



# Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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Mr Marc Wyn Jones  
Committee Clerk - Policy  
Communities, Equality & Local Government Committee  
Cardiff Bay  
National Assembly for Wales  
CARDIFF  
CF99 1NA

29 June 2012

Dear Mr Jones

## **CONSULTATION: INQUIRY INTO THE WELSH GOVERNMENT'S HISTORIC ENVIRONMENT POLICY**

Thank you for giving the Countryside Council for Wales (CCW) the opportunity to comment on the Welsh Government's Historic Environment Policy Inquiry run by the Assembly's Communities, Equality & Local Government Committee. CCW is the Government's statutory advisor on sustaining natural beauty, wildlife and outdoor enjoyment in Wales. We champion the environment and landscapes of Wales, and its coastal waters, as sources of natural and cultural riches, as a foundation for economic and social activity and as places for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

CCW welcomes this Inquiry on Historic Environment Policy and offers the following general comments, followed by specific comments following the order of questions as set out in the consultation.



**Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea**

## General Comments

There is an important overlap between natural and cultural heritage, and therefore the need for special and close working relationships between organisations focusing on natural resources and cultural heritage is imperative. An important part of CCW's remit is 'landscape' which is about the relationship between people and place. People hold many values related to our heritage that we have to factor into our understanding and evaluation of our landscapes, which have both natural and cultural influences. Wales is a highly adapted and altered cultural landscape that is a complex palimpsest of not only natural but also human processes over time. As a result whilst CCW is natural resources body, we have a strong interest in cultural heritage.

The historic environment has been recognised in both the UK National Ecosystem Assessment (NEA) and the Natural Environment Framework (NEF) as being an integral element of cultural services and includes historic assets, buildings, parks and landscapes. The long-standing inter-relationship between people and the environment, especially in Wales, has meant that cultural heritage has particular significance in any consideration of ecosystem services. Like all ecosystem services, cultural heritage is dependent on the underpinning supporting services which the environment provides. Therefore, protection and management of these fundamental services is essential for the continuation of cultural heritage. We would wish the Welsh Government's historic environment policy to incorporate this ethos and way of working for the future.

## Consultation Questions

### 1. **How appropriate and successful are the current systems employed by the Welsh Government for protecting and managing the historic environment in Wales?**

CCW's perspective is from an organisation that highly values the historic environment and regards the historic and cultural environment as an integral part of our work. We engage with both historic environment policy and practice at a variety of levels throughout the organisation.

We recognise that the combination of statutory and non statutory designations, registers, records and information resources facilitates the protection and management of the historic environment in Wales. We support this range in the current system that allows distinctions to be made between value, priority and recognition. This is particularly helpful in aiding understanding of the relative importance of historic environment assets in relation to planning, casework and priority.

In any system, guidance and advice sets out how that system should be deployed and interpreted. It would be helpful to have more clarity and guidance on the relative status and *weight* in the planning process that is afforded to non statutory assets, the Register of Landscapes of Historic Interest in Wales and the proposed Battlefields Register, for example, and the *extent* to which they would be taken as a material consideration. In protection and management it would be useful to have guidance on applying and understanding settings of historic assets for positive proactive management and for taking into consideration when determining the impact (and if it is of more than local impact) and significance of change proposals.

Emphasis on landscape scale historic character could be enhanced. Currently, it could be regarded as a system of some areas within Wales being recognised and valued at a landscape scale, for example the Register of Landscapes of Historic Interest and World Heritage Sites, and then isolated heritage assets which are scheduled, listed etc. In-between these two is the remaining fabric of Wales in which historic character is evident, to a lesser or greater extent everywhere. The historic environment (whether buildings, monuments, parks or landscapes), contributes significantly to a locally distinctive ‘sense of place’. These places, whether designated or not, are highly valued by both society and individuals. This is the part that can potentially slip in-between policy, protection and management and be the subject of fragmentation of historic character and features of interest. The attention to managing wider historic landscape character and making the connections and relationships between individual assets and the natural resources of an area is important, often the importance is greater when collective rather than individual.

Systems can be appropriate but not successful if insufficient resources and priority hinders their potential. Declining resources, capacity to undertake work, experienced staff in authorities and relevant organisations currently reduce the potential to achieve more.

Many organisations that need to take the historic environment into consideration for their work, understand that the intricacies and breadth of historic considerations could be clearer. The online system of the Historic Environment Records (HERs) of Wales, Archwilio, is an excellent resource and highlights HER features and their legal protection. What could enhance access to information and highlight factors to be taken into consideration would be to incorporate other information resources (Cadw, RCAHMW, WATs, CCW, etc) by sourcing all information in one place, or having a central starting point that would cover the interests that encompasses all information relating to the historic environment. This would improve the success of practitioners/consultants in ensuring all aspects of the historic environment are taken into account and included.

**2. How well do the Welsh Government’s policies promote the historic environment in Wales (for instance, in terms of interpretation, accessibility, attracting new audiences and tourism)?**

No comment.

**3. How well do the policies for the historic environment tie in with wider Welsh Government policy objectives (such as the regeneration of communities)?**

Policies to conserve our heritage whilst also being in the act of planning for the future are often not seen as compatible and, with imperatives for economic development, it is often heritage that loses out. Heritage assets, together with environmental capital, have the potential for a dramatic and positive effect on the quality and identity of the places we build and run our lives within. We need a radical shift in thinking towards recognition that heritage and environment can be significant contributors to regeneration and prosperity.

An unfortunate pattern is becoming very apparent in Wales in the built environment. It is that if the place is not protected because of its historic importance (such as a World Heritage Site, listed building, ancient monument or Conservation Area) or its landscape importance (such as AONB or National Park) the likelihood is that a poor quality of siting and design process is

sometimes more likely to get through the planning process. The result that we see far too frequently across Wales is isolated areas of careful thought about landscape and heritage issues, surrounded by an area subject to less rigorous control or consideration. The cumulative effect is a divergence of character from what was locally distinct and very strong, to sometimes rather chaotic and discordant collection of unrelated built elements and features and a very poor quality of public realm and greenspace.

Some of the very communities that require most regeneration are often those outside of traditionally designated (historic and landscape) areas where the effect has been most apparent, where natural and cultural heritage assets that could have assisted in transformation by providing continuity links between the past and the future, have been so neglected or lost over the years that their potential to assist in such regeneration is now severely compromised.

Further examples of the lack of effective use of heritage assets (and environmental capital) in regeneration and redevelopment is where large single land-use planning has taken place which tends to obscure much if not all of the scale, pattern and grain of landscape and townscape evolution over time.

A process that allows historic assets, landscapes and townscapes to continue to evolve, recognising historic and contemporary functions, should be set in a cultural and natural resource context that allows for sympathetic and appropriate change.

**4. What would be the advantages and disadvantages of merging the functions of the Royal Commission on the Ancient and Historical Monuments of Wales with the functions of other organisations, including Cadw?**

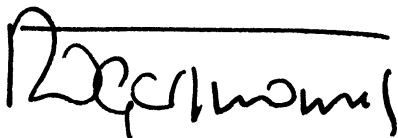
No comment.

**5. What role do local authorities and third sector organisations play in implementing the Welsh Government's historic environment policy and what support do they receive in this respect?**

Local authorities and third sector organisations have the potential to play a far more positive and effective role if sufficiently resourced in finance, capacity, experienced and creative staff and an underlying skills base for the heritage sector.

Thank you for consulting, we look forward to engaging further and to the outcome of the Heritage Bill.

Yours sincerely



**Roger Thomas**  
**Chief Executive**