

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.