



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

CONSULTATION ON THE MARINE PLANNING SYSTEM

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.

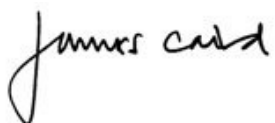
Thank you for inviting us to participate in this consultation.

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 and process development as the marine environment has been neglected in policy terms for too long.
- We have noted in our response to the the MPS that 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. We think this aspect could also be better reflected in the processes proposed for the Marine Planning System.
- We are not sure that the proposals recognize the scale of the task that is being set. The analogous Town and Country Planning system has been running for over 60 years and has gradually developed a considerable amount of professional and technical resource. Even so, these are now threatened under current pressure on resources. Whilst acknowledging the existence of a substantial evidence base on which marine policy and processes may be built, replication of a system which has developed over a long period with one that must function from a standing start will not be easy.

The Institute hopes 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, looping initial 'J'.

James Caird
Consultant Consultations Co-ordinator

Appendix

Responses to the consultation questions.

1. Do you agree that we have identified and captured within Chapter 1 all of the benefits of marine planning?

The benefits set out at paragraph 1.14 mention some examples of aspects of potential benefit from a positive approach. We think these might include heritage assets, of which a great many exist in coastal areas.

Paragraph 1.15 refers to the outcome benefit of reduced risk to heritage assets. We think it should also refer to the benefit heritage assets can provide to regeneration schemes.

We support the stated benefits of improved co-ordination of plans and controls with terrestrial regimes.

2. Have we set out and appropriately considered in Chapter 2 and elsewhere the elements required before marine planning can begin?

The Institute found Chapter 2 a little disjointed.

We realize that the various forms of heritage appraisal may fall within the definition of statutory and non-statutory plans in the description of the evidence base, but we think it would be useful for this list to be extended, if not here in an appendix or supplementary document.

3. Does the proposed structure and content for Marine Plans provide appropriate clarity to enable the MMO to create effective Marine Plans in England (Chapter 3)? In particular, is the overall approach to planning recommended and outlined in paragraphs 3.7 to 3.9 appropriate?

In supporting the general approach we would comment that:

- For the sake a transparency and familiarity of process, the system should follow the principles of the Town and Country Planning system as far as possible and note that, in general, it does this.
- We support the proposal that, in the absence of policy in the MPS, plan-specific policy is allowable.
- We particularly support the provision that Plans should not inhibit the future designation of environmental assets not so designated at the time a plan is prepared.
- We should like to see further amplification of the term "stakeholder". The definition of "any interested person" (paragraph 4.12) is so broad that it might make consultation processes difficult. We should like to see broad categories of stakeholder interest referred to, in order to focus policy development without undermining the breadth of scope intended. This is done to an extent in Chapter 5 but deserves a reference here.
- Whilst we support the review cycle of 3 years (paragraph 3.63) potential triggers for the plan review process would be helpful.

4. In Chapter 4 have we covered all steps required to draft Marine Plans?

We are reasonably satisfied with the proposals.

5. Are the roles and responsibilities of key stakeholders clear in Chapter 5?

We support the proposal for Marine Planning Advisory Groups. We think examples could be given and that heritage advisory groups could make a significant contribution in some areas.

We support the proposal at paragraph 5.26 that the integration of marine and terrestrial plans could go beyond avoiding conflict and seek to achieve delivery of each other's goals.

6. In Chapter 6, is it clear how the marine planning system interacts with plans and processes on land?

We perceive quite a lot of overlap between Chapter 5 and Chapter 6. This is because many of the stakeholders referred to in Chapter 5 are closely identified with the plans and strategies that they produce. We wonder whether there isn't a way of combining these two chapters in a way that makes the subject matter more concise.

We feel that specific references to the terrestrial heritage protection system are absent. We think they should be inserted as part of the section on the Town and Country Planning system.

We support the notions of "marine- and terrestrial-proofing"

We would like to see an example involving the use of a heritage asset in a regeneration proposal included in those at paragraph 6.35 et seq.

7. In Chapter 7, is the approach to decision making both during and after the adoption of Marine Plans clear?

Reasonably so, although it is not entirely clear how proposals that have both marine and terrestrial components will be co-ordinated.