



Historic England

Department for Transport
Shaping the Future of England's Strategic Roads: Consultation on Highways England's Initial Report
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.

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

Question 3

**Do you think Highways England's proposals meet the needs of people affected by the presence of the SRN?
If not, what could be done differently?**

The presence of the SRN directly affects people, places and their environment (built, natural and historic), with the latter being of considerable public interest. The Government's *National Planning Policy Framework* (NPPF) 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).

Historic England has been working closely with Highways England to ensure the historic environment is recognised and taken into account during the delivery of RIS 1. This has led to the appointment of a Principal Cultural Heritage Adviser, which we very much welcome, together with the preparation of good practice guidance by Highways England on *Consulting the Statutory Environmental Bodies on Proposed Highways England Major Projects*. At a regional level, some of our local teams have established good working relationships with Highways England, both in the delivery of road schemes and identifying potential projects for the designated funds, but this has not been consistent. We feel our expert input could have been much improved, had we been more meaningfully engaged at a national and local level, to the greater benefit of the historic environment. Early engagement is also encouraged, as this maximises the benefit of advice and minimises unnecessary cost and delays within emerging proposals, which can take the historic environment into account sooner rather than later in their design.

A number of these points are explored in further detail below and it is very much hoped these are considered in taking RIS 2 forward.

Question 4

Do you agree with Highways England's proposals for:

- **Four categories of road and the development of Expressways (Initial Report sections 4.4.3 and 5.3.6).**

The network of the future needs to acknowledge all road users, including both local and non-motorised users, together with the landscape in which it sits. In our response to the *Expressways: Draft Interim Advice Note*, the potential scale and impact of this programme on the landscape and the historic relationships of places was noted and a number of concerns raised.

Expressways, by their very nature, will be governed by efficiency of speed with limited access, which is likely to affect the relationship between the SRN and the surrounding landscape/townscape. Requirements for grade separated junctions and the possible severance caused to local roads and historic places is likely to have consequences for the significance and experience of historic places and heritage assets in the vicinity of the routes, as well as potential direct impacts on individual sites and the wider historic environment. Many strategic routes are of also historic interest and the programme could have implications for the historic significance of the national road network and its associated heritage assets. For example, one of the main objectives of the environmental designated funds is to address some of the key environmental problems created as a result of the road network – the reduction and minimising of environmental impacts should therefore be a fundamental objective (including those affecting the historic environment).

In developing this programme of smart motorways, expressways (that may become motorways) and all-purpose trunk roads (which includes the parallel consultation on the Major Road Network), care will need to be exercised to avoid a 'one-size fits all' solution based purely on heavy engineering solutions. Junction improvements, road widening, new signage and the installation of concrete barriers 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. Given the pace of technological change, the need to future-proof all designs will also be necessary to guard against possible redundancy within a very short space of time.

The use of Highways England's Strategic Design Panel, scheme Design Review Panels and the Strategic Panel's recently produced principles of good road design will be fundamental to getting this right, together with the meaningful involvement of the statutory environmental bodies, local authorities (including specialist staff with environmental expertise) and those local communities who are likely to be directly affected, if we are to avoid the mistakes of the past.

- **Operational priorities (Initial Report section 5.1)**

The increasing take-up of electric vehicles, together with the introduction of connected and autonomous vehicles presents significant opportunities in the way roads are planned, designed and operated. By reducing pollution and noise, the potential environmental benefits are considerable and as vehicles become more technologically sophisticated, it should be possible to dramatically reduce the amount of highway furniture that has had such a detrimental impact on our rural and urban environment.

However, care will need to be exercised to ensure these major benefits are not then off-set by possible environmental impacts resulting from changes to the design and use of roads, such as unnecessary widening and junction improvements that seek to reduce congestion and allow continuous vehicle flows, or other measures to support connected, driverless and electric vehicles. For example, the introduction of a network of charge points on the SRN will require careful consideration and control to avoid unnecessary clutter, especially in those areas which are environmentally sensitive, whereas other interventions, such as new and updated signage, may not be necessary in a few years' time.

- **Infrastructure priorities (Initial Report section 5.2)**

The above point with regard to minimising the environmental impact of new and replacement signage, lighting, roadside technology and continuous concrete barriers, together with the need to ensure such interventions do not quickly become redundant as a result of technological change, is also relevant here.

Whilst welcoming the reference to delivering heritage objectives on the 'soft estate', this will require information on the location, significance and condition of heritage assets. A number of important sites lie on or adjacent to the SRN, and the road network itself is of historic interest, with many routes being originally laid out by the Turnpike Trusts or created during the Roman period. Some heritage assets will be protected as listed buildings or scheduled monuments, whereas many others are of considerable local interest.

