

# Consultation Paper on Cadw

## RESPONSE OF THE CIVIC TRUST FOR WALES TO THE QUINQUENNIAL REVIEW OF CADW — WELSH HISTORIC MONUMENTS

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### 1 Introduction

The mission of the Civic Trust for Wales is to promote civic pride as a means to improving 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's role therefore focuses on the pursuit of environmental quality in communities; within this, conservation is an important element and a key component in a sustainable approach to the built environment. As a result we have a keen interest in the policy and practice of conservation in Wales.

We have been strongly supported by Cadw since 1988. Cadw provides core funding to the Trust, chiefly in support of our work with the network of civic societies in Wales. Since 1994, Cadw has also provided resources to enable us to deliver the annual European Heritage Days event in Wales on its behalf.

Our response deals with a number of aspects of the quinquennial review, primarily where our work relates to the Cadw's own role; we have not sought to answer every question in the review brief.

A number of the issues covered by the report have been dealt with in a different way in a report produced jointly by the Trust and the Department of City and Regional Planning at Cardiff University in October 2000. This report, *Conservation areas in Wales: management and urban design*, includes broader reflections on the management of the historic environment.<sup>1</sup> We were grateful to Cadw for its financial support for this study and its publication.

A copy of this report is enclosed with the hard copy of this submission, and attention is drawn in particular to 3.10 and 3.11. Key conclusions are noted in **annex 1** of the present paper.

### 2 A wider context

The future role to be played by Cadw needs to reflect the outcome of a wider discussion within Wales. This discussion should address how the care of the historic built environment responds not only to the need to protect places and sites for their intrinsic worth and interest but to the duty to integrate policy for

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<sup>1</sup> Matthew Griffiths and Sam Romaya, *Conservation areas in Wales: management and urban design* (The Civic Trust for Wales/Department of City and Regional Planning, October 2000)

the historic environment within an overarching agenda for sustainable growth, environmental quality and social inclusion. We note that Assembly Ministers, in jointly commissioning this review, have recognised this opportunity.

We believe that the Assembly should take note of the conclusions of the *Power of place* report produced in December 2000 on behalf of government in England by English Heritage following a wide-ranging consultation. DCMS and DTLR ministers responded formally, and very positively, to *Power of place* on 13 December 2001. Not all the action points endorsed by ministers are necessarily valid in a Welsh context, and it would be quite proper for the Assembly to take a distinctive approach to historic environment policy, as it has in other policy areas. However, the holistic approach taken by the English process has not been emulated in Wales as yet. We would argue very strongly that no final conclusions on the future role of Cadw should be drawn until a body of policy has been developed that places the care of the historic environment within the wider context of the Assembly's guiding themes and values. This, we feel, should be the first priority for government, and the quinquennial review should trigger the process.

**Annex 2** to this response lists some of the action points that government in England has endorsed. One of these, at least, involves the devolved administrations in Wales and Scotland (and Northern Ireland?). Consideration of these action points shows that DCMS/DTLR have addressed historic environment policy in relation to sustainability, social inclusion, lifelong learning, and community regeneration. The relationship between English Heritage and the Heritage Lottery Fund has been opened up for discussion, as have issues of research co-ordination, skills training, and the respective roles of local authorities, agencies, NGOs, quangos, and government itself.

Given the commitment of the NAW to sustainability, and its parallel pursuit of economic and social sustainability, a new focus on education and lifelong learning, and social inclusion, we think it is timely for government in Wales to engage all sectors of the community in Wales, together with relevant agencies and institutions, in a wide-ranging review of current policy and practice.

### **3 The historic environment in Wales**

Wales is endowed with rich historical and natural environments, but it is our perception that we are more conscious as a nation of the latter than the former. While we are expert at maintaining the estate in care — and we value Cadw's role highly in this regard — the wider historic environment is less well appreciated, understood, or managed. This comment relates to structures that have been listed for their special architectural or historic interest; to our record in caring for conservation areas, and to the generality of older structures that may be neither listed nor in conservation areas, but form the essential back cloth to many of our communities, and are key components of their sense of place and social identity. It is probably true that our record compares poorly with that of England or Scotland, and even more so with the best examples of

good practice in conservation, regeneration and sustainability in Western Europe.

Our recent report on conservation area management highlighted aspects of this concern.

