



National Policy Statement For Geological Disposal Infrastructure – Implementing Geological Disposal

Response form

The closing date for receipt of responses is 19/04/2018

Please return completed forms by post or email to:

GDF Team
Department for Business, Energy and Industrial Strategy
3rd Floor Victoria
1 Victoria Street
SW1H0ET

Tel: 020 7215 5000

Email: GDFlanduseplanning@beis.gov.uk

About You

TO BE COMPLETED

Shane Gould

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Historic England

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About You – Organisations

If you are responding as an individual, you do not need to answer the rest of this section, go directly to the section titled 'Your Response'. **If you are answering on behalf of an organisation, a response is required to the rest of this section.**

What is the name of your organisation? Historic England.

Who does this organisation represent? 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.

What type of organisation is it?

Please tick **one** box in the table.

	Organisation
<input type="checkbox"/>	Local Authority
<input type="checkbox"/>	Local Enterprise Partnership
<input type="checkbox"/>	Civil Society Group
<input type="checkbox"/>	Regulator
<input type="checkbox"/>	Charity
<input type="checkbox"/>	Business
<input type="checkbox"/>	Non-Governmental Organisation
<input type="checkbox"/>	Religious Organisation
<input type="checkbox"/>	Academic Institution
<input checked="" type="checkbox"/>	Other

If you have selected other, or would like to provide more information, please provide further details. We are a non-departmental public body sponsored by the Department for Digital, Culture, Media and Sport – see above.

Approximately, how many members are there of / employees are there in your organisation?

<input type="checkbox"/>	1 – 10
<input type="checkbox"/>	11 – 49
<input type="checkbox"/>	50 – 249
<input checked="" type="checkbox"/>	250 – 999
<input type="checkbox"/>	1000 – 4999
<input type="checkbox"/>	5000 or more
<input type="checkbox"/>	Don't know

How did you assemble the views of your members?

Please answer here [Discussions with relevant staff members.](#)

Is there any further information you would like to provide about your organisation?

Please answer here [Click here to enter text.](#)

Your Response

Are you happy for your response to be used as part of Parliamentary scrutiny? This is a required response.

Responses to this consultation, including names, may be used in Parliament as evidence in the Parliamentary scrutiny process, and may be published under the authority of Parliament, unless respondents specifically request confidentiality.

If you would not like your response to be used in this way, it would be helpful if you could explain to us why.

Yes

Yes, but without identifying information

No, I don't want my response to be used as part of parliamentary scrutiny

Comments: [Click here to enter text.](#)

Are you happy for your response to be published with identifying information? This is a required response.

We will summarise all responses and place this summary on the GOV.UK website. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

Yes

No, I would like identifying information removed

Comments: [Click here to enter text.](#)

Are you happy for your response to be disclosed? This is a required response.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please say so clearly in writing when you send your response to the consultation. It would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

Yes

No, I want my response to be treated as confidential

Comments: **Click here to enter text.**

Responding to this consultation

The questions in this consultation are structured around 5 aspects of the National Policy Statement:

1. The need for geological disposal infrastructure as presented in the National Policy Statement
2. Assessment principles as presented in the National Policy Statement
3. Generic impacts as presented in the National Policy Statement
4. The Appraisal of Sustainability report supporting the National Policy Statement
5. The Habitats Regulations Assessment report supporting the National Policy Statement

There are 7 questions in total. You can respond to all sections of the consultation, or skip those sections which don't interest you.

Each section contains a brief overview from the consultation document and directs you to further information within the draft National Policy Statement or supporting reports.

How did you hear about this consultation?

<input type="checkbox"/>	Gov.uk website
<input type="checkbox"/>	National Media
<input type="checkbox"/>	Social Media
<input type="checkbox"/>	Local Media
<input type="checkbox"/>	Professional Body
<input type="checkbox"/>	Non-Governmental Organisation (NGO)
<input checked="" type="checkbox"/>	Other
<input type="checkbox"/>	Prefer not to say

If you would like, you can provide further details about how you heard of this consultation.

Please answer here: [Direct email contact from BEIS.](#)

Need for geological disposal infrastructure

Chapter 3 of the draft National Policy Statement outlines the need for geological disposal infrastructure. A summary can be found in paragraphs 3.6 to 3.9 of the consultation document.

