

Agenda Supplement – Culture, Welsh Language and Communications Committee

Meeting Venue:

Committee Room 2 – Senedd

Meeting date: 12 October 2017

Meeting time: 09.30

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– Consultation Pack: Historic Environment

Please note the documents below are in addition to those published in the main Agenda and Reports pack for this Meeting

2.1 Historic Environment Consultation Pack

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Hist Env_English

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Culture, Welsh Language and
Communications Committee

Historic Environment

Consultation Pack

October 2017



National Assembly for Wales

Culture, Welsh Language and Communications Committee

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* Saesneg yn unig

Cynnws | Contents

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Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and
Communications Committee
Amgylchedd Hanesyddol / Historic Environment
CWLC(5) HE01
Ymateb gan Ymddiriedolaeth Archaeolegol Dyfed / Evidence from Dyfed
Archaeological Trust

Dyfed Archaeological Trust is a non-profit making educational charity and a private limited company. Established in 1975, serving Carmarthenshire, Pembrokeshire and Ceredigion, the Trust is part of a network of four independent organisations, the Welsh Archaeological Trusts, covering the whole of Wales.

The Inquiry's Terms of Reference as published on the National Assembly for Wales website are high level and wide-ranging and at this stage of the process we do not consider it possible to provide detailed comments. However, we would be more than willing to provide evidence on specific questions or lines of enquiry to the Committee as the Inquiry progresses.

1. Summary

1.1 Welsh Government rightly recognises that the historic environment *'is a finite and non-renewable resource and a vital and integral part of the historical and cultural identity of Wales'* which contributes *'to economic vitality and culture, civic pride, local distinctiveness and the quality of Welsh life'*¹.

1.2 Against that background, the Historic Environment (Wales) Act 2016 is a welcome piece of legislation strengthening the mechanisms for the management and protection of historic assets in Wales. While there are other reforms which could further support and promote the historic environment, this provides a generally sound basis for its ongoing management.

1.3 However, heritage legislation does not operate in isolation. In particular, its operation is closely interlinked with the planning system and changes to the planning regime together with constrained resources threaten seriously to undermine the improved framework for management and protection of the historic environment.

2. Introduction

2.1 The Chartered Institute for Archaeologists (CIfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

2.2 CIfA has over 3,400 members and around 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

¹ Paragraph 6.2.1 of Planning Policy Wales, Edition 9, November 2016

2.3 ClfA's Wales / Cymru Group has over 300 members practising in the public, private and voluntary sector in Wales.

3. General

3.1 ClfA strongly supports the work of Cadw and of the Welsh Archaeological Trusts (all of which Trusts are members of ClfA's Registered Organisations scheme, a quality assurance scheme providing a 'kite mark' of commitment to professional standards and competence in the historic environment²). These bodies provide a sound organisational basis for the management and protection of historic assets with archaeological interest.

3.2 Furthermore, the Historic Environment (Wales) Act 2016 ('the Act') strengthens the mechanisms available to manage and protect the historic environment in Wales. We particularly welcome the introduction of a statutory duty on Welsh Ministers to compile and keep up to date a historic environment record for each local authority area in Wales but there are a number of other constructive reforms including

- an extended and more holistic definition of a 'scheduled monument'
- interim protection for assets proposed to be scheduled or listed
- modification of the defence of ignorance in respect of offences relating to scheduled monuments
- further enforcement provisions with respect to enforcement notices, stop notices and injunctions in relation to scheduled monuments.

4. Further Reforms

4.1 A significant issue which was not addressed in the Act is widespread damage to archaeological remains through ploughing³ and other agricultural activity permitted on scheduled monuments through the operation of class consents under the Ancient Monuments and Archaeological Areas Act 1979. Reform of the class consents regime should address this. There may be some compensation implications but it is not expected that these would be unduly onerous. Such

² <http://www.archaeologists.net/regulation/organisations>

³ See 'Saving Sites from the Plough' for consideration of a continuing UK-wide problem: http://www.archaeologists.net/sites/default/files/ifa_yearbook04_plough.pdf

expenditure would be a wholly justifiable price for the significant additional protection of historic assets that would be achieved.

4.2 The Act does not seek fundamentally to alter the pre-existing system of designation and protection of the historic environment. Given current threats to the historic environment (elaborated in section 5 below) a more radical re-appraisal of designation mechanisms may be necessary. This should include consideration of

- greater integration of mechanisms to protect the natural and the historic environment. For instance, historic marine protected areas (as introduced in Scotland by section 73 of the Marine (Scotland) Act 2011) would potentially provide a more flexible means than scheduling at sea constructively to manage marine heritage assets
- modification of existing designations (such as areas of archaeological importance under Part II of the 1979 Act and conservation areas) better to recognise and safeguard archaeological interest
- greater use of sites of archaeological interest (as defined in the Town and Country Planning (General Permitted Development) Order) in order to avoid harm to historic assets with archaeological interest through the exercise of permitted development rights.

4.3 In addition (and notwithstanding the recent publication of a revised Chapter 6 of Planning Policy Wales and a new TAN 24 on the Historic Environment), further policy changes which would facilitate the efficient management and protection of the historic environment include

- promoting the use of a more nuanced planning condition than that which appears as model condition 24 in Welsh Government Circular 016/2014: The Use of Planning Conditions for Development Management. The condition proposed by the Institute in its response⁴ to consultation on a draft of the Circular provides a more effective means not only to secure public benefit by offsetting harm to the significance of historic assets, but also to facilitate the prompt delivery of sustainable development

4
http://www.archaeologists.net/sites/default/files/IfA_response_to_consultation_on_the_use_of_planning_conditions_for_development_management.pdf

- development in planning policy of the concept of ‘archaeological interest’ as embracing historic assets which hold, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. This would help to make clear the need to consider not just known assets but also the archaeological potential of sites.

4.4 Consideration should also be given to how Welsh Government can maximise the delivery of public benefit from the historic environment⁵. This should include more effectively promoting the uniform application of professional standards⁶ in work relating to the historic environment along with recognition of the need for accredited practitioners in this regard⁷. ClfA would be happy to work with Welsh Government and other professional bodies to this end.

5. Threats

5.1 Scheduling under the 1979 Act is a discretionary process. Traditionally historic assets with archaeological interest have been managed by selective scheduling accompanied by flexible management through the planning system which allowed the impact of development upon undesignated assets to be considered and addressed. However, this model is currently under threat from ongoing planning reform combined with a chronic lack of resources in the wake of a crippling recession.

5.2 The emphasis in planning reform is on streamlining and deregulation which in many cases (for instance, the widespread extension of permitted development rights) removes the safeguards which the requirement for a planning application provides for the historic environment. Without an application there is no mechanism to require pre-determination archaeological desk-based assessment and field evaluation or to impose enforceable planning conditions to ensure the

⁵ In a planning context the Institute produced a report in 2011 on Realising the Benefits of Planning –Led Investigation in the Historic Environment: A Framework for Delivery (<http://www.archaeologists.net/sites/default/files/SouthportreportA4.pdf>). Although this report focused on England much of its content could be applied equally to Wales.

⁶ In archaeology these are formulated and enforced by ClfA: <http://www.archaeologists.net/codes/cifa>

⁷ In archaeology personal accreditation is provided through professional membership of ClfA (<http://www.archaeologists.net/regulation/accreditation>) and organisational accreditation is provided through ClfA’s Registered Organisations scheme (<http://www.archaeologists.net/regulation/organisations>).

delivery of public benefit. If we are not to risk losing historic assets (including assets of national importance) or harming their significance Government must ensure either

- that planning reforms contain adequate safeguards for the historic environment (something which has not thus far occurred, for instance, with the extension of permitted development rights) or
- that a new approach is adopted to designation so as to provide the protection formerly provided to undesignated assets through the planning system.

5.3 The risk to the historic environment is significantly increased in the light of the budgetary constraints to which local authorities and the Welsh Archaeological Trusts are subject. No matter how good the mechanisms for managing and protecting the historic environment are, if there are insufficient funds properly to administer the system it will fail.

5.4 Thus, for example, the provisions in the Act for Historic Environment Records (HERs) to be compiled, maintained and supported with appropriate expertise are the envy of the sector outside Wales, but without the commitment of funds on a long term basis to maintain and support those facilities they will be vulnerable. A HER is a dynamic tool which needs regular updating and expert support if it is to provide the benefits intended.

5.5 Similarly, the management and protection of historic assets through the planning system relies on appropriate archaeological and related expertise being available to local planning authorities in all cases. An IHBC staffing survey in 2012⁸ showed reductions in archaeological and other related posts in Wales and any downward trend must be halted and, if possible, reversed.

5.6 These concerns are also magnified by the United Kingdom's decision to withdraw from the European Union. Amongst the implications for the historic environment in Wales are

- the vulnerability of environmental regulation (particularly that relating to environmental impact assessment) in the absence of EU Directives

⁸ <http://www.ihbc.org.uk/news/docs/IHBC%20Quantifying%20staffing%20in%20Wales%202012.pdf>

- potential barriers to the free movement of skilled archaeological labour both into and out of the United Kingdom
- potential loss of funding and support for rural archaeology through withdrawal from the Common Agricultural Policy (CAP)
- potential loss of other European funding (for instance in education and research).

5.7 Brexit is a topic in itself, but these issues will have to be taken into account and addressed in any appraisal of the opportunities and threats facing the historic environment in Wales.

6. Conclusion

6.1 There is much to celebrate in the Welsh historic environment. However, if the threats facing the sector in Wales are not addressed, we may squander the opportunities provided by a forward-thinking and constructive Historic Environment Act.

- 1.0 Cytûn brings together the main Christian denominations of Wales and a number of other Christian organisations in Wales. A full membership list can be found at: www.cytun.cymru/us.html The member denominations have an adult membership of about 165,000 and meaningful contact with many more adults, children and young people in every community in Wales. The denominations hold in trust many thousands of buildings, mainly places of worship, including [3,000 historic places of worship](#) – about 10% of the total number of listed buildings in Wales. Churches also own some other listed properties (e.g. parsonages, cathedral closes, historic colleges, etc.) Many thousands more are included on local lists of historic assets of special local interest, or are considered important by their local communities.
- 1.1 Individual denominations have been encouraged to respond to the Committee’s survey of owners of historic buildings. It is important to note that places of worship are ‘owned’ by trust bodies, who hold them in trust for specified uses, usually the worship of God and the promotion of the Christian religion, sometimes limited to a particular understanding of that religion. Under charity law and the Acts of Parliament which govern many individual Christian denominations (such as the [Welsh Church Act 1914](#), the Calvinistic Methodist or Presbyterian Church of Wales Act 1933 as amended 1959, and several others), the trustees cannot use the resources held in trust for other than the relevant charitable purposes. The maintenance of the built heritage is not usually in itself one of those purposes, although it is often ancillary to the principal purposes. Some Christian traditions use a corporate trustee (a trust company) to hold the property; in others, local individuals are appointed as trustees for each building. In almost every case, day to day management of the property rests with local volunteers. This has significant implications for the management of these buildings, as the report *Supporting Places of Worship in Wales* (<http://www.nationalchurchestrust.org/news/future-wales%E2%80%99-churches-and-chapels>), published on 23 August 2017, illustrates.
- 1.2 The status of many church bodies as ‘excepted charities’ (covered by charity law but unable to register as charities) can make fundraising for building maintenance even more challenging, as many grant making trusts will fund

only registered charities, or require the insertion of specific provisions in a charity's constitution which for churches would run counter to the relevant Acts of Parliament. Cytûn has produced a briefing paper on this technical issue which can be made available on request, and is attempting to engage in dialogue with Welsh Government about the implications.

- 1.3 Cytûn, as an umbrella body for the denominations which own almost all of the 3,000 listed places of worship, takes the lead in co-ordinating the churches' engagement with Cadw regarding listed building legislation and policy. Individual denominations and congregations may also submit comments to this inquiry. We have not sought to comment on every aspect of the inquiry, only those of most relevance to historic places of worship and other ecclesiastical buildings.

