



Ms Emily Park
The Planning Inspectorate

Direct Dial: [REDACTED]

[sent electronically]

Our ref: PL00791744
16 December 2022

Dear Ms Park

RIVER THAMES SCHEME (NSIP)

Thank you for contacting us regarding an EIA scoping opinion in relation to the above development. On the basis of the latest information about the proposals, detailed below, we offer the following advice.

The proposals concern the construction of a relief channel to offset flooding of the River Thames between Egham and Teddington. The construction of a relief channel has been agreed as a result of extensive studies led by the Environment Agency, who have concluded this is the preferred approach to flood risk management in the Lower Thames Area.

The proposed River Thames Scheme would be a major new piece of green and blue infrastructure which integrates a new flood channel with new public open space, associated recreational infrastructure and environmental enhancements.

The scoping report, and our assessment of the project proposal, indicates that the development has the potential to impact upon both designated and non-designated heritage assets and their settings, both within the boundary of the development area itself and in the wider area surrounding it. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

General comments

Designated heritage assets and setting

Given the scale of the development and distance across which it spans, there will be likely visual impacts across a wide area and could, as a result, affect the significance of heritage assets not only in the immediate vicinity, but those at some distance from the development area itself.



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It is noted that a study area was agreed between Historic England and the applicants for the Setting Study produced in 2018 - which was to be greater than 500m established for the two DBA's. As such the eventual Environmental Statement should encompass all areas to which the presence of the project might make a change to the setting of heritage assets and historic landscapes. This will mainly align to the extent of Zones of Theoretical Visibility (ZTVs) relating to Heritage Assets and Key Views.

It is important that the assessment is designed to ensure that all impacts are fully understood. Techniques such as photomontages and computer-generated views analysis imagery are a useful part of this. This would be particularly important as there needs to be an understanding of the impact on the setting of the Scheduled Monuments and listed buildings affected, as well as the character and appearance of Conservation Areas, and Parks and Gardens of Special Historic Interest. It will be important that the setting of heritage assets is fully understood and also the contribution the setting makes to the significance of the assets. In this respect an analysis of the views from within, out of, and across the areas affected will be vital.

With regard to designated heritage assets there needs to be an understanding of what makes these assets 'special'. Significance can be harmed or lost through alteration or destruction of the heritage asset or through development within its setting, so it needs to be demonstrated how this proposal would impact on character and significance. An integrated approach to assessment will be required for this project that demonstrates an understanding of how all the individual elements of the historic environment come together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the areas affected, and the assets within them.

Non-designated heritage assets

The Environmental Statement will need to fully consider the potential impacts of the development on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

We note in particular the high probability for the discovery of non-designated archaeological remains within the development areas that cross previously undeveloped land. If any such remains were discovered that directly related to designated heritage assets, they may be deemed to be of equal significance to those protected by national designation. We note in particular the high potential for the discovery of prehistoric archaeological remains on the gravel terraces of this area.

It will be for the conservation officers and archaeological advisors based at or working for the relevant Borough Councils and Surrey County Council to provide further advice



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and commentary in relation to this. The two exceptions would be the Greater London Archaeological Advisory Service (GLAAS) and the Regional Archaeological Science Officer (in relation to geoarchaeological matters), both based at Historic England. Their specific comments are included below.

It is noted that a great deal of exemplary work has been undertaken on this scheme in order to assess and evaluate the potential and significance of this stretch of the Thames floodplain.

The DBA and cultural heritage chapter are generally comprehensive. The work has been geoarchaeologically-led, which has been required given the floodplain location and potential for relatively deeply buried archaeology and palaeoenvironmental remains within natural alluvial / fluvial sediments. It has shown that, outside of former aggregates extraction sites, the buried deposits are likely to be rich in palaeoenvironmental and potentially also archaeological remains.

Specific comments

Designated heritage assets

Abbey Meads

This specific part of Chertsey has great historical importance as it would have formed part of the wider Chertsey Abbey estate. The scheduling boundary of the Abbey reflects the core of the monastic site; however, the estate extended well beyond this (arbitrary) boundary, incorporating much of the surrounding landscape to provide support for the Abbey in terms of farming, industry, and trade. This is demonstrated for example, by the medieval ridge and furrow to the north of the core Abbey site which provides evidence of cultivation, and the presence of Abbey Mills which is separate from the main Abbey site.

Water management is a particular feature of the Abbey site; the scheduled area contains important archaeological remains of fish ponds, moats, and other water management features, and the Abbey's location and connection with the River is therefore particularly significant.

