



ENGLISH HERITAGE

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10 September 2014

Dear Mr Southon

South East London Flood Group Local Flood Risk Management Strategy SEA

Thank you very much for your letter dated 28 July 2014 consulting English Heritage on the Screening and Scoping reports for the London boroughs of Bexley, Bromley, Lewisham and the Royal Borough of Greenwich.

As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the strategic planning process.

English Heritage has published guidance on the Strategic Environmental Assessment of plans. We recommend that this publication - *Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) and the Historic Environment* (2013) - is used to inform the environmental assessment of Local Flood Risk Management Strategies (LFRMSs) and any supporting plans. The document is available in the guidance library on the Historic Environment Local Management (HELM) website.¹ For your convenience we outline below general and specific considerations relevant to flood risk management and SEA Scoping / Environmental Reports accompanying Flood Risk Management Strategies.

General comments and guidance

We have considered the SEA screening and scoping reports individually and detailed points relating to each are attached. We agree with the need for SEA of the LFRMSs, and have no further comment in relation to the screening reports.

The matter of flood risk has very great relevance to the conservation of the historic environment, both with regard to direct threats to heritage assets from water incursion or changes to the water-table, and from the potential developments or measures that may be

¹ www.helm.org.uk



put in place to manage flood risk. The exposure of heritage assets may be summarised as falling into the following categories:

- 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, and including impacts on water-related or water-dependent heritage assets.
- The potential implications of flood risk for securing a sustainable reuse for heritage assets, including their repair and maintenance.
- 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. Increasing groundwater levels and the effects of re-wetting can also be harmful.

We would, however, like to highlight that flood risk management presents certain opportunities for positive conservation, for example:

- 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.
- Opportunities 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.
- 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.

We hope that by identifying the significance of the historic environment in these south east London boroughs, and the threats and opportunities that may apply, the SEA process will assist in identifying the best possible approach for the LFRMSs, in line with the concept of sustainable development.

English Heritage advises that the relevant local authorities' conservation officers (and archaeological experts where available, and appropriate) are involved throughout the preparation, assessment and implementation of a LFRMS, as they are often best placed to advise on:

- baseline information on the historic environment and heritage assets;
- the significance of 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 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 attached to this letter in Annex 1 relate to all the SEA report as there is commonality in the text of the reports. The specific comments relating to the section 4 Environmental Characteristics and key issues are covered in separate annexes for each borough. I hope this is helpful.

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Please do not hesitate to contact me should you have any queries arising from this response.

Yours sincerely

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Annex 1

South East London Flood Group Local Flood Risk Management Strategy SEA

English Heritage Comments on the Draft SEA scoping documents:

(Comments relate to a review all sections of the documents with the exception of section 4)

Section 3 Other relevant policies, plans and programmes

Table 4

We note and welcome the identification of the *National Planning Policy Framework* (NPPF) in Table 4. The reference to the *Heritage Protection White Paper 2007* is now no longer needed – this paved the way for various new approaches and measures since introduced. There are, however, documents supporting the National Planning Policy Framework (NPPF) which should be included. These are currently being revised but comprise the still extant PPS5 *Practice Guide* and the draft English Heritage *Good Practice Advice Guides* which will supersede the former. These are available on our website², and contain more detailed information on the application of policies contained within the NPPF. We recognise that, as these documents are emerging, you will wish to finalise the references once they are published.

At a local level conservation area appraisals and accompanying management plans, particularly for conservation areas identified as at risk of flooding, may be relevant. The Council's conservation officer would be able to advise on whether these are useful in the local areas concerned. Where a World Heritage Site or other major heritage asset has a management plan, this may also contain useful information, and could be identified in Table 4.

Section 5 SEA Framework

In table 8, the objective is acceptable and we note can cover a range of considerations. Reference to 'heritage assets' rather than 'historic sites' would be preferable, as the former term has a specific meaning in the NPPF.

It can be beneficial for the SEA framework to include relevant sub-objectives (decision-making criteria) to help ensure key heritage issues are considered, ie to 'unpack' the headline objective. Examples might be:

- Will the measures reduce the number of heritage assets at risk of flooding? (your indicator)
- Will the measures harm the significance of heritage assets, including their setting?
- Will the measure help secure the sustainable re-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?

² English Heritage's draft *Good Practice Guide on the Setting of Heritage Assets* is the most relevant and is available in draft at:
<http://www.english-heritage.org.uk/professional/advice/government-planning-policy/national-planning-policy-framework/>



- Will the measures conserve or enhance the local character and distinctiveness of historic townscapes and landscapes?
- Will the measure increase public awareness and understanding of appropriate responses to heritage assets affected by flooding?

The indicator for the historic environment is acceptable, although we recommend that this should refer to 'heritage assets' rather than 'historic sites'. Additional indicators would be helpful, especially to reflect the potential for impacts, positive and negative, of flood risk management measures. For instance:

- The proportion of conservation area at risk of flooding
- The number of designated and non-designated heritage assets harmed by flood risk management measures, including impacts on their settings.
- The number of flood risk management measures implemented that conserve and enhance heritage assets

In relation to the above, we recognise that you may need greater brevity and that these considerations may be incorporated in fewer additional objectives and indicators.

