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Consultation on Floods Funding Reforms
Flood and Coastal Erosion Risk Management
Defra
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22.2.11

Dear Sir

Future funding for flood and coastal erosion risk management (Consultation on the future Capital Grant-in-Aid allocation process in England) and Future funding for flood and coastal erosion risk management (Draft Technical Guidance).

Thank you for consulting English Heritage on the above draft guidance. I apologise for our late response. I will send a hard copy to accompany this e-mail.

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.

English Heritage has viewed the consultation documents but considers that response to all the Consultation Questions would lie beyond its remit.

However, response is necessary to Questions 11 and 15 in the Draft Technical Guidance.

Question 11. Do you agree with these outcome measures for future periods? If not, which would you change or what others would you add? In OM1 (Value of long-term discounted economic benefits against the 'do nothing' scenario) examples of economic benefits are given, but there is no reference to historic assets, which should be included. Of the 411 properties for which English Heritage is responsible 80 fall within the Coastal Zone (as defined by Natural England) and of these 54 are considered to be at risk from erosion or flooding. Currently, English Heritage is undertaking a Coastal Estate Risk Assessment to quantify and characterise risk at these sites. Quantifying economic values for historic assets is problematic. However, a recent report (*Measuring the value of culture: a report for the Department for Culture Media and Sport*, 2010) recommends that the economic valuation techniques supported by HM Treasury's Green Book should be used. Pending development of methodologies for valuation in this way it is plain that historic assets have demonstrable economic benefits and values, both in terms of their intrinsic

insurance or 'market' values and in terms of attracting tourist revenue. Consequently, historic assets in the care of English Heritage and other organisations such as the National Trust must be given particular attention during the calculation of OM1 values.

Question 15. Do you have any other comments and suggestions on how prioritisation and funding allocation should work?

FCERM schemes may deliver benefits, not just to households, businesses and infrastructure, but also to other national assets which Agencies and other bodies manage, principally on behalf of Government. Cases in point would be historic properties for which English Heritage is responsible. We consider that there is a need for discussion between Government departments on financial responsibility for maintenance of flood and erosion defences at assets of this type.

Yours Faithfully,

Peter Murphy

Coastal Strategy Officer

Cc Annabel Houghton, Steve Trow, Jen Heathcote, Adrian Olivier, Alison Baptiste

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