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12 April 2021

e-mail response sent to: <u>HistoricEnvironmentLeg@gov.wales</u>

Dear Sir/Madam,

Response to: Heritage Partnership Agreements

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 26,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,300 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to respond to the above consultation.

We welcome the aims of the agreement in principle, which encourages a partnership approach to the long-term management of historic assets by setting out agreed conservation objectives, identifying actions and a planned programme of works. We support an additional heritage tool which has some clear advantages for parties, however we have the following comments in relation to the general proposal.

Along with partnership buy in, one of the most critical success factors in relation to the agreement will be the resources available to implement it. The consultation states, the parties involved will have to invest time and resources in the development of the agreement. The need for front loading and strong co-operation with partners is clear from the consultation. The best of tools require adequate resources to deliver the best outcomes. We have particular concerns with regard to the capacity and skill set available to local planning authorities (LPAs) in delivering their responsibilities following the reductions in funding available to local authorities. Specialist resources to handle historic environment

workload are known to be under particular strain. The impact of Coronavirus on budgets and spending for many parties involved could create a challenge in setting up and progressing agreements and in particular managing the frontloading aspect of the Agreements. There is a strong case for the Welsh Government to be pro-active in encouraging and supporting LPAs in ensuring that these important services are adequately resourced and initiatives such as Heritage Partnership Agreements can deliver their objectives.

Further guidance would be useful from an enforcement perspective, particularly given the timescales that the consultation suggests that the Agreement could cover. While the draft guidance provides information on the possible need to terminate the Agreement, further guidance and clarification is required should enforcement action be required, particularly in relation to the various enforcement actions and notices including Temporary Stop Notices etc. and the Agreement.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at watespecies.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPI

Director RTPI Cymru