



By email only

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Telephone



22 May 2023

Dear Sir or Madam

Strategic regional water resource solutions: standard gate two draft decision for Historic England - East and South West regions

Thank you for consulting Historic England on the above. Apologies for the delay in responding to this. This letter is an additional letter to one already sent by our Midlands teams with regards to the South Lincs Reservoir and covers projects in the East and South West.

As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of heritage assets is fully considered and accorded proper weight in accordance with legislation and the National Planning Policy Framework at all stages and levels of the process.

Overall, Historic England (HE) have identified some concerns with overall lack of engagement with the historic environment in the draft decision. We would request a requirement for further historic environment work and engagement with stakeholders (including Historic England) is added in the draft decision recommendations.

Please see appendix 1 for details of individual schemes.

Next steps

Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment on the proposals as they come forward. We have however flagged a number of concerns about the lack of historic environment engagement from the applicants and promoters of the various schemes and feel the gate 2 submissions would have been improved had there been better engagement.





Historic England

We hope that the above comments are of assistance. Please do not hesitate to contact me to discuss,

Yours sincerely

Dr Will Fletcher

Development Advice Team Leader



See Appendix 1 below



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Appendix 1 - Comments table

Scheme	Decision	Historic England (HE) comments on draft decision	Further Work recommended by HE prior to interim review or Gate 3
Anglian Water – Affinity Water transfer	Yes, for the Peterborough to Grafham transfer element only	No engagement with HE to date and we are unclear of the scope or likely impacts	We recommend AW set out a short summary and overview and contact HE for early pre-application advice.
Fenland Reservoir	Conditional review, Jan 2024	<ul style="list-style-type: none"> • Broadly the overall lack of historic environment references in draft decision is a concern. • We suggest that the recommendations in the final column should be included in the draft decision recommendations. <p>We agree with the following comments in the draft decision:</p> <ul style="list-style-type: none"> • Concern over site selection evidence base • Cumulative impact of reservoir, abstractions and transfers should be considered in a holistic way, not separately • Provide evidence of results from non- stat consultations and show actions taken as a result of consultation findings • LVIA work needed. Detailed site-specific landscape and mitigation measures • Prioritise the identification of environmental risks impacts and propose mitigation requirements where necessary 	<ul style="list-style-type: none"> • We recommend the applicant go back to the site selection and review the decision-making process. In particular the timing of the final decision was made before the historic environment evidence had been provided and reviewed by stakeholders. • The applicant needs to look at how the preferred solution performs against other feasible options from a historic environment perspective. • A Heritage Impact Assessment is therefore needed in relation to all 4 options. • A more detailed Heritage Impact Assessment is needed for the chosen option. • The evidence base will need to include archaeological assessment. This should include a desk-based assessment and a deposit model. • The deposit model should inform the selection of the geophysical techniques. At present there are many unknowns relating to undesignated archaeology. • Consequently, it cannot be assessed if potential mitigations and future work programmes are appropriate. • To ensure that appropriate mitigations can be developed the applicant should ensure that archaeological assessment (including intrusive investigations) are commenced as early in the programme as practicable.





			<ul style="list-style-type: none"> This is to help inform the detailed design the reservoir and associated infrastructure. It should also be ensured that investigations are appropriately sequenced to ensure an iterative process which allows for informed decision taking. Opportunity should be provided for a geoarchaeologist to be involved in any geotechnical investigations occurring at the site. LVIA work is also required to assess impact and identify site specific heritage, landscape and mitigation measures
Grand Union Canal Strategic Transfer	Yes, subject to conditional review point in relation to Minworth	<ul style="list-style-type: none"> The historic environment was not mentioned in the documentation and we would welcome a recognition that the impact of the scheme of the historic environment could potentially affect choice and acceptability of scheme options. We note at 3.4.5 (Environment) other environmental issues have been considered and in our view the submission also falls short on the historic environment Recommendations at 4.1 could include recommendation on heritage assessment. 	<ul style="list-style-type: none"> Engagement with HE has now commenced (early in 2023) More information is however required on pipeline routing and impacts. Specifically, the water entry and abstraction points, the pumping station location and the transfer pipelines. Heritage Impact Assessments would be required of the GUC for potential risk and impact on designated and non-designated heritage assets and loss of character. Options appraisal that include HIA need to be undertaken for the location of the entry and abstraction points and proposed pipelines Archaeological assessment will also be required, and we recommend engagement with other heritage sector specialist as soon as possible.
Severn to Thames Transfer	Yes, subject to any decisions taken at a Conditional Review Point	<ul style="list-style-type: none"> The historic environment was not mentioned in the documentation and we would welcome a recognition that the impact of the scheme of the historic environment could potentially affect choice and acceptability of scheme options. Covering letter indicates that both Option 1 (Deerhurst to Culham Pipeline) and 'proposed further engagement around 	<ul style="list-style-type: none"> We are aware the STT project team have put a pause on arranging further engagement with HE is pending their review of responses to the Thames Water dWRMP. More information is required needed on pipeline routing and impacts. Ensure that basis for decision on pipeline versus canal option includes good understanding of potential heritage/cultural/ societal costs and benefits.