Section 6 Next steps

We have no comments on this section.



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Annex 2 Bexley SEA scoping report - section 4

Environmental characteristics and key issues

It is important that the borough's local conservation staff (including archaeological officer, where appropriate) are engaged throughout the SEA process to ensure that the environmental information is augmented as necessary. Further advice can also be provided by the Greater London Archaeological Advisory Service (GLAAS) located within English Heritage.

We have the following comments on this section:

4.2. Landscape and visual amenity.

In the fifth paragraph, we note that the reference should be changed to Bexley. The identified registered historic parks and gardens are correctly identified. The key environmental issues identified for Landscape are considered appropriate.

It may be worth noting (if appropriate) that changes to river corridors can potentially impact on the significance of a registered park if proposals, for instance, to naturalise watercourses conflict with manmade interventions integral to the designed landscape.

4.5 Historic Environment

The summary of heritage assets in this section is useful.

We suggest some minor changes:

- Registered parks and gardens could be identified by name here (third bullet, p19).
- The reference to non-designated heritage assets (p19, para above the map) has great relevance to areas of high archaeological potential. The London Borough of Bexley archaeological review 2013/14 should be referred to here – this work is currently identifying archaeological priority areas. Therefore the areas of archaeological importance marked on the map on p19 will be superseded. We advise that if the new information is not yet available the AAIs should be retained on the map, with a footnote stating that the areas are presently being reviewed and updated.
- We welcome the incorporation of information from the Heritage at Risk Register. There is a need to identify if this refers to the Borough's own register, or that published by English Heritage. In the case of the English Heritage register, this is an annual publication, and so we would recommend that you refer to the most up-to-date report which is 2013. The next report is published in October. If possible where the 'heritage at risk' status is clearly associated with flood risk, this should be identified.

The section on key environmental issues (p20) identifies important general issues. We suggest that the third sentence is amended at the end to '...could also have adverse impacts, including indirect impacts on the setting of heritage assets'. If specific information is available from Conservation Area Appraisals or Management Plans for major heritage assets, such information could be added here. It would be suitable to refer to the need for archaeological assessment and mitigation where flood risk measures could affect areas of archaeological interest, or potential.

Table 6 SEA scoping summary, p25 – the content for the historic environment is generally appropriate. We suggest that there should be reference to opportunities to protect and enhance all heritage assets, including major sites.



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Annex 3 Bromley SEA scoping report - section 4

Environmental characteristics and key issues

It is important that the borough's local conservation staff (including archaeological officer, where appropriate) are engaged throughout the SEA process to ensure that the environmental information is augmented as necessary. The borough's recent characterisation report might be drawn on more explicitly. Further advice can also be provided by the Greater London Archaeological Advisory Service (GLAAS) within English Heritage.

We have the following comments on this section:

4.2 Landscape and Visual amenity

We welcome the recognition of the contribution of historic landmark buildings to the landscape, and that this matter is highlighted under the key environmental issues.

We also note and welcome the references to the Registered Historic Parks and Gardens in the district. It may be worth noting (if appropriate) that changes to river corridors can potentially impact on the significance of a registered park, if proposals to naturalise watercourses conflict with manmade interventions integral to the designed landscape.

4.6 Historic Environment

This section provides a useful summary of the heritage assets within the borough.

We suggest some minor changes:

- Registered parks and gardens could be identified by name here (third bullet, p20).
- There is a need to include reference to non-designated heritage assets. These might include locally listed buildings, but is likely to have most relevance in this context to unscheduled archaeology. We recommend that you contact the Greater London Archaeological Advisory Service to ensure that areas of high archaeological potential, or archaeological priority areas, are identified, and included in a map of the heritage assets in this section.
- We welcome the incorporation of information from the Heritage at Risk Register. There is a need to identify if this refers to the Borough's own register, or that published by English Heritage. In the case of the English Heritage register, this is an annual publication, and so we would recommend that you refer to the most up-to-date report which is 2013. The next report is published in October. If possible where the 'heritage at risk' status is clearly associated with flood risk, this should be identified.

English Heritage recommends that SEA scoping reports include a map of the identifiable heritage assets including listed buildings (and locally listed buildings if appropriate), conservation areas, registered historic parks and gardens, scheduled monuments and the extent of the identified areas of high archaeological potential.

The section on key environmental issues (p21) identifies important general issues. We suggest that the third sentence is amended at the end to '...could also have adverse impacts, including indirect impacts on the setting of heritage assets'. If specific information is available from Conservation Area Appraisals or Management Plans for major heritage assets, such information could be added here. It would be suitable to refer to the need for archaeological assessment and mitigation where flood risk measures could affect areas of archaeological interest, or potential.

Table 6 SEA scoping summary, p28/29 – the content for the historic environment is generally appropriate. We suggest that there should be reference to opportunities to protect and enhance all heritage assets, including major sites.

