



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

Flood and Water Management Bill  
Team  
Department for Environment, Food and  
Rural Affairs  
Area 2C,  
Ergon House  
London  
SW1P 2AL

James Caird  
Consultant Consultations Co-ordinator  
IHBC Business Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA

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Tel (01584) 876141  
Web site [www.ihbc.org.uk](http://www.ihbc.org.uk)  
E-mail [consultations@ihbc.org.uk](mailto:consultations@ihbc.org.uk)

Dear Sirs

## **FLOOD AND WATER MANAGEMENT BILL**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

In general, the Institute is content with the content of the draft Bill, but we have serious concerns over one aspect which is alluded to in Questions 11, 12 and 13 of the Consultation.

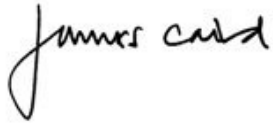
Whilst the arguments in favour of the proposed measures are extremely compelling, there is an underlying trend in flood management that presumes it to be of supreme importance. Where it comes into conflict with other public policy objectives, it is increasing frequently used to overrule those objectives.

For example many historic landscapes have water regimes which do not comply with modern standards but which are integral to their character. These should be subject to "improvement" only after proper consideration of their heritage significance. A similar argument applies to the setting of historic coastal features, such as harbours and piers, whose significance could be reduced by insensitive coastal engineering.

The Institute would like to see the general duties for strategies, at Clauses 15 and 19 of the Bill, to contain requirements to consult with relevant bodies and to take into account any advice received. Our interest is that relevant heritage bodies be consulted in this way, but accept that there will be other disciplines that should also be included (e.g. biodiversity).

We would also like to see this duty also applied to functions in Part 2 of the Bill, Risk Management, Part 3, Reservoirs and Part 5 Sustainable drainage.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator