

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 17<sup>th</sup> 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.