

THE ARCHAEOLOGY FORUM

a grouping of independent bodies concerned with archaeology

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25 September 2009

Dear Coastal Erosion Team,

DEFRA CONSULTATION ON COASTAL CHANGE POLICY

Thank you for this opportunity for The Archaeology Forum to respond to Defra's consultation on coastal change policy.

The Archaeology Forum is a grouping of the key, non-governmental organisations concerned with archaeology in the UK. Its members include the Association of Local Government Archaeological Officers UK, the Council for British Archaeology, the Institute of Conservation, the Institute for Archaeologists, the National Trust, the National Trust for Scotland, Rescue, the Society of Antiquaries of London, the Society of Antiquaries of Scotland, the Federation of Archaeological Managers and Employers, and the Society of Museum Archaeologists UK. This Forum response brings together comments on key issues from members. A number of organizations are also making responses to this consultation in their own right.

We welcome this consultation on how coastal communities can successfully adapt to the impacts of climate change and the particular consideration that has been given to the historic environment in the section on managing change. The emphasis on local decision-making and community involvement is also commendable. Before addressing the specific questions in section 5. of the consultation, we would like to offer some general comments on the overall context for managing coastal change.

The Forum appreciates that this consultation does not include consideration of the Government's approach to investment in coastal defences and that Defra is producing a separate new policy statement on the appraisal of flood and coastal erosion risk management.

We are pleased to see (2.22) that this will also take into account ‘impacts that are too difficult to value in monetary terms’. We would like to emphasise the importance of including cultural heritage in the range of benefits and options that are assessed. Due weight should be given to heritage assets of high significance such as designated historic areas, landscapes, buildings and sites and indeed undesignated assets of equivalent significance. The Rapid Coastal Zone Assessment surveys (RCZAs, commissioned by English Heritage) can provide the basis for identifying such sensitive places, with local enhancement where required, and will provide an essential database for regional decision-making on risk management. The Forum welcomes the proposal to fund selected pathfinder projects with local authorities (3.3) and, again, would like to emphasise the importance of including historic environment impacts in the development of local solutions with communities affected by coastal change.

Understanding and documenting the heritage of a coastal community, even where the physical losses due to change may be unavoidable, can play a central role in the long-term process of building a vision for the future (4.4). Local amenity, history and archaeology groups are, we assume, embraced in the definition of ‘community’ (4.12)

In response to the specific questions about revision of English Heritage guidance on coastal management (at 5.49) we have the following comments:

- **As the threat to heritage assets is likely to outstrip resources for securing adaptation options or recording, investment in adaptation or recording will need to be carefully prioritized. How can we decide which heritage assets should be prioritized for investment?**

It is not a foregone conclusion that the threat to heritage assets will outstrip resources for adaptation or recording action (where loss is unavoidable) for what is significant. The need for careful prioritization based on the RCZA baseline surveys, as noted above, has been anticipated in the English Heritage programme. This will undoubtedly require further enhancement in many areas to form the basis for regional strategies. National guidance on frameworks for priorities according to relative significance may assist but local Historic Environment Record services (HERs) will also be important for informing the process. The Forum commends the comments on the role of HERs in informing communities in the response from the Association of Local Government Archaeologists UK. An integrated programme of coastal monitoring, with planned and rapid-response mitigation by recording is likely to be an important element, drawing on a combination of professional and community-based voluntary groups. Scotland’s well known SCAPE Trust’s model for this approach (<http://www.shorewatch.co.uk>) is one that several organizations are considering for adaptation to the English and Welsh context. Resources to support this will be essential, through local and national funding streams including the Heritage Lottery Fund, and also the creation of regional or sub-regional arrangements for coordinating work and resources.

- **How can communities be involved?**

Active involvement of communities is being explored in projects such as Coastnet’s ‘Tides of Change’, the New Forest coastal survey and a number of coastal heritage initiatives around the country as well as the Shorewatch projects (in Scotland as noted above). The local authority pathfinders will provide opportunities for trying a range of approaches for different communities and we recommend that local HER services and community archaeology groups should be actively drawn into these.

- **How do we realise the public value of a heritage asset before it is damaged by coastal change?**
In principle, there should be no difference in approach in this respect whether the risk is from coastal change or damage from any another agency. Both expert and local views of significance will be relevant in deciding on proportionate measures for protection (either for the asset itself or the knowledge of past communities that can be derived from it through recording and interpretation).
- **Do you have any new examples or ideas to be contained in the updated English Heritage guidance?**
Bringing together local case studies and models for engagement with adaptation issues through community heritage projects on the coast would be helpful.

The Archaeology Forum is pleased to have the opportunity to contribute to this consultation.

Yours faithfully,

Dr Gill Chitty,
Council for British Archaeology
Secretary, The Archaeology Forum

The Archaeology Forum's members are:

The Association of Local Government Archaeological Officers UK
The Council for British Archaeology
The Institute of Conservation
The Institute for Archaeologists
The National Trust
The National Trust for Scotland

Rescue: the British Archaeological Trust
The Society of Antiquaries of London
The Society of Antiquaries of Scotland
The Federation of Archaeological Managers and Employers
The Society of Museum Archaeologists UK