

The future of our past: Consultation response form

Your views on the proposals set out in this consultation document will make a vital contribution to the further development of the Heritage Bill. Since the consultation treats a wide range of topics relating to the historic environment, you may find that some of the following questions fall outside your interest or experience. Therefore, please feel free to answer as many or as few of the questions as you like.

Please return this form to reach the Welsh Government no later than 11 October 2013.

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2 Identifying significance

Identifying and protecting historic assets of national significance

Scheduled ancient monuments

- P1** To allow the Welsh Ministers to designate sites that provide evidence of past human activity, including artefact scatters and other archaeological deposits devoid of structures or works.

Q1 Do you agree with proposal P1?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
<p>The criteria for designations of such sites needs to be very clear and resistant to misinterpretation; how is the extent of such a site determined? The identification of the boundary on the ground and the communication with land managers needs to be very clear to prevent inadvertant damage to the archaeological resource</p> <p>There is a critical interaction between the protection of our historic environment and protected nature conservation sites.</p> <p>Evidence of human occupation/activity are also protected as SSSI. Numerous caves are selected under the Geological Conservation Review Series which have features of Palaeolithic, Mesolithic and Neolithic interest. For example, Pontnewydd Cave records the oldest human remains in Wales and is a Scheduled Ancient Monument but also a Site of Special Scientific Interest. There are numerous other important cave sites in Wales which are SAMs and SSSI. There is also overlap with Quaternary pollen sites, for example the pollen record at Tregaron Bog records agricultural clearance during Neolithic times.</p> <p>Regionally Important Geodiversity Sites (RIGS) also have a similar overlap with SAMs and Listed Buildings. For example cromlechs such as Din Lligwy and Holyhead Roman Camp.</p>			

Listed Buildings

- P2** To allow new list entries to state definitively that a particular part or feature of a listed building or a structure attached to it or within its curtilage is not of special architectural or historic interest, and therefore is not designated.
- P3** To relax the rules governing the issue of certificates of immunity from listing so that applications could be made at any time.

The future of our past: Consultation response form

Q2 Would proposal P2 improve the existing system for the designation of listed buildings?	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Comment	
<p>Improved clarity on the parts/features of a building that are or are not significant will be helpful to managers to maintain listed buildings, allowing resources and effort to be targeted where they are needed. This should be accompanied by clear guidance on applying conclusions based upon the listed entries.</p> <p>NRW support the geoconservation work of the Welsh Stone Forum who should play a key role in the assessment and management of Scheduled Ancient Monuments and Listed Buildings.</p>	

Q3 Do you agree with proposal P3?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Comment	
No comment	

The future of our past: Consultation response form

Designations — consultation and review

P4 To formally consult owners (where known), LPAs and other parties with a particular interest in a historic building or ancient monument on all applications for designations which are considered by the Welsh Ministers to meet the criteria.

P5 To consider introducing interim protection for ancient monuments and historic buildings that Welsh Ministers are minded to designate.

P6 To create a structure for the review of a decision on the designation of a historic building or ancient monument.

Q4 Do you agree with proposals P4, P5 and P6?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
This is particularly relevant to the management of land on or around a designation. Input into drawing up an appropriate designated area size round a feature would improve it's validity and therefore it's management. Managers knowledge of similar or related features in the area can provide landscape scale benefits to understanding and managing the features.			

Marine heritage

P7 To use the scheduling powers in the Ancient Monuments and Archaeological Areas Act 1979 generally to protect marine historic assets.

Q5 Do you agree with proposal P7?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
We support the proposal to use the scheduling powers in the Ancient Monuments and Archaeological Areas Act 1979 generally to protect marine historic assets on the grounds that it would both simplify the management framework in the marine environment, and also facilitate access to important historical sites.			

Historic areas — general

P8 To establish a unified 'Register of Areas of Special Historic Interest in Wales' that would comprise:

Part 1: Historic Parks and Gardens,
Part 2: Historic Landscapes,

The future of our past: Consultation response form

Part 3: Historic Battlefields.

Q6	Do you agree that an online unified Register of Areas of Special Historic Interest in Wales would be beneficial?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
Please see separate document, (response is longer than comments field).			

