christi School)	National/High	Low Indirect	Minor Adverse
Assembly Hall to SE of Town Hall	National/High	Low Indirect	Minor Adverse
War Memorial, Waltham Forest Town Hall	National/High	Low Indirect	Minor Adverse
Walthamstow Town Hall	National/High	Low Indirect	Minor Adverse
Brookscroft	National/High	Low Indirect	Minor Adverse
Gates, gatepiers and railings at Walthamstow Civic Centre	National/High	Low Indirect	Minor Adverse
Walthamstow Civic Centre pair of flagpoles in forecourt to south of centre	National/High	Low Indirect	Minor Adverse
Walthamstow Civic Centre 8 pairs of gatepiers in forecourt to south of centre	National/High	Low Indirect	Minor Adverse
Church of St Peter in the Forest	National/High	No Impact	No Impact
St Mary's Church, Walthamstow Village Conservation Area	Regional/Medium	No Impact	No Impact
Forest School Conservation Area	Regional/Medium	No Impact	No Impact
Wood Street Library	Local/Low	Medium Indirect	Minor Adverse and Minor Beneficial
Woodside Junior School	Local/Low	Medium Indirect	Minor Adverse and Minor Beneficial
Hawker Siddley Power Transformers (offices only)	Local/Low	Low Indirect	Negligible
St Gabriel's Church	Local/Low	Low Indirect	Negligible
Waltham Forest College	Local/Low	Low Indirect	Negligible

## Mitigation Measures

### Construction Phase

- 12.98 Based upon the results of the baseline assessment, no further archaeological work is suggested in this particular instance. In the event that the LBWF and/or their archaeological advisor requests further archaeological work, it is considered that this could be secured by attaching an appropriately worded planning condition to the granting of planning consent.
- 12.99 If required, the location and extent of any archaeological mitigation will be discussed and agreed with LBWF and their archaeological advisor. Any requirement for mitigation by trial trenching and excavation will take place in advance of construction activities. Any requirement for a programme of archaeological monitoring during relevant construction groundworks would be undertaken during the construction phase of the Development.
- 12.100 A Construction Environmental Management Programme (CEMP) would be implemented for the Site to reduce the effects of construction on built heritage assets by the control of lighting, dust and defined construction hours (see Chapter 6 of the ES for full details). This has been

treated as embedded mitigation for the purposes of assessing magnitude of impact and thereby significance of effects of construction.

### Completed Development

12.101 No archaeological effects are anticipated at the operational stage and therefore no further mitigation measures are required.

12.102 Good quality design has been an integral part of the design process for the Development, including the application of a high-quality architectural design relating to form and materials, along with public realm benefits. In particular the landscaping works along the southern edge of the Site as part of the linear park will enhance the environs of Forest Road. This assessment considers these embedded mitigation measures for the purposes of assessing magnitude of impact and thereby significance of operational effects.

### Residual Effects

12.103 Residual effects are those that are predicted to remain after implementation of the mitigation measures described above. It is important to demonstrate that any measures included as part of the mitigation package to respond to adverse effects can be delivered in practice, the measures correspond with planning policy and therefore that there is confidence that they will be implemented.

12.104 There would be both beneficial and adverse minor effects arising from the Development relating to locally listed buildings at Wood Street Library and Woodside Junior School. There would be minor adverse effects to listed buildings at Thorpe Coombe Hospital, Walthamstow House, the Old Butchers Shop adjacent to Number 76, Brookcroft and listed buildings and structures at Waltham Forest Town Hall.

12.105 There will be no significant effects on archaeology as a result of the Development.

12.106 No further archaeological works are recommended. If required by the LBWF and their archaeological advisor, mitigation measures will be undertaken to preserve archaeological remains within the site by record, prior to any significant adverse effects. Appropriate archaeological fieldwork followed by dissemination of the acquired data would be considered a beneficial effect.

12.107 There will be no significant effects with regard to built heritage assets arising from the Development during its operational phase.

12.108 Table 12.10 at the end of this Chapter provides a summary of residual effects upon known and potential heritage assets resulting from the Development.

### Cumulative Effects

12.109 This section identifies and assesses the likely effects of the cumulative impacts from the development of surrounding cumulative developments on heritage and archaeological assets during the construction and operation phases, prior to the adoption of mitigation measures.

