

**Respondent number: 621**



**Examination of the London Plan**  
**Matter 70: Aggregates**  
**Historic England, Hearing Statement 10**  
**25 February 2019**

Historic England is the principal Government adviser on the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are reflected in local planning policy and practice.

As a spatial development strategy, the legal duty relating to soundness set out in section 20(5)(b) of the Planning and Compulsory Purchase Act 2004 does not apply to the London Plan. However to ensure consistency with national policy the tests of soundness to be applied require that London Plan should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft London 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.

# Historic England Hearing Statement

## Introduction

- 1.1 This statement addresses the Inspectors' questions with regards to Matter 70: Aggregates (policy SI10) which will be discussed in week 9 of the Hearings Programme (Wednesday 1<sup>st</sup> May 2019). The Statement has been prepared with reference to the Minor Suggested Changes to the draft London Plan (published 13<sup>th</sup> August 2018).
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the London Plan.

Representations dated 1<sup>st</sup> March 2018

<https://www.london.gov.uk/sites/default/files/Historic%20England%20%28621%29.pdf>

Our representations on archaeology are based upon and referred to a joint archaeology sector paper: "Full Review of the London Plan: Archaeology Topic Paper Delivering Better, Faster & Focused Public Benefits" dated March 2017

<https://historicengland.org.uk/content/docs/get-involved/london-plan-archaeology-topic-paper-delivering-public-benefits-pdf/>

## Inspectors Questions: Aggregates

**Matter 70. Would Policy SI10 provide a justified and effective strategic framework for the steady and adequate supply of aggregates to support construction in London? In particular:**

**d) Would Policy SI10 adequately address the full range of environmental and other impacts of aggregate facilities?**

**e) Would it provide appropriate, justified and effective guidance on development management matters?**

- 2.1 Historic England has drawn attention to the high archaeological impact of mineral extraction in our representations and requested that Part D of Policy SI10 be amended to refer to the need for archaeological assessment and mitigation. Unfortunately no changes are proposed in this respect so to remedy this omission we request the addition of a further clause to Part D to say (additional text in red):

To reduce the environmental impact of aggregates facilities, Development Plans should: *3) ensure that archaeological assessment and field evaluation is required to inform planning decisions for mineral extraction and that conditions are imposed to ensure appropriate mitigation of impacts, including where necessary excluding important heritage assets from extraction.*

We also wish to improve Part D clause 1 by addition of a reference to the setting of heritage assets providing an opportunity to secure positive benefits: 1) ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction, with particular emphasis on promoting green infrastructure, especially biodiversity *and enhancing the setting of heritage assets.*

2.2 Historic England accepts that a steady, adequate and sustainable supply of minerals is essential to the nation's prosperity, infrastructure and quality of life. However, the scale of modern quarrying means that it can have a major destructive impact on archaeological remains and can harm the significance of nearby heritage assets. Historically, mineral workings have made extensive harmful impacts on the historic environment but the modern industry has engaged positively with archaeological concerns. To demonstrate this, the Minerals and Historic Environment Forum has published a [Minerals Extraction and Archaeology Practice Guide](#) for dealing with archaeological remains as part of mineral development process as an aid to planning authorities, mineral planners, mineral operators, archaeologists and consultants. In recent decades well managed archaeological involvement on mineral extraction sites has made a fundamental contribution to our understanding of the past.

NB: The Mineral Extraction and Archaeology Practice Guide is currently being updated for consistency with the NPPF but the principles are still relevant.

2.3 Mineral extraction in the London Plan is restricted to sand and gravel in north west and north east London. Both areas are archaeologically rich having been favoured for human settlement and food production from prehistory to the present day. In addition the gravels themselves, and even more so some of the silts that overlie them, contain some of the most significant Palaeolithic (Old Stone Age) archaeology in England. These areas have a long history of mineral extraction which has cumulatively caused extensive harm to these archaeological landscapes. In recent decades a few particularly important sites have been excluded from extraction and in other cases loss has been mitigated by investigations. Discoveries on London mineral sites include prehistoric burial and ritual monuments, Bronze Age metal hoards, Iron Age and Romano-British farmsteads, Anglo-Saxon cemeteries and widespread field systems of most periods.

2.4 The potential impacts of mineral extraction on the historic environment include:

- Destruction of archaeological remains within the footprint of extraction.
- Changes to local hydrology causing deterioration of nearby waterlogged archaeological remains.
- Noise, dust and the vibration caused by the regular passage of HGVs have the potential to damage the fabric of historic buildings, monuments and areas, and can also diminish our opportunities to enjoy and appreciate them.
- Inappropriate restoration of former extraction sites can disfigure the historic character of the landscape and compromise the setting of heritage assets.

The most common irreversible impact on the historic environment within an area potential development area is on archaeological remains. The most common off-site impacts are on the significance of an asset in terms of its setting.

- 2.5 To ensure that the relevant authorities can make properly informed planning decisions, it is essential that all potential impacts and their cumulative effects are suitably assessed as part of the decision-making process. The Minerals Extraction and Archaeology Practice Guide provides guidance on a range of evaluation techniques (both intrusive and non-intrusive) that need to be used in some combination to achieve an appropriate level of understanding. Archaeology will normally need to be scoped into consideration for Environmental Assessment on minerals sites. Pre-application consultation with Historic England's Greater London Archaeological Advisory Service is essential to ensure assessment meets appropriate standards.
- 2.6 Mitigation measures could involve excluding sensitive areas from extraction, measures to monitor and prevent dewatering of archaeological remains, considerate temporary landscaping, routing vehicles away from historic places and restoration plans which take full account of local historic landscape character and the setting of nearby heritage assets. For significant archaeological remains which are not preserved in-situ archaeological investigation will be necessary prior to mineral extraction. Given the extent of archaeological remains on London's sand, silt and gravels these investigations can be extensive and carried out in phases in advance of extraction.
- 2.7 NPPF 2012 paragraph 143 says that Local Plans should:

*“set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment ...; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;”*

Policy SI10 as currently worded gives no indication that the historic environment is an issue that needs particular consideration for mineral extraction or how impacts should be assessed and addressed. SI10 is therefore not consistent with national planning policy.

## **Conclusion**

- 3.1 In summary Historic England remains concerned that policy SI10 as worded does not adequately address a significant environmental impact of mineral extraction or provide appropriate, justified and effective guidance on development management matters in this respect.
- 3.2 To remedy this omission we request the addition of a further clause to Part D to say:

To reduce the environmental impact of aggregates facilities, Development Plans should:

*3) ensure that archaeological assessment and field evaluation is required to inform planning decisions for mineral extraction and that conditions are imposed to ensure appropriate mitigation of impacts, including where necessary excluding important heritage assets from extraction.*

3.3 We also wish to improve Part D clause 1 by addition of a reference to the setting of heritage assets providing an opportunity to secure positive benefits:

1) ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction, with particular emphasis on promoting green infrastructure, especially biodiversity *and enhancing the setting of heritage assets.*