

Historic Environment Policy Review: response by the Civic Trust for Wales to the consultation document issued in March 2003

The Civic Trust for Wales is a long-established charity that works in partnership with the Civic Trust, Scottish Civic Trust and North-east Civic Trust. It supports an extensive network of voluntary civic societies in communities across Wales. Amongst other initiatives, it works with its partners to organise and promote European Heritage Days in the United Kingdom. It is a member of Europa Nostra. The Trust receives significant support for its work from the Welsh Assembly Government, channelled through Cadw. Its formal mission, shared with its civic societies, is to

- **Promote civic pride as a means to improve the quality of life for all in the places where we live and work, and to**
- **Encourage community action, good design, sustainable development and respect for the built environment amongst people of all ages.**

The Trust is well known for its concern for conservation of the historic environment, pursued within the context of an over-arching engagement with planning policy and access to the planning system, and with quality in urban and architectural design. Consistent with our role and our ethos, we believe that issues to do with the historic environment cannot be divorced from this wider context, nor readily locked in to one portfolio within the government of Wales. However, we consider that the allocation of responsibility for historic environment to the Culture minister creates a context in which a minister as champion can work with colleagues and partners within and beyond government in Wales to ensure that, to quote the review, “conserving, using and facilitating intellectual access to the historic environment in Wales...” is seen as a cross-cutting theme throughout the work of the Assembly and the public bodies it sponsors.

This response reflects the views of the Board of the Trust, and input from the civic society network in Wales.

The context of the Review and our response

The Trust warmly welcomes the Review, and is generally satisfied, even excited, by the document produced so rapidly by the consultants. We believe that it needs to be seen within the context of the imaginative and creative approach that the Welsh Assembly Government (WAG) has taken towards planning and design over the past four years. With limited resources, but a minister for the environment who had a clear vision of what needed to be done, WAG has reformed planning policy, launched the Design Commission for Wales and ensured that the new planning system in Wales will have a distinctively Welsh approach to development planning and inclusion.

Throughout, it has worked with stakeholders in the public, private and voluntary sectors. We believe that this approach should be followed in following through the present Review.

Until recently WAG was clearly lagging behind government in Scotland and England in developing a fresh approach to the historic environment and its relationship to culture, design, education, planning and sustainability. We therefore warmly welcome the publication of the consultation document. Since the inception of the Assembly in 1999 this Trust has argued that a distinctive approach to historic and cultural factors in the environment needs to be embedded in the policy of Welsh government. We have linked this need to the potential to empower people and communities through education in the built environment as a key to civic pride and civic action. We have pointed to the symbiosis between conservation of the historic environment (in the larger sense recognised by the consultants, not simply those discrete buildings and sites that have been given statutory protection), design/urban design, and quality of life. We were to the fore in calling not only for a Design Commission, but also that the Assembly should put forward an effective champion for the historic environment in Wales. We are therefore delighted to recognise some of these arguments within the consultation document, and to find not only that the consultants' proposals are based on a fresh approach to the relationships between landscape, history, people and places, but that they advocate the significance of the historic environment within the wider regeneration and renewal of our cities, towns and communities.

In our response we have focused, quite naturally, on issues of relevance to our role and our mission. We recognise that there are specialist aspects of the document – for example in relation to archaeological recording and information systems – where our silence is probably sensible. However, the Trust is one of a group of Welsh organisations including the National Trust, CPRW and the CBA that has agreed some common principles to be addressed to government. These are reflected in a recent letter to the Culture Minister, Alun Pugh.

In this response we set out, firstly, our broad conclusions and concerns, before looking in more detail at specific aspects of the review document. It should be noted that we met with the consultants who drafted the document, and provided them with access to relevant publications and reports.

