

Lee Stevens
Flood Risk Manager
Thurrock Council

Our ref: HD/P 6042
Your ref:
Telephone 01223 582775

By email only

20 April 2015

Dear Mr Stevens

Thurrock Local Flood Risk Management Strategy (LFRMS)
• **Strategic Environmental Assessment Scoping Report**

Thank you for your letter dated 19 March consulting Historic England (formerly English Heritage) on the above report. We would like to make the following comments:

General comments

Historic England recommends that our guidance (2013) on Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) and the Historic Environment is used to inform the environmental assessment. The guidance is available via the Historic England website: <http://historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/>. 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.

Historic England welcomes the opportunity to engage in the assessment and preparation of the strategy for the following reasons:

- The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding, and the potential harm to or loss of their significance.
- The potential impact of flood risk management measures on heritage assets and their settings, including impacts on water-related or water-dependent heritage assets.
- The potential impact of changes in groundwater flows and chemistry on preserved organic and palaeo-environmental remains. Where groundwater 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 could also be harmful.

- The potential impact on heritage assets of hydromorphological adaptations. This can include the modification/removal of historic in-channel structures, such as weirs, as well as physical changes to rivers with the potential to impact on archaeological and palaeo-environmental remains.
- The potential implications of flood risk on securing a sustainable use for heritage assets, including their repair and maintenance.
- The opportunities for conserving and enhancing heritage assets as part of an integrated approach to flood risk management and catchment based initiatives, this including sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes.
- 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.
- The opportunities for improving access, understanding or enjoyment of the historic environment and heritage assets as part of the design and implementation of flood risk management measures.

Historic England advises that the local authority's conservation and archaeological advisers are involved throughout the preparation, assessment and implementation of the strategy, as they are often best placed to advise on:

- baseline information on the historic environment and heritage assets through the county-based Historic Environment Record (HER);
- the significance of designated and non-designated heritage assets;
- local historic environment issues and priorities, as for example heritage assets vulnerable to the effects flooding and or those that have been harmed by previous flooding events;
- how flood risk management measures can be tailored to avoid or minimise potential adverse impacts on the historic environment;
- the nature and design of any required mitigation measures; and
- opportunities for securing wider benefits for the future conservation, management and enjoyment of heritage assets, whether through the design and implementation of individual measures and schemes and wider catchment management proposals.

The comments set out below supplement our general advice on SEA/SA by outlining specific considerations relevant to flood risk management.

Review of Plans, Policies and Programmes

Historic England advice on SEA/SA recommends that the review includes plans and programmes that have a direct bearing on the historic environment. An indicative list is provided in our SEA guidance of plans and programmes at the international, national, sub-national and local level.



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Historic England acknowledges that the current review will concentrate on those policies, plans, programmes that are most relevant to the flood risk management and to the implementation of the strategy. Relevant historic environment considerations, however, should still be fully taken into account in the review as for example:

At the national level:

- The National Planning Policy Framework recognises that the protection and enhancement of the historic environment is integral to achieving sustainable development.
- The Flood Risk Regulations 2009 include a requirement to have regard to the desirability of reducing the adverse consequences of flooding for the environment (including cultural heritage).
- The Flood and Water Management Act 2010 includes a requirement for local authorities, highway agencies and Internal Drainage Boards to contribute towards sustainable development when exercising their flood and coastal erosion risk management functions¹. Supporting guidance² on this duty includes, within its definition of sustainable flood and coastal erosion risk management, improving the resilience of the natural, historic, built and social environment to current and future risks, as well as protecting natural and heritage assets and enhancing the environment where it is most degraded.
- The National Flood and Coastal Erosion Risk Management Strategy for England includes a guiding principle on achieving multiple benefits, such as enhancing and protecting the built, rural and natural environments, cultural heritage and biodiversity and in all instances flood and coastal risk management should avoid damaging the environment, including the historic environment.

At the local level:

- Conservation area appraisals and accompanying management plans, particularly for conservation areas identified as at risk of flooding.

Baseline

In accordance with our guidance on SEA/SA, Historic England recommends that a broad definition of the historic environment is used to establish the baseline. 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. The cultural heritage overview of Thurrock in Section 4.3 of the report is useful, including reference to Heritage at Risk.

Together with our general advice on baseline information and the historic environment, the following data sources can be particularly useful in providing locally specific information, as for example:

¹ The Environment Agency already has a similar duty under the Environment Act 1995

² Guidance for risk management authorities on sustainable development in relation to their flood and coastal erosion risk management functions (2011), Defra



- Historic Environment Records: These can be interrogated in various ways, as for example, heritage assets located in identified Flood Risk Areas or river catchments, and or heritage assets associated with rivers and other water-dependent habitats or water-level management regimes (e.g. historic bridges, weirs, mills).
- Preliminary Flood Risk Assessments: These assessments may identify heritage assets as a key site at risk of flooding.
- The character of the historic landscape and townscape and other valued historic landscapes: Historic Characterisation studies such as county based historic landscape characterisations 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. Such information may be of help informing the location and sensitive design of Sustainable Drainage Systems within the existing urban fabric.

