

The future of our past: Consultation response form

Your views on the proposals set out in this consultation document will make a vital contribution to the further development of the Heritage Bill. Since the consultation treats a wide range of topics relating to the historic environment, you may find that some of the following questions fall outside your interest or experience. Therefore, please feel free to answer as many or as few of the questions as you like.

Please return this form to reach the Welsh Government no later than 11 October 2013.

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2 Identifying significance

Identifying and protecting historic assets of national significance

Scheduled ancient monuments

- P1** To allow the Welsh Ministers to designate sites that provide evidence of past human activity, including artefact scatters and other archaeological deposits devoid of structures or works.

Q1	Do you agree with proposal P1?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment: We presume scatter sites would also be defined by area?			

Listed Buildings

- P2** To allow new list entries to state definitively that a particular part or feature of a listed building or a structure attached to it or within its curtilage is not of special architectural or historic interest, and therefore is not designated.
- P3** To relax the rules governing the issue of certificates of immunity from listing so that applications could be made at any time.

Q2	Would proposal P2 improve the existing system for the designation of listed buildings?
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Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comment: We think this would be helpful, although we are mindful that it is all too easy for internal features to be dismissed as being not of interest because of oversight or lack of expertise on the part of the surveyor. It also does not allow for aspects of interest (for example by association) to emerge subsequently. For this reason we would wish to see this provision used sparingly and only in cases in which parts of a listed building are wholly and clearly identifiable as being not of special architectural or historic interest.</p> <p>However, where unimportant curtilage structures are concerned, it does highlight the problem concerning the definition of curtilage. If a process of gradually enhancing LBC descriptions is to be undertaken, we think that this should include the mapping of listed buildings' curtilages, so that these may all be eventually defined. As property boundaries are routinely held on LA GIS systems this should not be onerous as most cases would follow the existing ownership pattern. The process could be started as and when applications for listed building consent are made.</p>	

Q3 Do you agree with proposal P3?	
Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comment: However, we think it would be imprudent for certificates to be open-ended as the view of future generations may be different from ours. A 10-year time limit for immunity, which could then be renewable, seems sensible, and the normal process of rigorous assessment and consultation should be retained.</p>	

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Designations — consultation and review

- P4** To formally consult owners (where known), LPAs and other parties with a particular interest in a historic building or ancient monument on all applications for designations which are considered by the Welsh Ministers to meet the criteria.
- P5** To consider introducing interim protection for ancient monuments and historic buildings that Welsh Ministers are minded to designate.
- P6** To create a structure for the review of a decision on the designation of a historic building or ancient monument.

Q4 Do you agree with proposals P4, P5 and P6?

Yes

No

Comment: But with the proviso that these proposals form a single entity. We think the P5 interim protection provision, while Ministerial deliberations are occurring, is essential to protect the asset under designation from inappropriate alteration. This is particularly important now that there are so many initiatives offering energy saving and other building services. The P6 proposal should not be retrospective on decisions made before the introduction of these provisions.

Marine heritage

- P7** To use the scheduling powers in the Ancient Monuments and Archaeological Areas Act 1979 generally to protect marine historic assets.

Q5 Do you agree with proposal P7?

Yes

No

Comment: We have insufficient expertise to answer this question.

Historic areas — general

- P8** To establish a unified 'Register of Areas of Special Historic Interest in Wales' that would comprise:

Part 1: Historic Parks and Gardens,

Part 2: Historic Landscapes,

Part 3: Historic Battlefields.

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Q6	Do you agree that an online unified Register of Areas of Special Historic Interest in Wales would be beneficial?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: We think this would be beneficial, but only so long as all heritage assets are included (i.e. including conservation areas. Otherwise the resource would be misleadingly incomplete. The online resource will require permanently established active management.</p>			

Historic areas — parks and gardens

- P9** To consider options for requiring the Welsh Government to maintain and enhance the register of historic parks and gardens (part 1 of the proposed unified 'Register of Areas of Special Historic Interest in Wales') in accordance with the published criteria.
- P10** To explore ways of making successive owners aware of the status of registered parks and gardens.
- P11** To require LPAs to consult Cadw and a nominated amenity body on all planning applications affecting a registered historic park and garden or its setting.

