Historic England

Environment Agency Consultation: River Basin Management Plans

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.

As a statutory consultee, we welcome the opportunity to submit a response to this consultation on the draft River Basin Management Plans (RBMPs) for the period 2021-2027.

This response deals primarily with issues at a national level on RBMPs. It is not possible to comment in detail here on each of the individual RBMPs, but we will highlight common themes (or inconsistencies) in those Plans.

This response also identifies areas of current research activity for Historic England that may be of interest to the Environment Agency as the RBMPs programmes of measures are further developed and delivered.

We would welcome the opportunity to work together to support greater recognition of the historic environment in river basin management planning, in terms of the impact but also the potential opportunities it affords in delivering benefits for communities.

The historic environment plays an important role in place-shaping, local and cultural identity, and the resilience of places and people. Whilst heritage assets and the historic environment are affected by water quality, and by River Basin Management responses, the historic environment can also play a practical role in helping to manage water quality; for instance, through learning from traditional approaches to water management, living with water and responding to changes in the water environment through climate change. The historic environment can also support community engagement with river basin management.

The positive role the historic environment, and cultural heritage more generally, can play in responding to the challenges of climate change has been recognised by the IPCC[1], the G20 and the UN Race to Resilience[2]. Historic England's work to explore

[1] Hoesung Lee, IPCC Chair 6th December opening remarks for ICOMOS/IPCC/UNESCO International Co-Sponsored Meeting On Culture, Heritage and Climate Change https://www.ipcc.ch/event/ipcc-icomos-unesco-co-sponsored-meeting-on-culture-heritage-and-climate-science/

[2] The Climate Heritage Network, of which Historic England is a founding steering committee member, is an official partner in the Race to Resilience and will be demonstrating how cultural heritage can improve the climate resilience of people around the world: https://racetozero.unfccc.int/race-to-resilience-launches/

the relevance of the historic environment to natural flood management is included within the current UK National Adaptation Programme[3].

The historic environment encompasses all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. It includes both designated and non-designated heritage assets.

Designation highlights a building, site or area's special interest and value to this and future generations and gives it protection under legislation and policy. The National Heritage List for England is an online searchable database of designated heritage assets (excluding Conservation Areas): Listed Buildings, Scheduled Monuments, World Heritage Sites, Registered Parks and Gardens, Registered Battlefields and Protected Wreck Sites. Non-designated heritage assets may be locally important, adding to local identity and sense of place.

Riverine, estuarine and coastal environments are particularly rich in industrial archaeology, either directly related to water management (weirs, leats, sluices, reservoirs, etc.) and transportation (harbours, canals, etc.), as well as manufacturing and power generation (mills, water wheels, etc.). Many such features are designated heritage assets or locally recognised features of historic interest.

However, the historic environment encompasses more than just individual assets and contributes to urban and landscape character, and it is important that the RBMPs recognise and seek to protect that sense of place.

We are keen that protection of the historic environment is fully integrated into the latest iterations of RBMPs and welcome the opportunity to engage with you at a regional level on the details of the individual programmes of measures as they are further developed.

1. **What are your views of these principles? When thinking about your answer, you may wish to consider how easy (or hard) you would find adopting the principles.**

Historic England supports the majority of the principles set out in the draft RBMPs. These principles align well with Historic England's activity in these areas, in particular the urgent need to address the impacts of climate change which has the potential to have a profound effect on the environment. Please see Historic England's *Heritage and Climate Change* (2022), which describes our position on the climate crisis.

Despite this however, we are disappointed that there is currently no direct reference to the historic environment in any of the principles. In our view this is a serious omission given the important relationship between the water environment and the historic environment.

To provide background, very few of our watercourses follow entirely 'natural courses,' and have been shaped by human interaction with water over millennia. People have sought to manage water since prehistoric times and large-scale water management

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf

can be seen from at least Medieval times, and earlier in some places. This history still influences our watercourses today and the physical remains of this historic activity are often preserved in the landscape (e.g. historic weirs, bridges) or have resulted in distinctive, historic landscapes (such as water-meadows, flood meadows or the Norfolk Broads) many of which are also important for biodiversity.

The water environment and the historic environment should be viewed holistically. An additional principle should be added to those set out under 2.1 which directly relates to the protection and where appropriate the enhancement of heritage assets within and around the water environment.

More specifically, in respect of the first principle (take a collaborative place-based approach), this aligns well with Historic England's emphasis on the importance of place shaping as set out in our *Future Strategy* (2021), 'thriving places,' being one of our three areas of focus within the Strategy. Historic England can therefore be an important partner to the Environment Agency in fulfilling this objective.

We support the second principle (make evidence led decisions). The Environment Agency should be aware of our *Research Strategy* (2016) which sets out our objectives and themes for research as well as how we will work with partners to carry out joint evidence or seek to influence their independent programmes. The themes #adapt and #understand are relevant to the RBMPs.