- 1. Does the draft National Policy Statement provide suitable direction to the Planning Inspectorate and Secretary of State on the need for geological disposal infrastructure?**

Please answer here: [This question lies beyond Historic England's remit.](#)

Assessment Principles

Chapter 4 of the draft National Policy Statement sets out the assessment principles against which applications relating to geological disposal infrastructure are to be decided. A summary can be found in paragraphs 3.10 to 3.13 of the consultation document.

- 2. Do the assessment criteria adequately address the principles that the developer, the Planning Inspectorate and the Secretary of State should take into account in an application for development consent? If not, what further information on the assessment criteria is required?**

Please answer here: The comments given below are to ensure overall consistency of approach between existing and draft National Policy Statements (notably the *National Policy Statement for National Networks* (Department for Transport, 2014) and *Revised Draft Airports National Policy Statement* (Department for Transport, 2017)), and the Government's *National Planning Policy Framework* (Department for Communities and Local Government, 2012).

- **Relationship between the National Policy Statement and National Planning Policy Framework**

The relationship between the *National Policy Statement (NPS)* and *National Planning Policy Framework (NPPF)* is set out under 'Assessment Principles' in paragraphs 4.1.6 and 4.1.7 of the *NPS*. Similar ground is covered in the *National Policy Statement for National Networks*, although paragraph 1.18 of the latter states: 'The *NPPF* is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project'.

Furthermore, paragraph 3.3 of the *National Policy Statement for National Networks* notes: 'In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the *NPPF* and the Government's planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes. The Government's detailed policy on environmental mitigations for developments is set out in Chapter 5 of this document'. Historic England believes this statement was helpful and has pressed for something similar in the *Revised Draft Airports National Policy Statement*.

For consistency, we advise both statements are included in the context of paragraphs 4.1.6 and 4.1.7 of the *Draft NPS for Geological Disposal Infrastructure*.

- **Criteria for 'Good Design' for Geological Disposal Infrastructure**

When compared with the *National Policy Statement for National Networks* and *Revised Draft Airports National Policy Statement*, we note the following has been omitted from the end of paragraph 4.5.4 and recommend its addition, especially given the size of proposed facilities: 'It should also mitigate any existing adverse impacts wherever possible, for example, in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as practicable, taking into account capital cost, economics and environmental impacts'.

Generic Impacts

Chapter 5 of the draft National Policy Statement sets out the generic impacts to be considered by the developer and the Examining Authority. A summary can be found in paragraphs 3.14 to 3.15 of the consultation document.

3. Does the draft National Policy Statement appropriately cover the impacts of geological disposal infrastructure and potential options to mitigate those impacts? Please provide reasons to support your answer.

Please answer here: Whilst we welcome the consideration of historic environment impacts in Chapter 5 of the Draft National Policy Statement, Historic England has been advising the Department for Transport in drafting the historic environment section of the Revised Draft Airports National Policy Statement (paragraphs 5.185 – 5.210), and the corresponding paragraphs of the Draft National Policy Statement for Geological Disposal Infrastructure should be updated to reflect this (where relevant [paragraphs 5.6.1 – 5.6.25]). These changes are highlighted in **bold**.

5.6.3 – Add the following at the end of the second sentence: ‘or landscapes, **or any combination of these**’.

5.6.6 – First sentence: ‘The Secretary of State **will ...**’.

Footnote 84: ‘Secretary of State for **Digital**, Culture, ...’.

5.6.8 – At the end of the second sentence add: ‘**Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment.**’ and at the end of the paragraph: ‘**The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage asset affected can be adequately understood from the application and supporting documents**’.

Insert new paragraph after 5.6.8: ‘**Detailed studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts based on guidance given in *The Setting of Heritage Assets*^x. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to assess impact**’. This should be accompanied by the following footnote: x - <https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.

5.6.9 – First bullet: ‘... through **a range of measures such as sensitive design, ...**’
Second bullet: ‘... those heritage assets **that are at risk**, or which ...’.

5.6.10 – First sentence: ‘... the Secretary of State **will seek ...**’.

