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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation Document

## Consultation on a proposal for regulations required by the Historic Environment (Wales) Act 2016 and four guidance documents

Date of issue: **19 October 2016**

Action required: Responses by **13 January 2017**

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

## Overview

This consultation seeks your views on a proposal for regulations to establish procedures for the review of decisions to designate historic assets and draft statutory guidance on the compilation and use of historic environment records. Both are required by provisions of the Historic Environment (Wales) Act 2016.

It also presents three pieces of draft best-practice guidance for your consideration. These have been developed as components of a wider programme to improve the protection and management of the Welsh historic environment that is linked to the implementation of the Historic Environment (Wales) Act 2016.

## How to respond

This consultation will close on 13 January 2017. You may respond by email or post.

### Email

Please complete the consultation response form at Annex 5 and send it to:

[historicenvironmentleg@wales.gsi.gov.uk](mailto:historicenvironmentleg@wales.gsi.gov.uk)

### Post

Please complete the consultation response form at Annex 5 and send it to:

Regulations and Guidance Consultation 2  
Legislation and Policy Team  
Historic Environment Service (Cadw)  
Welsh Government  
Plas Carew  
Unit 5/7 Cefn Coed  
Parc Nantgarw  
Cardiff  
CF15 7QQ

## Further information and related documents

**Large print, Braille and alternative language versions of this document are available on request.**

Historic Environment (Wales) Act 2016  
<http://www.legislation.gov.uk/anaw/2016/4/contents/enacted>

Consultation on chapter 6 of *Planning Policy Wales*, 'The Historic Environment' (closed)  
<https://consultations.gov.wales/consultations/proposed-changes-planning-policy-wales-chapter-6-historic-environment>

Consultation on *Technical Advice Note 24: The Historic Environment* (closed)

<https://consultations.gov.wales/consultations/proposed-technical-advice-note-tan-24-historic-environment>

Consultation on appeals, costs and standard daily amounts

<https://consultations.gov.wales/consultations/appeals-costs-and-standard-daily-amounts>

*Conservation Principles for the Sustainable Management of the Historic Environment in Wales*

[http://cadw.gov.wales/docs/cadw/publications/Conservation Principles EN.pdf](http://cadw.gov.wales/docs/cadw/publications/Conservation_Principles_EN.pdf)

## Contact details

For further information on this consultation, please contact:

[historicensvironmentleg@wales.gsi.gov.uk](mailto:historicensvironmentleg@wales.gsi.gov.uk)

Legislation and Policy Team  
Historic Environment Service (Cadw)  
Welsh Government  
Plas Carew  
Cefn Coed  
Parc Nantgarw  
Cardiff  
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01443 336091 / 01443 336090

## Data protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would

happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

## Introduction

1. This is the second in a series of consultations on proposals for secondary legislation required to implement and support the Historic Environment (Wales) Act 2016 and a suite of associated guidance.
2. The Historic Environment (Wales) Act 2016, which received Royal Assent on 21 March 2016, makes important improvements to the existing systems for the protection and management of the Welsh historic environment.<sup>1</sup> It also forms the foundation for an integrated package of secondary legislation, new and updated planning policy and advice, and guidance on a wide range of topics. Taken together, these support and promote the careful management of change in the historic environment in accordance with current conservation philosophy and practice.

## A programme of consultations

3. Planning policy and advice provide the cornerstone for the management of change in the historic environment through the planning system. A twelve-week consultation on a revised historic environment chapter (chapter 6) for *Planning Policy Wales* came to an end on 13 June 2016.<sup>2</sup> The chapter, amended in light of the consultation responses, will be published before the end of the year. The draft of the new *Technical Advice Note 24: The Historic Environment* was the subject of a further consultation over the summer.<sup>3</sup> It closed on 3 October and an analysis and the final version of *Technical Advice Note 24* will be issued in spring 2017.
4. In parallel with the consultation on *Technical Advice Note 24*, we sought views on several proposals for regulations and best-practice guidance documents. We are now considering the responses and aim to introduce the regulations and publish final versions of the guidance in spring 2017.
5. Further consultations will take place in 2017 on additional proposals for secondary legislation to implement provisions of the Historic Environment (Wales) Act 2016 and further guidance documents.

