3 June 2019

e-mail response sent to: historicenvironmentleg@gov.wales

Dear Sir/Madam,

Response to: Managing the Marine Historic Environment of Wales

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales. We welcome the opportunity to provide a submission in response to the above consultation.

We welcome improved links between land and sea and are pleased to note that Managing the Marine Historic Environment of Wales will be updated to reflect any changes contained in the Welsh National Marine Plan, once published.

We support closer working and collaboration between the statutory and non-statutory bodies and the opportunities that an integrated approached brings in achieving goals and allowing us to effectively plan for longer term climate change.

Q1. Does part one clearly set out the nature of the marine historic environment and why it is important? If not, please explain how this could be improved.

Part 1 contains a lot of interesting information, and is clear.

The CHERISH project https://rcahmw.gov.uk/services/research-and-recording/cherish-climate-change-and-coastal-heritage-eu-funded-project/, led by the Royal Commission could be an interesting source of information and best practice. "The project targets data and

management knowledge gaps to discover, assess, map and monitor heritage assets on land and beneath the sea. The project is also placing an important role in disseminating the results and developing best practice for future climate change adaptation".

There is often a difficult balance between conservation, preservation, access and tourism. The document could take the opportunity to address this conflict.

Q2. Despite the different legislative regimes, does the guidance make it clear that the principles of our approach to the historic environment are seamless between land and sea? If not, please explain how this could be improved.

While noting that both marine and historic environments do not respect the boundaries set between the different legislative regimes, an illustration might show the different policy boundaries across Wales, including, Local Planning Authorities and their Local Development Plans; Natural Resources Wales Area Statement boundaries; Welsh Government Marine Plan boundaries and national and strategic planning boundaries etc.

Greater links with the land use planning system will require an urgent revision of TAN 14 (Coastal Planning) and TAN 15 (Development and Flood Risk).

The Welsh National Marine Plan and the Wales Marine Planning Portal have brought forward considerably more data resource. However, there are still opportunities for closer integration between the Marine Planning Portal and marine licence systems.

Q3. Will the decision-making framework for managing the marine historic environment, as set out in part three, be clear to both applicants and decision makers? If not, please explain how this can be improved.

We welcome the attempts to improve pre application discussion, engagement and project design within the marine environment.

Q4. Is it appropriate to have both scheduling and protected wreck designation as mechanisms to protect significant wreck sites? If not, please explain how you would change them.

No comment.

Q5. We would like to know your views on the effects that Managing the Marine Historic Environment of Wales would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

No comment.

If you require further assistance, please contact RTPI Cymru at walespolicy@rtpi.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPI
Director
RTPI Cymru