12.110 Table 12.9 identifies a number of consented and proposed schemes within a 1km radius of the Site, which are considered alongside the Development for potential cumulative effects upon the settings of identified heritage assets.

**Table 12.9: Schemes considered for cumulative effects**

Scheme Name and Application Number	Scheme Details	Planning Status	Approximate Distance from the Site
Ref: 200180 Block P5, P6 & P7 Marlowe Road Estate Marlowe Road Walthamstow E17 3HB	Internal alterations, and associated elevation and fenestration alterations to deliver 12 additional residential units in Blocks P5, P6, P7 within the Marlowe Road Estate Regeneration (98 total).	Valid	700m
Ref: 151652 Marlowe Estate	Demolition of the existing Marlowe Road Estate and phased redevelopment of the site comprising 436 residential units and commercial space in blocks ranging from two to seven storeys, along with car parking (208 spaces) and associated works.	Approved	
Ref: 192987 Land at Hylands Road	Demolition of existing buildings and construction of three buildings ranging from 4 to 9 storeys in height, comprising 120 affordable residential units with associated disabled and cycle parking spaces.	Approved	
Ref: 141145 Thorpe Coombe Hospital, Forest Road	Demolition of existing buildings on the site with the exception of Thorpe Coombe House building and construction of six blocks (ranging from 2 to 5 storey) to provide 91 residential units	Approved	

12.111 There may be some cumulative impacts on below ground archaeological receptors in general terms as a result of the interaction of the Development with other schemes. Indeed, it is acknowledged that any archaeological remains within the Site form part of a wider landscape of multi-period archaeological sites and monuments. However, given the generally isolated, small scale and localised nature of archaeological remains, no significant cumulative effects are identified in relation to below ground archaeological remains arising from the construction and operational phases of the Development.

12.112 Viewed cumulatively alongside the Development, it is considered that some of these schemes would fall within the setting of the Old Butcher's Shop adjacent to Number 76 (Grade II) and St Gabriel's Church (locally listed):

- Ref: 200180 Block P5, P6 & P7 Marlowe Road Estate; and,
- Ref: 151652 Marlowe Estate
- Ref: 192987 Land at Hylands Road

12.113 Application Ref 200180 relates to internal works and would not result in any cumulative effects to the settings of the identified heritage assets. Application Ref151562 and Application Ref 192987 are both large schemes existing in some proximity to the south and south east of the heritage assets. Both apply to regeneration of existing estates (Marlowe Estate) and replacement of council housing (Land at Hylands Road). Whilst there is some increase in building heights associated with these schemes, they overall represent minor visual enhancements to the wider settings of the Old Butcher's Shop adjacent to Number 76 (Grade II) and St Gabriel's Church (locally listed). There would not be significant cumulative effects arising from the schemes when considered alongside the Development, during either the construction or operational phases.

12.114 Viewed cumulatively alongside the Development, it is considered that one of these schemes would include new development within the immediate setting of Thorpe Coombe Hospital (Grade II):

- Ref: 141145 Thorpe Coombe Hospital, Forest Road

12.115 This application for Thorpe Combe Hospital comprises conversion of the listed building to residential units and redevelopment of adjacent hospital buildings with a residential scheme. Considering the direct effects of this scheme on the listed building alongside the indirect effects of the Development some distance to the north east, it is considered that there would not be cumulative effects on the significance of Thorpe Coombe Hospital arising from the schemes, either during the construction or operational phases.

### Summary

12.116 This Chapter has identified nearby heritage assets and summarised the archaeological baseline at the Site, including evidence garnered from the National Heritage List for England and during previous desk based assessment and built heritage assessment.

12.117 Table 12.10 contains a summary of the likely significant effects of the Development with regard to cultural heritage.

#### Archaeology Summary

12.118 No significant effects are considered upon nearby nationally designated heritage or archaeological assets.

12.119 A low archaeological potential for all past periods of human activity was identified during baseline study. It was assessed that any archaeological remains within the site would generally be considered of Local/Low or Negligible importance.

12.120 Demolition and construction activities would result in a High Direct impact upon archaeological remains if present within the footprint of below ground excavations associated with the construction of the Development.