It will be important therefore, for the EIA chapter to sufficiently characterise the archaeological resource in this area, and adequately reflect the historic connection of this area of land with the Abbey site.

Laleham Burway

The area defined as Laleham Burway includes a scheduled earthwork enclosure in the northern part of the site. The earthwork is the possible site of a temporary Roman





marching camp, which is evident from the uniform nature of the enclosure and the rounded corners. The location next to the River Thames may have been of strategic importance. It has also been suggested that it may have been a medieval stock enclosure given the proximity to Chertsey Abbey and the Abbey Meads.

As this area has been identified as a likely candidate for habitat creation, it will be important to adequately characterise the archaeological and heritage resource. An important part of this characterisation will be to understand more about the function and date of the scheduled monument, in order to fully understand what the impact of the proposals might be on the site - in particular, through development within its setting.

Historic Landscapes

We would reiterate the comments of the Planning Inspectorate that there needs to be further clarity on the differences of approach in the assessment of cultural heritage and the LVIA. The Environment Statement will need to clearly set out its method for assessing the impacts to historic landscape character and highlight where the more significant impacts would occur.

Transportation, Demolition and Lighting

We concur with the comments of the Planning Inspectorate that there is a lack of clarity on construction traffic routing (related to transportation of non-hazardous materials) and as such it is not possible to ascertain the effect this may have on the setting of heritage assets. We agree that the Environmental Statement should provide clear detail on the routes for construction traffic and address any potential impact (or not) on designated heritage assets.

We also agree that the Environmental Statement should assess whether the demolition of buildings or structures as part of the scheme would result in any harm to heritage assets or their setting.

The effects of any new lighting provided as part of the scheme (or associated works), on heritage assets, will also need to be considered within the Environmental Statement.

Significance Criteria

The Cultural Heritage section of the Scoping Report contains a 'significance criteria' and considers various magnitudes of change that could have a high through to negligible level of impact.

We are unclear as to the difference between the term "very minor", used in the "low"





category and “slightly” used in the “very low” category. We do not feel the distinction between the “low” and “very low” categories is meaningful and would request the removal of “very low” category.

Undesignated heritage assets

Greater London Archaeological Advisory Service (GLAAS) comments

We are pleased to see a thorough approach has been taken with regard to the updated Desk Based Assessment. However, the potential impacts from the works concerning the weir upgrades and fish passes are not clear. This will need to be addressed in the Environmental Statement.

The Archaeological Priority Area (APA) descriptions for a number of London boroughs have been updated in recent years and this should be referenced. Specifically, LB Richmond now deploys the tiered system for its APA's and this will need to be considered and incorporated into the assessments for the Environmental Statement - <https://historicengland.org.uk/content/docs/planning/apa-richmond-upon-thames-2022-pdf/>.

We would like to see the Teddington and Moseley sites scoped in going forward. We do not agree that the potential for Palaeolithic archaeology is low, as the scoping report suggests. We would also request that more information is provided about the impacts on industrial archaeology, such as the weirs and the sites of the hulks on the eyots.

Nationally important archaeology

We concur with the Planning Inspectorate's request that the Environmental Statement and any mitigation strategy should be clear in its approach to the discovery of archaeological remains that could be deemed of national importance. This should include a strategy for dealing with archaeology that should be preserved *in situ*.

Unknowns

It is not entirely clear which areas within the study area have been robustly assessed and evaluated and where / whether there are areas for which little is known. Previous evaluation work for the scheme is included with other past work in the 'events' sections (DBA, Section 5). This is reasonable but it would be helpful to see where we can be confident and where the baseline evidence remains uncertain. We are also not shown (on a figure) where the evaluation work to date has been done.

This links with the mapping of potential (DBA Figs 48 & 49 and section 11.5.3). We have concerns with the 'moderate potential/risk' category. We also note it is discussed





in 11.5.3 in terms of risk, not potential. However, the mapping shows potential. We do not feel that areas of unknown potential should be lumped together with areas surrounding those of high potential, as well as areas of high palaeoenvironmental potential and all classed together as of moderate risk / potential. We can see that they could all present a moderate level of risk, but the figures are mapping potential, not risk. By lumping different things together, makes it difficult to disentangle the different components of this category and in particular the areas of unknown potential.

This is important, as there should be an intention to target for evaluation any areas where the potential is unknown. We would like to see a figure where areas that have not been covered in the deposit modelling to date or by any form of fieldwork are identified and mapped as of unknown potential.

