



## ENGLISH HERITAGE

To: [wasteconsultation@communities.gsi.gov.uk](mailto:wasteconsultation@communities.gsi.gov.uk)

23 September 2013

**Subject:** English Heritage Consultation Response to CLG National Waste Policy for England

Dear Sir / Madam

I am writing in response to the consultation by CLG on the draft National Waste Policy for England.

English Heritage is the Government's principal adviser on all aspects of the historic environment, including historic buildings and areas, archaeology and the historic landscape with responsibilities that extend to the urban, rural and marine environments. Alongside our statutory duty to conserve the heritage, we are also required to advance its understanding and enjoyment by the public. As part of this function we manage an estate of over 400 properties open to visitors.

Our statutory duties and locus in responding to the consultation is with regard to the potential effects of the draft National Waste Policy on the historic environment. Our comments are therefore restricted to responding to **Question 4:** *'The Government considers that, with minor amendment, the locational criteria which should steer selection of the suitability of areas or sites for waste are still appropriate and comprehensive. Do you agree with the locational criteria? If not, what should be changed?'*

We agree with the general approach, but recommend that the Locational Criteria for the historic environment which are set out in Appendix B, should be re-worded from:

*'e. conserving the historic environment*

*Considerations will include any adverse effect on: (i) designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas) and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments; and (ii) the setting of these heritage assets. Potential impacts on other non-designated heritage assets identified by the local planning authority (including through local listing) will also be considerations.'*

to:

*'e: conserving and enhancing the historic environment  
Considerations will include the potential effects on the significance of heritage  
assets, whether designated or not, including any contribution made by their  
setting.'*

In our view this wording would more properly and accurately reflect the requirements as set out in Section 12 of the NPPF *'Conserving and enhancing the historic environment'*, and specifically NPPF policies 128 and 129 which set out how local planning authorities should respond to development proposals that affect heritage assets. We suggest that the current drafting is unnecessarily specific with regard to designated heritage assets, and somewhat restrictive with regard to the definition of undesignated heritage assets.

We do hope that you find these comments helpful.

Regards

Jon Humble

Inspector of Ancient Monuments (Programmes & Projects) & Senior National  
Minerals and Environmental Adviser

English Heritage | 1 Waterhouse Square

138 - 142 Holborn | London EC1N 2ST

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