



30th October 2009

c/o Kaye Moxon
Cadw
Plas Nantgarw
Unit 5 /7 Cefn Coed
Parc Nantgarw
Cardiff CF15 7QQ

Dear Sir / Madam

Conservation Principles, Policies and Guidance for the sustainable management of the historic environment in Wales: Consultation

RTPI Cymru is pleased to submit a response to Cadw's Consultation on its draft Conservation Principles. RTPI Cymru's Policy and Research Forum has considered the proposals and its responses are set out below, against each of the consultation questions.

RTPI Cymru welcomes the publication of the Conservation Principles. The emphasis it gives to 'place', beyond individual buildings, is important in creating sustainable and high quality places in Wales.

1. Are Cadw's Conservation principles laid out and explained clearly? Please identify any parts of the text that you find hard to understand or that remain unclear.

The principles themselves are clearly set out. However, the document should clearly state its purpose, beyond the use by Cadw for its own estate. There are clearly potential implications for determining planning applications, therefore the status of the Conservation principles, as material considerations for planning should be stated. Local Planning Authorities (LPAs) will require clear guidance on the status and weight that should be afforded to the Principles in the context of the development management system.

3. Do you feel that there are any issues that have not been addressed in Conservation principles?

Managing the historic environment in a changing climate needs to be recognised within the Principles, possibly Principle 1. There needs to be a clear statement that the historic environment will need to adapt to a changing climate in its maintenance and management, otherwise this is a high risk that it will deteriorate. This will require a new approach to management of historic buildings and places.

- 3. In principle 2, we propose a different approach to assessing significance from that described by English Heritage. We suggest that this should be based on an assessment of the ‘fabric, form and function’, of a significant place and the values that people ascribe to it. Do you agree with this approach?**

Both approaches have merit. However RTPI Cymru would agree with the proposed method for Wales. However, we would advise that there is guidance to support this, particularly for guiding community groups, who may misinterpret the concept.

It is not clear what is being said about the link and balance between development and conservation, particularly in terms of ‘historic landscape’ and others beyond statutory protection. Whilst we appreciate that a link is being made between the use of the European Landscape Convention definition of landscape “as perceived by people”, there is a danger that depending on people’s perception of significance in that all space (in terms of form, fabric and function) has some relationship to the past; it is our opinion that there needs to be some sort of objective assessment as well. The current exercise of describing the characteristics of the historic landscape of Llŷn (being done by Gwynedd Architectural Trust in Gwynedd) is a case in point.

<http://www.heneb.co.uk/llynhlc/llyncharmappic.html>

The Llŷn Peninsula is divided into 22 subareas with each one having some historic characteristics of interest but no assessment or grading of significance is made of these areas relative to an objective benchmark or to each other. This exercise needs to be taken a step further (similar to LANDMAP) to enable it to be used effectively for assessing a proposed development.

- 4. In this draft we have chosen not to have a section on ‘Understanding heritage Values’ and ‘Assessing Heritage Significance’, which appears in English Heritage’s Conservation Principles. Are the explanatory paragraphs under Principle 2 sufficient to enable you to describe the significance of a place, or do you require additional guidance? Would it be helpful to have additional explanation in this document, or have a worked example available on Cadw’s website?**

RTPI Cymru would recommend having further guidance in this document. There should also be clear signposting to the English Heritage appropriate sections. It would be helpful to extract these and make them available as stand alone guidance, so that it is clear which parts of the English Heritage documents are being used in Wales.

- 5. Are Cadw’s Conservation Policies and Guidance laid out and explained clearly? Please identify any parts of the text that you find hard to understand or that remain unclear.**

Accompanying guidance to assist community groups would be helpful; the Conservation Principles and their guidance contain concepts and definitions which may not be easily understandable to those not working in this environment.

It would also be helpful to set out whether the Welsh Assembly Government will be applying the Conservation Principles to all of its heritage / historic assets, not just those managed by Cadw.

6. Can you suggest any alterations or additions to Conservation Policies and Guidance?

See the comments under question 2; RTPI Cymru believes that there should be guidance on adapting historic buildings and places to adapt to climate change and also how to mitigate the effect of the operation of the assets on climate change, in line with the Assembly Government's Climate Change Strategy and Action Plan.

RTPI Cymru and the National Trust are holding a joint seminar in November 2009, to discuss these issues. Further activities, through events and guidance, which encourage and enable the sharing of experiences and good practice should be encouraged.

In addition, further guidance is required covering the relationship of historic conservation to protected environmental landscape areas, habitats and species.

7. Cadw is preparing a set of case studies, with examples from the full range of heritage assets, to illustrate past best practice from which Conservation Principles derives. How do you think that these case studies would be best disseminated? Do you know of further examples, which you feel would make good case studies?

Electronic based dissemination is recommended, principally via websites, but also CD-Rom. RTPI Cymru would be pleased to provide links from our web-pages and also promote the materials through our quarterly newsletter, Cynllunio, which reaches all of our members across Wales.

8. How best can Conservation Principles be integrated into your areas of responsibility or working practices?

Integrating the Conservation Principles into Local Development Plan policies would be the most effective way of applying them in planning. Further clarification and guidance on their application in the context of the development management process is recommended, as set out under Question 1.

I trust you find the Forum's comments helpful. Please do not hesitate to contact me should you require any further clarification. The Forum has no objection to these comments being made public.

Yours sincerely,

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