

## 2 Survey design

The aim of the study, conceived as the first phase in a longer investigation, was to explore the context in which planning authorities and their conservation staff operate; to look at the process of review and the outcome of conservation area reviews; to examine the nature and form of the policies developed to promote conservation; and to ask questions about the way authorities implement their policies, the tools they deploy, and the funding that is sought and allocated.

It would look, too, at how far there were perceived linkages between policy and sustainability as a fundamental criterion in the evaluation process.

The work was based on a questionnaire survey mailed in July 1999 to all 25 of the authorities with responsibility for conservation areas in Wales (the unitary authorities plus the three National Parks). Only two authorities failed to respond.<sup>1</sup> The majority of respondents offered detailed information quickly (by and large) and often under pressure from other demands on their time. The questionnaire sought information under the following heads:

- **Context:** human resources, specialisms, liaison, numbers of conservation areas managed, patterns of designation.
- **Review:** process and frequency of review, content of review, outcomes
- **Policies:** content of conservation policies, documentation
- **Implementation** tools, financial resources, relationship to sustainability objectives.

### 2.1 Quantitative and qualitative data

This mainly quantitative data was to be supplemented by the comments sought relating to qualitative questions. This aspect of the study was focused on perceptions of the effectiveness of government legislation and guidance; specific issues confronted in designating and managing conservation areas at the local level; and attitudes to funding, design and community engagement. Many authorities went out of their way to be helpful and thorough in supplying quantitative information; and helpful and sometimes robust responses were received from a significant number of respondents to the qualitative survey.

Data analysis related to different aspects of the study, from establishing factual information about conservation areas and LPAs, such as numbers of staff, or the number, size and nature of the conservation areas within an authority, to eliciting information and views that relate to policy formulation.

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<sup>1</sup> Carmarthenshire County Council and Brecon Beacons National Park

## 3 Findings

The unitary authorities vary considerably in their physical structure as well as spatial distribution. They range from predominantly urban centres such as Cardiff and Swansea to the National Parks. Others, for example the Vale of Glamorgan, combine urban and rural characteristics. In analysing the questionnaire responses it is therefore necessary to bear in mind the need to compare like with like — for instance when comparing the staffing of LPAs, or the particular policy issues which LPAs identify as significant.

### 3.1 The 1990 study

In 1990 the Civic Trust for Wales carried out a modest research exercise in which an attempt was made to assess the impact of the Civic Amenities Act on Wales. At that date there were 362 conservation areas in Wales, but it was clear that sometimes designation amounted to very little. What mattered was whether designation was followed by action based on the obligation to plan positively for a conservation area's future well being. Earlier research (notably by English Heritage) had concluded that there was considerable local variation both in the readiness of LPAs to designate conservation areas, in the first place, and then to be proactive about the management of these assets.<sup>1</sup> The sample study found that

- Authorities varied considerably in terms of their commitment to the designation process;
- Authorities often perceived themselves to be severely constrained in the resources that they could allocate to conservation area enhancement;
- The local plan was the main vehicle for the setting out of conservation area policy, but there was a considerable variation in terms of approach and level of detail from one plan to another in Wales
- Only six out of the sample of 22 authorities had adopted article 4 directions, and there was a concern that the whole process was too cumbersome to be worthwhile.

- Only four of the 22 councils operated conservation area advisory groups that enabled people drawn from the community to have an input into the decision-making process

This analysis provides a rough and ready baseline for the present study in the context of conservation area management.

### 3.2 Designation and appraisal

There are now 502 conservation areas in Wales (31 October 1999 figures). The number per authority is shown in table 1. The pattern by which Welsh conservation areas have been designated in the three decades since the 1967 Act is revealed in table 2. This shows that the peak decade for designations was the 1970s; there were 95 designations in the 1980s and a further 122 in the 1990s. One extreme is represented by Blaenau Gwent, with one conservation area; the other is that of Powys (the largest authority in surface area) with 54 designated conservation areas. Many of these are designations made in the 1990s by the former Montgomery District Council. The mean number of conservation areas per authority is twenty, but this does not reveal the true situation, since factors affecting the historic pattern of designation appear to include the size of an authority, its rurality, whether or not it covers a former industrial area, whether or not it is large and urban (Cardiff, Newport), whether or not, as in the Vale of Glamorgan, there is an historic nucleated settlement pattern. There is also evidence that some of the pre-1996 authorities were simply less interested than others in conservation areas *per se*.

