

**Inquiry into the Welsh Government's Historic Environment Policy
Response from Institute of Historic Building Conservation**



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Committee Clerk
Communities, Equalities and Local
Government Committee
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Dear Sir/Madam

INQUIRY INTO THE WELSH GOVERNMENT'S HISTORIC ENVIRONMENT POLICY

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. Our response to the consultation questions is as follows:

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

The IHBC believes that the current systems for management of the historic environment in Wales are relatively effective by UK standards but to be fit for purpose in the long term need development, particularly as regards:

- embedding heritage policy in Government policy overall;
- structures and functions;
- the quality and availability of resources and information;
- resources and capacity, especially in Local Authorities (LAs).

We welcome the First Minister's commitment through the proposed Heritage Bill to tackle owners who leave our historic environment to decay and prevent the loss of this irreplaceable resource.

However there are current issues which would need to be addressed in any review of policy and approach. These are in summary:

- The statutory lists of listed buildings and Scheduled Ancient Monuments need development including the definition of curtilages, the improvement of descriptions and the rationalization of overlaps between the systems. These will take time to achieve but the issues might benefit from an early start to get away from the current difficulty under which the problem perpetually looks too great to be achieved.
- The system of listed building consents, operated by the LAs, works relatively well but is undermined to an extent by under-resourcing.
- This under-resourcing exists both at LAs (where significant numbers of heritage staff have been lost in recent years) and, we believe, at Cadw.
- The recent programme to create better processes for dealing with Wales's 3,000 or so "listed buildings at risk" needs to be developed and resourced.
- The refocusing of Cadw's efforts on its estate due to commitments placed on it by Ministers, which has possibly diverted limited resources away from supporting other owners and users of historic buildings.
- While we support the proposed review of heritage legislation, there is a clear need to retain a separate consent system if the importance of the historic environment to society is to be recognised and properly managed for the benefit for future generations. It allows appropriate skills and expertise to be deployed in advising and ensuring appropriate weight is given by decision makers and forms the bedrock of the current system.

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)?

The IHBC believes that the examples given in the question might tend to divert attention from the real issues which are as follows; and we say more about them in answers to subsequent questions.

- **The need to better understand the extent and significance of the historic environment.** There is a need for improvements to the designation systems to better set out what significance heritage assets possess and (in the case of listed buildings) to define their topographical extent, and thus express the totality of their significance and not just that of the headline listing. Significance needs principally to be assessed by suitably qualified people but the input of communities is increasingly important and invaluable.
- **The need to establish a strong presumption of conservation of heritage assets through use.** The majority of heritage assets will not have an economic or social future, or, indeed, a future at all, if they are not employed in a use that serves the 21st century economy or its communities. The vast majority of heritage assets are not individually iconic or attractive to tourism or wider popular historic interest. They will only have a future if Government policy promotes their conservation as part of the development of the economy and social structures as a whole.
- **The need to recognize that the retention of existing buildings is resource-efficient and that heritage conservation should be a major component of climate change mitigation.** The embodied energy of existing buildings is considerable but wasted if they are inadequately or improperly maintained or redeveloped. Most heritage assets can be satisfactorily adapted to modern use without losing significance. This needs to be a major component of regeneration policy. It is a particularly important point for Wales as Wales has the highest proportion of pre-1919 buildings of the home nations.

- **The need to promote good heritage practice and train professionals and, crucially, craft tradesmen in appropriate techniques.** Heritage assets can easily be damaged by inappropriate intervention. This can be by inappropriate design, the use of inappropriate materials or be work carried out with inappropriate craft techniques. Most of the principles of traditional construction and use of materials are relatively simple and usually no more expensive than modern techniques particularly if account is taken of the cost of remedial work when inappropriate works fail. They merely need to be properly cascaded to the building industry and its workforce.
- **And, finally, the need for better public access to information, interpretation and to sites and their development for the benefit of the community and economy through tourism and other interest.** There is already very considerable interest in heritage in Wales and this is well supported by Cadw and RCAHMW. By adopting the embedded approach we advocate, the IHBC believes that this potential will be all the better engaged as good practice is carried out locally.

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

The post-election Ministerial portfolio changes have appropriately placed Cadw within Huw Lewis's remit of Housing, Regeneration and Heritage. This is to be welcomed but it is unclear if there are sufficient resources for Cadw to take advantage of this position within the Welsh Government.

Many policy areas need development with better integration of historic environment concerns into mainstream policy. This is not about saying 'no change' but about securing appropriate solutions for unique places and buildings, which, through inappropriate change, can lose their contribution to the street scene or wider area. Standard industry solutions to regeneration and climate change issues, while fine for a modern new-build proposal can be inappropriate for historic buildings for both aesthetic and technical reasons and can in some circumstances lead to a diminished historic environment, damage to occupants' health and damage to the structure of the building in the longer term. Examples are roof-mounted photo-voltaics, insulating treatments and upvc double glazing and similar alterations.