Q7	Do you agree with proposals P9, P10 and P11?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: But we think the proposals could have been framed with a bit more commitment. Surely the P10 issue is easily resolved by making the designation a registrable land charge? Being semi-natural assets, parks and gardens are vulnerable to degradation by neglect. There is a particular need for their historic interest to be understood by their owners and appropriate maintenance and restoration plans instigated.</p>			

Historic areas — landscapes

- P12** To maintain the register of historic landscapes (part 2 of the proposed unified 'Register of Areas of Special Historic Interest in Wales') and establish a mechanism by which new historic landscapes can be nominated or existing areas amended or deleted.
- P13** To include historic landscapes in guidance for the sustainable management of the Welsh historic environment.
- P14** To work alongside colleagues elsewhere in Welsh Government to ensure that the proposed natural resource management approach is

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effective in delivering the sustainable management of historic landscapes.

Q8	Do you agree with proposals P12, P13 and P14?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment: This (P14) and the previous issue of historic parks and gardens (P10) raises the need for Guidance for owners and others regarding ongoing management of the designated areas and what, for example, generic changes might be acceptable. This could be provided in the form of a narrative guide for each designation.			

Historic areas — battlefields

- P15** To create and maintain a register of historic battlefields (part 3 of the proposed unified 'Register of Areas of Special Historic Interest in Wales') and to publish the criteria against which candidate sites are assessed.
- P16** To explore ways of making successive owners aware of register entries.
- P17** To produce planning guidance for the protection and sustainable management of both Tier 1 and Tier 2 sites on the register of historic battlefields.

Q9	Do you agree with proposals P15, P16 and P17?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment: We were among those agreeing with the need for a 2-tier Register in the previous consultation and we support this now. Integration, as proposed, with other protected landscape types will help to foster understanding of the general landscape protection issues along with those associated mainly with battlefields.			

World Heritage Sites

- P18** To explore ways of ensuring that public bodies give appropriate consideration to World Heritage Sites in Wales.
- P19** To publish guidance that would help local planning authorities (LPAs) take account of the qualities of World Heritage Sites.

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Q10	Do you have examples of instances where, in your view, proper consideration has not been given to the outstanding universal value of a World Heritage Site?		
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Please give details. We do not have any direct evidence to offer but would comment:			
<ul style="list-style-type: none"> • that clear definition needs to be given to the areas outside WHSs which are considered to constitute their 'setting'. There is considerable potential, for example, for damage to the setting of WHSs from high buildings or extensive development (e.g. windfarms or caravan sites) well away from the designated area. • Guidance should make it clear that applicants for planning permission and other consents should be the initial source of assessment of impact on a WHS. 			

Q11	What functions do LPAs exercise that could affect the outstanding universal value of World Heritage Sites?		
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Please give details. We are keen to see heritage protection embedded in all aspects of public life, not just the process of development control in conservation areas. This means that statutory heritage protections should be recognized in all public programmes and projects. In particular highway improvements, particularly as modern highway lighting can impact detrimentally on WHS character.			

Q12	Could LPAs change the way in which they exercise their functions to contribute positively to the preservation of the outstanding universal value of World Heritage Sites?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Please give details. LPAs should formulate, adopt and publish WHS Conservation Plans.			

Q13	Which decisions made by public bodies other than LPAs are capable of having an impact on the outstanding universal value of World Heritage Sites?		
Statutory undertakers and major infrastructure projects, e.g. windfarms, motorways, new railways etc. Such propositions should be subject to Heritage Statements whether statutory approval is required or not.			

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Q14 How should World Heritage Site status rank in decisions taken by public bodies?

World Heritage Site status is a global recognition of heritage quality. It is not, therefore, for local interests to trump the WHS objectives on the basis of locally perceived interests of priority. All public bodies, in all areas of public life, should be respecting WHS status and ensuring that their decisions conform to the objectives of the designation.

Q15 Would giving proper consideration to their outstanding universal value be likely to have a significant impact on development within World Heritage Sites or their settings?

Yes

No

Please give details. The answer to this question is “No” so long as the design team is sufficiently trained, skilled and aware of the issues to be able to take the designation into account appropriately. If the design team considers only the interests of the developer the answer would be, quite rightly, “Yes”. WHSs must not be compromised by insensitive developers who cannot see beyond their own narrow interests. This should not be seen as some sort of impediment to the development industry or economic progress. Obliging developers to demonstrate what consideration was given to protecting the outstanding universal value (OUV) of the WHS in the preparation of development proposals would raise awareness of the OUV and of the importance of WHS status.

Identifying and designating historic assets of local significance

Conservation areas

P20 To promote, through planning guidance, the use of characterisation as a vital tool in the formulation of proposals for the preservation and enhancement of conservation areas and as the most effective way of undertaking their identification and regular review.

P21 To merge conservation area consent with planning permission.

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Q16	Do you agree with proposals P20 and P21?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Please give details. It is acknowledged that the s71 requirements [P(LB&CA)Act1990] have rarely been complied with. As with the development of the statutory list of historic buildings, gradual rectification of this shortcoming, under Government guidance, is indicated. Because of the more general nature of the heritage qualities of conservation areas, there is scope for contributions to this process from within the communities concerned as part of their community planning processes and the process of understanding historic character and identifying historic assets of local significance. Many communities have appropriate expertise that could be harnessed to this end. We support the P21 proposal on the basis that the demolition of unlisted buildings in Conservation Areas should be a requirement of planning permission rather than CA consent.</p>			

Historic assets of local significance

- P22** To explore ways in which LPAs can be encouraged and supported to identify historic assets of local significance. This might be achieved through regional collaboration.
- P23** To formulate and publish guidance that would aid LPAs in the preparation of local lists of historic assets by identifying appropriate criteria for assessing significance and establishing a methodology for nomination, consultation, validation and appeals.
- P24** To develop, in partnership with LPAs, model local development plan policies and supplementary planning guidance for the protection and management of historic assets of local significance.
- P25** To prepare guidance to support the use of characterisation studies in the sustainable management of historic assets at a local level.

Q17	Do you believe that regional collaboration would be effective in identifying and protecting historic assets of local significance?		
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
<p>Comment: Not on its own. We support this general approach but consider the process to be flawed unless structures so identified can be protected from arbitrary alteration and demolition. The consultation seems to be saying that no new protections will be instigated, but this means that there is no protection for structures being summarily demolished by owners following considerable efforts by the local community to designate them as being of local value. We think this is a major weakness of the proposals.</p>			

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Q18 How could third sector organisations assist local authorities in identifying historic assets of local significance?

This process runs the risk of being ineffectual for lack of consistency. Centrally issued Guidance on procedure will be needed to ensure that LPAs do not have to deal with multiple cases all prepared on different bases. The need for this is reinforced by the fact that LPAs are not likely to have significant resources to support the process or to evaluate proposals. Ways of assessing local significance would need to form an integral part of the Guidance.

Q19 What would you like to see in any published guidance for aiding the protection of historic assets of local significance?

We would like to see an online facility set up. This would benefit enormously from case studies and other practice on the ground that will surely emerge in quantity as soon as the process is instigated. The ability to learn from early experience is essential.

Q20 How can characterisation studies support the identification and sustainable management of historic assets and areas of local significance?

This is allied to the issue of conservation area characterization studies referred to in Q16: by providing expert input to raise awareness of significance of historic assets allowing local communities the opportunity to make informed decisions.

3 Sustaining significance: Managing change in the historic environment

Heritage partnership agreements

P26 To enable the establishment of heritage partnership agreements (HPAs) between consenting authorities and owners for a programme of permitted works within a fixed period.

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Q21 Do you think HPAs would be useful in Wales?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: We think they would be useful in principle. However there is a danger that they might be seen as a mechanism for avoiding statutory controls rather than complying with them more efficiently. The fact that HPAs come with significant obligations on the part of the estate owner must be emphasized as a major component of their use.</p> <p>HPAs will be appropriate in some instances, with multiple identical assets individually listed (eg. terraced housing in single management) or large buildings with standardised modular elements (eg. 20C schools, factories and hospitals). Conditions of HPAs must be enforceable with the same penalties for infringements as unauthorised works to listed buildings.</p>			

Improvements to the listed building consent process

- P27** To provide greater clarity through guidance on what works do and do not, in the opinion of the Welsh Government, require listed building consent (LBC).
- P28** To provide guidance on the sustainable management of listed buildings based on the Conservation Principles.
- P29** To promote more widespread use of pre-application discussions as part of the LBC process.

