STATEMENT OF COMMON GROUND 3

BETWEEN

THE BOROUGHS OF THE SOUTH LONDON WASTE PLAN

AND

ENGLISH HERITAGE

Summary:

(a) The Boroughs of the South London Waste Plan have agreed with English Heritage to propose changes to the South London Waste Plan and South London Waste Plan Sustainability Appraisal to address the concerns of English Heritage (Representation Numbers 71, 72 and SA3)

(b) The Boroughs of the South London Waste Plan have satisfied English Heritage’s concerns over the location of listed buildings in relation to Area 102 (Representation Number SA4)
This Statement of Common Ground has been prepared to identify areas of agreement between English Heritage and the Boroughs of the South London Waste Plan on matters relating to the South London Waste Plan Proposed Submission DPD and the representation by English Heritage.

**Background**

This Statement of Common Ground relates to four representations (Nos. 71, 72, SA3, SA4) made by English Heritage to the South London Waste Plan Proposed Submission DPD and its Sustainability Appraisal.

**Representation 71**

In its representation, English Heritage stated that in Section 5 of the South London Waste Plan is incomplete and inconsistent with regard the advice given to developers in the “Issues to Consider” paragraphs. In some “Issues to Consider” paragraphs which refer to sites or areas which are in Archaeological Priority Areas, developers “should pay particular attention to the evaluating and preserving any archaeological remains” while in other sites or areas which are in Archaeological Priority Areas, this requirement is omitted.

The boroughs of the South London Waste Plan agree this is inconsistent and have proposed changes (see table below) to which English Heritage has agreed.

<table>
<thead>
<tr>
<th>Proposed Minor Change No - Suggested By</th>
<th>Policy Reference</th>
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<th>Wording of Proposed Change</th>
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</thead>
<tbody>
<tr>
<td>PMC106 English Heritage</td>
<td>Page 54 Site 1</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
<td>Consistency and meet objection of a statutory body</td>
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<td>Issues to Consider</td>
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<tr>
<td>PMC108 English Heritage</td>
<td>Page 56 Site 6</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
<td>Consistency and meet objection of a statutory body</td>
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<td>Issues to Consider</td>
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<tr>
<td>PMC110 English Heritage</td>
<td>Page 58/59 Site 17</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
<td>Consistency and meet objection of a statutory body</td>
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<td>Issues to Consider</td>
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<tr>
<td>PMC114 English Heritage</td>
<td>Page 60 Site 18</td>
<td>English Heritage noted the approach to Archaeological Priority Areas</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
<td>Consistency and meet objection of a statutory body</td>
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<td>Issues to Consider</td>
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<tr>
<td>PMC119</td>
<td>English Heritage</td>
<td>Page 62/63 Site 126 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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<td>PMC125</td>
<td>English Heritage</td>
<td>Page 70 Area 99 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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<td>PMC126</td>
<td>English Heritage</td>
<td>Page 71/72 Area 102 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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<tr>
<td>PMC127</td>
<td>English Heritage</td>
<td>Page 72/73 Area 105 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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<td>PMC128</td>
<td>English Heritage</td>
<td>Page 74 Area 125 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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<td>PMC129</td>
<td>English Heritage</td>
<td>Page 77/78 Area 532/533/534/535/539/5312 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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<tr>
<td>PMC138</td>
<td>English Heritage</td>
<td>Page 82 Area 1006 Issues to Consider</td>
<td>English Heritage noted the approach to Archaeological Priority Areas was inconsistent</td>
<td>Add: “● Evaluating and preserving any archaeological remains”</td>
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</table>

**Representation 72**

In its representation, English Heritage considered Policy WP5 not consistent with national policy, due to confusion between the use of “and” and “or”. It also considered the ninth bullet point of the policy would benefit from re-wording. The ninth bullet point of this policy also received other representations and has been amended in light of those representations too.
The boroughs of the South London Waste Plan agree that the policy as drafted only protects international historic importance and should be changed. Furthermore, the boroughs of the South London Waste Plan also agree that the ninth bullet point is confusing and repetitive as drafted and should be improved for clarity reasons. The boroughs have proposed amendments (see table below) which English Heritage has agreed to.