## The present consultation

6. This consultation covers five subjects:
  - A. Proposal for regulations under the Historic Environment (Wales) Act 2016 to set out procedures for a review of a decision to designate a scheduled monument or listed building (paragraphs 9–54)
  - B. Draft statutory guidance for certain public bodies — *Historic Environment Records in Wales: Compilation and Use* — as required by the Historic Environment (Wales) Act 2016 (paragraphs 55–60)

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<sup>1</sup> <http://www.legislation.gov.uk/anaw/2016/4/contents/enacted>

<sup>2</sup> <https://consultations.gov.wales/consultations/proposed-changes-planning-policy-wales-chapter-6-historic-environment>

<sup>3</sup> <https://consultations.gov.wales/consultations/proposed-technical-advice-note-tan-24-historic-environment>

- C. Draft best-practice guidance: *Managing Listed Buildings at Risk in Wales* (paragraphs 61–65)
  - D. Draft best-practice guidance: *Managing Change to Registered Historic Parks and Gardens in Wales* (paragraphs 66–69)
  - E. Draft best-practice guidance: *Managing Historic Character in Wales* (paragraphs 70–73).
7. The consultation briefly discusses each subject, asks relevant questions and, where appropriate, points to the annex containing the draft guidance.
  8. Since this consultation covers a range of matters relating to the historic environment, some of the questions may fall outside your interest or experience. Therefore, please feel free to answer as many or as few of the questions as you like.

## A. Proposal for regulations under the Historic Environment (Wales) Act 2016 to set out procedures for a review of a decision to designate a scheduled monument or listed building

9. The Ancient Monuments and Archaeological Areas Act 1979 ('the 1979 Act') requires the Welsh Ministers to compile and maintain a schedule of monuments of national importance ('the Schedule'). Similarly, the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act') requires the Welsh Ministers to compile lists of buildings of special architectural or historic interest.
10. The Historic Environment (Wales) Act 2016 ('the 2016 Act') amends the 1979 and 1990 Acts to place new obligations on the Welsh Ministers to consult with the owner and occupier and other appropriate persons when considering the designation of a historic asset as a scheduled monument or a listed building or making changes to an existing designation.
11. The 2016 Act also introduces interim protection to apply the majority of the provisions of the 1979 Act or the 1990 Act to a monument or historic building that the Welsh Ministers propose to designate.
12. Furthermore, if the Welsh Ministers schedule a monument, make a material amendment to an entry on the Schedule, or list a building, the 2016 Act gives an owner or occupier the right, in certain circumstances, to request that the Welsh Ministers review the designation decision.
13. The 2016 Act specifies three review procedures:
  - written representations,
  - hearing, and
  - public local inquiry.

14. The Welsh Ministers will appoint the Planning Inspectorate to undertake all reviews on their behalf. The Planning Inspectorate will decide upon the most appropriate procedure, or combination of procedures, for a review and its determination will be final. The Welsh Ministers will have to make any changes to the Schedule or a list required by a review decision of the Planning Inspectorate.
15. It is expected that the provisions on consultation, interim protection and review will be brought into force in 2017, after the Welsh Ministers have made the regulations needed to establish a structure for reviews.
16. The 2016 Act requires the Welsh Ministers to set out in regulations:
  - the grounds on which an application for a review may be made;
  - the information that must be provided to, or may be required by, the Welsh Ministers in connection with an application for review;
  - the form and manner in which an application must be made; and
  - the period within which such an application must be made.

The Welsh Ministers can also make any other provision in regulations that they think appropriate in connection with reviews.

17. The following paragraphs set out the proposed arrangements for the conduct of these reviews, which are modelled on the existing systems for planning and listed building consent appeals.

## Grounds for review

18. If the Welsh Ministers decide to schedule a monument, make a material amendment to an entry on the Schedule, or list a building, they must serve notice on the owner and occupier. In addition to specifying the date on which the designation takes effect and interim protection ceases, the notice must inform the owner and occupier that an application for a review of the designation may be made to the Planning Inspectorate.
19. The grounds for review must reflect the matters considered by the Welsh Ministers when arriving at a decision to schedule a monument or list a building, which are specified in relevant statutory criteria.