Q22 Do you agree with proposals P27, P28 and P29?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: We support these proposals. P27: it needs to be very clear in guidance what “like-for-like” means and the extent to which timely maintenance and proper repair can be more cost-effective than replacement. Uninformed developer interpretation of terms is not a way for them to avoid their obligations to a heritage asset or a way of avoiding proper control of inappropriate alterations. P28: we support the issuing of Guidance. It should incorporate Circular 61/96 as well as Conservation Principles. P29: Pre-application discussions should be the norm but there is a resource issue here with some LPAs charging not inconsiderable fees for them. This aspect should be considered in association with P30. Owners and applicants should also be strongly encouraged to seek the services of accredited conservation professionals when dealing with historic buildings as this can lead to quicker identification of the most appropriate solutions and thus significantly avoid delays in obtaining consents.</p>			

- P30** To enable more LPAs to decide certain LBC applications affecting grade II listed buildings without reference to the Welsh Ministers after

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allowing them a fixed time to develop professional expertise at officer level and supporting policies and procedures.

P31 To explore introducing a system that would give applicants a formal assurance that proposed works on a listed building do not require LBC.

P32 To consider streamlining the LBC approval procedure for works that have no adverse effect on a listed building, its setting or any features of special architectural or historical interest that it possesses.

Q23 Consultees are asked to discuss the merits of proposals P30, P31 and P32, giving particular regard to:

- whether they would offer sufficient protection to historic buildings,
- the extent to which they would reduce the numbers of LBC applications,
- the extent to which they would speed up the determination of LBC applications, and
- any risks that they might introduce.

We think that LPAs sometimes have an uninformed view of the expertise required to provide an adequate historic environment service. This proposal would be a welcome incentive to employ staffing resources with the necessary qualifications and skills. It would need to be a matter for Welsh Government audit and the proposal should be accompanied by the loss of the relevant status should the expert resources not be maintained. We think there would be an acceleration of LBC processes as well as better ability to deal with the P26-P29 proposals.

However, we think these proposals are not likely on their own to generate what we would like to see: a properly resourced, qualified and experienced professional conservation team in or available to every LPA to support their planning and regeneration services.

Q24 What kinds of works would have no adverse affect on the character of a listed building and could be subject to a streamlined LBC system?

There is potential for any type of work on a Listed Building to have a detrimental effect on its character – every building is different and it is difficult to generalise. This is why the LBC system was set up the way it was: to allow the specific effects of specific proposals on specific character to be properly assessed. Hypothetical assessments of the type proposed are not appropriate and are very likely to lead to unforeseen problems or reduced heritage quality.

Q25 Are there any other measures that would help to overcome present weaknesses in the system?

A requirement that only conservation accredited professionals (appropriate for the work) be employed to design and supervise works affecting Grade I and II* buildings.

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Listed places of worship and ecclesiastical exemption

P33 To update the Ecclesiastical Exemption (Listed Buildings and Conservation Areas) Order 1994 and the guidance on works that are, in the opinion of the Welsh Government, covered by the exemption.

Q26 Do you agree with proposal P33?
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comment: But we are not entirely content with the operation of the Ecclesiastical Exemption process as we do not consider that all the denominations listed have adequate systems in place. We think a full review of the EE process is required with (after a period for improvements to be made) exclusions from the list of those denominations not performing adequately.

Unauthorised works to listed buildings

P34 To consider introducing a power for LPAs and the Welsh Ministers to issue a temporary stop notice for unauthorised works on a listed building.

P35 To explore ways to ensure that fines issued by magistrates' courts will act as effective deterrents to unauthorised works.

Q27 Do you see merit in introducing temporary stop notices in Wales?
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comment: We consider that priority should be given to processes that prevent contraventions occurring, halt them if in progress and reduce their impacts rather than taking retrospective action.