Sitting alongside the Research Strategy is our *Research Agenda* (2017), which identifies specific research topics; water management and climate change being relevant to the RBMPs. Under these topics a number of potential research questions both for Historic England and partners to consider are set out, and these questions are intended to help fulfil our research mission in these areas.

The sub-principle under the sixth principle (restoration of the natural environment offers the potential to deliver carbon sequestration as well as other benefits) should be based on an understanding of historic character of places and landscapes which can deliver benefits for cultural heritage as well as the natural environment.

The seventh principle (build catchments resilient to warmer water temperatures, more frequent floods and drought, and rising sea levels) is likely to have mutual benefits for the historic environment and the natural environment. Drought and flooding pose a significant risk to the historic environment particularly to sites of archaeological interest through the wetting and drying process. Therefore, increased resilience to drought should help protect these assets from damage.

2. Do you agree with the environmental objectives and targets in the draft plans?

Comments on the general text

Our comments under this question relate to the national objectives and European targets rather than those concerning individual river basins and catchments.

England's landscapes, waterscapes and habitats have either been created or influenced by millennia of human activity. Nature and the historic environment co-exist in the same places, and together represent bio-cultural heritage. An integrated approach to their conservation and enhancement – recognising this symbiosis and putting their historical origins at the heart of decision-making - is therefore the only truly sustainable route. Indeed, both the World Heritage Convention and the European

Landscape Convention (which are co-owned by Defra and DCMS) see nature and heritage as two sides of the same coin. Any policy (project or delivery mechanism) that does not recognise this reality will lead to poorer economic, environmental and public outcomes.

Recognising this, the 25 Year Environment Plan (2018) helpfully acknowledged that: "Initiatives to protect and improve our natural world and cultural heritage are acts of stewardship by which we discharge our debt to it, and so are moral imperatives in themselves, but they are also economically sensible. In the past, our failure to understand the full value of the benefits offered by the environment and cultural heritage has seen us make poor choices."

Section 4.1 of the Summary of the River Basin Management Plans identifies human activity as being the key driver of the condition of water bodies ranging from high to bad. We find this concerning, whilst accepting that human activity can result in negative consequences for the condition of water bodies, this is not a given and there are many examples of where past activity has been beneficial to the ecological status, indeed some of these modifications have created habitats that our biodiversity is based upon. For instance, floodplain meadows, wood pasture, coastal grazing marsh are all valuable habitat that is the result of human activity.

Cultural processes can be part of the nature-based solutions to support biodiversity and archaeology and can help us to understand those processes and their impact over time. This new information can lead to sustainable solutions to the management of our waterscape for the future (for example see the University of Glasgow's Archaeology Research Project *Wildscape*).

Under Section 3.3, alongside impacts on water environment and the wildlife, changes in river flows can also impact on archaeology and heritage assets.

Comments on the Environmental Objectives (Section 4.2)

The first objective (preventing deterioration of the status of surface waters and groundwater), expanded on in section 4.3, should recognise that alongside the protection of wildlife and people's health and wellbeing, there are also potential benefits for the historic environment; in particular the conservation of features of archaeological interest.

We note in section 4.4 (Protected areas) that no reference is made to protected historic areas which may be designated as heritage assets (including Conservation Areas, Listed Buildings, Scheduled Monuments, World Heritage Sites, Registered Parks and Gardens, Registered Battlefields and Protected Wreck Sites) or designated landscapes (including National Parks and Areas of Outstanding Natural Beauty). These should be included as river basin management and water quality issues can affect these areas as well as those already listed.

The objectives 'aiming to achieve good status for all water bodies;' 'reversing any significant and sustained upward trends in pollutant concentrations in groundwater;' are both reasonable in the context of our interest in the relationship between the water environment and the historic environment as are 'cessation of discharges, emissions and losses of priority hazardous substances into surface waters;' and 'progressively reducing the pollution of groundwater and preventing or limiting the entry of pollutants.'

4. Do you have any comments on the potential new measures set out in the draft plans? Please tell us about any other new measures that could be taken forward with support from partners to achieve the objectives in the plans.

It is not possible to comment here in detail on each of the entries in the summary of measures spreadsheet or the priority measures that will be implemented at catchment level. However, at all levels it is important that consideration of the historic environment is properly integrated into planning new programmes of measures. For example, the Chalkshire project in the Yorkshire Wolds project led by Hull and East Riding Catchment Partnership where the Environment Agency has worked closely with Historic England amongst other partners to discuss how we value, manage and interact with the water, heritage and wildlife within this chalk of largely unrealised significance. Recognition should be given to the positive contribution heritage can make to achieving these measures.

In the next round of RBMPs in 2027 we consider that there should be a clearer role for measures that support cultural heritage. These measures should draw upon historic environment data and historic landscape characterisation for baseline environmental information. Utilising such information will lead to more sustainable decision making, based on an understanding of past human activities on the environment and hydrology. This can then be integrated within models and visioning exercises to project future impacts.

5. Do you have any comments on the challenges and measures suggested as priorities in your local catchment partnership's page?

