



ENGLISH HERITAGE

Water Strategy Programme Manager
Water Branch
Energy, Water and Flood Division
Welsh Government, Crown Buildings
Cathays Park, Cardiff
CF10 3NQ

Our ref: Water Strategy
for Wales
Your ref: -
Telephone 07979 206699
Fax -

17 September 2013

Dear Sir/Madam

re: **Water Strategy for Wales - SEA scoping consultation response from English Heritage**

Thank you for the invitation to comment on the Strategic Environmental Assessment (SEA) Scoping Document for the Water Strategy for Wales.

English Heritage is the Government's lead advisory body for the historic environment in England. In accordance with our remit this response relates specifically to those parts of the study area falling within England, principally Herefordshire and Cheshire. More generally our comments may be of wider interest in support of the assessment process and serve to complement those of Cadw, the Welsh Government's historic environment service.

English Heritage has published updated guidance on Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) and the Historic Environment (2013). The guidance sets out a series of general principles on the consideration of the historic environment in the assessment process. For each stage of the assessment more detailed advice is provided to help ensure that the impact of a proposed plan/strategy on the historic environment is adequately addressed. The guidance is available via the English Heritage website: <http://www.english-heritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>.

Our response on the Scoping Document is structured according to the consultation questions as follows.

Question 1: Do you agree that we are focussed on the key environmental effects?

English Heritage agrees that the historic environment (cultural heritage) is a significant environmental issue relevant to the Strategy and as such should be considered as part of the assessment.

1 WATERHOUSE SQUARE, 138-142 HOLBORN, LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

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



In setting out a range of water policies to deliver integrated water management, the Strategy could have various implications for the historic environment and heritage assets (designated and non-designated). Changes to the management of the water environment that can affect the historic environment include:

- the construction and operation of new infrastructure and Sustainable Drainage Systems and changes in land management, which have the potential to impact on the significance of heritage assets and their settings this including impacts on water-related or water-dependent heritage assets;
- the abstraction of water resources and the impact of changes in groundwater flows and chemistry on 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 which may be significant heritage assets; and other physical changes to rivers such as decanalisation or re-cutting old meanders, which have the potential to destroy or harm archaeological and palaeo-environmental remains;
- the introduction of measures that reduce the vulnerability to and improve the resilience of heritage assets (designated and non-designated) to flooding, including occasional flooding; and
- the management of 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.

In accordance with our guidance on SEA/SA English Heritage recommends that a broad definition of the historic environment is used. This will include areas, buildings, features and landscapes with statutory protection (designated heritage assets), together with those parts of the historic environment which are locally valued and important (non-designated heritage assets) and also the historic character of the landscape, townscape and seascape.

Question 2: Do you agree with the ecosystem services identified as being reliant on the Strategy?

In the proposed framework for ecosystem services the historic environment contributes to the cultural services that ecosystems provide. Although the Scoping Document outlines key aspects of the cultural heritage of Wales (section 5.9), English Heritage recommends that greater prominence is given to the ways in which the historic environment can be directly reliant on the water environment. Certain heritage assets, for example, are of direct relevance to the water environment, such as historic bridges, weirs, watermills, and demonstrate people's efforts over centuries to manage and exploit water resources. Other important heritage assets can be reliant on water-dependent habitats or water-level management regimes such as buried, waterlogged archaeological and palaeo-environmental remains associated with river valleys, floodplains, wetland habitats and water meadows.

Question 3: Do you agree with the ecosystem services potentially impacted on by the Strategy?

The Scoping Document recognises that changes in the management of the water environment can have impacts on the historic environment and heritage assets. English Heritage recommends that all proposed policies are fully assessed as to their potential direct and indirect effects on the significance of designated and non-designated heritage assets, including the contribution made by their setting.

1 WATERHOUSE SQUARE, 138-142 HOLBORN, LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

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



In support of the headline assessment criterion for cultural heritage set out in Table 3, it might be useful to consider the following:

- Will the Strategy involve the construction of new infrastructure with potential to impact on the significance of heritage assets and their settings, including impacts on water-related or water-dependent heritage assets?
- Will the Strategy lead to changes in groundwater levels or chemistry that could alter the hydrological setting of water-dependent heritage assets, including palaeo-environmental deposits?
- Will the Strategy encourage hydromorphological adaptations comprising the modification/removal of weirs or other in-channel structures and physical changes to rivers including de-canalisation or re-cutting old meanders?
- Will the Strategy lead to changes in land use or land management regimes with the potential to impact on heritage assets, including archaeological remains?
- Will the Strategy reduce the number of heritage assets at risk of flooding?
- Will the Strategy conserve and enhance the character and distinctiveness of historic townscapes and landscapes?
- Will the Strategy promote opportunities for improved access, understanding and enjoyment of the historic environment?

Question 4: Is there any other information that we should be taking into account as part of the assessment?

Review of Policies, Plans and Programmes

With regard to the review of policies, plans and programmes (Appendix A), English Heritage acknowledges that the review will concentrate on those most relevant to the Water Strategy. Relevant historic environment considerations, however, should still be fully taken into account for the reasons outlined under Question 1. We recommend the following additions:

- UNESCO World Heritage Convention
- EU Landscape Convention
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Ancient Monuments and Archaeological Areas Act 1979
- National Planning Policy Statement (England)

Baseline

English Heritage coordinates the National Heritage Protection Programme for England. In support of understanding the character and significance of England's historic environment, Activity 4B1 focuses on Historic Water Management Assets. Further information is available via:

<http://www.english-heritage.org.uk/professional/protection/national-heritage-protection-plan/plan/activities/4b1>

Under this activity there are a number of relevant pilot projects in Herefordshire including:

- Assessment of water mill landscapes: This project is a rapid assessment of a selection of water mills, along with their earthworks and associated water supply features on a sample of river reaches in Herefordshire.

1 WATERHOUSE SQUARE, 138-142 HOLBORN, LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

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



- Historic Weirs: The project will provide an assessment of the character, value and significance of historic weirs in Herefordshire. It will review examples of modified historic weirs and identify ways of improving future schemes.

English Heritage is continuing to refine a Wetland Vision Data set, which identifies waterlogged sites of 'exceptional' significance. This data set is not yet in the public domain, but we would be happy to explain the current and planned scope of this information set as it relates to England.

Historic Characterisation studies such as county based historic landscape characterisations (completed for Herefordshire and Cheshire) can help to identify surviving water meadows or areas where such historic land management could be reinstated as part of wider catchment management proposals. Urban historic characterisation studies may be useful in providing up-to-date, mapped data on present day land uses and the character of places as well as their historical development, including the historical extent of river floodplains and associated land uses.

We would be pleased to discuss any of these issues further if that would be helpful.

Yours sincerely



Dr Jen Heathcote
Historic Environment Impacts Analyst
E-mail: jen.heathcote@english-heritage.org.uk

cc Kate Barbour, National Advice & Information

1 WATERHOUSE SQUARE, 138-142 HOLBORN, LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

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



If you require an alternative accessible version of this document (for instance in audio, Braille or large print) please contact our Customer

Services Department:

Telephone: 0870 333 1181

Fax: 01793 414926

Textphone: 0800 015 0516

E-mail: customers@english-heritage.org.uk