## Scheduled monuments

20. A monument must be of national importance to be scheduled under the 1979 Act, but the Welsh Ministers are not obliged to designate eligible monuments.<sup>4</sup> The grounds for review will be:
  - that the monument is not of national importance;
  - that the scheduled area does not correspond with the extent of the monument; or
  - that there is a factual error in the identification of the site.

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<sup>4</sup> The criteria used by the Welsh Ministers when scheduling monuments are published in annex 3 of *Welsh Office Circular 60/96 — Planning and the Historic Environment: Archaeology* ([http://cadw.gov.wales/docs/cadw/publications/WO\\_Circular\\_60\\_96\\_EN\\_CY.pdf](http://cadw.gov.wales/docs/cadw/publications/WO_Circular_60_96_EN_CY.pdf)).

## Listed buildings

21. The 1990 Act specifies that a building must be of special architectural or historic interest to qualify for listing. The Welsh Ministers must list any building that satisfies the criteria and in arriving at their decision they can only consider matters that relate to the building's special architectural or historic interest.<sup>5</sup> Other matters, such as the cost of the building's upkeep or repair, planning considerations or local importance, cannot be taken into account. The grounds of review will be:
- that the building is not of special architectural or historic interest;
  - that there is a factual error in the identification of the building; or
  - that there is significant additional evidence not previously considered relating to the building's special architectural or historic interest.

<b>Q1.</b>	<b>Do you agree with the grounds of review for designations of scheduled monuments?</b>
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<b>Q2.</b>	<b>Do you agree with the grounds of review for designations of listed buildings?</b>
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### When and how should a review application be made?

22. An application for a review should be sent to the Planning Inspectorate within 3 months from receipt of the designation notice. Since the Welsh Ministers are a party to the review, a copy of the application should also be submitted to them. The Welsh Government's Historic Environment Service (Cadw) will act for the Welsh Ministers in the review proceedings.
23. The application should be made on a form available from the Planning Inspectorate; a website link will be provided in the notice of designation sent to the owner and occupier.
24. An application for a review will require the following information:
- a. the name of the monument or listed building;
  - b. the name and address of the applicant;
  - c. the name and address of any representative of the applicant and, if required, a statement of the address to be used for correspondence relating to the review;
  - d. a statement setting out the grounds for the review;
  - e. the applicant's preference for the procedure for the review;
  - f. a copy of the Welsh Ministers' letter notifying the owner / occupier of the decision to designate the asset; and
  - g. all matters which the applicant intends to raise in the review, including documents and other evidence which the applicant intends to present.

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<sup>5</sup> The criteria used by the Welsh Ministers when listing buildings are published in annex C of *Welsh Office Circular 61/96 — Planning and the Historic Environment: Historic Buildings and Conservation Areas* ([http://cadw.gov.wales/docs/cadw/publications/historicenvironment/WO\\_Circular\\_61\\_96\\_EN.pdf](http://cadw.gov.wales/docs/cadw/publications/historicenvironment/WO_Circular_61_96_EN.pdf)).

<b>Q3.</b>	<b>Do you agree that a request for a review should be made within 3 months of receipt of a notice of designation? If not, what timescale would be appropriate?</b>
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<b>Q4.</b>	<b>Should any other information be required in the review application? If yes, please specify.</b>
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## Review procedure — Written representations

