



Historic England

## **Historic England Response to the ORR Consultation on Monitoring Highways England's Network Investment (July 2016)**

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 already engaging with Highways England at a number of levels as part of the delivery of the current Roads Investment Strategy. This includes commenting on proposals for road schemes, especially those being delivered through the Nationally Significant Infrastructure Planning process, where we are a statutory consultee. Historic England is also a member of the Environmental Designated Funds Advisory Group, we sit on the Design Panel and are involved in the six strategic studies.

Having reviewed the consultation document, we offer the following comments to the Office of Rail and Road to help in monitoring Highway's England's network investment. The information Highways England holds on the heritage assets in its ownership or in close proximity to the network is incomplete, which could create potential difficulties when developing and implementing future plans, programmes and projects, due to the lack of a robust and comprehensive evidence base. Such information is vitally important, especially at the initial project planning stages of road schemes, to consider options for avoiding potentially damaging impacts, whilst also highlighting enhancement opportunities.

As a result of this, we believe that Highways England is not able to meet the requirements set out in the *Protocol for the Care of the Government Historic Estate* which has been developed by Historic England and government (<https://historicengland.org.uk/images-books/publications/protocol-for-the-care-of-the-government-historic-estate/>).

The Protocol sets out good practice for the management of heritage assets in public ownership and includes, amongst other things, nomination of a heritage officer, to ensure the significance of any heritage asset is taken into account when planning change; commissioning of regular condition surveys; implementation of a planned programme of repairs and maintenance; ensuring that the design quality of any new work enhances the historic environment; and the preparation of biennial conservation reports.

In its *Delivery Plan 2015 – 2020* (2015), Highways England recognised the need to address this issue and Paragraph 6.1.7 contains the following statement:

'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*'.

However, Historic England is concerned over the lack of progress on this. A future programme of interventions along with associated costs does not appear to have been produced.

The need for Highways England to improve transparency about its plans and performance, including the transparency of its plans and strategies in the areas of safety and the environment has been recognised by the Office of Rail and Road in its *Annual Assessment of Highways England's Performance April 2015 – March 2016*. It is also understood an updated version of Highways England's Environment Strategy is being prepared, together with action plans for specific areas and new performance indicators.

At present, the only key performance indicators (KPIs) for the environment relate to noise and biodiversity, and we very much hope the KPIs can be developed further to consider other areas such as the historic environment. We encourage Highways England to look at measures of improving stakeholder engagement for its programmes, plans and projects, which can sometimes appear very late in the day with limited follow-on communication or action.

We also believe that Highways England would benefit from having its own in-house expertise and Historic England is able to provide a range of paid services that could help address some of these concerns. Some bodies, such as the Ministry of Defence, are further ahead in managing their heritage assets and we would be happy to support Highways England in developing its approach. This would also have the potential to reduce costs and possible delays in delivering the Roads Investment Strategy where future decisions may affect the historic environment.

Historic England would, of course, be willing to discuss this response in more detail with the Office of Rail and Road.

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