Historic areas — parks and gardens

- P9** To consider options for requiring the Welsh Government to maintain and enhance the register of historic parks and gardens (part 1 of the proposed unified 'Register of Areas of Special Historic Interest in Wales') in accordance with the published criteria.
- P10** To explore ways of making successive owners aware of the status of registered parks and gardens.
- P11** To require LPAs to consult Cadw and a nominated amenity body on all planning applications affecting a registered historic park and garden or its setting.

Q7	Do you agree with proposals P9, P10 and P11?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
Arrangements for consultation on planning applications affecting registered parks and gardens and their settings need to be firmer, clearer and with a statutory basis.			
Although local planning authorities (LPAs) are asked to consult Cadw on planning applications affecting Grade I and II* sites by no means all do. Nor do they consult other relevant bodies such as the Garden History Society (GHS) on applications impacting all parks and gardens on the register, however we are aware there are resource issues in this sector.			
We would encourage LPA's to develop strong policies in their local development plans (LDPs) for the protection of the registered parks and gardens and also to develop local lists for sites of more local significance.			

Historic areas — landscapes

- P12** To maintain the register of historic landscapes (part 2 of the proposed unified 'Register of Areas of Special Historic Interest in Wales') and

The future of our past: Consultation response form

establish a mechanism by which new historic landscapes can be nominated or existing areas amended or deleted.

- P13** To include historic landscapes in guidance for the sustainable management of the Welsh historic environment.
- P14** To work alongside colleagues elsewhere in Welsh Government to ensure that the proposed natural resource management approach is effective in delivering the sustainable management of historic landscapes.

Q8	Do you agree with proposals P12, P13 and P14?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
Please see separate document, (response is longer than comments field).			

Historic areas — battlefields

- P15** To create and maintain a register of historic battlefields (part 3 of the proposed unified 'Register of Areas of Special Historic Interest in Wales') and to publish the criteria against which candidate sites are assessed.
- P16** To explore ways of making successive owners aware of register entries.
- P17** To produce planning guidance for the protection and sustainable management of both Tier 1 and Tier 2 sites on the register of historic battlefields.

The future of our past: Consultation response form

Q9 Do you agree with proposals P15, P16 and P17?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
<p>We support the proposal to create and maintain a register of historic battlefields and the publication of the criteria used in determining those battlefields that are represented on the register. To reduce duplication here, please refer to the comments detailed in question 6 to proposal 8 as the key reasons we support this.</p>			
<p>We would question whether tier 1 battlefields should be afforded the same protection as parks and gardens as opposed to historic landscapes, which they are akin to. Could the differentiation between tier 1 and tier 2 be more consistent if aligned with terminology and distinctions between outstanding and special (as in registered landscapes).</p>			
<p>The criteria used to determine a battlefield as either a tier 1 or tier 2 (or other term) needs to be robust as there is a proposed difference in material weight in the planning process between tier 1 and 2. Absolute clarity and transparency reduces potential challenges to the status of tier 1 sites when planning protection is less in tier 2. Similarly, the accuracy and significance of the battlefield boundaries should be clearly articulated for planning purposes. Planning guidance, as proposed in P17 is very much welcomed.</p>			
<p>We would suggest LPAs be required to take all tier 2 battlefields into account in their LDPs and when determining applications where developments may have more than local impact. However, a concern of this level of planning consideration is they are only considered in the planning process if they are of more than local impact, this may omit assessments of proposals that might only have only local impact but the nature of that impact is highly significant, or where multiple local impacts cumulatively result in significant impact.</p>			
<p>We agree with proposal P16.</p>			
<p>Planning guidance explaining how the battlefields register should be used when assessing the effect of major developments on battlefield sites should be a requirement. Consideration of the use of the assessment of the significance of the impact of development on historic landscape areas on the Register, known as the ASIDOHL2 approach, within the guidance and its applicability could be explored particularly if the review of ASIDOHL and the Guide to Good Practice is undertaken with this in mind as suggested in the response to Question 8. It would be useful to produce guidance that advises upon direct and indirect effects, visual effects, key view and sightlines with reference to the battlefield site itself, its setting and landscape context.</p>			

The future of our past: Consultation response form

World Heritage Sites

P18 To explore ways of ensuring that public bodies give appropriate consideration to World Heritage Sites in Wales.