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<tr>
<td>PMC91 English Heritage</td>
<td>Page 43 Policy WP5 Part (d) (ii)</td>
<td>English Heritage argues the policy is not consistent with national policy</td>
<td>Delete: “(ii) The site does not contain features, or will have an adverse effect on features, identified as being of international and national historic importance; and,” Replace with: “(ii) The site does not contain features, or will have an adverse effect on features, identified as being of international or national historic importance; and,”</td>
<td>Consistency with national policy</td>
</tr>
<tr>
<td>PMC92 English Heritage</td>
<td>Page 43 Policy WP5 Ninth bullet point</td>
<td>English Heritage argues the policy lacks clarity and is repetitive</td>
<td>Delete: “● do not adversely affect local conservation areas, nature conservation areas, locally important conservation areas, archaeological sites or strategic views;” Replace with: “● do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites or strategic views;”</td>
<td>Clarity and to eliminate repetition</td>
</tr>
</tbody>
</table>
Representation SA3

In its representation, English Heritage pointed out that the baseline information in the Sustainability Appraisal for the Conservation Areas and Historic Environment (Page 50 and 51) was incomplete. In particular, there was no information on:

(i) Registered Parks and Gardens of Historic Interest
- Croydon
- Kingston
- Sutton

(ii) Scheduled Monuments
- Croydon

(iii) Archaeological Priority Areas
- Kingston

The boroughs of the South London Waste Plan agree that the information is incomplete and therefore have proposed additions to Paragraphs 5.71-5.74 of the Sustainability Appraisal (Page 50/51). English Heritage has agreed to these proposed changes (see table below).

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<tr>
<td>PMC SA27 English Heritage</td>
<td>Sustainability Appraisal Page 50 Para 5.71</td>
<td>English Heritage argues the baseline information for the Sustainability Appraisal is in complete</td>
<td>Delete: “There are also 6 scheduled ancient monuments” Replace with: “There are 6 scheduled ancient monuments but no Registered Parks and Gardens of Historic Interest. In addition, there are 19 Areas of Archaeological Significance”</td>
<td>To provide a complete baseline</td>
</tr>
<tr>
<td>PMC SA28 English Heritage</td>
<td>Sustainability Appraisal Page 50/51 Para 5.72</td>
<td>English Heritage argues the baseline information for the Sustainability Appraisal is in complete</td>
<td>Before the final sentence, insert: “There is one Registered Park or Garden of Historic Interest.”</td>
<td>To provide a complete baseline</td>
</tr>
<tr>
<td>PMC SA29 English Heritage</td>
<td>Sustainability Appraisal Page 51 Para 5.74</td>
<td>English Heritage argues the baseline information for the Sustainability</td>
<td>Delete: “, around 1,000 locally listed buildings and 53 Archaeological Priority Zones.”</td>
<td>To provide a complete baseline</td>
</tr>
</tbody>
</table>
Appraisal is incomplete

Replace with:
“, around 1,000 locally listed buildings. There are 7 scheduled ancient monuments and 2 Registered Parks and Gardens of Historic Interest. In addition, there are 53 Archaeological Priority Zones.”

Representation SA4

In its representation, English Heritage requested clarification on whether Area 102 included a “show-stopping historic environment component” or listed building. There is no reference to a show-stopper of national historic importance in the South London Waste Plan Proposed Submission DPD, however, it is mentioned in the Sustainability Appraisal, Appendix 4, Table A, First Column of Page 51.

Officers of the South London Waste Plan have investigated the matter and found that there are two Listed Buildings along the section of Purley Way near to Area 102. However, they are not within Area 102. In the original technical report produced in 2008, one of the Listed Buildings (Airport House) was within Area 102. It was taken out prior to the Stage 2 Consultation (July-Sept 2009) by re-drawing the boundary of Area 102. The other Listed Building at 520 Purley Way is within Site 113, but Site 113 did not score well in the site evaluation and so the site was excluded from further consideration. It seems that the redrawn boundary of Site 102 was not identified in the Sustainability Appraisal and so the erroneous information has persisted to this stage.

The boroughs of the South London Waste Plan propose to omit the reference to a show-stopping historic environment component. English Heritage is satisfied with the boroughs response and has agreed to the proposed change (see table below).