Broad conclusions and concerns

- We warmly welcome the review, which expresses the important contribution that the historic environment makes to the cultural, environmental, social and economic well being of Wales. Currently, this contribution lacks effective recognition in the Assembly's matrix of policies and programmes.
- We welcome the fact that the review document recognises the crosscutting nature of the responsibility for management of the various aspects of the historic environment across Assembly portfolios and committees. The proposals and recommendations in the document have significant implications for planning, education, economic development and social policy, and go well beyond the remit of Cadw. It is essential that these be addressed collaboratively, within the Assembly, and

between the Assembly and external partners. No one organisation or government unit can alone deliver a coherent strategy for the historic environment, and it is essential that this crosscutting approach is adopted.

- We are pleased that the review recognises the inextricable link between the natural and the historic environment.
- We commend the advice that the interests and values of the historic environment need to find a new and broader voice as its “champion”.
- We support the need to add “bottom-up” initiatives to the existing “expert” views of some aspects of the historic environment.
- We are pleased that the review recognises the central role of education in all its aspects.
- In most respects, however, the document is an “ideas” piece, and not one that can lead directly in most of its aspects to implementation. Only four specific recommendations are made, and these, while of great significance, remain quite generalised. The next step of the process following the end of the official period of consultation on the document should be the establishment of task and finish groups to examine each aspect of the review in more detail, involving partners and practitioners from the public, private and voluntary sectors. It is within this longer process that the implications for the future of Cadw and the Royal Commission should be considered and taken forward.
- We also consider that the review of heritage protection that has been launched by Westminster government could have significant implications for key aspects of historic environment policy in Wales – in particular the designation and consent régimes relating to historic buildings and conservation areas, and the links between these régimes and aspects of planning policy, development policy and regeneration and development strategies. Thus the next stage in the process, focused around task and finish groups, will need to reflect this changing context and contribute to the formulation of a system of heritage protection appropriate to Wales.

While individual organisations might query points of detail, the consultation document is a worthy follow-up to last year’s Cwmaman conference, and reflects the aspirations that were expressed at that meeting, for example:

- That the historic environment is an “asset for the future” which needs broad definition
- That the historic environment is a key element in the pursuit of social inclusion and sustainability, as well as an economic asset – and that this must be reflected in the Assembly’s sustainable development strategy
- That the historic environment should be central to policy and planning
- That organisational structures need to be fit for purpose and that there are significant opportunities for partnerships
- That the voluntary sector needs support, and that the “bottom-up” approach can make a real difference to communities empowered to take ownership of their heritage and their futures

- That the opportunity to explore and appreciate the historic environment should be incorporated more effectively in programmes for education and lifelong learning.

We note also that there are one or two *lacunae* within what is otherwise a commendable document. The first of these is that while close attention is paid to the work of government and its agencies and to the roles of local authorities and the voluntary sector, little is said about the private sector. Yet it is the private sector that brings forward most development proposals that affect the historic environment. The Assembly has recognised the need to promote good design and to influence private sector clients through the Design Commission. There is a parallel need, surely, to develop an engagement with the private sector with respect to the historic environment. The Design Commission could play a crucial role here. Certainly we need to think beyond the TAN on Design; albeit that this is very positive in recognising the need for design in context, this is a tool that will primarily be used by local authority planners and development control staff. We point elsewhere to the need to think in an holistic way about built environment education; outreach to the private sector should be founded on a similarly holistic approach to design opportunities.

Secondly, we would have liked more attention to be paid to the contribution that the public realm and open and green space play as components within the historic environment. This is implied through the emphasis on places, rather than individual sites and monuments, but needs strengthening in follow-up work to the consultation document. Green space – whether formal parks and gardens, private land, or relict features within townscapes/landscapes – is a key component of the historic environment. Key elements within this green space (not least our parks) have suffered significant environmental deterioration as a result of resource constraint within local authorities, while at the same time there have been some significant voluntary sector initiatives to conserve and manage areas of woodland and open space. The Trust is involved in promoting the Green Flag Award for sustainably managed and publicly accessible green space in Wales. This has been extremely successful in England, and has been taken up as a route to best value by many local authorities. To date, we have had little success in identifying appropriate officials and structures within the Welsh Assembly Government with whom to discuss the development of this initiative, although the Countryside Council has been helpful within its limited resources in enabling the Award to be piloted.

