

# Response ID ANON-ZVPN-5QGW-J

Submitted to Reforming our approach to floods funding  
Submitted on 2025-07-28 18:49:31

## Contents

## Foreword

## Executive Summary

## Part 1: Our new strategic vision for investment in flood resilience & coastal erosion in England

## Part 2: Response guidance

1 Would you like your response to be confidential?

No

2 If you answered yes to Question 1, please give your reason(s)

Free text box:

3 What is your full name?

Free text box:

Antony Firth

4 What is your email address?

Free text box:

antony.firth@historicengland.org.uk

5 Who are you responding as? (Select one option only)

other

6 If you answered a 'local authority', an 'environmental group', an 'insurance company', a 'water or sewerage company' or 'other' in Question 5, please specify.

Free text box:

## Part 3: Changing our approach to funding flood and coastal erosion projects

7 To what extent do you agree with our overall proposed approach to funding FCERM projects as set out in Part 3?

Not Answered

8 Please explain your answer to Question 7.

Free text box:

9 Are there any other approaches to funding flood projects you feel would be effective?

Free text box:

10 You will now be asked about the three principles in turn. To what extent do you agree that Principle 1 - the first £3 million of eligible project costs to be notionally provided by Defra through a Contribution Free Allowance - described in Part 3 is an appropriate way to fund FCERM projects. As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4).

Not Answered

11 Please explain your answer to Question 10.

Free text box:

12 To what extent do you agree that Principle 2 - a single basic rate of Defra funding to be 'notionally' applied to all new FCERM project costs above the £3 million Contribution Free Allowance, regardless of their outcomes - described in Part 3 is an appropriate way to fund FCERM projects. As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4).

Not Answered

13 Please explain your answer to Question 12.

Free text box:

14 To what extent do you agree that Principle 3 - All FCERM refurbishment projects are fully funded (refurbishment projects are those that restore existing assets that have fallen below designed levels of operation or are at the end of their design life) - described in Part 3 is an appropriate way to fund FCERM projects. As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4).

Strongly Agree

15 Please explain your answer to Question 14.

Free text box:

Historic England supports the refurbishment of buildings and structures to support net zero commitments. Some FCERM assets are also heritage assets, so we especially welcome refurbishment projects that help safeguard the significance of those assets as well as their FCERM objectives. Where FCERM assets are also heritage assets, we encourage early consultation with heritage specialists who can help ensure that the multiple benefits of refurbishment can be delivered from the outset. Please note that where FCERM assets are designated under heritage legislation, then refurbishment projects are likely to require additional consents: again, seeking early advice can help avoid delays in refurbishment activities. Given that FCERM assets can also be heritage assets, we would strongly encourage Defra to ensure that FCERM asset registers integrate heritage data: Historic England would be very pleased to collaborate on this matter and to assist.

16 Do you agree Property Flood Resilience (PFR) (resistance measures), as described under 'Other considerations' in Part 3, is an appropriate option to include in government funded flood risk mitigation?

Strongly Agree

17 Please explain your answer to Question 16.

Free text box:

Historic England supports the use of appropriate resistance and resilience measures for historic and traditionally constructed buildings (<https://historicengland.org.uk/advice/your-home/flooding-and-older-homes/being-prepared-for-flooding/>).

In collaboration with the Environment Agency, training and guidance is being produced that recognises the differences between traditional and modern construction, to ensure clear recommendations for products based on a building's risk, typology and its main construction material. This is imperative to ensure that inappropriate materials and workmanship do not result in maladaptation (undermining the building's performance and resilience to climate change) or unintended consequences (causing harm to the significance of the building, its fabric or its occupants) (<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/traditional-buildings-and-energy-efficiency/properties-of->

Resilience and resistance measures have been the focus of funding and government support, whereas adaptation appears primarily to be undertaken by private individuals. However, we feel that it is important to recognise that adaptation will be the only option in some circumstances otherwise properties will end up become repeatedly flooded, lost entirely due to coastal erosion, or become stranded assets particularly where mortgage lenders identify them as high risk (<https://www.bloomberg.com/news/articles/2024-04-30/uk-s-nationwide-pulls-mortgage-offers-to-homes-at-flood-risk>).

Types of adaptation were discussed in a Historic England Technical Tuesday webinar (<https://historicengland.org.uk/services-skills/training-skills/training/webinars/recordings/webinar-on-adapting-to-flooding/>). Adaptation does not have to focus purely on reducing the impact of flooding but can also provide opportunities for reducing other climate change hazards such as water scarcity and water pollution.

Though funding from government for 'Build Back Better' and Property Flood Resilience (PFR) is available, there is still a percentage of buildings that fall out of scope and receive no funding or support. This includes commercial buildings, and generally listed buildings or those of traditional construction, particularly timber-framed or cob.

