



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Environment Agency
(transcript in letter form of comments
made on the on-line response from)

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

22 March 2012

Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Sirs

UNDERGROUND STORAGE TANKS

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. Our responses to the questions we wish to respond to are as follows:

Q1) Section 3 outlines your main legal obligations associated with permitting and licensing for environmental protection. Have we covered all the relevant legal aspects of underground storage in this section?

We think some reference should be made to the historic environment, particularly impacts on listed buildings and archaeology. Whilst these regimes are not the responsibility of the Environment Agency they frequently overlap, and even conflict with, issues which are EA responsibilities. We think cross-referencing might be made (say by footnote) of the need to ensure compliance with all statutory regimes.

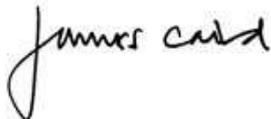
Q2) Section 4 describes how you can reduce the risk of pollution by making the right planning and pre-installation choices from the start. Have we provided enough information in this section?

We think some reference should be made in section 4 to the historic environment, particularly impacts on listed buildings and archaeology. Whilst these regimes are not the responsibility of the Environment Agency they frequently overlap, and even conflict with, issues which are EA responsibilities. We think cross-referencing might be made (say by footnote) of the need to ensure compliance with all statutory regimes, or by adding specific points to the second bulleted list in the first paragraph of section 4.

Q7) Please tell us if you have any other views or comments to make on our guidance that have been not covered by previous questions.

Overall we find the draft document helpful. However, we think it should avoid giving the impression that EA interests are the only ones that may have to be complied with and appropriate cross-referencing might be the way to achieve this.

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