More generally, we feel that connections could be more effectively made to the relationship between urban design, which primarily concerns the public realm, and the wider task of management of the historic environment. Urban design methodologies are holistic in their approach and founded on characterisation. Urban design skills need to be combined with conservation skills, planning skills and interpretation skills in the work, for example, of local authorities. Urban design methodologies have a lot to offer in developing routes to community participation.

Detailed discussion and response

Our detailed comments follow the ordering of the consultation document.

Introduction

The context of the review as set out in para 1 is noted. We note also (Foreword and para 2) that the former Environment Minister commissioned the review and that the outcomes of consultation were intended to be reflected in a policy statement from WAG. Although responsibility for the historic environment has been allocated to the Culture minister, the clear intention was that responses to the review would need to be considered and addressed across the Assembly and ministerial portfolios.

Section 1 The idea of the historic environment

We are impressed by the generalised definition of the historic environment and its interaction with the natural (para 5). This connects well with the discussion of values and significance contained in this section, for example within para 7, where it is argued that the “whole landscape – not just statutory designated parts of it – is an important part of our heritage and a unique source of information about the past, with resonance, meaning and value for the future.” This insight underpins a holistic understanding of the historic environment, as well as the important perception that sustainable management of this heritage should “begin with the general, not the particular.”

It would be possible to sustain an endless academic seminar on the theme of top-down/expert-led values *versus* “bottom-up” or community values (para 8). Both approaches are essential to any system of protection and management, and both sets of values shift and evolve over time. We agree that insofar as formal designations are concerned, the consultants are right in their judgement that there is an imbalance (paras 9-10) in terms of the significance associated with rural and urban areas of Wales. What this points to is, firstly, the need to consider the appropriateness of the current system of recording, designation and protection and, secondly, to think hard about how we assess the character and significance of historic townscapes and connect these assessments with both the planning process and wider community strategies.

Reference to characterisation and the need for this to respond to community values in fact opens up a theoretical and methodological minefield. Cultural values within communities tend to be diverse rather than uniform, and the larger and more differentiated the community, the more complex attitudes and aspirations may in fact be. Landscapes may be defined by human perception, but this implies shifting and subjective judgments, just as expert views change with academic fashions and assumptions about significance. There are no universal truths. Urban designers have used concepts such as legibility to recognise and act on human perception and experience in analysing towns and cities and this approach is just one tool that may be helpful to the recording and the analysis of historic environments and the structuring of dialogue between professionals and citizens in the development of community-owned strategies and management plans.

This “democratisation” of the historic environment (para 11) and the associated methodologies is not, however, simply to be applied to urban areas. We believe that the consultants are also right in pointing to the language of the European Language Convention and its discussion of the relationships between landscapes and cultural values and that there are insights here that need to be embedded into policy within Wales. However, as the development of LANDMAP witnesses, alongside other initiatives including the historic landscapes register, and some of the work on townscape being carried on by the archaeological trusts in Wales, original work is being done in Wales that marries well with this democratisation.

