

Number: WG28966



Welsh Government
Consultation – summary of response

Proposals for secondary legislation to support the
Historic Environment (Wales) Act 2016 and
various best-practice guidance documents

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
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Introduction

1. The Historic Environment (Wales) Act 2016, which received Royal Assent on 21 March 2016, was enacted to make important improvements to the existing systems for the protection and management of the Welsh historic environment.¹ It will also stand at the centre of an integrated package of secondary legislation, new and updated planning policy and advice, and best-practice guidance on a wide range of topics. Taken together, these will support and promote the careful management of change in the historic environment in accordance with current conservation philosophy and practice.
2. This entire suite of legislation, policy, advice and guidance has been planned in light of the seven goals set out in the Well-being of Future Generations (Wales) Act 2015.² Those well-being goals give public bodies a shared vision of ‘the Wales we want’ towards which they can work.
3. Between 11 July and 3 October 2016, the Welsh Government conducted a twelve-week public consultation on several proposals for secondary legislation to support the Historic Environment (Wales) Act and a number of draft best-practice guidance documents. This report summarises the contributions to that consultation and sets out the Welsh Government’s responses.
4. In the best-practice guidance, there are numerous references to new planning policy and advice developed to complement the Historic Environment (Wales) Act. The draft of a revised historic environment chapter (chapter 6) for *Planning Policy Wales* was the subject of a consultation that closed on 12 June 2016. The report on that consultation has now been published³ and the final version of the chapter issued.⁴
5. Alongside the consultation that is the subject of this report, the Welsh Government also consulted on a draft of *Technical Advice Note 24: The Historic Environment*, a new statement of planning advice that will replace outdated Welsh Office circulars.⁵ A number of respondents replied to both consultations and there was some cross-referral in the answers. A report on the consultation on *Technical Advice Note 24* will appear in due course.

The consultation

6. This consultation sought the views of respondents on three proposals for secondary legislation required by the Historic Environment (Wales) Act 2016 to:
 - A. set the interest rate for costs accrued from urgent works (question 1);

¹ <http://www.legislation.gov.uk/anaw/2016/4/contents/enacted>

² <http://www.legislation.gov.uk/anaw/2015/2/contents>

³ <https://consultations.gov.wales/consultations/proposed-changes-planning-policy-wales-chapter-6-historic-environment>

⁴ <http://gov.wales/topics/planning/policy/ppw/?lang=en>

⁵ <https://consultations.gov.wales/consultations/proposed-technical-advice-note-tan-24-historic-environment>

- B. establish procedures to claim for compensation associated with temporary stop notices for scheduled monuments and listed buildings (question 2); and
 - C. introduce simplified scheduled monument consent procedures (question 3).
7. It also sought comments on:
- D. a proposal for secondary legislation to require the inclusion of heritage impact statements as part of the application procedures for scheduled monument, listed building and conservation area consents and an associated draft guidance document: *Heritage Impact Assessment in Wales* (questions 4–8);
 - E. draft best-practice guidance: *Managing Change to Listed Buildings in Wales* (question 9);
 - F. draft best-practice guidance: *Managing Change in World Heritage Sites in Wales* (questions 10–11);
 - G. draft best-practice guidance: *Managing Conservation Areas in Wales* (question 12);
 - H. draft best-practice guidance: *Managing Lists of Historic Assets of Special Local Interest in Wales* (question 13);
 - I. draft best-practice guidance: *Setting of Historic Assets in Wales* (questions 14–16); and
 - J. any related matters not specifically raised in the earlier questions (question 17).
8. The consultation was published on the Welsh Government’s dedicated consultation web pages, where the draft guidance documents and a consultation response form were made available for download.
9. The launch of the consultation was announced to Assembly Members in a written statement by the Cabinet Secretary for Economy and Infrastructure on 11 July 2016.
10. A variety of vehicles were used to publicise the consultation. It was signposted on the Culture and Sport pages of the Welsh Government website and on the website of the Welsh Government’s Historic Environment Service (Cadw). Further information was provided on the Historic Environment (Wales) Act pages of the Cadw website. The publication of the consultation, along with that on *Technical Advice Note 24*, was featured in the second issue of Cadw’s ‘Historic Environment Update’, which was distributed to over 600 stakeholders and interested members of the public on the afternoon of the launch. An email reminder was sent out to the same recipients three weeks before the consultation’s close. Welsh Government communications staff also contacted key sector stakeholders to alert them to the consultation and Cadw’s social media channels were used to raise broader awareness of the consultation and issue reminders of its impending closure.

The responses

11. Fifty-four respondents replied to the consultation. A full list is provided in Annex 1, with details omitted where a respondent has requested anonymity.
12. Over three-quarters of the responses (42) were sent from Welsh addresses. While the remaining 12 responses were sent from outside Wales or from undisclosed addresses, virtually all of them reflected clear involvement in the management of the Welsh historic environment and a direct interest in the consultation proposals.
13. The consultation response form asked respondents to select one of seven categories to characterise themselves. Two respondents chose multiple categories and the most suitable was chosen for the purpose of the statistics that follow. A further eleven respondents did not return the consultation response cover sheet and therefore did not categorise themselves. However, the content of the responses or stated organisational affiliations allowed appropriate categories to be identified. Figure 1 presents a breakdown of the responses by category.

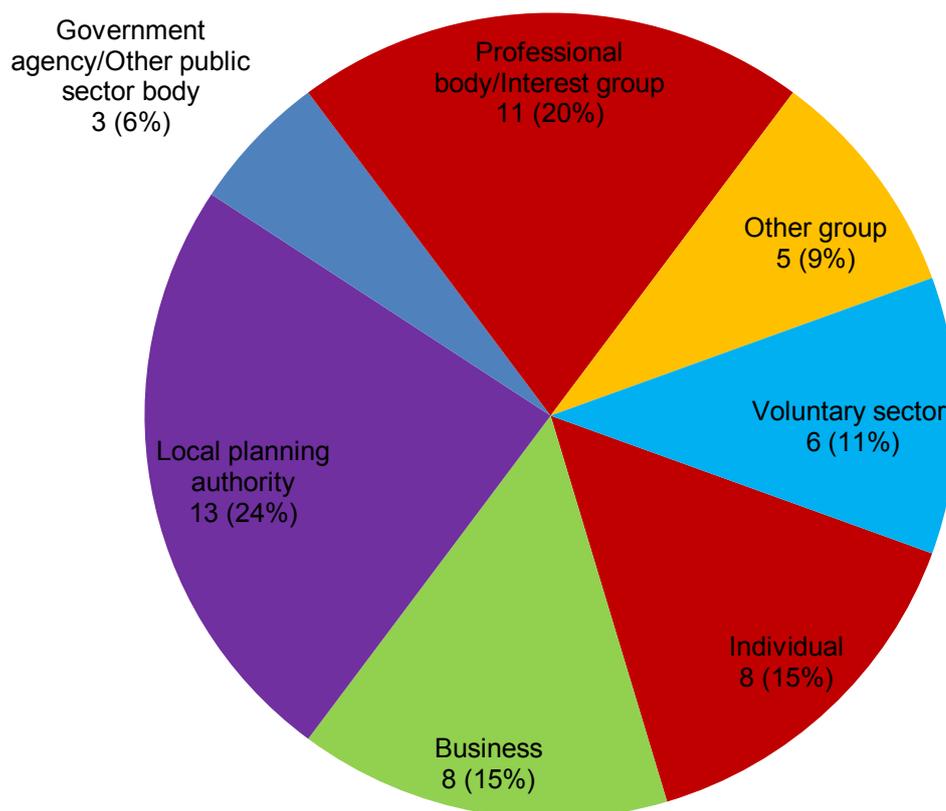


Figure 1. Consultation responses by category.

