

Strategic Environmental Assessment (SEA) Screening Opinion
for
Conservation Area Appraisal and Management Plans for Bruce
Castle, Tottenham Cemetery, Tower Gardens and Peabody
Cottages

Prepared by:

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For consultation with:

Historic England, Environment Agency and Natural England

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1. Introduction

- 1.1. A Conservation Area Appraisal Management Plan (CAAMP) may require a Strategic Environmental Assessment (SEA) to comply with European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”. The European Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2. Under Article 3(3) and 3(4) of the SEA Directive, SEA is required for plans and programmes which “determine the use of small areas at a local level” or which only propose “minor modifications to plans” to plans and programmes, and which would otherwise require SEA, only where they are determined to be likely to have significant environmental effects.
- 1.3. National Planning Practice Guidance (NPPG) provides guidance on SEA/SA for Supplementary Planning Documents (SPDs) but not for other documents such as CAAMPs. It advises that SPDs do not require SA where potential affects “already have been assessed during the preparation of the Local Plan”. It advises that “SEA is unlikely to be required where a SPD deals only with a small area at a local level... unless it is considered that there are likely to be significant environmental effects”. Further “Before deciding whether significant environmental effects are likely, the local planning authority should take into account the criteria specified in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies”. The criteria in Schedule 1 are set out in section 3 of this report.
- 1.4. The CAAMPs will be capable of being a material consideration in the assessment of future planning applications within the relevant Conservation Areas. It is the Council’s responsibility to identify whether an SEA should be undertaken.
- 1.5. The screening process is based upon consideration of standard criteria of Annex II of the Directive to determine whether the plans are likely to have “significant environmental effects”. The result of the local planning authority’s screening process is detailed in this screening statement.
- 1.6. The CAAMPs have been screened to consider whether a SEA is required. Should guidance within the documents change, the screening opinion of the borough could also change.
- 1.7. The screening determination also includes the views of the statutory consultation bodies Historic England, Natural England and the Environment Agency. Their correspondence can be found within the report Appendix.
- 1.8. This screening determination has been undertaken by the London Borough of Haringey. The borough has determined that the plans are unlikely to have significant environmental effects. A SEA therefore should not be undertaken.

2. Purpose of Conservation Area Appraisal Management Plans

- 2.1. CAAMPs do not introduce new policy but have the status of evidence base documents. Their purpose is to support existing planning policy already set out in the adopted Local Plan.
- 2.2. The National Planning Policy Framework (NPPF) issued by the Government in February 2019 requires local planning authorities to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Pursuant to this requirement, Conservation Area appraisals define the special character of Conservation Areas and set out positive strategies for their future management and enjoyment.
- 2.3. Haringey's Local Plan policies relating to management of the historic environment are SP12 in Haringey's Strategic Policies (2017), which sets out the Council's intention to ensure the conservation of the significance of Haringey's heritage assets, and supports the use of the historic environment as a basis for heritage-led regeneration, good design and positive change, and DM9 Management of the Historic Environment, in Haringey's Development Management DPD (2017), which sets out the Council's approach to managing development affecting heritage assets in more detail, and requires that the Council has regard to character appraisals and management plans when considering the impact of proposed development on the historic environment. The Local Plan documents were the subject of Sustainability Appraisals incorporating the requirements of SEA.
- 2.4. An adopted character appraisal therefore provides a sound basis for implementing the Council's approved development plan policies relating to Conservation Areas and will support development management decisions. The appraisals are for use by local residents, community groups, businesses, property owners, architects and developers. The Council will use the documents in the assessment of relevant development proposals, and the Planning Inspectorate will take them into account when it considers and determines planning appeals.
- 2.5. The Conservation Area Appraisals and Management Plans have been written to reflect the framework set out in *Historic England, Historic Environment Advice Note 1: Conservation Area Appraisal, Designation and Management (Second Edition) (2019)* as well as other relevant guidance. A brief structure of the documents is set out below:

Appraisal

- **The summary of special interest:** a succinct description of the overall character of the Conservation Area.
- **Comprehensive appraisal:** recording the special character of the area covering; location and setting, historical development and archaeology, architectural quality, public realm, and condition and development pressure.

- **Audit:** A record of all buildings in the area, indicating whether they make a positive, negative or neutral contribution.

Management Plan

- **Principles for development management:** Setting out the Council’s approach to managing new development, including when planning permission is required, expectations for applications, and relevant policies.
- **Boundary Review:** In some cases there are proposals for minor changes to the Conservation Area boundary

Preserving and Enhancing the Conservation Area

- A set of accessible illustrated Design Guidelines detailing how the special character should be preserved or enhanced covering; shop front design, making changes to listed buildings, extensions, external maintenance and facade restoration, and window and door replacements.

3. Assessment

- 3.1. The “responsible authority” must determine whether the plan or programme, in this case the Conservation Area Appraisal and Management Plans for Bruce Castle, Tottenham Cemetery, Tower Gardens and Peabody Cottages, are likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the Regulations.
- 3.2. These criteria are set out in the table below, along with consideration of the likely impact of the CAAMPs against each.

