

## Appendix 23: Historic England

1. Historic England		
1.1	Representation	<p>Brent. No precise location, but would appear to be in reasonably close proximity to Harrow Park – there are also other CAs nearby and a range of listed buildings.</p> <p>With regard to the proposed Brent Reservoir Scheme (AFF-RES-WRZ4-0832), we would welcome greater clarity as to its precise location before being able to offer a firm view as to the likely impacts on the historic environment. We note that the scheme in its entirety would appear to propose the creation of a new reservoir as well as increased abstraction of water from the existing Brent reservoir.</p>
	<b>Our Response</b>	<b>This option does not involve the creation of a new reservoir. It has been created in collaboration with a third-party owner of an existing reservoir. The third party in question proposed this as a potential scheme to us as part of our optioneering discussions and we have been in conversations to enhance the option throughout WRMP19.</b>
	Summary of any change to our final WRMP	N/a
1.2	Representation	<p>We would stress that all heritage assets, both designated and undesignated, are vulnerable to effects on their significance by infrastructure developments. In the course of developing and implementing the WRMP, we trust that you will consult the relevant Historic Environment Record and seek the necessary advice from the relevant local authority conservation officers to ensure that impacts on heritage assets are avoided or, where this is not possible, effectively mitigated against.</p>
	<b>Our Response</b>	<b>We will engage with Historic England and the relevant local authorities to ensure impacts are avoided or where possible, effectively mitigated against.</b>
	Summary of any change to our final WRMP	N/a
1.3	Representation	<p>We note that the first two schemes above are to be taken forward in partnership with Thames Water, and you will be aware of previous correspondence between Historic England and Thames Water with regard to the potential effects on the historic environment should they go ahead. A copy of Historic England's response to Thames Water's draft WRMP is attached elsewhere to this letter. We therefore note and welcome the proposed monitoring measures set out in Table 3 of the SEA.</p>
	<b>Our Response</b>	<b>The following sections (1.4 onwards) of Appendix 23 (Historic England) refer to the Historic England response to Thames Water with regards to the two schemes which are intended to be taken forward in partnership.</b>
	Summary of any change to our final WRMP	N/a
1.4	Representation	<p>The proposed reservoir would not result in the loss of any (currently) designated heritage assets. However, the Strategic Environmental Assessment identifies a risk of construction effects on several heritage assets, including Scheduled Monuments, a Conservation Area and a Registered Park and Garden, noting that these effects would be temporary and long-term.</p> <p>Historic England generally concurs with this assessment. There are indeed a number of conservation areas centred on historic villages nearby: Steventon, Drayton, Marcham and East Hanney, and a number of other designated heritage assets.</p>

1. Historic England		
	<b>Our Response</b>	<b>We are pleased to see Historic England concurs with our assessment.</b>
	Summary of any change to our final WRMP	N/A
1.5	Representation	<p>At Steventon, a large amount of modern housing stands between the conservation area and the Causeway (grade II* listed and lined with highly graded buildings) and as the land is very flat we do not consider that there will be intervisibility, so we not consider that there will be any direct impacts.</p> <p>For Drayton, modern development and the A34 mean that there is very unlikely to be a significant impact on the character or appearance of the conservation area. Likewise, in Marcham, the conservation area would be shielded from the reservoir by modern development. However, it may be visible from the Priory, which is grade II* listed and its rural context is very important. This needs to be scoped into any heritage assessment and future Environmental Impact Assessment (EIA).</p>
	<b>Our Response</b>	<b>We will scope the grade II listed Priory into any future heritage assessment and EIA work.</b>
	Summary of any change to our final WRMP	N/A
1.6	Representation	<p>For East Hanney, the bund would be very close, and we believe that it would be noticeable from the south-east corner of the conservation area, particularly at the junction of the A338 and Steventon Road. We consider that this impact is likely to be low but it still ought to be scoped into any future EIA and investigated further.</p>
	<b>Our Response</b>	<b>We will consider this potential impact within any future EIA.</b>
	Summary of any change to our final WRMP	N/A
1.7	Representation	<p>Of much greater concern to us is the likely impact on archaeological remains and the archaeological significance of the reservoir site. Although neither Table 11-8 nor paragraph 11.38 of Section 11 of the Draft WRMP19 nor, worryingly, the Strategic Environmental Assessment, contain any reference to the potential archaeological impacts of the reservoir (although Sustainability Objective 7.1 does include references to archaeology), we consider that the implications for (as yet unknown) archaeology are very great indeed.</p> <p>The reservoir site spans several Pleistocene river terraces and the Holocene floodplain area and, as a result, the 'overburden' (thought to be c 2 – 5m deep) that overlies the bedrock clays (that will be excavated to construct the borrow pits and reservoir) has potential to contain evidence of human activity from the Palaeolithic onwards.</p> <p>Not only might the sands and gravels of the river terraces contain Ice Age stone tools and environmental evidence, but the alluvial floodplain deposits are likely to contain a wealth of waterlogged artefacts, structures and environmental remains dating from the later prehistoric and historic periods. Associated evidence for 'dryland' archaeology is likely to also exist on the higher ground.</p> <p>The scale of the site means that any evidence preserved will have greater significance, as it will represent archaeological activity and associations at a landscape scale. All this archaeology will be destroyed by the excavation of the reservoir and other features of the scheme.</p>
	<b>Our Response</b>	<b>During our design stage, should a particular option be progressed, we will develop mitigation measures in association with Historic England, Natural England, the</b>

