

**Subject:** Fwd: Draft Guidance on Urban Characterisation - Wales

**From:** James Caird

**Date:** 14/07/14 16:06

**To:** diane.williams@wales.gsi.gov.uk

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Dear Diane

I was sent a copy of your draft Guidance by Trefor Thorpe, I understand at your behest. I have conducted a limited consultation amongst our Panel with a Welsh interest.

The IHBC strongly supports the production of sound advice that will help improve the understanding of place and the historic environment to strengthen planning and community outcomes.

We think the Cadw proposal is timely and broadly endorse the approach taken. But we have the following comments:

- A considerable point of background to the initiative is the dwindling resources of LPAs to handle their statutory workload. This means less time available for systematic appraisal and a greater likelihood of "seat-of-the-pants" decision making.
- It follows, therefore, that any Guidance to aid contextual should be clear and to be seen as an easily accessed tool to improving assessments and producing coherent results. It needs to be the natural recourse of planning applicants, communities and LPAs alike.
- One difficulty with this aspiration is that there is quite a lot of guidance already in existence; not least that produced by English Heritage. While we appreciate the need for the Welsh context to be respected, the introduction of a new set of Guidance will add to the range of resources available to those working on both sides of the border such as the agents of prospective planning applicants.
- We think that the Cadw Guidance should follow as far as possible the best of guidance available. Some of this is mentioned in the draft as background material, but consistency is key. There needs to be a minimum of potential for competing models of best practice and this in turn means the greatest possible degree of shared concepts and terminology. Where there is a need for specific Guidance for the Welsh context, its background should be explained.
- To be properly effective the Urban Characterisation Guidance needs to be embedded in local planning policy. A crucial aspect, therefore, is the way in which it facilitates the production of local guidance which can be adopted as supplementary planning guidance, and be required for use at appropriate levels in the development management process.
- Our panel has suggested Staffordshire Extensive Urban Surveys, the Chester City Centre and Approaches Characterisation Study, and the recent "From Markets to Metroland" Buckinghamshire and Milton Keynes Historic Towns Project, as good examples of how this might be achieved.
- The Guidance does not mention structures for the approach to urban characterisation. We think that it should promote the use of GIS data as a basis for building up a portfolio of guidance for an area. This would help to build an incremental approach that could be developed as and when necessary or affordable, or as studies associated with planning applications are received.
- Planning processes are now so computer-dominated that paper, and even pdf-based, guidance is a weak approach to policy and guidance production. Much better are web-based approaches which allow the user to navigate through a hierarchy of issues to the specific advice they seek. The pressures on professional time on both sides of the planning process are such that few have time or inclination to read through pages of written text in the hope that they will find what they are looking for, however well this may be indexed. We therefore advocate this approach for the Cadw Guidance itself and as a methodology for producing local guidance.

We hope these comments are helpful.

Best wishes

James Caird

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