

Communities, Equality and Local Government Committee

Inquiry into the Welsh Government's Historic Environment Policy

Response from Ymddiriedolaeth Addoldai Cymru / Welsh Religious Buildings Trust

Thank you for the opportunity to submit our views on this subject.

Ymddiriedolaeth Addoldai Cymru Welsh Religious Buildings Trust (WRBT) was established as an independent charity by Cadw to take into care redundant non-Anglican religious buildings that are exceptional examples of Wales' religious built heritage. The Trust also endeavours to provide advice and assistance to those responsible for caring for the religious built heritage in Wales, as its resources allow. The WRBT currently owns six redundant nonconformist chapels and is in the process of acquiring another. The Trust receives limited core funding for day-to-day running costs and basic overheads for its buildings from the Welsh Government via Cadw; other income is from grants and donations. All the Trust's buildings are either awaiting repair or are in the process of being repaired in phased programmes, and once repaired will be made available for community use and public access. The Trust's main office is in the schoolroom of Capel Peniel, a grade I listed chapel in Tremadog. The Trust currently has a staff complement of 1.6 (full time equivalent).

In May 1993, the Welsh Affairs Committee of the House of Commons in its report *The Preservation of Historic Buildings and Ancient Monuments* recommended, inter alia, the setting up of a Redundant Churches and Chapels Fund for Wales. Cadw subsequently established a working party specifically to review the issue of redundancy amongst Wales' rich heritage of nonconformist religious buildings. The working party reported in 1996, and recommended the setting up of a new charitable trust to acquire and care for redundant non-Anglican religious buildings of significance for the benefit of future generations, and to act as an advisory body and information source. Cadw subsequently invited the Wales Council for Voluntary Action to manage the creation of the WRBT, which was incorporated in November 1999.

In respect of caring for redundant Anglican churches in Wales, the Representative Body of the Church in Wales has established an arrangement with the Friends of Friendless Churches, which is based in London. Similar bodies caring for redundant religious buildings in the United Kingdom are the Churches Conservation Trust, dealing with redundant Anglican churches in England; the Historic Chapels Trust, which deals with redundant non-Anglican buildings in England; and the Scottish Redundant Churches Trust.

Consultation Questions:

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

- The current legislative and guidance framework for the historic environment, a hybrid of Westminster legislation and Cadw guidance, has evolved over decades and is now under review. The subject matter is complex and the mechanisms are understood by professionals working in the historic environment field, although perhaps less so by the

general public. There is scope for streamlining. However, whilst there may be some merit in making any new framework more easily understood by the general public, the Trust would be concerned at any dilution of existing processes and guidance; rather, the existing framework should be strengthened.

- The Trust believes that Cadw could be more outward facing in terms of its message and purpose, so that the systems employed by the Welsh Government for protecting and managing the historic environment are seen as relevant, and are being undertaken by and on behalf of the people of Wales and its communities, rather than the danger of being perceived as being imposed upon them.
- Cadw could provide more advice and guidance and undertake a more proactive educative and standard setting role. Cadw could usefully build on the foundation of its accessible and informative website Maintenance Matters! to disseminate advice, guidance and advocacy more widely, so that the 'person in the street' has a better understanding of the issues.
- Cadw's general website now seems to carry less information on policy issues, technical guidance, and information in general than previously. It may be that Cadw wants a site that is more welcoming to the general visitor, and if so, it should create a parallel sector/technical site, similar to Historic Scotland's new Technical Conservation website to provide more technical and policy advice.
- Although the WRBT was established at the behest of Cadw, there is a lack of resources being provided to the Trust to undertake the work that Cadw expects of it. This places a great strain on Trustees, who have taken personal responsibility for redundant buildings in a poor state of repair, but which are, however, a vital part of our national heritage.
- Grant budgets do not seem to be set until well into the financial year, which has obvious repercussions. The WRBT do not know at what level within the Welsh Government this delay occurs. Our direct experience of Cadw staff has been excellent, and we greatly value their assistance and positive outlook. It appears to us that Cadw may well be under-resourced for what the Welsh Government as a whole requires of it.

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 Welsh Government needs to be more proactive in promoting the built heritage of Wales in general. This needs long-term policy objectives and funding commitment, and should not be led by short term objectives. We are accountable for the stewardship of our heritage whilst it is in our generation's care.
- Cadw aspires to be the champion of the historic environment in Wales. It does promote its own projects very well, and is making good use of its own property in care. However, the Trust believes that Cadw should be much more greatly concerned with the sector as a whole. The RCAHMMW seems to be undertaking focussed work on the historic environment in Wales in general. For example, it fell to the RCAHMMW rather than Cadw to undertake research to produce the first clear knowledge database of the extent of Wales' nonconformist built heritage.
- Cadw may well even appear to be open to the perception of a conflict of interest, in that although it presumably has a remit to promote the whole sector and all historic buildings in Wales, the current emphasis does seem to be on Cadw's own estate. Consideration should be given to separating the policy, regulatory, advisory and awareness-raising functions of Cadw from its role as an operator of important heritage sites, which are also highly successful visitor attractions.
- We know of the Heritage Minister's Historic Environment Group, and it seems to have an interesting and useful work programme. However, the Trust cannot be alone in not seeing

the fruit of this work, either in the form of reports or minutes. We would urge that its work be more widely disseminated. We wonder whether the Group should be more formally constituted, with an oversight role (of Cadw's overall long-term strategic direction and vision) as well as an advisory remit to the Minister.

