



Historic England

National Infrastructure Assessment: Consultation

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 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 are a statutory consultee on all nationally significant infrastructure projects and have a close working relationship with High Speed 2, Network Rail, Highways England, National Grid and those involved in the Crossrail 2 proposals. Our role in national infrastructure focuses on responding to the potential impact of new and improved infrastructure on the historic environment, whilst ensuring those elements of England's historic infrastructure are fully considered as part of any future modernisation and enhancement programme. The importance of this legacy is nationally recognised by many of the buildings and structures being afforded statutory protection, but there are other parts of the historic environment that are of considerable local interest and valued by the public.

We welcome the opportunity to respond to the following questions:

Q 1. The Government has given the National Infrastructure Commission objectives to:

- foster long-term and sustainable economic growth across all regions of the UK
- improve the UK's international competitiveness
- improve the quality of life for those living in the UK

What issues do you think are particularly important to consider as the Commission works to this objective?

Historic England recognises and supports the need for economic growth and improvements in productivity and competitiveness. The economic importance of addressing the UK's infrastructure needs is highlighted throughout the consultation document, but a more balanced approach to sustainable development is needed with recognition that infrastructure is not provided in an economic vacuum. When environmental considerations are mentioned, this is often done in terms of meeting the UK's 'carbon and environmental commitments'. Whilst welcoming the objective to improve the quality of life for those living in the UK, we would also expect the Commission to take into account all three stands of

sustainable development in preparing the National Infrastructure Assessment as set out in the National Planning Policy Framework (NPPF [Department for Communities and Local Government, 2012]). These include social and environmental considerations, as well as economic; the historic environment is, of course, an important factor in all three.

Q 2. Do you agree that, in undertaking the NIA, the Commission should be:

- open, transparent and consultative
- independent, objective and rigorous
- forward looking, challenging established thinking
- comprehensive, taking a whole system approach, understanding and studying interdependencies and feedbacks?

Are there any principles that should inform the way that the Commission produces the NIA that are missing?

These principles, including the whole system approach, are commendable and we very much hope they are reflected in practice. In light of our response to Q1, the work of the Commission should not simply be driven by economic and fiscal considerations, but also needs to address all three strands of sustainable development as defined in the NPPF – economic, social and environmental. It is therefore important that advice/expertise is sought from the environmental sector given the 30 year time horizon for the National Infrastructure Assessment and its possible long-term implications.

Q 3. Do you agree that the NIA should cover these sectors in the way in which they are described?

This appears to be a sensible approach which follows the structure set out in the National Infrastructure Delivery Plan 2016-2021 and the National Infrastructure Pipeline (Infrastructure and Projects Authority). It should be noted that much of the nation's existing infrastructure is of considerable historic interest representing key stages in our transport and engineering history. The UK was the world's first industrial nation and a number of the most significant buildings and structures have been recognised as such and are subject to designation at a national, if not international level (listed buildings, scheduled monuments or world heritage sites) , whilst many others are recognised as being of local interest.

We understood the National Infrastructure Assessment to be a high level overview of the country's needs and priorities up to 2050. The reference on page 16 to the inclusion of specific projects, such as a new bridge, increased water capacity and pilot schemes, does not appear to fit within this approach, and we would welcome clarification as to the relationship between such projects and the original purpose, aims and objectives of the Commission.

Q 5. The NIA will seek to pull together infrastructure needs across sectors, recognising interdependencies. Are there particular areas where you think such interdependencies are likely to be important?

There are undoubtedly interdependencies between housing and infrastructure, and these should be considered, but the interdependencies between infrastructure and other forms of

development also need to be carefully considered, and an unbalanced approach which delivers only housing development (and not the other elements of successful communities and local economies) avoided. Care will also need to be exercised to ensure that infrastructure is not being used to determine future housing supply and its location, thereby impacting on, and possibly undermining, the plan-led planning system.

Q 6. Do you agree that the NIA should focus on these cross-cutting issues?

Whilst recognising the importance of considering cross-cutting themes, in an earlier consultation on the National Infrastructure Commission, Historic England expressed the need for further clarity on how the work of the Commission and its ‘endorsed’ recommendations will interact with the wider planning system, National Policy Statements and the National Planning Policy Framework. The current consultation notes the National Infrastructure Assessment ‘will also consider the planning system and how this interacts with decision-making to facilitate delivery’, but the only details provided so far are contained in the previous consultation together with the Government’s response. We also understand Government guidance is to be produced that will provide information to policy and decision-makers about how to use the Commission’s output which will be welcome.

Costs and providing good value for money are clearly important considerations, but this should not over-ride the importance of ensuring that the right scheme in the right place⁰ is proposed with high standards of design and quality being the benchmark. Much of our Victorian infrastructure was built to a very high standard and its quality is celebrated and appreciated today. We should aspire to meet similar standards if the provision of new infrastructure is to stand the test of time, contribute positively to our surroundings, and be more readily embraced by the communities it serves. There remains considerable scope for improvement in relation to the quality of infrastructure.

Q 7. Are there any other cross-cutting issues that you think are particularly important?

Environmental considerations are only addressed under the ‘cross-cutting issues’ in terms of meeting the UK’s ‘carbon and environmental commitments’. As well economic and fiscal matters, the Commission also needs to consider all three strands of sustainable development in preparing the National Infrastructure Assessment as set out in the NPPF. These include social and environmental considerations, as well as economic.

Q 8. Do you agree with this methodological approach to determine the needs and priorities?

References to the environment in paragraphs 57, 61 and 65 are noted, and we refer to our comments in Q1, Q3 and Q7 above.

It will be important for the Commission to take account of all three strands of sustainable development – economic, social and environmental – in preparing the National Infrastructure Assessment as set out in the NPPF. This will include both the protection and seeking positive improvements/enhancements to the quality of the built, natural and historic

environment, whilst recognising the inherent significance in much of the nation's historic infrastructure.

Under paragraph 67, we assume that as well as looking forward to long-term needs and priorities, the Commission will look back, to see what might be learned from past schemes to influence and improve the delivery of future proposals?

Q 10. Do you believe the Commission has identified the most important infrastructure drivers (set out below)? Are there further areas the Commission should seek to examine within each of these drivers?

The environment, together with climate change, is recognised as a key infrastructure driver and, whilst welcoming the statement on the 'need to enhance the environment', we suggest this should be widened in accordance with our previous comments and to align it with the NPPF – i.e. to protect and enhance the natural, built and historic environment.

Q12. In your view, are there any relevant factors that have not been addressed by the Commission in its methodological approach?

We refer to our comment to Q8 above.

Q 13. How best do you believe the Commission can engage with different parts of society to help build its evidence base and test its conclusions?

Whilst Historic England has no comment on the proposed engagement strategy, we offer the following suggestions on the expert round table and panel of experts:

- In developing the National Infrastructure Assessment it might be helpful to convene an expert round table to consider environmental matters. This could involve the relevant government departments (Department for Environment, Food and Rural Affairs and Department for Culture, Media and Sport), the statutory environmental bodies (Historic England, Natural England, Environment Agency, Forestry Commission) together with other key bodies/organisations.
- Consideration might also be given to setting up a panel of experts covering sustainability issues, to include the environment and climate change.

We also welcome the commitment by the National Infrastructure Commission to meet key stakeholders from across infrastructure sectors and related disciplines, and would be willing to be involved in this process. Historic England looks forward to working with the Commission in preparing the UK's first National Infrastructure Assessment.

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