



ENGLISH HERITAGE

Response to the consultation on the National Policy Statement for Waste Water

The role of English Heritage

English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with our funding agreement signed by CLG and DEFRA. We work in partnership with central government departments, local authorities, voluntary bodies and the private sector to conserve and enhance the historic environment, broaden public access to our cultural heritage, and increase people's understanding and appreciation of the past.

We are the UK Government's statutory adviser and a statutory consultee on all aspects of the historic environment and its heritage assets. This includes archaeology on land and under water, historic buildings sites and areas, designated landscapes and the historic elements of the wider landscape.

Question 6.2. Do you think the draft Waste Water NPS adequately sets out for the Infrastructure Planning Commission the key assessment principles to inform the assessment of future waste water development applications?

English Heritage has been involved in discussions with government (including DCMS, CLG, DECC and DEFRA) relating to the developing a generic text which adequately captures the protection required for the historic environment within National Policy Statements (NPSs). A form of words has been agreed and a version was sent by the DCMS to colleagues in CLG, DECC and DEFRA on 7 February 2011. We believe that this will now be used as the basis of all historic environment sections within each NPS. Therefore, we expect it to replace section 6.10 in the draft waste water NPS.

As that text is generic it will require minor additions to fit within the waste water NPS. In our role as statutory advisor of government for the historic environment we would hope to be involved in that process

Question 6.8. Do you think the two schemes outlined by the draft Waste Water National Policy Statement capture the level of need for nationally significant infrastructure in the area? If not what further schemes should be included?

Deepham Sewerage Works

There needs to be greater clarity on the sites being considered for redevelopment as part of this NPS. Paragraph 3.1.4 admits that the precise

location of the site has not yet been confirmed, but also advises that the developer is considering locations adjacent to the existing works. Clarification of this would be useful as there may be non-designated heritage assets which should be identified and assessed as apart of the development process. This could include archaeological deposits, of which some have already been found within the area.

Thames Tunnel

We welcome the sentiments expressed in para 4.1.7 (the last sentence) that the Government wishes to ensure that the planning process goes smoothly as possible and to ensure that there are no significant delays in addressing problems caused by the sewage overflows, and that there is transparency and all interested points of views are heard and considered properly. However in our response to the recent consultation we stated the following:

- General support for the preferred Abbey Mill's route as advocated by Thames Water, because based on the evidence provided it appeared to cause less harm to the historic environment than the alternative routes.
- A need for the tunnel and associated infrastructure to be sensitively integrated into the historic environment. To achieve this it is vital that Thames Water has a full and informed understanding of the significance of the historic environment at an early stage of the design and development process, in order to ensure that every reasonable opportunity has been taken to avoid harm where possible, and mitigate harm where it is not possible to avoid it.
- Even after early discussions regarding the selection of locations for construction, the potential for substantial harm still exists. The detailed consideration of both locations and individual sites within the locations should demonstrate that the potential harm to the historic environment has been considered. Where individual sites have been proposed at locations of great heritage significance that cause harm, we have advised Thames Water that they need to demonstrate explicitly why there is no acceptable alternative option.

The appraisal element of the NPS (para 4.1.11-4.1.15) appears not to recognise the need to assess the impact of the Thames Tunnel upon the cultural heritage of the sites/locations where the infrastructure will be introduced. This requires correction.

Other comments:

Within the consultation document Annex 6 lists those organisations consulted under regulation made under the Planning Act 2008. Whilst English Heritage is not referenced under The Infrastructure Planning (National Policy Statement Consultation) Regulations 2009, Clause 3(3)(a), we are referenced in Table 1, to be consulted when:

Where the NPS is likely to affect historic buildings or the historic environment

Given that all NPSs will affect the historic environment (and the Waste Water NPS accepts this by including section 6.10), we are surprised that we have not been afforded the same level of consultation as those referenced in Annex 6. We would hope that this approach changes for later iterations.

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