Historic England is currently working with the Environment Agency to ensure that the products and methods offered as part of PFR are appropriate for both traditional and modern construction. However, this still needs to be embraced within the wider flood sector, and to encourage insurance firms to use appropriately knowledgeable and skilled workers on traditionally constructed buildings. This is important to ensure that property owners are provided with accurate information and support. This could be achieved by continued joined-up thinking and collaboration across the sector, government departments and accredited organisations (such as RICS or the Institution of Structural Engineers (IStructE)) to ensure that skills and knowledge are improved.

Historic England would be happy to support government by further collaboration to ensure that funding schemes support a wide range of buildings or all

ages, whilst ensuring that the materials, workmanship and methods are appropriate for that building specifically.

18 Do you think that the overall proposals for funding flood and coastal erosion projects will support the right amount of natural flood management? Are there other proposals you think we should consider?

Don't know

19 Please explain your answer to Question 18.

Free text box:

Although the changes will likely benefit NFM, it is difficult to determine whether it will support 'the right amount'. Historic England believes that whatever support is provided to NFM, NFM will be more effective if it is informed by an understanding of the historic environment. Many aspects of flooding are related to historic interventions and management practices in watercourses, floodplains and coastal areas – often stretching back many centuries. These systems are not 'natural' so NFM measures are unlikely to be fully effective (and may even be counterproductive) if the long history of human factors is not understood alongside natural factors. Put simply, learning from the past can improve the effectiveness of future responses. Although the £25M NFM programme is welcomed, it appears not to have engaged with this fundamental aspect of the historic environment: we would encourage Defra to examine the potential contribution of historic environment disciplines to the practical effectiveness of NFM and to provide guidance accordingly. Such an approach would be consistent with our joint statement with Natural England and the National Lottery Heritage Fund on Integrating Management of the Natural and Historic Environment (<https://historicengland.org.uk/content/docs/advice/joint-statement-naturalengland-historicengland-nlhf/>).

Further, we would encourage Defra to consider culture-based approaches to flood risk, drawing on the long history of communities living and working with water to inform adaptation and resilience today: this could have profound effects in the agricultural sector and in communities coping with transition to a more resilient future, for example.

We note also the suggestion that non-risk management authorities may be allowed to apply for flood investment for NFM. Historic England would welcome the opportunity for authorities with responsibility for heritage assets at risk from flooding and coastal erosion to apply for NFM funding either individually or in partnership.

Historic England would be very pleased to work with Defra, the Environment Agency and Natural England to improve the effectiveness of NFM by firmly rooting it in understanding the historic environment and the cultural dimensions of living with water.

20 Do you believe there are any benefits and/or challenges of the current 2012 rule that have not been identified in Part 3?

Free text box:

21 Do you think a similar provision to the '2012 rule' remains necessary under the new approach?

Free text box:

22 Please outline any potential effects of the proposals outlined in Part 3 on groups with a protected characteristic.

Free text box:

#### Part 4: Changing our approach to prioritising the delivery of flood and coastal erosion projects

23 Which of these options do you think that FCERM projects should be prioritised for delivery (select one)?

Bolstering projects that achieve priority outcomes (approach 2)

24 Please explain your answer to Question 23.

Free text box:

It is essential that both value for money AND bolstering specific policy outcomes take account of the economic, environmental and social value of heritage assets potentially benefitting from FCERM investment projects. Currently, the costs of addressing heritage assets may add to overall costs, but the wider economic, environmental and social benefits of doing so are not considered. This imbalance creates a perverse incentive, discouraging attention to heritage assets even though they may be a source of major benefits. By way of illustration, heritage assets (such as historic buildings, structures, gardens, landscapes, and archaeological sites) may be a key source of tourism income, contribute substantially to the character of places and make them attractive places in which to live and work: not including them within the scope of FCERM investment, or projects that are not sensitive to or detract from character or access, can reduce value or cause major dis-benefits. We feel strongly that a revised approach to value for money for FCERM investment should recognise the benefits of heritage in calculating Benefit Cost Ratios so that these benefits can be realised rather than being overlooked or unintentionally diminished. Equally, FCERM investment prioritisation should expressly recognise the contribution of heritage to bolstering policy outcomes for growth, resilience in deprived areas, and support for rural, agricultural and coastal communities. Methods of recognising the cultural and societal value of heritage consistent with Green Book requirements are set out in DCMS guidance Embedding Cultural and Heritage Capital Approach in Decision-making

<https://www.gov.uk/government/publications/embedding-a-culture-and-heritage-capital-approach/embedding-a-culture-and-heritage-capital-approach>. This is complementary to and entirely compatible with Natural Capital Accounting. Historic England would be happy to work further with EA and Defra on improvements to prioritisation.