For example, local authority officers advanced criticisms of the quality of guidance available in Wales compared with that from English Heritage, and other concerns were raised about the effectiveness of legislation and guidance. There was a general perception that declining resources in terms of staffing and capital made a strategic approach to the enhancement of conservation areas problematic. While this point was made primarily in relation to local authority resources, it was also suggested that Cadw would benefit from better staffing and resources, and that this would help to achieve more effective liaison between Cadw and local planning authorities, and better co-ordination more generally of conservation efforts.

Local authorities also commented that while the duty to designate conservation areas was placed on councils, funding for historic buildings was managed by central government in a way that did not necessarily reflect local needs or priorities. There was a general picture of declining resources available for conservation activities within councils in Wales; resources had been contracting over at least ten years, and the situation had worsened since local government reorganisation as the need to make provision for education and social services had come to dominate local authority budgeting.

The overall picture was that opportunities were being lost to manage, protect and enhance the historic environment in a strategic manner, and in a way that could reflect and engage public aspirations.

Other points made during the research that produced this report may also be relevant to the current review.

For instance, it was suggested that Cadw's focus on individual buildings and sites (inherent in its duties as laid down by government) makes it hard to focus interest or resources on spaces, and on area regeneration. There was a need to review the allocation of resources for the historic environment in Wales, in terms of scale, in terms of priorities, and in terms of the means of distribution. More than one participant in the study suggested that Wales lacks a national vision for its built heritage and that there is a need for government to champion the historic built environment, to promote awareness and understanding, and to relate heritage management to sustainability and inclusion.

These observations support our argument that the quinquennial review is too narrow a process — despite the some of the very broad issues it opens up through its questions — within which to make recommendations regarding Cadw's future role in relation to other actors and agencies. We believe that the issues signalled in Q2 and Q3 need to be addressed through a broader

inquiry into policy for the historic environment in Wales and how this should be developed within the key strategies laid down by the Assembly.

The outcomes of such an inquiry would be the context in which to determine future structures for the protection of the historic environment and the delivery of statutory functions.

#### **4 Cadw's programme and functions**

Pending such a review no decision should be taken on whether it is appropriate to maintain Cadw's functions as they are presently defined, whether they should be broadened, to produce a body more akin in its remit to English Heritage, or whether an innovative approach should be adopted that would wholly restructure the delivery of the statutory and discretionary activities Cadw presently carries out. The Trust would, for example, see benefits in integrating the role and responsibilities of Cadw and the Royal Commission on Ancient and Historic Monuments in Wales; it would also see benefits in giving resources to local authorities in order to devolve aspects of Cadw's role relating to the protection of listed buildings, but these issues need consideration within a broader context.<sup>2</sup>

Cadw has made significant progress against testing targets set for it in relation, for instance, to listed building consents, or the resurvey. No doubt more generous resources from government would help what seems to us to be an underfunded agency. But there is the larger issue to be considered of whether such resources should be given to Cadw as currently structured, or whether there should be a fresh approach to the management of the historic environment.

Paragraph 3.8 of the Consultation Paper refers to Cadw's role in grantmaking to assist repairs and to town schemes. We have high regard for the impact that town schemes have had in Wales and for the way in which Cadw has supported and encouraged their development. Recently, there have been changes of approach that have encouraged local authorities to prepare conservation plans and delivery strategies as a basis for future town schemes. This initiative suggests that there would be benefits now in reviewing the overall effectiveness of town schemes themselves, both in terms of intrinsic conservation, and in terms of the relationship between investments in historic buildings and wider renewal strategies.

We note that the ministerial response to *Power of place* has been to recognise the importance of integrating approaches to the historic environment within neighbourhood and community strategies, and to accept the research that points to the economic and social leverage that positive approaches to the built heritage can have within regeneration initiatives.

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<sup>2</sup> In the Netherlands, for instance, management of the historic environment is largely devolved to municipalities.

It is in this context that that suggestions that Cadw's duties force it to focus primarily on individual sites and buildings at the expense of area strategies, seem relevant. However, (Q6) the discontinuance of Cadw's functions would be a disaster in a nation that is neither very effective in protecting the historic built environment nor in encouraging its citizens to recognise its significance and economic and social value.

Cadw's successes are significant. We would highlight, while not downplaying its other achievements:

- Its record of conservation of the estate in care
- Successes in relation to targets relating to listing and scheduling, and to consent cases
- The quality of interpretation and presentation offered to visitors to its sites
- Increasing visitor market share
- Producing the Landscapes Register and related documentation
- Within its capacity, contributing to regeneration activity...

However, these achievements should not minimise the potential to build on this record, whether through Cadw or by other means.