P19 To publish guidance that would help local planning authorities (LPAs) take account of the qualities of World Heritage Sites.

Q10 Do you have examples of instances where, in your view, proper consideration has not been given to the outstanding universal value of a World Heritage Site?			
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Please give details.			

Q11 What functions do LPAs exercise that could affect the outstanding universal value of World Heritage Sites?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Please give details.			
No comment			

The future of our past: Consultation response form

Q12 Could LPAs change the way in which they exercise their functions to contribute positively to the preservation of the outstanding universal value of World Heritage Sites?

Yes

No

Please give details.

World Heritage Sites (WHS) should be included in LDPs supported by robust policies when determining applications where developments may have more than local impact and where proposals may only have local impact but the nature of that impact is highly significant.

The preparation of specific planning guidance on setting and significant views could be used positively and proactively at the pre application stage of the planning process, assisting both developers and decision makers. Guidance could be produced as either national led guidance or as Supplementary Planning Guidance (SPG) by the local planning authority as part of a wider historic environment SPG. English Heritage has existing guidance on 'The setting of heritage assets' and 'Seeing the history in the view', both currently under revision presenting a potential opportunity for collaborative guidance.

World Heritage Sites, like historic landscapes, encompass living, changing and adapting landscapes, conserving the outstanding universal value should be a primary function of local planning authorities with a duty to conserve this value whilst positively guiding and allowing acceptable change. A partnership approach of collaboration and coordination of activity within a management plan and planning policy framework can guide planning and management and monitor the maintenance of outstanding universal value..

Q13 Which decisions made by public bodies other than LPAs are capable of having an impact on the outstanding universal value of World Heritage Sites?

Not all public bodies have a remit that includes the heritage environment, for some it may be part of their remit, for others not at all. Therefore the potential for decisions to be made that may be in conflict with the outstanding universal value of the World Heritage Site is a real possibility. For example, conflicts may arise with other statutory protected interests, for example with statutorily protected sites and species.

The future of our past: Consultation response form

Q14 How should World Heritage Site status rank in decisions taken by public bodies?

World Heritage Sites (WHS) are identified by UNESCO as exceptional places of 'outstanding universal value' of international significance. Without the statutory protection that is afforded to many nationally important heritage assets, these internationally important sites are afforded limited protection, recognition and due regard. The preparation of statements of universal value should inform and underpin planning protection of a suitable status for these internationally recognised sites.

Without wholesale statutory protection, recognition of World Heritage Sites in the planning process needs an absolutely clear understanding of the relative protection afforded to all components including the buffer zone, essential settings and significant views. Also how the World Heritage Sites works and functions as a whole and relates to these component parts. For sites of such universal value there should be full consideration of how these components interact and relate to one another, managed to minimise deleterious effects.

LPA's should take World Heritage Sites into account in their LDPs and when determining applications where developments may have more than local impact and where proposals may only have only local impact but the nature of that impact is highly significant. They should rank alongside National Parks and Areas of Outstanding Natural Beauty and rank above that of Landscapes of Special Historic Interest.

Ecosystem Approach/Natural Resource Planning will provide the opportunity to balance a range of interests and considerations, one of which will be the historic and landscape value and interest of the World Heritage Site alongside other functions and services delivered at that location. How an individual site ranks depends on the situation on a case by case basis but the international significance of these sites should accord them appropriate consideration in written planning policy.

The future of our past: Consultation response form

Q15 Would giving proper consideration to their outstanding universal value be likely to have a significant impact on development within World Heritage Sites or their settings?			
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Please give details.			
<p>Giving proper consideration to outstanding universal value does not automatically mean that change and development is precluded from these sites. Establishing statements of universal value should be a positive step that aids and facilitates appropriate change that fits compatibly in the context of the site allowing the right development in the right place. However, if change is proposed that is wholly incompatible with the heritage interest, scale and/or design and statement of universal value then this should be used in the planning process to object and mitigate in the first instance or refuse if no acceptable resolution is possible.</p> <p>From a woodland point of view decisions that Natural Resources Wales (NRW) could make that could impact on World Heritage Sites are granting new woodland creation schemes, felling licences and forest design. The type of woodland creation approved could have a positive or negative impact depending upon species selected and where it is located in relation to the features of the WHS. Felling licences would change landscape temporarily but the norm is that restocking woodland is a condition of the felling licence, non-restocking would result in a change of land use. Outstanding universal value should be taken into account in making these decisions. Forest Design (Forest Resource planning as it is known now) can compliment the landscape appearance of woodland so if the designers have the understanding of the heritage values then they can consider this in the forest design to achieve a positive outcome.</p>			

