



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Paul Lewis		James Caird
Planning Policy Branch		Consultant Consultations Co-ordinator
Planning Division		IHBC Business Office
Welsh Assembly Government		Jubilee House
Cathays Park		High Street
Cardiff CF10 3 NQ		Tisbury
		Wiltshire
		SP3 6HA
16 October 2009		Tel (01584) 876141
		Web site www.ihbc.org.uk
		E-mail consultations@ihbc.org.uk
Dear Mr Lewis		
TAN6 PLANNING FOR SUSTAINABLE RURAL COMMUNITIES		

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. The Institute is pleased that up-to-date policy for rural Wales is to be published and are generally pleased with the content of the draft.

However, we feel that there are a few shortcomings which might be addressed.

1. Whilst landscape issues feature widely in the document, no reference is made to the European Landscape Convention, or to using Landscape Appraisal or Historic Landscape Characterisation as tools for analysis and management of the landscape.

The Register of Landscapes of Historic Interest in Wales, supported by Cadw and CCW, is a key component in managing the wider landscape. The *Historic Landscapes Register* and these characterisation exercises fully acknowledge the dynamic and evolving nature of the landscape. They promote the view that protecting the legacy of the past in the landscape is not to be achieved by preventing change or fossilising the landscape but rather by informing the process of change, creating tomorrow's landscapes without necessarily sacrificing the best of yesterday's. Lack of acknowledgement in the TAN undermines their role in the development control process.

2. We regret the narrow definition of sustainability purely in terms of energy rather than location or embodied energy. We feel much more could be made of the fact that historic places, which were built to serve a low-energy society, have a large contribution to make in achieving sustainability for rural Wales. It is only by

emulating the best features of the social and economic frameworks of historic communities can a more sustainable future be achieved.

3. We can see little reference to how the historic environment in rural areas often helps to define place and supports local communities in defining themselves and working for their own sustainable future.
4. We would like to see better advice on the design and location of modern agricultural buildings, particularly where these are proposed within the setting of listed farm buildings and in the landscape generally. Too often the siting, colour and scale and inappropriately close proximity to listed buildings such as farmhouses adversely affects their setting. Planning policy does not accept such impacts in the case of other developments and we believe that more care is required in the case of agricultural buildings in the important interests of landscape protection acknowledged in the TAN.

Tan6 needs to reinforce Tan12 on the value of high quality design that respects its context and local distinctiveness. Suitable cross-references should be provided.

5. We would like to see TAN6 tackle the abandonment of farmsteads and how these former homes could provide part of the solution for housing needs.

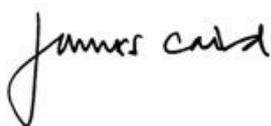
This is key to meeting two different needs of the rural economy. Many existing farmsteads lie unoccupied and deteriorating because planning policy only encourages their reuse as a business use (i.e. holiday homes) when rural Wales has an affordable housing crisis. By utilising the decaying asset of historic buildings to relieve housing need two policies objectives could be achieved, giving families a place to live within conserved historic buildings. This could be achieved within the framework of exception site and rural enterprise policy. Clearly there may need to be appropriate financial support and this support needs to reflect the realities of historic building conservation.

6. We would like to see Tan6 encouraging local authorities to create flexible planning policies to ensure the reuse of historic buildings rather than the ongoing decay we too often see.

Rural exception policies should be extended to the reuse of listed buildings to achieve wider policy objectives. This would provide double benefit as the number of listed buildings at risk in rural Wales is on the increase.

We hope these comments are of use.

Yours sincerely



James Caird
Consultant Consultations Co-ordinator