As already suggested, the ethos of *urban design* is one that is based on context and character assessment. Urban design approaches recognise the dynamism of communities, towns and cities; they enable all relevant professional skills to be harnessed to three-dimensional thinking that can produce liveable, vital places in which what we do for the future learns from the past and is respectful of context. Urban design methodologies can help to broker the aspirations of all the participants – public, private and community – in the design and enhancement of places. Techniques such as Placecheck, developed by the Urban Design Alliance, facilitate community participation in this process at a variety of scales.¹ The Trust has been encouraging its civic societies to learn from and practice this kind of approach, through outreach, and through print and online publication. Recent statements on planning policy and the revision of the Technical Advice Note on Design reflect up-to-date thinking on urban design and how it can be applied to land-use, environmental quality, and economic vitality. The Design Commission for Wales is also committed to design quality in everyday places, and is unlikely to focus its efforts solely on *grands projets* in the cities. The judgments it makes and the support it gives to clients and public authorities will necessarily be grounded on approaches that deal with the relationships between old and new, site and context, and (private) social needs and aspirations. The historic environment is not something to be managed in isolation from the process of change and development. See for instance our own work on conservation and urban design in Wales.² The building blocks are therefore in place to develop community-focused approaches to the management of townscape in which the historic environment is not limited to designated sites/buildings or conservation areas. The difficult job will be to cement these blocks together and in the process ensure that communities and individuals can find their voice and be genuine participants and actors in the process.

Section 2 The potential of the historic environment

While succinct this is a useful summary of the economic and social value of the historic environment and its relation to opportunities to pursue social inclusion, community regeneration, and sustainable tourism. Similar conclusions were drawn in the English *Power of place* report and recognised in the government’s response in *Force for the future*.

¹ Robert Cowan (ed), *Placecheck – a user’s guide* (UDA, 2000).

² The Civic Trust for Wales, *Conservation areas in Wales: management and urban design* (2000).

Section 3 Realising the potential

The consultants make only four specific recommendations. In addition, para 71 sets out a proposal for the creation of a new champion for the historic environment. We would in principle support each of the recommendations. Each, however, needs further thought and development through the wider process that we propose below. Otherwise the consultants point to the wide-ranging implications for the Assembly “in embracing a wider definition of the historic environment than the sum of elements designated under heritage legislation” and offer proposals for discussion and action under a number of key headings.

Managing change

A key observation is that in para 25 that

The community, developers, and above all the range of public authorities with the power to impact so heavily on our visual and social environment need to be able (or to be aided) to understand the character of the area in which they intend to intervene and the community values associated with it.

Character analysis, supported by an effective and accessible information base is, we agree, essential if the value of the historic environment is to be properly taken into account in development decisions. This approach also opens the way to a sympathetic approach to new design in the built environment. We believe that the new Design Commission has a key role to play in facilitating good new design within the historic landscapes and townscapes of Wales.

The proposal in para 26 has wide implications for the **planning and development** process. This is just one example within the consultants’ report that demonstrates the need for the next steps to be genuinely crosscutting. Here, it is obvious that the responsibilities of the Culture, Economic Development and Planning ministers overlap. There are implications here, for instance, for the content of *Planning policy Wales* and its related guidance documents. There are clearly opportunities, within the new development planning structure that the Assembly is promoting, for historic environment characterisation to be a key tool within area and neighbourhood planning. There are complex methodological issues associated with this aspect of the proposal, not least relating to the community validation of plans at all levels and to the relationship between evaluation of the historic environment and landscape and townscape values and the wider role of urban design. The proposal also needs to be considered with reference to the heritage protection review process that has been initiated in England and that may lead to primary legislation that covers both England and Wales.

In principle, therefore we support the proposal warmly. If followed through by government, this will be an original and creative initiative on the part of the Assembly, worthy of worldwide attention. As in so much of this consultation document, however, considerable thought needs to be devoted to the idea of what is being proposed before action is feasible.

Information base

The Trust is not well qualified to comment on the detail in this section. Current responsibilities for recording, and opportunities for access, are fragmented. Further thought is required as to structures, and further consideration needs to be given to the proposal that traditional recording programmes need to be reviewed in order to facilitate community management of the historic environment. In principle we support the call for emphasis on area-based characterisation. There is a need to study and develop appropriate methodologies; to explore new ways of enabling access to information (for example through exploiting online access to databases); and to consider the relationship between recording programmes and assessments for land-use planning and urban design purposes.