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<tbody>
<tr>
<td>PMC SA133 English Heritage</td>
<td>Sustainability Appraisal Appendices Appendix 4 Table A Page 51 First Row Eighth Column</td>
<td>English Heritage requested clarity. The boroughs has corrected a factual error</td>
<td>Delete: “Int &amp; Nat Hist Imp”</td>
<td>To correct a factual error.</td>
</tr>
</tbody>
</table>
31 March 2011

Dear Mr Clarke

South London Waste Plan: Proposed Submission and Sustainability Appraisal

Thank you for your e-mail of today’s date and the consideration of our concerns regarding the soundness of the Proposed Submission document and Sustainability Appraisal for the South London Waste Plan.

English Heritage accepts the explanation as to the relationship of heritage assets with Site 102 and welcomes the proposed amendment of the Sustainability Appraisal to consolidate this explanation.

English Heritage requests that the references in the proposed amendments to the submission document, to “Registered Parks or Gardens of Historical Importance”, be replaced with references to “Registered Parks or Gardens of Historic Interest”, as this is the correct name of this national designation. Subject to this change, English Heritage welcomes and supports all of the proposed amendments put forward in the attachment to your e-mail of today.

English Heritage confirms that if these amendments are made to the Proposed Submission Document and Sustainability Appraisal it will resolve our concerns and we will be content with the treatment of the historic environment in the South London Waste Plan.

Yours sincerely

Claire Craig
Regional Planning Adviser (London)
E-mail: Claire.Craig@english-heritage.org.uk
Dear Duncan,

Thank you for your e-mail and the work that you and your team have done on the proposed amendments. Please see the attached letter for our formal response to these.

Yours sincerely

Claire Craig
Regional Planning Adviser (London)
English Heritage
1 Waterhouse Square
138-142 Holborn
London EC1N 2ST

DDI: 020-7973-3771
Fax: 020-7973-3792

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From: Duncan Clarke (Waste) [mailto:duncan.clarke@rbk.kingston.gov.uk]
Sent: 31 March 2011 09:53
To: CRAIG, Claire
Cc: 'Eben Van Der Westhuizen'; 'Tara Butler'; 'Day, Andy'; 'James Dean'
Subject: FW: South London Waste Plan - Response to Representations

Dear Claire,

Thank you for your representation on the South London Waste Plan. We have now investigated your concerns and proposed to make revisions to:

(i) Paragraphs 5.71-5.74 of the Sustainability Appraisal
(ii) The some of Issues to Consider sections of Chapter 5 of the main document
(iii) Appendix 4, Table B (Page 51) of the Sustainability Appraisal Appendices
(iv) Policy WP5 of the main document.

The changes are set out in the accompanying attachment.

I have also attached some maps, kindly produced by colleagues at the London Borough of Croydon, which show there are no listed buildings within Area 102.

My colleague at Croydon tells me that there are two Listed Buildings along the section of Purley Way near to Area 102. However, they are not within Area 102. In the original technical report produced in 2008, one of the Listed Buildings (Airport House) was within Area 102. It was taken out prior to the Stage 2 Consultation (July-Sept 2009) by re-drawing the boundary of Area 102. The other Listed Building at 520 Purley Way is within Site 113, but Site 113 did not score well in the site evaluation and so the site was excluded from further consideration.
It seems that the redrawn boundary of Site 102 was not identified in the Sustainability Appraisal and so the erroneous information has persisted to this stage.

I would appreciate it if you would consider the attached proposed amendments to the South London Waste Plan and, if you consider them acceptable in resolving the issues you have raised, could you let me know.

Unfortunately, we are rather pressed for time and I would be extremely grateful if you could give me your response by Tuesday, 5 April.

If you have any questions, please do not hesitate to contact me.