2. Implementation of the Historic Environment Act

- 2.1 Cytûn and its member churches were fully part of the consultation process around the Act, and engaged extensively with Cadw and with the relevant Assembly committee during the passage of the legislation. We are grateful to Cadw, the Minister responsible and Assembly Members for their willingness to consider the particular issues surrounding historic ecclesiastical buildings during this process.
- 2.2 Engagement with Cadw has been enhanced by the establishing of the Historic Places of Worship in Wales Forum, which provides a regular meeting place for Christian denominations, Cadw, the Royal Commission on the Ancient & Historic Monuments of Wales, trusts, funding bodies and other stakeholders to meet, share news and discuss items of concern. This regular meeting place enables a fuller understanding of the constraints facing each part of the sector, as well as the opportunities afforded by Wales's remarkable heritage of ecclesiastical buildings. It has also played an important role in enabling those denominations who administer their buildings in Wales from offices in England to become more fully engaged with the sector in Wales and with the new legislative framework in Wales.
- 2.3 Through this Forum, Cytûn and individual denominations have responded to each consultation on guidance issued under the Act, and we are grateful that many of our comments have helped improve the final guidance. We believe that the suite of resources now available is a great help to those seeking to engage with historic ecclesiastical buildings in Wales, although it is clearly

geared more at professionals in the field than at the volunteers who undertake day to day care of our buildings.

- 2.4 The Forum has also established sub-groups on (for example) the implications of community asset transfer for churches, and the impending revision of the secondary legislation regarding so-called “Ecclesiastical exemption” (see section 3 below).

3. Protection for listed buildings and scheduled monuments

- 3.1 The procedures for Listed Building Consent for ecclesiastical buildings are the same as those for any other historic building. However, the Ecclesiastical Exemption (Listed Buildings and Conservation Areas) Order 1994 provides for six of the member denominations of Cytûn to use alternative procedures. [These are: the Church in Wales; the Roman Catholic Church; the Methodist Church; the Baptist Union of Wales; the Baptist Union of Great Britain; and the United Reformed Church. The United Reformed Church is seeking to be removed from this ‘exemption’]. It is important to understand that (unlike in Northern Ireland) these churches are **NOT exempt from the law** or from the requirement to obtain listed building consent or conservation area consent. Rather they are permitted to use an alternative consent system which enables those who understand the requirements of a place of worship to have input to the decision.

- 3.2 The ‘exempt’ denominations believe that the ‘Ecclesiastical Exemption’ offers assurance to our built heritage and value for money for the following reasons:

3.2.1 The terms of the Order ensure that ‘exempt’ denominations have sound procedures that reflect the secular system of Listed Building Consent and which are at least equivalent in rigour to those operated by the secular authorities.

3.2.2 Approval of proposals is given by an independent decision making body after expert advice and consultation.

3.2.3 The public are notified of proposed works and are able to comment on proposals.

3.2.4 The ‘exemption’ provides excellent value to the tax payer in removing the obligation to consider listed building consent on a large number of listed

ecclesiastical buildings from local authorities (but with consultation with those authorities).

3.2.5 Most 'exempt' denominations apply similar procedures for proposals to unlisted buildings so the exemption gives a measure of protection to those too.

3.2.6 The 'exemption' requires that each building has a regular condition inspection to inform and drive decision making and proposals for alterations are given detailed consideration by experts knowledgeable about ecclesiastical buildings and their use. This also helps to ensure that such buildings remain in regular use – by far the best way to ensure their preservation.

3.3 We understand that Cadw intends to bring forward a revision of the 1994 Order, under the Historic Environment (Wales) Act, during 2018, and we are currently engaged with them on the detail of this.

4. Protection for buildings and monuments at risk

4.1 Cadw's [Strategic Action Plan for Historic Places of Worship in Wales](#) estimates that 10% of such buildings are at risk or vulnerable. We would suggest that this is a serious underestimate, and that many more are at risk of serious deterioration or total loss.

4.2 The greatest risk to ecclesiastical buildings in Wales is caused by their under-use and, in some cases, by their loss of viability. This relates partly to declining patterns of regular church attendance and financial support, and also to the unsuitability of many historic places of worship for modern worship or other uses. All our member churches are very aware of this issue, and it is a regular part of discussion at the Historic Places of Worship in Wales Forum (see 2.2–2.4 above). These issues are explored further in the National Churches Trust's report referenced at 1.1 above.

4.3 We believe that the best way to protect the majority of these buildings is to enable sympathetic adaptation so that they can continue to be used for their intended purpose, i.e. the worship of God. However, in some cases population movement and other social changes make such use, even with adaptation, unviable. Often the listing makes sale of the building for an alternative use very difficult, and can lead to the unintended consequence of

historic buildings standing empty and deteriorating. This is an outcome no-one desires, and we would welcome any steps that can be taken to forestall such eventualities.

- 4.4 We are especially concerned that in some towns in Wales, a large number of places of worship have been listed, well beyond the number that could ever be used – even with adaptation – as places of worship or auditoria. We would like to see in such circumstances some consideration being given to prioritising buildings so that the most important are kept even if others must be de-listed, or heavily adapted.

5. Facilitating collaboration within the sector

- 5.1 See 2.2–2.4 above regarding the Forum and the excellent collaboration which is achieved across our part of the sector.
- 5.2 The Forum has established a sub-group to discuss the implications of community asset transfer schemes for ecclesiastical buildings. While supportive in principle of maintaining such buildings through collaboration with community groups, the legal constraints on church bodies (see 1.1–1.2 above) can make such routes challenging, expensive and time-consuming. The sub-group aims to ensure that any proposals in this field brought forward by Welsh Government will meet the needs of historic ecclesiastical buildings and their owners, as of others.

6. Maximising the value of heritage tourism

- 6.1 The role of ecclesiastical buildings in promoting heritage tourism has been a major discussion point in the Forum, including helpful input from Visit Wales. A number of ecclesiastical buildings play a major part in heritage tourism – e.g. the cathedrals of Wales; [Coleg Trefeca](#); etc. A number of our member churches are involved in projects such as the Cistercian Way (<http://www.cistercianway.wales/>), which was launched at the Cytûn pavilion in the National Eisteddfod 2016. However, we are aware that there is much untapped potential in this area, and would welcome ideas from the Committee on how our contribution to this aspect of tourism in Wales could be developed further.

7. Cadw's future status.

- 7.1 We have not as churches expressed a view regarding Cadw's future status. We would, however, point to the inherent costs (financial and human) in any

reorganisation, and we would be very cautious about “change for change’s sake”. We currently enjoy a better and more fruitful relationship with Cadw than at any time in recent history, which is to the advantage of Wales’s built heritage and its religious history. We would not wish to see this lost as a side-effect of a major reorganisation.

8. This response may be published in full, and we would be glad to assist further in the Committee’s inquiry as it proceeds.

I write in response to the Consultation on the Inquiry into Historic Environment published by the Culture, Welsh Language and Communications Committee of the National Assembly for Wales. The National Churches Trust welcomes the introduction of the Wales Historic Environment Act 2016 and the beneficial changes for historic environment protection that it contains. We recommend that the Welsh Government now look at what support those tasked with looking after Wales' bounty of heritage buildings and monuments should be offered to protect the historic environment.

The National Churches Trust supports and promotes church buildings of historic, architectural and community value through support, advice and grant giving. We are an independent, UK-wide charity supporting all 42,000 churches, chapels and meeting houses of all Christian denominations. We believe that places of worship are an integral part of our nation's architectural heritage and play a vital part in building and sustaining local communities. The Trust is keen to raise the profile of churches and chapels in Wales, which has resulted this year in our [Sacred Wales](#) campaign to identify Wales' favourite place of worship, and the inclusion of over 200 churches and chapels on our [ExploreChurches](#) tourism website. In 2017 we have also launched a Partnership Grants programme in Wales, match funded by the Church in Wales.

The National Churches Trust is a member of both the Wales Heritage Group and the Wales Places of Worship Forum, and supports consultation submissions made by these groups. We are, however, especially concerned about the future of historic places of worship in Wales, the challenges this special sector faces, and the solutions that are needed to help the thousands of volunteers who look after these wonderful buildings to sustain them at a time of falling congregations and community interest. Churches are a unique group, in that they are run by volunteers from the community rather than heritage professionals. They are often reliant on external support and advice on how to

Keep their buildings open and sustainable. Often that support comes from infrastructure bodies, such as Church in Wales dioceses or Addoldai Cymru, but it is also important that the wider sector has a better understanding of the challenging circumstances that Wales' places of worship face. We urge the Welsh

government to support the development of a training and capacity building programme for church and chapel volunteers, and for support officers in Welsh religious infrastructure bodies, to help encourage sustainability of historic places of worship in Wales. This training should also be available to local planning authority staff who will use the new provisions within the Act, to ensure that they are familiar with the unique challenges facing churches and chapels in Wales.

The National Churches Trust, on behalf of the Wales Places of Worship Forum, conducted a survey of churches in chapels in Wales to help identify issues and support needs affecting the sector. Over 200 churches and chapels completed the survey, the results of which are available in English and Welsh on our website at:

<http://www.nationalchurchestrust.org/news/future-wales%E2%80%99-churches-and-chapels>

The survey supports our view that training and systems improvements are needed to address critical sustainability issues for churches and chapels related to the following critical issues:

1. A severe shortage of volunteers to look after church and chapel buildings.
2. A lack of skills needed to manage churches, fundraise for repairs, or development community engagement plans.
3. A lack of funding for Churches and chapels to carry out regular maintenance.

The National Churches Trust would welcome a dialogue with Cadw and the Culture, Welsh Language and Communications Committee on how the support needs of churches and chapels can be met.

Protection for buildings and monuments at risk

As an important funder of projects to repair, maintain and improve the community facilities of churches and chapels in Wales, the National Churches Trust welcomes the increased oversight of and support for the historic environment contained within the Act.

Where the National Churches Trust considers there is room for improvement is in the protection of heritage at risk. Whilst Cadw undertakes a survey of heritage at risk, it does not currently publish the results of that survey. Both Historic England and Historic Scotland publish 'Heritage at Risk' lists. These lists are helpful tools in communicating the issue of 'at risk' buildings to a wider audience, and encourage collaboration between heritage organisations, local authority officers, owners and

Building Preservation Trusts in trying to save redundant and neglected assets. The National Churches Trust puts significant weight on heritage at risk when assessing the urgency and case for investment of projects competing for bids. At present, Welsh churches are at a disadvantage to their competitors for funding in England and Scotland due to the opaque nature of the Cadw survey. The Trust would welcome a more transparent approach to heritage at risk in Wales, which would help planners, funders and owners of heritage better understand priorities for conserving the historic environment.

Facilitating collaboration within the sector

Cadw published a Strategic Action Plan for Historic Places of Worship in Wales in 2015. This important document resulted in the creation of the Wales Places of Worship forum, and contains many valuable proposals for supporting churches and chapels. The plan identified the creation of Sanctaidd, a new non-denominational organisation to support places of worship across Wales as a critical partner for Cadw. Unfortunately, Sanctaidd has not proven sustainable, and was wound up in 2017. The National Churches Trust has been working with former trustees of Sanctaidd to identify a way forward, and has already taken on some elements of Sanctaidd's plans for church tourism, funding and maintenance. The Trust would welcome the opportunity to work with Cadw to explore a re-drafting of the strategy to recognise the loss of Sanctaidd and the role that the Trust is now playing to support the sector in Wales.

The Trust is concerned with the suspension of Cadw funding for the historic environment, and the closure of the Heritage Lottery Fund's Grants for Places of Worship programme. We have seen the loss of government funding impact on the funding mix for Aberdare, St Elvan's ambitious conservation and re-ordering project. We urge that Cadw's grant giving function is returned, and that the Welsh government convene a panel to explore the future funding needs of the ecclesiastical and wider heritage sector. The National Churches Trust will continue to play a role in funding, but would appreciate a more coordinated approach to funding conservation and maintenance needs that would also make it easier for volunteers to apply for and manage grants.

Thank you for the opportunity to submit additional evidence for the consultation. The National Churches Trust would welcome the opportunity to participate in further discussions about the historic environment once the consultation has closed.

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.

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and
Communications Committee
Amgylchedd Hanesyddol / Historic Environment
CWLC(5) HE06
Ymateb gan / Evidence from Royal Town Planning Institute (RTPI)

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

RTPI Cymru welcomes this opportunity to respond to the Culture, Welsh Language and Communications Committee on their inquiry into the historic environment. We responded at length to the consultations on the regulations required by the [Historic Environment Act and associated guidance \(January 2016\)](#), and on the update to [Planning Policy Wales, Chapter 6 \(June 2016\) \(Historic Environment\)](#).