Anglesey	11	Neath Port Talbot
Blaenau Gwent	1	Newport
Brecon Beacons	5	Pembrokeshire
Bridgend	16	Pembrokeshire Coast NP
Caerphilly	14	Powys (Brecks)
Cardiff	26	Powys (Mont)
Carmarthenshire	27	Powys (Rads)
Ceredigion	13	Rhondda Cynon Taff
Conwy	25	Snowdonia NP
Denbighshire	34	Swansea
Flintshire	32	Torfaen
Gwynedd	37	Vale of Glamorgan
Merthyr Tydfil	3	Wrexham
Monmouthshire	30	

**Table 1**  
Conservation areas by local planning authority, October 1999

In some cases lack of interest in the early years of designation seems to have been followed by a catching up exercise. In others (the Vale of Glamorgan, for example) designation seems to have reached saturation point early on. Eight authorities in the sample have designated conservation areas since local government reorganisation in 1996, amongst which Pembrokeshire Coast National Park and Monmouthshire stand

Authorities	1960s	1970s	1980s	1990s	n.k.	Total
Blaenau Gwent Borough Council	0	0	1	0		1
Brecon Beacons NP	3	1	0	1		5
Bridgend	0	13	3	0	0	16
<b>Cardiff</b>	<b>1</b>	<b>14</b>	<b>5</b>	<b>5</b>		<b>25</b>
Carmarthenshire	0	6	2	19		27
Caerphilly	0	6	1	6	1	14
Ceredigion	0	0	0	0	13	13
<b>Conwy County Borough Council</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>23</b>
Denbighshire County Council	0	15	11	8		34
Flintshire County Council	0	6	21	5		32
Gwynedd Council	2	19	17	2		40
<b>Isle of Anglesey County Council</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>3</b>		<b>11</b>
Merthyr Tydfil	0	2	0	1		3
Monmouthshire County Council	0	22	0	8		30
Neath & Port Talbot County Borough Council	0	0	4	2		6
<b>Newport County Borough Council</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>13</b>
Pembrokeshire Coast National Park	0	1	1	13		15
Pembrokeshire County Council	1	15	4	3		23
Powys County Council	0	11	16	27		54
<b>Rhondda Cynon Taff</b>	<b>0</b>	<b>10</b>	<b>2</b>	<b>4</b>		<b>16</b>
Snowdonia National Park	0	12	1	1		14
Swansea	3	19	1	8		31
Torfaen County Borough Council	0	0	5	0		5
<b>Vale of Glamorgan</b>	<b>0</b>	<b>35</b>	<b>0</b>	<b>3</b>		<b>38</b>
Wrexham County Borough Council	0	17	0	3		20
<b>Totals</b>	<b>11</b>	<b>231</b>	<b>95</b>	<b>122</b>	<b>50</b>	<b>509</b>

**Table 2:** Conservation area designations by decade

out for their activity rate. All the PCNP areas (there are thirteen) are post 1996; as are seven out of the thirty areas in Monmouthshire.

Seventeen authorities have undertaken a programme of *appraisal* since 1996. This activity is not necessarily related to the number of conservation areas an authority manages. All the 34 conservation areas in Denbighshire have been appraised recently, as have all six in Neath-Port Talbot. Flintshire has appraised fourteen of its 32 areas. In Monmouthshire (where designation has been active), only one out of 30 has been appraised, while in Gwynedd none of the 40 areas has been appraised, and in Cardiff one has been appraised out of 25 (appendix 1, table 8).

The questionnaire asked respondents to comment on the frequency and context within which they review and appraise their conservation areas (appendix 1, table 9). Eight authorities stated baldly that this was an activity that could be carried out only when time and money were available. Three stated that it was an activity carried out “when necessary”. Two authorities — (Gwynedd and Pembrokeshire County Council) have established a rolling programme of review, while others relate review to plan preparation (sometimes qualifying this by the availability of time and money or by the matter becoming necessary). There is no consistency here, apart from the obvious fact that for most respondents, scarcity of resources limits the activity they can carry out. This is an important observation given the obligations in the act and the need for development plans to establish criteria for the designation of new conservation areas, review existing boundaries, and control the demolition, alteration or extension of listed buildings. Development plans need to include firm conservation area policies based on a clear definition of the special architectural or historic interest that underlies the justification of designation. English Heritage has drawn atten-

tion to the significance of written appraisals of character and appearance as a basis of development plan policies and control decisions.<sup>2</sup>

### 3.3 Staffing

The questionnaire sought to establish the level of expertise available to planning authorities and to gauge how far this was organised in specific conservation teams. Information was gathered both on the nature of the professional skills employed within authorities and on the relationship between staff with responsibility for conservation and other colleagues. Overall the pattern of human resourcing seems patchy and under strength for the task in hand.

Specialists	Architects	Urban designers	Planners	Conservation-trained staff
None	10 authorities	10 authorities	4 authorities	8 authorities
0.3 people			1 authority	
0.5 people		1 authority	3 authorities	4 authorities
1 person	7 authorities	3 authorities	7 authorities	5 authorities
2 people	1 authority	1 authority	5 authorities	3 authorities
3 people		1 authority		
4 people			1 authority	
5 people			1 authority	

**Table 3:** Expertise available to local planning authorities

Table 3 gives an overall view of the range of specialisms available to planning authorities. For example, seven authorities employ architects on conservation area work; six can draw on the services of urban designers; seventeen deploy planners and eleven specified that they had staff with specific training in conservation. The negative view of this evidence is represented by the statistics that eight authorities had no conservation-trained staff working on conservation areas; four authorities allocated no planners to this work; and only seven authorities used staff with architectural training. Overall, planners dominate teams, but they do not necessarily specialise in conservation.

The precise mix of specialisms demands a closer look, as does the size of team in relation to the number of conservation areas that an authority manages. Powys, the largest unitary authority by area, with the largest number of conservation areas, and a history of recent designation activity, has no designated team of conservation staff. Torfaen, with five conservation areas, possesses “no specific conservation expertise” and generic planners handle the job. Rhondda Cynon Taff has “no conservation team.” Caerphilly has “no team” but one qualified conservation officer. Monmouthshire (with thirty conservation areas) employs a conservation officer who can seek advice from development control and development plans colleagues. At the other end of a short scale lies Cardiff, where two architects, five urban designers and three planners (amongst whom are two conservation specialists) work within an urban design group; and Wrexham, with a team of “four” — two planners, one urban designer, and 1.5 technicians, including one conservation-trained specialist.

### 3.4 Liaison

With the constraints on planning departments (or the entities into which they have been assimilated given a recent pattern of corporate restructuring within local authorities) it might seem that few conservation staff could work in isolation from development control, development planning or special project work. However, (Appendix 1, table 6) seven respondents thought their conservation staff liaised only “occasionally” with other teams within the authority, and one respondent suggested this “never” happened. In fourteen cases the liaison was “frequent”. Nine authorities noted frequent or occasional liaison with conservation area advisory committees, and thirteen authorities “never” do so. One authority did not answer this question. Interest in such committees does not seem to have grown by very much since the Civic Trust’s 1990 study found that only four of the 23 authorities sampled made use of this procedure to involve the public in their conservation work.

On the other hand most authorities found that their work involves frequent (fourteen cases) or occasional (eight cases) contact with Cadw. Other comments about the interface with Cadw were made in the context of the September seminar; these are considered below, when issues relating to legislation and guidance are considered. The record of this seminar is given at appendix 2.

### 3.5 Funding

Appendix 1, table 18 summarises the survey data relating to funding of conservation area enhancement work. Not every authority was able to supply comparable information, and further investigation may be useful to break down more accurately the categories applied. “Other” funding, however, generally related to investment secured via Heritage Lottery funding, European and WDA regeneration funding. Central government money equates generally to programmes such as Town Schemes (and it is this that has generally levered out private sector contributions).

The figures indicate that over the past three years there has been a considerable variation in the scale of investment in conservation area enhancement activity from authority to authority. Where very large sums have been expended, in Conwy, Newport, Swansea or Rhondda Cynon Taff, for instance, this has been generally a by-product of broader projects, where authorities have been successful in obtaining major regeneration and tourism funding. Bridgend could identify no funds earmarked specifically for conservation area work in the past three years but noted that £1M had been spent on pedestrianisation works in two conservation areas as part of a separate initiative. What stands out equally dramatically is the fact that several authorities have either identified no internal funds for enhancement work, or in other cases the budgets are very small compared to the responsibility they have inherited. This seems to be especially the case with regard to Snowdonia National Park, Monmouthshire County Council, Pembrokeshire County Council, Swansea and the Vale of Glamorgan Councils.

The picture these statistics draw may be a little misleading, since councils clearly spend cash within conservation areas other than that earmarked for enhancement proposals or obtained via special projects. Investment might be expected, for instance, through a highways budget, or via the housing department. It has been pointed out (in the course of the seminar) that the definition of “specific” funding depends very much on how one defines conservation. In Cardiff there is no longer a specific conservation areas budget and funding is sought from other strategies. The question remains as to whether such funds are spent positively, bringing benefits in conservation terms. It has been argued that in some cases the deployment of housing renewal money can work contrary to conservation interests, with different criteria being adopted by housing departments from those that would be acceptable to conservation staff. Several participants in the seminar emphasised the need for funding that is specifically earmarked for management and enhancement programmes if conservation area management is to be effectively targeted and become proactive rather than reactive as is frequently the case at present.

Such comments, taken together with information collected on the relationships between conservation teams and other disciplines within local authorities, emphasise the need to consider the relationships amongst professionals within management structures, and perhaps especially the degree to which there is joint working between conservationists and urban designers to aid funding allocations and to integrate programmes. The relationship between conservation and urban design specialists is considered further below.

### 3.6 Conservation area reviews: content and outcomes

Table 4 gives an analysis of the content of conservation area reviews. It suggests that the review of the suitability of buildings for listing within conservation areas is quite rare and that most authorities continue to rely on the survey work organised by Cadw to ensure that the list is up to date. All but one authority, however, undertook character appraisals, within which they identified and/or assessed the quality and significance of landmark features and vistas. In this sense, although the quality of reviews has not been considered, the majority of respondents recognise the significance that section 54A attaches to appraisal, as a basis for policy-making, enhancement proposals, and development control work.

Table 5 analyses the activities that authorities identified as the outcome of appraisals. A number of points stand out:

- Enhancement schemes are an outcome of appraisals in fourteen out of 23 authorities (only four authorities stated that they are a frequent outcome — Caerphilly, Denbighshire, Pembrokeshire and Torfaen). This should be noted in the context of the statutory obligation to bring forward from time to time proposals for the preservation or enhancement of a conservation area.

	Frequently	Occasionally	Never	Missing	Total
Character appraisals	15	7	1	0	23
ID / assessment of landmark features and vistas	14	7	2	0	23
Review of listing	3	6	13	1	23

Table 4: Outcomes of conservation area reviews

	Frequently	Occasionally	Never	Missing	Total
Enhancement Schemes	4	10	3	6	23
Article 4 Directions	3	6	6	8	23
Guidance	5	7	2	9	23
Policy Revision	3	9	3	8	23
Boundary Review (no alteration)	4	7	5	7	23
Boundary Review (extension)	4	8	4	7	23
Boundary Review (reduction)	2	5	9	7	23
De-designation	0	2	14	7	23

Table 5: Outcomes of conservation area reviews

- Frequency would appear to be related to the capacity to undertake review, as well as to the number of conservation areas for which an authority has responsibility.
- Planning authorities remain sceptical about the efficacy of article 4 directions, with only Cardiff, Denbighshire and Snowdonia identifying these as a frequent outcome of appraisal. The guidelines for such designations need to be reviewed.
- Twelve authorities saw the issuing of guidance as a frequent or occasional outcome; two authorities responded that this was never the case; nine did not answer the question. This begs the question as to why reviews were carried out in the first place if no guidance is issued.
- In twelve cases, appraisal led frequently or occasionally to the revision of policy. In three cases this was stated never to happen, and in eight cases the question was not answered.
- Boundary review (which can encompass extension, reduction or no alteration) is a common outcome of appraisal; only two authorities indicated that the process had led to de-designation. The data was missing from seven authorities.

Given the limited interest in Article 4 directions, the question “what do Article 4 directions cover?” had a somewhat restricted relevance. However, the response is summarised in Appendix 1, tables 11 and 12, which indicate that the principle foci of controls are the replacement of doors and windows and the replacement or removal of roofs or chimneys. Five authorities also mentioned exterior colour schemes. Ten authorities had not made use of directions, and several did not return a response to some or all of these questions, indicating a limited interest in the matter.