Community participation

A key role is played by this Trust in supporting an extensive network of voluntary civic societies in Wales. Civic societies are unique organisations in that their mission embraces quality in design, planning and conservation at the local level. They often work closely with other community partners such as local history societies and many have good relationships with local authority planners and conservation staff. They are enthused by civic pride, founded on a sense of place, and a desire to protect and enhance local identity as communities change and evolve. From our position, therefore, we welcome the consultants' emphasis on community participation and endorse their argument that strategies are needed to facilitate local empowerment.

The Trust strongly supports the **Balchder Bro** initiative and has been closely involved with the recent pilot exercise. It believes that the expansion of this programme, should it win Lottery support, could play a significant role in enabling communities and community groups to interpret, manage and promote local identity and distinctiveness. We share the concern that the decision-making process on this kind of initiative can be long-winded.

We agree that the Communities First programme should be redefined to ensure that the historic environment is valued and sustainably managed, and we share the view that the historic environment is often regarded as a minority interest by public bodies. Some local authorities, for instance, seem unable to make the link between the heritage and economic and social regeneration; and where the potential is recognised, resources tend to be lacking to take effective action. Recognition of this potential through a crosscutting Assembly approach to programmes and policies is an essential first step to joined-up thinking and effective direction of funds.

Raising awareness and voluntary action

We are pleased to see our own role and the role of the voluntary network we support recognised in the report. The recommendation in para 37 is couched in very general terms, and its implementation needs further discussion in association with the theme of education and skills. We agree that community strategies offer considerable poten-

tial to harness and direct community participation and strongly support the recommendation at para 40 that the contribution of management of the historic environment to the economic, social and environmental well-being of an area should be taken into account by local authorities within the formulation of their community strategies is timely. How this is to be achieved, however, and how the process of strategy definition should interface with parallel work on economic development strategies or development planning (for example) needs detailed exploration. There is a clear connection here, for example, with the issue of skills and resources gaps within local authorities (para 58), and, the extent to which the value of the historic environment is considered when making planning and land-use decisions.

Education and skills

We strongly support the recommendation in para 45, which once again implies that the review now needs to be followed up through a collaborative approach within the Assembly and through partnerships with external organisations. The consultants are correct in pointing to the neglect of the historic environment in the formal curriculum.

It would be disappointing were the only significant outcome to be the appointment of an education officer within Cadw (possibly accompanied by the diversion of the limited resources within Cadw's budget from another area of activity). Cadw does of course need an education officer, and to be resourced for this provision, but it would be appropriate that this officer's work focus specifically on educational opportunities related to Cadw's management of the estate in care. It would be unfair to expect a postholder to have a wider agenda, or, indeed, the capacity to draw together the wider partnerships that could enrich the school curriculum, let alone focus the development of craft/conservation skills within further or higher education.

Others will respond on the skills and training aspect of this recommendation. Our thoughts here, beyond these initial points, relate primarily to a way forward in relation to formal schooling.

There is a danger in compartmentalising the "natural" and the "historic" environments since, to paraphrase the consultants, the historic dimension of the environment is the sum of the surviving physical changes that people have imposed on the natural landscape. Likewise, we would argue strongly that the "historic environment" should be divorced from the "built environment". This observation is especially relevant to considering how opportunities can be developed within the formal curriculum of schools to enable young people to understand the past and develop as active citizens able to articulate their aspirations for the future of the places where they live, work and play. Initiatives to develop Built Environment Education provide the context for support for cross-curricular initiatives, and opportunities to exploit existing curriculum orders not just for history or geography, but also for mathematics, ICT, art, design and technology.

The Trust's thinking on this issue was outlined in a detailed conference report³ published in 2000, which considered BEE as central to education for sustainability and as an entitlement for all. We argued for an holistic and a cross-curricular approach, within which a practical step would be to identify good practice within schools and facilitate the dissemination of this, linked to an initiative to develop cheap and attractive resources which could be accessed by teachers.

