

CONSULTATION FORM

Draft revisions to Planning Policy Wales Chapter 6: The Historic Environment

We want to know your views on the proposed changes to the Welsh Government's planning policy on the historic environment.

Please submit your comments by 13 June 2016

If you have any queries on this consultation, please email: planconsultations-j@wales.gsi.gov.uk or telephone: 029 2082 3524

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

If you do not want your response to be shown in any document we produce please indicate here

CONSULTATION FORM

Draft Revisions to Planning Policy Wales Chapter 6: The Historic Environment (Consultation)

Date 9 June 2016

| | | |
|--|--|-------------------------------------|
| Name | Jill Bullen | |
| Organisation | Natural Resources Wales | |
| Address | Ty Cambria 29 Newport Rd Cardiff CF24 0TP | |
| E-mail address | Jill.bullen@cyfoethnaturiolcymru.gov.uk | |
| Telephone | 0300 065 4706 | |
| Type <i>(please select one from the following)</i> | Businesses | <input type="checkbox"/> |
| | Local Planning Authority | <input type="checkbox"/> |
| | Government Agency/Other Public Sector | <input checked="" type="checkbox"/> |
| | Professional Bodies/Interest Groups | <input type="checkbox"/> |
| | Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations) | <input type="checkbox"/> |
| | Other (other groups not listed above) | <input type="checkbox"/> |

| | | |
|---|--|---|
| Q1 | <p>Do you agree with our objectives for the historic environment? If not, what objectives would you like to see or how would you change the existing objectives?</p> <p>Section 6.2 of draft PPW Chapter 6 refers to our revised objectives for the historic environment.</p> | X |
| Agree | | x |
| Neither Agree nor Disagree | | |
| Disagree | | |
| Further comments | | |
| <p>More explicit reference could be made within chapter 6 of the overlapping interests between the historic and natural environment and how this can facilitate improved working and understanding. 6.5.11 makes reference to duties towards nature conservation but it would be highly desirable to include as an objective in 6.2 – making an important and key connection between the Historic Environment (Wales) Act and the Environment (Wales) Act. Suggested text ‘Improved working and understanding between the historic and natural environment contributing to the sustainable management of natural resources’</p> <p>The Welsh Government task and finish group on ancient, veteran and heritage trees reported (February 2016) that better mechanisms were required to record and protect these historic and natural assets. Ancient woodlands are addressed in chapter 5 but individual heritage trees are not. An additional objective of ‘safeguard and enhance the character of historic urban green-space, heritage, ancient and veteran trees’ is proposed.</p> <p>The objectives for the historic environment include conserving, protecting, and enhancing. In order to ensure a consistent understanding and application of these objectives, we suggest that Chapter 6 is supported by footnotes which clearly explain these terms.</p> <p>The specific reference to climate change and the need to take it into account in planning authority decision making is welcomed. However, greater clarity on what is required is suggested by amending the first sentence of 6.2.3. Currently, the sentence conveys a need for planning authorities to modify historic assets to reduce carbon emissions etc. but perhaps what is intended is to take account of climate change when historic assets are modified. In addition, it should be clearer that there is a need to reduce the risks arising from climate change rather than just the more generic ‘respond’. Hence, this sentence would be better phrased ‘Where local planning authorities pursue the reuse or modification of historic assets, they should also seek to reduce carbon emissions, secure sustainable development and reduce the impacts of climate change through adaptation measures.’</p> | | |

| | | |
|--|--|----------|
| Q2 | Do you agree that the roles and responsibilities of those involved in the planning process relating to the historic environment are clear and well defined? If not, how would you clarify them? | X |
| | Section 6.3 of draft PPW Chapter 6 provides information on the roles and responsibilities of those involved in the planning process relating to the historic environment. | |
| | Agree | |
| | Neither Agree nor Disagree | x |
| | Disagree | |
| Further comments | | |
| Natural Resources Wales (NRW) is specifically referred to in 6.3.2 in relation to including areas on the register of historic landscapes in Wales in partnership with Cadw, NRW is supportive of this ongoing strategic role, responsibility and involvement. | | |
| 6.3.5 makes reference to understanding historic character, NRW has a responsibility for the all Wales spatial dataset on rural historic landscape character through LANDMAP Historic Landscape, as Cadw does for historic characterisation of urban areas. An additional footnote is recommended next to footnote 5 to make reference to LANDMAP as ‘ Natural Resources Wales (2016) LANDMAP Methodology Historic Landscape ’ | | |

| | | |
|-------------------------|--|----------|
| Q3 | Do you agree that the approach to be taken in the preparation of development plans fully considers the historic environment? If not, how would you suggest that this is overcome? | X |
| | Section 6.4 of draft PPW Chapter 6 refers to consideration of the historic environment in the Local Development Plan process. | |
| | Agree | |
| | Neither Agree nor Disagree | x |
| | Disagree | |
| Further comments | | |