14. Since the consultation covered a wide range of topics, respondents were invited to disregard any questions that fell outside of their interest or experience. Consequently, there were many null responses for every question, and these have been excluded from the statistics in the detailed analysis of the individual questions that follows.

A. Regulations to set the interest rate for costs accrued from urgent works

Q1.	Do you agree that the interest rate that should be included in regulations is the Bank of England Base Rate plus 2%?
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Yes	No	Yes & No	Comment only	Total
22	5	0	0	27
81%	19%	0%	0%	100%

Summary analysis

15. A large majority of respondents supported the proposal. Two believed the interest rate to be fair. A professional body called the rate 'proportionate' and observed that it mirrored that recently proposed by the UK Government for late advance payments of compulsory purchase compensation.
16. Eight local authorities supported the proposed rate, but one added the proviso that the rate should cover the cost of borrowing. Another remarked that the proposal would introduce consistency amongst local authorities that regularly resort to urgent works, but doubted whether it would lead to their wider use.
17. Amongst the five negative respondents, one local authority and an associated organisation stressed the need for the proposed rate to be high enough to cover the full cost of any local authority borrowing. Both also questioned whether the interest charged would be compound or simple interest.
18. Two other local authorities and a local authority representative organisation considered the proposed rate to be too low. They argued that the rate should be set high enough to act as a deterrent, lest it create a perverse incentive. Owners who had not organised and undertaken urgent works themselves would, otherwise, be rewarded with a cheap source of borrowing.

The Welsh Government response

19. Local authorities only use urgent works as a last resort. The aim is to make the interest rate fair and not punitive. Consideration was given to using the Public Works Loan Board Rate, but public understanding of it is limited and the rate of interest would need to vary dependent upon the life of the loan. It would not, therefore, provide clarity or transparency. Due to the overwhelming support from respondents, the Welsh Government has decided to remain with the proposed Bank of England Base Rate plus 2%.

B. Procedure to claim for compensation associated with temporary stop notices for scheduled monuments and listed buildings

Q2.	Do you agree with the time period in which a claim for compensation associated with a temporary stop notice must be made?
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Yes	No	Yes & No	Comment only	Total
25	2	0	0	27
93%	7%	0%	0%	100%

Summary analysis

20. There was near universal support for the proposed six-month time period. Several respondents commented that it was reasonable and consistent to harmonise the period with that allowed for other compensation claims under the existing legislation.
21. Two organisations representing owners opposed the proposed time limit. One accepted that a time limit is desirable, but remarked that where a building is in commercial use a temporary stop notice could have effects extending well beyond six months. Both supported a time period of at least one year, but one allowed that nine months would still be an improvement.

The Welsh Government response

22. Compensation is to be paid for any loss or damage directly attributable to the effect of a temporary stop notice; this can include breach of contract losses arising from action taken to comply with a notice. In light of all of the responses and the desirability of consistency with other compensation procedures, the Welsh Government will adopt the proposed six-month period for claims.

C. Simplification of the scheduled monument consent process

Q3.	Do you agree with the mechanism proposed for a simplified scheduled monument consent process for uncontentious works?
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Yes	No	Yes & No	Comment only	Total
32	1	1	1	35
91%	3%	3%	3%	100%

Summary analysis

23. Respondents agreed overwhelmingly with the proposed regulations to institute a simplified scheduled monument consent process for minor and uncontentious

works. Many welcomed it as a move to streamline the process and reduce bureaucracy and costs. A number remarked, however, that a clear definition of ‘uncontentious works’ is needed. A few respondents queried whether the simplified consent process would be available for repetitive works.

24. One archaeological organisation answered both yes and no to the question. It regretted that changes to class consents, particularly those relating to agriculture and infrastructure, had not been considered. It was also concerned that the simplified procedure might result in potential misuse and called for careful monitoring of the process to prevent cumulative negative impact.
25. Another archaeological organisation disagreed with the proposed procedure since it might introduce unforeseen risks. Given the significance of scheduled monuments, it considered that any potential impact should be subject to a formal consideration and approval process. Management agreements provide a better route.

The Welsh Government response

26. The Welsh Government is pleased with the overwhelming support for a simplified scheduled monument consent procedures. The system will only be used for minor works, which will be defined in guidance for applicants and inspectors to provide consistency. The use of the procedure will be monitored and reviewed to assess its effectiveness and identify and eliminate any potential for long-term harm to monuments.

D. Heritage impact statements and associated guidance

Q4.	Do you agree that a heritage impact statement should be required for every application for scheduled monument consent (unless otherwise agreed with the Welsh Ministers), listed building consent and conservation area consent?
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Yes	No	Yes & No	Comment only	Total
35	5	0	1	41
85%	12%	0%	3%	100%

Summary analysis

27. A clear majority of respondents agreed with the introduction of a requirement for heritage impact statements in applications for designated asset consents. There was general agreement that heritage impact assessments should be proportionate to the significance of the asset and the scale and nature of the development. Some respondents stressed the need to begin the heritage impact assessment process at the start of any development to ensure that it informs the consideration of options and mitigation strategies.

28. Many respondents, however, qualified their support with comments. A number of consultees asked for clarification on when a heritage impact statement would be compulsory and when it would merely be good practice. Several suggested that the requirement should be extended to include:
- applications for planning permission;
 - all works requiring planning consent in conservation areas;
 - developments affecting World Heritage Sites;
 - developments affecting historic parks and gardens and their settings; and
 - all works affecting the setting of a scheduled monument or listed building.
29. Some respondents noted that the heritage impact assessment process would benefit both consenting authorities and applicants and could profitably be applied to undesignated historic assets. Others, however, thought that it should be made clear that heritage impact statements are not required for historic assets of special local interest. Some consultees noted the importance of ensuring that language and advice are consistent across the new guidance documents.
30. Respondents representing archaeological and ecclesiastical interests called for clarification of the relationship between existing mechanisms for the determination and evaluation of the significance of historic assets and the heritage impact assessment process. One respondent suggested that Cadw and local authorities should be required to provide a briefing document on each site setting out its significance and other matters; this would be similar to the document provided by Natural Resources Wales for a Special Area of Conservation.
31. Amongst those who disagreed with the proposed requirement for heritage impact statements, several felt that they should be best practice rather than mandatory. One respondent suggested that local planning authorities should be given some discretion to waive the requirement. Some maintained that the requirement would be burdensome, particularly for minor works, and could interfere with essential works necessary, in some cases, for public safety. One respondent was not convinced that heritage impact statements alone would provide adequate information for the determination of consent applications in complex cases.

