

STATEMENT OF COMMON GROUND

BETWEEN

THE NORTH LONDON BOROUGHES

AND

HISTORIC ENGLAND

This Statement of Common Ground has been prepared to identify areas of agreement between the Boroughs working on the North London Waste Plan (“the North London Boroughs”) and Historic England. The North London Boroughs are Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The Statement of Common Ground is on matters relating to Historic England’s representations on the Proposed Submission North London Waste Plan (2019) to assist the Inspector during the examination of the North London Waste Plan.

Historic England representations

Historic England’s representations relate to information on historic assets in the Area profiles and textual changes to Policy 5.

Historic England’s representations are set out in full in Appendix A, alongside the section of the NLWP they refer to.

Areas of Agreement

The proposed modifications to the Proposed Submission NLWP set out in Appendix B are sufficient to meet Historic England’s points made in representations 10-1/2 and 10-2/2.

Signed on behalf of the North London Boroughs

Signed on behalf of Historic England



Signed:
Archie Onslow
Programme Manager, North London Waste Plan
Date:

Signed:
Tim Brennan
Historic Environment Planning Adviser
London & South East Region
Historic England
Date:

Appendix A: Representations from Historic England

Code	Section	Policy / Para	Representation
10-1/2	Appendix 2	Area Profiles	<p>Thank you for the opportunity to comment on the consultation draft of the North London Waste Plan (NLWP). 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.</p> <p>We note the background against which the NLWP is being prepared as set out at paragraph 1.6, including the requirements of the National Planning Policy Framework (NPPF) and the National Planning Policy for Waste (NPPW). It is against these requirements that our comments are made.</p> <p>As with our response to the previous consultation on the Plan (a copy of which is attached elsewhere to this letter), we have some concerns as to how historic environment considerations are dealt with. As such, we would suggest that as set out, the Plan may fall short of the NPPF tests of soundness, particularly in regard to its conformity with national policy.</p> <p>Paragraph 31 of the NPPF requires that the preparation of local plans and the policies within them should be ‘underpinned by relevant and up-to-date evidence’. In the case of the North London Waste Plan, such an evidence base would help ensure appropriate assessment of any heritage assets potentially affected in the selection of a particular site for a waste-related development. While we note clause f) in policy 5, there does not appear to have been any assessment of archaeological issues in relation to the sites proposed to be taken forward for submission. As you will be aware from our previous comments, we consider that for some of these sites there is potential for archaeological remains to be present and that further assessment should be undertaken before the decision is taken that they are suitable for development.</p>

Code	Section	Policy / Para	Representation
			<p>The sites in question are</p> <ul style="list-style-type: none"> • A15-HC Millfields LSIS • 12-EN Eleys Estate, Enfield • A05-BA Connaught Business Centre • A21-HR North East Tottenham • A24-WF Argall Avenue • LLDC3-WF Temple Mills Lane <p>We note and welcome the text at paragraph 9.38 that sets out a requirement for such an assessment for the identification of future sites. We would welcome clarification as to whether it has been undertaken for the sites above.</p> <p>With regard to the Millfields site, we would again point out that the Disinfecting Station to the west of the site has been on the Heritage at Risk register since 2010. We would suggest that this should be made explicit in the site information. Similarly, we recommend that Grade II listed buildings and Conservation Areas (and their settings) are included in the Screening Criteria in Table 10 (Sites and Areas Assessment Criteria). Failure to include these would mean that the criteria do not reflect the full range of designated heritage assets and would have implications for the successful application of Policy 3 Windfall Sites.</p>
10-2/2	9	Policy 5	<p>There are several references in the Plan to development proposals needing to demonstrate that there are no ‘significant adverse impacts on the historic environment’ (policy 5, clause f and paragraph 9.37 or ‘unacceptable harm ... to the environment’ (paragraph 5, SO4). Both of these phrases would appear to suggest that a certain (yet undefined) level of harm or impact would be allowed. However, the NPPF is clear that heritage assets are an irreplaceable resource and that all harm or loss as a result of development requires clear and convincing justification (NPPF, para 194).</p>

Code	Section	Policy / Para	Representation
			<p>The following text would set a more positive approach to develop proposals and their impacts on the historic environment and would better reflect the requirements of the NPPF:</p> <p>‘Applications for waste management facilities and related development ... will be required to demonstrate that ... they conserve and where appropriate enhance heritage assets and their settings’.</p> <p>The text at paragraphs 5 and 9.37 should also be amended accordingly.</p> <p>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.</p>

Appendix B: Proposed Modifications

Section	Proposed change	Representation code
P5f	<p>Policy 5: Assessment Criteria for waste management facilities and related development</p> <p>Applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the relevant Borough that:</p> <p>f) there is no significant adverse impact on the historic environment (heritage assets and their settings, and undesignated remains within Archaeological Priority Areas), open spaces or land in recreational use or landscape character of the area including the Lee Valley Regional Park;</p> <p><u>new) heritage assets and their settings are conserved and where appropriate enhanced;</u></p>	10-2/2
9.37	<p>The supporting documents should set out how landscape proposals can be incorporated as an integral part of the overall development of the site and how the development contributes to the quality of the wider urban environment. The applicant will need to demonstrate that there will be no significant adverse effect on areas or features of landscape, historic or nature conservation value. Where relevant, <u>applications for waste management facilities and related development will be required to demonstrate that they conserve and where appropriate enhance heritage assets and their settings, including consideration of non-designated archaeology where relevant</u> the delivery of waste facilities (through construction to operation) should take account of the need to conserve and enhance the historic environment in line with the NPPF.</p>	10-2/2

<p>Area Profiles - A05-BA Connaught Business Centre</p>	<p>Historic Environment</p>	<p>No assets identified in vicinity. <u>Within Watling Street Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u></p>		<p>10-2/2</p>
<p>Area Profiles - A15-HC Millfields LSIS</p>	<p>Historic Environment</p>	<p>There are three Grade II listed buildings adjacent to the west of site:</p> <ul style="list-style-type: none"> • Hackney Borough Disinfecting Station (<u>on Heritage at Risk Register</u>) • Shelter House • Caretakers Lodge <p>The Mandeville Primary School which is Grade II listed is situated to the south of the area.</p> <p>Historic England has commented that any development within the area located to the east and north of these assets must address their long term conservation needs in a comprehensive manner.</p> <p><u>Within Lea Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u></p>		<p>10-2/2</p>
<p>Area Profiles - A21-HR North</p>				<p>10-2/2</p>

East Tottenham	Historic Environment	No assets identified in vicinity. <u>Within the Lee Valley Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u>		
Area Profiles - A24-WF Argall Avenue	.Historic Environment	No assets identified in vicinity. <u>Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u>		10-2/2
Area Profiles - LLDC3-WF Temple Mills Lane	Historic Environment	No assets identified in vicinity. <u>Within the River Lea and Tributaries Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u>		10-2/2
Area Profiles - 12-EN Eleys Estate, Enfield				10-2/2

	Historic Environment	<p>Historic England commented that development should avoid harm to the historic environment and the setting of Chingford Mill Pumping Station (grade II) should be considered. The potential archaeology value of area should be considered along with the setting of Montagu Road Cemeteries Conservation Area.</p> <p><u>Within the Lea Valley West Bank Archaeological Priority Area. Historic England commented that there is potential for archaeological remains to be present and that further assessment should be undertaken.</u></p>		
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