

Response ID ANON-N89E-BSKX-V

Submitted to Environmental Outcomes Reports: A new approach to environmental assessment
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Respondent details

What is your name?

Name:
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What is your email address?

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What is your organisation?

Organisation:
Institute of historic Building Conservation

What type of organisation are you representing?

Professional body

If you answered "other" please provide further details:

About this consultation

Would you like anything in your response to be kept confidential?

Yes

If yes, please state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. If no, please state none in the box. :

Please just use the name of the Institute as the response is being made on behalf of IHBC

An outcomes-based approach

1 Do you support the principles that will guide the development of outcomes?

Yes

2 Do you support the principles that indicators will have to meet?

Yes

3 Are there any other criteria we should consider?

Please specify:

Not sure

4 Would you welcome proportionate reporting against all outcomes as the default position?

Yes

5 Would proportionate reporting be effective in reducing bureaucratic process, or could this simply result in more documentation?

Please specify:

It remains to be seen in operation

6 Given the issues set out above, and our desire to consider issues where they are most effectively addressed, how can government ensure that EORs support our efforts to adapt to the effects of climate change across all regimes?

Please specify:

Through use of well considered and clear legislative mechanisms and accompanying guidance for implementation for Planning authorities

What an Environmental Outcomes Report will cover

7 Do you consider there is value in clarifying requirements regarding the consideration of reasonable alternatives?

Please set out the reasons for your answer:

Yes there may be a need to provide for special provisions of reasonable alternatives under the headings of 'Landscape and Seascape' and also concerning 'Cultural Heritage and Archaeology.'

8 How can the Government ensure that the consideration of alternatives is built into the early design stages of the development and design process?

Please set out the reasons for your answer:

Requirement for plan-makers and developers to provide a summary record of their decision-making on alternatives at an early stage will ensure that time is not wasted on options that do not have appropriate or reasonable value.

When an Environmental Outcomes Report is required

9 Do you support the principle of strengthening the screening process to minimise ambiguity?

Please set out the reasons for your answer:

Yes and to provide clarity about what is being required

10 Do you consider that proximity or impact pathway to a sensitive area or a protected species could be a better starting point for determining whether a plan or project might require an environmental assessment under Category 2 than simple size thresholds?

Yes

11 If yes, how could this work in practice? What sort of initial information would be required?

Please set out the reasons for your answer:

Perhaps a decision making pathway summary

Strengthening mitigation

12 How can we address issues of ineffective mitigation?

Please set out the reasons for your answer:

By requiring heritage impact assessments for developments which might have an impact on landscapes or seascapes and for cultural heritage.

13 Is an adaptive approach a good way of dealing with uncertainty?

Yes

14 Could it work in practice? What would be the challenges in implementation?

Please set out the reasons for your answer:

Lack of clear rationalisation to support good decision making framework would inhibit implementation

Mainstreaming monitoring

15 Would you support a more formal and robust approach to monitoring?

Yes

16 How can the Government use monitoring to incentivise better assessment practice?

Please set out the reasons for your answer:

Provision of guidance for practitioners on best practice and building in checks and balances to reporting stages and establishment of periodic monitoring arrangements for landscapes and seascapes as well as cultural and natural heritage that could become vulnerable through cumulative negative impact factors

17 How can the Government best ensure the ongoing costs of monitoring are met?

Please set out the reasons for your answer:

By specifying from the outset the requirement to fulfil best practice requirements and ensuring regular checks and balancing requirements are met through the process

18 How should the Government address issues such as post-decision costs and liabilities?

Please set out the reasons for your answer:

Not sure

Unlocking data

19 Do you support the principle of environmental data being made publicly available for future use?

Please set out the reasons for your answer:

No

20 What are the current barriers to sharing data more easily?

Please set out the reasons for your answer:

Not sure

21 What data would you prioritise for the creation of standards to support environmental assessment?

Please set out the reasons for your answer:

Good case studies demonstrating best practice

Reporting against performance

22 Would you support reporting on the performance of a plan or project against the achievement of outcomes?

Yes

23 What are the opportunities and challenges in reporting on the achievement of outcomes?

Please set out the reasons for your answer:

Establishment of best practice models could be an opportunity.

Transition

24 Once regulations are laid, what length of transition do you consider is appropriate for your regime?

iii) 2 years

Please state regime:

Preventative Conservation and implementation of best practice for maintenance and repair.

Supporting the capacity and capability across regimes

25 What new skills or additional support would be required to support the implementation of Environmental Outcomes Reports?

Please provide an answer:

Capacity training could be put in place by relevant governing bodies/institutes

Public Sector Equality Duty

26 The Government would be grateful for your comments on any impacts of the proposals in this document and how they might impact on eliminating discrimination, advancing equality and fostering good relations.

Please provide your comments:

No comment to make