Waterlogged archaeological remains

No information is provided on how deep the evaluation trenching done to date has gone and/or whether trenching or test pits have adequately evaluated the potential for waterlogged archaeology in areas of high palaeoenvironmental potential. If evaluation of these deeper wet areas has been focused on boreholes and perhaps test pits, can we be confident that waterlogged archaeology does not survive?

Neither the DBA or cultural heritage chapter say much or make much provision for waterlogged archaeological remains. Waterlogged artefacts and structures of all periods are likely to be rare and important (even potentially nationally important).

Therefore:

- a) areas with waterlogged palaeoenvironmental preservation might be better mapped separately and the potential for rare but important archaeology to also exist in these areas flagged-up;
- b) an approach to mitigation of areas where the potential for deeply buried waterlogged remains has been identified should be outlined in the Scoping document, cultural heritage chapter. This is likely to require a different approach to the '*archaeological monitoring of construction excavations*', or the '*programme of geoarchaeological investigation and palaeoenvironmental sampling*', if this is reliant on boreholes (9.6.2.2). It might also need to be done in a controlled archaeological manner at the same time as construction work (to ensure access to deep deposits). Therefore, time should be allowed for this in the construction programme.

Palaeochannels

The DBA identifies the potential for a network of palaeochannels to preserve archaeological and palaeoenvironmental information (7.3.1 - 7.3.4; 7.45). It needs to be emphasised here and in the Potential section (11.3.2), as well as in 10.1.1 and



10.2.1 (and elsewhere), that these will not all be features with surface expression. As well as the palaeochannels mapped through lidar interpretation, palaeochannels could also be buried at depth and no longer be visible at the ground surface.

Therefore in 7.4.6 (*Implications of the Geoarchaeological Record for the Study Area*) it should be made clear that any impacts into floodplain deposits, not just into palaeochannels identified through lidar, need prior geoarchaeological assessment to ascertain depth and character of buried deposits and the potential for palaeochannels buried at depth.

This point also links to the need for deposit modelling to be threaded through the archaeological mitigation (Scoping document, cultural heritage chapter, 9.6.2.2, see below).

Skulls

DBA paragraph 7.4.7 discusses the skull assemblages from the Thames and its tributary channels. Firstly, because the current channel probably did not exist in the Bronze Age and Medieval periods, it should be noted that such skulls might also be associated with the palaeochannels. However, secondly, it is surely likely that the Thames skulls may have been eroded and redeposited like those in the Walbrook.

A geoarchaeological assessment taking account of landscape and taphonomic processes would be appropriate should such skulls be recovered as part of archaeological work.

Deposit modelling

It is not clear from the DBA where there is deposit modelling at sufficient resolution to provide confidence in our understanding of deposit character, sequence, distribution, potential and significance of the buried deposits. Likewise, we are not told where we do not yet have good data coverage. (See point above about mapping unknowns).

DBA paragraph 7.4.9 notes the potential for islands of higher ground to exist within the floodplain and their significance for past human activity. This emphasises that detailed deposit models, building on those already constructed for the scheme need to be constructed for any areas of impact, to inform any further evaluation and mitigation. The deposit models should be updated following fieldwork and be used to inform post-excavation and to feed into publication and wider sharing of the project findings.

This need for deposit modelling to be threaded through the approaches to mitigation should be included in the Scoping document Cultural Heritage chapter, 9.6.2.2.

Thames Gravels



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For both the Spelthorne and Runnymede channels Table 21 (*Potential, significance and impact on heritage assets*) identifies potential for palaeoenvironmental and archaeological remains associated with “*Any intervention in to the Shepperton Gravels, Langley Silt and identified palaeochannels*”. Although we agree with regard to Palaeochannels, we question this in relation to Shepperton Gravels and Langley Silts. These are both Pleistocene deposits and have (some, limited) potential for Palaeolithic remains.

Linked to 10.2.4 and 10.1.2, we would question what is meant by “*a moderate level of potential for the discovery of artefacts within the Thames gravels from the Palaeolithic period onwards*”? The Thames gravels were deposited in the Pleistocene so might contain Palaeolithic remains (only; and these are likely to be few and far between). However, the surface of the gravels - at the interface with the overlying alluvium could have potential for Late Upper Palaeolithic, Mesolithic and later prehistoric remains... is this what the text is implying? It needs to be explained more clearly.

Recommendation

We urge you to address the above issues and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance. If you have any queries about any of the above, or would like to discuss anything further, please do not hesitate to get in contact with us.

Yours sincerely,

Iain Bright
Inspector of Ancient Monuments

cc: Richard Woodward, Olivia Merritt, Jane Corcoran, Louise Davies