The Welsh Government response

32. In light of the strong positive response to the proposed introduction of heritage impact statements, the Welsh Government will proceed with the required secondary legislation to introduce them into the listed building consent process. This will allow their suitability and effectiveness to be evaluated and provide evidence to inform their potential extension to other historic assets.
33. The associated guidance has been amended to define more clearly when a heritage impact statement will be required. The legislative framework will not allow local planning authorities to have discretion to waive the requirement for heritage impact statements. It would, moreover, be inappropriate since it would lead to inconsistency in required procedures across Wales.

Q5.	Do you agree that heritage impact statements should replace design and access statements for listed building consent applications?
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Yes	No	Yes & No	Comment only	Total
33	3	0	3	39
84%	8%	0%	8%	100%

Summary analysis

34. There was strong support for the proposal to replace design and access statements with heritage impact statements in listed building consent applications. Many respondents highlighted the shortcomings of design and access statements and noted that heritage impact statements should provide information of greater relevance for the determination of applications. However, as with question 4, consultees often qualified their support in their comments.
35. Some stressed the importance of removing the requirement for design and access statements so owners and agents would not be obliged to duplicate work in the preparation of two statements. One respondent suggested that design and access statements would still be needed to support some planning applications involving listed buildings.
36. Several consultees highlighted the variable quality of design and access statements and called for minimum standards for heritage impact statements. Others emphasised that the design aspects of proposed works should still be fully covered in a heritage impact statement and that proper expertise should be drawn upon in its preparation.
37. The need for proportionality in heritage impact statements was reiterated in a number of responses. One respondent expressed concern that the consent process could be delayed if a consenting authority disagreed with an applicant's statement of significance for a listed building. To avoid such situations, the respondent recommended that consideration should be given to introducing statements of significance that have been agreed by the relevant consenting authorities and listed building owners separately from any proposed works.
38. Amongst those who disagreed with the proposal, one respondent suggested that design and access statements and heritage impact statements are fundamentally different and both should be required. Another observed that the level of information provided in a heritage impact statement would be unlikely to match that in a design and access statement.

The Welsh Government response

39. Since many respondents felt that design and access statements failed to take adequate account of the significance of buildings, the Welsh Government will replace them with heritage impact statements in listed building consent

applications. Cof Cymru — National Historic Assets of Wales (<http://cadw.gov.wales/historicenvironment/recordsv1/cof-cymru>), which includes descriptions of all listed buildings and most scheduled monuments, will provide a freely accessible starting point to help applicants understand the significance of their buildings.

40. The guidance on the preparation of heritage impact statements has been revised in light of the comments of consultees. The guidance will be published well before the requirement for heritage impact statements comes into force in order to provide owners, agents and local planning authorities with sufficient time to become familiar with the new procedures.

Q6.	Do you agree that an access statement should be required in any heritage impact statement where the proposed works would alter the means of access to or within a listed building?
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Yes	No	Yes & No	Comment only	Total
32	5	0	0	37
86%	14%	0%	0%	100%

Summary analysis

41. The proposal to require an access statement in any heritage impact statement relating to works that would alter the means of access to or within a listed building met with general approval from respondents.
42. Some consultees noted that access (and health and safety) arrangements can have substantial impacts on historic buildings. Earlier consideration of such arrangements in the design process would be advantageous, since they are often poorly designed afterthoughts. However, the need for proportionality in the preparation of the statements was stressed again.
43. Two respondents representing owners' interests were amongst those who answered 'no' to the question. Although they expressed support for reasonable and proportionate measures to improve access in historic buildings, they objected to any requirement for access statements for listed buildings in the absence of a comparable requirement for equivalent building types. This was particularly true with regard to listed domestic buildings that are neither open to the public nor involved in the provision of services. Another respondent disagreed with the proposal because security concerns generally make public access to its listed buildings inappropriate.

The Welsh Government response

44. The Welsh Government agrees that an access statement needs to be proportionate to the work being undertaken. It also accepts that a separate access statement may not be appropriate for works to a private dwelling.

45. The guidance has been revised to take account of the detailed comments of respondents. It will clearly set out the need to give early consideration to access issues in any building which provides services or to which there is public access.

Q7.	Do you agree with the proposed contents for a heritage impact statement?
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Yes	No	Yes & No	Comment only	Total
32	4	0	2	38
84%	11%	0%	5%	100%

Summary analysis

46. While the greater part of the respondents agreed with the proposed contents for a heritage impact statement, many also offered detailed comments.
47. Several reaffirmed the importance of proportionality. One stressed that no more detail should be required in a heritage impact statement than is 'sufficient to understand the potential impact of the proposal on its significance'. Another asserted that the statement should be proportionate not to the degree of change, but rather to the degree or scale of impact, since even relatively small changes can have a disproportionate effect on significance. One respondent was concerned that a statement of significance would require extensive research and repeated the suggestion that it should be subject to prior agreement between the owner and the consenting authority.
48. Other respondents emphasised the need for clarity about the timing of heritage impact assessments and resultant statements. Since a heritage impact statement will require validation by the local planning authority, one respondent recommended that it should be available at the pre-application advice stage so any need for further detail can be identified.
49. Some respondents believed that the conceptual foundations of the proposed contents could be strengthened. One noted occasional tensions between a significance-based approach and a fabric-based approach in the assessment guidance. Some consultees called for further explanation of the concepts of avoidance, mitigation and offsetting/compensation in the handling of harm to historic assets. A few took issue with the suggestion that harm to an asset might, in certain circumstances, be offset by measures such as creating public access or detailed recording. However, another consultee challenged the presumption that change would inevitably harm an asset and called for recognition that it can sometimes be beneficial.

The Welsh Government response

50. The Welsh Government is pleased that a clear majority of the respondents agreed with the proposed contents for a heritage impact statement. The

guidance has been amended to reflect consultees' detailed and constructive comments. Stress has been laid on the importance of beginning the heritage impact assessment process, so that it can inform plans for change. The guidance now also explicitly recognises that change to a historic asset is not inevitably harmful.

