

# Improving our management of water in the environment

The  
Heritage  
Alliance

12 March 2019

The Heritage Alliance is England's largest coalition of independent heritage interests. We unite over 130 organisations which together have over 7 million members, volunteers, trustees and staff. The vast majority of England's historic environment is owned, managed and cared for by Heritage Alliance members.

The Heritage Alliance has responded to relevant questions in [the consultation](#) below:

**The Heritage Alliance is not responding to question 1.**

**Question 2: Do you agree that the Secretary of State should be able to direct companies to plan on a regional and inter-regional basis? Please provide reasons.**

Yes. We believe that this would lead to greater transparency and integration in the water management process across the country.

**Question 3: Do you agree that the Secretary of State should be able to direct water companies to take account of other abstractors' needs? Please provide reasons.**

Wetland habitats are fragile and vulnerable to changes. Impacts on wetland habitats can have a further impact on the environment (both natural and historic), as these sites are of archaeological and environmental significance.

We are pleased that the 25 Year Environment Plan sees the natural and historic environments as integrated and inseparable, and giving parity of approach to both. This view should permeate Government action on environmental issues, including those linked to water management.

Other abstractors need to recognise the significance of such assets. The Secretary of State should therefore be able to direct water companies to take account of other abstractor's needs, to ensure that there is a consideration of the possible impact that their actions may have on the wider environment.

**Question 4: Do you agree that the water resources management planning process should be recognised in legislation as a measure to deliver environmental objectives? Please provide reasons.**

Yes. Better management and planning for drainage networks should help to protect the environment and in turn would help to preserve heritage assets.

We agree with the suggestion of an amendment that would require companies to plan at a regional level. Decisions surrounding water management should be made on a broader scale, ensuring that the different needs mentioned are taken into equal consideration in long-term planning.

Flooding and drought have become increasing concerns for some heritage sites, so it is important that the water resources management planning process be recognised in legislation as a measure to deliver environmental objectives. This legislation should, however, as mentioned in our answer to Question 3, see the historic environment as integrated and inseparable with the natural, and treated on an equal footing (not a lesser one) in decision-making.

**The Heritage Alliance is not responding to questions 5-7.**

**Question 8: 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?**

We support Natural England's recommendation that they should be consulted on environmental grounds.

Historic England should also be consulted.

**The Heritage Alliance is not responding to questions 9-12.**

**Question 13: Do you agree with our proposal to link unsustainable abstraction to various environmental duties as set out in this consultation? If not, how would you determine what constitutes unsustainable abstraction and why?**

We support a proposal to amend the definition of unsustainable extraction to include provision for conserving biodiversity in line with the NERC Act. As wetlands are to be viewed as historic landscapes of international importance, a key goal of the proposals laid out in this consultation should be to conserve and enhance the landscape, including a conservation of historic assets.

Indeed, DEFRA includes specific examples of "field boundaries (such as hedgerows and dry stone walls), and monuments, buildings and sub-surface archaeological features which contribute to the landscape" in a definition of the 'landscape'.

**The Heritage Alliance is responding to no further questions.**