



National Waste Management Plan for England: Consultation Response from Historic England

15 October 2020

1. Introduction

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 sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood enjoyed and cared for.

2. Summary of Historic England's key points

2.1 We welcome and appreciate the steps that have been taken to address our consultation response to the Scoping Report for the Strategic Environmental Assessment (SEA) of the draft Waste Management Plan for England in July 2019.

2.2 In the draft Historic England Advice Note on commercial renewable energy development we [published for consultation](#) earlier this year we highlighted in particular the following impacts on the historic environment from energy from waste proposals:

- Impacts on-site
- Visual impacts
- Transport impacts

2.3 We welcome the statement (on page 33 of the Environmental Report) that "*The construction and operation of infrastructure (including waste management infrastructure) could have adverse impacts on the significance of heritage assets directly through the loss of, or damage to, assets and their setting, depending on scale and location of works.*"

2.4 Whilst paragraph D11.4.1 in Appendix D begins by stating that "*The settings of some heritage assets are at risk from new development*" the Environmental Report does not carry this through to its recommendations and, as a result, we believe that the findings under-represent the potential impact of waste infrastructure on the setting of heritage assets. For example, setting is not explicitly mentioned in the mitigation measures associated with cultural heritage in Table 4.2 of the main report (drawn from D11.8).

One could argue that it is implied in the reference that “*Any new infrastructure proposed should be considered against the policies and requirements of the relevant waste local plan, or National Policy Statement (if applicable)*”; however, clearer links between the identified problems and mitigation measures would be welcome and appropriate in this case.

2.5 This point is reflected also in Appendix D where paragraph D11.6.1 notes that “*The potential impacts of waste infrastructure on such sites will include dust, noise, climatic emissions and vehicle movements (including vibrations)*.” This does not mention impacts on archaeology or impacts on setting. Whilst both issues are considered in more detail at the site specific stage linked with relevant planning policy, we note that archaeology is mentioned in the mitigation measures of this assessment but setting is not.

2.6. The need for a stack for flue-gas treatment and the overall size and massing of EfW facilities present significant challenges in sensitive locations, noting that such facilities can cause considerable harm to the significance of designated heritage assets. Effective visualisations of the proposed development are needed to allow the impact of a proposal to be assessed. Although the harmful impact of such a facility will often be due essentially to its siting and scale in relation to the designated heritage asset(s) affected, in some cases good design may mitigate such an impact. Fundamental to achieving high quality design will be a sound understanding of the significance of any heritage assets affected, whether at the scale of individual buildings and sites or more extensive historic areas and landscapes.

2.7. Finally, it is currently unclear how waste management development would fit into the three area system proposed in the [Planning White Paper](#) (growth, renewal and protected) and how the White Paper’s proposals would impact on waste plan-making. Waste facilities have the potential to have significant impacts on the historic environment. It is essential that robust mechanisms are in place for assessing those impacts and protecting the historic environment.

We hope that these comments are helpful. Please do contact us if you have any queries or require further information.

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