SEA Directive criteria	Comments	Likely Significant Effects?
Characteristics of plans and programmes, having regard, in particular to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The CAAMPs only act as guidance to help preserve and enhance the historic character of the area. The appraisals identify enhancement opportunities; however these are just opportunities and there is no set programme to take these forward. The appraisal aims to preserve the historic character of the area, therefore ensuring that development will not occur that will adversely affect the special historic nature. This will have the effect of limiting the amount and type of development that will occur in the area, however this is primarily achieved through the use of Local Plan policies to which these CAAMPs give further guidance, and which have been the subject of SA.	No
1b) The	The CAAMPs are supplementary to the relevant	No

<p>degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>Local Plan policies as guidance. With regard to these policies, the CAAMPs will only act to protect and enhance the areas of value for heritage of a small part of the Borough. It is considered the extent of impact is unlikely to be significant in this regard.</p>	
<p>1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</p>	<p>The CAAMPs are planned to have a positive impact on local environmental assets, particularly the preservation and enhancement of Bruce Castle Park and Tottenham Cemetery, which are designated Metropolitan Open Land.</p> <p>The CAAMPs will give guidance to ensure the retention of historic buildings and that the historic character of buildings are preserved and enhanced. This, in turn, may prompt support for local suppliers and craftsman. The retention /repair of buildings and reuse of building materials reduces pollution associated with new development and reduces waste. However, any effect will occur only at local level and will not have significant environmental effects</p>	<p>No</p>
<p>1d) Environmental problems relevant to the plan or programme</p>	<p>The Council believes that there will no significant environmental problems resulting from the appraisals. The CAAMPs apply to relatively small, localised areas that are already well developed. The plan will seek to protect the current historic and natural environment of the area as they will limit development that could be harmful to these assets to a degree. The CAAMPs will identify possible opportunities for enhancement.</p> <p>The CAAMPs are supplementary to Local Plan policies for which wider environmental problems have already been appraised.</p>	<p>No</p>
<p>1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management</p>	<p>The CAAMPs are not directly relevant to the implementation of community legislation on the environment.</p>	<p>No</p>

or water protection).		
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects	<p>The CAAMPs cover a small area of Tottenham in the London Borough of Haringey, which is already well developed. Localised impacts of developments on the townscape are intended to be beneficial, but if not then should be of a relatively small scale and thus reversible in the short to medium term.</p> <p>The CAAMPs are supplementary to Local Plan policies for which wider significance of effects have already been appraised.</p>	No
2b) The cumulative nature of the effects	<p>The CAAMPs will not result in major changes or actions in the area affected. Therefore, there will be no significant cumulative effects. The plan seeks to enhance and protect the historic character and nature of the area.</p> <p>The CAAMPs are supplementary to Local Plan policies for which cumulative effects have already been appraised.</p>	No
2c) The trans-boundary nature of the effects	<p>There are no trans-boundary effects arising from the CAAMPs.</p> <p>The CAAMPs are supplementary to Local Plan policies for which trans-boundary effects have already been appraised.</p>	No
2d) The risks to human health or the environment (e.g. due to accidents)	<p>There are unlikely to be risks to human health or the environment arising from the CAAMPs in respect of this criterion.</p> <p>The CAAMPs are supplementary to Local Plan policies for which wider human health and environment risks have already been appraised.</p>	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	<p>The CAAMPs cover a small area of Tottenham in London borough of Haringey. The effects described within criterion 1c will apply to an area with a population of approximately 2,000). Both the size of the area and population are not considered significant.</p> <p>The CAAMPs are supplementary to Local Plan policies for which wider spatial effects have already been appraised.</p>	No
2f) The value and vulnerability of the area likely to be affected due to:	<p>The CAAMPs will help ensure positive effects on cultural heritage, but these will only be in a localised area and will not be significant. As the CAAMPs will not lead to any major development (and may in fact restrict development and building in the area) it is unlikely that there will be any effects on European</p>	No

<p>i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use</p>	<p>Protected Species or green space. The appraisal seeks to control development to ensure protection of the character of the area. The CAAMPs will have positive or neutral effects on environmental quality standards. This is because they will seek to limit development and promote the use of building techniques that are compatible with the historic environment. However, any actions or works that take place are likely to be at a very small level and will not affect environmental quality standards. The plan applies to an area which is already developed. The CAAMPs do not include any site allocations for development and will not lead to intensive land use.</p> <p>The CAAMPs are supplementary to Local Plan policies for which natural characteristics, cultural heritage and environmental quality standards have already been appraised.</p>	
<p>2g) The effects on areas or landscapes which have a recognised national, Community or international protection status</p>	<p>There are no landscapes of national or international protection status in the Area.</p> <p>There are two landscapes of recognised Metropolitan importance in the areas and which the CAAMPs may have an impact on. These are Tottenham Cemetery and Bruce Castle Park, which are designated Metropolitan Open Land.</p> <p>However, as the CAAMPs are guidance for preserving and enhancing these protected assets, there will be no significant environmental effects upon them.</p> <p>The CAAMPs are supplementary to Local Plan policies for which wider protections have already been appraised.</p>	<p>No</p>

4. Screening outcome

4.1. Having reviewed the CAAMPs against the above criteria, it is concluded that they are not likely to have significant environmental effects and accordingly, should not be subject to Strategic Environmental Assessment.

5. Next steps

5.1. This determination has also been subject to consultation with the statutory consultation bodies. The consultation bodies specified in the Environmental Assessment of Plans and Programmes Regulations 2004 that were consulted on this screening determination are:

- Historic England;
- Environment Agency; and

- Natural England

5.2. Responses from the consultation from Natural England and Historic England are set out below.

Natural England

No response received

Historic England

No comment

Environment Agency

No comment