Historic England also recommends that the baseline takes account of areas of archaeological importance and the potential for unrecorded archaeology: This may include buried, waterlogged archaeological and palaeo-environmental remains of significant interest and fragility that can be associated river valleys, floodplains and wetland areas.

Historic England recommends that, wherever possible, data sets are mapped. This will aid the assessment process by helping to identify those heritage assets or groups of assets that may be at most risk from flooding and or potentially impacted by proposed measures to help manage flood risk or improve resilience.

For both designated and non-designated heritage assets, an important consideration is the contribution of their setting to their heritage interest or significance. The significance of a heritage asset can be harmed or lost by development within its setting. New development within the setting of a heritage asset may also offer opportunities for enhancing or better revealing its significance, for example, removing a culvert may serve to improve the character and experience of a historic townscape or landscape.

With regard to heritage assets identified as at risk in the National Heritage at Risk Register or local registers, consideration could be given to screening the records to identify if the at risk status is associated in some way with flood risk and or whether flood risk might exacerbate the problem. For example, this might include whether a conservation area at risk is within a high flood risk area, or whether the sustainable use of a listed building at risk might be hampered by its location in a flood risk area as a result of limitations put on its use or the design solution for its repair and reuse.

Up-to-date information on the National Heritage at Risk Register is available via: <http://risk.historicengland.org.uk/register.aspx>



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Key Environmental Issues

Environmental problems, issues and opportunities affecting the historic environment in the context of the strategy could include the following depending on the local baseline and the nature and prevalence of flood risk.

- Most heritage assets are vulnerable to flooding and a range of heritage assets are likely to be at risk of flooding, which may result in harm to or loss of their significance. This may be as a result of direct flood damage as well as inappropriate remedial works³.
- Proposed flood risk management measures and measures to improve resilience have the potential to impact on the significance of heritage assets, including the contribution made by their setting.
- Securing the sustainable use of heritage assets, including those identified as at risk, may be hindered by their location in high flood risk areas.
- Accommodating measures such as Sustainable Drainage Systems, whilst sustaining and enhancing the character of historic townscapes and landscapes and the significance of areas of archaeological interest and or potential interest.

We welcome the discussion of key environment issues relating to the historic environment in Section 4.6.1.

SEA Framework

Historic England recommends the SEA assessment framework includes a specific headline objective for the SEA topic on Archaeology and Cultural Heritage, for example:

‘Conserve and enhance the historic environment, heritage assets and their settings’

The current draft SEA objective on page 34 of your report could be amended as above.

In addition to the head-line objective, it can also be beneficial for the SEA framework to include relevant sub-objectives (decision-making criteria) to help ensure that all the key heritage issues are considered and potential effects (direct and indirect) appropriately assessed. Examples of decision-making criteria that may be relevant for the strategy include:

- Will the measures reduce the number of heritage assets at risk of flooding?
- Will the measures harm the significance of designated and non-designated heritage assets, including their setting?
- Will the measures help secure the sustainable use of a heritage asset and or improve its maintenance?
- Will the measures lead to changes in groundwater levels or chemistry that could alter the hydrological setting of water-dependent heritage assets, including palaeo-environmental deposits?

³ English Heritage (2010) Flooding and Historic Buildings <https://www.historicengland.org.uk/images-books/publications/flooding-and-historic-buildings/>

- Will the measures involve 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 measures conserve and enhance the local character and distinctiveness of historic townscapes and landscapes?
- Will the measures increase public awareness and understanding of appropriate responses for heritage assets affected by flooding and the design and implementation of other measures aimed at risk management or improving resilience?
- Will the measures provide opportunities for improved access, understanding and enjoyment of the historic environment?

The Historic England guidance on SEA/SA recognises that a combination of different types of indicators is likely to be necessary as part of the assessment process. However, the priority should be the inclusion of indicators which clearly demonstrate the significant impact(s) of the strategy on the historic environment, whether positive or negative. For example, recording numbers of assets may be appropriate as part of the baseline, but are not normally recommended for monitoring impacts.

Appendix 4 of our SEA/SA guidance provides examples of indicators for the historic environment that can be tailored to local circumstances and suggests ways in which they can be framed to:

- describe the baseline or state of the historic environment;
- monitor the type of impact or outcome; and
- track wider policy responses or actions taken to conserve and improve the historic environment, and mitigate any degradation (including avoiding or rectifying adverse impacts).

With respect to specific indicators for the strategy, we note and welcome the two shown against the SEA Objective for cultural heritage. Additional topic specific indicators might include:

- Proportion of conservation area ground at risk from flooding
- Number of designated and non-designated heritage assets harmed by flood risk management measures, including impacts on their settings

We trust the above recommendations will be of help in taking forward the assessment and strategy. Should you require any further information or wish to discuss any of the above comments in more detail, please do not hesitate to contact me.

Yours sincerely



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