



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

SEA Scoping Consultation
Nuclear Unit
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Department for Business, Enterprise
and Regulatory Reform
London
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Dear Sirs

**CONSULTATION ON STRATEGIC ENVIRONMENTAL ASSESSMENT SCOPING
REPORT FOR THE PROPOSED NATIONAL POLICY STATEMENT FOR NEW
NUCLEAR POWER**

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.

The Institute welcomes the opportunity to comment on the consultation and generally supports the approach taken. The Institute does have one major concern, however, regarding the Scoping Report's treatment of heritage assets in relation to Questions 1, 3 and 5.


The Report takes a strategic view in line with the role of the NPS. However, in relation to heritage features, it treats listed buildings and conservation areas as second stage topics to be dealt with after strategic assessment has taken place. We see three problems with this approach:

- The draft Heritage Bill, currently before Parliament, envisages heritage assets being classified in a single unified list and not graded into stages as set out in tables 5.1 and 5.2 of the consultation. It is not clear how SEA will be applied once the Bill is enacted.
- Heritage assets proposed to be assessed at stage 2 can be found in great concentration in some places (for example in cathedral and university cities) and such concentrations should be treated strategically. There also may be more isolated listed buildings of particular note (usually grade 1) which also need protection. It is not yet clear whether the procedures to be used to establish "Exclusionary Criteria" and "Discretionary Criteria" will adequately address this issue.

- Grade 1 listed buildings are assessed as being of national importance. This means that they at least should be included in Stage 1 assessments.

Whilst noting that the Planning Bill is not destined to be included amongst "the planning acts" as defined, nor will "development consent" constitute "planning permission", we feel that the principles contained in ss66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, should apply to decisions under procedures provided for by the Bill.

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