



Historic England

Department of Energy and Climate Change ‘Technical Consultation - Scope of the Appraisal of Sustainability of the draft National Policy Statement for Geological Disposal of Radioactive Waste’ Sept 2015

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 established under the National Heritage Act 1983 and sponsored by the Department for 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.

The majority of the comments below relate to those parts of the Appraisal of Sustainability which address the historic environment.

Q1 – Do you agree with the main issues identified in topic areas?

We note that ‘Cultural Heritage’ is identified as an AoS topic being described as ‘Consideration will need to be given to the potential effects on the historic environment, including cultural heritage resources, historic buildings and archaeological features’. We recommend this should be further strengthened by also making a specific reference to the potential effect on their setting as set out in the Government’s ‘National Planning Policy Framework’ (DCLG 2012). Similarly, the importance of setting should be included under the ‘Landscape and Townscape’ topic which is described as ‘Consideration will need to be given to the potential effects on the quality and attractiveness of landscapes and townscapes, as well as on visual amenity and public access to open spaces’.

Q2 - Do you think the AoS Scoping Report sets out sufficient information to establish the context for the appraisal? If not, which areas do you think have been missed and where is information on these topics available from?

It is not clear how the AoS links have been identified. For example, the topics/objectives relating to flood risk and coastal change, noise, climatic factors, and traffic and transport are also likely to be of relevance to both cultural heritage, and landscapes and townscapes. This could be further considered under the appropriate headings in Appendix B ‘Baseline and Contextual Information’ where our guidance on ‘Climate Change and the Historic Environment’ is referenced.

Similarly in Appendix B ‘Cultural Heritage’, the recently published Historic England Good Practice Advice Notes on ‘Managing Significance in Decision-Taking in the Historic Environment’ (<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>) and ‘The Setting of Heritage Assets’



Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH
Telephone 01793 44 5050 Facsimile 01793 41 4707
HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

(<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>) could be usefully included in the paragraph which describes a number of our other guidance documents. Although the 'National Planning Policy Framework' is considered under 'Landscape and Townscape', the 'National Planning Policy Guidance' has been omitted together with registered battlefields when considering registered landscapes in England.

Q3 – Do you agree that the AoS objectives and guide questions cover the breadth of issues appropriate for appraising the effects on the draft NPS? If not, which objectives should be amended and which other objectives do you feel should be included?

Under 'Cultural Heritage' (Section 12) and as mentioned in Q1 above the first two parts of the 'Objective/Guide Question' should also make specific reference to setting which has been identified in the final section. We also suggest combining the second and third rows under 'Reasoning' so the content reflects all aspects of the historic environment. The 'Illustrative Guidance for the Assessment of Significance for Cultural Heritage' requires careful review – 'Positive' should include locally important cultural heritage features, 'Neutral' should mention setting and 'Negative' should include locally important cultural heritage features.

Under 'Landscape and Townscape' (Section 13) the third and fourth row of the 'Objective/Guide Question' should again reference setting when considering protected/designated landscapes and landscapes/townscapes. The 'Illustrative Guidance for the Assessment of Significance for Cultural Heritage' requires careful review – 'Significant Positive' bullet one include setting, bullet two only refers setting and not direct impacts, 'Positive' bullet one include setting, bullet two only refers to setting and not direct impacts, 'Neutral' could state the option would not have any effect on statutorily-designated landscapes, local landscapes, townscapes and their setting, 'Negative' bullet one and two include setting and 'Significant Negative' bullet one and two include setting.

Shane Gould

Senior Local Government & National Infrastructure Adviser

Historic England
Government Advice Team
1 Waterhouse Square
138-142 Holborn
London EC1N 2ST

Email: shane.gould@HistoricEngland.org.uk



Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH
Telephone 01793 44 5050 Facsimile 01793 41 4707
HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

If you require an alternative accessible version of this document (for instance in audio, Braille or large print) please contact our Customer Services Department:

Telephone: 0370 333 0607

Fax: 01793 414926

Textphone: 0800 015 0516

E-mail: customers@HistoricEngland.org.uk