As previously noted, these comments relate to RBMPs at a national level but would we welcome working with the Environment Agency and partners as projects are drawn up at a local level to ensure the historic environment is fully integrated with the measures suggested.

6. Do you have any further comments on the draft river basin management plans, not covered by the previous questions?

<u>Holistic Approach</u>

It is important that an integrated approach is taken to water management that encompasses all aspects of the environment including natural and cultural heritage. An understanding of the historic environment is essential in understanding why places are the way they are today, and what that might mean for their future sustainable management. Working with the historic environment can also be a powerful tool in engaging people and communities, and by taking a holistic approach mutual benefits for both nature and heritage can be realised.

<u>Impact of measures</u>

Changes to river basin/water management can have intended or unintended consequences for people and the historic environment, such as:

- The construction and operation of new infrastructure and Sustainable Drainage Systems and changes in land management have the potential to impact on the significance of heritage assets and their settings. This includes impacts on water-related or water-dependent heritage assets;

- The abstraction of water resources can impact groundwater flows and chemistry which in turn can impact on the survival of buried, waterlogged archaeological and palaeo-environmental remains of significant interest and fragility;
- The alteration of the physical characteristics of a water body (hydromorphological alterations) comprising the modification/removal of weirs or other in-channel structures may impact the significance of heritage assets, as might other physical changes to rivers such as de-canalisation or re-cutting old meanders. These may potentially destroy or harm archaeological and palaeo-environmental remains;
- The introduction of measures that reduce the vulnerability to and improve the resilience of heritage assets (both designated and non-designated) to flooding;
- The management of river catchments in ways that serve to conserve and enhance heritage assets, this including sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes.

Benefits of heritage to water management

Water management and the historic environment are closely linked and changes to the former can have far-reaching impacts on the latter. Conversely an understanding of historic approaches to water management, at a landscape and local level, can offer vital clues to the functioning of a particular water system over time, which can help inform future water management. For example, the often low-carbon technologies and concepts behind traditional/historic approaches to water management can help inform better and more sustainable approaches to future water management. We would, therefore, recommend that understanding the historic character of a landscape should be a starting point for any holistic approach to water management.

Consultants Fjordr undertook research on behalf of Historic England titled *Historic Watercourses Developing a method for identifying the historic character of watercourses River Stour, Dorset* (2021). This research provides good evidence for developing a methodology for identifying, at a strategic level, the historic character of watercourses.

Engaging communities

Historic England sees great benefits in communicating and engaging with communities around water management and climate resilience. Engaging with local history can often open up conversations with communities who have access to valuable local knowledge.

CLandage (Building Climate Resilience Through Community, Landscapes And Cultural Heritage) is a good example of a community engagement project. More information can be found here. It is expected that the results of this project will be available in 2023 and Historic England would welcome an opportunity to share the results and explore how heritage can help support objectives of the RBMPs.

Conclusion

In summary Historic England considers that the RBMPs could better integrate management of the historic environment with the water environment, the two having an important interlinked relationship. This integration should run thorough the objectives and programmes of measures at all levels.

Heritage assets are by their very nature irreplaceable and any programmes affecting the water environment should recognise the need to conserve these assets in accordance with their significance. Through understanding, and informed adaptation,

the management of river basins can result in mutual benefits for both the water environment and the historic environment.

We hope that these comments are helpful and would welcome the opportunity to discuss how protection of the historic environment can be fully integrated into the RBMPs. Furthermore, we hope to engage with you at a regional level on the details of the individual programmes of measures as they are worked up.

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Relevant HE Guidance and Research

Historic England has produced a number of guidance notes which might be useful to inform RBMPs. We have also undertaken a number of research projects which are relevant to water management and have included links to on-going research of interest.

Published guidance

Water Meadows, 2018

Water Features in Historic Settings, A Guide to Archaeological and Palaeoenvironmental Investigations, 2018

Conserving Historic Water Meadows, 2017

Peatlands and the Historic Environment An Introduction to their Cultural and Heritage Value, 2021

Strategy for Water and Wetland Heritage, 2012

Published research

Historic Watercourses: Developing a method for identifying the historic character of watercourses: River Stour, Dorset, 2021

Historic Watercourses Using Imagery to Support Identification of the Historic Character Watercourse A Case Study on the Dorset Stour Catchment, 2018

Building Climate Resilience Through Community Landscapes and Cultural Heritage, 2021

Heritage Counts, Heritage And The Environment 2020

Ongoing/planned research

Historic Landscape Characterisation, opportunity and sensitivity mapping (commissioned project). Due for completion 2022

Biodiversity of Heritage Assets (commissioned project). Due for completion 2022

Connecting the Culm (heritage) continuation of Historic Watercourse Characterisation work (commissioned project). Due for completion 2022

CLANDAGE project (Building Climate Resilience through Communities, Landscapes and Cultural Heritage project) funded by AHRC as part of the UKRI Climate Resilience Programme (led by University of Liverpool)