

Rob Ellis
Environment Agency
21/24 Millbank
London
SW1P 4XL

24th January 2011

Dear Rob,

Consultation on Draft Scheme of Membership for Regional Flood and Coastal Committees (RFCCs)

Thank you for consulting English Heritage on the above. English Heritage is the Government's advisor on all aspects of the historic environment in England. Although sponsored by the Department for Culture, Media and Sport (DCMS), which has overall responsibility for heritage policy in England, English Heritage works closely with other Government Departments responsible for planning, the environment, housing, transport and the constitutional framework within which most decisions affecting the historic environment are made. The National Heritage Act (2002) enabled English Heritage to assume responsibility for maritime archaeology in English coastal waters, modifying our functions to include securing the preservation of ancient monuments in, on, or under the seabed, and promoting the public's enjoyment of, and advancing their knowledge of ancient monuments, in, on, or under the seabed.

We support the general direction of Defra's proposals for the new RFCCs and, consequently, will not respond to most of the consultation questions. However, there is one issue that needs raising, in relation to:

Question 8. Are there any specific skills missing from the list above which should be included? If so, please explain why.

In section 1.2 under 'General Membership Conditions' it is stated that each RFCC will include "One member to be the representative of nature conservation" and in 3.1 under 'Environment Agency Appointees' one member with skills and experience in "environment and conservation" is included. There is no specific mention of the **historic** environment or its conservation in terms of either lead members or Environment Agency appointees. We understand that there is a need to limit the size of the RFCCs, but the apparent omission of historic environment considerations is a serious one.

FCERM strategies and schemes frequently have adverse impacts on archaeological sites, historic buildings and structures and historic landscapes (historic assets). Mitigation of these impacts is generally achieved through the planning system (via PPS 5) or the EIA process. In the case of designated historic assets (such as Scheduled Monuments and Listed Buildings) there are legal obligations to seek consents for any activities that might impact them. Having historic environment expertise on the RFCCs would be essential to identify impacts and responsibilities at an early stage and, more positively, to help ensure enhancement of the historic environment of the area of each RFCC's responsibility.

We therefore propose that the wording for the EA appointee's skills and expertise in 3.1 should be changed from "environment and conservation" to "natural and historic environment conservation". We would be pleased to discuss how this expertise could be provided.

Yours sincerely,

Peter Murphy
Coastal Strategy Officer

cc. Alison Baptiste, Jen Heathcote, Steve Trow

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