



Design Consultation
Planning Policy Branch
Planning Division
Welsh Government
Cathays Park
Cardiff CF10 3NQ

15 January 2015

Dear Sir / Madam,

Consultation on Design in the Planning Process

Thank you for the opportunity to comment on this consultation paper.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (ClfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves. The Institute was granted a Royal Charter of Incorporation on 03 June 2014

ClfA has over 3,150 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

ClfA's Wales / Cymru Group has over 300 members practising in the public, private and voluntary sector in Wales.

Design in the Planning Process

General

CIfA welcomes Welsh Government's commitment to achieving the delivery of good design in the built and natural environment.

In this regard CIfA is concerned to see that the historic environment and the likely impact of development upon it are fully taken into account in assessing development proposals, whether through Design and Access Statements, other mechanisms or a combination of both.

The Institute is aware of the related work undertaken by Welsh Government in relation to the historic environment (touched on under the heading 'heritage' in paragraph 24 of the consultation paper). If the Heritage Bill introduces a requirement for heritage impact assessments (however termed) consideration will need to be given to how this relates to Design and Access Statements insofar as the latter are retained as part of the planning system.

At present desk-based assessments in relation to the historic environment and archaeological field evaluations are covered by professional standards (see <http://www.archaeologists.net/codes/ifa>). CIfA would wish to see any future requirements for archaeological assessment of impact upon the historic environment (whether through heritage impact assessments, Design and Access Statements or otherwise) subject to a requirement that relevant assessments should be carried out in accordance with CIfA Standards and guidance.

Specific Questions

Q1 Is the planning system effectively delivering the five key objectives of good design? Give reasons for your answer.

1.1 No comment, save that 'environmental sustainability' should not focus predominantly on natural resources but should fully embrace the historic environment.

Q2 Do you agree that a national development management policy on design would be beneficial?

2.1 Yes.

Q3 Are area and site specific plans, such as masterplans, being used to positively plan for key development? Can you highlight areas of good practice?

3.1 No comment.

Q4 Do you agree that the Welsh Government should produce practice guidance on the process of site analysis to inform the development of well designed proposals?

4.1 Yes. This should fully embrace analysis of the historic environment.

Q5 How can we ensure that pre-application discussions assist in the improvement of design quality and inclusive access of development?

5.1 In relation to the historic environment, by encouraging the early production of historic environment desk-based assessments in accordance with professional standards (<http://www.archaeologists.net/sites/default/files/node-files/DBA2012-New Format.pdf>) along with any other evaluations or assessments as appropriate.

Can you highlight areas of good practice?

5.2 No comment.

Q6 Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?

6.1 In relation to the historic environment, the consistent application of professional standards in the design of development.

Q7 Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?

7.1 No comment.

Q8 What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?

8.1 No comment.

Q9 How can the PAIS and DCfW mainstream good design and inclusive access in the planning process?

9.1 In relation to the historic environment, the starting point should be to ensure that the PAIS contains, or has access to, appropriate historic environment expertise.

Q10 How can we continue to raise the design skills of local authority officers and members and what further specific training is required?

10.1 Basic training in relation to the historic environment for officers without historic environment expertise and members would be helpful.

Q11 Is there scope for local planning authorities to work differently or more collaboratively on design issues? Do you know of any existing activity in this area?

11.1 No comment.

Q12 Can you highlight areas of good practice, from Wales or elsewhere, relating to any of the above, which promote and/or lead to the achievement of good design and inclusive access?

12.1 No comment.

Q13 Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?

13.1 There needs to be some mechanism, or mechanisms, to ensure that the historic environment and the likely impact of development on it are appropriately considered in dealing with any application. If Design and Access Statements contribute to this end in relation to any particular applications, then they should only cease to be required if there are other mechanisms in place to ensure that the historic environment is fully considered.

Q14 Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.

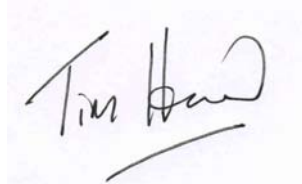
14.1 See paragraph 13.1 above.

Q15 We have asked a number of specific questions. If you have any related issues or ways which design can be improved through the planning system which we have not specifically addressed, please let us know.

15.1 No comment.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor