

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and
Communications Committee
Amgylchedd Hanesyddol / Historic Environment
CWLC(5) HE06
Ymateb gan / Evidence from Royal Town Planning Institute (RTPI)

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

RTPI Cymru welcomes this opportunity to respond to the Culture, Welsh Language and Communications Committee on their inquiry into the historic environment. We responded at length to the consultations on the regulations required by the [Historic Environment Act and associated guidance \(January 2016\)](#), and on the update to [Planning Policy Wales, Chapter 6 \(June 2016\) \(Historic Environment\)](#).

Our comments in relation to the terms of reference for this Inquiry are set out below.

Implementing the Historic Environment Act

A key element of implementation of the Act will be the momentum behind the preparation of secondary legislation and related guidance. We appreciate and support Welsh Government's commitment to implementing the Act quickly and effectively. Nonetheless, there is further secondary legislation and guidance required. It is important that the Welsh Government maintains the momentum required with this to ensure that the Act can be fully and effectively implemented.

The most critical success factor for the Act will be the resources available to implement it. Declining resources in local authorities has led to a decline in local authority expertise. Greater resources are needed for this sector in both Local Authority Planning (LPA) departments and within Cadw. The measures and guidance which are now available as a result of the Historic Environment (Wales) Act 2016 represent profound progress in safeguarding much of the distinctiveness of Wales. However, the best of tools require adequate resources to deliver the best

outcomes. There are particular concerns with regard to the capacity and skill set available to LPAs in delivering their responsibilities following the reductions in funding available to local authorities. Specialist resources to handle historic environment workload are known to be under particular strain. Now, following the enactment of the Historic Environment (Wales) Act 2016, there is a strong case for the Welsh Government to be pro-active in encouraging and supporting LPAs in ensuring that these important services are adequately resourced.

Implementation of the Act will require all stakeholders to look at the way in which the historic character of Wales and its settlements are managed. Planning Policy Wales (PPW) (para 6.4.9) makes it clear that “development proposals will be judged for their effect on listed buildings and their settings, and on the character and appearance of conservation areas.” However, with diminishing resources in LPAs and in particular the loss of specialist skills, there is growing concern that these considerations are not being given sufficient weight through the development management process. There is a growing need for Welsh Government / Cadw to monitor these trends, with a view to providing support where needed and where necessary using their powers of intervention. We also believe that there is a case for research on this issue, to measure the situation.

The culture change within the planning system, including the pre application stage of the process, needs engagement and input from Cadw. Cadw have an important role in helping to contribute to the evolution of designs within listed building consents, rather than the regulatory end point/final decision stage for non-delegated decisions. Bringing alternative use back into unused and under used listed buildings needs wider and earlier engagement from LPA Conservation and Cadw officers to bring forward appropriate schemes.

Protection for listed buildings and scheduled monuments

Concern has been expressed that often few of the individual buildings in the distinctive communities around Wales which grew up during the industrial revolution meet the standards normally applied to secure listing. As a result, areas of profound historic character often lack the tools to ensure their future, in particular resources for conservation are often scarcely available in Wales's more deprived communities. We believe that there is a need to look at mechanisms for redressing this imbalance.

We believe that Conservation Area Appraisal is a key mechanism for helping to achieve the objectives of the Act. Having up-to-date conservation area appraisals

is a critical success factor in contributing towards the objectives set out in section 6.2 of PPW. While their value is recognised in PPW, we believe this should be strengthened. A programme for each LPA for preparing and updating Conservation Area Appraisals would help to ensure good quality development plans, contributing to the objectives set out in Section 6.2 of PPW. We also support the input of Cadw, and other stakeholders such as landowners etc. into Conservation Area Appraisals. However, this will require additional resources, as already highlighted.

It is also important that the setting of heritage assets is recognised and fully considered. Cadw should have the key role in helping to move forward proactive advice on setting.

Protection for buildings and monuments at risk

We recognise that the planning system has a major role to play in relation to protection and reuse of listed buildings and scheduled ancient monuments, alongside other consent mechanisms, such as scheduled monument consent.

