

## Nuclear Decommission Authority *Draft Business Plan 01 April 2019 to 31 March 2022* (December 2018)

## **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 previously commented on the Nuclear Decommissioning Authority's (NDA) *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 facilities as set out in these documents, 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. The heritage strategy adopted at the former research site at Dounreay, Caithness, is a useful model that could be applied across the whole estate — http://www.dounreay.com/about-us/heritage.

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 - <a href="https://content.historicengland.org.uk/images-books/publications/protocol-for-the-care-of-the-government-historic-estate/protocol-for-care-of-govt-historic-estate-2017.pdf/">https://content.historicengland.org.uk/images-books/publications/protocol-for-the-care-of-the-government-historic-estate/protocol-for-care-of-govt-historic-estate-2017.pdf/</a>. 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. Furthermore, the need to understand the likely significant effects of a project on the cultural heritage is identified in the *Draft Environmental Impact Assessment: Nuclear Decommissioning Regulations* issued for consultation by the Department of Business, Energy and Industrial Strategy in May last year.

We welcome the initial discussions that have already taken place between Historic England and the NDA to address these issues and are keen to explore this further, to better understand how the NDA is developing its heritage strategy as part of the Business Plan. The close involvement of NDA Archives Limited will be important in ensuring the retention of a





representative sample of site plans and architectural drawings, together with operating manuals and site drawings both at 'Nucleus' (the Nuclear & Caithness Archive), together with other national and local repositories. In addition to the collection of documentary records, consideration should be given to the safeguarding of artefacts (architectural and training plant models, inert training aids, sections of control room panels and specialist clothing worn by the workforce) as-well-as capturing oral testimony. We suggest the discussions on the heritage strategy might usefully involve both the Science Museum and The National Archives (who are also sponsored by DCMS), together with representatives from DCMS and Department for Business, Energy and Industrial Strategy, if that would be helpful.

Although the nuclear industry may wish to retain small elements of historic plant or structures for its own purposes, as we have previously stated, the preservation of nuclear heritage sites solely of heritage grounds in England is highly unlikely and their recording, and the creation and maintenance of archives and archival artefacts, is particularly important. Historic England therefore looks forward to continuing to work with the NDA in helping it meet these requirements as part of its 2019-2022 Business Plan.

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