



Thames Water Draft Water Resources Management Plan 2024

Statement of Response

Appendix D:

Response to Historic England's representation

August 2023

Introduction

The Historic England representation to the consultation on our draft Water Resources Management Plan (WRMP24) comprised one document, which is a letter. This comprised sections containing overarching and detailed comments as well as comments on our SEA report (dWRMP24 Appendix B).

We have considered all of the points raised by Historic England in relation to the draft Water Resources Management Plan. In this appendix we present a table in which we set out the representations raised in Historic England's letter, along with our consideration of these representations and any changes made to the plan as a result (or if no changes are made, why not).

We have copied the text from the Historic England representation directly.



Overarching comments

HE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>Given the potential for impacts on the historic environment through the management of water resources, we consider that the draft WRMP and its accompanying evidence and assessment documents should include appropriate consideration of any adverse effects. These include:</p>	<p>Thank you for your response. We agree that the plan should include appropriate consideration of any adverse effects, and consider that we have prepared our draft and revised draft plan with appropriate regard to the Water Resources Planning Guideline and applicable legislation as regards adverse impacts on the historic environment.</p> <p>As described below, we have made a number of changes to our plan documentation to make our existing consideration of these matters within our assessments clearer.</p>	<p>Please see below for individual items.</p>



<p>The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding, and the potential harm to (or loss of) significance as a result of changes to water catchment areas;</p>	<p>It is important to note that our plan is created to manage the balance of potable water supply and demand rather than management of surface and ground water in a way that would serve to control or impact flooding. This being said, we have as a matter of course examined the potential of our options to affect flooding risk, and have made our consideration of this aspect with regards to heritage impact clearer within our SEA by including this specifically within Table 3-2 (Issues and Opportunities).</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>
<p>The potential impact of water catchment and abstraction measures on heritage assets and their settings, including impacts on water-related or water-dependent heritage assets;</p>	<p>Thank you for your response. Because of the strategic nature of the WRMP, we consider that this aspect is more appropriately considered within more detailed stages of option design as selected options progress towards planning or commissioning. We have updated our SEA to ensure that our commitment to undertake this work is clear as part of these subsequent option design stages</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>



	<p>should options proceed. It should be noted that we work to a dedicated internal asset standard to protect the historic environment in the course of delivering all capital delivery works (F26A Ecology and Heritage Screening Specification). In addition to the standard planning legislation we also adhere to the Water Industry Code of Conduct for Access and Recreation.</p>	
<p>The potential impacts of changes in groundwater flows and chemistry on preserved organic and paleoenvironmental remains: where ground water levels are lowered as a result of measures to reduce flood risk, this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting/changes in salinity brought about by coastline modification could also be harmful;</p>	<p>Thank you for your response. Because of the strategic nature of the WRMP, we consider that this aspect is more appropriately considered within more detailed stages of option design as selected options progress towards planning or commissioning. We have updated our SEA to ensure that our commitment to undertake this work is clear as part of these subsequent option design stages should options proceed. It should be noted that we work to a dedicated internal asset standard to protect the historic environment in the course of</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>



	<p>delivering all capital delivery works (F26A Ecology and Heritage Screening Specification). In addition to the standard planning legislation we also adhere to the Water Industry Code of Conduct for Access and Recreation.</p>	
<p>The potential impact of hydro-morphological adaptations on heritage assets: this can include the modification/removal of historic in-channel structures, such as weirs/coastal and estuarine features such as historic sea defences; as well as physical changes to rivers/coastline with the potential to impact on archaeological and paleoenvironmental remains;</p>	<p>Thank you for your response. Because of the strategic nature of the WRMP, we consider that this aspect is more appropriately considered within more detailed stages of option design as selected options progress towards planning or commissioning. We have updated our SEA to ensure that our commitment to undertake this work is clear as part of these subsequent option design stages should options proceed. It should be noted that we work to a dedicated internal asset standard to protect the historic environment in the course of delivering all capital delivery works (F26A Ecology and Heritage Screening Specification). In addition to the standard planning legislation we also</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>