Our comments in relation to the terms of reference for this Inquiry are set out below.

Implementing the Historic Environment Act

A key element of implementation of the Act will be the momentum behind the preparation of secondary legislation and related guidance. We appreciate and support Welsh Government's commitment to implementing the Act quickly and effectively. Nonetheless, there is further secondary legislation and guidance required. It is important that the Welsh Government maintains the momentum required with this to ensure that the Act can be fully and effectively implemented.

The most critical success factor for the Act will be the resources available to implement it. Declining resources in local authorities has led to a decline in local authority expertise. Greater resources are needed for this sector in both Local Authority Planning (LPA) departments and within Cadw. The measures and guidance which are now available as a result of the Historic Environment (Wales) Act 2016 represent profound progress in safeguarding much of the distinctiveness of Wales. However, the best of tools require adequate resources to deliver the best

outcomes. There are particular concerns with regard to the capacity and skill set available to LPAs in delivering their responsibilities following the reductions in funding available to local authorities. Specialist resources to handle historic environment workload are known to be under particular strain. Now, following the enactment of the Historic Environment (Wales) Act 2016, there is a strong case for the Welsh Government to be pro-active in encouraging and supporting LPAs in ensuring that these important services are adequately resourced.

Implementation of the Act will require all stakeholders to look at the way in which the historic character of Wales and its settlements are managed. Planning Policy Wales (PPW) (para 6.4.9) makes it clear that “development proposals will be judged for their effect on listed buildings and their settings, and on the character and appearance of conservation areas.” However, with diminishing resources in LPAs and in particular the loss of specialist skills, there is growing concern that these considerations are not being given sufficient weight through the development management process. There is a growing need for Welsh Government / Cadw to monitor these trends, with a view to providing support where needed and where necessary using their powers of intervention. We also believe that there is a case for research on this issue, to measure the situation.

The culture change within the planning system, including the pre application stage of the process, needs engagement and input from Cadw. Cadw have an important role in helping to contribute to the evolution of designs within listed building consents, rather than the regulatory end point/final decision stage for non-delegated decisions. Bringing alternative use back into unused and under used listed buildings needs wider and earlier engagement from LPA Conservation and Cadw officers to bring forward appropriate schemes.

Protection for listed buildings and scheduled monuments

Concern has been expressed that often few of the individual buildings in the distinctive communities around Wales which grew up during the industrial revolution meet the standards normally applied to secure listing. As a result, areas of profound historic character often lack the tools to ensure their future, in particular resources for conservation are often scarcely available in Wales's more deprived communities. We believe that there is a need to look at mechanisms for redressing this imbalance.

We believe that Conservation Area Appraisal is a key mechanism for helping to achieve the objectives of the Act. Having up-to-date conservation area appraisals

is a critical success factor in contributing towards the objectives set out in section 6.2 of PPW. While their value is recognised in PPW, we believe this should be strengthened. A programme for each LPA for preparing and updating Conservation Area Appraisals would help to ensure good quality development plans, contributing to the objectives set out in Section 6.2 of PPW. We also support the input of Cadw, and other stakeholders such as landowners etc. into Conservation Area Appraisals. However, this will require additional resources, as already highlighted.

It is also important that the setting of heritage assets is recognised and fully considered. Cadw should have the key role in helping to move forward proactive advice on setting.

Protection for buildings and monuments at risk

We recognise that the planning system has a major role to play in relation to protection and reuse of listed buildings and scheduled ancient monuments, alongside other consent mechanisms, such as scheduled monument consent.

There is a need to review and maintain up to date planning guidance, reflecting the new legislation, to ensure local authorities and others know what approach to take in regard to future proposals for protection, conservation or development . This should address how development plans and other material such as design briefs or development briefs should take account of the legislation. There should also be clear guidance on development management and enforcement matters such as planning conditions related to the historic environment, and the powers of local authorities to intervene where buildings or other structures of heritage value are at risk due to neglect or inappropriate developments.

Within planning policy and guidance there should be a recognition of the benefits of development which protects and is sympathetic to the historic environment but which can also enable viable economic proposals which can help make sites financially secure for the longer term.

There should also be clarity of the ways in which local authority planners, the Planning Inspectorate and others can access specialist information and guidance knowledge from Cadw. This should cover consultation on development plans and handling advice on development proposals.

The availability of people with specialist building and other skills to restore listed buildings and scheduled ancient monuments is crucial to future initiatives. Cadw should be encouraged to carry out an audit of such skills available in its own ranks, those of other public bodies, the National Trust which organises its own skills base, and more widely. Such an audit could identify current or emerging skills shortages and advise on how they can be addressed, possibly expanding existing training courses or opening new ones.

Cadw could bring forward greater monitoring of buildings at risk, with more emphasis on an action plan and implementation schedule for identified buildings.

Facilitating collaboration within the sector

The ability of LPAs to protect and to assist the viable use of listed buildings and scheduled ancient monuments depends on the availability of staff with specialist knowledge. It would be unrealistic to expect all LPAs to have the necessary skills within their own staff. LPAs should be encouraged to develop combined specialist resources to cover this matter, as well as developing relationships with private sector consultancies where such skills may exist. Cadw could provide some regular training courses to raise the skill of planning practitioners in relation to heritage buildings and structures and to relevant legislation.

Maximising the value of heritage tourism and Cadw's work to meet its income generation targets

There are already numerous examples where a positive response from the planning system has enabled listed buildings and scheduled ancient monuments to become more successful as tourist destinations, thus generating more income for the owners (including Cadw) and supporting commercial operations in the surrounding area. The relevant planning guidance should be examined and if necessary updated to ensure that such a positive approach is followed where it does not harm the integrity of the historic heritage.

Matters such as access for public and private transport, links to bus routes, cycle ways, long distance footpaths, the availability of public conveniences, and access to nearby services should all be addressed when considering planning applications or providing advice in design briefs etc.

We also believe that PPW should be expanded to include the role of the historic environment as a critical asset for the tourism economy, and its role directly and indirectly in providing employment.

Delivery of Baroness Andrews' Culture and Poverty Report

Planning guidance should emphasise the particular value of surviving heritage, including industrial heritage, in deprived communities. Protecting and encouraging the viable reuse of suitable buildings or features in these areas will produce not only environmental and economic benefits but also more intangible benefits of creating a positive perception of an area's potential.

The report by Baroness Andrews shows how museums, libraries, archives, historic monuments and arts organisations are key resources to inspire people to learn and gain skills. They can help individuals and communities develop confidence and a sense of identity. The report made a compelling case for all involved to make a concerted effort to work together more effectively to maximise the benefits cultural participation can have for those living in our most deprived communities.

Collaboration with heritage assets in the private sector

The planning system must deal equitably with protection of heritage buildings and features, and considering planning proposals for them, whether in public or private ownership. However the planning system can through development plan policies, and other aspects such as local development briefs or tourism strategies, provide a context and a close and mutually beneficial relationship between heritage assets in public and private ownership and their surrounding areas.

Public bodies with responsibilities for listed buildings need to lead by example to give them credibility in persuading others to maintain buildings in sound condition and find sustainable long term uses where original uses have become redundant. However we are aware that funding is important to underpin such efforts and the pressures on public finances are an obvious limitation currently. There is a case for more extensive guidance for public authorities in the management and disposal of listed buildings, and more energetic monitoring of the condition of such buildings by Cadw.

Cadw's future status

Our comments in relation to the future status of Cadw relate to the level of expertise available at Cadw and the availability of that expertise to local authority planners and others needing advice and support. This should be maintained at a high level, with appropriate resources to enable this.

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and
Communications Committee
Amgylchedd Hanesyddol / Historic Environment
CWLC(5) HE07
Ymateb gan Gastell Fonmon / Evidence from Fonmon Castle

Pre Note

I have read the submission from the Country Landowners and Business Association and endorse its contents. I have deliberately tried not to repeat the valuable points made therein.

Introduction

I have played a part in Wales' Historic Environment and in its tourism industry for many years. Most recently I have sat on both the Heritage Environment Group and the Minister's External Reference Group throughout the long gestation of the 2016 Bill.

I also Chaired the Historic House Association for Wales until 2014, and formerly sat on Mrs Hart's Tourism Advisory Panel.

Perhaps even more important is that I have owned and managed Grade I, II* and II listed buildings, and an Historic Garden, an SSSI and other heritage assets for more than 20 years several of which are open to the public.

I am President of the Vale of Glamorgan Association of the National Trust, of our Local History Society and a former President of Glamorgan Country Landowners.

I am a Council member and former Governor of the United World College of the Atlantic which is based in the historic St Donats Castle.

Finally I am Chair of the UK Adventure Activity Licensing Service which gives me wide experience of young people utilising historic landscapes and coasts for leisure/training etc.

I set out my submission with reference to each of the Terms of Reference although there are frequent overlaps.

My apologies to the Committee for not submitting this document bilingually, but I do not have the personal resources to have it translated into Welsh.

1 Implementation of the Historic Environment Act

I feel that this is progressing well although inevitably there has as yet been limited action at ground level as all parties digest the regulations and guidance stemming from the Act.

The one area about which nothing has yet been indicated is the formation of the Advisory Panel, provision for which was included in Part 4 of the Act. As the practical outcomes of the Bill emerge and as the Minister takes forward the integration of the Historic Environment within the Economy portfolio, I believe that the Panel will be able to provide valuable advice. Its weight will be increased if parts of Government and Local Authority activity in the Historic Environment are subject to change as noted later in this submission.

2 Protection for listed buildings and scheduled monuments and 3 Protection of buildings and monuments at risk

The great majority of the practical implementation of the aims of the Act will fall to Local Planning Authorities (LPAs). The future of LPAs in Wales has recently been uncertain owing to questions regarding implementation of the recommendations of the Williams Commission.

I believe that heritage protection should be a classic example of where groups of LPAs should work together to form unified teams of officers to cover a region of Wales. The reduction in existing officer numbers and the increase in the scope of their duties e.g. many environmental protection issues are now handled/reviewed by conservation officers has meant that both expertise and capacity has been lost. This in turn leads to loss of a level playing field as one LPA may have an expert in say ecclesiastical buildings, but another may not. Co-operation would allow each LPA group to have officers with appropriate expertise in most fields.

The CWLC committee will no doubt recognise that such team building will take time and will delay full implementation of parts of the Act but I believe that this will be a price well worth paying both in terms of public funding and longer term protection. In the short term the powers are now there for any LPA to tackle serious or urgent problems.

Specifically in respect of heritage assets 'at risk' I believe that Welsh Government centrally (whether via CADW or other channels) needs to devote greater time and resources to reviewing and detailing which assets are at risk, their current status, the significant elements which may be lost etc etc. If this is left to the LPAs, lack of

resources will determine that it is not carried out, and consequently any action/enforcement may be misdirected or wrongly prioritised. Simple publication of the findings might well initiate action by owners to forestall likely intervention by LPAs.

Meanwhile all four Ministers who piloted the 2016 Bill endorsed the principle that the best solution for built heritage assets was for them to be brought into sustainable use economically. The ongoing pressure on public resource emphasises this need. It follows that so long as the significant elements of these assets are retained, every effort must be made by LPAs to facilitate well managed change in order to achieve sustainability. At present this is by no means always carried out in practice with “No” being the default response.

4 Facilitating collaboration within the sector.

Given the wording of Term7 below I assume that this Term of Reference is in consideration of collaboration within the public sector. LPA collaboration needs have been noted above and I believe the Minister is actively promoting collaboration throughout Welsh Government in this area. This is vital for the best use of limited resources.

As between the main public bodies e.g. CADW, National Museums, National Library, Royal Commission etc much will depend on the final structure of how they are managed within Welsh Government. There is already some excellent collaboration, but the multiplicity of organisations means that much resource is expended in inter-organisational dialogue.

5 Maximising the value of heritage tourism and CADW’s work to meet its income generation targets.

I would most strongly refer the Committee’s attention to the Heritage Lottery Fund sponsored report by Oxford Economics into The Impact of Heritage Tourism for the UK Economy (Aug 2016). Most specifically I would refer members to p 27 of that report and figures 22 and 23 thereon. This notes “Heritage Tourism ‘punches above its weight’ in the North East, Wales and Scotland. ...”.

