

M. Cox,  
FCERM Strategy Team,  
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Bristol BS32 4UD.

14<sup>th</sup> February 2011

Dear M. Cox

**Reducing the threat, building resilience, empowering communities.  
Consultation on a National Flood and Coastal Erosion Risk Management  
Strategy for England; and Strategic Environmental Assessment report.**

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.

**National FCERM Consultation**

**General comments**

We consider that there is confusion of terminology between 'cultural heritage' and 'built environment', though 'historic environment' is used sometimes. Cultural heritage tends to be referred to separately, and with lesser emphasis, than 'environment'. We suggest that 'environment', where used, should be 'natural and historic environment', except where it is obviously referring to the natural environment exclusively.

**Specific comments**

***Consultation overview.***

p. 6. Bullet point at bottom of page and overleaf. English Heritage should appear here.

***Consultation***

p.3. First bullet point. English Heritage, as the government advisor for the historic environment, should appear here alongside or instead of the National Trust, which is a charitable organisation.

p. 4. 2.1 Overview, lines 11-12. Change “environment and cultural heritage” to “natural and historic environments”.

p. 9. Bullet point 5 and p.11 Multiple Benefits, lines 2-3 and 10. Change to “natural and historic environments”.

p.12. Understanding Risks. An addition to bullet point 3 is required. “Specifically, the Environment Agency should provide active support and data sharing for other organisations engaged in Risk Assessment exercises (e.g. the EH Coastal Estate Risk Assessment (CERA)).

p.13. Planning Risk Management. Line 7. Add “or conservation of the historic environment.”

p. 21. Planning Risk Management. 5<sup>th</sup> bullet point. The register of assets must include Listed Buildings, Scheduled Monuments and other significant (especially designated) historic assets.

p. 25. Section 5. This section on funding obviously has major implications for any coastal landowner or manager, including English Heritage. The new emphasis on local partnerships obtaining or contributing funds for local FCERM schemes, where they are not of sufficient priority for central government funding, may well affect EH in the longer term. Continuing dialogue is necessary.

p. 27. 2<sup>nd</sup> bullet point. “internationally designated environmental features” must include World Heritage Sites.

p. 28. 5<sup>th</sup> paragraph, beginning “A protocol ...” I, and colleagues in English Heritage are not aware that we have been approached to contribute to either protocol. We would be pleased to contribute.

#### *Consultation questions.*

- 1. Is there any additional information on risk that should be considered?**  
Risk Assessments by other organisations provide additional information on risk, e.g. the English Heritage Coastal Estate Risk Assessment (CERA), currently in preparation.
- 2. Are there any other additional aspects of risk that need to be assessed?**  
The historic environment in general.
- 3. The strategy takes into account different sources of risk. How can they best be quantified in a way that helps the assessment of the relative importance of these risks?** Direct comparison is difficult, since coastal erosion (though on a smaller scale overall) results in total loss of assets, whereas damage from flooding is usually reparable.

4. **Do you agree with the proposed overall aims of the strategy?** Yes.
5. **Are there any additional goals that should be included?** There should be more proactive support for organisations undertaking their own Risk Assessments and guidance on how best to develop risk management strategies.
6. **Are there any other guiding principles for FCERM that you would include?** So long as the term “natural and historic environments” is used consistently, no.
- 10a. **How should the relative risks to people, property and business be taken into account?** This must not be entirely economically based. ‘Intangible assets’ such as historic assets must be considered.
- 10b. **How should the risks to people, property and business, and improving and protecting the environment and habitats be balanced?** Again, this must not be purely economically based.
- 11b. **What is the best way to quantify ... additional benefits and how should they be considered in FCERM decisions on priorities and funding?** Multi-criteria analysis seems a fruitful way forward.
12. **How may the current arrangements for emergency response be improved?** So far as organisations are concerned, a direct approach to their CEOs and senior managers would be helpful. Local managers may not have the capacity to respond.
13. **Are the responsibilities of the key organisations clear?** Yes.
14. **Do you agree with the overall objectives for the proposed changes to the funding system as set out above? If not, please can you explain your answer?** Where nationally designated assets are affected consideration must be given to the capacity of organisations to contribute financially to their maintenance. The development of local partnerships might go some way towards ameliorating short-falls of funding, but in some cases supporting funding from the EA might be required.
19. **Should reports on the implementation of the national strategy assess progress against specific milestones and activities? If so, what should these specific milestones and activities relate to?** One significant milestone must be numbers of nationally designated historic assets protected.

#### **Co-operation between authorities and requesting information**

Since this is directed primarily at the Environment Agency, Local Authorities, IDBs, water companies and highway authorities, concerned with flood and erosion management, English Heritage does not have a formal remit to comment here. However, historic environment data obtained during the English Heritage Rapid Coastal Zone Assessment Survey programme has been transferred to Local Authorities for incorporation into their Historic Environment Records and hence the relevant authorities (as defined in Annex A) will already have access. However, section 6 indicates that occasions might arise where a risk management authority might contact the National Monuments Record directly for information, and section 5.4 (Principles of good information requests) seems to cover that adequately.

English Heritage therefore has no responses to the consultation questions, although we wish to collaborate with the Environment Agency (NEAS) in the development of future guidance.

### **Strategic Environmental Assessment.**

#### *p. 3 2.2. Scoping of Environmental Issues*

This states: "Significant impacts on landscape and cultural heritage can result from FCERM measures. However, these are dependent on the location, the type of actions being undertaken, and sensitivity of the resources. Given this context we considered that it would be difficult to identify any effects on these issues that are significant at a national scale and it would be more appropriate for these to be 'passed down' to be assessed at a more appropriate level where actions to be taken in specific locations can be identified."

English Heritage is disappointed to see that, as a result of this 'scoping out', the historic environment and landscape are not considered in the SEA, in the Environmental Baseline (2.5, p. 6), the Assessment (3, p. 13) or Significant Environmental Effects of the draft National FCERM Strategy. It seems possible that this arose since those developing the SEA were unable to find national statistics.

Heritage assets at risk from erosion or flooding on the coast are being identified as part of the English Heritage *Rapid Coastal Zone Assessment* survey programme, the vast majority of which not designated as Scheduled Monuments or Listed Buildings. The data obtained are transferred to the National Monuments Record and Local Authority Historic Environment Records, where they are available to inform planning decisions. Until this survey programme is completed a national assessment of the thousands of designated and undesignated historic assets at risk will not be possible. However, considering just English Heritage properties and guardianship sites, 23 properties are contiguous with mean high water and 80 lie within the 'coastal zone' as defined by Natural England (2007). Besides being of national cultural significance, these properties make significant contributions to local economies by attracting visitors and tourism. 56 of them have been selected for more detailed assessment as part of the EH Coastal Estate Risk Assessment, for they, or their associated infrastructure related to access and visitor facilities, are at risk from erosion or flooding.

#### *Specific comments*

p. 5 Table 2.3. The theme for 'Landscape' is very limited and does not take account of the European Landscape Convention.

p. 26. Appendix 1: List of plans, strategies and legislation considered. There is no mention of the Ancient Monuments and Archaeological Areas Act 1979, Protection of Wrecks Act 1973, Town and Country Planning Act 1990, National Heritage Act 2002 or the European Landscape Convention.

Yours sincerely,

Peter Murphy  
Coastal Strategy Officer

cc. Alison Baptiste, Ed Wilson, Jen Heathcote, Steve Trow, Adrian Olivier

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