5.6.11 – It might be helpful to reference the Regulations as a footnote: <http://www.legislation.gov.uk/ukxi/2010/305/regulation/3/made>.

5.6.12 – First sentence: ‘... the Secretary of State **will take ...**’.

5.6.13 – First sentence: ‘ ... The Secretary of State **will** take ... ’, and ‘ ... including to **their quality of life, their economic vitality, and to the public’s enjoyment of these assets**’. Second sentence: ‘The Secretary of State **will** also ... ’.

5.6.14 – First sentence: ‘ ... the Secretary of State **will** give ... ’, after the second sentence add: ‘**The Secretary of State will take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness**’. In order to be clear, sentences five and six should be relocated to follow sentence three, and add ‘**Protected Wreck Sites**’ after Listed Buildings (final sentence).

5.6.16 – Second sentence: ‘ ... asset: The Secretary of State **will** ... ’.

To ensure consistency with the *NPPF* (paragraph 135), the following should be inserted between paragraphs 5.6.17 and 5.6.18 (a similar point has also been raised in our response to the *Revised Draft Airports National Policy Statement*): ‘**The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset**’.

5.6.18 – Second sentence: ‘ ... The Secretary of State **will** treat ... ’.

5.6.19 – First sentence: ‘ ... the Secretary of State **will** consider ... ’ and amend the last sentence to ensure consistency with the *National Policy Statement for National Networks*, ‘**that will prevent the loss occurring until it is reasonably certain that the relevant part of the development has commenced**’. A similar point has been raised in our response to the *Revised Draft Airports National Policy Statement*.

5.6.21 – Footnote 87 should be moved from paragraph 5.6.10 (bullet point four) to the end of this section and prefixed: ‘**Historic Environment Good Practice Advice in Planning 2 provides further advice on managing significance in decision-taking in the historic environment**’.

5.6.23 – Sentence one: ‘ ... the Secretary of State **will** require ... ’ and sentence three: ‘Applicants should be required to **publish this evidence and** to deposit copies of the reports ... ’.

5.6.25 – First sentence; ‘ ... the Secretary of State **will** consider ... ’.

Under Landscape and Visual Impacts (5.10):

Paragraph 5.157 from the *National Policy Statement for National Networks* (5.222 in the *Revised Draft Airports National Policy Statement*) is absent and should be included: ‘**In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape**

and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation’.

We also suggest paragraph 5.10.1 is amended in line with paragraph 5.211 of the *Revised Draft Airports National Policy Statement*. ‘In this context, references to landscape should be taken as covering **local landscape, waterscape and townscape character and quality, where appropriate**’.

Appraisal of Sustainability

This consultation also seeks views on the accompanying Appraisal of Sustainability report, which is a supporting environmental appraisal to the draft National Policy Statement.

The Appraisal of Sustainability assesses the potential socio-economic and environmental impacts of the draft National Policy Statement. A summary can be found in paragraphs 4.1 to 4.6 of the consultation document.

Appraisal of the sustainability Effects of the Draft NPS and Reasonable Alternatives

Chapter 5 of the Appraisal of Sustainability – Appraisal of the Sustainability effects of the draft NPS and reasonable alternatives – summarises the likely significant environmental and socio-economic effects of the draft National Policy Statement and any reasonable alternatives, including cumulative effects, mitigating measures, uncertainties and risks. The detailed appraisals are contained in Appendix B of the Appraisal of Sustainability.

4. Do you agree with the findings (of ‘likely significant effects’) from the Appraisal of Sustainability report and the recommendations for enhancing the positive effects of the draft National Policy Statement? Please provide reasons to support your answer.

Please answer here: We do not agree with the findings (of ‘likely significant effects’) from the Appraisal of Sustainability Report. The key areas that fall within our remit include ‘Cultural Heritage’, and ‘Landscape and Townscape’, where the likely significant effects on the AoS Objective have been identified as positive (or significant positive for the ‘Draft NPS including Exclusionary Criteria). This being set out for ‘Cultural Heritage’ in Table 5.4 and paragraphs 5.135, 5.138, 5.139 and 5.141; for ‘Landscape and Townscape in Table 5.15, paragraphs 5.149, 5.153, 5.155; and for both in Table 5.17.