	<p>adhere to the Water Industry Code of Conduct for Access and Recreation.</p>	
<p>The potential for unrecorded deeply buried and waterlogged archaeology within the 'natural' floodplain/estuarine/coastal deposit sequence;</p>	<p>Thank you for your response. Because of the strategic nature of the WRMP, we consider that this aspect is more appropriately considered within more detailed stages of option design as selected options progress towards planning or commissioning. We have updated our SEA to ensure that our commitment to undertake this work is clear as part of these subsequent option design stages should options proceed. It should be noted that we work to a dedicated internal asset standard to protect the historic environment in the course of delivering all capital delivery works (F26A Ecology and Heritage Screening Specification). In addition to the standard planning legislation we also adhere to the Water Industry</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>



	Code of Conduct for Access and Recreation.	
The potential implications of flood risk on securing a sustainable use for heritage assets, including their repair and maintenance;	Thank you for your response. While we as a matter of course examine the potential of our options to affect flooding risk, we do not consider that the specific consideration you refer to is relevant to a WRMP.	No changes have been made to our plan as a result of this representation, for reasons set out in our consideration.
The opportunities for conserving and enhancing heritage assets as part of an integrated approach to flood risk management and catchment based initiatives, including sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes;	Thank you for your response. We note your support for an integrated approach to bringing about wider benefits, and we are considering these opportunities as part of developing our options, particularly our strategic resource options which offer many opportunities in this area. We have started to consider this within our Gate 2 submissions for our SROs and will continue this work in subsequent Gates and WRMP29. We have updated our SEA (Appendix B) to make it clear that this aspect will be further	Please see Appendix B (SEA report) for changes made as set out in our consideration.



	<p>considered as part of detailed option design.</p> <p>The WINEP programme also presents us with a fantastic opportunity to accelerate progress in this area. We have proposed the accelerated rollout of our Smarter Water Catchments programme to improve more habitats, faster, under the banner of 'Rethinking Rivers', and are pleased that this proposed programme has received positive feedback from regulators. We are also proposing a regional WINEP investigation as part of WRSE to pilot catchment schemes at a regional level. This will accelerate understanding of which solutions could maximise wider benefit to the environment in different situations and at a landscape scale.</p>	
<p>The opportunity for increasing public awareness and understanding of appropriate responses for heritage assets in dealing with the effects of flooding as well as the design of measures for managing flood risk and improving resilience; and</p>	<p>Thank you for your response. While we as a matter of course examine the potential of our options to affect flooding risk, we do not consider that the specific consideration you refer to is relevant to a WRMP.</p>	<p>No changes have been made to our plan as a result of this representation, for reasons set out in our consideration.</p>



<p>The opportunities for improving access, understanding or enjoyment of the historic environment and heritage assets as part of the design and implementation of water resource management measures.</p>	<p>Thank you for your response. We note your support for an integrated approach to bringing about wider benefits, and we are considering these opportunities as part of developing our options, particularly our strategic resource options which offer many opportunities in this area. We have started to consider this within our Gate 2 submissions for our SROs and will continue this work in subsequent Gates and WRMP29. We have updated our SEA (Appendix B) to make it clear that this aspect will be further considered as part of detailed option design.</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>
<p>Historic England advises Thames Water to consider each of the above to inform an appropriate and positive response to the historic environment within the draft WRMP.</p>	<p>Thank you for your response. We have noted the above.</p>	<p>N/A</p>