For example, one area of concern to us is our ability, collectively within Wales, to assess the extent to which historic buildings are at risk. One of the successes of English Heritage has been to accomplish a national audit of the risks to listed buildings and to quantify the investment that would be required to safeguard such structures. Understanding the degree and patterns of risk in relation to different types of structure across Wales would enable a strategy to be developed to address the threat to historic buildings and thereby to contribute more effectively to the sustainable re-use and repair of such structures.<sup>3</sup>

In Wales, Cadw has offered advice and financial support to enable local authorities to develop their own buildings at risk registers. It is our impression that the record of achievement is patchy at the local level, and that despite the significant work undertaken by individual authorities, we are handicapped as a nation by the lack of an all-Wales register to guide and inform public policy.

There is also greater potential to widen public awareness and improve access to the historic environment. The quality of Cadw's interpretation of the estate in care to visitors is unchallengable, combining scholarship and accessibility within well-designed brochures and other media. Cadw has also made a contribution to a wider approach to access through its support for European Heritage Days in Wales, channelled through the Civic Trust. But there is a wider agenda of education about the historic environment, linked to social inclusion, that Cadw is not resourced or charged to address, as well as a need to develop an all-Wales information strategy that would assist professionals and decision makers, on the one hand, and provide access to learners and

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<sup>3</sup> Historic Scotland has provided significant support to the Civic Trust to maintain a register of buildings at risk that contributes to such an objective.

the public at large. Aspects of this need could be addressed by extending Cadw's responsibility and providing resources to the education function accordingly, but this would not be the only way in which to address this objective.

Likewise, there is a wider agenda for government to examine the contribution of the voluntary sector to the understanding and the care of the historic environment, and how support for this effort could be developed. Linked to this, an overarching review of historic environment policy might consider voluntary sector relationships with Cadw, other agencies, and the local authorities.

With specific regard to Cadw, we would argue that where it has in the past been criticized, with respect to alleged delay in decision-making, or lack of clarity in the assessment of grant applications, much progress has been made. Moreover, the difficulties experienced can often be related to levels of staffing and resources, rather than to efficiency, and sometimes to the way in which its roles have been defined.

## **5 Partnership**

We focus here, in the main, on our own partnership with Cadw.

The Trust has enjoyed an effective working relationship with Cadw since 1988, and with successive ministers who have had oversight of Cadw's work. This dialogue has developed and grown since the inception of the National Assembly. Cadw provides core funding to the Trust, primarily in respect of our support for civic societies in Wales. Cadw has maintained this support at a time when the Trust, like many charities, has found private sector funding hard to access. Since July 2001, Cadw has been considering whether aspects of the Trust's role could more appropriately be supported by other departments within the Assembly. This is an acknowledgement that while the Trust is concerned with conservation issues, its mission is broader, and that conservation is seen by us as an aspect of a wider remit for quality in urban and architectural design, effective planning and community engagement in planning, and the education of the public at large. The civic societies whom we support can be shown, very often, to interpret the protection of historic buildings as part of their own broader concern for environmental quality, and as a consequence they frequently address wider issues of land use, transportation, access and regeneration. Collectively, they are a unique resource within the voluntary sector.

In the future we would look forward to a relationship with Cadw and the Assembly where:

- Assembly support for our organization is consistent with the Assembly's general policy for its relationship with voluntary sector bodies— in terms of decisions on the services we should provide in return for Assembly support, and of the timing of decisions on grant— enabling us to plan

effectively ahead of each financial year in the context of a strategic approach to our role and its development

- Support for our role is channeled through Cadw, where this is appropriate, and through other divisions in the Assembly where our role is recognized and supported.

We enjoy tremendous support from Cadw as an organisation and considerable good will from its staff; however, we have become increasingly concerned about the timing of grant decisions and the process of dialogue that leads up to these. Grant for the current FY was not determined until last July, and we remain uncertain both about the level and the structuring of future financial support, while appreciative of Cadw's positive approach to our role and needs. In part we would attribute these logistical issues to the limited resources available to Cadw and to the issues raised by our unique position as a voluntary body supported which Cadw supports through core funding.

We would also like to draw attention to the positive way in which Cadw has developed its Civic Initiatives (Heritage) Grant as a means to fund projects promoted by civic societies and others. While small in scale, this grant has been deployed effectively to support projects of considerable local significance in a field where it has often been difficult to unlock other resources.

