

Communities, Equality and Local Government Committee

Inquiry into the Welsh Government's Historic Environment Policy

Response from Rob Scourfield

Thank you for the chance to comment on the above. I respond to your questions as follows:-

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

1. In terms of the legislation and guidance pertaining to listed buildings and Conservation Areas, we find that the existing guidance and legislation has stood the test of time well. The listed building descriptions - much better than those in England – are detailed and clear. There are weak spots however, as follows:-
 - a. Structures that are dually listed and scheduled. There should either be a re-think on the relevant designations, or a legislative mechanism whereby a LPA has an enforcement role. This involves buildings with a potential for reuse, such as Napoleonic Forts or domestic ruins.
 - b. The Register of Landscapes and Gardens should have full statutory status.
 - c. Clearer advice (e.g. in a policy annex) needs to be given to those applying for listed building consent, drawing together the 'bones' given in TAN 12 and the 'flesh' in the 2008 amendment of the GDO with regard to the preparation of Design and Access Statements.
 - d. The Conservation Principles need inclusion within any new guidance – and should be made clearer. If well-handled, this may highlight the wider appeal of the historic environment, as opposed to the 'architectural' and 'historic'.
 - e. The duty of care of owners of protected buildings/sites needs to be made clearer.
 - f. Wales has a very high stock of pre-1919 buildings with a tiny % being protected. Nothing is made of unprotected traditional buildings – the 'ordinary' which characterize the landscape of Wales – and represent a vast resource of embodied energy.
2. In terms of systems, it must be said that we have noticed a downturn in Cadw's capacity to perform basic functions, both due to staff cuts and the changing agenda of Cadw towards 'heritage tourism'. In the case of this Authority, I give the following examples:-
 - a. Listed building control 'delegation'. Award of this has been pending for over six months, despite Cadw's desire to promote delegation to LPAs across Wales.
 - b. Grants. Budgets for LPA townschemes/Conservation Area schemes are still not confirmed for this financial year.

The systems for delivering key functions such as funding and advice have served us well in the past, but systems fail without adequate staff. On a more positive note:-

- c. Cadw has recently been proactive in a number of key issues such as buildings at risk, and townscape characterization. This is welcomed.
- d. The biannual Built Heritage Forums held for Building Conservation Officers remains a popular and valuable exercise.
- e. Regionally-based officers e.g. the archaeologists – provide an excellent service

*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)?*

- 3. There is a strong perception that Cadw's closeness to the Welsh Government precludes it from championing the environment which it is charged to designate and regulate. In terms of Cadw-managed sites, the standard of interpretation and access provision is excellent – and Convergence funding will assist in bringing in new audiences. Outside of this, one struggles to see what Cadw has achieved in this respect. The RCAHMW has done far more to promote the built heritage of Wales through their publications, tv series (e.g. Hidden Histories) and their on-line database, Coflein. To a lesser extent, the regional Archaeological Trusts have had success e.g. in local projects and their on-line information. Whatever the WG's policies in promoting the historic environment may be, they have achieved little, and Cadw's approach is an inclusive one – centred on Cadw sites and ignoring the 'ordinary'

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

- 4. The perception is, very poorly. There are two extremes in terms of regeneration 'on the ground' – the run-down historic urban areas (where old houses are seen as a hindrance), and the over-provision of second homes (where old houses are beyond the reach of many locals). Both scenarios share the common problem of stagnation, and the problem needs tackling from both ends in terms of regeneration.

Environmental factors need better integration too. We are pleased to note the progress on the Welsh Building Regulations, and the growing recognition that our historic building stock is valuable in terms of embodied energy, and that the existing 'one size fits all' approach is detrimental. There are positive links between conserving energy and conserving buildings and this must be made more of. At present, the two are often seen as a conflict. Similarly, biodiversity issues need better integration.

*What would be the advantages and disadvantages of **merging the functions** of the RCAHMW with the functions of other organizations, including Cadw.*

- 5. Superficially, the integration of the information service with the delivery of policy objectives would seem a positive step. Outweighing this would be the danger that the unique information service would be submerged within a culture and legal remit that currently seems to preclude the overall promotion of the heritage of Wales. This would place the 100-year old database at risk, as well as the media outreach so well demonstrated by the RCAHMW. The database is unique and apparently not transferable e.g. to the NLW – it, as well as Coflein does not conform

to WG systems and practices – so, even to maintain the existing databases within a merger would hardly be cost-effective.

There is certainly a need for closer links between Cadw and the RCAHMW, but any merger should allow the latter to continue its existing functions without undue political interference. There is also a need to address areas of duplicity between the regional Archaeological Trusts and the RCAHMW – which currently causes much confusion in the planning system.

*What role do **local authorities and third sector organizations** play in implementing the Welsh Government's historic environmental policy and what support do they receive in this respect?*

6. LPAs are effectively the conduit between national (and wider) government policy, and the communities we serve through the implementation of local policies. LPAs receive some strategic support, but their 'heritage' capacity is typically minimal. As such, most LPAs can only concentrate on core statutory functions. Cadw has encouraged regional forums of heritage expertise within the public sector, but the mixed results are all to do with capacity. The biannual Built Heritage Forums organized by Cadw are a success, as is Cadw's buildings at risk initiative.

What is needed is an intermediary body that is collectively owned, developed from English (Heritage Alliance) and Scottish (Built Environment Forum) models. At present, the gulf between LPA officer (usually under-resourced) and the political agenda of Cadw is far too great.

I hope the above is of some use.

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