Q28 Can you give examples of occasions when such a notice would have been useful?
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Please give details. A listed building owner in Dolgellau was advised prior to any works that window replacement would require LBC. The advice was ignored and works commenced. The owner was informed during the works that he was committing an offence but works carried on regardless. A stop notice would have reduced the seriousness of the offence and avoided unnecessary damage to the property.

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Q29	Can you give examples of fines imposed by magistrates for unauthorised works to listed buildings that were, in your opinion, inadequate?		
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Please give details.			

Q30	Would higher fines act as an effective deterrent to unauthorised works to listed buildings?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: Most contraventions of LBC are caused by lack of appreciation of the issues rather than wanton contravention of the law. Higher fines in cases where developers have deliberately ignored instructions or guidance from the LPA would be beneficial. Fines should be assessed on the basis that they far exceed the value of any gain made as a result of the contravention and magistrates should be required to have regard to valuation evidence put in front of them by the LPA and to include the cost of this evidence in any award of costs.</p> <p>Where Magistrates feel that the case may merit a greater penalty than they are able to imposed, they should be advised to refer cases to a higher court.</p>			

Historic buildings at risk

- P36** To promote collaborative working across the Welsh Government and other public services to find imaginative solutions for vulnerable and at risk listed buildings in future regeneration and housing renewal projects.
- P37** To complete and review regularly the all-Wales condition survey of listed buildings.
- P38** To develop joint working between the historic environment conservation services of LPAs to promote best practice and support effective enforcement action.
- P39** To target any available funding towards historic assets most at risk.
- P40** To extend the use of urgent works notices to occupied buildings, unless they are in residential use.

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Q31 How can proposals P36, P37 and P38 be best implemented?

It is apparent that some buildings at risk (BAR) are so degraded that they are little more than ruins. It is futile to treat hopeless cases by the same provisions for buildings which have economic futures. The process should allow for the de-listing of hopeless cases where justified by independent assessment where there is no development potential to have been a driver for the neglect in the first place. We welcome regular surveys of BARs but this is futile unless there is a strategy for dealing with them once identified including adequate resources for action. An online system which is capable of continuous update by Cadw and LPA officers and others would be the best way of combining up-to-date information with the need to economize on survey costs.

In the near future we are highly likely to see a sharp increase in redundant places of worship, law courts and other similar buildings, many of which have historic interiors, which preclude alternative use without substantial removal of fabric. Imaginative pragmatic solutions are needed to deal with this issue in order to avoid a rash of derelict structures disfiguring our towns, cities, villages and countryside.

Q32 Do you agree with proposal P39?

Yes

No

Comment: A protocol would be required to target cases where best value for money can be achieved. Some historic buildings are restored using heritage and other lottery funds. There needs to be collaboration here.

Usually there is a reason why a historic asset is most at risk – location, design, size, ownership history etc. In deciding which asset to target with scarce resources these reasons must be understood and taken into account. In a perfect world no historic asset would be at risk, but in the real world flexible approaches must be adopted to secure best use of resources.

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Q33	Would it be useful to extend the scope of urgent works notices to include occupied buildings, provided they are not in residential use?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: But it is not clear why residential buildings have been excluded. There is often a thin line between “can't pay” and “won't pay”. Few listed buildings are owned by those who owned them at the time of designation and, generally, the obligations of listed building ownership can be assumed to be known to owners. Urgent works almost always comprise works that a prudent property owner should undertake anyway and almost invariably would reduce the long-term repair bill that would ultimately occur. Perhaps a loan scheme chargeable to the property might be useful.</p> <p>The scope of urgent work notices should be extended beyond emergency repairs to keep a building wind and weather proof and safe from collapse. These works are by their nature temporary, and unless followed up by more extensive work will need to be repeated, or prove to be a waste of effort. The cost of undertaking such work should be a charge on the property.</p>			

Scheduled ancient monuments

- P41** To look at options for introducing measures similar to listed building enforcement notices and (if required) the proposed temporary stop notices to allow action to be taken against unauthorised works to scheduled ancient monuments or breaches of SMC.
- P42** To consider extending the Welsh Ministers' current powers of entry so that they may allow nominated persons to undertake archaeological excavation and recording of a monument damaged by unauthorised works, or at risk of imminent damage or destruction, without the owner's consent.
- P43** To allow the Welsh Ministers to refuse to determine an SMC application where a similar application has been made in the past two years, or on land which, or by an applicant who, has undischarged conditions from an earlier SMC.
- P44** To enable the Welsh Ministers to issue SMC for works already executed.
- P45** To remove the automatic right of applicants to be heard by an appointed person before a decision is taken on an SMC application and allow the Welsh Ministers to employ the most suitable means to determine an application.
- P46** To ensure that Welsh Ministers can issue an SMC and agree variations to that consent by means other than in writing.