Q8.	Does the guidance, <i>Heritage Impact Assessment in Wales</i>, clearly articulate when, why and how to use the heritage impact assessment process and provide useful advice on the presentation of the heritage impact statement?
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Yes	No	Yes & No	Comment only	Total
26	7	1	3	37
70%	19%	3%	8%	100%

Summary analysis

51. Most respondents agreed that the guidance clearly articulated the circumstances in which the heritage impact assessment process should be used and furnished useful advice on the presentation of a resulting statement, but many offered suggestions to improve the draft text. Some of those suggestions were echoed by those who gave an ambivalent or negative answer to the question.
52. A few respondents were critical of the basic approach. One found the suggested methodology too open, and called for it to be made more robust and accountable. Another criticised the guidance's 'catch-all' approach; while purporting to cover built and buried heritage, it was written overwhelmingly from the built heritage perspective and failed to treat adequately the assessment of the significance of archaeological remains and the likely impacts of works.
53. Some consultees felt that the guidance could be clearer about when the process is required, particularly with regard to planning applications affecting historic assets and to buildings benefiting from ecclesiastical exemption.
54. Several responses asked for greater clarity about the requirement for access assessments and suggested that examples would be helpful. The guidance should state that they will not be needed for most residential dwellings, but only for historic assets where the public visit or services are provided.
55. Some respondents believed that the guidance's language implies that change inevitably causes harm. One called for the possibility of development having a positive or neutral effect to be taken as the starting point, lest applicants think harm is an invariable and acceptable accompaniment to change. Another took issue with the use of 'justification' in the guidance. Although the rationale of the heritage impact assessment process is to avoid harm, the guidance demands justification for all proposals. This is out of keeping with current conservation philosophy, which only requires justification when harm proves unavoidable.

Examples of what would be considered proportionate in an assessment would be useful. Some suggested that a template for heritage impact statements would promote consistency and assist applicants.

56. A number of respondents offered differing suggestions for changes to the proposed order of the heritage impact assessment process. Consultees also voiced different opinions about the table of 'Example Summary Heritage Impact Statements'. One felt that the examples were unhelpful and should be replaced with more detailed scenarios, which should be hosted online by Cadw. Others acknowledged the examples to be useful, but expressed various reservations about their simplicity, aspects of their content and their organisation.
57. One respondent suggested that the guidance should recommend that heritage impact statements can be integrated with an environmental impact assessment, thereby contextualising the heritage impact statement within wider environment and socio-economic effects.
58. The employment of qualified and competent experts was approved by several respondents and a number suggested that the guidance should provide contact details for professional organisations that could help applicants find suitable experts. However, one respondent maintained that there should be no requirement to employ an expert, since it could easily multiply the costs of a simple job.
59. The guidance's encouragement of early discussions with local planning authorities or Cadw during the development of a heritage impact statement was welcomed by several consultees and further guidance to promote such dialogue was suggested. The need for training for local authority planning and conservation staff, developers and owners was highlighted in one response.
60. Other areas where respondents suggested that augmented or further guidance would be helpful included:
 - identification of significance and benefits/disbenefits of proposals,
 - preparation of a good statement of significance,
 - minimum requirements for validation, and
 - objective criteria for the evaluation of any heritage impact assessment

The Welsh Government response

61. The guidance has been improved by taking on board a number of the respondents' comments. Issues relating to language and terminology have been addressed and the assessment methodology has been reorganised and tightened up. The guidance is now clearer about when a heritage impact statement is required and when it is optional. The discussion of access statements has been expanded to clarify the circumstances in which they are needed.
62. The value of additional examples is acknowledged and they will be developed and made available online in due course.

Best-practice guidance documents

E. *Managing Change to Listed Buildings in Wales*

Q9.	Will <i>Managing Change to Listed Buildings in Wales</i> provide useful guidance for the owners of listed buildings and their agents? Do you have any suggestions as to how it can be improved?
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Yes	No	Yes & No	Comment only	Total
27	6	0	4	37
73%	16%	0%	11%	100%

Summary analysis

63. Nearly three-quarters of respondents, including all but one of the local planning authorities that replied, believed that the guidance will be useful for owners of listed buildings and their agents. However, many offered detailed suggestions to improve the guidance, mirroring, in some cases, views expressed by those who gave negative or ambivalent answers to the question.
64. Several respondents remarked that the document was well presented and easy to read. Two, however, criticised the tone as too informal, noting that it was inconsistent with the other guidance under consultation and that it failed to convey the serious nature of the consent regime. Respondents with denominational interests criticised the lack of any consideration of the ecclesiastical exemption system in the guidance.
65. Differences of opinion emerged over the document's fundamental approach to the management of change. Some respondents, generally representing owners' interests, maintained that the guidance did not go far enough in emphasising the importance of sensitive and well-managed change in securing viable futures for listed buildings. Others, largely amenity societies and local authorities, argued that the advice strayed too far from a presumption in favour of preservation.
66. A number of respondents observed that local authorities would need appropriate resources to manage the historic environment and provide the levels of advice and guidance envisaged in the document. Nevertheless, consultees called for greater prominence to be given to the role of authorities as sources of advice, particularly through the vehicle of pre-application discussions. Greater emphasis also needed to be placed on the part played by authorities in cases of unauthorised works and neglect of listed buildings.
67. Consultees noted that the document could offer greater clarity or emphasis in the following areas:
- definition of a qualified and competent expert;

- the importance of recording and appropriate standards;
- circumstances in which listed building consent is needed;
- protected species affected by works; and
- curtilage structures and their significance.

68. Some consultees suggested that much of the detailed information contained in Annex D of Welsh Office Circular 61/96 — Planning and the Historic Environment: Historic Buildings and Conservation Areas (due to be superseded by *Technical Advice Note 24: The Historic Environment*) could be usefully included in this guidance, perhaps as an annex.

The Welsh Government response

69. The Welsh Government wants this guidance to be accessible to a wide audience, so it needs to be easy to understand and positive in its language. It is important that it gives a clear and consistent conservation message. The detailed remarks of respondents have been taken into account in reconsidering and revising the guidance. The aim has been to strike the right balance between the presumption for preservation of listed buildings and the recognition of the importance of sensitive and well-managed change in finding sustainable futures for historic assets.

F. Managing Change in World Heritage Sites in Wales

Q10.	Will <i>Managing Change in World Heritage Sites in Wales</i> be effective in helping decision makers protect the Outstanding Universal Value of Welsh World Heritage Sites?
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Yes	No	Yes & No	Comment only	Total
28	1	0	1	30
93%	3.5%	0%	3.5%	100%

Summary analysis

70. Over 90% of the respondents who gave substantive replies to this question agreed that the guidance will help decision makers protect the Outstanding Universal Values of World Heritage Sites in Wales. A number of consultees welcomed the document and noted that it was well set out and clear.
71. The only respondent who answered ‘no’ reflected that the document differed in content and layout from the other guidance in the consultation and recommended that it should be redrafted to ensure consistency. A few of the positive respondents echoed this view. One local planning authority only offered comment, but found the guidance unsatisfactory. Although it conceded that part 4 was useful, the remainder of the guidance was open to opinion, rather than providing clear direction.