The most important lesson to be understood is that heritage tourism does not stand alone. A high value site – be it landscape, buildings, gardens or any other heritage asset – needs relevant infrastructure. If visitors find access difficult, or they cannot park nearby, or there are no toilets, or no litter bins (or only

overflowing ones), they will have a negative experience regardless of the attractions of the heritage itself.

Signage, petrol stations, opening hours, and many other factors can contribute to a visitor coming to Wales regularly, or recommending their friends to do so – or the opposite.

The perceived uncertainty of the weather in Wales also promotes the value of built heritage and museums etc., as they provide the opportunity for covered activity.

VisitWales, CADW and other public sector bodies open to the public have made big strides recently in understanding and improving both the offer to visitors and the management of their own sites. (As for CADW itself the urgent need is to settle its future structure and organisation. It will not maximise its potential in times of constant uncertainty.)

Thus I believe Welsh Government needs to focus more attention is in the understanding of what creates negative feelings amongst visitors and then taking action to counter them or to encourage others to do so.

Often the causes of negativity e.g. litter, eyesores etc., are concerns that are equally shared by local communities. So this is an area where Welsh Government and LPAs can collaborate to the benefit of both the visitor economy and the resident population.

The other area highlighted by the Oxford Economics report is that Wales attracts a disproportionately small number of overseas visitors. Many surveys have shown that heritage is a primary driver for overseas visitors to come to the UK. The report notes the importance of this because of the higher spend per visit (also higher for visits to built heritage and museums than to natural heritage) p 24 and fig 19.

This would indicate that Wales needs to put more effort into looking after such visitors (much is done to try and attract them, but word of mouth from satisfied visitors is far more effective and far less costly). Again more investigation of their negatives would be invaluable.

Finally in a world of ever increasing personal use of technology, the effort to enable visitors to find desired information via personal communication devices must be redoubled. As example, the Archaeological Trusts' Heritage Environment

Record database 'Archwilio' has vastly improved its accessibility over recent years, but it is still a long way from being the visitor friendly super-app that it needs to be to fully promote the Heritage Environment in Wales.

As an example Google announced on August 17th 2017 that "Google Maps will in future incorporate a "Questions and Answers" feature so you don't have to call ahead when planning a trip." Is Archwilio actively working to ensure Wales' heritage data is included in the Google Map Q & As?

Despite all budget constraints I believe that this is one area that would greatly benefit from more resource, and that it would produce pay back both rapidly and with a high multiplier.

6 Delivery of Baroness Andrews' Culture and Poverty report

I understand that transport has become a significant 'block' to advancing the recommendations of the report. Those who were identified as having least access to cultural activity largely have least access to private transport. Numerous initiatives have commenced to connect them to cultural activity. A number of these involve taking groups, often of young persons, some considerable distance from their domiciles.

This can only reasonably be done via minibus or coach transport. A considerable number of such visits are needed before those being assisted commence to take ownership of their own involvement with cultural activity which is key to achieving the benefits that Baroness Andrews' report envisaged. Thus the costs of transport are high and I understand that lack of resource for this is limiting progress.

Linking to the next Term of Reference, implementation of Baroness Andrews' report would be facilitated if private sector assets were included more often. There are often more of them in any one locality, thus improving the chances of buy-in by residents of that community – and allowing access without expensive transport needs.

As the archaeological Trusts have found, local interest in sites has often been highest amongst the young.

7 Collaboration with heritage assets in the private sector

I believe that such collaboration is essential both to maximise the value of the heritage assets to the people and communities of Wales and to support the growth and development of the visitor economy.

The built heritage has long acted as a focal point for local communities especially in rural areas. Even where not formally open to the general public there is often extensive use of heritage buildings or land for a wide variety of community activity.

Meanwhile heritage tourism will always rely heavily on private as well as public assets and collaboration. The recent appointment of Jason Thomas as Director of Culture, Tourism and Sport following lead appointments with CADW and the Museums, Archives and Libraries divisions clearly demonstrates that Welsh Government places a high value on the linkage between heritage and tourism. I greatly welcome Jason's appointment and looks forward to doing what I can to support him and his team.

I would strongly recommend that once the Advisory Panel is formed that the Minister tasks it as one of its priorities to examine the existing nature of collaboration and make give advice as to how this might be improved.

Organisations such as the Historic Houses Association have enormous experience in this field having more member premises open to the public than any other body, and would be well placed to take part in any dialogue on the subject.

8 CADW's future status

I am neutral in respect of any changes and will be happy to work with any new regime. As noted earlier uncertainty is never good, and so an early resolution to the various proposals would be welcomed.

Whatever structure is adopted, I would ask that Welsh Government do consider the 'level playing field' argument. Visitors very seldom distinguish between public and private sector attractions, they are influenced by offer, price, etc etc.

Wales needs both public and private supply of offers for visitors, and care should be taken that public promotion and tax advantages enjoyed by the public sector organisations does not result in 'beggar thy neighbour'. If such competition forces the closure of private sector offers, then both visitors and local communities lose out.

That is also a waste of resource, was amply demonstrated, intra public sector, when every small town and area of Wales was being supported in its localised promotions by the old Tourist Board. VisitWales has long recognised that this was less productive than growing the overall cake, and has changed its emphasis to more generic promotion, other than for major events. It will be important for the same error not to be made in respect of the heritage.

INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and the three fire and rescue authorities.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
4. The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.
5. The WLGA welcomes the opportunity to contribute to the Culture, Welsh Language and Communications Committee inquiry into Historic Environment.
6. Local authorities have, in general, welcomed the Historic Environment (Wales) Act and the resulting new duties. Together with the legislation, Cadw has issued a suite of guidance which again is broadly welcomed. Responding to the consultations on these guidance documents has been a significant undertaking for LAs and NPAs (National Park Authorities). Officer time is also spent understanding the guidance and considering the implications on service delivery. There are still further guidance documents to be issued by Cadw.
7. The issue of resources within local authorities and national parks to implement the new duties is very real. The number of officers employed to

work on historic environment matters has declined in the last few years and local authorities and national park authorities are having to prioritise the reactive legislative/case work rather than the proactive regeneration/tourism focused work.

8. Duties in relation to listed buildings across local authorities vary depending on whether an officer within a local authority/national park authority has been given delegated status by Cadw to determine Grade II LBC without reference to Cadw. Monmouthshire, Carmarthenshire, Wrexham, Pembrokeshire Coast, Brecon Beacons, Vale of Glamorgan and Pembrokeshire all have delegated status. The number of listed buildings within the local authority/national park will also have a bearing on the resources required.
9. Cadw, WLGA and local authorities are very aware of the resilience issues facing this sector and are considering alternative models of delivery. As a result, a couple of interesting pieces of work are ongoing. The seven North Wales LPAs (inc Snowdonia NPA) recognised that specialist services such as the built heritage services within local planning authorities were under strain. A project was established to review and redesign Built Heritage Services in North Wales including exploring the potential of a regional set up. This has involved the Cadw, LA Conservation Officers and the two Archaeological Trusts operating in North Wales in determining where improvements can be made to service delivery and a number of proposals have emerged. These include streamlining local policies, pooling resources to improve capacity and resilience, reviewing the timing of advice from Cadw and promotion of the service. Also as part of this work a number of proposals relating to listed building consent are under consideration ranging from improving the quality of the LBC applications received through to increasing numbers of LPAs that have delegation from Cadw and the role of local government and Cadw in enabling this to happen.
10. Alongside the North Wales work, a Cadw led Task & Finish group (with WLGA and local authority representation) has been established to consider broadly similar issues to the North Wales LPAs but for all Wales. Learning from the work taking place in the North, this group is due to report to the Cabinet Secretary shortly and is likely to include recommendations relating to LBC.
11. In addition to this review work, informal collaboration between authorities continues on a regular basis. Sharing knowledge, skills and case studies is

facilitated through the Conservation Officers forum meetings held in North and South Wales and more basically through email requests for sharing advice, real life examples and supporting each other.

12. There are some positive examples of local authorities undertaking proactive work and developing buildings at risk strategies which has resulted in the saving of several key buildings. However, with a reduction in available resources in local authorities and national parks, this proactive work is likely to decrease.
13. With their wider role, local authorities are well placed to promote heritage tourism. The importance of heritage in its widest sense on tourism is not always fully appreciated. A recent report by the Historic Environment Group – Heritage Counts (<http://cadw.gov.wales/about/partnershipsandprojects/aboutpartners/histenvgroup/?lang=en>) – has usefully quantified the benefits of heritage to Wales and there may be opportunities in the future to widen this exercise to include the contributions made by other stakeholders such as local government. Local authorities through their tourism function work with Cadw to promote heritage tourism and maximise tourism spend in the area and at the specific heritage assets.
14. The WLGA supported the report by Baroness Andrews on how culture and heritage bodies can contribute to reducing poverty and worked with the Welsh Government and other partners to implement the report recommendations including the establishment of Pioneer Areas. The WLGA also supported the subsequent and related work of Professor Dai Smith on the Arts in Education and again has worked with the Welsh Government and partners like the Arts Council for Wales in taking this work forward. Most recently, the WLGA has supported the work of Welsh Government in developing the new curriculum – ‘A Curriculum for Wales a Curriculum for Life’ – following the Donaldson Review. The Association has welcomed in particular the focus on the “expressive arts” as an Area of Learning and Experience within the new curriculum. These developments all build on the work of Baroness Andrews and it is important that they develop further in complete alignment and coordination. At a time when financial resources are under pressure it is important that they are used as effectively and efficiently as possible.

15. Many local authorities have been successful in securing Heritage Lottery funding to improve heritage assets within our towns through the Townscape Heritage Initiative. Many of these town centre buildings are in private ownership and through collaboration and financial incentive, local authorities have been able to secure investment in these properties. Local authorities work with private owners of heritage assets in a number of different ways – through the consenting process, offering advice and guidance, identifying funding, promotion of the asset if appropriate.
16. The WLGA maintained a good working relationship with Cadw officials during the legislative process preceding the Historic Environment Act and there continues to be regular dialogue albeit less than during the Bill stages. At a local level, officers work closely with the relevant Cadw officials.
17. With any service reconfiguration as referred to in earlier paragraphs, the WLGA has suggested to Cadw that funding should be made available to assist local authorities with implementing change. The WLGA has also suggested that there should have been training funded by Cadw to accompany the suite of legislative changes and accompanying guidance documents. Financial restrictions have been offered as one of the reasons for this not happening. The WLGA would like to see a specific budget within Cadw to be used to support local authority change activity relating to the historic environment. Cadw's impact is curtailed by resource pressures and unless additional resources are identified this will continue to be an issue.

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Amgylchedd Hanesyddol / Historic Environment
CWLC(5) HE09
Ymateb gan Coed Cadw Woodland Trust / Evidence from Coed Cadw Woodland Trust

Background

Coed Cadw Woodland Trust is the UK's largest woodland conservation charity, working for a UK rich in native woods and trees, for people and wildlife. In Wales alone we have over 14,000 members and 85,000 supporters. We manage over 100 sites in Wales covering 2,697 hectares (6,664 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 14% of the landscape and less than half of this is native.

Everyone benefits from trees, woods and forests – even if they never see or touch a tree, or walk in a wood. They help supply us with the essentials of life, such as clean air, water, building materials and fuel. Trees offer other riches too: our lives would be far poorer without their place in our landscapes, literature, language and livelihoods.

Implementation of the Historic Environment Act

We really welcome bringing Historic Parks and Gardens into statutory designation as a means to give them greater protection in the planning system. It will also presumably help prioritise them for subsidies and grants which will encourage owners to manage them to best practice to secure their legacy for present and future generations. Even so they may be extremely vulnerable as they are very attractive places for development. Their open structure gives the appearance that some development, for example golf courses or housing projects could be squeezed into parts of the area while keeping many of the main design features. This situation can be exacerbated if pre-emptive felling of trees takes place to expand available open space as the trees are not protected from this activity. We would like to see Local Authorities given a duty to carefully monitor such designated areas and applying S211 controls if they consider it expedient to do so because the trees are at risk.

