

HE 39

Y Pwyllgor Cymunedau, Cydraddoldeb a Llywodraeth Leol

Communities, Equality and Local Government Committee

Bil yr Amgylchedd Hanesyddol (Cymru)/Historic Environment (Wales) Bill

Ymateb gan: Ffederasiwn Eiddo Prydain

Response from: British Property Federation

## **A British Property Federation response to the consultation on the Historic Environment (Wales) Bill**



### **Introduction**

1. The BPF represents companies owning, managing and investing in real estate. This includes a broad range of businesses comprising commercial property owners, the financial institutions and pension funds, corporate landlords and residential landlords, as well as all those professions that support the real estate industry.
2. We welcome the opportunity to respond to the Communities, Equality and Local Government's inquiry into the general principles of the Historic Environment (Wales) Bill. BPF members place significant value on the historic environment. Maintaining historic buildings in economic use, introducing new uses for heritage assets and integrating historic buildings within newer schemes all present opportunities for conservation and enhancement, together with new development, to work together and transform the built environment and public realm for communities.

### **Engagement with owners**

3. We welcome the positive approach taken by the Welsh Government in the Bill, particularly in recognising the importance of heritage to the economy and its role in stimulating urban and rural regeneration.
4. To ensure heritage assets are able to fulfil their potential by stimulating development and economic growth, it is vital that owners and developers are involved in any changes to heritage legislation and policy at an early stage.
5. The proposed introduction of formal consultation with owners of heritage assets will prove useful. We urge that the proposed independent panel to advise on historic environment policy and strategy at a national level involves owners and representatives from the private sector to ensure their voice is heard.
6. The proposal to make it easier for owners or developers to create sustainable new uses for unlisted historic buildings by relaxing the conditions for applications for certificates of immunity from listing is welcome: this is in place in England and would make allow these certificates to be more widely-used.
7. We also welcome the Welsh Government's balanced approach to the proposed introduction of enhanced protection for buildings being considered for statutory listing.
8. The extension of Heritage Partnership Agreements is likely to have a positive impact. Allowing owners of historic assets to negotiate an agreement with

consenting authorities for a period of years will eliminate the need for repeated Listed Building Consent applications for similar works, thereby relieving the pressure on over-stretched local planning authorities and encouraging more consistent and coherent management of the buildings or monuments.

### **Resourcing**

9. It is essential that the public sector is sufficiently well-resourced to implement the new powers proposed in the Bill. Local planning authorities, and the heritage teams within them, have faced severe spending cuts over the last five years and this trend is likely to continue.
10. We welcome the commitment to secure a more stable future for Historic Environment Records, as placing a statutory duty on local planning authorities to maintain Historic Environment Records to defined standards may allow them to be protected.
11. However, there remains a fundamental mismatch between the needs of the system and its resourcing which must be addressed by the Welsh Government.

### **Guidance**

12. It is crucial that those making use of the new powers proposed in the Bill are able to benefit from strong guidance to ensure there are no unintended consequences. The accompanying guidance must emphasise the importance of proportionality when making changes to heritage assets; the impact of viability on schemes; and incorporate the Welsh Government's recognition of the impact of heritage assets on regeneration schemes by integrating the theme of constructive conservation.
13. We would be please to discuss or amplify any points raised in our response.

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