<p>For the reasons set out above, we are therefore somewhat concerned by a lack of emphasis on the historic environment within the various sections of the Plan. While we would acknowledge the importance of the natural environment in relation to the Plan’s content and objectives and the consequent focus on it, we consider that there is a risk that potential effects on the historic environment are not appropriately considered. For example, there is no mention of the historic environment within Chapter 2 (‘Environment’) of the Technical Report, including the section on Environmental Ambition and long-term objectives on pages 27-28. Similarly, within Chapter 9 there is no reference to potential heritage benefits that could arise through schemes identified in the Plan in the section dealing with enhancement opportunities. This omission is also repeated in Section 8 of the SEA report. We would therefore suggest that the Plan needs to be strengthened in this respect.</p>	<p>Thank you for your response. We consider that we have prepared our draft and revised draft plan with appropriate regard to the Water Resources Planning Guideline and applicable legislation as regards adverse impacts on the historic environment.</p> <p>We have updated our plan to make our existing consideration of the historic environment within our options appraisal clearer. Within this, we have made it clearer that heritage assets and the historic environment have been given equal weighting to other components of the environment in our assessments. We have done this by updating relevant parts of Section 2 and our SEA report (Appendix B).</p>	<p>Please see Section 2 and Appendix B (SEA report) for changes made as set out in our consideration.</p>
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<p>We note the large number of individual supply-side projects that are identified to be taken forward as part of the Plan. Some of these would appear to be more advanced than others, and indeed Historic England has previously had involvement with some (the South East Strategic Reservoir Option for example). However, the Plan and its supporting documents include very little clear information about the precise location of proposals. This makes it very difficult to consider potential impacts. While in some cases, a spatial expression is impractical or currently unknown, greater clarity about the location of proposals where they are known is required, so that we and indeed all parties can consider the potential impacts of proposed development.</p>	<p>We consider that the level of location information provided for our options within our plan and as part of our assessments is appropriate to the strategic nature of the plan and the planning and development stage of the options under consideration. We also consider that these are sufficient to communicate the outcomes of our environmental assessments as part of reporting our plan.</p> <p>Relevant option location information can be found within our environmental reports (primarily Appendix B (SEA)) and in Appendix R (option dossiers). This information can be found in further detail within our Concept Design Reports and our SEA assessment spreadsheets, both of which were stated as available on request within our draft plan consultation. We have included the SEA sheets as part of the material readily available for our revised draft plan.</p>	<p>We have included our SEA assessment sheets as part of the material readily available for our revised draft plan.</p>
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<p>We note that the SEA report identifies impacts on the historic environment through a number of proposed supply-side options – Henley to SWOX 2.4 for example. It therefore seems inappropriate not to confirm the precise location of this project to all parties who may wish to comment.</p>	<p>Please see above.</p>	<p>Please see above.</p>
<p>Supporting the proposed allocations needs to be heritage impact assessment, at a level of detail proportionate to the proposal and local environment. Paragraph 1.7.3. of the Draft National Policy Statement (NPS) for Water Resources Infrastructure (2018) states that: “Schemes that are included in a final published WRMP will have been assessed to inform suitability and ensure they do not have any unacceptable environmental impacts that cannot be overcome.” Paragraph 2.5.6 in the draft NPS states that “Any option included in a final WRMP will need to consider feasibility and reliability as well as taking account of potential environmental and social impacts”. We have yet to see evidence that would meet the above requirements relating to the historic environment. Historic England has produced guidance on site allocations that may be of use to in relation to the Plan: The Historic Environment and Site Allocations in Local Plans Historic England.</p>	<p>Thank you for your response. We consider that our assessments for both the draft and revised draft plan meet these requirements as regards the historic environment, noting the strategic nature of the WRMP, and have updated our SEA report (Appendix B) to make our consideration of impacts on the historic environment clearer. We have also included our full assessment spreadsheets for each option as an Annex alongside Appendix B to aid in this.</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>



<p>We would also take the opportunity to emphasise that, when laying new pipelines, known archaeological remains and unknown potential for archaeological remains represent both a constraint and consideration to factor into decision-making, informed by liaison with heritage professionals (in such circumstances, archaeological advisers).</p>	<p>Thank you for your response. Our SEA considers the effects of options on potential archaeological remains. We have also included our full assessment spreadsheets for each option as an Annex alongside Appendix B to provide additional detail on effects of options on heritage features.</p> <p>Because of the strategic nature of the WRMP, we consider that this aspect is more appropriately considered within more detailed stages of option design as selected options progress towards planning or commissioning. We have updated our SEA to ensure that our commitment to undertake this work is clear as part of these subsequent option design stages should options proceed. It should be noted that we work to a dedicated internal asset standard to protect the historic environment in the course of delivering all capital delivery works (F26A Ecology and Heritage Screening Specification). In addition to the</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>
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	standard planning legislation we also adhere to the Water Industry Code of Conduct for Access and Recreation.	
We look forward to continued engagement with Thames Water and other organisations as the specific resource management projects come forward for construction and operation.	Thank you, we note your response.	N/A