25 Please rank in order of preference the 5 potential outcomes that could be prioritised through prioritisation Approach 2: (with 1 being the highest preference and 5 being the lowest preference):

Please rank in order of preference the 5 potential outcomes that could be prioritised through the new Floods Investment Framework (with 1 being the highest preference and 5 being the lowest preference): - Supporting economic growth and the wider economy:

Please rank in order of preference the 5 potential outcomes that could be prioritised through the new Floods Investment Framework (with 1 being the highest preference and 5 being the lowest preference): - Deprived areas:

Please rank in order of preference the 5 potential outcomes that could be prioritised through the new Floods Investment Framework (with 1 being the highest preference and 5 being the lowest preference): - Specific types of flood resilience intervention, such as natural flood management:

Please rank in order of preference the 5 potential outcomes that could be prioritised through the new Floods Investment Framework (with 1 being the highest preference and 5 being the lowest preference): - Specific types of communities, e.g. rural or coastal communities:

Please rank in order of preference the 5 potential outcomes that could be prioritised through the new Floods Investment Framework (with 1 being the highest preference and 5 being the lowest preference): - Local choice:

26 Please explain your rankings in Question 25.

Free text box:

27 Are there any other outcomes we should consider prioritising through prioritisation Approach 2?

Free text box:

28 Please outline any potential effects of the proposals outlined in Part 4 on groups with a protected characteristic.

Free text box:

## Part 5: Transition arrangements

29 How confident are you that the transition arrangements described are sufficient to ensure continued delivery of projects nearing construction and/or projects already under construction?

Not Answered

30 Please explain your answer to Question 29.

Free text box:

31 Please outline any potential effects of the proposals outlined in Part 5 on groups with a protected characteristic.

Free text box:

## Part 6: Call for evidence on alternative sources of funding for flood risk management

32 To what extent do you agree with the four proposed principles guiding our work on alternative sources of funding (outlined in Part 6) – viability, fairness, sustainability and efficiency?

Neutral

33 If you disagree with any of the proposed principles in Question 32, please explain why.

Free text box:

34 To what extent do you agree with the five areas we are planning to explore to identify alternative sources of funding (outlined in Part 6) – insurance sector, water and sewerage companies, land and property value uplift, local funding and building on the existing system?

Neutral

35 If you disagree with any of the proposed areas in Question 34, please explain why.

Free text box:

Although not disagreeing, Historic England believes it is important that Defra's exploration of the insurance sector should engage expressly with traditionally constructed buildings in support for the adaptation and resilience of buildings following a flood, including through the Build Back Better scheme (<https://www.floodre.co.uk/buildbackbetter/>).

Research undertaken by Aviva in 2023 calculated that the carbon footprint of restoring a flooded home was the equivalent of six and a half return

transatlantic flights

(<https://www.aviva.com/newsroom/news-releases/2023/02/carbon-footprint-of-restoring-a-flooded-home-can-be-equivalent-to-six-and-a-half-return-transatlantic-flights>)

In the UK, traditional construction will account for between 30-40% of the built environment by 2050. These buildings are inherently resilient to flood water and are able to recover where they have been treated with appropriate materials.

However, previous work by owners, insurers or loss adjusters often results in many traditionally constructed buildings having tanking, gypsum plaster and inappropriate renders installed that require wholesale removal after a flood. If treated with appropriate, traditional materials, such buildings would simply require drying out which requires less time (<https://historicengland.adobeconnect.com/pr1ve3zmoecs/>).

If insurers, loss adjusters and FloodRe were to support reinstatement of appropriate materials as part of insurance claims and Build Back Better, this would reduce post-flood impacts to properties and their occupants and owners, reduce financial costs, and lower carbon via wholesale replacement of materials; whilst also potentially incentivising funding from insurers to look at resilience and adaptation measures to reduce premiums and claims.

36 Are there any areas that you feel we are missing? Please explain your answer.

Free text box:

37 Please provide any further feedback on our proposed areas for alternative sources of funding (insurance sector, water and sewerage companies, land and property value uplift, local funding and building on the existing system), including any additional evidence you would like us to consider in support of your answers.

Free text box:

38 Please outline any potential effects of the alternative sources of funding work on groups with a protected characteristic.

Free text box:

## Part 7: Call for evidence on local choice, English devolution and opportunities for flood risk management

39 In your opinion, how can Regional Flood and Coastal Committees be empowered to deliver greater local choice in flood investment programme decisions?

Free text box:

40 What changes do you believe are needed to support and enable Regional Mayors to enhance partnership working with other organisations for flood risk management?

Free text box:

41 How do you believe Regional Mayors can enable integrated approaches to strategic flood planning? What changes are needed to achieve this and how can risks be managed?

Free text box:

42 In your opinion, how can Regional Mayors support or enhance governance arrangements for Local Flood Risk Management Strategies? What changes are needed to achieve this and how can risks be managed?

Free text box:

43 In your opinion, what are the risks and opportunities of devolving some of the flood funding budget to either local or mayoral authorities in the longer-term? How could risks be mitigated?

Free text box:

44 What changes do you believe are needed to enable and encourage Regional Mayors to consider flood risk management when making revenue raising and spending decisions?

Free text box:

45 Please outline any potential effects of the local choice, English devolution and opportunities for flood risk management work on groups with a protected characteristic.

Free text box:

## Part 8: Consultee Feedback on the Online Survey

46 Overall, how satisfied are you with our online consultation tool?

Satisfied

47 Please give us any comments you have on the tool, including suggestions on how we could improve it.

Free text box:

Annex A: Partnership Funding policy Summary

Annex B: Glossary