



Historic England

## Department for Transport

### ***Proposals for the Creation of a Major Road Network Consultation (December 2017)***

#### **Historic England Response**

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 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.

A number of the consultation questions lie outside the scope and expertise of Historic England and we have therefore concentrated on those that fall within our remit.

#### **Consultation Questions**

1. *Do you agree with the proposed core principles for the MRN outlined in this document?*

The core principles aim to deliver the Government's five central policy objectives in creating a Major Road Network (MRN). However, we propose the addition of a further objective; that the MRN should seek to conserve and enhance the environment, which is then developed in the core principles. Although this is touched on under the heading of reducing congestion (page 15), the creation of a MRN and its associated works may have other environmental impacts not associated with congestion that require consideration – see below.

This proposed policy objective is in accordance with the Government's *National Planning Policy Framework* (Department for Communities and Local Government, 2012), which recognises the importance of environmental matters (notably as one of the three strands of sustainable development), as does the *National Policy Statement for National Networks* (Department for Transport, 2014). It is also in line with the Department for Transport's *Shaping the Future of England's Strategic Roads: Consultation on Highways England's Initial Report* (2018), where the aspiration is to run a network that works

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harmoniously with its surroundings to deliver an overall positive impact on the environment.

With specific reference to the historic environment, much of England's road network is of historic interest, with many of the routes being established by the Turnpike Trusts or created during the Roman period. In addition, the network impacts either directly or indirectly (and sometimes in a very negative manner) on sensitive landscapes, historic buildings and archaeological sites. Some of these heritage assets will be protected as World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas, whereas as many others are of considerable local interest. Future proposals within the MRN could seek to address existing problems or result in further environmental damage, if not properly considered.

4. *Have both the quantitative and qualitative criteria proposed in the consultation document identified all sections of road you feel should be included in the MRN?*
5. *Have the quantitative or qualitative criteria proposed in the consultation identified sections of road you feel should not be included in the MRN?*

In the absence of further information on what specific works are planned on the identified sections of road shown on the indicative map of the proposed MRN, it is difficult to respond to Questions 4 and 5. Given the environmental sensitivity of some parts of the network, the suggested interventions could prove highly damaging and it is important not to adopt a one-size-fits-all approach based purely on an engineering solution.

Early and on-going engagement with the Statutory Environmental Bodies and local authority specialist environmental staff will be important in taking account of environmental issues, avoiding negative impacts and identifying possible enhancement opportunities. Indeed, in the absence of the Regional Evidence Bases, it might not be appropriate to map MRN routes at this stage without the flexibility to then re-examine their suitability at a regional and local level. These issues are further explored in our responses to Questions 10, 14 and 16 below.

10. *Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence Bases?*

As the Investment Programme for the MRN will be based on the Regional Evidence Bases, it needs to take account of environmental considerations. This is especially important in undertaking the analysis of potential region-wide solutions and the development of scheme proposals.

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The Department's guidance to regions on the development of Regional Evidence Bases must therefore include a consideration of environmental issues (natural, built and historic), and clearly specify the need for early and meaningful engagement with the Statutory Environmental Bodies and local authority specialist environmental staff. Early engagement helps to de-risk potential projects, avoid unnecessary delay and maximise enhancement opportunities, especially when it is undertaken at an early stage in the design process.

For the historic environment, we would expect this to include Historic England, and local authority archaeological and conservation officers, together with a consideration of the *National Heritage List for England* and the relevant local authority Historic Environment Record.

*14. Do you agree with the investment assessment criteria outlined?*

Whilst we welcome the inclusion of cultural heritage sites alongside other categories under the environmental impacts criteria, we do not agree that these relate exclusively to the 'reducing congestion' objective for the reasons given in Question 1 above. In order to align with current Government policy and the Department for Transport's aspiration 'to run a network that works harmoniously with its surroundings to deliver an overall positive impact on the environment' (*Shaping the Future of England's Strategic Roads: Consultation on Highways England's Initial Report (2018)*), the need to conserve and enhance the environment should be identified as a separate policy objective.

All types of scheme eligible for MRN funding could have negative environmental impacts unless they are carefully planned and considered from the outset including: bypasses, major renewal work, major junction improvements, use of technology and the widening of existing MRN roads. Such proposals could have direct and indirect impacts on individual sites and the wider historic environment, as well as consequences for the significance and experience of historic places and heritage assets in the vicinity of routes, resulting from possible severance caused to local roads and historic places, for example.

*16. Is there anything further you would like added to the MRN proposals?*

In developing schemes for the proposed MRN, care will need to be taken to avoid a 'one-size-fits-all' solution based purely on engineering requirements. Bypasses, road widening, junction improvements and the installation of new technology are all likely to have environmental impacts, and in order to avoid harm, each scheme will need to be tailored to the character and circumstances of each local area.

All impacts on the historic environment will need to be carefully assessed using appropriate expertise/techniques and avoid harm wherever possible,

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whilst looking for enhancement opportunities, including conservation and repair. The use of Highways England's recently produced principles of good road design may be a useful resource, together with the meaningful involvement of the Statutory Environmental Bodies, local authorities (including specialist staff with environmental expertise), and those communities who are likely to be affected. Highways England's good practice guidance on *Consulting the Statutory Bodies on Proposed Highways England Major Projects*, may serve as a useful model on how to engage with the Statutory Environmental Bodies on emerging MRN projects.

Future schemes must take account of the Government's *National Planning Policy Framework*, the *National Policy Statement for National Networks* (where appropriate), and it is assumed will also be guided by the *Design Manual for Roads and Bridges*. However, this document is now rather dated and, for the historic environment, does not reflect current Government policy. Highways England intends to undertake a major review of the *DMRB* during the current period and, as the Government's statutory adviser on all matters relating to the historic environment in England, we have offered to help them with this work.

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