Historic England

Background.

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.

We welcome the opportunity to submit a response on the following points.

Priorities

1   Do you agree that these themes reflect the most pressing priorities for development of our Appraisal and Modelling guidance? If not, what other themes do you think we should be exploring?
2   What considerations should inform the scope and priorities of our strategy, particularly over the first 18-24 months?

These seem sensible themes (pages 21 and 22) – particularly "people and place", although we also have an interest in "transformational investments and housing", "WebTAG" and "modelling and appraisal tools". See further details below.

People and Place: capturing the range of impacts relevant to transport policy today

> *3   What should be our priorities for improving the appraisal of people and place and why? Please select up to three areas.*

Valuing Attractiveness and Public Health and Wellbeing are our priorities. The historic environment is an important part of these themes.

From our perspective, priorities for improving the appraisal of places – such as landscapes – need to be improved. In this respect, progress is being made with some infrastructure schemes. For example the current A303 scheme's economic appraisal includes a comprehensive quantitative (monetised) appraisal of the heritage benefits of the proposed road scheme ("…an estimated aggregate net

present value of £1.3 billion (2016 prices and values) for the removal of the section of the A303 for a tunnel"). The decision to invest in the A303 was informed by a study that was able to quantify heritage, based on "contingent valuation" also known as "willingness to pay" methods. Increasingly there is a realisation that conventional indicators and accompanying models used to estimate value are not comprehensive on their own, and so are failing their objective of measuring societal prosperity. We strongly advocate new modelling and valuation techniques that more comprehensively demonstrate heritage value. Only then will we "do the right thing" for our generation and future generations to come with respect to the historic environment.

Whilst we welcome the use of "natural capital", "ecosystem services" and similar concepts, we are nervous about techniques which only use a narrow or strict definition of these terms, as this might inadvertently exclude the historic environment from appraisals. "Natural capital" should be considered alongside the related concept of "cultural capital". We hope there will be an opportunity to engage with any appraisal techniques which use "ecosystem services" in the future, when we are better able to represent the values of heritage assets in this framework, and for the inclusion of "cultural capital" when that is further developed. We are working on these areas at present, and the publication *Heritage Counts* (forthcoming Autumn 2018), will consider "Heritage and the Economy" in detail and will be a useful reference for these discussions. Please also see our comments below (at the end) on Landscape.

Impacts on the historic environment can be positive as well as negative, so it will be important to recognise benefits as well as risks. For example, these might include improved access, better settings and so on. These might be captured as gains if appraising "cultural capital".

We use a number of approaches available for identifying and assessing the historic significance of present day landscapes or townscapes. They can be used singly or in combination, depending on the purpose, scope, and scale of a project and include:

- Historic characterisation, spatial planning and development
- Historic Landscape Characterisation (HLC)
- Historic Characterisation in Towns including the Extensive Urban Survey (EUS)
- Historic Area Assessments

Historic Area Assessments provide a full understanding of the historical development of an area such as a small town, suburb or village, or part of larger settlements. They set out to explain as well as describe, and to define the significance of these historic places. Details of this approach are set out in *Understanding Place: Historic Area Assessments*, published by Historic England, 7 April 2017.

We have set out more suggestions below in our section "General Comments".

Reflecting uncertainty over the future of travel

4 What should our priorities be for improving our understanding and treatment of uncertainty in modelling and appraisal and why? Please select up to three.

5 What do you see as the main challenges to adopting a more sophisticated approach to uncertainty in Business Cases and what suggestions do you have for overcoming these??

We have no comments to make on these questions.

Modelling and appraising transformational investments and housing

6 What should our priorities be for improving the modelling and appraisal of transformational investments and housing and why? Please select up to three.

7 What transformational impacts do you currently find it difficult to represent in a scheme appraisal? What are the barriers to their inclusion and how would you suggest these are overcome whilst maintaining a consistent and robust approach?

The transformational impacts of schemes should include the positive and negative impacts on the historic environment. See also our further comments below.

Supporting the application of WebTAG and making it more user friendly

8 What are the main barriers and challenges to applying WebTAG? How do you think these could be overcome?

9 What more could be done to articulate the flexibilities in WebTAG and support scheme promoters apply the guidance?

10 How can we improve the way in which WebTAG is presented? Why? We are particularly interested to hear about how we can improve accessibility and clarity of the guidance.

We welcome attempts to improve the accessibility of WebTAG. We also wish to see WebTAG fully aligned with the Green Book (see especially Appendix 2 of the Green Book), and placing more emphasis on well-being and non-use values. At present we feel there is a lack of social dimension in analyses, and that social prosperity and well-being need to be considered much more fully. WebTAG should also be aligned fully with the National Planning Policy Framework (July 2018) and the various Transport NPSs, in order to fully consider transport infrastructure and the historic environment (including off-site benefits and disbenefits, noise, vibration, etc). We would be happy to discuss all this in greater detail.

Developing modelling and appraisal tools that meet user needs

11 What should our priorities be for improving the development of modelling and appraisal tools and why? Please select up to three.

12 How can we best encourage innovation whilst maintaining a consistent and robust approach?

13 What new and emerging techniques and methods should we potentially explore and what specific problems might they solve?

We have suggested some possible areas of improvement in our earlier comments, and comments below.

General Comments

You have set out three separate indicators in which we have an obvious interest (see the infographic in section 2.6, p15) – Landscape, Townscape, and Historic Environment. "Landscape" and "Townscape" clearly include historic assets such as Listed Buildings, Scheduled Monuments, Conservation Areas, World Heritage Sites, Registered Battlefields and Registered Parks and Gardens and so on, as well as other important sites, buildings and areas which are not designated or formally protected.

For example, the European Landscape Convention (aka the Florence Convention, 2000, which the UK has ratified) defines "Landscape" in Article 1 as "an area perceived by people whose character is the result of the action and interaction of natural and/or human factors". (Please note this is a Council of Europe Convention not an EU one, and we will be continuing to use this definition). "Landscape" is therefore a complex of natural and cultural elements. It includes historic assets and the historic environment, and this historic element should not be forgotten when assessing it. We disagree with your infographic on this point, and believe it should be changed.

"Townscape" also clearly includes historic assets, some of which will be more historically significant and important than others. It may also include important areas such as Conservation Areas or World Heritage Sites.

Our major comment with the infographic and with your indicators is that it should be clearly understood that the "Historic Environment" is a cross-cutting theme.

Please also note that we use gender-neutral terminology and your "Historic Environment" section in the infographic might be better worded along the following lines: "The value of the surviving physical remains of past human activity."

We hope that these comments are helpful; please do get back to us if you have any queries.

This response was prepared by Amanda Chadburn (Senior National Infrastructure Adviser) and Adala Leeson (Head of Social and Economic Research and Insight) on behalf of Historic England.