12.121 Overall, it has been concluded that the Development would result in a generally Minor Adverse effect upon archaeological remains within the Site, which would not be considered a significant effect.

12.122 No further archaeological works are recommended in this particular instance. If required by the London Borough of Waltham Forest, archaeological mitigation measures would be agreed with the Borough and their archaeological advisor in advance of development, to ensure that any archaeological remains within the Site are appropriately preserved by record prior to any significant construction adverse effects. The archaeological investigation and appropriate dissemination of that data would be considered a beneficial effect.

#### Built Heritage Summary

12.123 The Built Heritage Baseline Assessment (Appendix 12.2) identifies built heritage assets with potential to be affected by changes within their setting arising from the Development, informed by both desk based study and on site assessment.

12.124 The Site contains no built heritage assets, nor is it located within a conservation area. The defined study area around the Site includes eleven listed buildings (two Grade II\* and ten Grade II), two conservation areas and five locally listed buildings. In its current form the Site does not contribute positively to the settings of any of these identified heritage assets, given its poor townscape quality.

- 12.125 Wood Street Library, a locally listed building, would experience significant effects arising during the construction phase of the Development, relating to noise and views of construction equipment, including cranes. These effects would be short term and temporary. No other built heritage assets would experience significant effects during construction.
- 12.126 In place of the existing, poor quality Site the Development would introduce a well-designed, residential led scheme which would include some taller elements rising above the prevailing townscape and within the settings of heritage assets within the study area. The contrasting height of the tower would have some minor adverse effects on the settings of some heritage assets, but in all cases it is sufficiently distant that these effects would not be regarded as significant.
- 12.127 Good quality design has been an integral part of the design process for the Development, including the application of a high quality architectural design relating to form and materials, along with public realm benefits, including in particular the linear park fronting Forest Road. The quality of the architectural design, supported with a landscaping strategy, assists to mitigate potentially adverse effects caused by the taller element of the scheme.
- 12.128 There will be no significant effects with regard to built heritage assets arising from the Development during its operational phase.

**Table 12.10: Table of Significance – Cultural Heritage**

Potential Effect	Nature of Effect (Permanent/Temporary)	Significance (Major/Moderate/Minor) (Beneficial/Adverse/Negligible)	Mitigation / Enhancement Measures	Geographical Importance*							Residual Effects (Major/Moderate/Minor) (Beneficial/Adverse/Negligible)
				I	UK	E	R	C	B	L	
<b>Construction</b>											
Low Potential for encountering Early Prehistoric flintwork, if present would comprise residual, isolated material from truncated head deposits in the far west of the site	Permanent	Minor Adverse	N/A							X	Minor Adverse
Low Potential for Later Prehistoric occupation and associated activity across the site	Permanent	Minor Adverse								X	Minor Adverse
Low Palaeoenvironmental potential associated with thin band of isolated alluvium identified at western boundary	Permanent	Minor Adverse								X	Minor Adverse
Low Potential for Roman activity	Permanent	Minor Adverse								X	Minor Adverse
Low Potential for Saxon and Medieval settlement and occupation activity	Permanent	Minor Adverse								X	Minor Adverse
Low Potential for Post Medieval settlement, if present Post Medieval would more likely comprise agricultural activity and land division	Permanent	Minor Adverse / Negligible								X	Minor Adverse / Negligible
Good Potential for survival of Modern foundations and allotment activity	Permanent	Negligible								X	Negligible
Thorpe Coombe Hospital (Original House Only)	Temporary	Minor Adverse	CEMP			X					Minor Adverse
Old Butchers Shop adjacent to Number 76	Temporary	Minor Adverse				X					Minor Adverse
Walthamstow House (Corpus Christi School)	Temporary	Minor Adverse				X					Minor Adverse
Assembly Hall to SE of Town Hall	Temporary	Minor Adverse				X					Minor Adverse
War Memorial, Waltham Forest Town Hall	Temporary	Minor Adverse				X					Minor Adverse
Walthamstow Town Hall	Temporary	Minor Adverse				X					Minor Adverse
Brookcroft	Temporary	Minor Adverse				X					Minor Adverse
Gates, gatepiers and railings at Walthamstow Civic Centre	Temporary	Minor Adverse			X					Minor Adverse	