We would like to see a duty to monitor and where necessary use S211 controls extended to designated Historic Landscapes. Many of these Historic Landscapes are made special by the rich age structure of the trees within them. Ancient and other veteran trees add a great deal to their special historic character and biodiversity but are extremely vulnerable. They are irreplaceable although many

can be felled or damaged within the space of half a day – little time for a Local Authority to become aware and act. It is our view that using S211 is a way to keep the burden on both owner and Local Authority to the minimum especially if a management agreement is put in place at the same time.

Historic Parks and Gardens are not the only historic tree landscapes at risk. Priority wood pasture and parkland is threatened and unlike historic parks and gardens or ancient woodland there is no source of information of their location and quality. We would like to see an inventory developed along the lines of the Historic Parks and Gardens to identify important heritage landscapes where man has had a significant, deliberate influence on the character of the area albeit one that has not been identified through landscape plans. They are as much the story of the landscape as those related to rich and powerful and deserve recognition. They should also be protected through planning policy.

Outside historic landscapes, wood pastures and parkland and historic parks and gardens there are heritage trees in the wider agricultural landscape. They are Very Important Trees (VITs). They have served society usually for several hundred years and in the case of yews perhaps for millennia. An inventory of VI Trees is being developed through a citizen science project run by a partnership of the Woodland Trust, Tree Register of the British Isles and the Ancient Tree Forum. Ancient and other veteran trees on this inventory should be considered as nationally important. Given the length of time that the Welsh Government Task and Finish Group on ancient trees has been in existence we would have thought it possible for the Welsh Government to have brought forward other specific proposals at this stage, such as the statutory register for Trees of National Special Interest which would encompass all ancient trees in Wales. We are concerned there will be further delays to making sensible changes and in the meantime valuable trees may be lost. Cadw should have a role in working across Government to accelerate this process.

Together with other nationally significant trees, we would like these historic trees to receive the recognition they deserve and their value to society supported through incentives to owners to manage them to best practice. Until they are protected by a Tree Preservation Order they can be damaged by poor management practice or felled within a few hours. We would like to see a more pro-active mechanism to identify and celebrate such trees so that if they are at risk there is a higher priority for the Local Authority to protect them through a TPO. These nationally important trees should also be protected from development through Welsh Government

planning policy.

Maximising the value of heritage tourism and Cadw's work to meet its income generation targets

Historic landscapes and historic trees make the Welsh landscape extremely special. For the benefit to Wales from tourism, these landscapes and the trees within them should be prioritised for government subsidies to help owners secure this rich heritage for future generations. Supporting the role of landscapes and special trees should be a major consideration within the design and targeting of the any future land management policies once we leave the EU and the Common Agricultural Policy is no longer in place. The Welsh Government has already indicated support for increasing the protection of ancient and veteran trees in its current consultation on taking forward the sustainable management of natural resources. Cadw has an essential part to play in the development of future land management policies.

Heritage protection and implementation

The Joint Committee of National Amenity Societies (JCNAS) welcomes the introduction of the Wales Historic Environment Act 2016 and the beneficial changes for historic environment protection that it contains. Arguably Wales now benefits from having the most robust and progressive heritage protection in the United Kingdom. The accompanying advisory material should be kept under review and enhanced as necessary to ensure the Act is being adequately interpreted.

Whilst the National Amenities Societies operating in Wales feel the Act contains successful and helpful policies, not all the recommendations and requirements of the Act have been implemented. We note that some of subsidiary guidance is still forthcoming, including that to follow from the long-awaited review of the Ecclesiastical Exemption in Wales. We are keen that the Advisory Board whose members are to provide scrutiny and advice on heritage protection to the Cabinet Secretary is progressed. Until the strategic elements of the Act are in place and the missing subsidiary guidance is issued, we would suggest that it is too soon to assess the full effectiveness and impact of the Act.

The Act is a positive and robust piece of legislation, but it should be noted that it cannot be implemented effectively if local authorities are not adequately resourced with dedicated conservation professionals. We urge that thought is now given to both the recruitment and training of local authority staff who will use these new provisions, and to the monitoring of the regulations' use and effectiveness in decision making.

Where the JCNAS considers there is room for improvement in Welsh heritage protection is in the area of heritage at risk. Whilst Cadw undertakes a survey of heritage at risk, it does not currently publish the results of that survey. Both Historic England and Historic Scotland publish 'Heritage at Risk' lists. These lists are helpful tools in communicating the issue of 'at risk' buildings to a wider audience, and encourage collaboration between heritage organisations, local authority officers, owners and Building Preservation Trusts in trying to save redundant and neglected assets. An assessment of the impact of the new Act on long-standing cases of neglected listed buildings, especially those of outstanding

national importance, will need to be made, and measures taken to improve outcomes if necessary

Collaboration between heritage organisations and a future strategy for Cadw

The JCNAS is concerned that despite the Act, Cadw has very limited resources for the important job it does within the planning system. Secondly, there is no overall strategic plan for heritage in Wales, or for the state agency dedicated to heritage protection. The Wales Heritage Group fulfils a useful function in representing the voluntary sector, but there is no overarching strategy to give heritage policy direction. We would like to record the fact that the work of the Wales Heritage Group was co-ordinated by Civic Trust Cymru enabling its members to make a substantial contribution from the third sector to Welsh heritage. The demise of Civic Trust Cymru is felt keenly by the Group and also the constituent societies of the JCNAS.

We believe that Cadw's vital role in ensuring the survival of the historic environment of Wales is not adequately funded, also that the importance to Wales of its historic environment whilst recognised in legislation is not underpinned by sufficient financial support. We are very concerned that both Cadw and Royal Commission on the Ancient and Historical Monuments of Wales are under-funded. We are concerned about Cadw's grant-giving functions being suspended given that the sector relies on this source of funding. We are particularly concerned that the suspension of Cadw's grants coincides with HLF's closing of the Grants for Places of Worship programme. We suggest that the impact of this is closely monitored, and also that funding priority should always be given to ensuring the survival of the historic fabric of the historic buildings of Wales

For the sake of the historic environment in Wales and the continued success of the provisions and requirements of the new legislation, we urge that Cadw is supported and its resources increased.

We are grateful to have been given the opportunity to provide evidence to the consultation, though it has come at a time of year when many are not readily available to feed into such an important discussion with many complex issues. The JCNAS would be very willing to participate in this discussion further once the consultation has closed.

A. The CLA and the historic environment

1. The CLA's 3,300 members in Wales manage at least a quarter of Welsh heritage, including well over half of rural heritage. As by far the biggest stakeholder group of those (charitable, commercial, private, or public) who manage or own heritage, we are one of the half-dozen key stakeholders in the heritage field. The CLA believes strongly in effective and proportionate heritage protection (see 7 below).
2. The CLA's heritage adviser Jonathan Thompson was a member of the External Review Group which advised Welsh Government on the Historic Environment Review. We contributed extensively to detailed discussions on both the new policy and guidance published in 2016–17, and the Bill which became the Historic Environment (Wales) Act 2016.

B. Implementation of the Historic Environment Act

3. The CLA generally supports the 2016 Act. We had serious natural justice concerns about some of the detail, but many of those concerns were allayed by undertakings given at the time by the Minister, which have mostly been incorporated into the new guidance published by Cadw in 2017.
4. We think that the current legislation, ie the 1990 and 1979 Acts as amended as they now apply in Wales, should be available online in an always–fully–updated form, because it is important that everyone can easily find and read the legislation.
5. We would like to see two further logistically–small but important changes to the legislation to bring it into line with current best practice: the replacement of the word 'preservation' with the modern best–practice term 'conservation', and the replacement of 'interest/national importance' with 'significance'. The word 'preservation' generates a default presumption against change, a presumption inconsistent with C21st international conservation (not 'preservation') practice, with the Wellbeing of Future Generations Act's Resilient Wales (not 'Preserved Wales') Goal, with Cadw's *Conservation Principles* (not 'Preservation Principles'), with Cadw's new best practice guidance, and above all with the long–term survival of heritage, which must

be allowed, indeed encouraged, to change in properly-managed ways if it is to survive at all in the long term.

6. Subject to the above points, and to 9 and 12 below, we see the current legislation as satisfactory. It is not perfect, but significant change would have costs, not only in arguing out what those changes might be, but also in all users adapting to them. We do not think that Welsh Government – having spent five years on the Historic Environment Review, and many carefully-considered legislative changes – should now embark on a ‘blue-sky’ reconsideration of the legislation. It would be better just to develop 4 above, perhaps relabelling the familiar 1990 and 1979 Acts with *mutatis mutandis* amendments (ie on the lines, roughly, of the 1997 Act in Scotland, which mostly uses the same wording as the 1990 Act).

C. Protection for listed buildings and scheduled monuments

7. As above, we feel that the legislation is broadly satisfactory. But legislation is only a small part of heritage protection. Heritage is protected primarily by use. Modern C21st conservation best practice, captured in Cadw’s 2017 best practice guidance and 2009 *Conservation Principles*, encourages owners of heritage to work out what matters about it and then ensure that this is conserved and/or enhanced by enabling it to be relevant, appreciated, and used, and to produce (directly or indirectly) a stream of income to cover its maintenance costs. This approach makes sympathetic change easier, and harmful change more difficult; it stresses proportionality, and certainty, setting out a clear policy approach to change, so an owner who has analysed significance and drawn up sympathetic proposals taking that significance into account should be confident that consent can be obtained. It also accords with the Well-being of Future Generations Act’s Resilient Wales Goal (to “support... resilience and the capacity to adapt to change”). What matters much more than legislation therefore is (i) policy and guidance, and (ii) enabling the system to work on the ground, and (iii) better enforcement.
8. As to (i), the new 2017 Cadw best practice guidance is generally excellent and will play an important role in future heritage protection. By contrast, the revised 2016 *Planning Policy Wales* chapter 6, and the new TAN24, are not yet satisfactory, because both still have a default emphasis on “preservation” (see 5 above).

9. As to (ii), the Historic Environment Review has not addressed the fundamental and worsening mismatch between the current heritage protection system and its resourcing. This was the primary concern raised in the 2013 public consultation. This is of course not unique to heritage: mismatch of systems and resources and the need for solutions were at the core of the 2014 Williams Report recommendations. Welsh Government needs to address this problem. An obvious step, given that most proposed changes to heritage are neutral or beneficial, is to streamline legislation and procedures so that those proposals are handled in a lighter-touch way, freeing up scarce local authority and Cadw staff to focus primarily on the cases which might be harmful. Welsh Government with heritage stakeholders therefore needs to devise new more-financially-sustainable systems which can work with the resource which will actually be available, and which therefore increase the actual protection of heritage on the ground. The CLA is already involved in projects on these lines.
10. As to (iii), it is important to have better guidance on enforcement. The ‘paradox of enforcement’ is that local authorities tend not to focus enforcement on the small number of malign and difficult owners who deliberately damage heritage. Instead, it tends to be targeted on owners who have made technical breaches which have not permanently harmed the public interest, but are easier to deal with and give a good ‘clear-up rate’. That causes real harm, because stories of benign owners being ‘bullied’ by local authorities, using tools which can appear to disregard natural justice, harm heritage by discouraging people from owning it at all. The answer is (i) better guidance, drafted by Cadw with input from external stakeholders including owners, giving practical guidance on whether and when the enforcement powers should be used, and how, so they can be better targeted and more effective; and then (ii), once that guidance is in place, encouraging LPAs to use it. It is important to heritage protection that malign owners who deliberately cause serious harm to heritage are identified and enforced against; not doing that can lead to systemic harm, because malign purchasers of heritage can safely outbid benign purchasers.

D. Protection for buildings and monuments at risk

11. Cadw’s new guidance *Managing listed buildings at risk in Wales* is a major step forward which puts Wales a long way ahead of the rest of the UK because it is based on a correct diagnosis of the heritage at risk problem, as one of

use, economics, and in some cases ownership. The traditional approach in contrast mis-diagnosed the heritage at risk problem as one solely of disrepair, soluble just by telling LPAs to use a toolkit of aggressive statutory repair powers. That has not worked, and would never work, because those powers are complex, ineffective, and disproportionate, and LPAs do not use them, or focus them on the wrong targets, or fail. Even if the building was somehow repaired, without a viable use it would inevitably fall back into disrepair. Either failure to act or poorly-targeted action damage individual historic assets and the whole heritage protection system.

