



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

HS2 Environmental Statement
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Dear Sirs

HS2 PHASE ONE ENVIRONMENTAL STATEMENT

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 IHBC does not comment on case-work and consequently has no comment to make on any of the detailed analysis in the Environmental Statement. However, a good many of our members work for local authorities and other interested parties along the route of the proposal and we have been informed of systemic shortcomings of the Environmental Statement which leave its conclusions on impacts on the historic environment in general seriously flawed or absent altogether.

The Environmental Statement contains circular references in relation to the historic environment which provide no method for the assessment of impacts. For example, the Heritage and Planning Memorandums say that the Environmental Memorandum will deal with the setting of heritage assets, but the Environmental Memorandum is silent on the issue. The Code of Construction Practice (CoCP) states that the Heritage Memorandum will lay out a process for recording of affected assets, but the Heritage Memorandum cites the CoCP and the Written Scheme of Investigation, yet to be produced and which, in any event, will not deal with matters of detail. We have been informed that even then the generic ones won't include adequate detail, nor will they be produced until site specific ones are dealt with. This will be too late to deal with many issues of principle of considerable importance to the historic environment.

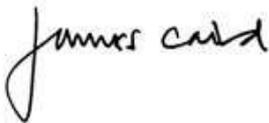
We have not examined the Environmental Statement beyond the sphere of our own interest, but expect that similar shortcomings may exist in relation to other forms of environmental impact. Our conclusion is that either the Environmental Statement is

unfit for purpose as a whole, or that the historic environment has been singularly ill-served by the process.

We therefore ask that the historic environment elements be reassessed by suitably qualified and experienced persons, at a level equivalent to full membership of the IHBC. We think it is wholly incumbent on the developers of this proposal to ensure that all the environmental impacts, including those affecting the cultural environment, are properly weighed against the other costs and benefits of the proposal.

We are not sure of the precise terms of the obligations of the Secretary of State regarding the historic environment under the prescribed procedures. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, impose on the Secretary of State a statutory duty to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural interest that they possess. We expect that the prescribed procedures have the same or similar requirements. A significant number of listed buildings are affected by the proposals. It is therefore essential that the Environmental Statement clearly and unequivocally addresses how this special regard is to be addressed. The present Statement does not do so and is therefore flawed.

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