Potential Effect	Nature of Effect (Permanent/ Temporary)	Significance (Major/Moderate/Minor) (Beneficial/Adverse/ Negligible)	Mitigation / Enhancement Measures	Geographical Importance*							Residual Effects (Major/Moderate/ Minor) (Beneficial/Adverse/ Negligible)	
				I	UK	E	R	C	B	L		
Walthamstow Civic Centre pair of flagpoles in forecourt to south of centre	Temporary	Minor Adverse	CEMP			X					Minor Adverse	
Walthamstow Civic Centre 8 pairs of gatepiers in forecourt to south of centre	Temporary	Minor Adverse				X						Minor Adverse
Wood Street Library	Temporary	Moderate Adverse							X			Moderate Adverse
Woodside Junior School	Temporary	Minor Adverse							X			Minor Adverse
Hawker Siddley Power Transformers (offices only)	Temporary	Minor Adverse								X		Minor Adverse
St Gabriel's Church	Temporary	Minor Adverse								X		Minor Adverse
Waltham Forest College	Temporary	Minor Adverse								X		Minor Adverse
<b>Completed Development</b>												
Thorpe Coombe Hospital (Original House Only)	Permanent	Minor Adverse	High quality design			X					Minor Adverse	
Old Butchers Shop adjacent to Number 76	Permanent	Minor Adverse				X						Minor Adverse
Walthamstow House (Corpus Christi School)	Permanent	Minor Adverse				X						Minor Adverse
Assembly Hall to SE of Town Hall	Permanent	Minor Adverse				X						Minor Adverse
War Memorial, Waltham Forest Town Hall	Permanent	Minor Adverse				X						Minor Adverse
Walthamstow Town Hall	Permanent	Minor Adverse				X						Minor Adverse
Brookcroft	Permanent	Minor Adverse				X						Minor Adverse
Gates, gatepiers and railings at Walthamstow Civic Centre	Permanent	Minor Adverse				X						Minor Adverse
Walthamstow Civic Centre pair of flagpoles in forecourt to south of centre	Permanent	Minor Adverse				X						Minor Adverse
Walthamstow Civic Centre 8 pairs of gatepiers in forecourt to south of centre	Permanent	Minor Adverse				X						Minor Adverse
Wood Street Library	Permanent	Minor Adverse and Minor Beneficial	High quality design						X		Minor Adverse and Minor Beneficial	
Woodside Junior School	Permanent	Minor Adverse and Minor Beneficial								X		Minor Adverse and Minor Beneficial

Potential Effect	Nature of Effect (Permanent/ Temporary)	Significance (Major/Moderate/Minor) (Beneficial/Adverse/ Negligible)	Mitigation / Enhancement Measures	Geographical Importance*							Residual Effects (Major/Moderate/ Minor) (Beneficial/Adverse/ Negligible)
				I	UK	E	R	C	B	L	
Hawker Siddley Power Transformers (offices only)	Permanent	Negligible	High quality design						X		Negligible
St Gabriel's Church	Permanent	Negligible							X		Negligible
Waltham Forest College	Permanent	Negligible							X		Negligible
<b>Cumulative Effects</b>											
<i>Construction</i>											
No cumulative effects during construction											
<i>Operation</i>											
No cumulative effects during operation											

**\* Geographical Level of Importance**

I = International; UK = United Kingdom; E = England; R = Regional; C = County; B = Borough; L = Local

## REFERENCES

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- ii UK Government, Planning (Listed Buildings and Conservation Areas) Act 1990
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- iv CLG (March 2014) Planning Practice Guide
- v London Plan - the Spatial Development Strategy for London, Consolidated with Alterations Since 2011 (March 2016).
- vi The London Plan Intend to Publish (December 2019)
- vii London Borough of Waltham Forest Core Strategy document, adopted March 2012
- viii Borough's Local Plan Development Management Policies, adopted in October 2013
- ix Waltham Forest Local Plan 2020-2035 draft consultation version July 2019
- x Historic England, (2015); Historic Environment Good Practice Advice in Planning: 1 The Historic Environment in Local Plans.
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