



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Planning Policy Branch
Planning Division
Welsh Government
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Dear Sirs

A STRATEGIC MONITORING FRAMEWORK FOR THE 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.

We are pleased to participate in this consultation. However, we note that we are not listed amongst the bodies being consulted at Annex E. We should be pleased if you would add our details (above) to the list of those consulted on planning and heritage related consultations.

We are pleased that the Welsh Government is progressing the difficult task of developing a system for measuring planning outcomes across Wales as a whole. We also applaud the systematic approach being taken. While we have completed the consultation form (attached herewith) we would like to highlight an aspect that we feel needs further development. This is the limited nature of proposals in monitoring environmental impacts of the ground – a limitation acknowledged by the Consultation Paper at paragraphs 40 and 41. We do this with reference to Indicator 15: Listed Building and Conservation Areas Consents.

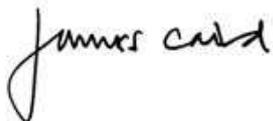
The problem with this indicator is that it is an Output Measure that does not measure Outcomes let alone Impacts. While it adequately covers the level of activity and can be calibrated against the baseline information about listed buildings and conservation areas, it ignores the fact that consents can be environmentally damaging through inadequate appraisal, conditions or follow-up; whereas refusals can be environmentally damaging through inadequate appreciation of the potential effects of continuing under-use or neglect.

The Institute thinks that the proposed indicators need to be supplemented with some form of outcome and impact review. This might be in the form of Authorities reviewing

decisions after (say) 5 years, perhaps as sample self-assessment, with peer review to ensure some degree of objectivity. It might be appropriate for this to be introduced as a specific monitoring requirement for Development Plan Reviews.

We are sure that the same thoughts will apply to other indicators and we fear that, without such processes, the proposals will not achieve their stated aims.

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