72. A number of consultees offered detailed comments on the text. A few remarked that the guidance could be clearer about who is required to produce and has responsibility for World Heritage Site management plans. The relationship between those plans and planning policy could also be better explained.
73. Respondents felt that the guidance would also benefit from greater clarity on the difference between the 'setting' of a World Heritage Site and a 'buffer zone' and how the impact on each is assessed in the planning process. A few consultees noted the definitions of 'buffer zone' and 'setting' used in this guidance and in draft *Technical Advice Note 24* differed and should be harmonised.
74. A sharper distinction needs to be drawn between heritage impact assessments and design and access statements and the circumstances in which they are required. Some respondents noted that ICOMOS have a heritage impact assessment framework and recommended its use, alongside this guidance, to encourage consistency amongst local planning authorities.
75. A few consultees reflected on the value of supplementary planning guidance in promoting collaboration and consistency amongst local planning authorities, and some suggested that the guidance should strongly encourage, if not require, authorities to adopt supplementary planning guidance for World Heritage Sites in their areas.
76. Consultees also indicated that they would welcome:
- further information on what constitutes the Outstanding Universal Value of a World Heritage Site;
 - criteria for development that would impact on Outstanding Universal Value;
 - more specific direction on when Cadw should be consulted; and
 - more detailed guidance on the elements of a World Heritage Site that will be a 'material consideration' in the planning process.

The Welsh Government response

77. The Welsh Government welcomes the strong support that this guidance received, but has reviewed it fully in light of the many detailed comments. The content and layout have been harmonised with the other best-practice guidance documents. Moreover, the links with *Planning Policy Wales*, *Technical Advice Note 24* and the other best-practice documents have been updated to ensure consistency across the suite of guidance produced to complement the Historic Environment (Wales) Act 2016.
78. The text has been amended to clarify the relationship between the setting and buffer zone of a World Heritage Site. The section on understanding on World Heritage Sites has been expanded to offer more information and the implications of inscription. The guidance also benefits from a tighter discussion of the management of development.

Q11.	Will the guidance assist in the consistent management of World Heritage Sites in Wales, especially those which are located in more than one local authority area?
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Yes	No	Yes & No	Comment only	Total
24	4	0	2	30
80%	13%	0%	7%	100%

Summary analysis

79. In comparison to the previous question on the World Heritage Site guidance, a higher percentage (20%) of respondents answered 'no' or only offered comments. Some repeated or referenced their answers to question 10.
80. Several consultees felt that the guidance is insufficiently clear and detailed for consistent interpretation by local authorities. One respondent conceded that the guidance is good, apart from one 'glaring omission' — any statement of 'positive conservation' in the document; sympathetic change should be welcomed if it will keep historic assets in World Heritage Sites viable and relevant.
81. Nevertheless, the great majority of those who offered substantive replies to the question agreed that the guidance will assist the consistent management of World Heritage Sites in Wales. The guidance 'usefully explains the way in which existing sites are managed across local authority and national borders' and its citation of current Welsh examples is helpful.
82. Many themes that emerged under question 10 reappeared here. The call was repeated for further explanation of what constitutes the Outstanding Universal Value of a World Heritage Site, particularly in layperson's terms to assist planners and applicants. It was also suggested that local planning authorities with an existing or proposed World Heritage Site in their area should produce supplementary planning guidance as part of their local development plan.
83. A few respondents believed that the guidance's effectiveness will depend on individual planning authorities and the availability of resource and resolve to implement it. One noted the desirability of support from the Welsh Ministers, coordination between local authorities and sharing of best practice to promote the consistent management of World Heritage Sites and suggested that the Advisory Panel for the Welsh Historic Environment might play a useful role.

The Welsh Government response

84. The Welsh Government is pleased that the guidance will assist in the consistent management of World Heritage Sites in Wales. In response to the comments of consultees, the discussion of Outstanding Universal Value has been enhanced and greater stress has been placed on the importance of sympathetic design in the management of World Heritage Sites. The call for illustrative examples has been noted and case studies will be made available on the Cadw website in due course.

G. Managing Conservation Areas in Wales

Q12.	Will <i>Managing Conservation Areas in Wales</i> encourage local planning authorities to adopt a consistent approach to conservation areas across Wales? Do you have any suggestions as to how it can be improved?
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Yes	No	Yes & No	Comment only	Total
25	5	0	5	35
72%	14%	0%	14%	100%

Summary analysis

85. Over three-quarters of the respondents (77% including two who only offered comments) believed that the guidance will aid a consistent approach to conservation areas across Wales. Some thought the document to be clear and well presented and believed that it would be a useful 'one-stop' shop for local authorities, the public and heritage professionals. Nevertheless, a number of consultees raised issues and made suggestions to improve the document.
86. Several respondents questioned whether local planning authorities would be able to undertake the recommended appraisals, management plans and regular reviews at a time of limited resources. One consultee suggested that consideration should be given to stripped-down appraisals and management plans or alternative mechanisms for their creation.
87. The frequency of conservation area reviews attracted attention in several responses. In light of current budgetary constraints, a number of respondents asked if it is practical or necessary for local planning authorities to undertake reviews every five years. Some suggested that a ten-year cycle would be more realistic, and one respondent maintained that, if the review period is to be fixed, it should be done by primary legislation.
88. Several respondents highlighted the difficulty of accessing information on conservation areas, appraisals and management plans. Local planning authorities are only required to place conservation area information in the appropriate historic environment record and only some have made it easily available online.
89. One respondent felt that the guidance itself needed to be clearer about what can and cannot be done in a conservation area and recommended the inclusion of pertinent information from the soon-to-be-cancelled Welsh Office Circular 61/96. The guidance should also be open about the additional costs for local planning authorities and owners that may arise from conservation area designation; Welsh Office Circular 61/96 again provides a useful statement.
90. Two respondents understood that the planning system should be sufficient to prevent the loss of buildings of local merit in conservation areas and therefore

found the guidance’s discussion of local listing confusing. Consistent treatment of the matter was needed in this guidance, *Managing Lists of Historic Assets of Special Local Interest in Wales* and *Technical Advice Note 24*. Another respondent had no objection to the use of local listing to support conservation areas, but questioned its practicability and contribution to protection.

91. One respondent representing archaeological interests welcomed the reference to archaeological value as a criterion for defining special interest, but sought more explicit recognition of the potential for archaeological interest (both buried and above ground) to contribute to the special interest and character of an conservation area. Another consultee remarked that the document did not contain any reference to historic landscape characterisation, which can add additional historic context when considering the setting of conservation areas.
92. A few consultees found the guidance to be too generic to be of practical use since individual local planning authorities and conservation officers have different philosophies and the characteristics and needs of conservation areas differ markedly. They also believed that the appraisal methodology is unduly complex and time-consuming when compared to that proposed by Historic England.