We feel such assumptions are premature and inaccurate at this early stage, and in the absence of detailed site-specific information. Furthermore, they appear to be undermined in Appendix B Detailed Appraisal including Baseline and Contextual Information, where the following statement is provided under ‘Cultural Heritage’: ‘The draft NPS sets out in detail the range of considerations which will be part of the decision making process, including the importance of understanding the nature of the culture heritage assets which could be affected (including their setting) and opportunities for their enhancement where appropriate. The guidance reflects policy set out in the NPPF with regard to conserving and enhancing the historic environment (section 12, paras 126–141). As such, the likely effects are positive and impacts sought will be minimised, **although broader strategic development considerations, such as the need for the facility, could override cultural heritage interests where impacts cannot be avoided**’ (our emphasis [pages 351-352]). A similar statement is given under the ‘Landscape and Townscape’ heading (page 371).

For these reasons, we strongly suggest that at this stage, both ‘Cultural Heritage’ and ‘Landscape and Townscape’ are graded as yellow where the ‘effects are uncertain/there is insufficient information on which to determine effect’. Similar

comments apply elsewhere in the report and its appendices where these matters are also considered.

Para 5.127 – For consistency, the reference to potential mining remains from Appendix B Detailed Appraisal including Baseline and Contextual Information should be included here (page 353) and in Table 5.17 (page 109).

Conclusions and Monitoring

Chapter 6 of the Appraisal of Sustainability – Conclusions and Monitoring – summarises the main effects of the draft National Policy Statement and reasonable alternatives to the National Policy Statement and presents views on implementation and monitoring. The reasons for selecting the draft National Policy Statement as proposed and for the rejection of alternatives are explained.

5. Do you agree with the conclusions of the Appraisal of Sustainability report? If not, please explain why.

Please answer here: In line with our comments to Q 4 above, we do not agree with the conclusions in of the Appraisal of Sustainability Report and especially the points made in paragraphs 6.2 and 6.4:

- 'Overall, the appraisal contained in this AoS Report has found that the implementation of the draft NPS is likely to have positive effects across all of the AoS objectives that have been used to help characterise the socio-economic and environmental effects of the draft NPS' (para 6.2).
- 'No negative effects (significant or minor) on the AoS objectives have been identified during the appraisal of the draft NPS' (para 6.4).

For Table 6.1

Page 120 - Cultural Heritage amend as follows:

- Bullet two: 'Monitoring predicated levels of harm to the historic environment'.
- Bullet three: 'Monitoring of mitigation strategy during construction for built heritage and below-ground archaeological remains and for setting during construction and operation'.
- New bullet to be added at the top of this list: 'Monitoring the assessment of significance of the heritage assets and their setting'.

Under 'Possible Sources of Information', the Developer should head this list.

For Landscape and Townscape redraft as follows:

- 'Change in the quality of character or status of the landscape, townscape and waterscape'.
- Change in settings and views of designated/local landscapes, sensitive locations, sites and receptors'.

- ‘Monitor/review off-site mitigation and enhancement strategy and its implementation’.

Habitats Regulations Assessment

This consultation also seeks views on the accompanying Habitats Regulations Assessment report, which is a supporting environmental appraisal to the draft National Policy Statement.

The Habitats Regulations Assessment is an assessment of whether there are any 'likely significant effects' on any 'European site'. A summary can be found in paragraphs 4.7 to 4.12 of the consultation document.

- 6. Do you agree with the findings from the Habitats Regulations Assessment report for the draft National Policy Statement? Please provide reasons to support your answer.**

Please answer here: [Habitats Regulations Assessment does not fall with our remit or area of expertise.](#)

Other Views

7. Do you have any other comments on the draft National Policy Statement and the accompanying documents (Appraisal of Sustainability, Habitats Regulations Assessment)?

