

Response ID ANON-577H-6JKD-T

Submitted to **Consultation on developing a National Policy Statement for Water Resources and proposals to amend the definition of nationally significant water infrastructure in the Planning Act 2008**

Submitted on 2017-12-22 12:37:28

Part 1: Development of the National Policy Statement

1 Do you have any views or further evidence that could inform the need for resilience in the water sector?

Please provide further comments :

N/A

Part 2: Approach to the development of the National Policy Statement.

2 Do you have any views or comments on these principles for developing the NPS?

Please answer the above question :

Historic England welcomes Principle 3 ('The NPS will reiterate the importance of developing and designing water resources schemes that meet the government's objective to enhance the environment'). To better reflect national policy as set out in the National Planning Policy Framework (NPPF), however, the following amendment is suggested: '... conserving and enhancing the environment (including both the natural and historic environment)'. The ambition to include the need to establish net environmental benefit in the design of water resources infrastructure is to be lauded, but heritage assets are irreplaceable, and the first principle with regard to the historic environment should therefore be to avoid and then mitigate harm to its significance. Only once harm has been minimised is it possible to look at measures which seek to reveal and better enhance the historic environment. In order to fully meet the requirements of Principle 3, reference should also be made to the NPPF and accompanying Planning Practice Guidance.

3 Do you consider there to be any further principles for developing the NPS? Please explain your reasoning

Please answer the above question :

N/A

Part 2 cont ... Appraisal of Sustainability and Habitats Regulations Assessment

4 Do you agree with the main issues identified in the topic areas (Section 3.3 of AoS Scoping Report)? Specifically: Are there issues included in the proposed scope of the appraisal that you think should be removed? If so why? Are there relevant issues that have not been reflected in the proposed scope of the appraisal that you think should be included? If so, why?

Please provide your answer:

Historic England's comments on Appendix B 'Detailed Appraisal including Baseline and Contextual Information' are set out in the response to Q5 below.

In the summary of key issues (cultural heritage), reference could also usefully be made to the potential risks of changes in water abstraction (as noted in paragraph 34 of the main consultation document) for the wider historic environment (i.e. not just wetlands). Such changes could result in disruption to important water sources (e.g the thermal springs in Bath), the flooding or drying of deep archaeological sites (e.g. mines), and general changes to local water levels (affecting mills, bridges, etc.).

Specific mention should be made of the historical importance of some reservoirs, pumping stations and associated facilities (some of which may be designated).

Registered Battlefields and Designated Wrecks should be added to the list of heritage assets.

Under Landscape and Townscape, noise should be added under the final bullet point in Key Trends with both noise and light pollution impacting on tranquillity.

5 Does the AoS Scoping Report set out sufficient information to establish the context for the appraisal, both in terms of the scope of the baseline analysis presented, and the plans and programmes reviewed (AoS appendix B)? If not, which areas do you think have been missed from the baseline analysis and/or what additional plans or programmes should be included?

Please answer the question:

The definition of cultural heritage could usefully be more closely aligned with the definition of the historic environment in the NPPF.

The 1990 Act would be more accurately described as follows: 'The Planning (Listed Buildings and Conservation Areas) Act 1990 outlines the level of protection received by listed buildings and conservation areas'.

Reference should also be made to the legislation which authorises Historic England to prepare the parks and gardens and battlefields registers (the Historic Buildings and Ancient Monuments Act 1953).

The reference to the National Planning Policy Statement should be corrected to 'National Planning Policy Framework'. The subsequent references to heritage policy are not complete; it may be most efficient to refer to the whole conservation section.

The reference to the Planning Practice Guidance is not particularly clear, and would benefit from revision (Historic England would be happy to advise further on this).

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Appraisal should be added to the list of Historic England advice; it is worth noting that GPA3 is about to be reissued.

Reference also needs to be made to non-designated heritage assets. These are defined in the NPPF, and subject to specific policy (and Historic England advice). Particularly important within non-designated assets is nationally important, but non-designated archaeology (which is treated in the same way as scheduled monuments in policy terms).

In 13.3, up to date figures on designated assets can be obtained from the National Heritage List for England. The most up to date Heritage at Risk Register is the 2017 edition, not 2016. Reference should be made to Historic Environment Records as valuable sources of information.

See comments in response to Q4 regarding the issues and trends discussed in 13.4.

All of the above should then be reflected in the guide questions in Table 13.1.

There are some (repeated) errors in Section 14:

- In England, parks and gardens are not registered for their landscape value but for their historic interest
- the register of parks and gardens is in fact a statutory designation (see reference to the 1953 Act, above).

All matters pertaining to historic parks and gardens should be considered under cultural heritage.

6 Do the AoS objectives and guide questions (Section 4.3 of AoS scoping report) cover the breadth of issues appropriate for appraising the effects of the draft NPS? If not, which objectives should be amended and how? Or which guide questions should be amended and how? Are there other objectives or guide questions that you believe should be included?

