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Dear Sirs	

COASTAL CHANGE POLICY

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.

The Institute was pleased to see the careful analysis of the coastal change implications for the historic environment in the consultation. We particularly support the careful approach to survey and prioritisation through Shoreline Management Plans that has already started. We propose to comment on the draft supplement to PPS25 in terms that we hope will sharpen planning policy to mirror the approach taken here.

Our answers to the specific questions on the historic environment are as follows:

Question. 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 prioritised. How can we decide which heritage assets should be prioritised for investment?

Answer. The Institute does not believe that a prioritisation strategy will be very effective. In the timescales in which coastal change will occur there will be corresponding changes to the condition and perceived significance of heritage assets which would have affected their management regardless of coastal change issues. Coastal change is just another matter to be considered. We think it likely that specific assets will be brought to attention under differing circumstances and levels of specialist and public interest to the extent that a natural hierarchy of importance will emerge. This is so probable, in our view, that it would almost inevitably overwhelm a structured strategy in any event.

Question. How can communities be involved in the decision making process?

Answer. Communities in England (whether local or national interest) all all too willing to assert themselves when something of value comes under threat. We do not see lack of interest in these circumstances being a problem.

Question. How do we ensure that we realise the public value of a heritage asset before it is damaged by coastal change?

Answer. The Institute supports the hierarchy suggested in the consultation. Each asset should be considered for possible interventions in the following order depending on its significance, the timescales involved, and the other circumstances of each case.

- Protection from coastal change.
- Adaptation to withstand coastal change.
- Removal to a site with a longer term future.
- Recording and material recovery.
- Recording only.

Question Do you have any new examples or ideas to be contained in the updated English Heritage guidance?

Answer. The Institute has no specific advice to give.

Yours faithfully

James Caird

Consultant Consultations Co-ordinator