25. On receipt of a valid application, the Planning Inspectorate will notify the applicant and the Welsh Ministers of the review's start date and advise them of the procedure, or combination of procedures, it considers most appropriate for the review.
26. Within one week of receiving notification, the Welsh Ministers will send copies of any submissions received from interested parties during the designation consultation to the Planning Inspectorate and the applicant.
27. The Planning Inspectorate will also notify interested parties that:
  - a review has been started;
  - their previous consultation submissions will be taken into account in determining the review; and
  - further relevant information may be sent to the Planning Inspectorate within four weeks of the start date.
28. The Planning Inspectorate may request information relevant to the review from any person or body. A copy of any additional information received during the course of the review must be given to the applicant and the Welsh Ministers.
29. The Planning Inspectorate may, with the agreement of the owner and occupier, visit the historic asset in question.
30. Within four weeks of the start date, the Welsh Ministers must send a statement of any further matters or information that they wish to have taken into account in determining the review to the Planning Inspectorate and the applicant.
31. Both the applicant and the Welsh Ministers will have until six weeks from the start date to offer comments on any representations received by the Planning Inspectorate. Other interested parties may also offer comments during that time. In exceptional circumstances, the Planning Inspectorate may allow additional time.
32. Once the time allowed for comments has ended, the Planning Inspectorate may:
  - determine the review on the basis of the available evidence;
  - extend the review as necessary to gather further evidence through, for example, historical research or other investigations, provided all parties to the review are notified; or

- decide that a further procedure — a hearing or public local inquiry — is required to inform the determination.
33. The Planning Inspectorate will provide notice of its determination or any need for further investigations or proceedings to the applicant, the Welsh Ministers and all other interested parties.

### Review procedure — Hearing

34. A hearing is a relatively informal process during which the Planning Inspectorate collects oral evidence to inform the determination of a review. The Planning Inspectorate identifies the issues for discussion based on the representations and evidence that it has received.
35. If the Planning Inspectorate decides that a hearing is needed to determine a review, it will notify the applicant, the Welsh Ministers, and any person or body that either has already submitted a representation or may provide additional information that the Planning Inspectorate believes necessary for the determination of the review.
36. The applicant, the Welsh Ministers and any person or body invited by the Planning Inspectorate may appear as witnesses at the hearing. Any person entitled to appear may be represented by someone else.
37. The matters to be considered should be comprehensively specified in the notice of the hearing. While a hearing will ordinarily only address the matters listed, the Planning Inspectorate may allow the consideration of other matters.
38. The conduct of a hearing will be at the discretion of the Planning Inspectorate. It may, for instance, decide to proceed in the absence of a person entitled to appear, or adjourn a hearing to a later date. If an adjournment is announced during a hearing, no further notice to participants will be needed.
39. The Planning Inspectorate may take into consideration written representations or other evidence and documentation received before or during the hearing as long as it discloses the information to both the applicant and the Welsh Ministers.
40. Following the completion of the hearing, the Planning Inspectorate may determine the review or seek further information on matters raised.
41. Once the Planning Inspectorate reaches its determination, it will inform the applicant, the Welsh Ministers and all other interested parties of the outcome of the review.

### Review procedure — Public local Inquiry

42. A public local inquiry is the most formal of the appeal procedures and provides for the investigation into, and formal testing of, evidence,

usually through the examination of witnesses. While not a court of law, the proceedings may seem to be quite similar and legal representatives are often used.

43. If the Planning Inspectorate decides that an inquiry is needed to determine a review, the procedures are broadly similar to those for a hearing (described in paragraphs 35–41 above). Therefore, only significant differences will be detailed here.
44. Since an inquiry is open to the public, the Planning Inspectorate may publicise its subject, date and location as they consider appropriate.
45. If a witness is required to provide a statement fully setting out the arguments and evidence that will be presented to the inquiry, that statement should also list the names and relevant qualifications of any other person who will speak in support or on behalf of the witness and summarise the evidence that will be given. The Planning Inspectorate may ask for further information on matters set out in such statements.
46. Any person entitled to appear at the inquiry (or a representative) may cross-examine any other witness. However, the conduct and procedures of the inquiry remain at the discretion of the Planning Inspectorate.
47. Following the completion of the inquiry, the Planning Inspectorate may determine the review or seek further information on matters raised.
48. Once the Planning Inspectorate reaches its determination, it will inform the applicant, the Welsh Ministers and all other interested parties of the outcome of the review.