Detailed comments

HE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>We note the information relating to the Severn to Thames Transfer on page 22 of the nontechnical summary, indicating that this project could potentially use restored sections of the Cotswold Canals. However, in other parts of the Plan (for example Chapter 2 page 48) this option appears to be ruled out. Given the potential for impacts on the historic environment, clarification on this would be helpful.</p>	<p>Thank you for your response. Options to treat and transfer water from the River Severn to the River Thames have been assessed against a range of costs and benefits set out within our Interconnector Options Appraisal. These options were:</p> <ul style="list-style-type: none"> • a direct pipeline option • options using a combination of pipelines and reconstructed canal pounds, and • options that provide a full restoration of the canal network <p>A multi criteria assessment identified a preferred solution that would be technically feasible and deliver best value to water company customers.</p> <p>The conclusions from this assessment were that a water transfer from the River Severn to the River Thames would be best delivered by a direct pipeline. However, these conclusions will need to be validated as the scheme progresses taking account</p>	<p>No changes have been made to our plan as a result of this representation, for reasons set out in our consideration.</p>



	<p>of stakeholder feedback and back-checking of any material issues raised against preferred options and alternatives.</p>	
<p>Clearly, restoration of a section of the Cotswold Canals would potentially offer a significant degree of heritage benefits. Such an approach would also align with the draft NPS, which indicates at 4.7.9 -</p> <p><i>The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:</i></p> <ul style="list-style-type: none"> • <i>Enhancing, through a range of measures such as sensitive design, the significance of heritage assets including its setting;</i> • <i>Considering measures that address those heritage assets that are at risk, or which may become at risk, as a result of the scheme;</i> <p>And at 4.7.24</p> <p><i>The applicant should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance and better reveal their significance.”</i></p> <p>We would therefore be interested in any available further detail on this potential project.</p>	<p>The Interconnector Options Appraisal, which identified a preferred solution of a direct pipeline, considered a range of cost and benefits, including the positive benefit to the historic environment. As set out above, subject to further stakeholder engagement, feedback and back-checking, the conclusions from this assessment at RAPID Gate 2 were that a water transfer from the River Severn to the River Thames would be best delivered by a direct pipeline.</p>	<p>No changes have been made to our plan as a result of this representation, for reasons set out in our consideration.</p>



<p>Chapter 9, para 9.227 – as with our comments on the Severn to Thames Transfer, we would suggest that the potential for heritage benefits/enhancement should be explicitly referenced within this section to reflect the text in the draft NPS and help ensure positive outcomes for the historic environment wherever possible. This comment also applies to the list of enhancement opportunities on page 193 of the SEA report.</p>	<p>We have updated our plan to make our existing consideration of the historic environment within our options appraisal clearer. Within this, we have made it clearer that heritage assets and the historic environment have been given equal weighting to other components of the environment in our assessments, including consideration of opportunities for enhancement and benefits. We have done this by updating relevant parts of Section 2 and our SEA report (Appendix B).</p>	<p>Please see Section 2 and Appendix B (SEA report) for changes made as set out in our consideration.</p>
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Appendix B – Strategic Environmental Assessment Report

HE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>Page 12 – we note that in relation to mitigation measures, the report indicates that pipeline routes have been altered to ‘avoid significant effects on designated sites and heritage assets’. As above, without relevant locational information, it is not possible to understand whether we agree with this statement, but in any event this implies that an unspecified degree of harm to a heritage asset would be acceptable – the NPPF is clear that any harm to the significance of a designated heritage asset should require clear and convincing justification. Greater clarity as to what constitutes ‘significant’ effects is required.</p>	<p>We consider that the level of location information provided for our options and the nature of our assessments within our plan are appropriate to the strategic nature of the plan and the planning and development stage of the options under consideration, including compliance with relevant guidance and legislation. We also consider that these are sufficient to communicate the outcomes of our environmental assessments as part of reporting our plan.</p> <p>Relevant option location information can be found within our environmental reports (primarily Appendix B (SEA)) and in Appendix R (option dossiers). This information can be found in further detail within our Concept Design Reports and our SEA assessment spreadsheets, both of which were stated as available on request within our draft plan consultation. We have included the SEA sheets as part of the material readily available for our revised draft plan.</p>	<p>We have included our SEA assessment sheets as part of the material readily available for our revised draft plan.</p>