12. The system of 'preservation notices' proposed in the 2016 Act, if implemented, would make this worse, especially by making it too risky for any rescuing purchaser to acquire a building at risk – a disastrous change.
13. The solution is of course viable long-term use, not just repair: a building which is not viable, relevant, and used is unlikely to be put, or kept, in repair.
14. The solution is thus in two parts. The first, good advice based on a correct diagnosis of the problem, has already been published as *Managing listed buildings at risk in Wales*. This will not rescue every building at risk overnight, but over time addressing the right problems in the right ways will make a real difference.
15. Secondly, however, in a minority of cases – those which make headlines – it is clear that there is a use and a viable solution, and there are repairing purchasers, but the owner is refusing to implement this. In these specific situations – as Cadw's guidance says – the power to change ownership may need to be used, much more assertively and effectively than now. It is not realistic to expect local authorities to achieve that, and it would be better done centrally, potentially by a specific expert attached to Cadw. This would require only limited resource, and a few successful cases, effectively publicised, would much reduce the problem.

E. Facilitating collaboration within the sector

16. Collaboration between stakeholders helps them to understand each other, to minimise differences, and to allow heritage to speak to a greater extent with one voice. That implies formal co-operation, via umbrella body/ies. In England for example there is the Heritage Alliance, with a membership of 100+; and the Historic Environment Forum, which consists only of major

stakeholders, making debate and decision-taking easier. In Wales, what has worked very effectively was the External Review Group, the small group of key stakeholders which advised the Minister on the Historic Environment Review. Despite the wide range of stakeholders involved, the ERG almost always found a consensus, and had a real and very positive impact on the outcomes of the Historic Environment Review, the 2016 Act and the policy and guidance. The ERG, perhaps alongside larger body/ies, would be an effective model. It is important that all such bodies include the owners and professionals who actually manage heritage, as well as traditional heritage stakeholders.

F. Maximising the value of heritage tourism and Cadw's work to meet its income generation targets

17. Tourism is a vital industry in Wales, especially rural Wales, and heritage is a major motivator of tourism. The 2016 Oxford Economics report *The impact of heritage tourism on the UK economy* concluded that in Wales heritage tourism “punches above its weight”, and that heritage tourism can “be said to be more important in... Wales...compared to the whole UK economy”. Post-Brexit and post-CAP, heritage tourism might well become even more important, and current funding arrangements might change considerably. The CLA is advocating a Land Management Contract under which land managers are paid for delivering defined public benefits via a direct contract with Government, and heritage management and heritage tourism are public benefits which could be delivered and rewarded in that way. CLA Cymru is keen to discuss this with Welsh Government and Cadw.
18. Effective heritage tourism also relies on appropriate infrastructure. Visitors for example will have a negative experience if they cannot find a site, or cannot park. Apparently simple things like signage and local amenities can make the difference between a visitor coming to Wales regularly and recommending it to friends, or a failed experience. Welsh Government needs to focus more attention on developing a better understanding of what creates negative perceptions, and take action to improve the overall tourist experience. In particular, more attention is needed on overseas marketing, as Wales attracts a disproportionately small number of international tourists. This is a big opportunity, because (i) many reports have shown that heritage is a primary driver for inbound tourism to the UK, and (ii) international visitors spend more per visit.

19. It is also important to note that ‘iconic heritage sites’ formally open to the public are only a very small proportion of the historic environment; that the health of heritage not formally open is important to tourism, because tourists see it; and also above all that tourism is only a small part of the heritage economy: the ongoing management and maintenance (where financially feasible) of heritage are also key drivers of economic activity, especially in parts of rural Wales where other jobs are often scarce. We await the new economic strategy for Wales to see the role that heritage and wider rural economic activity play in this, and the support which will be involved.

G. Delivery of Baroness Andrews’ Culture and Poverty report

20. This is outside our area of expertise.

H. Collaboration with heritage assets in the private sector

21. While most CLA members are private or commercial, many (often larger members in size/turnover terms) are charitable or public. The private/commercial sector does have some specific problems (like the inaccessibility of grant funding in most cases), but to a great extent the pressures faced by owners of heritage – especially its very high maintenance costs, and the impossibility of paying these unless it can be and is put to some productive use – are common to all kinds of owner. We are therefore puzzled by the traditional public–sector view that private–sector owners are in a wholly different category.

22. Heritage cannot survive without owners (of all kinds): they are, as the Minister has said, “essential allies”. What they need is an effective framework of law, national policy and guidance, and (where realistic) support, some but not all of which is now in place, as above. For rural heritage, the CLA’s Land Management Contract (see 17 above) could be important in this. In addition, owners – including, but not only, private sector owners – need to be brought much more into collaboration, by being routinely consulted and involved (see 16 above).

23. On a narrower point, the future success of Welsh heritage and heritage tourism will depend on collaborative working between all stakeholders. It would be helpful to see greater co–operation in the promotion and management of historic assets, so that (for example) Cadw sites are

promoted in other locations and vice versa, and those managing them share knowledge more effectively.

I. Cadw's future status

24. In recent years we have found Cadw, at least at a national policy level, to be sensible, pragmatic, and proactive, working effectively in the interest of heritage protection. We would not wish to see change that might dilute or threaten that.

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and Communications Committee
Amgylchedd Hanesyddol / Historic Environment
CWLC(5) HE12
Ymateb gan Gomisiwn Brenhinol Henebion Cymru / Evidence from the Royal Commission on the Ancient and Historical Monuments of Wales

The Royal Commission: The Royal Commission on the Ancient and Historical Monuments of Wales is the research and development arm for the historic environment in Wales. The fieldwork that we undertake and the records that we curate in the National Monuments Record of Wales together constitute the evidence base for our understanding of the archaeological, built and maritime heritage of Wales, for the policy decisions taken by national and local government, planning authorities, businesses, investors and developers and for the research undertaken by academics, students and members of the public.

The Royal Commission is based in Aberystwyth and is sponsored by the Welsh Government, which contributes some £1.5m a year to our budget. The Chairman and Commissioners are appointed by the Crown to direct the work of the Commission's 30 expert staff, who are engaged in field research, curatorial and public engagement activity.

1. Questions about heritage protection in Wales:

- Implementation of the Historic Environment (Wales) Act 2016;
- Protection for listed buildings and scheduled monuments;
- Protection for buildings and monuments at risk.

Progressive legislation: The passage into law of the Wales Historic Environment (Wales) Act 2016 has put Wales in the vanguard of heritage protection. Wales can be proud of having what is arguably the world's most progressive heritage protection legislation. Among provisions specific to Wales are state-funded HERs (Historic Environment Registers) for use by local authorities in exercising their planning and development control responsibilities and measures to protect place-names and historical parks and gardens.

Practice guidance: It has inevitably taken time for the Act's legal provisions to be turned into practice guidance. Cadw has faced a substantial task of drafting numerous documents, consulting the sector, taking in revisions and publishing the results. The Royal Commission has played an active role in this process, especially in the preparation of guidance on conservation area appraisal and management.

The Commission has also been asked by Cadw to write guidance for conservation and planning officers reminding them of the scope they have to ask developers to pay for the recording of historic buildings as a condition of listed building consent. If there is one area where we still feel concern at the lack of an agreed strategy (see below) and best-practice guidance, it is in the field of maritime archaeology, where the marine resource is under pressure from aggregates extraction and plans for windfarms and tidal barriers.

There have been many positive aspects to the consultation process: one is that the sector has helped improve the original drafts by responding with practical suggestions for ensuring that the guidance is workable; another is the way that help has come from beyond the sector – there has been much goodwill and co-operation from colleagues who work in planning and environmental functions, for example.

Protection for historic place-names: Another area in which progress has been swift and positive is in the creation of a register of historic place-names as required by Section 34 of the Historic Environment (Wales) Act 2016. The task of creating the register was delegated by Cadw to the Royal Commission; we convened an advisory group of all the stakeholders, including the Welsh Archaeological Trusts, Welsh Place-Name Society, National Library of Wales and Centre for Advanced Welsh and Celtic Studies. The List was launched by Cabinet Secretary Ken Skates on 8 May 2017 with an initial list of some 350,000 names (expected to grow significantly) identified from sources that predate the First World War. The List now provides easy access to a single centralised source of information on historic place names and has been welcomed by public and professional users, such as local authorities and Government Departments in Wales faced with making decisions about proposed name changes or new names in Wales.

The need for a strategic plan: While it is too soon to assess how well the Historic Environment (Wales) Act 2016 is working, and what sort of impact it has had, it is clear that, despite the Act, Wales lacks an agreed historic environment strategy. The state heritage agencies in England (Historic England) and Scotland (Historic Environment Scotland, or HES) both have strategic plans setting out agreed objectives for the sector for the next five years: Wales has yet to produce one. In addition, though the Act makes provision for an Advisory Board whose members are to be entrusted with acting as the Cabinet Secretary's watchdog and advisor on heritage protection, it is not clear that any moves have been taken yet to constitute

such a body. It is to be hoped that once the options for Cadw's future have been considered and settled, attention will turn to the creation of an Advisory Board.

Systematic designation: A core part of the English and Scottish historic environment protection strategy is their systematic approach to designation. Members of the CWLC committee may well recall stories in the media about the most recent list to emerge from Historic England's designation activity – the range of properties added to the heritage assets register in 2017 included Underhill House, in West Yorkshire, the first modern earth-sheltered house in Britain, the Cabman's Shelter in Grosvenor Gardens, London, and the buildings that form the entrance to Willesden Jewish Cemetery, London. These listings result from annual heritage asset surveys that include a thematic element – in recent years Historic England has surveyed railway structures, buildings associated with Lesbian Gay Bisexual Transgender and Queer heritage, Brutalist and post-war architecture.

Wales does not have any such programme of systematic assessment, survey and evaluation. The Royal Society of Architects in Wales has been particularly critical of the lack of a survey of 20th-century buildings in Wales or any attempt to assess which buildings should be afforded protection through listing. Cadw admits that listing activity in Wales has been reactive, rather than pro-active, for the last decade or so, based on spot-listing applications made by members of the public concerned at the potential loss of a valued building. These spot-listing applications are rarely successful.

We believe that systematic thematic survey is essential if the best and most significant buildings and monuments in Wales are to be given a measure of protection. The remit of the Royal Commission is to undertake exactly this kind of survey, but the lack of resources is a considerable restraint on our ability to help Cadw undertake a pro-active approach to listing. We have successfully completed major, definitive surveys of historic chapels and of upland archaeology; we are currently engaged in surveys of historic parks and gardens and of the impacts of climate change on coastal heritage, but recent budget cuts have severely reduced our capacity and we are unable at present to undertake the surveys of those categories of buildings that are most under threat, including historic farmsteads and 19th and 20th century places of worship.

Heritage at risk: The identification of farmsteads and post-medieval places of worship as categories of building most at risk has come from analysis of the database of buildings and monuments at risk maintained by Cadw. Cadw also

undertakes a regular 'condition' survey of listed buildings and monuments. The task of taking steps to resolve the problems of neglect is delegated to local authorities, all of whom are encouraged to maintain their own local risk registers (there is something of a conflict of interest here in that a significant proportion of buildings at risk in Wales are in local authority ownership).

It is not clear to what degree the results of the condition survey are being used to intervene and to encourage owners to repair or protect the buildings that are identified as being at risk. This may be because Cadw and local authority conservation staff are aware that there are no easy answers, but neglected and endangered buildings are not just a heritage issue: they represent a blight that has an impact on the well-being of residents and visitors. Questions need to be asked about whether Wales is as active in regeneration as other parts of the UK, and if not why not?

Training and communication: Finally, issuing guidance and providing funding, though excellent in themselves, will not make a difference without a major effort to communicate the Act's provisions, explain them to elected members and local authority employees, and ensure that developers and others are aware of what is required by the Act. For a model for how to do this, Wales might adapt aspects of the HELM (Historic Environment Local Management) programme operated by Historic England, which offers training for local authority staff and members on a range of historic environment topics.

Underfunding: The comments made above are not intended as criticism of Cadw. Instead their purpose is to draw attention to the underlying irony that while Wales has progressive heritage protection legislation, the sector lacks a clear strategy and is underfunded to the extent that it cannot carry out some of the fundamental tasks, such as listing, that a state heritage agency exists to perform.

Cadw is not alone in lacking adequate funds. Whilst Cadw and Welsh Government are responsible for setting historic environment policy and strategic direction, the implementation of this guidance falls on a number of other bodies, including the Royal Commission (field recording and curation of the National Monuments Record of Wales), local authorities (planning strategy, development control, conservation area management) and the Welsh Archaeological Trusts (management of Historic Environment Records and mitigation work once planning permission has been granted).