The Welsh Government response

93. The Welsh Government welcomes the fact that most respondents believed that the guidance would introduce consistency in the management of conservation areas across Wales. It recognises the pressures that local planning authorities are under and seeks to give them a clear and flexible guidance that will assist them in their specific legal duties relating to conservation appraisals and reviews. The guidance has been reviewed and, where appropriate, revised in light of the comments of respondents.

H. *Managing Lists of Historic Assets of Special Local Interest in Wales*

Q13.	Do the general principles and advice on good practice in <i>Managing Lists of Historic Assets of Special Local Interest in Wales</i> provide sufficient guidance for local planning authorities to set up and use local lists? Do you have any suggestions as to how the guidance can be improved?
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Yes	No	Yes & No	Comment only	Total
23	10	1	4	38
61%	26%	3%	10%	100%

Summary analysis

94. A clear majority of those who responded to the question answered yes, and several welcomed the guidance. However, many expressed reservations about

aspects of the guidance and offered detailed comments on parts of the text. Some of those views were echoed by the 39% of the respondents who answered no or were ambivalent about the guidance.

95. There was recurring concern amongst respondents about the resources needed to create and manage a local list, particularly using the full procedures set out in the guidance. In light of the resource issues, some welcomed the voluntary status of local lists and believed that it merited greater emphasis.
96. A number of respondents approved the suggested involvement of community groups and acknowledged the important contribution that they could make to local listing. However, local planning authorities would still have to commit substantial resources to support such groups and collate and validate any data collected.
97. Several respondents stressed the importance of managing expectations by making it clear that local listing confers no additional protection. A number observed that local listing seemed to create a tiered system, inserting a layer between nationally designated assets and those undesignated assets recorded on the historic environment records. One respondent felt that this could threaten the consideration given to other undesignated historic assets.
98. Some replies considered practical issues relating to the incorporation of local lists into historic environment records. Several respondents remarked that a local planning authority will need to liaise with the relevant historic environment record to ensure that any data supplied is in a suitable format and meets required standards.
99. The sample selection criteria in guidance section 2.2 attracted remarks from several consultees. One queried why the criteria had not been based on or linked to the heritage values in the *Conservation Principles for the Sustainable Management of the Historic Environment of Wales*. A local authority maintained that the suggested social and communal criteria had been framed so broadly that almost every local amenity would qualify. Some felt that the criteria should recognise archaeological potential. A few replies suggested that that local listing should be extended, with historic landscapes, and trees, shrubs and hedges that contribute to local distinctiveness proposed for inclusion.
100. Some respondents advocated systematic surveys to identify assets of special local interest, because ad hoc listing could obstruct the reuse of historic buildings. However, one consultee observed that such a survey would constitute an enormous task for a predominantly rural authority. Two respondents argued that ad hoc listing was an entirely appropriate mechanism for sites identified through development-led archaeological investigation.
101. The guidance's proposed mechanisms for consultation with owners and occupiers and reviews of local listing decisions were generally welcomed. There was some difference of opinion on the proposed grounds for review. While one respondent thought the grounds were rightly limited and technical,

another maintained that it should be possible to review the actual decision, irrespective of new evidence.

102. The guidance on Article 4 directions prompted a number of comments. One respondent voiced surprise that Article 4(1) procedures had not been altered to remove the requirement for confirmation by the Welsh Ministers. One reply stressed the impact that cumulative small-scale changes made under permitted development rights can have on assets of local interest. Only Article 4(2) directions can prevent such changes, but it is questionable whether they can be employed effectively to give protection to assets on a local list.

The Welsh Government response

103. The Welsh Government is well aware of the resource pressures faced by local planning authorities, but seeks to provide a mechanism that will enable them, should they choose, to identify and recognise locally important assets while creating opportunities for community involvement. The aim has been to formulate a flexible methodology that can be easily adapted to meet the individual requirements of local authorities, while introducing consistency and accountability in the approach to local listing.

104. The Welsh Government is pleased that a majority of respondents approved the guidance, though acknowledges that many offered detailed comments on the text. The guidance has been reviewed in light of those responses. The section on development management has been enhanced and, in response to a number of comments, greater consideration has been given to Article 4 directions.

I. *Setting of Historic Assets in Wales*

Q14.	Does <i>Setting of Historic Assets in Wales</i> adequately explain why setting is important and how it should be assessed?
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Yes	No	Yes & No	Comment only	Total
25	10	1	3	39
64%	26%	2%	8%	100%

Summary analysis

105. Nearly two thirds of respondents agreed that the guidance adequately explains the importance of setting and how it should be assessed. A further 10%, who answered ambivalently or only offered comments, were broadly supportive but had concerns about certain aspects. Several consultees, including some who gave negative answers, welcomed the guidance, and a substantial number offered detailed comments on the text.

106. A number of respondents remarked on the definition of setting in the guidance. Three felt that the definition was so vague that it compromised the usefulness of the document. Others noted that the definition had altered from *Conservation Principles* and differed from that used in *Technical Advice Note 24*. A formal definition should be adopted and used consistently throughout all documents.
107. The relationship of setting to significance featured in several responses. Some respondents observed that there is relatively little discussion of the importance of setting and how this supports the significance of assets. One consultee maintained that the guidance fails to recognise that setting can contribute to the significance of historic assets in differing degrees (positive, negative and neutral) or, in some cases, not at all.
108. Some respondents found the guidance's handling of historic (retrospective) and modern settings contradictory. One asked if the objective is 'to recreate the original setting of the historic asset or preserve its modern setting?' This lack of clarity could create very real, practical difficulties for practitioners.
109. One consultee deemed the guidance too restrictive and thought that it could be interpreted to imply that any proposed change to the setting will inevitably have an impact on the historic asset itself. The guidance should recognise that change is only harmful when significance is damaged or lost. It should also make it clear that assessment should be focused on how the significance of a historic asset is affected through development within its setting, and not on the impact on the setting itself.
110. One respondent criticised the guidance's exclusion of registered historic landscapes from consideration, which suggests that they are not historic assets. Three respondents believed that the guidance provides insufficient advice on cultural landscapes.
111. Another consultee advocated closer integration between this guidance and the principles for the sustainable management of natural resources embodied in the Environment (Wales) Act 2016. It would be sensible to produce one unified approach for the landscape as a whole as the distinction created between the historic and natural landscape is completely artificial.
112. One respondent argued for a clearer presumption in the guidance against development that would adversely affect the setting of a historic building, especially when it would undermine the economic viability of a historic house. Another remarked that the guidance does not relate setting to heritage impact assessment.
113. Requests for worked examples appeared in multiple responses. One consultee suggested ongoing publication of guidance and updates on the interpretation of case law with comments from Cadw.
114. Several respondents noted the guidance's recommendation that a 'qualified competent expert' should sometimes be employed, and suggested that

information on accreditations and references to appropriate profession bodies should be supplied.