<b>Q5.</b>	<b>Do you believe that the procedures outlined are reasonable and fair for all involved in designation reviews? If not, how could they be improved?</b>
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### Award of costs

49. The unreasonable behaviour of a participant in a review — leading, for instance, to late cancellations or postponed determinations — could cause significant delays and inconvenience to others involved. The appeal arrangements for listed building and planning consents, which are generally similar to the review procedures described above, include provisions for the award of costs to deter unreasonable behaviour. Comparable provisions are therefore proposed for designation reviews.
50. Section 322C Costs: Wales of the Town and Country Planning Act 1990 will furnish a template for the regulations to be drafted under the 2016 Act.
51. The Welsh Government's Planning Division is preparing to issue new guidance on what constitutes unreasonable behaviour and the award of

costs. A consultation on their proposals, 'Appeals, costs and standard daily amounts', will close on 4 November 2016.<sup>6</sup> The intention is to formally adopt this guidance for the award of costs.

52. An application for the award of costs will be made to and determined by the Planning Inspectorate, which will use the new planning guidance to assess the case.
53. An application for costs may be made irrespective of the procedure used for the review and by any party to a review. The Planning Inspectorate may also decide to award costs in the absence of an application.
54. Any party to a review may be liable for costs if the Planning Inspectorate finds behaviour unreasonable. Costs can cover administrative costs incurred by the Planning Inspectorate, as well as costs associated with a hearing or inquiry that does not take place.

<b>Q6.</b>	<b>Do you agree with the measures proposed for the award of costs to deter unreasonable behaviour in designation reviews? If not, how could they be improved?</b>
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## B. Draft statutory guidance for certain public bodies — *Historic Environment Records in Wales: Compilation and Use* — as required by the Historic Environment (Wales) Act 2016

55. The 2016 Act requires the Welsh Ministers to compile and keep up to date a publicly accessible historic environment record for each local authority area in Wales. A historic environment record provides detailed information about the historic environment for public benefit and use.
56. The Welsh Ministers have asked the four Welsh archaeological trusts to discharge this duty on their behalf, and preparatory work is underway to bring the provisions into force in 2017.
57. Each archaeological trust maintains a regional historic environment record and together they provide comprehensive coverage of the whole of Wales. These records are the product of decades of research and investigation and are maintained and updated in accordance with national and international standards.
58. The 2016 Act also requires the Welsh Ministers to issue statutory guidance for certain public bodies in Wales — local and National Park authorities and Natural Resources Wales — on how they may contribute to the compilation of the historic environment records and how they should use the records in the exercise of their functions.

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<sup>6</sup> <https://consultations.gov.wales/consultations/appeals-costs-and-standard-daily-amounts>

59. This guidance, *Historic Environment Records in Wales: Compilation and Use* (Annex 1), explains:
- what historic environment records are;
  - the roles and responsibilities of key organisations;
  - the role of the public bodies in the compilation of the records; and
  - how the public bodies should use the records in the exercise of their functions.
60. This statutory guidance does not include information on the benchmarks and standards that the Welsh Ministers expect the trusts to adhere to in discharging their duties under the 2016 Act. This will be made available in a separate document in due course.

<b>Q7.</b>	<b>Does the draft statutory guidance, <i>Historic Environment Records in Wales: Compilation and Use</i>, clearly set out the roles and responsibilities of the relevant public bodies? How could this section be improved?</b>
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<b>Q8.</b>	<b>Does the draft statutory guidance, <i>Historic Environment Records in Wales: Compilation and Use</i>, give the relevant public bodies adequate guidance on how they may contribute to the compilation of historic environment records? How could this section be improved?</b>
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<b>Q9.</b>	<b>Does the draft statutory guidance, <i>Historic Environment Records in Wales: Compilation and Use</i>, clearly set out how the relevant public bodies should use the historic environment records in the exercise of their functions? How could this section be improved?</b>
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### C. Draft best-practice guidance: *Managing Listed Buildings at Risk in Wales*

61. *Managing Listed Buildings at Risk in Wales* (Annex 2) is best-practice guidance, which supports *Planning Policy Wales* — Chapter 6: The Historic Environment and *Technical Advice Note 24: The Historic Environment*.
62. It outlines the critical relationship between a building’s condition, use and ownership, and how the careful balance between these elements can be managed to ensure a sustainable future.
63. The guidance describes the roles and responsibilities of owners, the Welsh Government and local authorities. It shows how policies and programmes to manage listed buildings at risk can be successful, but also explains the statutory powers available to protect listed buildings at risk should they be needed.
64. Although the guidance focuses on listed buildings at risk, the principles can be applied to managing any historic buildings at risk, such as those

identified as locally important. Some of the statutory powers apply only to listed buildings.