Identifying and designating historic assets of local significance

Conservation areas

- P20** To promote, through planning guidance, the use of characterisation as a vital tool in the formulation of proposals for the preservation and enhancement of conservation areas and as the most effective way of undertaking their identification and regular review.
- P21** To merge conservation area consent with planning permission.

The future of our past: Consultation response form

Q16 Do you agree with proposals P20 and P21?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Please give details.			
Historic Character Assessment has provided a useful tool for designing new schemes (predominantly Flood Risk Management Schemes) within Conservation Areas.			
It would be a more streamlined process if conservation area consent were merged with planning permission. We believe it may be possible for there to be situations when work falls within our permitted development in terms of Planning but still needed Conservation Area Consent.			

Historic assets of local significance

- P22** To explore ways in which LPAs can be encouraged and supported to identify historic assets of local significance. This might be achieved through regional collaboration.
- P23** To formulate and publish guidance that would aid LPAs in the preparation of local lists of historic assets by identifying appropriate criteria for assessing significance and establishing a methodology for nomination, consultation, validation and appeals.
- P24** To develop, in partnership with LPAs, model local development plan policies and supplementary planning guidance for the protection and management of historic assets of local significance.
- P25** To prepare guidance to support the use of characterisation studies in the sustainable management of historic assets at a local level.

The future of our past: Consultation response form

Q17 Do you believe that regional collaboration would be effective in identifying and protecting historic assets of local significance?

Yes



No



Comment

Regional collaboration would be effective in identifying historic assets of local significance as a consistent source of information and advice, the collective power of many bodies and organisations whom may be involved in the development of a local list facilitates a degree of participation and partnership, a signing-up to the process, enhanced credibility, awareness raising and making good use of resources and expertise.

However the final identification and protection is most likely to be effective at the local planning authority level as they have the ability to include policies in their Local Development Plan and to produce Supplementary Planning Guidance as a means of additional protection. Producing a regional list is most effective if it is adopted within the consenting authority and used in the development control process and planning framework.

Q18 How could third sector organisations assist local authorities in identifying historic assets of local significance?

No comment

The future of our past: Consultation response form

Q19 What would you like to see in any published guidance for aiding the protection of historic assets of local significance?

Published guidance for the protection of historic assets of local significance should be linked to Local Development Plans to identify areas where special historic policies apply. Guidance should raise the understanding and recognition of locally significant historic assets, detail how assets of local significance have been determined, the criteria used or source of information if reliant upon existing datasets (for example LANDMAP outstanding historic landscape aspect areas).

Guidance should clearly explain how local lists could be used as an additional development control measure specific to the protection of historic assets where the policy objectives may be used as a primary reason for refusal for inappropriate developments.

Guidance should explain the full range of historic assets that can be included, including non-registered historic landscapes, arboricultural heritage, ancient woodlands and veteran trees in the landscape and streetscapes. Guidance should explain how historic assets can be protected through influencing positive historic asset management and planning. For example producing guidance for developments to be in keeping with or enhance historic interest, character or value or to target grants towards conservation of historic assets.

Q20 How can characterisation studies support the identification and sustainable management of historic assets and areas of local significance?

There is a role for evidence based character assessments to inform areas of local significance for local listing, for example Historic Landscape Characterisation, Historic Urban Characterisation and LANDMAP Historic Landscape layers, being mindful not to duplicate entries that are included elsewhere. There is also a role for Landscape Character Assessments to be included as they also take the historic environment into account.

Characterisation studies offer an existing consistent evidence base of historic/historic landscape character, features and cultural sense of place and a methodological approach to identify new areas.

In adopting this wider characterisation and contextual approach it fulfils the whole landscape approach as advocated by the European Landscape Convention (ELC) and the concept that “all landscapes matter” that the UK has signed up to.

