



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Marine Policy Statement Team
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Dear Sirs

MARINE POLICY STATEMENT CONSULTATION

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.

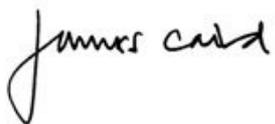
The Institute has prepared responses to some of the consultation questions which are attached as an appendix to this letter. But we would also like to make the following general comments.

- The Institute supports this policy direction as the marine environment has been neglected in policy terms for too long.
- We regret that the historic environment is seen only as something which may be harmed by marine activity. We think its potential contribution to the revitalization of coastal economies and communities should be recognized in the Policy.
- We recognize that the breadth of issues dealt with preclude detailed cross-referencing of the Policy to terrestrial plans and policies. However, in the interests of transparency of approach, we should like to see a comprehensive list of complementary policy either in Guidance or some other form of supplementary document. This will ensure that all involved in the processes set out to understand the inter-relationships involved.

continued/

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

Appendix

Responses to the consultation questions.

Does chapter 1 clearly explain the purpose and scope of the MPS and how it interacts with existing and emerging planning systems?

Yes.

Does chapter 2 clearly state the vision and how it will be achieved? Are the high-level principles and environmental, social and economic considerations to be taken into account in marine planning clearly expressed?

Yes, but we do not think that the High Level Marine Objectives in Box 1 are well-enough balanced. We feel that, important though they are, ecological and biodiversity objectives receive a disproportionate emphasis. We would like to see the bullet point on spatial planning expanded to give specific recognition to the historic built environment and other aspects of cultural heritage.

Section 2.9 on the historic environment is reasonably well expressed, but we note the absence of detailed cross-referencing to other regimes in this and in other topics. We wonder whether further guidance is to be offered and whether, within it, or as a supplement to the Policy, a full list of relevant Policy documents for other regimes could be produced. We envisage this being helpful not so much for marine planning practitioners as a resource for those with whom they have to deal and in the interests of transparency of process.

The Institute also believes that the historic environment has much to contribute to the future of our marine environment, particularly where there are underused historic assets which could be reused in revitalizing and local economies, industries and communities.

Does chapter 3 provide a clear statement of policy objectives for the marine environment? Are the key impacts, pressures and issues for consideration in marine planning appropriately identified?

We think that specific mention could be made of the potential for historic assets to contribute positively, as suggested in the previous paragraph, to revitalizing and local economies, industries and communities in respect of several of the interests dealt with here, especially: 3.4. Ports and Shipping, 3.8. Fisheries and 3.11. Tourism.

Do you agree with the findings of the AoS?

Whilst we think this is well-reasoned, we note that the sustainability appraisal regards heritage assets merely as interests that may be harmed. We think that the potential contribution of heritage assets to the vitality of local economies and communities should also be recognized as a positive feature.

Do you think there are any areas in the AoS which have not been reflected properly in the MPS?

See above.

Do you have any comments on any aspect of the AoS not covered by the previous questions?

See above

Do you have any comments on the HRA?

We have no comment on this aspect.

Do you have any comments on the EqIA screening?

We have no comment on this aspect.

Do you have any comments on the IA and does it fairly represent the draft MPS?

We have no comment on this aspect.