All of these organisations are struggling to perform their core functions and are underfunded for the scale of the tasks with which they have been entrusted. And while the annual budget is largely committed to core functions, there is no allowance in our budgets for investment in the future. The Royal Commission has made strenuous efforts to raise funding from non-governmental sources, and has been conspicuously successful in winning major grants from such bodies as the European Union Inter-Reg Fund, the Heritage Lottery Fund, and the Arts and Humanities Research Council. Success in this field levers in additional funding for projects that we wish to undertake, but does not allow for vital investment in infrastructure.

Succession planning and IT infrastructure: Two areas of underfunding are of particular concern to the Commission and to the sector as a whole: keeping pace with technological developments and succession planning. These are of particular concern to Commissioners because our platform for managing information in the National Monuments Record will need considerable investment to keep pace with digital archive requirements if we are to continue to provide the service that the public expects in the years to come.

The other area that is becoming critical is the lack of scope for succession, the lack of opportunities for on-the-job training, the lack of skills transfer and continuity. On the rare occasions when jobs are advertised, there is no shortage of applicants – but there is a severe shortage of applicants who have the necessary experience to replace the highly experienced staff who have retired or moved on. Ideally the sector should be offering apprenticeships and training programmes, but to do so requires funds that we do not have.

2. Questions about the 'Historic Wales' proposals for increasing income and encouraging greater collaboration between Cadw, the National Library, National Museum and Royal Commission:

- Facilitating collaboration within the sector;
- Maximising the value of heritage tourism and Cadw's work to meet its income generation targets;
- Collaboration with heritage assets in the private sector;
- Cadw's future status.

Strategic partnership: The Royal Commission has played a leading role in the deliberations over the ‘Historic Wales’ proposals, and the Commission’s Secretary has been elected joint chair (with Gareth Howells of the Prospect union) of the strategic partnership that has emerged as a result.

The strategic partnership brings the four state-funded heritage agencies in Wales (Cadw, the National Museum, the National Library and the Royal Commission) together, along with officials of the three staff unions. At the first two meetings, topics identified for closer collaboration and joint endeavour include a sector skills strategy, catering and retailing strategy, the marketing of intellectual property rights, the development of a bi-lingual e-commerce platform and the development of an integrated tourism offer (an All-Wales Heritage Pass).

Are we part of the tourism sector? It is worth stressing at this stage that two of the four institutions concerned (the National Library and the Royal Commission) are not part of the tourist industry, and that their activities and relationships have a closer affinity with the education sector. The search rooms at the Library and Royal Commission are places of study and research, and our closest partnerships are with universities.

Equally, tourism is only part of what the National Museum and Cadw exist to do: research and learning also plays a major part in their activities, and Cadw has a very substantial role as the Welsh Government’s historic environment policy and advisory service (Cadw thus combines the functions that in England are now performed by two separate organisations: the customer-facing functions of English Heritage and the policy and planning functions of Historic England).

Having said that, Cadw and the National Museum run visitor attractions that are core to Wales’s tourism offer. On various occasions it has been said that Wales lags behind similarly sized nations in its performance as a tourism destination (most recently, the BBC ‘Wish You Were Here’ programme broadcast on 11 July 2017 made much of the differences between Welsh and Scottish tourism policy, to the detriment of Wales) but hard facts are difficult to find. We understand that the Cabinet Secretary has commissioned a report from Simon Thurley, former Chief Executive of English Heritage, specifically to benchmark the performance of the National Museum against similar institutions elsewhere and we look forward to seeing the results of that exercise, which may well help us all to understand the issues better.

Our vision: Whatever the outcome, there is no lack of vision on the part of the sector or on the part of the members of the Historic Wales strategic partnership. We are passionate about the Welsh historic (and natural) environment and aspire to clarity of branding and a better experience for all visitors to Wales. We believe we have world-class visitor attractions that could be on the 'must-see' lists of people travelling to the UK from other parts of the world. We wish to work more closely with other tourism providers so as to offer a rich range of choice and encourage people who come to Wales for one activity, such as a concert or a rugby match, prolong their stay to do something else, such as visiting a castle or museum, or to make frequent return visits.

We want to offer experiential travel – travel that enriches and changes lives. We want our museum and Cadw shops and restaurants to become destinations in their own right – places that people go for Sunday lunch or tea, or to buy presents for family and friends, places that promote the best of Welsh crafts and Welsh food. We want to add value to Cadw membership and to build Cadw's magazine into a broad heritage sector publication that attracts substantial advertising revenue as well as promoting cultural tourism in Wales. We want to build a healthy faith tourism and pilgrimage sector and encourage visits from the millions of people around the world who self-identify as Welsh in origin.

Investment and leadership: Whether this vision can be delivered depends on a number of factors. At present the sector is staffed with people who have curatorial, archival or historic environment expertise. We lack, and need to invest in, people with skills in business planning, fund-raising and sponsorship, travel-trade marketing, catering and retail. Co-operation needs to go beyond the four current participants in the Historic Wales strategic partnership to embrace all those bodies with a stake in Welsh tourism, including Natural Resources Wales, Visit Wales, the National Trust, and the Historic Houses Association. A development budget is essential to support the vision and so is vigorous and inspiring leadership.

Options for Cadw's future: Much will also depend on whether or not a way can be found to enable Cadw to become more commercially agile. Cadw is both an operator of heritage visitor attractions and the state heritage agency. The two functions have been separated out in England to create two new bodies, whereas in Scotland they have been kept in one organisation. Cadw is probably too small to split, and to do so would involve duplication of functions as well as losing the vital synergies that exist between the different parts of the organisation.

We await with interest the results of Kate Clark's report into the options for Cadw, but we believe that keeping Cadw intact would seem to be the best option. That probably means staying close to Government in some form: if so, Cadw needs to be free to be more entrepreneurial and commercial, which means that current constraints on recruitment, procurement, budgeting and succession planning all need to be addressed. More public accountability is also crucial; in former years Cadw published annual reports of its performance. And, amazingly, the public are largely still unaware that Cadw is actually a department of Welsh Government.

Questions about the degree to which the heritage sector is contributing to Welsh Government social objectives:

Delivery of Baroness Andrews' Culture and Poverty report: This is another area in which the sector has no lack of ambition but lacks resources to carry out proven schemes.

Possibly the main lesson that the heritage sector as a whole has learned from the last two years of trying to respond to the Andrews Report is that social services and local authority employees act as gatekeepers to the under-represented groups and hard-to-reach individuals that we could help. These gatekeepers are often sceptical about whether heritage and culture have anything relevant to offer them or their clients. Much work has had to go into winning their hearts and minds over the last three years.

Where we have been able to overcome this hurdle, it is usually because somebody in a local authority has approached a heritage body with a specific idea or proposal that has then been developed and delivered jointly. We struggle to devise relevant projects without their participation, and even when we do work together, you need substantial resources to be able to respond effectively, the outcomes are uncertain and the numbers of people helped can be very small.

In sum, we would like to see:

- raising the priority given to the historic environment in Government planning and reversing the damaging cuts of recent years to enable Cadw, the Royal Commission, the National Museum and National Library to carry out their core functions and make the most of the opportunities presented by the Historic Environment (Wales) Act 2016;

- an Advisory Board established to act as a watchdog on behalf on the Welsh historic environment and to advise the Cabinet Secretary on policy;
- a strategic plan for the historic environment sector in Wales and a more proactive approach to designation;
- addressing the brakes on enterprise that constrain the sector, including annual budgets, and strict government policies on procurement and recruitment;
- investment in succession planning and IT infrastructure;
- investment in tourism, marketing and fundraising skills;
- closer co-operation between the different parts of the cultural tourism sector and a clear focus on improving the experience of visitors to Wales, making our sites, monuments and museums better to visit and more profitable.

Evidence paper for the Culture, Welsh Language & Communications Committee on the Historic Environment

Introduction

The historic environment of Wales makes a vital contribution to our sense of identity and sense of place – and makes an important contribution to our economy and well being.

Wales's historic assets include:

- 3 World Heritage Sites
- 30,000+ listed buildings
- 500 Conservation areas
- 4,100 scheduled monuments
- 6 designated historic wrecks
- 390 registered historic parks and gardens
- 58 registered historic landscapes

Cadw, the Welsh Government's Historic Environment Service, looks after and opens to the public 129 monuments across Wales. Of these, 29 are staffed sites and the remainder are free open-access sites. Cadw's wider role includes the provision of advice and support for the thousands of people and organisations across Wales who live in or care for historic buildings and monuments – the great majority of which are in private ownership. For example, during 2016/17 Cadw considered 1869 consultations and applications relating to designated historic assets.

Cadw also supports Ministers in determining which historic assets warrant statutory protection, and the development and implementation of strategy and policy for the historic environment.

Cadw's future status

Earlier this year, the Cabinet Secretary accepted the recommendations of a steering group set up to review the future of heritage services in Wales: a new Strategic Partnership and the future of Cadw. This included a recommendation to consider options for the future governance arrangements of Cadw, and to test these against

the status quo of retaining Cadw within government. A project board was established with representation across Welsh Government to oversee the delivery of the project and the business case has been developed through a thorough and inclusive process. The advice will be submitted to the Cabinet Secretary shortly before subsequent consideration by Cabinet.

Facilitating collaboration within the sector;

The steering group also recommended greater collaboration between our leading heritage institutions including the establishment of a Strategic Partnership between Cadw, the Royal Commission on the Ancient and Historical Monuments of Wales, the National Library of Wales and Amgueddfa Cymru. This was established in May 2017 and includes participation from TUS colleagues. The partnership provides a real opportunity to bring a sharper focus and clearer identity to the commercial work of our national institutions, especially at a time of pressure on our public finances. It is currently considering development of several initiatives including skills development, commercial, and collaborative delivery of back office functions.

Other collaborations include:

- *Historic environment fora* – Cadw facilitates the Historic Environment Group, the Built Heritage Forum and the Welsh Places of Worship Forum, all of which meet regularly to share information, inform policy and to discuss working together for the future.
- *The Lle Hanes* – in which Cadw and other sector partners collaborate on a shared space at major events such as the National Eisteddfod – working together to co-produce content and a programme of activities/events.
- *Marketing campaigns* – for example the recent collaboration between Cadw and Amgueddfa Cymru – National Museum Wales on a *Dragon vs. Dinosaur* marketing campaign over spring / summer 2016. This included a joint promotional video and social media campaign.

Collaboration with heritage assets in the private sector;

The vast majority of historic assets in Wales are in private ownership. Cadw provides a key role in providing support, advice and mentoring for owners and occupiers – either through direct contact or through the publication of management advice and guidance.

Cadw also works with organisations responsible for privately owned historic assets including the Historic Houses Association and the Country Landowners and Business Association – who are represented on the Historic Environment Group.

An example of the close working between the public and private sector is the Cadw-led Open Doors programme held every September – the largest annual celebration of architecture and heritage to be held in Wales providing free public access to hundreds of historic properties, many of which are in private ownership.

Cadw works closely with Visit Wales to explore new opportunities for promoting the tourism potential of the historic environment. This will also be a key objective of the new historic Wales Strategic Partnership.

Maximising the value of heritage tourism and Cadw's work to meet its income generation targets:

Cadw sites provide income from admissions, retail, membership, corporate hire and other commercial initiatives. 2016/17 saw Cadw's most successful year on record, with 1.4m visitors to staffed sites and £6.6m income received. This is reinvested into the care and protection of the historic environment.

In each of the last three years Cadw income has exceeded ambitious targets (see Annex 1). In exceeding these targets, Cadw has run several successful and award-winning marketing campaigns encouraging visitors to the historic sites in the care of Welsh Government, and delivers ground-breaking events at its sites to attract new and repeat visitors.

For example, the 2016 *Historic Adventures* campaign began with the introduction of a large dragon sculpture at Caerphilly Castle on St David's Day. The campaign exceeded all expectations and targets, generating unprecedented interest and contributing to Cadw's most successful year on record. From the campaign's launch to its end in September there were 728k paying visitors to all Cadw sites (+3.63% YOY) generating £844k income (+71.47 YOY).