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Q34 Do you agree with proposals P41, P42, P43, P44, P45 and P46?	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Comment: This all looks sensible.	

4 Reviewing the organisational framework for historic environment services in Wales

Strengthening strategic partnerships

- P47** To develop and consult on strategic plans for the historic environment sector at four-yearly intervals, covering each of the key functions in paragraph 4.1: knowledge, conservation and public engagement.
- P48** To create a mechanism for the provision of independent expert advice to inform the Welsh Government's historic environment policy and the operational work of those who deliver public historic environment services at a national level in Wales.
- P49** To bring together the functions of the RCAHMW and Cadw into a single integrated national historic environment service either within or outside the Welsh Government.
- P50** To consider whether to place a requirement on the Welsh Ministers or on any new body outside government delivering the merged service to curate, maintain and enhance the NMRW..
- P51** To consider whether to place a requirement on the Welsh Ministers or on any new body outside government delivering the merged service to survey, investigate and interpret the Welsh historic environment..
- P52** To consider whether the Welsh Government should maintain an online, digital, map-based, publicly accessible record on which all nationally designated and registered historic assets would be depicted and described.
- P53** To consider whether guidance should formally recognise national standards for Wales for collecting and depositing archaeological archives when undertaking archaeological work in connection with the planning process.

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Q35	Do you agree with proposal P47 to develop regular strategic plans for the historic environment sector?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: This seems a timely proposal, but it will require a permanent source of resources. There seems little benefit in expending effort in the first round of plans if subsequent reviews are to be merely lip-service to the process.</p>			

Q36	Do you think that four years is the correct interval for the development of such plans?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>How do you think they can best be developed and delivered?</p> <p>Collaboration is beneficial, but strategic plans require an author to drive them forward. If the plans are to reflect the contributions of many different bodies the use of Consultants seems appropriate, but the qualifications and experience of proposed consultants will be critical to the process.</p> <p>Whilst considering a review every 4 years to be good practice, a strategic plan should have a longer shelf life than this as the resources to keep up-to-date with a 4-year cycle may not always be possible in practice.</p>			

Q37	Do you agree that there should be a new historic environment advisory panel?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>If so, what would you see as the key roles for the proposed panel? There is huge gap currently in Wales since the demise of the former historic buildings and ancient monuments advisory committees, leaving the Government's heritage body with no peer review and the Minister with no independent informed advice.</p>			

Q38	Can you suggest ways of ensuring that the panel provides the impartial arm's length perspective, where this is required, in relation to the delivery of public historic environment services at a national level in Wales?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Please elaborate. By ensuring that it contains a balance of elected and appointed members capable of providing the Minister and WG with an informed, educated and experienced view of all aspects of the work of the heritage body.</p>			

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Q39 What do you believe would be the most effective operating model for the delivery of an integrated national historic environment service (proposal P49)?
Please elaborate. There is precedent for such amalgamation in England. However, it is important that the streamlining of functions do not result in valuable aspect of the service being downgraded through overzealous spending controls or indifference in management perspectives. Periodic WG appraisal of performance will be important. Similar proposals are currently being made in Scotland. Collaboration in the examination of issues and the development of proposals may be useful.

Q40 Do you agree that proposals P50 and P51 would provide effective protection for the current key functions of the RCAHMW?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If not, what other measures do you believe could be considered? What issues might arise? Subject to our response to Q39.			

Q41 Do you agree with proposal P52?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment: Given the extent to which other aspects of public life have been captured on GIS it is time for the Historic Environment to catch up. The process should the digitisation of listed building curtilages most of which will be entirely uncontroversial. This is another area where there is a huge gap in Wales. An online accessible database is urgently needed.			