Please answer here: *Appraisal of Sustainability Report: Appraisal of Sustainability of the National Policy Statement for Geological Disposal Infrastructure.*

As with our response to Q 2 and Q 3 above, many of the comments below are to align the *Appraisal of Sustainability Report* and its wording with similar work being undertaken in association with recent and other emerging National Policy Statements, particularly the *Revised Draft Airports National Policy Statement*, the proposed *National Policy Statement for Water Resources* and the *New National Policy Statement for Nuclear Power with Single Reactor Capacity over 12 Gigawatt Beyond 2025*. Where relevant, our response to the consultations on these documents has also been included.

Non-Technical Summary

Page XV – For Cultural Heritage redraft as follows:

Appraisal of Sustainability Objective 12: ‘**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 setting?**’
- Will it affect the significance of non-designated heritage assets and their setting?
- Will it conserve and 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 through the generation of noise, pollutants and visual intrusion?
- Will it improve access to/and interpretation, understanding and appreciation of the significance of heritage assets?’

Page XVI – For Landscape and Townscape amend as follows:

Appraisal of Sustainability Objective 13: ‘**To protect and enhance landscape, townscape and waterscape quality and visual amenity, including areas of tranquillity and dark skies**’.

Guide Questions:

- Bullet one: ‘ ... National Policy Statement have **detrimental** impacts ... ’.
- Bullet three: ‘ ... setting of local landscapes, townscapes **or waterscapes?**’.
- Bullet four: ‘ ... minimise light pollution **and noise** from ...’; ‘ ... sensitive locations, receptors **and views?**’
- New bullet: ‘**Will it protect and enhance nationally and locally designated landscape, townscape, waterscape and their settings?**’

Page XXV – For Cultural Heritage amend as follows:

- Bullet two: ‘**Monitoring predicated levels of harm to the historic environment**’.
- Bullet three: ‘**Monitoring of mitigation strategy during construction for built heritage and below-ground archaeological remains and for setting during construction and operation**’.
- New bullet to be added at the top of this list:: ‘**Monitoring the assessment of significance of the heritage assets and their setting**’.

Under ‘Possible Sources of Information’, the Developer should head this list.

Page XXV – For Landscape and Townscape redraft as follows:

- ‘**Change in the quality of character or status of the landscape, townscape and waterscape**’.
- ‘**Change in settings and views of designated/local landscapes, sensitive locations, sites and receptors**’.
- ‘**Monitor/review off-site mitigation and enhancement strategy and its implementation**’.

Context and Baseline

Table 3.3, page 50, Cultural Heritage – Registered Battlefields and Protected Wreck Sites have been omitted.

Appraisal Methodology

Table 4.3, pages 58-59 - For Cultural Heritage redraft as follows:

Appraisal of Sustainability Objective 12: ‘**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 setting?**’
- ‘**Will it affect the significance of non-designated heritage assets and their setting?**’

- Will it conserve and 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 through the generation of noise, pollutants and visual intrusion?
- Will it improve access to/and interpretation, understanding and appreciation of the significance of heritage assets?

Table 4.3, page 59 – For Landscape and Townscape amend as follows:

Appraisal of Sustainability Objective 13: ‘To protect and enhance landscape, townscape and waterscape quality and visual amenity, including areas of tranquillity and dark skies’.

Guide Questions:

- Bullet one: ‘ ... National Policy Statement have detrimental impacts ... ’.
- Bullet three: ‘ ... setting of local landscapes, townscapes or waterscapes?’.
- Bullet four: ‘ ... minimise light pollution and noise from ...’; ‘ ... sensitive locations, receptors and views?’
- New bullet: ‘Will it protect and enhance nationally and locally designated landscape, townscape, waterscape and their settings?’

Appendix A Assessment Guide Questions and Associated Guidance on Significance

Cultural Heritage (page 24)

Redraft Objective/Guide Questions as above:

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 setting?’
- Will it affect the significance of non-designated heritage assets and their setting?
- Will it conserve and 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 through the generation of noise, pollutants and visual intrusion?

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

Landscape and Townscape (page 26)

Revise Objective/Guide Questions as above:

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

Guide Questions:

- Bullet one: '... National Policy Statement have detrimental impacts ...'.
- Bullet three: '... setting of local landscapes, townscapes or waterscapes?'
- Bullet four: '... minimise light pollution and noise from ...'; '... sensitive locations, receptors and views?'
- New question: 'Will it protect and enhance nationally and locally designated landscape, townscape, waterscape and their settings?'