Regards,

Duncan

Duncan Clarke  
South London Waste Plan Project Manager  
Royal Borough of Kingston-upon-Thames  
E: duncan.clarke@rbk.kingston.gov.uk  
T: 020 8547 5375

PROPOSED AMENDMENTS TO THE SOUTH LONDON WASTE PLAN
AND ITS SUSTAINABILITY APPRAISAL

(A) Sustainability Appraisal: Paragraphs 5.71 to 7.74
(Proposed Amendments in bold)

Conservation Areas and Historic Environment

Kingston-upon-Thames
5.71 Kingston enjoys a high quality townscape and a rich heritage. There are 26 designated Conservation Areas of special architectural or historic interest, covering a total of 277 ha or 7.4% of the Borough. There are over 260 listed buildings in Kingston of which 12 are grade I and grade II*, and 3 historic buildings are identified as ‘at risk’. In addition there are approximately 700 locally designated ‘Buildings of Townscape Merit’, of which around 400 are located within Conservation Areas. There are 6 scheduled ancient monuments but no Registered Parks and Gardens of Historical Importance. In addition there are 19 Areas of Archaeological Significance.

LB Sutton
5.72 There are 14 Conservation Areas with Sutton. The Council has also identified 18 Areas of Special Local Character (ASLCs) on the basis of their high quality townscape, architecture and landscape. A further 4 areas have been recommended for designation through the LDF process. There are 2 Special Policy Areas in South Cheam, and Carshalton Beeches & South Sutton. There are 176 statutory listed buildings (Grade I, Grade II or Grade II*) and 35 locally listed buildings within the Borough. There is also one Registered Park or Garden of Historical Importance. In addition, there are 21 Archaeological Priority Areas and 6 Scheduled Ancient Monuments.

LB Merton
5.73 Much of the heritage that has been conserved within Merton is architecturally based, being protected by Conservation Areas and local listing. This is focused mainly in the historically more affluent west of the borough and is typically based on Victorian housing. The heritage value of some of the open spaces in the Borough is also recognised. There are 28 designated Conservation Areas covering 16% of the total area of the Borough. There are 3 Grade I and 231 Grade II or II* statutorily listed buildings, with a further 850 buildings on the local list. In addition, there are 20 Archaeological Priority Zones, 3 Scheduled Ancient Monuments and 4 historic parks and gardens.

LB Croydon
5.74 Croydon’s historic environment consists of 21 Conservation Areas (9 of which were designated in 2008), 43 Areas of Special Local Character (19 new designations in 2008 although will not be formally adopted until 2011 as part of the LDF process), around 150 statutory listed buildings and structures of special historic or architectural interest (Grade I, II or II*) with 6 of these on the ‘Buildings at Risk’ Register, around 1,000 locally listed buildings. There are 7 Scheduled Ancient Monuments and 2 Registered Parks and Gardens of Historical Importance. In addition, there are 53 Archaeological Priority Zones.
In the “Issues to Consider” section for the following sites or areas:

- Site 1: Factory Lane Transfer Station, Croydon
- Site 6: Villiers Road HWRC, Kingston
- Site 17: Country Waste Recycling Ltd, Sutton
- Site 18: Viridor recycling and Composting Centre, Sutton
- Site 126: Benedict Wharf Transfer Station, Merton
- Area 99: Purley Oaks Highways Depot, Croydon
- Area 102: Purley Way, Lysander Road and Imperial Way Industrial Area, Croydon
- Area 105: Factory Lane Industrial Estate, Croydon
- Area 125: Factory Lane Industrial Estate (South Side), Croydon
- Area 532/533/534/535/539/5312: Beddington Industrial Area, Sutton
- Area 1006: Wandle Valley Trading Estate, Sutton,

it is proposed to add:

- “Evaluating and preserving any archaeological remains”

(C) **Sustainability Appraisal: Appendix 4, Table B, Page 51**

It is proposed to remove “Int & Nat Hist Imp” from the Showstoppers column relating to the Site 102 row.

(D) **Proposed Submission Document: Policy WP5**

It is proposed to re-word the following sections of Policy WP5 in response to English Heritage’s representations and other representations (amendments in bold):

“(d) (ii) The site does not contain features, or will have an adverse effect on features, identified as being of international or national historic importance;”

Ninth bullet point:

- “do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites or strategic views;”
CURRENT SOUTHERN BOUNDARY OF AREA 102 AND LOCATION OF LISTED BUILDING
Parcel Address: Purley Way South, Croydon, CR0