The Welsh Government response

115. The Welsh Government is pleased with the generally positive reception that *Setting of Historic Assets in Wales* received from consultees. This will give Wales dedicated guidance on this important aspect of the management of the historic environment. Many respondents offered specific and insightful comments and these have been fully considered during the review of the text.
116. In response to a number of comments, the definition of setting has been revisited and expanded. Similarly, the relationship of setting to significance has been more fully explained; it has been made explicit that setting itself is not a historic asset.
117. The opportunity has been taken to address the apparent contradiction between modern and retrospective settings that concerned some respondents. It has also been made clearer that this guidance is not intended to cover the impact of change within the setting of the historic environment at a landscape scale.
118. As elsewhere in the consultation, the Welsh Government accepts that many consultees would have found more specific examples helpful. Case studies will be prepared for online publication on the Cadw website in due course.

Q15.	Does the guidance explain the visual and especially the non-visual components of setting sufficiently?
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Yes	No	Yes & No	Comment only	Total
25	9	0	4	38
66%	24%	0%	10%	100%

Summary analysis

119. Two-thirds of respondents agreed that the guidance gave sufficient explanation of the visual and non-visual components of setting. Some remarked that the guidance was clear and helpful, though others noted that the issues were complex and that non-visual/intangible elements may be significantly more difficult to evidence or justify as reasons for refusal, particularly on appeal. Further explanation of sensory factors in understanding the setting of a historic asset would be useful.
120. A number of the respondents who answered negatively or only offered comments repeated the call for examples to clarify the visual and non-visual components of setting since they are very subjective and open to challenge. One consultee, however, disputed the contribution of 'non-visual components' to setting, stating that their relevance 'remains unclear and ill defined'.

121. Several consultees believed that visual impact needed further consideration. One commented that simply expressing the intervisibility between an asset and the development does not necessarily constitute an adequate assessment of visual impact and noted that this is a particular issue for listed buildings. A specific worked example of a listed building in a settlement — where the setting of the asset is restricted to the immediate streetscape, but the asset has views to a more distant development — would be very welcome. Another remarked that it would be useful to have further explanation of the use of the terms ‘essential setting’ and ‘setting’ and ‘significant views’ and ‘incidental views’.
122. One respondent observed that intrusion from above, for example, arising from the proximity of an airport or the use of drones, had been omitted from the non-visual components of setting.

The Welsh Government response

123. The insightful comments of respondents highlighted a number of issues that were considered when the guidance was revisited. Visual impact on setting has been explored more fully with specific attention given to the assessment of original, changed and modern views to, from and across a historic asset. The issue of aerial intrusion from airports or drones has also been incorporated into the text. Here again, case studies to illustrate visual and non-visual components of setting will be developed and published on the Cadw website in due course.

Q16.	Does the guidance explain how to take the visual and non-visual components of setting into account during the assessment process? Do you have any suggestions as to how it can be improved?
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Yes	No	Yes & No	Comment only	Total
24	7	1	5	37
65%	19%	3%	13%	100%

Summary analysis

124. Just as with the previous two questions on the guidance on the setting of historic assets, virtually two-thirds of the respondents responded positively. In contrast to the previous questions, a slightly smaller percentage (19%) answered no, while 16% only made comments or answered ambivalently. A number of respondents offered detailed textual comments and, in some cases, suggested amendments.
125. A number of issues identified in the responses to the previous questions were raised again. These included:
- the relationship of setting to significance,

- the desirability of worked examples and further guidance on non-visual aspects of setting,
 - the definition of a 'qualified and competent expert' with references to professional bodies and accreditations,
 - the relative neglect of character and characterisation, and
 - the contradictory handling of historic (retrospective) and modern setting.
126. One respondent suggested that the guidance could usefully clarify the objectives of the assessment of setting by directly citing the relevant legislation. The discussion of the analysis of setting should reference *Conservation Principles* because identifying how setting contributes to the heritage values (evidential, historical, aesthetic, communal) of an asset is a recognised methodology and has been acknowledged in case law.
127. A consultee remarked that while expert assessment may be required in some cases, the guidance should stress that it is not needed in all and provide advice on where to draw the line. Another respondent remarked that a list of specialists, — archaeologists, landscape architects, historians and others — who could contribute to owners' assessments or management plans would assist users of the guidance.
128. Some consultees were concerned that setting should not be too restricted or narrowly defined. Long distance implications of proposed developments for heritage assets need to be considered. One respondent suggested that the guidance could helpfully discuss the issue of the distance of a development site from a historic asset when establishing the scope of an assessment on setting. It should be made clear that the scope should not be determined by setting an arbitrary distance from the development. Another respondent criticised the document's annex setting out the criteria for local planning authority consultation with Cadw on planning applications that affect the setting of scheduled monuments. Not only is it unclear why they apply only to scheduled monuments, but they are, in the opinion of the respondent, too prescriptive.
129. One respondent expressed reservations about the guidance's statement that the extent of impact should be quantified in the assessment process. Quantitative analysis may risk the exclusion of qualitative considerations, including why a scheme is or is not harmful. Another respondent voiced strong concerns about the use of terms such as 'positive', 'neutral' and 'negative', and 'severe', 'moderate', 'slight' and 'very slight' in the assessment process. Case law has called this methodology into question in a number of instances. Rather than resorting to such bland terms as 'neutral' or 'moderate', a narrative and qualitative assessment will help a decision maker weigh impact against benefits and understand the finer points of the significance of aspects of setting.
130. A consultee recommended that the assessment process, in particular the attribution of significance, should be better cross referenced with the language of the *Guidelines for Landscape and Visual Impact Assessment*, therefore removing any confusion in this respect. A significance table in the guidance indicating where an assessment fits in terms of the wording within those guidelines would help in defending decisions.

131. One respondent found aspects of the discussion of mitigation to be negative in tone and suggested that mitigation and enhancement should be considered together, thereby giving the balance between mitigation and enhancement greater significance. Another noted that it would be helpful to have further guidance on the circumstances in which offsetting would be required and how this would be treated in the planning application process.

The Welsh Government response

132. The detailed textual comments offered by respondents identified a number of areas where the guidance could be clarified or improved. For instance, the discussion of the analysis of setting now makes express reference to *Conservation Principles* and the guidance it offers on assessing significance. The fact that expert assessment of setting is not always required has been stressed, and types of specialists who may be able to assist with a setting assessment or a management plan have been identified.