Unfortunately, Highways England's programme of Cultural Heritage Asset Management Plans, which provides information on its heritage estate, is incomplete. We have also expressed disappointment over the draft Cultural Heritage Action Plan and its lack of ambition, when compared with the Biodiversity Action Plan, with many of the actions already out of date. Highways England's Historical Railways Estate (Initial Report, paragraph 2.6) is also likely to contain a large number of heritage assets, but it has been difficult to obtain basic information on its holdings and their condition.

At present Highways England is not meeting all the requirements of the [Protocol for the Care of the Government Historic Estate](#), which has been developed by Historic

England and the Department of Digital, Culture, Media and Sport. This Protocol sets out a consistent, co-ordinated approach to protecting heritage assets and is mandatory for Government departments and agencies. As has been previously expressed, we are prepared to work with Highways England to help identify the heritage assets on the SRN, their condition and provide advice on appropriate programmes of repair and other interventions, where necessary.

- **Enhancement priorities (Initial Report section 5.3)**

In taking forward current and future schemes, Highways England should seek and act on the advice of the Statutory Environmental Bodies (including Historic England) as early in the process as possible and in accordance with Highways England's good practice guidance; *Consulting the Statutory Environmental Bodies on Proposed Highways England Major Projects*. We are already engaged in the six strategic studies announced in the first RIS and would look for similar opportunities with the North of England Wider Transport Connectivity Study and Midlands Motorway Hub Study. The relevant specialist local authority environmental staff (including both archaeological and conservation officers) should also be involved in the process from the outset.

All future schemes must take account of the Government's *NPPF* and *National Policy Statement for National Networks*, and it is assumed they 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. We understand the *DMRB* is to undergo significant revision during the current road period and look forward to the opportunity to comment on emerging drafts.

- **A local priorities fund (Initial Report section 5.3.8)**

The proposed fund for tackling smaller schemes is noted and, in response, we refer you to our comments above on the need to assess impacts on the historic environment. It may be that Historic England can assist in the development and implementation of this fund.

- **Future studies (Initial Report section 5.3.11)**

All future studies must be evidence-based, including an assessment of potential environmental impacts. They should be informed by relevant Government policy and involve both the Statutory Environment Bodies, together with relevant specialist local authority environmental staff, from the outset.

- **Designated funds (Initial Report section 5.4)**

Historic England has found it extremely difficult to engage with the designated funds, including those relating specifically to the cultural heritage. Despite suggesting possible projects and encouraging proactive liaison with our local offices, this has not happened and we are unclear how proposals are being selected and taken forward.

The current situation has been made more challenging by the incomplete nature of Highways England's Cultural Heritage Asset Management Plans, (see above) and without information on the nature and condition of its own historic estate, it has been very difficult to effectively prioritise resources to meet the objectives set out in *Highways England's Delivery Plan 2015 – 2020* (2015), and of course to comply with the *Protocol for the Care of the Government Historic Estate*.

Paragraph 6.17 contains the following statement:

'Cultural Heritage

Highways England will be utilising the Environment Fund to enhance the condition of cultural heritage sites and historic features either in our ownership or in proximity to the network.

Key areas of focus will be:

- *Reviewing and confirming the 'at risk' and 'unvalidated' condition status for assets identified in the Department for Transport's Historic Buildings Annual report, and identifying a future programme of interventions along with associated costs by March 2016.*
- *Enacting conservation measures at those identified heritage assets most at risk by end of this Road Period.*
- *Reviewing the influence of the network on the setting and condition of the historic environment close to the network, identifying and delivering enhancement opportunities.*

By delivering on these commitments we will also meet and comply with the requirements of the 'Protocol for the Care of the Government Historic Estate'

This lack of dialogue, feedback and transparency remains a serious concern, which we have shared with the Office for Rail and Road. Care also needs to be exercised to ensure environmental benefits in one area do not result in disbenefits elsewhere, and that wherever possible synergies should be sought, thereby providing multiple benefits across funding streams.

By introducing a more holistic fund that covers human wellbeing, and the natural, built and historic environment, it is feared the current allocation to heritage will become effectively 'lost', thereby making it more difficult for Highways England to meet its obligations set out in *Protocol for the Care of the Government Historic Estate*. Historic England is prepared to help Highways England in delivering these funds during both RIS 1 and RIS 2 in an efficient and effective manner as described in the Initial Report (page 83), and we suggest a meeting is arranged between all parties, including the Department for Transport, to discuss how best to take this forward.