65. *Managing Listed Buildings at Risk in Wales* is aimed primarily at local authority conservation, planning, housing, regeneration and development departments, as well as Welsh Government departments. It may be of interest to owners, occupiers and agents, as well as local communities and third sector organisations that have a vital role in caring for listed buildings at risk.

<b>Q10.</b>	<b>Will the draft guidance, <i>Managing Listed Buildings at Risk in Wales</i>, support the more effective management of historic buildings at risk? How could it be improved?</b>
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<b>Q11.</b>	<b>Does the advice on condition, use and ownership contained in the draft guidance, <i>Managing Listed Buildings at Risk in Wales</i>, cover the key issues? If not, what is missing?</b>
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## D. Draft best-practice guidance: *Managing Change to Registered Historic Parks and Gardens in Wales*

66. The 2016 Act requires the Welsh Ministers to compile and maintain a register of historic parks and gardens in Wales. This will replace an existing non-statutory register and create a comprehensive record of sites that meet the criteria of historic interest. A review of the entries on the non-statutory register is now being undertaken with the aim of bringing the provisions of the 2016 Act into force in 2017.
67. The draft best-practice guidance, *Managing Change to Registered Historic Parks and Gardens in Wales* (Annex 3), sets out general principles to follow when considering changes that may have an impact on registered historic parks and gardens. It explains the status of the statutory register of historic parks and gardens in Wales and its place in the planning system, including the roles and responsibilities of owners, local planning authorities, amenity societies and the Welsh Government's Historic Environment Service (Cadw).
68. This guidance is aimed principally at owners of registered historic parks and gardens, and agents acting on their behalf. It will help them to understand the implications of owning a registered historic park or garden and manage changes that affect it. *Managing Change to Registered Historic Parks and Gardens in Wales* can also be used by owners and managers as a best-practice guide to caring for registered sites. The principles and practices are applicable to all historic parks and gardens in Wales, whether registered or not.
69. *Managing Change to Registered Historic Parks and Gardens in Wales* supports *Planning Policy Wales* — Chapter 6: The Historic Environment and *Technical Advice Note 24: The Historic Environment*.

<b>Q12.</b>	<b>Does the draft guidance, <i>Managing Change to Registered Historic Parks and Gardens in Wales</i>, clearly explain the implications of owning a historic park or garden included in the statutory register? How could it be improved?</b>
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<b>Q13.</b>	<b>Will <i>Managing Change to Registered Historic Parks and Gardens in Wales</i> help owners and their agents to manage historic parks and gardens to achieve high-quality, sensitive change? How could it be improved?</b>
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## E. Draft best-practice guidance: *Managing Historic Character in Wales*

70. *Managing Historic Character in Wales* (Annex 4) is best-practice guidance, which supports *Planning Policy Wales* — Chapter 6: The Historic Environment and *Technical Advice Note 24: The Historic Environment*. It also highlights how an understanding of historic character can be used in many ways beyond the planning system.
71. The guidance explains why it is important to recognise historic character and use it as an evidence base for conservation, regeneration and planning work. It shows how policies and programmes to manage change can take inspiration from the past to help create and sustain distinctive places for the future.
72. *Managing Historic Character in Wales* does not impose another layer of designation or consent, but encourages the best use of our historic environment to improve the social, economic, environmental and cultural well-being of Wales. This means managing change sustainably, not preventing it.
73. *Managing Historic Character in Wales* is aimed primarily at local authority conservation, planning, housing, regeneration and development departments, as well as Welsh Government departments. It will also be of interest to local communities and third sector organisations that have a vital role in identifying, promoting and caring for local historic character.

<b>Q14.</b>	<b>Does the draft guidance, <i>Managing Historic Character in Wales</i>, clearly explain what historic character is? How could it be improved?</b>
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<b>Q15.</b>	<b>Does the draft guidance, <i>Managing Historic Character in Wales</i>, give sufficient information to support the effective management of historic character? If not, what is missing?</b>
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