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

- Although the principle of regeneration through heritage has been introduced, there is still the perception that our heritage is an add-on, a luxury that can be attended to after all the more 'important' issues have been dealt with. It is not integrated.
- Although some good work has been done on the value of heritage to the economy, (e.g. Valuing the Welsh Historic Environment 2010) these efforts appear sporadic rather than systemic.
- We wonder if there is the necessary policy capacity within Cadw to be working across Government on integrating issues dealing with the historic environment into cross cutting policy areas.

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

- We understand that the abolition of the RCAHMW is being considered, in order to deal with budgetary issues over the next two, three or four extremely difficult years. This seems to us to be an extremely short-term measure with possible extremely long-term consequences. We cannot see the advantage of simply merging the functions of the RCAHMW with the functions of Cadw without a proper and thorough review of the whole sector.
- We note that the Minister has established a working group to create a process whereby the core functions of the RCAHMW could be merged with other organisations, including Cadw. We cannot understand why this review has been initiated at the same time as the commencement of the consultation process that will lead to the Heritage White Paper and subsequent Heritage Bill. We do not know if the working group will be producing a report and, if so, whether it will be published and any recommendations subject to public consultation.
- Two previous inquiries on the work of the RCAHMW have reported favourably, both on the quality of its work and value for money achieved: in April 2011 the *Welsh Historic Environment Assessment Exercise* noted that "this exercise has not highlighted the significant areas of duplication and overlap that might have been anticipated". (Section 12 p70) and previously in 2010 *The Report On The Citizen-Centred Governance Review Of The Royal Commission On The Ancient And Historical Monuments Of Wales* noted "that once the full extent of the outputs of the organisation became clear, and throughout the review we were continually impressed by the amount the organisation does on this budget." (Section 9.4 p31)
- It appears to us that those best placed to propose any changes initially would be the Commissioners themselves, a body possessing considerable subject, institutional and administrative expertise, with subsequent input and response from the Welsh Government, including a thorough consultation process.
- There is a general need for greater coherence and more joined-up strategic thinking across the heritage sector in Wales, accompanied by the provision of guaranteed long-term resources from the Welsh Government. For example, there may be advantages in bringing together the functions of the RCAHMW, the four Archaeological Trusts and some parts of

Cadw as a new arm's length Welsh Government sponsored body, on the lines of Amgueddfa Cymru National Museum Wales or Llyfrgell Genedlaethol Cymru National Library of Wales. These issues should be considered in the context of the consultation process associated with the forthcoming Heritage White Paper and subsequent Bill, and should be subject to thorough public scrutiny and consultation.

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 are the layer between Welsh Government and communities across Wales. We have the impression of a wide variation in standards and resourcing from authority to authority. Often there is a lack of capacity to do much more than meet minimal statutory requirements, and where there is a lack of expertise, it results in a lack of confidence and imagination. Unfortunately, it seems that 'heritage' is seen by many local authorities as an add-on, a luxury if there is enough money left, rather than a core issue of identity and well-being.
- The Built Heritage Forum of local authority conservation officers is in our view an asset, taking advantage of the opportunity to have all in Wales in one room. This should be built upon, to create tight cohesive networks, and be provided with adequate resources.
- Consideration should be given to sharing expertise across authority borders e.g. building conservation expertise.
- Many historic assets are owned and managed by third sector bodies – from small local charities, through the religious denominations to the National Trust. However, it is a fragmented field. Some work was undertaken in 2008/9, initially with the support of Cadw, on creating an historic environment network for Wales, with a role roughly similar to the Heritage Alliance in England or nearer to home, Wales Environment Link. A working party comprising representatives of the National Trust, Civic Trust for Wales, and Institute of Historic Building Conservation amongst others made a firm proposal to Cadw towards setting up such a network but Cadw decided not to support it. We are not aware of any further progress. Such a network would assist the work of your committee – it was only by chance that this Trust became aware of your consultation. An historic environment network would at the very least provide a clearing house for contacts, communication and consultation.
- The Welsh Government should play a more proactive role in relation to the third sector. For example, many examples of our remarkable religious built heritage are at risk, or soon will be, and the situation requires a systematic appraisal, with strategic recommendations, bringing together the religious denominations, local authorities, and other interested parties. Such work was undertaken by the now abolished Historic Environment Advisory Council for Scotland, who published in 2009 a *Report with recommendations on the long-term conservation of the ecclesiastical heritage in a time of demographic change*. Cadw was briefly engaged in discussions with the various nonconformist denominations together with this Trust during 2008/9, but these failed to make progress.
- As a third sector organisation set up by Cadw we feel that we do not receive sufficient resources in order to undertake the immense amount of work required to try to secure an active and useful life for the buildings that we are acquiring. There is a shortfall both in capital and revenue funding. Trustees believe that Wales' nonconformist built heritage is at least as important to Wales' national identity as the Edwardian castles, and yet in comparison it receives limited resources. Many of these buildings are now at risk, and we should not be seen by future generations as being the generation that let their heritage slip through our fingers.

- We note that the committee has not asked for a response on the role on private owners of heritage assets, and how they interact with Government policy.