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BUILDING · CONSERVATION

Making Heritage Work

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29 May 2012

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Dear Ms Westlake

SUSTAINING A LIVING WALES

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. There is a great deal in the Green Paper to be commended, particularly the move towards integrated approaches. The principal topics covered are largely beyond our level of expertise, but we hope that interest might be taken in further development of the approach to improve its delivery on the ground and in Wales's many and varied communities.

We think it is widely agreed that sustainability requires tomorrow's objectives to be achieved within the demands of society today. The public is increasingly familiar with sustainability issues and there are many examples of community action to support greater sustainability almost everywhere.

However the Green Paper deals with a limited range of sustainability issues principally from the top down. While the move from sectional interests to an ecosystems approach is welcome, this will still be largely a systems approach. Similarly many environmental processes will still require regulation from centralized bodies.

Our interests lie in the historic and built environment, including, in the wider context, place shaping. Place shaping includes not just the built environment but also many of those environmental aspects covered in the Green Paper. We think that communities have a greater feeling for places than for concepts and that this could be the key to the widest possible public and community engagement with the ideas set out in the paper.

So with this in mind, our answers to the questions in the Green Paper are:

General Questions

- ◆ Developing a new approach to environmental protection based on ecosystems?

Yes, but we think this should be integrated with cultural, community and economic systems as well.

- ◆ Developing the concept of local resource management planning for natural resources to provide a simpler approach for stakeholders?

We support locally delivered environmental management.

- ◆ Developing a national resource management plan?

We support this.

- ◆ Streamlining regulatory regimes to achieve better outcomes for the environment and simpler systems for people?

Yes. Mention is made in the paper of the Planning System. This includes the system of heritage controls. We know the Government is looking at this aspect separately and would advocate as much synergy of purpose and process as can be devised.

- ◆ Developing interactive geographical information systems to make information more accessible and engage people more widely?

We believe readily available information is key to community engagement.

- ◆ Developing our approach to monitoring and data gathering to increase the emphasis on practical evidence gathering?

We support this as a prerequisite of accessible information.

Detailed questions

- ◆ If you agree or disagree with the proposals above, what are your main reasons?

We have outlined our thinking on establishing the widest possible place and community-based approach in our initial comments.

- ◆ What do you think should be the main priorities for our work in simplifying and integrating designations, policies and regulatory regimes?

The Institute believes that best progress will be made by facilitating local communities to involve themselves in the processes on a place-by-place basis.

- ◆ What would you define as the main success criteria for natural resource management?

We don't think we have a view on this.

- ◆ What would be the success factors for the new Welsh Single Body in delivering the new approach?

The development and support of widespread community understanding and involvement in the processes. The public is interested. They will participate in improving their own environment if empowered and facilitated to do so.

- ◆ Have we reflected the opportunities for business, enterprise and economic development with the natural environment? If not, what have we missed?

We don't think we have a view on this.

- ◆ Have we reflected the opportunities for social and well-being benefits for the people of Wales with the natural environment? If not, what aspects have we missed?

The thrust of our submission is that you have not. People are more interested in their local environment, it's peculiarities and special interests that they are in wider environmental concerns that are beyond their scope to influence as individuals. The old maxim of "think globally and act locally" is a good one. But, as we have said, empowerment and facilitation are key.

- ◆ Where should the boundaries lie between land use planning and environmental management planning and consenting?

The boundaries are currently defined by statute. There might be a case for integrating them into a single system. But this would be at significant variance from UK practice for over 60 years, and would require very careful planning and implementation. A bolting together of existing systems through changes to definitions contained in existing legislation is not advisable. We would happily engage in a wider debate about this.

- ◆ What skills and tools would we need to make the new approach successful? Can you help us develop these?

The Institute has a significant membership in Wales with skills in the historic environment.

- ◆ How could we ensure that offshore (marine) and onshore resource management plans work together?

We don't think we have a view on this.

- ◆ How could national or local resource management plans help preparation of local development plans?

We think that resource management plans should form an essential component of the information base on which development plans are founded.

- ◆ Should local ecosystems outcomes be included in local single integrated plans?

Yes.

- ◆ What steps could we take to create a market in those environmental services that are currently undervalued?

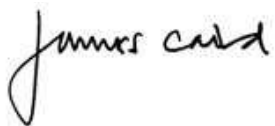
We are not sure that we understand the meaning of this question. Clearly, many environmental systems will require qualified delivery by contractors and consultants. But these should emanate from the needs of the ecosystems and the communities in which they exist and not be engineered for wider economic benefit.

- ◆ What other changes to legislation or systems are needed?

We have nothing further to add. However, if the outcome of the process is merely the establishment of a single environmental NGO for Wales, we think it will have considerably underachieved its potential.

We hope these comments are helpful.

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