



Historic England

Environmental Agency Consultation: Draft Flood Risk 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 the consultation on draft Flood Risk Management Plans (FRMPs) for the period 2021-2027.

This response deals primarily with the National Overview to FRMPs and how that is translated into the FRMPs. It is not possible to comment here in detail on each individual FRMP, 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 FRMPs are further developed and delivered.

We would welcome the opportunity to work together to support greater recognition of the historic environment in flood risk management, in terms of the impact but also the potential opportunities it affords in delivering flood risk management 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 flooding, and by flood risk management (FRM) responses, the historic environment can also play a practical role in helping to manage flood risk; for instance, through learning from traditional approaches to water management, living with water and responding to flooding. The historic environment can also support community engagement with flood risk 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 IPCCⁱ, the G20 and the UN Race to Resilienceⁱⁱ. Historic England's work to explore the relevance of the historic environment to natural flood management is included within the current UK National Adaptation Programmeⁱⁱⁱ.

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, Registered Parks and Gardens, Registered Battlefields and Protected Wreck Sites.

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 FRMPs 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 FRMPs and welcome the opportunity to engage with you at a regional level on the details of the individual Plans as they are further developed.

Draft Part A National Overview of Flood Risk Management in England for Second Cycle Flood Risk Management Plans 2021 to 2027

This document makes a number of references to cultural heritage, with objective 8 (under the heading “Flood risk regulations - minimising the consequences of flooding for the environment including cultural heritage”) stating:

“By 2027, actions by risk management authorities to address current and future risk of flooding and coastal change will have helped achieve the environmental objectives set out in the river basin district's river basin management plan.”

We are concerned that:

1. This will miss opportunities to integrate FRM and protection of the historic environment (by seeing it only as “minimising the consequences”); and
2. The objective makes no direct reference to the historic environment (or “cultural heritage”) and it defers objectives to individual river basin management plans (via the FRMPs), rather than having a consistent strategic approach to the integration of FRM with management of the historic environment.

To be consistent with national legislation (Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monuments and Archaeological Areas Act 1979) and policy (National Planning Policy Framework, 2021, (NPPF) and the online Planning Practice Guidance) relating to protection of the historic environment, strategic objectives and policies should seek to preserve or enhance the historic environment and, when unavoidable, seek to minimise the consequences of flooding, and related interventions, on it.

In order to integrate FRM and protection of the historic environment we would recommend that consideration be given (and reference made) to:

1. The impact of flooding and coastal erosion on the historic environment, including designated and non-designated heritage assets (as well as potential, but as yet unknown, archaeological deposits).
2. Maintaining, and where possibly increasing, the contribution that the historic environment makes, or can make, to water management and flood alleviation/risk management. In addition to physical infrastructure, such as coastal defences, this might include other man-made features, such as water meadows used for pluvial/fluvial water management.

3. The impacts, both positive and negative, of flood alleviation measures on the historic environment, including:
 - a. Direct impacts on designated and non-designated heritage assets, including impacts at landscape level and to the archaeological resource.
 - b. Indirect impacts, such as on setting of heritage assets, as well as the impacts of changes in hydrology (such as an increase in the water-table, dewatering and consequence of increased frequency of wetting and drying) on archaeology.

General Comments on the Draft Flood Risk Management Plans

The overall environmental objective (no. 8) in Part A defers to the objectives in the river basin management plans (via the FRMPs). Unfortunately, the FRMPs do not have sufficiently detailed historic environment management objective and policies, either at a strategic or project level, nor do they take a consistent approach to the historic environment. For example:

- Not all FRMPs refer to all designated heritage asset types; with some, for example, omitting to mention conservation areas or Registered Battlefields.
- Not all FRMPs refer to non-designated heritage assets.
- Not all FRMPs refer to the importance of the setting of heritage assets, nor the need to consider wider landscape or place impacts of any proposals.
- Some of the data sources (e.g. in the SW River Basin District Draft FRMP) are out of date.

In general, where reference is made to the heritage assets it is more in the context of noting their existence in a particular plan area (e.g. the number of listed buildings) rather than setting out positive, strategic management plan policies for their preservation or enhancement.

In addition to general historic environment policies in FRMPs (sitting below the strategic objectives in Part A), there is also a need for locally specific historic environment policies to address project proposals at an area- and site-based level. These need to consider the impacts of projects on the wider urban and landscape character, which contribute to the sense of place, as well as considering individual heritage assets.

Management plan policies need to be informed by evidence about the historic environment, such as that contained in local Historic Environment Records (HERs) and other archival sources on designated and non-designated heritage assets, archaeological potential and local geology. They also need to be informed by documents such as Conservation Area and World Heritage Site Management Plans, Historic Urban and Landscape Characterisation Studies, etc.

As previously noted, FRMPs need to recognise that changes to water regimes can affect historic assets through flooding, and through dewatering, and as a consequence of increased frequency of wetting and drying: these impacts need to be assessed and considered. Changes in water levels, redirecting water, and flooding can affect ground stability and the stability of historic structures, as well as the preservation of archaeological remains (including through the erosion of sites and through changes in the burial conditions of below ground archaeological deposits). In areas considered to

be of high archaeological potential, preserving significant organic archaeological remains is an important consideration.

Policies should also consider the issue of contaminated sediments associated with past industries, many of which may be designated heritage assets (e.g. mining, quarrying, water-powered mills of various sorts). In those instances, those responsible for remediating contaminated land will need to be aware of the guidelines for managing change within the historic environment. When it is appropriate to remove features of archaeological interest it will be necessary to ensure recording and investigation has been undertaken, unless strictly necessary to avoid that due to health hazards.