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Annex 4 Royal Borough of Greenwich SEA scoping report – section 4

Environmental characteristics and key issues

It is important that the borough's local conservation staff (including archaeological officer, where appropriate) are engaged throughout the SEA process to ensure that the environmental information is augmented as necessary. Further advice can also be provided by the Greater London Archaeological Advisory Service (GLAAS) within English Heritage.

We have the following comments on this section:

4.2 Landscape and visual amenity

It would be appropriate to identify the three historic landscapes referred to on p10 as registered historic parks and gardens. It is helpful to include a clear reference to the status of these landscapes here (as well as under the historic environment theme) to understand their vulnerability in a wider landscape context.

Within the key environmental issues on p13 it may be worth noting (if appropriate) that changes to river corridors can potentially impact on the significance of a registered park, if proposals to naturalise watercourses conflict with manmade interventions integral to the designed landscape.

4.6 Historic environment

This section provides a useful summary of the heritage assets within the borough.

We suggest some minor changes:

- We welcome the incorporation of information from the Heritage at Risk Register (p20). There is a need to identify if this refers to the Borough's own register, or that published by English Heritage. The information here appears to be in need of updating. In the case of the English Heritage register, this is an annual publication, and so we would recommend that you refer to the most up-to-date information contained in the 2013 report. The next report is published in October. If possible where the 'heritage at risk' status is clearly associated with flood risk, this should be identified.
- The reference to non-designated heritage assets (p20, para above the map) has great relevance to non-scheduled archaeology. We welcome the information included here from the here reflecting the recently work to define Areas of High Archaeological Potential (AHAPs), and the definition of these on the map.
- We would recommend that the map on p20 is revised to include all identifiable heritage assets, including listed buildings (and locally listed buildings if appropriate), conservation areas, registered historic parks and gardens, and scheduled monuments (as well as the AHAPs).

The section on key environmental issues (p21) identifies important general issues. We suggest that the third sentence is amended at the end to '...could also have adverse effects, including indirect impacts on the setting of heritage assets'. If specific information is available from Conservation Area Appraisals or Management Plans for major heritage assets, such information could be added here. The final sentence relating to AHAPs needs a slight revision; we suggest the wording:

'...preliminary archaeological site investigations to assess the archaeological potential, and plan to avoid or mitigate the impact of a proposed development ...'

Table 6 SEA scoping summary, p26 – the content for the historic environment is generally appropriate. We suggest that there should be reference to opportunities to protect and enhance all heritage assets, including major sites.



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Annex 5 Lewisham SEA Scoping Report – section 4

Environmental characteristics and key issues

It is important that the borough's local conservation staff (including archaeological officer, where appropriate) are engaged throughout the SEA process to ensure that the environmental information is augmented as necessary. Further advice can also be provided by the Greater London Archaeological Advisory Service (GLAAS) located within English Heritage.

We have the following comments on this section:

4.2 Landscape and visual amenity

We welcome the recognition of the contribution of historic landmark buildings to the landscape, and that this matter is highlighted under the key environmental issues.

We also note and welcome the references to the Registered Historic Parks and Gardens in the district. It may be worth noting (if appropriate) that changes to river corridors can potentially impact on the significance of a registered park, if proposals to naturalise watercourses conflict with manmade interventions integral to the designed landscape.

4.6 Historic Environment

This section provides a useful summary of the heritage assets within the borough.

We suggest some minor changes:

- Registered parks and gardens could be identified by name here (second bullet, p19).
- There is a need to include reference to non-designated heritage assets. These might include locally listed buildings, but is likely to have most relevance in this context to unscheduled archaeology. We recommend that you contact the Greater London Archaeological Advisory Service to ensure that areas of high archaeological potential, or archaeological priority areas, are identified, and included in a map in this section.
- The map of conservation areas on p19 is helpful; we would recommend that it is revised to include all identifiable heritage assets, including listed buildings (and locally listed buildings if appropriate), registered historic parks and gardens, scheduled monuments and the extent of the identified areas of high archaeological potential
- We welcome the incorporation of information from the Heritage at Risk Register. There is a need to identify if this refers to the Borough's own register, or that published by English Heritage. In the case of the English Heritage register, this is an annual publication, and so we would recommend that you refer to the most up-to-date report which is 2013. The next report is published in October. If possible where the 'heritage at risk' status is clearly associated with flood risk, this should be identified.

The section on key environmental issues (p21) identifies important general issues. We suggest that the fourth sentence is amended at the end to '...could also have adverse effects, including indirect impacts on the setting of heritage assets'. If specific information is available from Conservation Area Appraisals or Management Plans for major heritage assets, such information could be added here. It would be suitable to refer to the need for archaeological assessment and mitigation where flood risk measures could affect areas of archaeological interest, or potential.

Table 6 SEA scoping summary, p26 – the content for the historic environment is generally appropriate. We suggest that there should be reference to opportunities to protect and enhance all heritage assets, including major sites.



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