- **Performance measures and targets (Initial Report section 6.3)**

Unlike the natural environment, there are no Key Performance Indicators or targets for the historic environment as part of the current RIS and we have been working with

Highways England on developing a solution for the next road period by suggesting two metrics.

The first is based on the cultural heritage section of *Highways England's Delivery Plan 2015 – 2020* (2015, paragraph 6.1.7), and ties in with the environmental designated funds, whilst helping to meet the requirements of the *Protocol for the Care of the Government Historic Estate*:

- 1) Reduction in the number of heritage assets at risk, both in Highways England's ownership or in proximity to the strategic road network – to be reported on an annual basis.

The second is perhaps more challenging and would seek to demonstrate that the future road programme is not having further adverse impacts on the historic environment:

- 2) To avoid and minimise harm to heritage assets or putting heritage assets at risk as a result of works to the Strategic Road Network – to be reported on an annual basis.

Question 5

Are there any other proposals in the Initial Report that you do not agree with? If so, which ones and what could be done differently?

We welcome the statement in the Initial Report that the solution in the majority of cases is to build better rather than new roads, together with the aspiration to run a network which works harmoniously with its surroundings to deliver an overall positive impact on the environment. However, with the focus on smart motorways, expressways (that may be designated as motorways), the creation of a Major Road Network (subject to a separate consultation) and its associated works, the delivery of this environmental aspiration does appear challenging.

As mentioned before, a heavy engineering solution and a one-size-fits-all approach is not appropriate; instead, an approach informed by an understanding of the character, interconnectedness and sensitivity of 'place' appears vital. To achieve this, the use of Highways England's Design Panel, individual scheme Design Reviews and adherence to the principles of good design in Highways England's recent Design Guide will be critical, together with the meaningful involvement of the statutory environmental bodies, local authorities (including specialist staff with environmental expertise) and those local communities who are directly affected. After all, one of the main objectives of the designated funds is to mitigate and reduce some of the most severe environmental impacts resulting from when the SRN was initially created during the 1960s-70s and it would be unfortunate if further problems were introduced during the delivery of RIS 2.

Question 7

How far does the Initial Report meet the Government's aims for RIS2 (economy, network capability, safety, integration and environment – described in paragraph 2.3)?

Which aims could Highways England do more to meet and how?

Historic England is pleased to note that the need to make a positive contribution to the environment has been identified as one of the Government's key aims for RIS 2, which is in line with its view of sustainable development as set out in the *National Planning Policy Framework*, which includes the need to protect and enhance the natural, built and historic environment.

However, it appears as though the historic environment has not been given equal weight to the natural environment in the delivery of RIS 1. This can be seen by the lack of ambition in Highways England's *Draft Cultural Heritage Action Plan* when compared with the *Biodiversity Action Plan*, the incomplete nature of the *Cultural Heritage Action Plans* and problems in delivering the cultural heritage element of the designated funds. As a result Highways England is not meeting all the requirements of the *Protocol for the Care of the Government Historic Estate*.

Question 8

Do you think there should be any change in the roads included in the SRN (described in paragraph 1.3)?

If so, which roads would you propose are added to or removed from the SRN, and why?

It is again worth highlighting the historic significance of much of the SRN and its associated heritage assets, and the need to take this into account in developing the RIS 1 and RIS 2 proposals. Some heritage assets will be designated, whilst many others are of local interest, and impacts may be direct, indirect or cumulative. All impacts on the historic environment will need to be carefully assessed using appropriate expertise/techniques and avoid harm wherever possible, whilst looking for enhancement opportunities, including conservation and repair.

The proposals for the creation of a major road network are touched on elsewhere in this response and we will be responding separately to this consultation.

Question 9

Is there anything else we need to consider when making decisions about investment in the SRN?

If so, what other factors do you want considered? Please provide links to any published information that you consider relevant.

Early and meaningful involvement on a continuous basis with the Statutory Environmental Bodies (including Historic England) and relevant local authorities (together with their specialist environmental staff) is vital in the development of RIS 1 and RIS 2 schemes/options in order to de-risk projects, avoid unnecessary delay and maximise

enhancement opportunities. Unfortunately, this is not always the case and there have been occasions when we have been consulted at a very late stage with designs relatively fixed, creating needless and avoidable difficulties for all parties.

To help facilitate this process, the Statutory Environmental Bodies have been working with Highways England to help them prepare good practice guidance on *Consulting the Statutory Environmental Bodies on Proposed Highways England Major Projects*. However, it is not always clear whether their project teams are aware of the guidance and the need to adhere to its advice.

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7 February 2018