We are also a partner with Cadw in the promotion of European Heritage Days. We are currently seeking clarification from Cadw as to whether we carry out this role on its behalf, and therefore on behalf of the Assembly — our understanding since we were asked in 1994 to develop the EHD in Wales — or whether this should now be construed as a programme we undertake at our own behest and for which we apply to Cadw, *inter alia*, for support.

The EHD are Europe's largest festival of the built and historic environment, promoting free public access to sites and buildings of historic, social and architectural interest during weekends in September in over 47 countries associated with the Council of Europe. Cadw provides financial support to the Trust to develop and promote an EHD programme in Wales and in September 2001 we enabled access to over 130 sites throughout Wales on three September weekends in partnership with a variety of owners and organisations. We believe that these events may have attracted a total of over 30,000 visitors. The sum available for the 2001 EHD in Wales was determined in mid July. We believe that there is potential to develop and expand the EHD in Wales (and to review whether it should focus on a particular theme each year, or simply attempt to open up the greatest number and the widest range of sites that is practical), and to consider how its largely unlocked educational potential can be built on. Before this is possible, however, we need clarity on

- The ownership of the event — with the Assembly/Cadw or with ourselves as a direct partner with Europe
- The level of funding to be anticipated in the future from Cadw/NAW and our freedom to explore support from other sources — government, the private sector, charitable trusts, the HLF

- The timing of decisions on the level of funding so that we can plan strategically for the development of the EHD

Currently the figure allocated by Cadw does not enable us to staff the development of the event as an addition to our heavily committed staff of 1.5 FTE. However, we recognise resource constraint within Cadw as a factor in affecting both our core funding and the level of support for the EHD.

## **6 Beyond Wales**

Cadw's support for the European Heritage Days initiative prompts a further thought. Currently, the NAW is technically represented by DCMS at the Council of Europe and at the annual European co-ordination meeting that advises the Council on the development of Heritage Days. Government in Wales has no direct access to European forums. We have felt for some time that it would be beneficial to the Assembly and for the Scottish Executive to be represented directly at this level, in partnership with DCMS, not least because the Heritage Days programmes in the home countries are distinctive in organisation, scale and character. We believe in any case, that Wales, through the Assembly, should have its place in European institutions that consider heritage and historic environment issues. It would be appropriate in the future for representatives of Cadw and Historic Scotland to be funded to attend European EHD meetings alongside DCMS. We would also welcome support from the Assembly and Cadw for Europa Nostra. We are the only Welsh voluntary organisation to be a member of this EU-supported body, and it would be beneficial to Welsh policy-making were direct participation by Cadw and/or ourselves to be facilitated.

We accept that relationships between the Assembly and bodies external to the UK are for UK government to determine. However, it seems to us to be a positive development in the light of the above considerations that UK ministers have committed DCMS to work with the devolved administrations to ensure that, where appropriate, the UK's interests in international fora are properly recognised.

## **7 Cadw within the National Assembly**

Q27-9 prompt us to conclude by returning to the argument advanced in section 2 above. We do not think that Cadw's aims and objectives, deriving as they do from a reorganisation of monuments administration in the early 1980s, readily reflect the guiding themes and values of the Assembly. However, the extent to which Cadw might change or develop as an organisation, and the way in which its aims and objectives might be recast, require a process of consideration that goes beyond the quinquennial review. In other words, there is a prior need to review policy for the historic environment as a whole, and within this to consider the respective roles of government, local authorities, agencies and the voluntary sector, so that the themes and values of the Assembly can be addressed collectively and with confidence.

In the shorter term, there is a need to consider the relationship between the Design Commission that is to be established as an Assembly-owned company and Cadw. Management of the historic environment is clearly central to design issues, whether at a national or local level. There are issues relating to skills development, professional training, and CPD which would benefit from exploration and a definition of roles; more broadly, both Cadw and the Commission are potential vehicles, amongst others, for the development of historic environment education within a wider context of built environment education. CABI, the model for the Commission, is attaching a growing priority to education, and has been supported by ministers in this area of activity. In a different context, CABI has also been asked to contribute views on the listing of post-war buildings — there has been relatively little attention to the listing of modern structures in Wales.