FRMPs should also include policies and objectives to deal with Heritage (assets) at Risk: both those on the national or a local list. This is particularly important if the asset in question is at risk from the impacts of flooding.

Within the draft FRMPs there is reference to Coastal Erosion and Shoreline Management Plans (SMPs): we have prepared guidance on SMPs and the historic environment which might be of use. It includes information and guidance on the coastal historic environment, sources of advice and data, the legislative and planning background, and the consultation process that should be followed when SMPs are reviewed. It is intended to supplement and amplify SMP guidance published by Defra.

It is important to consider historic causes of flooding and anthropogenic as well as natural changes to landscapes across time to understand and better predict impacts of flood risk linked to climate change. In that sense, utilisation of historic environment data and evidence can add a layer of valuable information in understanding long-term impacts and integrating mitigation and adaptation approaches in FRMPs. Across coastal and inland Flood Risk Assessments there are important opportunities to draw on historic environment evidence and insights to understand how the risk to people and property has arisen, and also for heritage to play a role in community resilience by helping people to understand likely change.

Historic England has concerns regarding the impacts of managed realignment or habitat creation where such works directly affect, or prompt erosion of, areas of archaeological potential. It is also noted that activities such as beach nourishment have recently been resulting in archaeological material coming to light, within aggregates sourced from offshore, with negative implications for interpreting/recognising local *in situ* archaeological deposits that might be eroding.

We would also recommend that references in the FRMPs to *scheduled ancient monuments* be amended to read *scheduled monuments*, to be in line with legislation, policy and guidance.

Strategic Environmental Assessment (SEA) Reports

All the FRMPs should integrate measures related to delivery of the conservation, enhancement and enjoyment of the historic environment following relevant EA guidance. Like the FRMPs, the SEA reports included in the consultation are of varied scope and structure, with many merely assessing the impacts to the historic environment as “vague”.

Existing reference to heritage assets in those documents is mainly restricted to their presence in the areas of interest and general implications or negative impacts that may emerge at project level, without including specific mitigation approaches at a

strategic level. In many SEAs, it is evident that further and more updated evidence is necessary to allow for a definite assessment of potentially significant (or harmful) effects on cultural heritage.

The national and local plans, programmes and policies sections of the SEAs need to mention clearly the implications for mitigation actions. Such plans need to adhere to NPPF requirements (particularly in relation to those in chapter 16, Conserving and enhancing the historic environment).

Flood Explorer and Structure of the FRMPs

The integration of the Conservation Tables in the Explorer is welcome and Historic England would happily support their improvement. This provides an opportunity to consider and clearly understand the presence of historic assets and for potential (negative) impacts to be mitigated or benefit to be shared through their protection. In its current form, however, the tables do not allow for many conclusions to be made as there are only 'yes/no' answers to most of the fields, which limits understanding on how the assessment was made.

A holistic approach to assessment would allow for spatial data (on catchment areas, River Basin Districts and more) to be downloaded by the users for further investigation, through overlaying with other datasets (e.g. NHLE data or heritage assets GIS databases). Such an approach would fulfil the increasing requirements of digital planning and support collaborative work at project level. Such an approach would also allow for negative impacts on the historic environment to be properly considered and integrated in the tool.

Grouping the measures in core "search categories" could enable a more holistic understanding of actions to be taken either across a region or broader geographical location or across a strategic priority (e.g. protection, prevention etc). We would welcome this as it would further support strategic planning.

Other Matters

An inclusion of a specific measure related to collaboration and stakeholder working in Strategic Areas would support collaborative working with Historic England, help the identification of Heritage at Risk within Flood Risk Zones, and support strategic action for mitigating risks to all heritage assets.

Early engagement at regional level to discuss specific schemes, when key decisions are being considered, can ensure integrated decision making. It can also support actions so that potential harm to historic assets is avoided or mitigated through the planning approach.

It is important to identify how protection from flooding can happen while considering wider landscape character and maintaining sense of place, an area which early collaboration can help with, enabling greater understanding of the history of landscape changes and community connections with it.

Relevant HE guidance and research

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

Published guidance

Flooding and Historic Buildings, 2015 (2nd edition)

Making your Home Flood Resistant and Resilient

Water Meadows, 2018

Conserving Historic Water Meadows, 2017

Webinars

Flood Resilience of Traditional Buildings: Learning from Practice, 2021

Climate Change Adaptation: Flooding Part 1: Preparation Resistance and Resilience, 2020

Climate Change Adaptation: Flooding Part 2: Salvage Recovery and Restoration, 2020

Published research

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

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

Developing approaches to Managing loss of heritage assets – AHRC funded Research Project Landscape Futures^{iv} (University of Exeter led) due for completion 2022; AHRC Collaborative Doctoral Programme PhD ‘Articulating Loss’^v due for completion 2023

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)

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 FRMPs. Furthermore, we hope to engage with you at a regional level on the details of the individual Plans as they are worked up; particularly in areas with a rich history of water infrastructure interventions.

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ⁱ 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/>

ⁱⁱ 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/>

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

^{iv} <https://www.exeter.ac.uk/research/esi/research/projects/landscape-futures/>

^v <https://historicengland.org.uk/whats-new/research/articulating-loss-understanding-and-communicating-the-loss-of-coastal-heritage/>