Authority	Landmark buildings	Listed buildings	Listable / key buildings	Neutral / negative buildings
Blaenau Gwent Borough Council	No	No	No	No
Bridgend	Yes	Yes	Yes	No
Caerphilly	No	Yes	No	No
<b>Cardiff</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>
Ceredigion	No	Yes	No	No
Conwy County Borough Council	No	Yes	No	No
Denbighshire County Council	Yes	Yes	Yes	No
<b>Flintshire County Council</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>
Gwynedd Council	Yes	No	Yes	No
Isle of Anglesey County Council	No	No	No	No
Merthyr Tydfil	No	Yes	Yes	No
<b>Monmouthshire County Council</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>
Neath & Port Talbot County Borough Council	No	Yes	No	No
Newport County Borough Council	Yes	Yes	Yes	Yes
Pembrokeshire Coast National Park Authority	Yes	Yes	Yes	No
<b>Pembrokeshire County Council</b>	<b>No</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>
Powys County Council	No	Yes	No	No
Rhondda Cynon Taff	Yes	Yes	Yes	No
Snowdonia National Park	No	Yes	Yes	Yes
<b>Swansea</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>
Torfaen County Borough Council	Yes	Yes	Yes	No
Vale of Glamorgan	Yes	Yes	Yes	Yes
Wrexham County Borough Council	Yes	Yes	Yes	No

Authority	Permeability	Pedestrianisation	Traffic calming	Dedicated lanes
Blaenau Gwent Borough Council	No	No	No	No
Bridgend	No	Yes	No	No
Caerphilly	No	Yes	Yes	No
Cardiff	No	No	No	No
Ceredigion	No	Yes	Yes	No
Conwy County Borough Council	No	No	No	No
Denbighshire County Council	No	No	No	No
Flintshire County Council	No	No	No	No
Gwynedd Council	No	Yes	Yes	No
Isle of Anglesey County Council	No	No	No	No
Merthyr Tydfil	No	No	No	No
Monmouthshire County Council	No	Yes	Yes	No
Neath & Port Talbot County Borough Council	No	No	No	No
Newport County Borough Council	No	No	No	No
Pembrokeshire Coast National Park Authority	No	Yes	Yes	Yes
Pembrokeshire County Council	No	Yes	Yes	No
Powys County Council	No	No	Yes	No
RCT	No	Yes	No	No
Snowdonia National Park	No	Yes	Yes	No
Swansea	No	No	No	No
Torfaen County Borough Council	No	No	No	No
Vale of Glamorgan	Yes	No	No	No
Wrexham County Borough Council	Yes	Yes	Yes	No

**Table 6:** Outcomes of conservation area reviews  
Respondents were asked for information on the content of conservation policies as outcomes of reviews.

### 3.7 Policies

In a question distinct from the one that assessed the consequences of appraisals, the survey sought to analyse the form and content of local authority policies for conservation areas. It did not look in detail at the documents themselves; the analysis so far has been based on the information supplied by the respondents. Appendix 1, tables 13 and 14, summarises the type of document used to publish policies and analyse by authority the relevance of local plan, UDP (by no means all Welsh authorities have deposited their first draft UDPs), supplementary guidance and strategy reports. Inevitably the local plan and the UDP contain (or *will* contain) relevant policies, intended by current planning guidance to be of the broad brush approach. Twelve authorities reported that they currently make use of supplementary planning guidance; eight have made use of strategy reports. Cardiff, Denbighshire, Newport, Pembrokeshire County, and the Vale of Glamorgan have made use of both SPG and strategy reports. It should be remembered that supplementary documents, keyed into the development plan, are intended to be the vehicles for detailed policies for conservation area management, development control, and enhancement. For many authorities there is still some way to go in developing these tools.

Table 6 provides information that helps to gauge the *content* of conservation policies (wherever they are located). One could have extended the questionnaire to focus on other environmental features — boundary materials, setting, or natural/cultivated features, for instance. These would deserve analysis in the context of a closer look at the methodology of appraisal.

- Thirteen authorities specified policies relating to landmark buildings
- Twenty authorities specified policies relating to listed buildings
- Fifteen authorities mentioned policies relating to listable or key buildings
- Three authorities referred to policies affecting neutral or negative buildings
- Two authorities had considered the issue of permeability
- Ten authorities had movement policies that considered pedestrianisation
- Nine authorities had policies for traffic calming
- One authority had a policy for dedicated traffic lanes.

It should be noted that traffic calming and pedestrianisation are not simply issues for the big city; they may be relevant, too, in a rural village or a small town environment, as is exemplified by both Gwynedd and Snowdonia National Park. Two authorities had no policies in any of the categories suggested.<sup>3</sup>

### 3.8 Implementation and guidance

Urban design literature emphasises the role of area-based studies and site briefs as tools to influence the form, content and character of development; to provide means of influencing environmental quality; and to provide a focus not simply on individual sites or buildings but on the spaces between them. These are methods that might seem to have a special relevance to conservation area management, whether applied within a conservation area, to a conservation area as a unit, or, more importantly, to place conservation areas in the wider urban design context. It is in the development and deployment of such tools that the most effective linkages are likely to be possible between conservation professionals and colleagues from other design disciplines.

At this stage the study has not sought to analyse exemplar documents; but an attempt is made as an initial step to quantify the interest of authorities in their use. The information gathered is summarised in Appendix 1, tables 15 and 16. Briefly it identified the following characteristics:

- Site development briefs are a rare factor in a conservation area context; they were cited by seven out of 23 councils
- Twelve respondents had made frequent or occasional use of area briefs
- Nineteen had made frequent (nine) or occasional (ten) use of planning or development briefs
- Three had made frequent use of urban design studies; nine had done so occasionally
- Conservation area character studies were a common tool, mentioned by seventeen authorities, and presumably they could be generated conveniently from appraisals or designation assessments
- Permeability and/or legibility studies had been undertaken by seventeen authorities, though as the preceding analysis suggests, this had not been an activity with a significant policy outcome, with limited use of briefs or specialist studies.

The presentation of these figures in this table also shows how the frequency with which each tool is deployed in specific authorities has been interpreted. Thus Cardiff made frequent use of each model apart from site development briefs; Conwy made occasional use of planning or development briefs and frequent use of permeability or legibility studies but it did not utilise the other models. Pembrokeshire, which had been very proactive in designation, mirrors Cardiff in its use of the suggested tools.

The study also investigated how far authorities use their expertise to offer guidance to owners or developers on specific topics. Responses are summarised in appendix 1, table 17. Little guidance is offered on the availability of skilled crafts-

men, and no authority (despite the impact of highways design and signage on the appearance of a conservation area) had issued advice on traffic or directional signage. Two authorities (Cardiff and Swansea) had advice on public art. Four authorities issued advice on forecourt treatment. Ten authorities had guidance on outdoor advertising and eight on exterior treatments. Perhaps not surprisingly, guidance on form and massing, shop front design, roofs and chimneys, and doors and windows, was more common. The matrix in this table exemplifies the range of advice offered by each respondent, from the comprehensive (Cardiff) to the minimal (Torfaen) and the completely missing (Gwynedd, Monmouthshire, and Neath Port Talbot). These responses need to be analysed further within the context of the environmental character and pattern of settlement of the authorities concerned, a factor likewise reflected in the number of conservation areas managed.



**Fig 2 County Offices, Caernarfon**  
A modern building using traditional construction in an historic context.

### 3.9 Sustainability

In retrospect it seems that the question on sustainability was poorly worded. The intention was to explore how far council policy-making had applied general sustainability principles to conservation area practice. The majority of respondents referred to the general policies that have been incorporated in UDPs or local plans. One council stated that "...sustainability is at the heart of the UDP and runs through all council policies. They are effective."<sup>4</sup> Several admitted that whereas general policies were in place, there was no system of monitoring to measure their effectiveness. A minority of councils apparently had no sustainability policies. One noted that, while not specific to conservation area work, the local plan encouraged the re-use and rehabilitation of older buildings, and emphasised the need to find relevant uses for listed buildings. In this case, however, no monitoring was carried out.<sup>5</sup> Only one respondent mentioned specific policies encouraging sustainability in a conservation area context; these were to encourage the re-use of older buildings and to reject UPVC in favour of timber detail.<sup>6</sup>

It can be concluded that there is a need to think clearly about how sustainability can be built into a policy regime for conservation areas. It seems a simple enough concept, but is in practice complex and with many ramifications when applied to the built environment, even more so in the context of urban regeneration or conservation area management. Successful evaluation could depend on creative accounting and it might seem sensible to seek to develop an agreed methodology that could measure outputs against inputs, and monitor the effectiveness of general or specific

policies in relation to sustainability. Planning applications would require a sustainability statement for certain categories of development.

Translating UDP principles into this more specific context might lead to progress. One means might be to ensure a regular cycle of conservation area appraisal. Another might be to look at the requirements placed on developers. Nowadays buildings may be remodelled completely in ten years time, demolished in twenty, or listed in fifty. A well-designed building therefore needs to be robust, and capable of adaptation to different uses, accommodating changes of use several times during its lifetime. This objective could be introduced at the design stage as one of the criteria for appraisal within a sustainability evaluation.

It also seems clear that without adequate funding to maintain the fabric of conservation areas, both buildings and public realm, no conservation area is likely to be managed sustainably. At a less tangible level, it may also be argued that preservation and enhancement of the local character represented in urban fabric, through helping to maintain a sense of place, is an integral aspect of a sustainable community and urban environment.