Whilst there is a role for characterisation, characterisation should not be a pre-requisite for the identification of historic assets of local significance, characterisation may not be the most appropriate means of identifying some assets and should be seen as an equally valid and robust route to identification.

3 Sustaining significance: Managing change in the historic environment

Heritage partnership agreements

P26 To enable the establishment of heritage partnership agreements (HPAs) between consenting authorities and owners for a programme of permitted works within a fixed period.

Q21 Do you think HPAs would be useful in Wales?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
<p>This would improve the process for managing areas of land which have multiple designated heritage features, this will allow the cumulative effect of changes to be considered together. A woodland management plan, for instance, has a series of operation over a period of years with repeated interventions. A Heritage Partnership Agreement (HPA) would remove the need to seek Scheduled Monument Consent (SMC) or Listed Building Consent (LBC) multiple times. The benefit to the historic environment features is a stronger relationship between land managers and the consenting authority.</p> <p>This partnership approach will allow varied objectives and maintenance requirements to be assessed, whole landscape/ecosystem services approach. Guidance will be required to achieve consistency.</p>			

Improvements to the listed building consent process

P27 To provide greater clarity through guidance on what works do and do not, in the opinion of the Welsh Government, require listed building consent (LBC).

P28 To provide guidance on the sustainable management of listed buildings based on the Conservation Principles.

P29 To promote more widespread use of pre-application discussions as part of the LBC process.

Q22 Do you agree with proposals P27, P28 and P29?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
<p>These proposals appear sensible to help owners understand when to apply for Listed Building Consent and to reduce unnecessary burden on owners/ developers and local authority resources</p>			

The future of our past: Consultation response form

- P30** To enable more LPAs to decide certain LBC applications affecting grade II listed buildings without reference to the Welsh Ministers after allowing them a fixed time to develop professional expertise at officer level and supporting policies and procedures.
- P31** To explore introducing a system that would give applicants a formal assurance that proposed works on a listed building do not require LBC.
- P32** To consider streamlining the LBC approval procedure for works that have no adverse effect on a listed building, its setting or any features of special architectural or historical interest that it possesses.

- Q23** Consultees are asked to discuss the merits of proposals P30, P31 and P32, giving particular regard to:
- whether they would offer sufficient protection to historic buildings,
 - the extent to which they would reduce the numbers of LBC applications,
 - the extent to which they would speed up the determination of LBC applications, and
 - any risks that they might introduce.

Proposal 30 - Greater professional expertise within LPAs will give greater confidence in the process and removing additional steps will improve the timeframe so welcomed.

Proposal 31 - This is a useful approach to reassuring owners that what they propose doesn't require consent and therefore will reduce the number of unnecessary 'just to be on the safe side' applications.

Proposal 32 - The streamlining of the procedure seems sensible given the pressures on LPAs. In the suggested model presumably the cost of appointing an independent Listed Buildings expert will be on the developer and they will need to balance the benefits in time against the additional costs. Would a pre-application discussion identify this as an option for the applicant?

- Q24** What kinds of works would have no adverse affect on the character of a listed building and could be subject to a streamlined LBC system?

No comment

- Q25** Are there any other measures that would help to overcome present weaknesses in the system?

No comment

The future of our past: Consultation response form

Listed places of worship and ecclesiastical exemption

P33 To update the Ecclesiastical Exemption (Listed Buildings and Conservation Areas) Order 1994 and the guidance on works that are, in the opinion of the Welsh Government, covered by the exemption.

Q26 Do you agree with proposal P33?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comment No comment			

Unauthorised works to listed buildings

P34 To consider introducing a power for LPAs and the Welsh Ministers to issue a temporary stop notice for unauthorised works on a listed building.

P35 To explore ways to ensure that fines issued by magistrates' courts will act as effective deterrents to unauthorised works.

Q27 Do you see merit in introducing temporary stop notices in Wales?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment This would provide protection in the circumstances described but there is a risk of compensation claim for delays to work if the stop notice does not result in enforcement action.			

Q28 Can you give examples of occasions when such a notice would have been useful?			
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Please give details.			

The future of our past: Consultation response form

Q29 Can you give examples of fines imposed by magistrates for unauthorised works to listed buildings that were, in your opinion, inadequate?	
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Please give details.	