Please answer the question:

Cultural Heritage

It may be helpful for this NPS to be more closely aligned with other recent and emerging NPSs, particularly with regard to the criteria/questions being used. For example, this is the parallel wording currently used in the Airports NPS (supplemented with Historic England's suggestions for its improvement):

"Historic Environment

Objective: Conserve and where appropriate enhance heritage assets and the wider historic environment including buildings, structures, landscapes, townscapes and archaeological remains

Guide Questions:

Will it affect the significance of internationally and nationally designated heritage assets and their settings?

Will it affect the significance of non-designated heritage assets and their settings?

Will it conserve or enhance heritage assets and the wider historic environment including landscapes, townscapes, buildings, structures and archaeological remains?

Will its construction and operation lead to harm to the significance of heritage assets, for example from the generation of noise, pollutants and visual intrusion?

Will it improve access to/and interpretation, understanding and appreciation of the significance of heritage assets?"

In addition to the above, Historic England would welcome the retention of "Will the Water Resources NPS avoid damage to important wetland areas with potential for paleoenvironmental deposits?"

Landscape and Townscape

The wording in this section could be amended as follows:

"Objective: To protect and enhance landscape, townscape and waterscape quality and visual amenity including areas of tranquillity and dark skies.

Guide Questions:

Will the Water Resources NPS have detrimental visual impacts?

Will the Water Resources NPS affect protected/designated landscapes or their setting?

Will the Water Resources NPS affect the intrinsic character or setting of local landscapes, townscapes or waterscapes?

Will the Water Resources NPS help to minimise light pollution and noise from construction and operational activities on residential amenity and on sensitive locations, receptors and views?

Will the Water Resources NPS affect public access to open spaces or the countryside?

Will it protect and enhance nationally and locally designated landscape, townscape and waterscape and their setting?"

7 Do you have any comments on the discussion on potential reasonable alternatives to the NPS (Section 2.4 of the AoS scoping report)? Should any further alternative scenarios be considered? Please support your suggestion with your reasoning.

Please answer the question:

N/A

8 Do you think that the proposed approach to assessing the NPS against the Habitats Regulations is appropriate? For example, you may consider if the approach described is proportionate and whether it would provide a suitable level of information about potential habitats impacts. If not, how do you think the intended approach should be amended, and why?

Please answer the question:

N/A

9 Do you think that the HRA Methodology Report sets out sufficient information to establish the context for the Screening Report and later Appropriate Assessment? If not, which areas do you think have been missed and where is the information available from.

Please answer the question:

N/A

Part 3: Review of nationally significant infrastructure projects definitions

10 Do you have evidence on the costs of potential supply schemes, especially those other than reservoirs, and potential time and cost savings from NSIP designation, to improve our economic analysis (see Annex B for more detail)?

Please answer the above question:

N/A

11 What are your views on the factors we have set out here for considering if schemes are nationally significant (see also Annex C)?

Please answer the question above:

N/A

12 Are there any further factors that we should take into account?

Please answer the above question :

N/A

13 Which of the two options is your preferred threshold for new nationally significant reservoir schemes? Please explain your reasoning, where possible using examples of previous reservoir schemes and schemes that are likely to be brought forward in future WRMPs.

Please answer the above question:

N/A

14 Which of the two options is your preferred threshold for new nationally significant water transfer schemes? Please explain your reasoning, where possible using examples of previous transfer schemes and schemes that are likely to be brought forward in WRMPs.

Please answer the above question :

N/A

15 Do you have any views on whether there would be benefit in including groups of smaller transfer schemes within the threshold? Please explain your reasoning.

Please answer the above question :

N/A

16 What do you see as the main benefits and risks of setting the same threshold for all infrastructure types? For example, do you see any reasons that the threshold for reservoirs and transfers should be / not be the same?

Please answer the above question :

N/A

17 What are your views on the inclusion of desalination schemes in the definition of nationally significant infrastructure? Please explain your reasoning, where possible providing examples of previous schemes or those that are likely to be brought forward in WRMPs.

Please answer the above question :

N/A

18 What should the threshold for desalination schemes be? Please explain your reasoning, where possible providing examples of previous schemes or those that are likely to be brought forward in WRMPs

Please answer the above question:

N/A

19 What are your views on whether effluent reuse schemes should be considered nationally significant? Please explain your reasoning, where possible providing examples of previous effluent reuse schemes or those likely to be brought forward in WRMPs.

Please answer the above question :

N/A

20 Do you have any further comments on what water resources infrastructure should or should not be considered nationally significant?

Please answer the question above :

N/A

Your details

21 What is your name?

Name:

Shane Gould

22 What is your email address?

Email:

shane.gould@HistoricEngland.org.uk

23 What is your organisation?

Organisation:

Historic England

24 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason.:

Consultee Feedback on the Online Survey

5 Overall, how satisfied are you with our online consultation tool?

Not Answered

Please give us any comments you have on the tool, including suggestions on how we could improve it. :