Appendix B Detailed Appraisal including Baseline and Contextual Information

Cultural Heritage, Chapter 12

Pages 341-347 largely repeat the *Appraisal of Sustainability of the National Policy Statement for Water Resources Scoping Report Appendix B* and our comments on this document (below) are also of relevance here:

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 and 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 Advice Note 8: Sustainability Appraisal and Strategic Environmental Appraisal should be added to the list of Historic England advice.

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 'Overview of the Baseline', 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, and reference should also be made to Historic Environment Records as valuable sources of information.

Furthermore, the 'Objective and Guide Questions' in Table 12.1 need to be amended in line with the comments above.

For Table 12.3:

- We refer you to our comments in Q 4 with regard to the grading.
- Page 353, bullet seven - amend '... to minimise ground disturbance, **direct and indirect impacts on heritage assets (including setting), etc.**'
- Page 353, bullet eight – revise: '... **Formulate historic environment mitigation strategy with appropriate local authority heritage staff (including both archaeological and historic buildings conservation officers), Historic England and other authorities.**'
- Page 353, add further bullet - '**Consider enhancement opportunities**'.
- Page 354, relocate tenth bullet point to beneath bullet four.
- Page 354, add further bullet beneath bullet point five – '**Avoid other heritage assets where possible or take steps to minimise adverse effects**'.
- Page 354, bullet nine – amend 'Seek opportunities to maintain and enhance access to heritage assets where appropriate **in liaison with local community**'.
- Page 354, bullet 11 – amend '... appropriate **in liaison with local community**'.
- Page 354/5, bullet one – amend '... arrangements **in liaison with local community**'.
- Page 356 Summary Appraisal of Likely Significant Effects – Again we refer you to our comments in Q 4 above.

Landscape and Townscape, Chapter 13

Pages 358-366 largely repeat the *Appraisal of Sustainability of the National Policy Statement for Water Resources Scoping Report Appendix B* and our comments on this document (below) are also of relevance here.

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.

Furthermore, the 'Objective and Guide Questions' in Table 13.1 need to be amended in line with the comments above.

For Table 13.3

- We refer you to our comments in Q 4 with regard to the grading.
- Page 373, fifth bullet – revise ‘... landscape features where possible **and detrimental impact on setting**’.
- Page 374, ninth bullet, Construction – revise ‘... integrated way with ecology/biodiversity/**historic environment** mitigation’.
- Page 379 Summary Appraisal of Likely Significant Effects – Again we refer you to our comments in Q 4 above.

Appendix C Mitigation and Enhancement Measures

Cultural Heritage including Architectural and Archaeological Heritage

Page 9, third bullet, Mitigation, Site Investigation – revise ‘... to minimise ground disturbance, **direct and indirect impacts on heritage assets (including setting), etc.**’

Page 9, fourth bullet, Mitigation, Site Investigation – revise ‘... **Formulate historic environment mitigation strategy** with appropriate **local authority heritage staff (including both archaeological and historic buildings conservation officers), Historic England** and other authorities.’

Page 9, Mitigation, Site Investigation, add further bullet – ‘**Consider enhancement opportunities**’.

Page 9, fourth bullet, Mitigation, Construction – revise ‘**Enhancement of heritage assets, where appropriate, in liaison with local community**’.

Page 9, fifth bullet, Mitigation, Construction – relocate to ‘Site Investigation’ heading.

Page 10, second bullet Mitigation, Operation and Closure – revise ‘... for any access arrangements **in liaison with local community**’.

Landscape and Visual Impacts

Page 13, second bullet, Mitigation, Site Investigation – revise ‘... landscape features where possible **and setting**’.

Page 14, fifth bullet, Mitigation, Construction – revise ‘... integrated way with ecology/biodiversity/**historic environment** mitigation’.

Questions

Thank you for completing the consultation.

Once this consultation has closed, the Government will consider all comments received and, if necessary, the draft National Policy Statement will be revised to take account of consultation responses and the recommendations from Parliamentary scrutiny, prior to approval ('designation') of the National Policy Statement.