

INQUIRY INTO THE WELSH GOVERNMENT'S HISTORIC ENVIRONMENT POLICY

The Prince's Regeneration Trust welcomes the opportunity to respond to this consultation. This response has been written by Edward Holland, Senior Projects Adviser, based in Wales, on behalf of the Trust and represent his personal, professional views on the consultation questions.

The Prince's Regeneration Trust is one of HRH The Prince of Wales's group of charities. We work throughout the UK, focusing on areas of social and economic deprivation, to ensure that historically important buildings at risk of demolition or decay are conserved, regenerated and reused. Our projects demonstrate the enormous benefits of heritage-led regeneration, including the creation and safeguarding of jobs, the attraction of inward investment to deprived areas, strengthening communities and place-shaping. We also have a strong interest in capacity building and developing skills across the heritage sector. The Prince's Regeneration Trust has one member of staff based in Wales and we have close links with Cadw and other heritage bodies within Wales.

In answer to the specific questions:

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

The systems employed by the Welsh Government stem from those required by legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979 . Welsh Government publishes secondary guidance associated with these pieces of primary legislation. Central government selects most of what in the historic environment is judged to be of special interest or national importance. These are known as listed buildings, scheduled monuments, registered parks and gardens or historic landscapes. Local government selects local areas (Conservation Areas) that are also judged to be of special interest. World Heritage sites are selected by an international committee but Welsh Government employs systems for their subsequent protection as set out in planning guidance (eg PPW).

This system works well in that it ensures the significance of the historic environment is largely determined on a national level where that overview can lead to a consistent application of statutory controls. Conservation Areas are different as they are focused on local character and it is right that local authorities should decide on their designation though equally right that central government imposes a duty on them to designate and protect appropriate areas.

The number of listed buildings and ancient monuments appears to be about right but there should always be the capacity to add more and to review existing designations as knowledge continually develops and as time moves on places can acquire an historic significance that they might not have been judged to have had at the time of first assessment. Changes to registered historic gardens should require consent as well – at the moment they are only a planning consideration.

In terms of how successful the systems are, there is some variance in their delivery around Wales due to the experience and seniority of the staff advising on historic environment issues. Whereas in England all authorities have delegation on determining applications on Grade II listed buildings, in Wales, relatively few authorities have been granted delegation. For the future it seems that either Cadw needs additional resources to be able to input into such a large number of Listed Building Consent cases referred to them or Welsh Government needs to enable local authorities to be more strongly resourced with conservation professionals so that delegation can be rolled out to more authorities in Wales. There are ever increasing demands for alteration to the historic environment, renewable energy being just one, that decisions can be complex and require time. The public increasingly demand faster decisions and more transparency about the process which means there is a need to review the implementation of what is a good system but one that is sometimes undermined by lengthy procedures or under-resourcing.

Conservation Area control is especially variable and some areas have been noticeably degraded through the weakness of the legislation and legal precedent. More Article 4 directions served would help but there is a resource implication there for already overstretched planning services.

One aspect of the historic environment that any review could assist with is greater clarification of curtilage. However this should not attempt to define the curtilage of each building but merely to give clearer guidance on how it should be determined. The French system is potentially a model where there is effectively an exclusion zone around each 'listed' building affording protection to the setting of that building through particular attention being paid to the character of its neighbours.

The potential overlap between listed building and scheduled monument protection is perceived by some as a problem but we are aware that Cadw has pragmatically managed this in many instances.

The lack of grant aid undermines the public perception of the value of historic environment controls such that it is seen as all stick and no carrot. Systems that are focused more at helping owners look after their part of the historic environment, rather than simply controlling how they do this, would be advantageous.

This especially relates to Buildings at Risk. It is good that Cadw has funded the preparation of Registers but it now needs resources to specifically address these buildings as existing conservation staff are generally fully stretched dealing with casework. In England, in some local authorities Buildings at Risk Officers are financed by English Heritage.

The systems for taking statutory action are also too cumbersome. There is an urgent need for some central fund that can underwrite local authority action at an early stage. Too often action is left until the 11th hour by when there is a lot less of the significance of the building left to save and the necessary works are more costly and contentious. The very impressive action by Denbighshire County Council re Denbigh Hospital is extremely rare in Wales not through lack of will on behalf of Cadw or Local Authority Conservation staff but through the financial and legal risks it presents to local authorities.

