

Our environment, our future, your views

Response to consultation

The Civic Trust for Wales and its associated civic societies promote civic pride as a means to improve the quality of life for all in the places where we live and work and encourage community action, good design, sustainable development and respect for the built environment in the places where we live and work. We have a particular concern with government policy affecting land-use planning, the historic environment, and design in town and country.

The Trust warmly welcomes this stage in the development of the government's Environmental Strategy as a key instrument supporting the sustainability scheme and action plan and the parallel components of the Better Wales agenda. We comment specifically on those elements of the consultation document that connect particularly with our concern for quality and sustainability in the built and historic environment at the same time as we broadly endorse the general approach outlined in the several sections of the document.

Our specific comments and suggestions are as follows:

CC2, 4

The Trust looks forward to the new Transport Strategy. The devil is in the detail and what is important is the ability to measure and respond to progress or otherwise towards targets set in respect of emissions reduction, the balance between public and private transport use, and so on. Amongst the approaches taken, the Trust would welcome a specific focus on the balance between private and public transport usage along major corridors, and proposals that address directly the reduction of private car use for commuting and local journeys in and around major conurbations.

LS1, 2, 3; QL1, 2; MTC 3

- The Trust welcomes the holistic approach taken towards landscape and the recognition within this section of the significance of the historic environment. We believe the approach to the management of the historic environment needs strengthening and that the government needs to take forward with greater urgency the 2003 Historic Environment Strategy report if it is to be a true champion of the historic environment. The contribution that an effective HE strategy could have to sustainable development, economic regeneration, community distinctiveness and pride, and overall quality of life needs greater recognition, and the opportunities to develop this aspect of the cross-cutting agenda within government policy should be highlighted. An Historic Environment Group is in its infancy, serviced by Cadw. The potential for this group to promote connections within government and cross-sectoral partnerships has yet to be exploited.
- A future “state of the Welsh environment report” should take account of the state of the historic environment. Indicators for such an approach need development, but one example might be the extent to which listed buildings in Wales are “at

risk” and an assessment of the scale of resources required to safeguard such structures.

- Amongst the other specific suggestions within the HE strategy report consideration should be given to “impact on the historic environment” – considered holistically, and not simply in relation to buildings or sites with statutory protection or the presence of a conservation area – as a factor in assessing planning applications. This would be a useful topic to be considered in the future development of *Planning policy Wales*.
- There is a requirement for an up-to-date Historic Environment TAN to sit alongside TAN 12 and replace circular guidance.
- It may be appropriate for the strategy to recognise more formally the role of sustainable design in the built environment in contributing to landscape and townscape quality – achieving greater synthesis between the discussion of landscape and quality of life issues.

BIO1, 2; QL4, 5

- Despite the importance of formal and informal green space in Welsh communities, and the potential contribution this makes to biodiversity, local sustainability, health and distinctiveness, the responsibility for this aspect of policy within government, and the interface with local government and the voluntary sector, remains unclear. As a particular action, the Trust would like to see the government give effective consideration to the development of the Green Flag programme in Wales. This promotes the sustainable management of parks and green spaces of all kinds in town and countryside and provides national quality standards (supported by ODPM and CABE) which are welcomed by managers in local government and volunteer groups in local communities.

QL1, 2

- The Trust strongly supports the outcomes proposed in this section, with a particular focus on those promoting high quality urban environments, strong communities, a well designed and sustainable built environment, clean streets and accessible green spaces.
- We would wish our comments in respect of **LS 1-3** also to be taken account of here in conformity with our belief that greater priority needs to be attached to historic environment policy and the resources allocated to its management.
- The Trust has welcomed the ways in which planning policy has been evolved within a consultative framework to reflect Welsh priorities, and has been supportive of the government’s Design Initiative, the production of a Design TAN and the establishment of the Design Commission.
- Civic societies registered with the Trust constitute a significant voluntary sector voice engaging with planning, design and conservation issues at the level of the local community. They have a potentially strong role to play in the community validation of development plans at the same time as they can be supportive for the implementation of effective design and conservation principles in development control. Government’s continuing recognition, through its support, via Cadw, for the Trust’s work with civic societies is welcomed.
- One key concern has to be, however, the extent to which local authorities are resourced and staff to deal with planning issues and strategies from an integrated urban design perspective, and capable of giving effective attention to issues

development, design and conservation issues at the strategic and the development control level.

MTC1, 2, 3:

- The Trust endorses the importance attached to approaches within formal and informal education that can develop public understanding of and engagement with environmental issues. It is sceptical, however, about the extent to which the PSE framework is seen as the key to education in sustainability within the school curriculum. We are concerned also that discussion of sustainability education has tended to focus on green and global issues and to neglect awareness of the built and the local environments. Discussion of the historic environment and of the sustainable design of buildings and places in this context is also extremely limited. We suggest, firstly, that government should promote a truly integrated approach to environmental education, and that in addition consideration needs to be given to spreading good practice that highlights the potential to focus on environmental issues within existing curriculum subject areas and orders (history, technology, geography, art...).
- The role of the voluntary sector – for instance organisations such as civic societies and the Civic Trust – in developing environmental understanding and active citizenship amongst adults is likely to grow and there will be a continuing need to look at mechanisms to support the role of this sector and enhance its dialogue with government.
- Consistent with our suggestions above regarding the content of the State of the Environment report, we believe that Cadw and the Royal Commission on Ancient and Historic Monuments need to be identified as structures contributing to this project. Indicators need to be developed, for instance, to measure risk to structures and sites having statutory protection as well as to take account of the diverse environmental pressures affecting historic landscape and townscape.

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Director

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