

# Communities, Equality and Local Government Committee

## Inquiry into the Welsh Government's Historic Environment Policy

### Response from the Welsh Historic Gardens Trust



Welsh Historic Gardens Trust

Ymddiriedolaeth Gerddi Hanesyddol Cymru

The Welsh Historic Gardens Trust (WHGT) was set up in 1989 in response to the very real threat to many historic parks and gardens in Wales. It is the only amenity organisation based in Wales specifically concerned with the protection and conservation of historic parks and gardens. Its main aims and objectives are to conserve, document and promote the historic parks, gardens and designed landscapes of Wales and to campaign for their protection. The Trust gained charitable status in 1994 and consists of a central body with county branches throughout Wales.

#### 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?

We strongly endorse the proposal, in the recent Government White Paper: *Heritage Protection for the 21<sup>st</sup> Century*, that there should be statutory protection for historic parks and gardens in Wales. Currently voluntary arrangements exist for consultation with Non-statutory Consultees on planning applications affecting parks and gardens and their settings on the Cadw/ ICOMOS *Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales*. The current planning regime was set up before the creation of the WHGT and, as a result, the principal advisory role on planning proposals that affected historic parks and gardens in Wales was given to the London-based Garden History Society (GHS). Local planning authorities are therefore asked to consult Cadw on planning applications impacting on Grade I and II\* sites and the Garden History Society on applications impacting on all parks and gardens on the register. This arrangement has had unintended consequences.

Ideally, all planning applications to Local Planning Authorities require weekly monitoring by Cadw and amenity bodies such as the GHS and Welsh Historic Gardens Trust as unfortunately not all LPAs actively seek consultation. The work of monitoring and responding to planning applications by WHGT branch conservation officers and the central co-ordinator is undertaken on a purely voluntary basis; there has been no government funding to date.

Cadw, the key party on historic environment matters, because of its unique and somewhat ambiguous role cannot object but only make comments on planning applications. There is a real danger that, even though Cadw may strongly advise against a proposal, a lack of formal objection

could be interpreted as support for the application.

The inclusion of Parks and Gardens on the Cadw/ICOMOS Register is at present voluntary, and at the discretion of the owners, and therefore there is the danger that important sites can be overlooked in the consultation process. We would like to see sites of registerable quality, not included in the register, being guaranteed equal protection under planning law. We would also recommend that the Registers be put on line as there is presently confusion as to the nature, significance and extent of listed sites due to the Registers' limited availability.

Also, a current Non-statutory consultee, the Garden History Society, has not had a planning caseworker responsible for Wales for several years and therefore no longer responds directly to planning applications affecting sites on the *Register*. Unfortunately lack of response by the GHS to consultations by LPAs sometimes has been interpreted as a lack of objection to a planning application. There is now an arrangement whereby the WHGT is indirectly informed of planning applications referred to the GHS; but here too delays ensue.

The WHGT is therefore effectively the acting Non-statutory Consultee for planning applications affecting listed historic parks and gardens in Wales. Indeed currently some LPAs, at their discretion and as a result of locally negotiated arrangements, are willing to consult us directly and appreciate our contributions. We would therefore strongly urge the National Assembly for Wales to formalise this arrangement and appoint the Welsh Historic Gardens Trust as the Statutory Consultee for planning applications concerning historic parks and gardens in Wales and that sufficient government funding should be forthcoming for this role.

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 and RCAHMW both produce excellent publications and the recent television series produced in collaboration with RCAHMW has been an effective catalyst in attracting new audiences. Some recent Cadw initiatives in interpretation have made sites more accessible to visitors but more use of new technology could be made. *Coflein* is an excellent on line resource which should continue to be expanded.

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

There is often a tension between policies; particularly economic development and protection of the historic environment. It rests with local planning authorities to balance the various issues raised by proposals and to make recommendations and decisions. In so doing, however, the benefits accruing from the restoration and use of historic landscapes for local and wider community should not be under-estimated. Public passion for, and interest in local history has rarely been greater. Restored landscapes and their buildings can create jobs, stimulate local tourism economy, and provide valuable opportunities for training and experience in conservation techniques.

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 little advantage in merging what are the separate and specialist functions of RCAHMW and Cadw, which need more resources to be able to do the job with which they are tasked.

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 make a critical contribution with little or no support. For example, WHGT consultation contributions to planning issues are solely from volunteers and rely on the expertise which happens to be within their membership ie there is no guarantee that such expertise would remain or be available. Funding should therefore be allocated to such third sector organisations to ensure continuity of contribution and the ability to respond more quickly and comprehensively if required. In respect of LAs, there is increased pressure to out-source expertise in conservation and landscape. This reduces the ability of the LA to react quickly and to have its own solid foundation of expert knowledge when dealing with internal decisions as well as responding to development control and local plan issues.

Implementation of the Welsh Government's policy on the protection of historic parks and gardens is not consistent across Wales. There are variations in the amount of consultation sought and in expertise within planning departments; not every LPA has a conservation or landscape officer. The WHGT has therefore instigated a series of regional planning seminars for local authority planners and representatives of heritage and amenity bodies as part of their role to raise the awareness of historic parks and gardens and designed landscapes and encourage discussion of the planning process. Government funding for similar enabling initiatives and Continuing Professional Development for delegates to attend such courses would be welcome.

Enforcement of planning approvals and conditions is also variable, with inconsistencies in policy between LPAs. The Trust feels strongly that any breaches of landscape conditions specifically designed to protect the historic landscape should be firmly dealt with by the LPAs. Not to do so is to devalue the time and effort of amenity groups and professionals who have worked together to achieve sensible and sensitive plans for historic sites. It moreover completely undermines the faith of the public in the collaboration of the LPA and amenity groups. Strong enforcement of landscape conditions are particularly important in historic parks and gardens and designed landscapes where mature trees and landscape features cannot be replaced once lost.

The Welsh Historic Gardens Trust also has a role in highlighting and responding to planning applications affecting gardens of local importance and vulnerable non-register sites not within the protected setting of a listed building, scheduled ancient monument or a conservation area. Several branches have compiled county inventories of parks, gardens and designed landscapes of historic importance. In some cases the Trust has been involved in campaigns to spot list sites at risk.

A unique contribution of the Trust has been its ability to respond promptly to planning applications with the benefit of in-depth research carried out by its members. Lack of maintenance, wilful or unwitting destruction of garden features and divided ownership can all pose a threat to historic gardens. The local vigilance of WHGT branch conservation officers is one of the few safeguards in identifying such threats. Encouragement of the understanding and appreciation of historic designed landscapes through amenity organisations such as the Welsh Historic Gardens Trust will do much to raise their profile within the wider community.

Yours sincerely,

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