6.4.9 As part of a wider approach to help ensure that developers and the wider public are aware of interests that may need to be taken into account as part of a development proposal, we consider that the boundaries of registered historic landscapes should be identified in the Proposals Map of relevant Local Development Plans

| | | |
|---|--|-----------------|
| <p>Q4</p> | <p>Do you agree that the approach to be taken during the Development Management process when determining applications relating to historic environment designations fully considers the historic environment? If not, how could this be improved?</p> <p>Section 6.5 of draft PPW Chapter 6 refers to the approach to be taken during the Development Management process when determining applications relating to historic environment designations.</p> | <p>X</p> |
| <p style="text-align: right;">Agree</p> | | |
| <p style="text-align: center;">Neither Agree nor Disagree</p> | | |
| <p style="text-align: right;">Disagree</p> | | <p>x</p> |
| <p>Further comments</p> | | |
| <p>To improve the connection between the historic and natural environments the following additions are proposed. 6.5.10; add biodiversity interest after special architectural or historic interest and 6.5.21 add ‘Authorities should take into account the visual, historic, amenity and ecosystem service contribution of trees and green-space in conservation areas’ and in line two, ‘new planting or replanting of trees and green-space provision may be appropriate where consistent with the character or appearance of the area’.</p> <p>NRW welcomes that information on the Register of Historic Landscapes in Wales should be taken into account by local planning authorities in 6.5.25, however we have concerns that the unclear wording could be interpreted in a number of ways. Information on the register should be taken into account for developments that meet the criteria for Environmental Impact Assessment (EIA), or, if on call in, in the opinion of the Welsh Ministers, they would have more than local impact. The wording suggests that only developments that meet the criteria for EIA should be considered rather than more than local impact. There may be some developments that meet EIA requirements but do not have more than local impact on an area of a registered historic landscape, similarly there may be developments that do not meet EIA criteria but do have more than local impact on a registered historic landscape, worded as it is it does not address this dichotomy. The current wording is also unclear if more than local impact is only relevant when planning applications are called in by Welsh Ministers. Using local impact rather than proximity aligns more closely with the intentions of the ‘guide to good practice’. More than local</p> | | |

impact should be the starting point to determine if an assessment is required for both EIA and non-EIA developments. We therefore suggest that paragraph 6.5.25 is amended to read:

Information on the register of historic landscapes in Wales should be taken into account by local planning authorities in considering the implications of developments which may have ‘more than local impact’³⁸ on an area of a registered historic landscape, or where the proposed scheme meets the criteria for Environmental Impact Assessment, and there is a likely significant effect on an area of the registered historic landscape. Developments located within or outside the boundary of a registered historic landscape may have a more than local impact on the designation, and therefore local planning authorities should consult Cadw where a development proposal within, or outside, a registered historic landscape, may have ‘more than local impact’ on an area of the registered historic landscape.

6.5.26 In understanding the registered historic landscape there is a need to take historic landscape characterisation (HLC) into account, we recommend that reference to HLC should be made within chapter 6 and suggest this could be made in 6.5.26 with a minor alteration of wording to ‘...on a **registered historic landscape and associated historic landscape character areas** (ASIDOHL2)’.

There is no reference to heritage coasts, historic seascape characterisation, marine historic assets and other interests in the coast and marine environment within development planning and consenting.

| | | |
|-------------------------|--|----------|
| Q5 | Do you agree that it is appropriate to include text on Enabling Development as national planning policy? If not, is this a matter more appropriate to set out within Cadw’s guidance on the historic environment? | X |
| | Paragraphs 6.5.27 and 6.5.28 of draft PPW Chapter 6 provide text on the consideration of enabling development during the determination of planning applications. | |
| | Agree | x |
| | Neither Agree nor Disagree | |
| | Disagree | |
| Further comments | | |
| | | |

| |
|--|
| |
|--|

| | | |
|-----------|---|----------|
| Q6 | We have asked a number of specific questions. If you have any related issues which we have not addressed, please let us know. | X |
|-----------|---|----------|

Further comments

In line with making connections between the historic and natural environments, in 6.1.2 urban green-space could be added to the first sentence ‘... historic parks, gardens, landscapes **and urban green space**...’ as the overall historic green infrastructure component within the built environment, which may include as examples civic squares, streets, pocket parks and churchyards, does not entirely fit within the specific headings of historic assets, Conservation Areas and Historic Parks & Gardens.

The management of listed buildings, Scheduled Monuments and other historic environment features in woodlands is not affected by planning policy and therefore are not affected by the proposed changes to chapter 6. The guidance documents being developed by Cadw will have a bearing on how NRW and other woodland managers identify and protect historic environment features.

NRW activities that are regarded as development such as civil engineering or new buildings would be subject to PPW and therefore chapter 6 will apply to these as it would to any other development. NRW would comply with relevant conditions for the historic environment included in planning permissions from the local planning authority. In relation to the management of the Welsh Government woodland estate NRW is certified against the UKWAS and follows UKFS guidelines for archaeology. In implementing management following these guidelines NRW will contribute to the WG objectives for the historic environment.

How to respond

Please submit your comments by 13 June 2016, in any of the following ways:

| Email | Post |
|---|---|
| <p>Please complete the consultation form and send it to : planconsultations-j@wales.gsi.gov.uk [Please include Planning Policy Wales Chapter 6: The Historic Environment consultation in the subject line]</p> | <p>Please complete the consultation form and send it to: Planning Policy Wales Chapter 6 Consultation Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p> |

| Additional information |
|---|
| <p>If you have any queries about this consultation, please Email: planconsultations-j@wales.gsi.gov.uk Telephone: 029 2082 3524</p> |