Q30 Would higher fines act as an effective deterrent to unauthorised works to listed buildings?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Comment	
No comment	

Historic buildings at risk

P36 To promote collaborative working across the Welsh Government and other public services to find imaginative solutions for vulnerable and at risk listed buildings in future regeneration and housing renewal projects.

P37 To complete and review regularly the all-Wales condition survey of listed buildings.

P38 To develop joint working between the historic environment conservation services of LPAs to promote best practice and support effective enforcement action.

P39 To target any available funding towards historic assets most at risk.

P40 To extend the use of urgent works notices to occupied buildings, unless they are in residential use.

Q31 How can proposals P36, P37 and P38 be best implemented?
The condition survey needs to include an analysis of the potential use/benefits that are likely to help inform prioritisation for targeting funds.

The future of our past: Consultation response form

Q32 Do you agree with proposal P39?			
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Comment			
<p>A balance of resource required against benefit gained for future generations/ social benefits is needed rather than simply targeting the most at risk. Some Listed Buildings are at risk because they are in extremely poor condition, the resource required to safeguard them could be very high and their potential use very low. Strategic planning may indicate that better use of that resource would be to safeguard one or more other Listed Buildings that are not at such a high risk and give greater benefits.</p>			

Q33 Would it be useful to extend the scope of urgent works notices to include occupied buildings, provided they are not in residential use?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			

Scheduled ancient monuments

- P41** To look at options for introducing measures similar to listed building enforcement notices and (if required) the proposed temporary stop notices to allow action to be taken against unauthorised works to scheduled ancient monuments or breaches of SMC.
- P42** To consider extending the Welsh Ministers' current powers of entry so that they may allow nominated persons to undertake archaeological excavation and recording of a monument damaged by unauthorised works, or at risk of imminent damage or destruction, without the owner's consent.
- P43** To allow the Welsh Ministers to refuse to determine an SMC application where a similar application has been made in the past two years, or on land which, or by an applicant who, has undischarged conditions from an earlier SMC.
- P44** To enable the Welsh Ministers to issue SMC for works already executed.
- P45** To remove the automatic right of applicants to be heard by an appointed person before a decision is taken on an SMC application and allow the Welsh Ministers to employ the most suitable means to determine an application.

The future of our past: Consultation response form

P46 To ensure that Welsh Ministers can issue an SMC and agree variations to that consent by means other than in writing.

Q34 Do you agree with proposals P41, P42, P43, P44, P45 and P46?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comment			
Proposal 41 - Yes, temporary stop notices and enforcement notices instead of the threat of prosecution would be more effective in stopping damage and protecting the historic features.			
Proposal 42 - Conditionally - if the power of entry is applied in the way described in the explanation, ie in rare circumstances.			
Proposal 43 - No - HPAs would serve well in these situations, limited SMC applications would limit reactionary work if for some reason (e.g. actions by a 3 rd party) mean that the original works need to be repeated.			
Proposal 44 - No - Is retrospectively granting SMC the only option here? It is open to abuse if people think that they can get SMC after the event. Would part of the enforcement notice include not remedying the previous action but carrying out beneficial works which will secure the remaining interest?			

4 Reviewing the organisational framework for historic environment services in Wales

Strengthening strategic partnerships

P47 To develop and consult on strategic plans for the historic environment sector at four-yearly intervals, covering each of the key functions in paragraph 4.1: knowledge, conservation and public engagement.

P48 To create a mechanism for the provision of independent expert advice to inform the Welsh Government's historic environment policy and the operational work of those who deliver public historic environment services at a national level in Wales.

P49 To bring together the functions of the RCAHMW and Cadw into a single integrated national historic environment service either within or outside the Welsh Government.

P50 To consider whether to place a requirement on the Welsh Ministers or on any new body outside government delivering the merged service to curate, maintain and enhance the NMRW..

The future of our past: Consultation response form

P51 To consider whether to place a requirement on the Welsh Minsters or on any new body outside government delivering the merged service to survey, investigate and interpret the Welsh historic environment..

P52 To consider whether the Welsh Government should maintain an online, digital, map-based, publicly accessible record on which all nationally designated and registered historic assets would be depicted and described.

P53 To consider whether guidance should formally recognise national standards for Wales for collecting and depositing archaeological archives when undertaking archaeological work in connection with the planning process.

