



Historic England

LONDON BOROUGH OF HARINGEY LOCAL PLAN EXAMINATION

SITE ALLOCATIONS DPD

STATEMENT BY HISTORIC ENGLAND

MATTER 2: GENERAL ISSUES FOR DEVELOPMENT SITES

Hearing Session – Tuesday 30th August 2016

References:

Pre-Submission Version Site Allocations January 2016

Local Plan Strategic Policies Adopted March 2013

Urban Character Study Haringey Council February 2015

**The Historic Environment and Site Allocations in Local Plans – Historic England Advice
Note 3**

Introduction

1. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). In carrying out our role in protecting and managing the historic environment, Historic England gives advice to local planning authorities on certain categories of applications (planning and listed building consent applications), appeals and other matters affecting the historic environment.
2. Historic England is consulted on Local Development Plans under the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice .
3. Historic England's representations in relation to the Pre-submission Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development and the specific policies relevant to the historic environment.
4. This statement addresses the Inspector's questions with regards to Matters 2 "General issues for development sites". Specifically, it further clarifies Historic England's position with regards to the delivery of site allocations and the consideration of heritage issues as defined by national policy, in the London Plan and the Council's Adopted Strategic Policies.

Inspector's Question 2 – Matter 2:

How would the scale, type and distribution of the allocated sites conform to the London Plan and be consistent with the Strategic Policies (including alterations)?

5. National policy recognises the dimensions of sustainable development, these being economic, social and environmental, with local plans expected to achieve net gains in all three (NPPF para 152). Significant adverse impacts on these dimensions should be avoided, with the conservation and enhancement of the historic environment being a core principle. This approach is supported by the National Planning Policy Guidance (NPPG) when undertaking housing land availability assessment, with Stage 2 of the "Methodology" advising that consideration should be given to potential impacts upon heritage conservation.
6. In support of national policy Historic England published *The Historic Environment and Site Allocations in Local Plans – Historic England Advice Note 3* (October 2015). The *Note* provides complementary advice on how understanding the historic environment, including

the significance of heritage assets, can help achieve the successful delivery of sustainable development through Local Plan site allocations.

7. Historic England recognises the pressing need for more homes in London. The London Plan through policy 3.3, sets out the requirements for increasing housing supply and through policy 3.4, for optimising housing potential. Through the action of optimising, policy 3.4 clearly states that at strategic, local plan and planning decision levels, the local context and character of a place should be taken into account. This includes consideration of London Plan policies related to heritage management (policy 7.8 – Heritage Assets and Archaeology, and policy 7.9 Heritage-led Regeneration). Historic England supports the principle of optimising a sites potential as it aligns with the delivery of sustainable development as expressed by national policy.
8. Haringey's adopted Local Plan includes Strategic Policies SP11 Design and SP12 Conservation. Both policies are not the subject of the current Alterations to the Strategic Policies, and therefore have relevance when considering general issues for development sites. For example SP11 seeks to ensure all developments be of the highest standard of design that respects its local context and character, and historic significance, whilst SP12 seeks to ensure the conservation of the historic significance of Haringey's heritage assets and their settings. Both policies provide a sound baseline in which the scale, type and distribution of the allocated sites should be considered.
9. However as raised in our response to the proposed Alterations to the Strategic Policies, SP1 Managing Growth, suggests an increase from 8,200 to 19,802 homes albeit over an increased time period (from 2011-2026). The majority of these homes are expected to be delivered via the sites allocated in the Site Allocation DPD.
10. Our response to the pre-submission version of the Site Allocation DPD raised concerns in relation to a number of the sites allocated and the consideration of heritage assets that may be affected by their selection. This includes heritage assets both within the boundary, and setting, of sites allocated for development by the DPD. Due to the type, location and scale of many of the site allocations, a great number of heritage assets, and their significance, could be impacted. Sites raised in our response included those in Highgate (e.g. SA41, SA42 and SA44) where there is a rich mixture of heritage assets, which could potentially be impacted by future developments, unless proportionate understandings of the significance of the heritage assets are identified, understood and incorporated into the details of the site allocation requirements and development guidelines. Evidence gathered by the Council such as the *Urban Character Study* (Haringey Council - February 2015), and relevant heritage appraisal and management plans (e.g. conservation area appraisals and management plans) should be used to inform the details used to support the implementation of the site allocations.

Recommendation

11. Historic England would seek to ensure all site allocations include sufficient and proportionate details on the significance of heritage assets that may be affected by such designation. This includes details that describe the heritage asset potentially affected (both within and outside the site boundary), their significance, and how they inform the development of sites. This approach should be consistently applied, with the level of detail reflecting the heritage assets affected. Providing this essential information would ensure that the DPD is consistent with national policy and guidance, the London Plan and the Council's Strategic Policies SP11 and SP12. In particular, the provision of greater clarity on the characteristics of each site allocation up front would help ensure future proposals avoid causing unjustified harm to the significance of heritage assets (NPPF para 129), deliver the opportunity to enhance the conservation of the historic environment (NPPF para 126), and inform the delivery of quality new build that integrates with the historic environment (NPPF para 61), as well as make a positive contribution to the local character (NPPF para's 58 & 126).