

1. The Welsh Language Commissioner welcomes the opportunity to comment on the current consultation. The comments below relate primarily to the implementation of the Historic Environment Act and the protection of place-names as a result of the Royal Commission on the Ancient and Historical Monuments of Wales' list of historic place-names.

## Protecting historic place-names

2. The Welsh Language Commissioner is responsible for coordinating developments with regard to Welsh language place-names and I have emphasised the need to protect historic place-names in Wales on numerous occasions in previous consultations regarding the Historic Environment Act. Historic names, of course, have a direct link to the historic environment, and the names can reveal a great deal about the history of a specific place, the features of the landscape or the activity of people in that place. The names, as much as the features themselves, are part of our country's heritage, our culture and our national identity and can create a sense of place and belonging.

Indeed, placing a duty on Welsh Ministers to compile and maintain a list of historic place-names in Wales was an important first step in the right direction in terms of protecting historic names, but I believe that further, more detailed discussion is required about the way in which the list is used to protect the names on it in the absence of an act to protect them. As you know, I supported Dai Lloyd AM's Bill to protect historic place-names in principle, and even though that Bill was not developed further, initial discussions led to ideas and widespread support. We should certainly take advantage of the support and momentum in order to continue further discussions about practical ways of protecting place-names.

As noted in the statutory guidance, *Historic Environment Records in Wales: Compilation and Use*, and as reiterated by Ken Skates AM in the Assembly's plenary session on 15 March 2017, the Historic Environment (Wales) Act 2016 places statutory duties on local authorities to give due regard and consideration to the list when renaming or naming new streets or places. It is important to remember,

however, that it is only a duty to *consider* and that there is no duty to adhere to the historic names on the list. There are doubts as to whether asking a local authority to follow this policy is truly effective and achieves the desired results. The statutory guidance refers specifically to Ceredigion local authority as an example of an authority which follows such a policy; however, in light of a report on Ceredigion County Council's Street Naming and Numbering Policy, it appears that encouraging consideration of historic names does not necessarily result in keeping and protecting those names. The report notes three examples of historic Welsh names that have been replaced by English names despite the council writing to those wishing to change the names to encourage them to reconsider their decision. This is proof that further consideration is needed of the way in which the statutory list is used in practice.

I hope that these comments are of assistance to the Committee and its inquiry and that they will be a stimulus to restart discussions on protecting historic place-names.