In order to ensure appropriate energy efficiency measures can be found, further research needs to be undertaken before tax payers money is poorly invested in such programmes as Arbed and the forthcoming 'Green Deal'. As seen in the recent BBC1 consumer programme X-Ray (25th June), a number of private sector operators can be unscrupulous in the application of measures for energy efficiency due to the incentives offered by Government, which are inappropriate for the host building leading to dampness and in some cases worse.

Another policy opportunity currently being lost is tackling Buildings at Risk and bringing the opportunity provided by unused historic buildings together with identifiable local housing needs. Little work has been undertaken to actively bring these two areas of work together. There is a clear opportunity for WG, Cadw, Local Authorities, Building Preservation Trusts and other 3rd sector bodies to hit two birds with one stone.

However, in practice local authorities are very adept in aligning historic environment needs with wider regeneration policy initiatives. This is evidenced through the very successful programme of Heritage Lottery Fund supported Townscape Heritage Initiatives (THI), an area-based heritage-led regeneration grant scheme tackling underused and dilapidated historic buildings in town centres which have operated in nearly every local authority area in Wales, including completed and active schemes in Denbigh, Rhyl, Colwyn Bay, Bridgend, Llandrindod Wells, Holyhead, Cardigan, Newport and Pembroke

Dock amongst many others. These schemes often bring together a diverse range of funding including ERDF, WG, HLF and local authority contributions for supporting local communities and businesses in creating confidence, civic pride, skills training and new opportunities for job creation and business start ups.

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?

We see the real risk in a merger of the Royal Commission and Cadw as its being seen as merely an institutional efficiency. The organisations have very differing objectives and these are not easily reconciled through a merger.

The IHBC sees the need for the delivery of 2 separate functions. The first is the management of the historic estate currently managed by Cadw. The other is the continuation of the development of understanding of the significance of Welsh heritage, its interpretation and promulgation, including the statutory roles and service provided to the LAs.

We think this might be more efficiently provided by a single body but the design of this should not just be an institutional merger but a proper examination of functions and the setting up of structures to deliver them effectively.

Resources might be further extended by collaboration. WG/Cadw could appoint regional boards to assist Cadw in the examination of problem properties and situations where local authorities would welcome a second opinion. There is a wealth of talent in the IHBC and the RICS Building Conservation Forum to assist in a process where there is a full appraisal for the future of any building.

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?

The IHBC believes that the roles of LAs and the third sector (and, indeed, the contributions of many well-informed people and companies) are essential and crucial to the success and the continuance of the protection and management of the historic environment of Wales. While the Welsh Government is seen to support local authorities and third sector organisations in principle with the delivery of its historic environment policy, the reality is little real strategic support can be found, leaving LAs, individuals and developers under-resourced at the point of delivery.

The lack of historic environment policy embedded in all aspects of Government policy means that the good work being done by Cadw and the Conservation Trusts is undermined by LA programmes that are based in narrowly framed general Government policy which does not adequately reflect historic environment issues and policy.

The 3rd sector for the historic environment is relatively weak in Wales. In England, a representative body the 'Heritage Alliance', established in 2002, and brings together 92 member bodies, ranging from the National Trust, the Institute of Historic Building Conservation to the Chapels Society, which represent over 5 million individual members and another 450,000 volunteers. It is chaired by Loyd Grossman. Its role is to be an authoritative, respected and influential advocate for the non-government heritage sector; share knowledge and experience across the sector; be the catalyst for collaborative working in the sector and beyond; and connect heritage with the big issues in 21st Century society. It provides a forum for members to formulate and promote policy on core issues, a support and information network and participates in all the major sectoral fora. A similar body exists in Scotland - The Built Environment Forum Scotland (BEFS).

A valiant attempt led by the Civic Trust for Wales to establish a similar body in Wales failed as a result of limited support from Cadw.

In recent years a vibrant group of community-led Building Preservation Trusts, set up to tackle buildings at risk, have dwindled to a handful of active Trusts, for a mixture of reasons including a lack of support from Government in not recognising or appreciating their role, to local authorities unwilling to use their powers and changes in the availability of capital loans possibly caused by the supposed risk associated with complex historic building projects. Successful trusts such as the Cadwgan Building Preservation Trust and Carmarthenshire Heritage Regeneration Trust are amongst the most active and are often supported in their work by the Prince's Regeneration Trust.

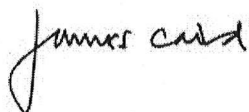
Conclusion

Wales has an enormous resource of historic assets and in many ways is well-placed to develop this resource into a world-beating heritage management system. The trick will be to embed heritage policy in all aspects of Government policy for the benefit of the economy and community rather than treating the historic environment as an add-on which needs to be supported as far as can be afforded.

Yours faithfully

On behalf of

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