	<p>Significance criteria have been included within the SEA report (Appendix B) for our draft and revised draft plan.</p> <p>Because of the strategic nature of the WRMP, we consider that this aspect is more appropriately considered within more detailed stages of option design as selected options progress towards planning or commissioning, as part of an Environmental Impact Assessment.</p>	
<p>Monitoring: we note that the two lists of monitoring options on pages 13 and 197 are not the same. Clarification as to precisely what is being proposed in this respect is required.</p>	<p>Thank you for your response. Within our rdWRMP24 SEA report we have provided clarification on this point.</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>
<p>Page 13 – this list includes a proposed indicator of “Number of historic assets damaged or enhanced by WRMP option”. We suggest aligning with NPPF terminology of heritage assets and harm [to heritage significance] and. Also this indicator misses out the opportunity to ‘conserve’ heritage assets (which is neither harm nor enhancement). Clarity is needed whether this is intended to refer to designated heritage assets only or designated and nondesignated heritage assets. We advise the latter, particularly given the potential for effects on archaeological remains, only a small proportion of which are designated. Input is needed from a heritage professional, including liaison with the local</p>	<p>Thank you for your response. As per your response, we have updated reference to historic assets to refer to heritage assets within our plan documents.</p> <p>The terminology of Impacts and significant effects still apply as per the NPPF and this has been used for the SEA of our draft and revised draft plan. The assessment of harm will be progressed through future option development and environmental assessment or EIA work as relevant to the option under consideration.</p>	<p>Please see Section 2 and Appendix B (SEA report) for changes made as set out in our consideration.</p>



<p>authority historic environment services, as appropriate.</p>		
<p>Page 197 – it is unclear what the first and third proposed indicators on this list are intended to measure. We assume that it is being suggested that the number of heritage assets with an ‘improving’ condition should be recorded. However, there are many factors and issues that could affect heritage significance, while the proposed indicators do not appear to have a direct relationship with the WRMP itself. We would suggest that these revisiting if indeed they are to be used.</p>	<p>As per your response, we have reviewed the heritage indicators included in the monitoring content within our SEA report and linked these to WRMP and option effects.</p>	<p>Please see Appendix B (SEA report) for changes made as set out in our consideration.</p>
<p>The SEA objective relating to the historic environment refers to ‘historic’ assets, rather than heritage assets as per the NPPF and should be revised. Also, note archaeology is the study of archaeological remains, rather than the remains themselves. As a result, we suggest rewording the objective as follows: <i>“To conserve, protect and enhance the historic environment and heritage assets, including archaeological remains”.</i> While the above objective includes consideration of both designated and non-designated heritage assets</p>	<p>Thank you for your response. As per your response, we have updated reference to historic assets to refer to heritage assets within our plan documents.</p> <p>As per your response, within our SEA report we have updated the objective referred to as you have suggested.</p> <p>At the strategic level and given the size and number of LPAs within the Thames area consultation with the LPA advisors and review of HER has not been undertaken at</p>	<p>Please see Section 2 and Appendix B (SEA report) for changes made as set out in our consideration.</p>



<p>(NDHAs), the baseline information on page 335 does not cover NDHAs. Similarly, one of the assessment questions relates to Heritage at Risk, which is also not covered in the baseline information. Liaison with Historic Environment Records (HERs) is therefore necessary to expand this section, while further information on Heritage at Risk can be found at Search the Heritage at Risk Register Historic England.</p>	<p>the WRMP stage, which we consider is appropriate to the strategic nature of the plan. Consultation with the LPA advisors and review of HER has been included as a clear next step as part of detailed option design, within our SEA report (Appendix B).</p>	
<p>I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</p>	<p>Thank you for your response, it is noted.</p>	<p>N/A – no changes requested in this comment</p>

