

## Response ID ANON-ZWFX-JK7E-Z

Submitted to **Improving our management of water in the environment**

Submitted on 2019-03-12 17:53:51

### Introduction

#### 1 What is your name?

**Name:**

Hannah Fluck

#### 2 What is your email address?

**Email:**

hannah.fluck@historicengland.org.uk

#### 3 If you are responding on behalf of an organisation, please add their name below.

**Organisation:**

Historic England

#### 4 Would you like your response to be confidential?

No

If you answered yes to this question, please give your reason:

### Impacts of measures

#### 5 Do you have any specific evidence that you think could assist Defra in our assessment of the costs, benefits or other impacts of these possible measures? If yes, please provide details.

**Open text box:**

Yes. Historic England maintain a number of relevant data sets including the National Heritage List for England, it is also important to consider local Historic Environment Records (not maintained by Historic England but by local authorities).

### Water Resources Management Plans

#### 6 Do you agree that the Secretary of State should be able to direct companies to plan on a regional and inter-regional basis?

Yes

**Please provide reasons below:**

Provided the impacts of these plans are considered.

#### 7 Do you agree that the Secretary of State should be able to direct water companies to take account of abstractors' needs?

Yes

**Please provide reasons for your answer:**

Considering the impact on the environment as a whole is important, this includes the historic environment. Wetlands and waterlogged deposits can include archaeological remains that are extremely sensitive to changes in water level. From a historic parks and gardens perspective, we witness and foresee problems with irrigation water supply and waterlogging; public safety issues about water quality and algal blooms, and dams on large lakes and costs of repairs and conservation challenges of works. In urban areas, we are seeing inappropriate sustainable drainage schemes being forced into historic parks. Urban green space has an important water run off role and the first priority is to improve permeability and if SuDS installations are needed the design needs to respond to the site.

#### 8 Do you agree that the water resources management planning process should be recognised in legislation as a measure to deliver environmental objectives?

Yes

**Please provide reasons:**

Yes, but these objectives should also include the historic environment (as recognised in the 25 year environment plan ).

#### 9 Do you agree with our proposals to improve the legislation governing Water Resources Management Plans?

Yes

Please provide reasons:

**10 Do you have any further suggestions about how we could improve the primary legislation that governs water resources management planning? These could be either administrative improvements, such as how confidential information is dealt with, or to achieve better water resources outcomes. Please provide reasons for your suggestions.**

Open text box:

## **Drainage and Wastewater Management Plans**

**11 Do you agree that Drainage and Wastewater Management Plans should be made statutory and produced every 5 years?**

Don't know

Please provide reasons:

**12 Who should a water company consult with, and obtain information from in developing their Drainage and Wastewater Management Plans and at what stage in the development of their plans?**

Open text box:

It is important to make much better use of old knowledge (learn from the past): to understand the historic ways water was managed, and the long-term implications of altering these (eg village ponds, probably put there to provide a water sink, have been covered over and used for housing - which naturally then floods all the time). Historic Environment Information often held locally in Historic Environment Records can be helpful here. Historic England should also be consulted. This consultation should occur at an early stage so that the information can inform decision making.

**13 What, if any, are the lessons we could use from the Water Resources Management Planning process in making Drainage and Wastewater Management Plans statutory?**

Open text box:

**14 Is the current non-statutory Drainage and Wastewater Management Plan framework clear and complete, and are there any changes/lessons learnt which we should take on board in making the process statutory?**

Open text box:

**15 Should there be government or regulator oversight in the Drainage and Wastewater Management Plan process and review of plans? What level and type of oversight should this be?**

Please provide reasons:

Yes, of course; and they should have the ability to react to problems as they arise and support good practice that considers the environment as a whole.

## **Water Abstraction**

**16 Do you agree that the Environment Agency should be able to vary or revoke any licence that is causing unsustainable abstraction without paying compensation?**

Yes

Please provide reasons:

**17 Do you agree with our proposal to link unsustainable abstraction to various environmental duties as set out in this consultation?**

Yes

**If you answered no, how would you determine what constitutes unsustainable abstraction and why?:**

'environmental damage' should also include harm to the historic environment

**18 Should the Environment Agency be able to vary under used licences in the case of unsustainable abstraction to remove the underused portion, with suitable safeguards to protect necessary headroom?**

Don't know

Please provide reasons, including possible safeguards you consider appropriate.:

**19 Should the Environment Agency also be able to vary under used licences where there is unmet need for additional water in the catchment, to remove the underused portion, with suitable safeguards to protect necessary headroom?**

Don't know

Please provide reasons, including possible safeguards you consider appropriate:

**20 Should the Environment Agency be able to change any under used licence once necessary headroom is taken into account, irrespective of proportion of under use?**

Don't know

If you answered no, what proportion of under use is appropriate?:

**21 What do you consider is the appropriate length of time for a licence to be under used before the Environment Agency could use this power?**

Please provide reasons:

**22 Do you think anything more is needed in primary legislation to deliver the aims of the Abstraction Plan?**

Please provide reasons:

### **Land Drainage: Internal Drainage Board Charging Methodology**

**23 Do you agree that the Land Drainage Act 1991 should be amended to enable a new charging methodology to determine special levies?**

Don't know

Please provide reasons:

**24 Do you agree that the Land Drainage Act 1991 should be amended to enable a new charging methodology to determine drainage rates?**

Not Answered

Please provide reasons:

**25 Do you agree with the list of provisions that the alternative methodologies could include?**

Don't know

Please provide reasons:

**Should anything else be taken into account? :**

Needs to also include the Historic Environment

**26 With regards to both these methodologies what could the impact of provisions (a) and (b) be and are there any issues that government should take into account before making the regulations?**

**Open text box:**

Historic Environment and Heritage Value

**27 Should the new charging methodologies include exemptions for existing Internal Drainage Boards? For example the new charging methodologies could apply automatically to all Internal Drainage Boards, or existing Internal Drainage Boards could remain on the existing charging methodologies or could decide between the new or the old charging methodologies.**

Don't know

### **Flood and Coastal Erosion Risk Management: Raising local funds**

**28 Do you agree that there is a need for new or modified powers or mechanisms to raise additional local funding to manage local flood and coastal erosion risk management risks?**

Yes

Please provide reasons:

**29 Do you have any views on how best additional local funding can be raised fairly to better manage these risks and which existing public body is best placed to take on this function?**

**Open text box:**

**30 Do you support legislating to enable the Somerset Rivers Authority to be formalised (as a flood Risk Management Authority with precepting powers)?**

Not Answered

## **Modernising the process for modifying water company licence conditions**

**31 Do you agree with the case for modernising the way in which Ofwat modifies licence conditions?**

Not Answered

**Please provide reasons:**

**32 Do you agree with the proposal to base a modernised model on that currently used within the energy sector?**

Not Answered

**Please provide reasons:**

**33 Have you any other suggestions for a different model for licence condition modification?**

Not Answered

**If yes, please provide reasons and explain what this could be:**

**34 Do you agree with the proposal to modernise Ofwat's information gathering powers?**

Not Answered

**Please provide reasons:**

**35 Do you agree with the proposal to modernise the way in which documents can served, to include email?**

Not Answered

**Please give reasons, including any groups of people or type of documents for which email is not appropriate:**

## **Consultee Feedback on the Online Survey**

**36 Overall, how satisfied are you with our online consultation tool?**

Neither satisfied nor dissatisfied

**Please give us any comments you have on the tool, including suggestions on how we could improve it. :**