



Historic England

Nuclear Decommission Authority *Draft Strategy for Consultation* (August 2020)

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 have previously commented on the Nuclear Decommissioning Authority's (NDA) *Draft Business Plan 2019-2022* (31 January 2019), *Draft Business Plan 2018-2021* (22 January 2018), *Draft Business Plan 2017-2020* (03 February 2017) and *Draft Strategy* (09 February 2016).

Within these responses, the national and international significance of Britain's nuclear industry and the pioneering role that British scientists and engineers played in the development of this technology was highlighted. To mitigate against the physical loss, through the decommissioning and remediation of nuclear power stations and related research and production facilities as set out in these documents, for England Historic England highlighted the need for the NDA to put in place a corporate heritage strategy and strategies for individual sites to ensure they are recorded to a proportionate and adequate level.

As a non-departmental public body sponsored by the Department for Business, Energy and Industrial Strategy, the NDA should aim to meet the requirements of the *Protocol for the Care of the Government Historic Estate*, which has been developed by Government and Historic England, and is mandatory for Government departments and its agencies - <https://historicengland.org.uk/images-books/publications/protocol-for-the-care-of-the-government-historic-estate/>. By developing a heritage strategy as part of its Business Plan, the NDA will be able to demonstrate it is meeting these commitments, especially with regard to points three and eleven.

We therefore very much welcome the on-going discussions that are taking place between the NDA (including NDA Archives Limited), Historic England, Historic Environment Scotland, Cadw, Royal Commission on the Ancient and Historical Monuments of Wales, The National Archives, Museums, Archives, Libraries Division, Welsh Government, and The Science Museum Group in developing and implementing the NDA's heritage strategy. This involves the recording of sites, selective retention of archives both at 'Nucleus' (the Nuclear &

Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH
Telephone 01793 44 5050 Facsimile 01793 41 4707

Please note that Historic England operates an access to information policy.
Correspondence or information which you may send us may therefore become publicly available



Caithness Archive), together with other suitable national and local locations, and the safeguarding of selective artefacts with The Science Museum Group and at other appropriate repositories.

Historic England looks forward to continuing this work with the NDA in helping meet these requirements as part of its future strategy and at possible options for disseminating this information within the nuclear industry, those local communities where sites are located, academic researchers and the wider public as part of its historical legacy and story in order to maximise public benefit. Such an approach would help the NDA in responding to Q 18 'We are developing our group-wide digital version; in your opinion, how ambitious should this be?' and Q 20 'How can we involve more people in our work and better co-ordinate our engagement activities?'

Further Comments on Submitted Documents:

Having reviewed the other documents included as part of this consultation and the following statement in the *NDA (2020) Draft Strategy*:

'We do not anticipate the preservation of our facilities for the benefit of national industrial heritage. However, the preservation of facilities for this purpose will be subject to case-specific assessment in line with planning policy. Whilst we do not intend to preserve physical evidence of the nuclear industry, one of the objectives of the NDA's Archive is to preserve its history' (*Draft Strategy*, p 38).'

We feel these reports would benefit from saying more about the steps the NDA is taking to preserve its history as described in our comments above. This could then be threaded throughout the *Integrated Impact Assessment Reports*, together with a consideration/mitigation on the potential impacts on non-designated heritage assets, which at present is largely absent.

- *NDA Strategy (2021) Integrated Impact Assessment Report Vol 1: Main Report Final Draft*

Under section 7.1.5, page 29 ('cultural heritage'), there is rightly no distinction between designated and non-designated heritage assets, which aligns with the definition of the historic environment as set out in the Government's National Planning Policy Framework (Ministry of Housing, Communities & Local Government 2019). We also suggest some buildings/structures on NDA sites are valued for their technological and scientific significance as-well-as their 'iconic design or appearance'.

- *NDA Strategy (2021) Integrated Impact Assessment Report Vol 2: Detailed Options Assessment Final*

We therefore find it surprising that where cultural heritage is considered in this report the focus is purely on potential impacts on designated heritage assets with no consideration of direct/indirect impacts on non-designated heritage assets either outside or within the site boundary, including the legacy of the nuclear industry. In

Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH
Telephone 01793 44 5050 Facsimile 01793 41 4707

Please note that Historic England operates an access to information policy.
Correspondence or information which you may send us may therefore become publicly available



the absence of such information, the possible impacts on cultural heritage appear to be being down-played.

- *NDA Strategy (2021) Integrated Impact Assessment Report Vol 3: Baseline Report and Policy and Legislation Context Review Final*
 - A similar comment applies to 3.0 Site Specific Baseline / Community Profiles – Cultural Heritage where the focus is almost entirely on nationally designated heritage assets with no consideration of non-designated heritage assets.
 - 4.0 Future Baseline - The above points could be further explored in 4.3.5 Cultural Heritage which at present mostly describes the role of key UK heritage agencies and 4.4.4 (Environmental Baseline Conditions), which again focuses purely on designated heritage assets.
 - Policy and Legislative Context Review 2.7 Cultural Heritage requires redrafting to contain relevant UK legislation and policy, which is currently absent.

- *NDA (2020) Near-Surface Disposal Strategic Position Paper*
 - We advise the reference to 'local heritage' under 'location' (page nine) is changed to 'historic environment'.

Shane Gould
Head of Industrial Heritage Strategy
30 October 2020



Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH
Telephone 01793 44 5050 Facsimile 01793 41 4707

Please note that Historic England operates an access to information policy.
Correspondence or information which you may send us may therefore become publicly available

