

Response ID ANON-UWRA-6KVE-U

Submitted to **Consultation on the draft National Policy Statement for Water Resources Infrastructure**
Submitted on **2019-01-31 17:19:27**

Introduction

Section 1: The draft NPS

1 Do you think the draft NPS sets out a clear need for nationally significant water resources infrastructure? Please provide reasons to support your answer.

Q1:
N/A

2 Do you think the draft NPS makes clear for water undertakers, the Examining Authority and the Secretary of State, the relationship between water resources management planning and applying for nationally significant infrastructure project development consent? Please provide reasons to support your answer.

Q2:
N/A

3 Are the assessment criteria included in the draft NPS appropriate? Please tell us your views, including any further relevant criteria you can identify.

Q3:
The criteria (for example as set out in 3.2.2 of the draft NPS) are broadly acceptable. However, in section 3.5, as well as National Parks etc, it is worth remembering other large areas of sensitivity such as World Heritage Sites, Registered Parks and Gardens, and Registered Battlefields.

4 Does the draft NPS comprehensively cover the impacts of water resources infrastructure development and the effectiveness (including avoiding the creation of excessive costs or other potential barriers to the development) of associated mitigation measures? Please tell us your views, including any further impacts or mitigation measures you think should be included.

Q4:
Our response here also refers back to our response of 22.12.2017 where we set out our concerns and examples of impacts:

<https://historicengland.org.uk/content/docs/consultations/he-response-to-defra-statement-water-resources-nov17-pdf/>

We broadly agree with Section 4.7. However, Table 7 might give more emphasis to the avoidance of significant heritage assets altogether, in line with section 4.7.16.

Section 4.7.8 should include consultation with the National Heritage List for England as well as Historic Environment Records to ensure all designated sites are picked up.

Sections 4.7.22-4.7.25 have some errors/ poor wording in them in relation to World Heritage Sites. Not everything within the boundary of a World Heritage Site is of Outstanding Universal Value, but the loss of an attribute of OUV (for example a particular building) could never be "less than substantial harm". These paragraphs appear to conflate WHSs and Conservation Areas, and they should be separated. It is not clear why Conservation Areas and WHSs are singled out for treatment when there are other heritage assets such as Registered Parks and Gardens and Registered Battlefields which also cover large areas. The following document may be helpful:

<https://historicengland.org.uk/images-books/publications/protection-management-of-world-heritage-sites-in-england/>

With regard to mitigation, please also see our response to Question 8 below.

5 Do you have any other comments on the draft NPS which are not covered by the previous questions?

Q5:
N/A

Section 2: Appraisal of Sustainability (AoS) and Habitats Regulations Assessment

6 Do you agree with the findings (of 'likely significant effects') of the Appraisal of Sustainability Report? If not, what other significant effects do you think have been missed, and why? Please provide reasons to support your answer.

Q6:
We note that the AoS Objectives (Table 1, section 13) does not use the wording we recommended in our last response in 2017, and because of that, it is unclear how our wider definition is taken into account.

7 Do you agree with the conclusions of the Appraisal of Sustainability Report and the recommendations for enhancing positive effects associated with the implementation of the draft NPS? If not, what do you think should be the key recommendations and why?

Q7:

Broadly agree, and although see 6 above and 8 below.

8 Do you agree with the proposed arrangements for monitoring the significant effects of the implementation of the draft NPS? If not, what measures do you propose?

Q8:

Disagree. There are no measures proposed for monitoring impact on the Historic Environment (eg Table 6.1), nor on Landscape or Townscape. Given that there could be "significant sustainability effects", cultural heritage needs to be monitored. There are Cultural Heritage AoS objectives set out in Table 1, so it should be possible to match those objectives to monitoring indicators. (NB We would prefer the wider definition of cultural heritage set out in our earlier consultation).

Such indicators might include: numbers of designated and undesignated sites affected both positively and negatively, and looking at how many sites can be taken off the Heritage at Risk Register:

<https://historicengland.org.uk/advice/heritage-at-risk/>

We would be happy to advise further on all of this.

9 Please tell us your views on the findings from the Habitats Regulations Assessment Report for the draft NPS, providing reasons to support your answer.

Q9:

N/A

Survey information

10 What is your name?

Name:

Dr Amanda Chadburn

11 What is your email address?

Email:

amanda.chadburn@historicengland.org.uk

12 What is your organisation?

Organisation:

Historic England

13 Would you like your response to be confidential? If yes, please explain why in the box below

No

If yes:

Consultee Feedback on the Online Survey

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

Neither satisfied nor dissatisfied

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

Q15:

It would be helpful to be able to print out and check a draft response before hitting the submit button.