### 3.10 Perceptions

So far this analysis has considered quantifiable data. In addition to this each authority was asked to submit qualitative comments on a number of topics. Not everyone who responded took this opportunity. Lack of appreciation of specialised areas obviously influenced the detail of some responses. In others there may have been a degree of officer reticence to express opinions of which management might have taken a dim view. In a number of cases, nonetheless, the responses were informative and often robust. The questionnaire asked for observations on the following issues:

- the effectiveness of government conservation area legislation and guidance;
- issues relating to designation;
- issues relating to conservation area management.;;
- issues relating to funding;
- the significance of design — this attracted little comment;
- public and community involvement in conservation area control, policy making and enhancement; and
- any matters deemed to have been omitted from the questionnaire.

Several comments were made about legislation and guidance. More than one respondent felt that both sources contained loopholes that made the role of the

planning authority problematic. The guidance offered by English Heritage was felt to be helpful compared with the Welsh guidance, which is limited to a circular that is derived from English PPG 15. It was felt that guidance needed to respond to circumstances in Wales and to the specific context of the Welsh historic built environment. One authority suggested that government in Wales needed to offer a comparable lead, and that Cadw should undertake this role.<sup>7</sup> Another authority argued that the legislative framework is weak because there is no pressure on planning authorities to prepare enhancement schemes, and that there is a need for more guidance on methods of appraisal to ensure consistency of approach across Wales.<sup>8</sup> There was concern too, regarding permitted development rights, seen by one respondent as so weak that they “encourage destruction of character.”<sup>9</sup> The Shimizu judgement has been taken account of in the Secretary of State’s directions in circular 1/98, but it was argued that the guidance remains poor in the aftermath of this decision, and that more controls are needed. The statistical evidence of reticence in applying Article 4 directions was reflected in observations made. Securing directions was regarded as continuing to be difficult and was hindered further by resourcing issues.<sup>10</sup> One authority commented that conservation area status is a very weak means of protecting an area of architectural or historic interest; designation is often a response to a threat of demolition, but without Article 4 directions it remained hard to prevent the erosion of character.<sup>11</sup> Guidance from the Assembly was necessary which would carefully balance conservation needs, urban design and regeneration.

The issue of funding was also seen as critical, and the information gathered about both staffing and capital investment must be seen in the context of the perceptions of those who struggle to do their job with limited resources. In general, securing funding to implement enhancement strategically was seen as problematic. This was a point made principally with regard to the position within LPAs, but it was also commented that, if Cadw’s staffing were to be strengthened, there would have to be more effective liaison between that body and the planning authorities, and, perhaps, more effective co-ordination between conservation bodies in Wales. It was suggested that conservation area management could not be achieved solely through the development control process, and that enhancement required a proactive approach facilitated by a dedicated budget. However, the picture with regard to local authority budgets and human resource allocation was regarded as increasingly bleak. Enhancement strategies required resources that were too often absent.<sup>12</sup> Perhaps these could be drawn from a range of sources, including urban design and regeneration programmes.

One respondent noted that the duty to designate was placed on local government but that funding was actually managed by central government with little concern expressed for the priorities advanced by councils. It was suggested that there should be more consultation between Cadw and the LPAs over the spending and management of conservation area grants. How could a planning authority enable enhancement when it has very little money to offer? The ability of local authorities to allocate internal funding to conservation area strategies was perceived to be compromised by competition from other spending departments. The unitary authorities have responsibility for former county functions, and these appear to have exerted pressure on the resources that the old districts had identified for conservation area

work. One respondent noted that the outcome of this situation was that the work of conservation staff has become reactive, and land-use oriented at the expense of repair and enhancement strategies. Funding had declined significantly since local government reorganisation (in fact in this authority the budget for conservation area work had been nil for the past three years).<sup>13</sup> In this context it was argued that external funding was generally limited to specific initiatives or to a limited number of conservation areas; the geographical allocation of resources was very patchy. The comment was also made that lottery funding aids regeneration areas rather than the repair and landscaping work that might be desirable in conservation areas.<sup>14</sup>

These problems were compounded, in respondents' eyes, by the difficulty they experienced within their authorities in getting a corporate approach to conservation area management. It was hard to persuade colleagues to prioritise conservation area enhancement in the context of other demands. They were often perceived as cosmetic exercises, but they can be essential in urban design terms.