The Trust is well positioned to be a partner in taking forward the consultants' suggestions and recommendations in this area. It is also, through its voluntary network, already actively engaged in providing informal lifelong learning opportunities for adults. Our web site and publications lay a heavy emphasis on providing our network and a much wider audience with the resources to develop understandings of the relationships between the built heritage, conservation, design and development. We provide day-to-day support and advice to the network and other enquirers on these issues, and our outreach programme currently focuses on enabling societies to be effective actors at the community level.

The report recognises our role in managing European Heritage Days in Wales. The Trust is currently consulting on the development of Heritage Days in order to build and strengthen the partnerships that underpin this initiative and to improve the quality of interpretation offered to visitors of all ages. Just what can be achieved is recognised at para 53 in relation to the Open Heritage Weekend organised by the Denbigh THI initiative. We believe that with proper support, and in partnership with local authorities and other players, EHD has the potential to be of significance beyond the formal September event and that it could have a significant contribution to make to school-based education throughout the year. *Force for the future* recognised the potential for EHD in an English context. Meanwhile, in our response to the quinquennial review of Cadw we argued that there was a signal opportunity for government in Wales to engage directly in a European initiative that promotes understanding of the historic environment and its associated forums through seeking direct representation in association with DCMS. We also suggested that Wales could develop closer links with Europa Nostra. We are currently the only Welsh voluntary organisation to participate in this body, but the level of engagement is seriously constrained by our limited resources.

Tourism and Regeneration

The arguments in this section of the report are broadly welcomed, with the caveat that by no means all schemes supported by the WDA have successfully acknowledged the potential for restoration and re-use of the historic environment within area regeneration. This, as with other aspects of the report, is an area for detailed further analysis and review.

³ *Education and the built environment: conference report* (2000). Now online at www.civictrustwales.org/publish.

Local authorities (paras53-58)

Paras 53-58 conclude with the recommendation that local authority capacity building requires support and that this should include the strengthening of their conservation skills as well as the provision of relevant technical advice. Our own report on *Conservation areas in Wales: management and urban design*⁴ contained detailed analysis of weaknesses in resources and skills at the local authority level, as well as discussion of the lack of appropriate technical guidance. We emphasised that effective management of the historic environment through local authority led activities in controlling change, supporting urban regeneration and environmental improvement requires effective team-working and collaboration, involving planners, conservation specialists, urban designers, engineers and others. There is a *massive* skills and resources gap to be addressed, especially within the smaller unitary authorities. It is often in the latter that there is least recognition of the significance of the historic environment to sustainable communities and economic vitality. We note the suggestions in this section for collaboration with English Heritage and Historic Scotland, as well as the comment that Cadw could in the future direct resources to local authorities in a manner analogous to the role played by CCW. Again, we believe that these proposals require fuller discussion and development in a way that engages relevant stakeholders in making detailed recommendations to the Assembly.

The voluntary sector

We are again pleased at the recognition that the Civic Trust makes alongside other organisations to the voluntary sector effort. We have commented elsewhere in this response on how we undertake our role. We believe that it is timely to review the nature of the support that the Assembly provides to the voluntary sector and the way in which the sector interfaces with Assembly officials and ministerial portfolios. While we report to the Assembly through Cadw, via whom we draw down government funding, we also participate in the twice-yearly meetings of the voluntary sector networks with the minister for planning, environment and countryside. We believe there is a need for the Culture minister to be able to engage with ourselves and other partners in a similar fashion and note that initial steps have been taken to facilitate this. However, as well as improving communications between the voluntary sector and government, there is a parallel need for closer joint-working and liaison amongst voluntary sector organisations and networks in order to address both policy issues and practical initiatives. In England, the Heritage Link organisation addresses aspects of this need; in Wales, closer working between ourselves, the National Trust, and the Wales Environment Link, for instance, could be effective.