1. Historic England		
		<b>Environment Agency and local councils to ensure appropriate consideration is given to the archaeological investigations and any potential findings.</b>
	Summary of any change to our final WRMP	N/A
1.8	Representation	<p>The likelihood that archaeology will be encountered is noted in Table 2.17 in the 'Environmental Mitigation' section of the document (2.5). However, the approach to mitigation is identified as a Watching Brief in this table, which would be totally inadequate. It is suggested in 2.6.14 that any archaeological investigation would take place at the same time as stripping the site of vegetation and overburden. Although this makes sense, such archaeological investigation is likely to require far more detailed recording than a 'watching brief' on construction work implies.</p> <p>A more robust approach to archaeology, given the likely significance of the site would be:</p> <ol style="list-style-type: none"> <li>1. A desk-based assessment, which should include a geoarchaeological deposit model, identifying the likely depth and distribution of deposits of archaeological potential across the site for the full Quaternary sequence; as well as an assessment of the potential for Palaeolithic remains.</li> <li>2. Preliminary field evaluation (geophysical and borehole survey);</li> <li>3. Use of 1 and 2 to target trenches (and deeper test pits) for a further stage of field evaluation;</li> <li>4. Targeted excavation during ground reduction of the overburden where archaeology has been identified (alongside strip / map and sample and a watching brief as appropriate).</li> </ol> <p>We stress the need for a staged approach to archaeological investigation, as described above, as well as a window within the programme of groundworks for it to take place.</p>
	Our Response	<p><b>We believe the SEA contains an appropriate level of information and has assessed the option according to guidance.</b></p> <p><b>We are already progressing with plans to further develop our strategic options (SESR being one of these options) as directed by OFWAT through their Initial Assessment of Plans (IAP). We held a stakeholder assembly recently which looked to gather ideas from a variety of different stakeholders as to how they would like to receive information and be engaged with.</b></p> <p><b>We recognise this additional work is essential to support the planning application and further engagement with Historic England, Natural England and other relevant stakeholders will feature high on our agenda.</b></p> <p><b>During our design stage, should a particular option be progressed, we will develop mitigation measures in association with Historic England, Natural England, the Environment Agency and local councils to ensure appropriate consideration is given to the archaeological investigations.</b></p>
	Summary of any change to our final WRMP	N/A
1.9	Representation	<p>As acknowledged in the Sustainability Objective 7.1, changes in the water environment in areas adjacent to the site might also impact on archaeology not directly removed by the scheme. Whether such archaeology (currently known or as yet unknown) would continue to survive preserved following reservoir construction should be considered, preliminarily at least as part of any baseline information gathering for the SEA. This should therefore consider the range of archaeological evidence likely to currently exist on the site and whether such evidence would continue to be preserved if the water environment changes as a result of the scheme.</p>
	Our Response	<p><b>At this stage, there is uncertainty around whether or not archaeology is going to be found at this site or not. However, we will commit to undertaking the relevant surveys at the time at which this option is selected for delivery.</b></p>

1. Historic England		
	Summary of any change to our final WRMP	SEA has included reference to heritage objectives and recommend arch surveys are done prior to construction.
1.10	Representation	<p>The Strategic Environmental Assessment also identifies the removal of existing landscape features as a temporary but longer-term construction effect pending the new vegetation maturing and aiding “the integration of the reservoir into the landscape”. However, and more important than any impact on particular designated assets, the proposed reservoir would have a huge impact on the landscape.</p> <p>This has heritage significance; the settlement pattern of small villages from which a rich, flat agricultural landscape is cultivated is an important part of Oxfordshire’s historic landscape character and the reservoir would obliterate a very substantial area of that. Any associated planting around the outskirts of the reservoir would not reinstate that landscape character.</p> <p>The general principle of the National Planning Policy Framework is that harm to heritage assets should be avoided where possible. In the case of the proposed reservoir, we note that there is an alternative option in the form of a Severn-Thames transfer. We note that the SEA also assesses the potential impacts of this scheme on Sustainability Objective 7.1 to be “major adverse”. This appears to be because of the potential construction risks to a range of listed buildings, scheduled monuments, registered historic parks and gardens and other heritage assets around Deerhurst and along the route.</p> <p>However, any risks arising purely from the construction phase of any elements will be temporary. The potential harm to heritage assets arising from a Severn-Thames transfer scheme therefore need only be temporary, whereas the potential harm that would arise from the proposed reservoir at Abingdon would be permanent. In terms of harm to heritage assets therefore, the preference should be for the transfer scheme.</p>
	Our Response	<p><b>Our SEA contains scores which reflect Historic England’s views on these two strategic schemes. The SEA presents SESR as having major construction effects and moderate operational effects (prior to mitigation), whereas it assesses the Severn Thames Transfer as having moderate construction effects and minor operational effects (prior to mitigation). However, when set against other considerations such as water quality risks, carbon emissions associated with operation and economic cost, the SESR represents a better value option, as described in our Decision Making approach contained in Chapter 5 and Technical Report 4.9. of our submission. Following representations we have explicitly included a stage of cross checking the economic modelling outcomes against the multi-criteria analysis as part of our decision making process, and this demonstrated that overall MCA ranking matches well against the economic analysis.</b></p>
	Summary of any change to our final WRMP	N/A