



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

RDP SEA Consultation
Welsh European Funding Office
Welsh Government
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Dear Sirs

**STRATEGIC ENVIRONMENTAL ASSESSMENT: ENVIRONMENTAL REPORT,
2014-2020 RURAL DEVELOPMENT PLAN**

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. Generally the Institute thinks that the Report is thorough and balanced, but we do have some minor comments relating to our interest in the Historic Environment.

The Institute welcomes the strong emphasis in the Report on sustainability and sustainable development. We think the Historic Environment has a strong role to play in the delivery of this; not just in cultural preservation, but also in the contribution that historic buildings and historic places can contribute to social, economic and environmental sustainability.

We think the assessment of the Historic Environment in paragraphs 4.7.5-4.7.12 is reasonably fair. However some aspects of HE are not mentioned which we think should be. These are conservation areas, battlefield sites (although these may have been included in the Cadw list mentioned in paragraph 4.7.10) and historic parks and gardens.

We strongly support the points about the importance to the Welsh landscape of the retention and maintenance of traditional rural buildings, as well as the need for training in traditional building crafts set out in paragraph 4.7.9.

Section 3.4 on page 40 deals with SEA indicators. None is suggested for cultural heritage despite the Cadw "listed buildings at risk" index being referred to in the text. The Institute thinks this is as good a "quantifiable" as others of the suggested indicators

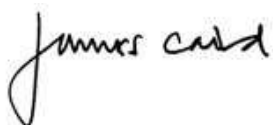
and suggest its inclusion in the list. We think this suggestion is supported by the fact that listed buildings feature prominently in the Summary of Issues at paragraph 4.21.1 on page 95 and heritage is one of the columns in the Assessment Matrix in Table 7.

The assessment matrix (Table 7 on page 100) includes "Protect places, landscapes & buildings of cultural, heritage and archaeological value" as one of the 12 columns in its objective/impact axis. We strongly support this.

We have no comments on Section 6 and the question of "reasonable alternatives" to the RDP, as, to do so would involve a reassessment of the RDP itself.

The summary in Section 7 acknowledges the potential of the RDP to protect and enhance heritage (7.1.5) but comments reasonably that this will depend considerably on the availability of funding in parallel programmes. We accept this reality.

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