The historic environment and public policy

The final section of the report focuses on the need for the Assembly to identify a champion for the historic environment, reflected in a unified cultural policy statement and in suggested options for strengthening the machinery of government, to provide “clear leadership and improved co-ordination between (sic) all the players.” This

⁴ November 2000. Accessible via www.civictrustwales.org/publish

Trust made a similar call in its report on conservation areas, and in an earlier report on the Assembly, planning and design (1999). We note that the consultants favour an advisory body to support the Assembly, chaired by a minister. The report goes on, briefly, to consider the financial implications of the changes that it advocates. We support, in principal, the proposal discussed in para 71. We believe that this proposal needs further refinement as part of the follow-up to the report. We would argue also that the resources and skills gaps that recognised in the report need serious address by the Assembly, and that a clearer way forward in regard to resource enhancement and prioritisation will only emerge once the implications of the review are further studied, and the costs of firmer proposals relating to its various proposals and recommendations become more readily apparent. The next steps are therefore critical.

Next steps

In moving forward from this document it is important that policy formulation and practical and organisational initiatives are not seen to lie simply within the “Culture”, and still less within Cadw. There is the opportunity here for the Culture minister and officials to take the lead in developments that to be worthwhile need to be genuinely crosscutting – within and beyond the Assembly.

This consultation document and its outputs need to be viewed as the *beginning* not the end of a process. The consultants have produced an excellent “ideas” document, but their suggestions and recommendations need to be explored within a wider framework of partnership that will help to define the detail of the follow-up with regard to WAG policy and the future of structures and organisations. We believe that the critical next step is to open up the review process to so that the public, voluntary and private (barely mentioned in the report) sectors can help shape developments.

We suggest that it would be helpful to follow a process tried and tested in the context of other recent Assembly initiatives, for example, the formulation of revisions to *Planning policy Wales*.

Task and finish groups should be established to examine each or a combination of the key areas identified in the consultation document. These key areas are:

- Educational and skills
- Information recording and access
- Planning, design and conservation, and the role of local government
- Technical guidance
- Regeneration and economic development, including the role of the WDA
- Tourism, including the role of the WTB and its partners
- Structures for the management of the historic environment
- The role of the voluntary sector

We suggest that the process of discussion be co-ordinated by a steering group charged to report back to the Culture minister and to the Culture committee. The steering group should filter and collate the work of the topic groups. Each topic group should in addition be asked to consider the key issue of the shape of a future Assembly

champion for the historic environment and the formation/structure of an advisory body. This process should also inform the outcomes of the quinquennial reviews of Cadw and the RCAHM, since the broad approach taken by the review document does not address in detail the organisational issues identified through these review.

The follow-up approach outlined here would be able also provide a context within which government and stakeholders can reflect on and influence the outcomes of the heritage protection review that Westminster is promoting, at both the consultation and the White Paper stage. The future shape of the designation and consent regime is of critical importance to the role of Cadw and the relationships between WAG and local government as policies for sustainable development and regeneration mature and as new approaches are evolved for the management of the historic environment. We need to work together in Wales to influence the content of future legislation in order to ensure that this legislation provides the same space for Welsh needs and circumstances as has been achieved in primary legislation affecting education, health and planning.

The advantage of this method of working would be to ensure that discussion and debate engages more than the relatively small and select group of individuals and organisations contacted by the three consultants. It would be able, for example, to draw in more effectively input from the private sector and universities, and establish effective liaison with organisations such as the Countryside Council and the WDA/WTB. It would ensure that the review is founded on effective interfaces within WAG and the Assembly. This kind of process would also have the evident benefit that it would be consistent with the Assembly's values of inclusion, democracy and partnership.

This review creates the opportunity for a genuinely original and creative initiative by the Assembly – the development of a vision of the historic environment and its economic, social and cultural role that is rooted in common Welsh values, perceptions and partnerships. There is a big job to do, but if done well, the Assembly will ensure both that Welsh democracy is further enlarged and that the historic environment will be truly valued and effectively managed within the larger vision of a sustainable Wales.

The Civic Trust for Wales
Ymmdiriedolaeth Ddinesig Cymru

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