		<p>the Cotswold canal options should continue to be explored.</p> <ul style="list-style-type: none"> • HE are supportive of this due to potential for canal option to address heritage at risk and bring wider public benefits, but it's not really reflected in the Gate 2 Decision? • Concerns are identified by Ofwat around stakeholder engagement for Wales. Under 'Solution Design' there's a more general statement about falling short in relation to stakeholder engagement, (again some focus on Wales). • Please note that only limited engagement has been carried out with Historic England to date • Deep dive into environmental and cultural costs/benefits re Wales invited prior to Gate 3. Our view is that it would also be helpful to see detailed work on costs/benefits of the canal option. • There may be a Conditional Review Point to consider response to priority actions – HE would support this approach but would also request actions to explicitly address heritage issues. 	<ul style="list-style-type: none"> • Opportunity to explore options for co-funding canals. associated with e.g. heritage-based regeneration? • United Utilities <i>Initial Environmental Appraisal</i> considers heritage at high level and identifies heritage impacts for some parts of scheme (particularly pipeline) but states no works within designated areas. Recommends further consultation with HE. Welcome this but also request detailed HIA to understand impacts and inform scheme design. • Recommend Desk-based assessment for the route corridor, followed by geo physics and targeted archaeological evaluation trenching as required.
South East Strategic Reservoir Option (ear Abingdon)	Yes	<ul style="list-style-type: none"> • Currently being managed by Historic England South East Team. 	<ul style="list-style-type: none"> • We has had some engagement over the proposal and further engagement with HE and other heritage stakeholders is recommended as soon as possible.
Thames to Affinity Regional Transfer	Yes	<ul style="list-style-type: none"> • No information currently available and more detail required. 	<ul style="list-style-type: none"> • Is this a long-term aspiration and how far along are the plans? • Engagement recommended with HE and other heritage stakeholders as soon as possible.
Thames Water to Southern Water Transfer	Yes	<ul style="list-style-type: none"> • No information currently available and more detail required. 	<ul style="list-style-type: none"> • Given the lack of available detail it is difficult to make meaningful comments at this stage.





			<ul style="list-style-type: none"> • Is this a long-term aspiration and how far along are the plans? • Engagement recommended with HE and other heritage stakeholders as soon as possible.
Poole Effluent Recycling and Transfers	Yes, though funding changing	<ul style="list-style-type: none"> • Publication scheduled May 2023. 	<ul style="list-style-type: none"> • Comments provided here are based on SRO Gate 2 report. • Given the lack of available detail it is difficult to make meaningful comments at this stage. • More information needed on pipeline routing and impacts. • Heritage Impact Assessment to inform SRO selection and design. • Support Gate 2 submission recommendations for full Historic Desk-Based Assessment, geophysical surveys at areas of archaeological potential along the pipeline route, evaluation trenching and geophysical survey in the period to Gate 3. The proposed wetland area should also be considered as this is identified as having potential for unknown archaeology.
Cheddar Two source and transfer	Continued development funding will be available to progress the solution up to the Conditional Review Point	<ul style="list-style-type: none"> • Publication scheduled May 2023 	<ul style="list-style-type: none"> • Comments are based on SRO Gate 2 report. • More information needed in particular re the c.50km. pipeline routing and impacts • Gate paper details stakeholder engagement for Gate 2 but this did not include HE. There is a commitment to further consultation with statutory consultees in future, which should include HE. • Recommend Heritage Impact Assessment to inform SRO selection and design. • Gate 2 submission recommends early historic environment desk-based assessment and initial walkovers to then inform geophysical surveys or intrusive investigations if





			<p>necessary – we support this and would recommend wider consultation on this approach with stakeholders.</p> <ul style="list-style-type: none">• HE did not object to previously approved reservoir scheme.
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