There is a need to review and maintain up to date planning guidance, reflecting the new legislation, to ensure local authorities and others know what approach to take in regard to future proposals for protection, conservation or development . This should address how development plans and other material such as design briefs or development briefs should take account of the legislation. There should also be clear guidance on development management and enforcement matters such as planning conditions related to the historic environment, and the powers of local authorities to intervene where buildings or other structures of heritage value are at risk due to neglect or inappropriate developments.

Within planning policy and guidance there should be a recognition of the benefits of development which protects and is sympathetic to the historic environment but which can also enable viable economic proposals which can help make sites financially secure for the longer term.

There should also be clarity of the ways in which local authority planners, the Planning Inspectorate and others can access specialist information and guidance knowledge from Cadw. This should cover consultation on development plans and handling advice on development proposals.

The availability of people with specialist building and other skills to restore listed buildings and scheduled ancient monuments is crucial to future initiatives. Cadw should be encouraged to carry out an audit of such skills available in its own ranks, those of other public bodies, the National Trust which organises its own skills base, and more widely. Such an audit could identify current or emerging skills shortages and advise on how they can be addressed, possibly expanding existing training courses or opening new ones.

Cadw could bring forward greater monitoring of buildings at risk, with more emphasis on an action plan and implementation schedule for identified buildings.

Facilitating collaboration within the sector

The ability of LPAs to protect and to assist the viable use of listed buildings and scheduled ancient monuments depends on the availability of staff with specialist knowledge. It would be unrealistic to expect all LPAs to have the necessary skills within their own staff. LPAs should be encouraged to develop combined specialist resources to cover this matter, as well as developing relationships with private sector consultancies where such skills may exist. Cadw could provide some regular training courses to raise the skill of planning practitioners in relation to heritage buildings and structures and to relevant legislation.

Maximising the value of heritage tourism and Cadw's work to meet its income generation targets

There are already numerous examples where a positive response from the planning system has enabled listed buildings and scheduled ancient monuments to become more successful as tourist destinations, thus generating more income for the owners (including Cadw) and supporting commercial operations in the surrounding area. The relevant planning guidance should be examined and if necessary updated to ensure that such a positive approach is followed where it does not harm the integrity of the historic heritage.

Matters such as access for public and private transport, links to bus routes, cycle ways, long distance footpaths, the availability of public conveniences, and access to nearby services should all be addressed when considering planning applications or providing advice in design briefs etc.

We also believe that PPW should be expanded to include the role of the historic environment as a critical asset for the tourism economy, and its role directly and indirectly in providing employment.

Delivery of Baroness Andrews' Culture and Poverty Report

Planning guidance should emphasise the particular value of surviving heritage, including industrial heritage, in deprived communities. Protecting and encouraging the viable reuse of suitable buildings or features in these areas will produce not only environmental and economic benefits but also more intangible benefits of creating a positive perception of an area's potential.

The report by Baroness Andrews shows how museums, libraries, archives, historic monuments and arts organisations are key resources to inspire people to learn and gain skills. They can help individuals and communities develop confidence and a sense of identity. The report made a compelling case for all involved to make a concerted effort to work together more effectively to maximise the benefits cultural participation can have for those living in our most deprived communities.

Collaboration with heritage assets in the private sector

The planning system must deal equitably with protection of heritage buildings and features, and considering planning proposals for them, whether in public or private ownership. However the planning system can through development plan policies, and other aspects such as local development briefs or tourism strategies, provide a context and a close and mutually beneficial relationship between heritage assets in public and private ownership and their surrounding areas.

Public bodies with responsibilities for listed buildings need to lead by example to give them credibility in persuading others to maintain buildings in sound condition and find sustainable long term uses where original uses have become redundant. However we are aware that funding is important to underpin such efforts and the pressures on public finances are an obvious limitation currently. There is a case for more extensive guidance for public authorities in the management and disposal of listed buildings, and more energetic monitoring of the condition of such buildings by Cadw.

Cadw's future status

Our comments in relation to the future status of Cadw relate to the level of expertise available at Cadw and the availability of that expertise to local authority planners and others needing advice and support. This should be maintained at a high level, with appropriate resources to enable this.