In conclusion the systems will only be as good as the priority placed on implementing them and it is very easy for the historic environment to be irreversibly degraded if its management lets up even for a short while.

- 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)?*

Cadw has long been highly regarded for its interpretation and has won many tourism awards over the years. This achievement of excellence should continue. It also promotes the historic environment through its good practice guides which are exemplary. However it is not clear to what extent the average stakeholder in the historic environment is aware of this guidance. A Monumentenwacht (Netherlands) type system for directly giving owners information and indeed face to face advice could address this and better disseminate advice and understanding.

We believe the value of the historic environment is not just to tourism but is equally for local people, giving them a sense of identity and creating opportunities for them for economic and social regeneration.

We think Welsh Government could do more to promote, in an accessible way, the value of the entire historic environment, not just the major set-piece monuments. In this way Welsh Government could complement the work of the Townscape Heritage Initiatives which have done so much to regenerate places such as Denbigh and Cardigan.

The value of heritage-led regeneration is now well understood and The Prince's Regeneration Trust would be happy to share with Welsh Government the work it has done on demonstrating the sustainability of the historic environment and of how the economic and social regeneration, that can derive from it, can repay the initial public investment.

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

Combining heritage with the Housing and Regeneration portfolio is an interesting change which we support as we firmly believe that heritage can stimulate regeneration and that this can often be achieved through creating housing, and in particular affordable housing. We hope this move enables heritage to be fully engaged with the development of regeneration initiatives. The Regeneration Investment Fund for Wales on the face of it would appear to be an excellent source of financial support for the historic environment but initial impressions are that it is focused more on a type and scale of project that does not lend itself so easily to specific support for the heritage. The Heads of the Valleys area has benefitted from a great deal of investment through Welsh Government but it is not clear whether maximum potential benefit has been derived by the historic environment. One of the projects in which The Prince's Regeneration Trust is involved, Crumlin Navigation Colliery, is much in need of substantial regeneration funding to address land reclamation issues that need to be tackled before traditional heritage funding can be used to repair and reuse the historic buildings. However the site lies outside the main regeneration areas and therefore lacks a clear source of funding.

A Welsh Government policy area that has a potentially damaging impact on the historic environment is that of climate change. Arbed has been introduced and we are aware of

concern amongst Conservation Officers that it is funding alterations to traditional buildings that are damaging and potentially creating long-term problems. It is crucial that an understanding of how traditional buildings perform is embedded in Welsh Government policies. The Prince's Regeneration Trust would be happy to share with Welsh Government the lessons learnt from the Working Group that we co-chaired with DECC on this subject. Overall we are not aware that the historic environment ties in with Welsh Government policies as well as it could or should.

- 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 function of other organisations including Cadw*

English Heritage and RCHME merged, in Scotland merger is being considered and in Northern Ireland all natural and historic environment responsibilities come within the one agency. However we recognise that the RCAHMW has a record of outstanding achievement especially in recent years where they have done so much to engage people in understanding and valuing their heritage and in recording significance. Our concern would be that if the RCAHMW ceased to be a distinct body and was absorbed into other Welsh Government organisations it could lose that focus and could become a reactive rather than the proactive organisation that it is.

There is also the risk that the ability of the RCAHMW to deliver its work would be compromised by it being perceived as just a part of a Welsh Government organisation rather than as a body with a degree of separation as it is at present.

There could perhaps be an argument to be made for the understanding, valuing role of Cadw to be merged with the RCAHMW leaving Cadw to focus entirely on its statutory functions and its care of its guardianship monuments.

- 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 have a key statutory role as discussed earlier. Cadw engages well re the historic environment at conservation officer level but not necessarily so extensively at Corporate Director level where the strategic and budgetary decisions are being made. Third Sector organisations put together projects to rescue and reuse specific buildings and are essential in the local management of the historic environment. The Prince's Regeneration Trust supports several Building Preservation Trusts in developing projects and securing funding and the futures of places such as Cardigan Castle wouldn't happen without the contribution of third sector organisations such as Cadwgan BPT. BPT's need greater support and Welsh Government could usefully allocate more resource to enabling some of these third sector bodies to obtain the professional support they need.

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