

Committee Clerk
Communities, Equality and Local Government Committee
National Assembly for Wales
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Dear Sirs

INQUIRY INTO THE WELSH GOVERNMENT'S HISTORIC ENVIRONMENT POLICY

1. ICOMOS-UK, the International Council on Monuments and Sites, UK, through its parent body, ICOMOS, has a key role in the implementation of the UNESCO World Heritage Convention, 1972. The UNESCO World Heritage Committee is advised on nominations and the conservation of existing World Heritage properties by ICOMOS on cultural sites (and by the International Union for the Conservation of Nature (IUCN) on natural sites). ICOMOS-UK is pleased to provide this response to the Welsh Government's consultation on its historic environment policy. The response concentrates upon policy regarding world heritage in Wales.

2. Consultation Questions:

- The current systems employed by Welsh Government for protecting and managing the historic environment in Wales have served the built heritage and archaeology of Wales quite well. The statutory system of scheduling, listing, designation and non-statutory registration has become more complex through the years and it is probably timely that the systems should be re-examined and simplified, as promised in the previous heritage protection review for England and Wales. The lack of statutory measures for the protection of World Heritage Sites in the UK over and above the established systems is a weakness. World Heritage Sites, though mentioned in Planning Policy guidance for Wales enjoy no statutory protection.
- Welsh Government's policies for the promotion of the historic environment in Wales appear to have led to successful outcomes with much improved interpretation and accessibility in recent years. The promotion of World Heritage Sites in Wales (there are three such sites, with another candidate site on the Tentative List) could benefit with strengthening and greater liaison with one another.
- Welsh Government's wider policy objectives are in many instances, very relevant to their policies for the historic environment. Regeneration, planning and development are particularly pertinent to World Heritage Sites. Recent initiatives by the Welsh Government to promote regeneration in Blaenavon and at Pontcysyllte are especially noteworthy. Any new planning policies considered in the future must take into account any potential impact upon the historic environment in general and World Heritage Sites in particular.

- It is very important that in any merger with Cadw the important roles and long-term expertise of the Royal Commission are safeguarded within any merged body, whether it is within government or at arms length to parallel English Heritage. The National Monuments Record of Wales (part of the Royal Commission) is a charity and the Royal Commission has used its independent status to achieve considerable and growing outside funding, much of which would not be available if it was inside government. The option of extending charitable status and it continuing as an independent body should be considered as a viable option that may deliver best value and continued expertise for the Heritage of Wales (this is one of the three options being considered by the joint working party on the proposed merger). The Welsh Government has just set up an independent Commissioner for the Welsh Language in Wales. A re-formed Commission for Ancient Monuments pursuing its specialist role as an information organisation with charitable status may be the best vehicle to continue the innovative work in online and innovative digital animations and publications that have done so much to help Wales's achievements in World Heritage Status over the past decade and continue to do so.
- Local authorities and third sector organisations play a significant part in implementing Welsh Government's historic environment policies. From the perspective of the World Heritage Sites in Wales, the local authority planning officers play a fundamental role in pursuing effective development control within Sites and their Buffer Zones, while private owners and public bodies such as British Waterways are of vital importance in effective management of the Sites. Welsh Government support for local authorities and third sector organisations with Planning Guidance and grant aid for management, as well as regulation within designated sites, is invaluable in helping these organisations carry out their role.

Yours sincerely

Susan Denyer
Secretary, ICOMOS-UK