The legacy of the dragons continues, with a female and two baby dragons introduced as part of the spring/summer 2017 *Live the Legends* campaign. Results

to date suggest commercial performance and footfall continues to grow, with record numbers attending sites featured on the ‘dragons tour’.

Implementation of the Historic Environment Act

The [Historic Environment \(Wales\) Act 2016](#) received Royal Assent on 21 March 2016, giving Wales the most progressive historic environment legislation in the UK. With the greater part of the Act’s provisions in force, Wales now has:

- **Statutory historic environment records (HERs) for every local authority area**
Maintained by the four Welsh archaeological trusts on behalf of the Welsh Ministers, the records are freely available on the [Archwilio website](#). They provide essential evidence for decisions on the sustainable management of the historic environment and help people engage with their local heritage. They are the first statutory historic environment records in the UK.
- **A statutory list of historic place names**
Another ‘first’ for Wales. Compiled and maintained on behalf of the Welsh Ministers by the Royal Commission on the Ancient and Historical Monuments of Wales, the list is accessible [online](#) or through the historic environment records. It has been well received and will raise awareness of the importance of our historic place names and encourage their continuing use. Statutory guidance directs certain public bodies to take account of the list if naming or renaming properties in the discharge of their functions.
- **More open and accountable systems for the designation of historic assets**
New requirements for formal consultation with owners and occupiers and rights of review have put Wales in the lead amongst the UK nations in making the processes for scheduling a monument or listing a building more transparent and accountable. During the consultation period, an asset receives interim protection as if already designated.
- **New and enhanced arrangements for the protection and management of scheduled monuments**
A greater range of nationally important archaeological sites can now be protected as scheduled monuments. The Act has introduced new measures to halt damage to scheduled monuments and enforce their restoration augmenting existing powers of prosecution. These new measures are supported by the provision of online access to reliable information on the location and extent of

scheduled monuments through [Cof Cymru — National Historic Assets of Wales](#). A simplified scheduled monument consent process for uncontentious works is already saving time for owners and Cadw staff.

- **New and enhanced measures for the protection of listed buildings**

Local authorities have new powers to put an immediate stop to unauthorised works to a listed building. They can also undertake urgent works to halt the deterioration of any listed building, provided that they do not unreasonably interfere with residential use. In a move to reduce the financial risks associated with urgent works, local authorities can make the costs a local land charge, charge interest on outstanding sums and employ a number of mechanisms for recovery.

Four provisions of the Act remain to be commenced:

- **Heritage partnership agreements (Sections 11 and 28)**

These voluntary agreements, which support the consistent long-term management of scheduled monuments and listed buildings, will benefit both owners and consenting authorities by embodying the necessary consents for agreed routine works. Since these agreements will last for a number of years, it is important that the regulations and associated guidance are well-founded and practical. Drawing upon the experience of such agreements in England, we are seeking partners for pilot schemes to inform further progress. The aim is to commence the provisions in 2018.

- **Statutory register of historic parks and gardens in Wales (Section 18)**

The boundaries of 390 parks and gardens on the existing non-statutory register have been reviewed. Before the statutory register is brought into force, all known owners and occupiers of these sites will be notified of the boundaries of the registered areas during the remainder of 2017 and early 2018.

- **Preservation of listed buildings in disrepair (Section 31)**

This provision provides for new regulations to give local authorities additional powers to secure the proper preservation of listed buildings in disrepair. However, the input of stakeholders across the historic environment sector will be needed to shape effective legislation. While deteriorating listed buildings are a cause for concern, new regulations need to be genuinely useful to local authorities and contribute positively to the resolution of the complex challenges

posed by such buildings. Research commissioned to inform proposals for the regulations will be published shortly.

- **Advisory Panel for the Welsh Historic Environment** (Sections 38 and 39)
It would be premature to consider the detailed arrangements for the Advisory Panel until the Cabinet Secretary and Cabinet has concluded the review on the future governance arrangements for Cadw.

From the outset of the legislative process, we recognised that up-to-date planning policy and advice for the historic environment would be needed to reflect and support the provisions of the 2016 Act. We have now published:

- **November 2016** – a revised historic environment chapter for [Planning Policy Wales](#)
- **May 2017** – the first technical advice note for the Welsh historic environment ([TAN 24](#)), which replaced a number of outdated Welsh Office circulars.
- **May 2017** – nine best practice guidance documents for the management of the historic environment. These are available from the [Cadw website](#) and include the management of World Heritage Sites and historic parks and gardens and advice on the preparation of lists of historic assets of special local interest and tackling listed buildings at risk. Further guidance documents are in preparation.

These publications will help local authorities, the third sector, developers and owners and occupiers to manage the historic environment for the benefit of present and future generations.

Protection for listed buildings and scheduled monuments;

During 2016 and 2017, a series of measures have been, or are being, introduced to support the management and protection of listed buildings and scheduled monuments in Wales.

- **The 2016 Act and the newly published TAN 24** – these will strengthen the legal and planning framework for the protection and management of listed buildings in Wales which is provided by the Planning (Listed Buildings and Conservation Areas) Act 1990.
- [Managing Change to Listed Buildings in Wales](#) – this new guidance will help owners and occupiers of listed buildings and their agents understand the implications of owning a listed building and making changes to it. It sets out

the general principles to consider when making changes to listed buildings, and explains the listed building consent process. Local planning authorities have primary responsibility for the administration of the consent process, and the guidance will also inform their decision-making.

- **Heritage Impact Statements** – New regulations came into force on 1 September 2017 to require heritage impact statements for all applications for listed building and conservation area consent. The objective is to protect the heritage values of a historic asset, by requiring a thorough understanding of the impact of a proposed change on its significance. New best-practice guidance has been published, [Heritage Impact Assessment in Wales](#), to help owners, agents and local planning authorities understand why, when and how to undertake a heritage impact assessment and write a heritage impact statement.
- **Historic Assets of special local interest** – While many historic buildings across Wales do not meet the criteria for listing, they still contribute to the identity and distinctiveness of local communities. Cadw has recently published [Managing Lists of Historic Assets of Special Local Interest in Wales](#), which sets out general principles and good practice for preparing and managing lists of local historic assets and provides guidance on their use in the planning system. The guidance aims to encourage local authorities, third sector organisations and owners to work together to protect and enhance historic assets of special local interest and inspire people to care about their local heritage.
- **The protection of scheduled monuments** – the 2016 Act improves on the legislative framework for the protection of ancient monuments, which is provided by the Ancient Monuments and Archaeological Areas Act 1979. The scheduled monument consent process is administered by Cadw on behalf of Welsh Ministers and controls activities to ensure the long term preservation of these national historic sites for the enjoyment and appreciation of present and future generations. Cadw officials also work with owners and local communities to support conservation projects.
- **Properties in the Care of Cadw** – The Ancient Monuments and Archaeological Areas Act 1979 also provides the legal framework for the 129 properties in

the direct care of the Welsh Government, which are managed by Cadw. Of these, 107 are under Guardianship (perpetuity) Agreements. Guardianship places both a statutory duty to maintain the property and powers to do everything necessary for its maintenance, including any archaeological investigation and to remove any part of the property/monument to another place to preserve it. The guardian also has a duty to provide public access and visitor facilities. In compliance with its guardianship duties Cadw has implemented a rolling programme of quinquennial inspections of the historic fabric of all its properties. These have informed prioritised five year programmes of conservation, repair and maintenance work which is being delivered by Cadw's own in-house conservation craft teams or via external contractors.

Protection for buildings and monuments at risk;

Monuments at Risk Survey: Since 1985 Cadw field monument wardens have undertaken a systematic programme of monitoring the condition of scheduled monuments, supported by aerial photographic surveys undertaken by the Royal Commission on the Ancient and Historical Monuments of Wales.

The survey involves the collection of robust evidence that is used to identify the nature and extent of threats and risks and to focus positive conservation work and grants to monuments in most need. It also allows the provision of advice and the development of management agreements with owners.

The condition of listed buildings in Wales: Surveys of the condition of listed buildings have been carried out in Wales for over 15 years and are currently undertaken over a five-year rolling period, surveying approximately 20% of listed buildings stock in Wales per year using a consistent methodology. The latest available data suggests a modest improvement with the number of buildings either 'at risk' or 'vulnerable' falling to 8.54%. The surveys provide local authorities and Cadw with a sound evidence base for strategies to address buildings at risk, and to target any grant-giving programmes.

Tackling buildings at risk requires a proactive and collaborative approach. For example, Cadw is working with other government departments and local authorities in a range of urban regeneration initiatives, and is taking the lead in a [strategic action plan for places of worship](#), many of which face an uncertain future.

Cadw also supports organisations that are directly involved with the management of buildings at risk, such as the Heritage Trust Network, the Architectural Heritage Fund and the Prince's Regeneration Trust.

Where positive support fails, there is a range of statutory measures available to enable local authorities to take remedial action. These measures are outlined in new guidance, [*Managing Listed Buildings at Risk in Wales*](#), which also provides guidance on the identification of problems and their causes, and how to manage them through positive action wherever possible.

Delivery of Baroness Andrews' Culture and Poverty report:

The recommendations in Baroness Andrews' Culture and Poverty report have been progressed through our innovative **Fusion: Creating Opportunities through Culture Programme**. The aim is to eliminate barriers to cultural participation and boost skills, engagement, self-esteem and aspiration, particularly in areas experiencing economic disadvantage. Fusion has enabled a wide range of cultural organisations to contribute to a shared anti-poverty agenda by developing new, exciting opportunities for people living in the most deprived communities in Wales. The evaluation of the Programme has demonstrated that cultural bodies are developing more coherent and collaborative approaches to tackling poverty.

Fusion pilot phase in 2015–17: saw the establishment of an innovative delivery model – the Pioneer Area approach. Ten coalitions of cultural and community organisations across Wales delivered activities including digital heritage programmes, schemes to encourage young people and their families to visit museums, volunteering and work experience, and projects using heritage to encourage healthier lifestyles. During the pilot phase, over 100 partners collaborated to offer opportunities to over 5,000 participants. This included:

- Over 300 people volunteering
- Over 1,500 young people supported to do better at school
- Over 1,250 people supported to love healthier lives and
- Over 100 people gaining a qualification or accredited learning

Fusion 2017–18: Building on the pilot phase, the Programme is now being aligned to wider Welsh Government policy for supporting resilient communities focusing on three themes – employability and skills, supporting the early years, and

supporting health and wellbeing. Current initiatives include the Fusion Challenge Grants Programme launched in March 2017 and transformative programme, *Cultural Ambition*, which will create 33, 12-month training placements in the heritage sector across Wales, targeted at young people who are NEET, particularly from disadvantaged communities.

The Andrew's report has also inspired other initiatives, notably the development of a successful bid to the Heritage Lottery Fund for a major youth-focused community archaeology programme: 'Unloved Heritage'. This will be delivered over the next three years by Cadw in partnership with the Archaeological Trusts and the Royal Commission

Annex 1

Breakdown of Cadw income over the last three years – on each occasion the actual income generated has exceeded ambitious targets

Income Stream	2016-17 target £	2016-17 actuals £	2016- 17 variance %
Admissions	3,647,420	3,712,451	1.78%
Retail	1,696,827	1,916,608	12.95%
Membership	461,000	527,177	14.36%
Commercial Hire	293,000	344,894	17.71%
Estate Income	88,746	86,213	(2.85%)
Other	13,007	16,626	27.83%
TOTAL	6,200,000	6,603,969	6.52%

Income Stream	2015-16 target £	2015-16 actuals £	2015- 16 variance %
Total Admissions	3,170,554	3,437,320	8.41%
Total Retail	1,524,589	1,635,852	7.30%
Total Membership	393,627	438,107	11.30%
Commercial Hire	212,790	175,201	(17.66%)
Estate Income	44,816	72,033	60.73%
Other	15,600	22,299	42.94%
TOTAL	5,361,976	5,780,813	7.81%

Income Stream	2014-15 target £	2014-15 actual £	2014-15 variance %
Total Admissions	2,855,335	3,079,760	7.9%
Total Retail	1,557,254	1,524,589	(2.1%)

Total Membership	386,439	393,682	1.9%
Commercial Hire	149,618	223,910	49.7%
Estate Income	18,500	41,946	126.7%
Other	53,500	14,603	(72.7%)
TOTAL	5,020,647	5,278,490	5.1%