Q42 Do you agree with proposal P53			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Delivery of historic environment services at a regional and local level

P54 For the Welsh Ministers to work with the Welsh Local Government Association in encouraging the establishment of formal agreements between groups of local authorities, facilitating greater collaboration in the provision of historic environment conservation services.

P55 To consider whether there are appropriate mechanisms to put the HERs on a more formal basis in order to secure their continuation.

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Q43	Do you agree with the need to establish more formal agreements between groups of local authority conservation services?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>Comment: The dangers of collaboration are that the parties each assume they will get more than their fair share of the resource and that, as a result, the service will be no better funded than previously. It must be stressed that such a proposal is to improve the delivery of service and not, primarily, to reduce costs.</p> <p>As things stand currently conservation (and other) resources within existing LAs in Wales are so short that amalgamation or co-operation are unlikely to serve the interests of consumers or heritage itself. With more cuts in the pipeline we suspect more radical changes are inevitable, with further Local Government reorganization likely. Savings in such a process might allow for a better structured heritage delivery service to be engineered. The WG needs to determine what sort of service is required and set one up that can perform properly. The pretence that an underfunded theoretical structure is adequate is no longer appropriate.</p>			

Q44	Do you agree that such agreements should cover the areas suggested in 4.43 above?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
What other areas might such agreements cover?			

Q45	Do you agree with proposal P55?		
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If so, how can this be achieved? HERs have been shown to be effective with adequate resources to run them.			

Supporting the third sector in providing pan-Wales historic environment services

P56 For the Welsh Ministers to explore ways to encourage and support the establishment of a membership-based umbrella organisation to support the network of voluntary and non-governmental heritage organisations in Wales.

P57 For the Welsh Ministers to explore the possibility of the establishment of a national heritage preservation trust or network of regional Welsh heritage preservation trusts.

The future of our past: Consultation response form

Q46 Do you agree with proposal P56?	
Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>If yes, what form do you think such a network might take and how do you think it could be funded?</p> <p>The IHBC has for many years actively supported the creation of a Welsh heritage network and was a partner in an earlier initiative which unfortunately failed to come to fruition. With expectations being raised through this consultation it is vital for the third sector that this does not recur.</p> <p>The network must have a Welsh identity, be based in Wales, and have its own board made up of representatives of Welsh organisations. It should be constituted to be broad and inclusive, attracting as wide a membership base as possible by actively encouraging membership from third sector groups of all sizes, and it should develop its own ethos and range of activities from necessarily modest beginnings. The network should ideally be hosted by an existing Welsh built heritage organisation. In view of its experience the Heritage Alliance should be commissioned to assist in the network's creation</p> <p>Initial pump-priming funding must inevitably come from Cadw and possibly HLF, although existing third sector organisations such as the National Trust might also assist. In the longer term, income may also be derived from membership fees, sponsorship, profit from training events etc.</p>	

Q47 Do you agree with proposal P57?	
Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>What form do you think such a trust or trusts could take and how could funding be provided?</p> <p>It is encouraging that consideration is being given by the WG to the idea of a new pan-Wales BPT or regional network of BPTs, but funding implications inevitably are paramount. Existing BPTs in Wales currently do not even benefit from the support of an APT Development Officer, and priority therefore should be given to funding one or more development officers to work in the field. Pump-prime funding might be provided by Cadw, HLF or AHF. As confidence and capacity grows in existing BPTs, some of which already have a regional remit, the perceived gap in geographical coverage should recede.</p> <p>A pan-Wales BPT might be sponsored by the new national heritage body that we advocate, but that would very much depend on how the latter is constituted. As well as a general pan-Wales BPT, consideration should also be given to thematic BPTs- for example a strong case could be made for a national BPT specializing in the acquisition and conversion of redundant religious buildings (which fall outside the remit of FoFC and WRBT).</p>	

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Q48 We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please raise them here.

We appreciate and support the thoughtfulness of the proposals.

We support the introduction of the minimum number of new bodies to implement what is required. A single charitable trust outside Government but funded by and responsible to it taking all the functions proposed in the paper is to be preferred.

We support the introduction of a single and properly maintained on-line heritage resource.

We support the harnessing of contributions and expertise from the communities of Wales. With suitable co-ordination and support, such contributions could be great.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here.