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for The Civic Trust for Wales  
4 January 2002

## **Annex 1: Conservation Area management in Wales: selected conclusions (October 2000)**

- The current position with regard to the strategic management of conservation areas is mixed and patchy
- There has been a contraction in regular resources for proactive conservation activity, and this contraction is not addressed by occasional investments secured through other strategies
- Some authorities lack specialists; others find it difficult to integrate the work of their conservation professionals within a corporate approach to the built environment
- Professionals remain dissatisfied with the framework of legislation and guidance, and compare the range of advice available from official bodies in Wales unfavourably with the English Heritage product
- Resource constraint affects not simply management activity, but, crucially, also impacts on the engagement of public understanding and support.
- The preservation and enhancement of conservation areas should be regarded as central to the issue of quality in town and country... local and national government need to consider jointly how this aspiration can become a reality...
- ...A methodology should be adopted that enables inputs into conservation work to be measured more effectively against outputs, in physical terms, and in relation to social and economic sustainability criteria. Conservation in this sense needs to be appreciated as central to broader urban design and urban regeneration strategies.
- The Assembly should review the allocation of central government funds for conservation activities; consider how far there should be greater involvement for local authorities in determining the deployment of such resources; and examine how far such central funding can be allocated to area-based strategies rather than single-site projects...
- There is the potential for the Assembly to evolve as a champion for the built environment in Wales, with support for environmental education and promotion of the built heritage as key components of vibrant and sustainable future communities.

**Annex 2: A selection of the action points endorsed by DCMS and DTLR in *The historic environment: a force for our future* (December 2001)**

- DCMS/DTLR/DEFRA discussions about the strategic direction of English Heritage and the Heritage Lottery Fund
- DCMS to work with the devolved administrations to ensure that, where appropriate, the UK's interests in international fora are properly recognised.
- Government to look to local authorities to adopt a positive approach to management of the historic environment and its condition; urges them to appoint champions for the historic environment within their management structures and to ensure that elected members have access to training in respect of the historic environment...
- Government to examine the role and functions of English Heritage within its quinquennial review (Comment conclusions that could be relevant to future thoughts on the shape/role of Cadw)
- Government has commissioned English Heritage to develop a five-year strategy for the development of effective working relationships both within the Historic Environment sector and with other relevant interests
- Government has asked English Heritage to produce a pilot (state of the) Historic Environment report during 2002 (Comment This could usefully be emulated in Wales, but certain relevant indicators, for example with relation to buildings at risk, would be absent)
- Government has commissioned English Heritage to frame a co-ordinated approach to research across the Historic Environment sector...(Comment there seems to be no co-ordinated research strategy in Wales)
- Consultation on range of options for enhancing Sites and Monuments Records
- Government to work with English Heritage and the Learning and Skills Council to increase opportunities for those who want to take their interest in the Historic Environment further...
- Government to explore with English Heritage whether Heritage Open Days should become an annual Historic Environment Week (Comment HODs are the English variant of European Heritage Days)
- Government to consider how to encourage children to visit national museums and galleries and provide free access to the entire Historic Environment sector

- English Heritage to work with Culture Online to explore the potential of e-learning (Comment The potential to develop built environment education and historic environment education in Wales, either through traditional media or through e-learning, remains unexplored)
- English Heritage to work with partners to develop the place of education within the Historic Environment sector and government to propose targets for increased activity in this area in English Heritage's funding agreement (Comment There is surely a place to develop an educational role for Cadw, but within a wider learning strategy?)
- Government to publish new policy document on social inclusion policy for the built and Historic Environment and convene major associated conference on the role the Historic Environment can play in combating social exclusion (Comment an issue not yet addressed in Wales)
- Encouragement to operators of local information websites to develop opportunities for disseminating intelligence about the historic environment
- Government to work with CABI to explore ways in which best practice models of engaging people and communities in issues relating to the local built environment might be addressed (Comment Would the Welsh Design Commission be able also to work in this way?)
- Government review of integration of heritage controls into a single planning regime (Comment Obvious future implications for Wales and Welsh agencies)
- Government wishes to ensure that local policy making on the historic environment takes proper account of the value a community places on particular aspects of its immediate environment. The government commends character assessment to local authorities as a useful tool... and as a way of encouraging greater involvement by local communities in conservation issues. (Comment Very wise, but not without resource and skills implications)
- The State of the Historic Environment report will provide an analysis of the pressures facing the historic environment, as well as its contribution to tourism and economic regeneration. (Comment How practical would this exercise be in Wales?)
- The government encourages local authorities and local strategic partnerships in preparing their community strategies, to consider the role of the Historic Environment in promoting economic, employment and educational opportunities within the locality... (Comment A similar commitment in Wales would be welcome, but would have resource implications for councils and their partners)

