

TfN Draft Transport Plan Consultation,
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05 April 2018

Dear Sir or Madam,

Transport for the North Draft Strategic Transport Plan

Thank you for consulting Historic England about the Draft Strategic Transport Plan for the North.

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.

The area covered by the Plan includes an extensive and diverse range of heritage assets, including those of international and national significance. Therefore, we welcome the acknowledgement made throughout the document of the importance of the area's environment not simply to the tourism economy, but also for the contribution it makes to the quality of life (a key element in attracting and retaining skilled workers and inward investment) and to local distinctiveness and to the recognition of the challenge of ensuring that transport networks do not produce unacceptable environmental impacts.

General

Historic England recognises that good transport links are one of the key elements to the social and economic wellbeing of the North, and the fundamental role which they play in supporting the economic growth of this part of the Country. We also accept that the transport infrastructure of this part of the country needs to adapt and develop in the face of new technology and needs.

However, whilst we fully realise that improvements to the transport infrastructure can have both direct and indirect benefits for the historic environment (though for example, reducing congestion and pollution in historic towns or by helping to provide a more robust economy which can better-sustain the area's heritage assets), they can, at times, also harm elements which contribute to the significance of an area's historic environment (the development of new transport infrastructure, for example, can affect historic landscapes and may cause direct damage to heritage assets and their setting). In many cases, however, there is scope for mitigation of impacts once safety requirements and engineering limitations have been factored in, together with possible enhancement opportunities.

It must also be remembered that many elements of the North's existing transport infrastructure are also important historic assets in their own right. These range from prehistoric trackways and Roman roads, to medieval bridges, the development of canals and railways during the industrial revolution and the introduction of motor transport and aviation in the 20th century. Whilst some of these transport-related heritage assets will be designated as listed buildings or scheduled monuments or lie within conservation areas, however, the vast majority are likely to be undesignated.

Whilst it is accepted that, at this stage, this is a high-level document, as the strategy develops and as the various proposals in each of the Strategic Development Corridors become more refined, it is important, to ensure that Strategy properly assesses all potential impacts on the historic environment to an appropriate level of detail. Historic England would welcome the opportunity to support this through early engagement in this process, and detailed advice and assistance.

Historic England considers that, following the approach set out in the National Planning Policy Framework and National Policy Statement for National Networks, it will be helpful if any appraisals adopt a broad definition of the historic environment, including conservation areas, locally designated sites or buildings, and historic landscapes and townscapes, as well as designated heritage assets. There are still significant gaps in our understanding of the historic environment. The use of early assessment and, where necessary, field evaluation, can minimise the risk of encountering unexpected remains during construction. This information can also inform the design of transport schemes and any strategies to mitigate impact on and consider enhancements to the historic environment.

Detailed comments

At this stage, and given the very strategic nature of the document, we have few comments to make on the contents of the draft strategic Transport Plan other than the following:-

- Page 8 - We welcome the numerous references throughout the document to the commitment to develop an integrated and resilient transport network that supports modal shift and more sustainable travel options. However, the document then appears to focus on road and rail options, including stating in the second paragraph on page 8 that ‘users of the road and rail network are at the heart of the Strategic Transport Plan.’ While other modes of transport (airports, ports, inland waterways etc) are mentioned in passing within the document, there is little detail on how these feature within the investment programme. It would be helpful for some clarification on the scope of the document, and if and how alternative modes of transport will be integrated with this strategy.
- Page 11, first column, second Paragraph – The appraisal methods of transport interventions also need to properly reflect and consider the environmental and social context within which these interventions might take place.
- Page 11, second column, second Paragraph – The Strategic Transport Plan should also include reference which acknowledges the importance of the North’s environmental assets. It is suggested that this sentence is amended to read:-
“The strategic Transport Plan will work towards a sustainable transport network that will improve the health and wellbeing of residents and visitors to the North whilst safeguarding its environmental assets and distinctive landscapes (including the natural, built and historic environment)”
- Page 12, Vision – The Vision ought to include reference to delivering the necessary transport connections in a manner which safeguards those elements which make the North of England such a distinctive place. It is suggested that it is amended to read:-
“... drive economic growth, support an excellent quality of life, and safeguard those elements which contribute to the area’s distinctive identity”
- Page 12, Increase Efficiency text box – The final bullet should also refer to the need to reduce emissions which contribute to climate change. While it is recognised that this is particularly difficult for the transport sector, the Strategy should support wider efforts to reduce emissions, in line with the Government’s commitments.
- Page 13, final box – whilst we wholeheartedly support this Objective, it would be preferable if it used the same terminology as the NPPF:-
 - Firstly, in terms of the environmental role of sustainable development, national policy guidance refers to *“natural, built and historic environment”*. (This also needs to be reflected in a number of other places throughout the strategy).
 - Secondly, national policy guidance refers to ‘conserving’ the historic and natural environment (as opposed to ‘preserving’).
- Page 16 – whilst we welcome recognition of the 6 UNESCO World Heritage Sites and the strong visitor and tourism offer they provide (page 75), it is important to also recognise the value of the historic environment as a whole across the region.

- Page 90, TfN's Principles – As we have noted above, improvements to the transport infrastructure can have both direct and indirect impacts upon the historic environment. The principles cited within this section refer to the importance of the natural environment and designated sites, but do not mention the historic environment. We would wish to see similar reference to the extent and diversity of heritage assets covered by the Plan area, and would welcome the opportunity to work closely with the TfN to avoid and/or minimise any adverse impacts, and seek opportunities to enhance the historic environment where possible.

As we have stated above, as the more detailed work on each of the Strategic Corridors develops, we would welcome the opportunity to engage with you further and, if you consider a meeting with any of our three Regional Teams would be beneficial, please do not hesitate to contact me.

Yours faithfully,

Ian Smith

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