133. Consideration has been given to the concerns raised by consultees about the terms used in the assessment process. The hierarchy used to evaluate positive and negative impacts within a historic setting has therefore been simplified to eliminate vague and subjective terms. Mitigation has also been treated more fully.

Q17.	We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please raise them here.
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Summary analysis

134. Twenty-four respondents raised issues in response to question 17. In cases where issues related to earlier questions, they have been considered in the relevant analysis and will not be summarised here.

135. A number of themes relating to the guidance and the management of the historic environment more generally emerged from the responses. Some respondents sought clarification of the status of the best-practice guidance that has been presented for consultation.

136. One respondent noted that references in the guidance to historic assets in the marine and seascape environment could be improved and connected to the UK Marine Policy Statement and the forthcoming Welsh National Marine Plan. Others requested that appropriate references to ecclesiastical exemption and the internal systems of control that administer listed building approval for places of worship in use should be included in this suite of documents.

137. A respondent called for a more integrated approach to the management of the historic environment, which functions in conjunction with and complements the

environment and planning systems, is needed. *Conservation Principles* should be reviewed and revised to take account of new Welsh legislation.

138. Some consultees identified specific matters that, in their opinion, merit attention in measures for the protection and management of the Welsh historic environment. These included:

- Floating maritime heritage — protection should be offered for vessels based in Wales that are registered on the National Historic Ships core collection.
- Monitoring and enforcement to protect listed buildings — current systems are failing to protect listed buildings, which are part of Welsh culture and contribute to tourism and job creation.
- The Theatres Trust — should be made a statutory consultee for listed building consent.
- Historic place names — should be protected as historic and community assets. One respondent suggested that they should be included on local lists and be given protected status under the planning system. Another advocated that they should be included in secondary legislation under the Historic Environment (Wales) Act 2016. *Technical Advice Note 24* should require the consent of the Welsh Language Commissioner before any changes are made to names of places, streets or geographical features.

139. Other consultees took the opportunity to offer general observations on the current management and interpretation of the Welsh historic environment. These included:

- All organisations need to achieve ISO 9001 — Quality Management System, including the Welsh Government and its civil service.
- There should be several local inspectorates within Wales. Their local knowledge and close proximity to historic buildings would make them more effective and relevant.
- Wales needs its own heritage institution, which is completely independent from any English institution. Grants should be carefully considered by this new Welsh heritage institution.
- The Year of Legends has encouraged stories of Welsh historic characters that are Hollywood. There should be an advisory officer to limit the commercial creativity of digital story tellers.
- Traditional versions of history do not do justice to Welsh history from around 325 BC to the conquest by the Romans, Angles, and onwards.

The Welsh Government response

140. The Welsh Government has considered the wide-ranging comments made by respondents in response to this question. It recognises the need for further guidance on the management of the Welsh historic environment, including matters such as the marine historic environment, buildings at risk and ecclesiastical exemption, and is planning additional best-practice guidance for the future. Given the wide range of guidance that will be available, its incorporation into *Technical Advice Note 24* would be impractical.

141. The guiding principle behind the Historic Environment (Wales) Act 2016 and all of the complementary policy, advice and guidance has been the sustainable

management of change in the historic environment. The Welsh Government acknowledges the need for sympathetic change to find sustainable uses for historic assets and has communicated that message in the documents presented for consultation here and will continue to emphasise it in the future.

142. The Welsh Government is creating a statutory list of historic place names in Wales and will issue guidance for certain public bodies on the use of historic environment records, including the place name list, in the discharge of their functions. Taken together, these measures will raise awareness of the importance of historic place names and encourage their continued use by public authorities and private individuals.

List of respondents (organised by category)

The total number of respondents for each category is given in the heading. Each entry gives the number of the consultation response, the name of the individual or organisation responding (unless anonymity has been requested) and the location of the respondent (if known).

Individual — 8		
02	Evan Owen	Dyffryn Ardudwy
03	Richard Ebley	
04	Brian Williams	
05	Gwyn Jones	
06	Andrew Yale	Porthmadog
07	Myfanwy Evans	Newport, Pems.
08	Kenneth J. Richards	Toronto, Canada
41	Alun Lenny	Carmarthen

Business — 8		
15	The Environmental Dimension Partnership	Barnsley, Glos.
17	Heritage Collective Ltd & Archaeology Collective Ltd	London
24	National Grid	Leeds
28	SP Energy Networks	Prenton, Ches.
36	Dŵr Cymru/Welsh Water	Nelson
37	Trysor	Ammanford
40	Lichfields	Cardiff
46	Richards, Moorehead & Laing on behalf of Dorothea Lakes	Ruthin

Local planning authority — 13		
14	Neath Port Talbot County Borough Council	Neath
18	Blaenau Gwent County Borough Council	Ebbw Vale
21	Gwynedd Council	Pwllheli
22	Bridgend County Borough Council	Bridgend
30	Torfaen County Borough Council	Pontypool
31	Ceredigion County Council	Aberaeron
35	Pembrokeshire County Council	Haverfordwest
38	Welsh National Park Authorities (joint response)	Penrhyndeudraeth
39	Wrexham County Borough Council	Wrexham
42	City of Cardiff Council (officer response)	Cardiff
49	Vale of Glamorgan Council	Barry
50	Rhondda Cynon Taff County Borough Council	Pontypridd
54	Newport City Council	Newport

Government agency/Other public sector body — 3		
01	Swansea Museum	Swansea
13	Natural Resources Wales	Aberystwyth
20	The Theatres Trust	London

Professional body/Interest Group — 11		
10	Dyfed Archaeological Trust	Llandeilo
16	Chartered Institute for Archaeologists	Reading
23	Historic Houses Association	London
27	Welsh Local Government Association	Cardiff
33	Our Chartist Heritage	Newport
43	The Law Society	London
44	Royal Town Planning Institute Cymru	Cardiff
47	Council for British Archaeology	York
48	Cymdeithas yr Iaith Gymraeg	Aberystwyth
51	Association of Local Government Archaeology Officers Cymru	Penrhyndeudraeth
53	Association of Local Government Archaeology Officers Cymru (additional response)	Loggerheads Country Park, Denbighshire

Voluntary sector — 6		
09	The Methodist Church	Manchester
11	Glamorgan/Gwent Archaeological Trust	Swansea
12	Cytûn – Eglwysi ynghyd yng Nghymru/Churches Together in Wales	Cardiff
19	Wales Heritage Group	Cardiff
25	Campaign for the Protection of Rural Wales	Welshpool
34	Civic Trust Cymru	Cardiff

Other group not listed above — 5		
26	Clwyd-Powys Archaeological Trust	Welshpool
29	Blaenavon Industrial Landscape World Heritage Site Partnership	Pontypool
32	Glandŵr Cymur, the Canal & River Trust in Wales	Newark, Notts.
45	Gwynedd Archaeological Trust	Bangor
52	Country Land and Business Association Cymru	Presteigne