Several comments were made about the relationship between lack of financial resources and problems experienced in getting either elected members or the public at large to appreciate the impact of designation. In the case of one authority this was seen to lead to different parts of the authority pursuing conflicting goals — the impact of housing group repair schemes was cited as an example. In another authority the policies of the highways department were regarded as inimical to conservation objectives. In a wider context, the view was expressed that public consultation and enthusiasm were essential to the success of conservation area policy. Lack of money was seen as an obstacle to this public engagement, for example the cash costs (as well as the staff time) involved in consultation over enhancement proposals. In any case, without money, public aspirations could not be readily supported. In one authority's response, this situation made it difficult to involve the public in conservation area issues to any meaningful degree.<sup>15</sup>

### 3.11 Crisis - what crisis?

While not all authorities responded to this aspect of the questionnaire, the nature of the comments that were made seemed to represent the genuine concerns of the professionals at the sharp end. The overall picture was one of deep anxiety that opportunities were being lost to manage, protect and enhance the historic environment in a strategic manner, and in a way that would reflect and engage public aspirations. The picture was one of crisis, deepening over the past three years, despite isolated examples where there had been significant funding investment in specific conservation areas as a by-product of other projects. In this context it was difficult to point critically at the variation in "good practice" across Welsh authorities. The general scene seemed to be one of a struggle to implement the legislation effectively and in the light of up-to-date thinking on tools for strategic management, a struggle exacerbated by low funding, conflicting priorities, and less than effective legislation and guidance.

These impressions were reinforced by the discussion in the seminar at which an initial presentation of the survey data was offered. The audience represented a mixture of LPA staff and private sector professionals. Points highlighted included:

- The pressure of other demands on LPA budgets
- In this context, the need to ensure effective cross-working amongst groups and departments within LPAs, while protecting conservation objectives
- That joint working of this kind could not be achieved within a National Park Authority, where other local authority specialisms are not employed.

However, beyond these points the seminar was the platform for a wider discussion of national policy issues, and the problem of public understanding of, and engagement with, the built heritage. The concerns raised at this point clearly connected with the observations these and other professionals had raised in their questionnaire responses. The final section of this report considers these general issues alongside more specific conclusions and recommendations arising from the survey. It also places this discussion in the context of wider thinking about the effectiveness of conservation area designation.

In England, the report of the Urban Task Force concentrated minds considerably and emphasised the importance of the relationship between conservation, development and social renewal. Lord Rogers argues, for instance, that development on brownfield land and the recycling of existing buildings must become more attractive than building on greenfield land. He also suggested that

Historic buildings and townscapes are important assets. However, their full worth and contribution, and indeed their long term futures, can only be realised if the buildings are in productive use.

He makes a case for the revision of PPG 15, and claims that the listing process (albeit that 80 percent of listed building consents are granted) is perceived to be a barrier to success — "national and local conservation bodies must work to find ways of reducing the deterrent effect whilst ensuring quality solutions." A further solution is seen in the harmonising of VAT rates on refurbishment and new build, either by removing VAT on conversion and refurbishment or by introducing zero-rating.<sup>16</sup> Action on VAT is something for the UK government, but there is no reason why this cause should not be promoted by the National Assembly, and the Assembly has considerable power to tailor planning guidance to the Welsh context, and create a framework in which the productive use of the historic built environment ensures a future for the buildings and townscapes that Wales wishes to cherish.

<sup>1</sup> The Civic Trust for Wales, *Conservation Areas* (advice note) (1991)

<sup>2</sup> English Heritage, *Conservation Area Appraisals* (1997), p.2; WO Circular 61/96.

<sup>3</sup> Blaenau Gwent, Isle of Anglesey

## Conservation areas in Wales

<sup>4</sup> Monmouthshire

<sup>5</sup> Torfaen

<sup>6</sup> Snowdonia National Park

<sup>7</sup> Pembrokeshire

<sup>8</sup> Gwynedd

<sup>9</sup> Anglesey

<sup>10</sup> Conwy's comments, for example. Cf Pembrokeshire, Newport, Denbighshire.

<sup>11</sup> Newport

<sup>12</sup> Cf. Pembrokeshire, Newport, Anglesey, Flintshire, Conwy, Vale of Glamorgan

<sup>13</sup> The latter comments are based on the Vale of Glamorgan response in particular.

<sup>14</sup> Snowdonia, Conwy

<sup>15</sup> Denbighshire, Pembrokeshire, Newport

<sup>16</sup> Richard Rogers (Lord Rogers of Riverside), *Towards an Urban Renaissance* (1999), 11, 251-2, 255.