Q35 Do you agree with proposal P47 to develop regular strategic plans for the historic environment sector?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
<p>Yes, regular strategic plans should be developed for the historic sector, but with emphasis on an evolving plan which allows for existing direction and action plans to gain momentum, be implemented and reviewed whilst being responsive to changing drivers, pressures, resources and aspirations.</p>			

Q36 Do you think that four years is the correct interval for the development of such plans?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
How do you think they can best be developed and delivered?			
<p>As in Question 35, four to five years is suitable as an evolving plan where a course can be steered along a still suitably valid direction with no undue pressure to start afresh. Similarly within this timescale a plan can be kept dynamic and up to date should circumstances dramatically change whereby the historic environment requires a more radical change in direction to respond to social, economic and environmental needs.</p> <p>A lead body is essential to drive and deliver a strategic plan, but in partnership, with suitable leads committing to ensuring and assisting its successful implementation by working better together, in partnerships and building upon skills and capacity and crossing disciplines to achieve similar outcomes.</p>			

The future of our past: Consultation response form

Q37	Do you agree that there should be a new historic environment advisory panel?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If so, what would you see as the key roles for the proposed panel?			
<p>Provision of professional, academic and technical expertise from within the historic environment but also from outside of the sector drawing in experience from influential disciplines.</p> <p>Experts from within and outside of the sector to raise awareness of emerging areas of potential concern, horizon scanning role and to flag up potential conflicts of interest</p> <p>To bring fresh perspectives unconstrained by organisational remits, impartiality or political constraints</p> <p>To bring more than a national perspective, but also a European and international historic environment perspective.</p> <p>To provide balance and reality to direction of effort, resources and work programmes</p>			

Q38	Can you suggest ways of ensuring that the panel provides the impartial arm's length perspective, where this is required, in relation to the delivery of public historic environment services at a national level in Wales?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Please elaborate.			
<p>Clarity over potential conflicts of interest affecting impartiality</p> <p>Panel members unconstrained by organisational remits or political constraints</p>			

Q39	What do you believe would be the most effective operating model for the delivery of an integrated national historic environment service (proposal P49)?		
Please elaborate.			
No comment			

Q40	Do you agree that proposals P50 and P51 would provide effective protection for the current key functions of the RCAHMW?		
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If not, what other measures do you believe could be considered? What issues might arise?			
No comment			

The future of our past: Consultation response form

Q41 Do you agree with proposal P52?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment			
Provide significantly improved access for all, easier to keep up to date, raise awareness of the entirety of nationally designated and registered historic assets, reduce the potential for overlooking entries. A facility to download digital reports, maps, GIS datasets and maps would be excellent .			

Q42 Do you agree with proposal P53			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comment			
No comment			

Delivery of historic environment services at a regional and local level

P54 For the Welsh Ministers to work with the Welsh Local Government Association in encouraging the establishment of formal agreements between groups of local authorities, facilitating greater collaboration in the provision of historic environment conservation services.

P55 To consider whether there are appropriate mechanisms to put the HERs on a more formal basis in order to secure their continuation.

Q43 Do you agree with the need to establish more formal agreements between groups of local authority conservation services?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comment			
No comment			

Q44 Do you agree that such agreements should cover the areas suggested in 4.43 above?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
What other areas might such agreements cover?			
No comment			

The future of our past: Consultation response form

Q45 Do you agree with proposal P55?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If so, how can this be achieved?			
No comment			

Supporting the third sector in providing pan-Wales historic environment services

P56 For the Welsh Ministers to explore ways to encourage and support the establishment of a membership-based umbrella organisation to support the network of voluntary and non-governmental heritage organisations in Wales.

P57 For the Welsh Ministers to explore the possibility of the establishment of a national heritage preservation trust or network of regional Welsh heritage preservation trusts.

Q46 Do you agree with proposal P56?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If yes, what form do you think such a network might take and how do you think it could be funded?			
No comment			

Q47 Do you agree with proposal P57?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
What form do you think such a trust or trusts could take and how could funding be provided?			
No comment			

Q48 We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please raise them here.
Historic Seascape Assessment and its role in Marine Spatial Planning programme

The future of our past: Consultation response form

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here.