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BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs		
HERITAGE BILL FOR WALES : OPTIONS FOR THE DELIVERY OF LOCAL AUTHORITY HISTORIC ENVIRONMENT CONSERVATION SERVICES IN WALES		

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. Less than a month to respond makes it very difficult to produce well-considered responses, particularly in matters of fundamental change such as these. However, we accept that this is an early consultation designed to inform a later recommendation and in this light have gathered some limited opinion from our membership which comprises Historic Environment professionals in both the public sector and private sector. By co-ordinating this response, it represents the views of the Institute rather than any particular sector.

Overview

On the whole the Report is balanced and well-considered. However it does, in our view, have two major shortcomings. The first is that it considers HE services mainly as a discrete and detachable component of Local Authority activity rather than a component of the cultural dimension of communities needing to be embedded in local service delivery. The Welsh Government's direction of travel in historic environment matters in recent years has (as we say below in answer to Question 1) been in the direction of local engagement and the IHBC has strongly supported this approach both in Wales and in the other UK administrations.

The second shortcoming is that it doesn't seem to recognize that HE building conservation services are a fundamental built-in component of the Planning System's delivery of sustainable development with a need for hands-on management and

day-to-day officer contact to ensure that HE and other planning considerations are properly balanced; not to mention the need for HE input into urban design and regeneration issues. To relegate these matters to consultation with a remotely located body would be enormously detrimental to the service in our view. HE needs to be engaged in the process of sustainability and not merely a component to be consulted on, agreed with or over-ruled.

We also note below the absence of any costed proposals for Options 2a/b and 3a/b (including any necessary capital, set-up, transfer, and other non-recurring costs) which means that we have been unable to comment cogently on them. Nevertheless, as we don't feel that either of these shows any signs of substantial benefits in terms of service delivery, we think the further development of Option 1 to be the best course of action.

Question 1

As many of the report's findings are based on the survey undertaken by the IHBC on behalf of Cadw in 2012, [*Quantifying Local Planning Authority Conservation and Archaeological Staffing in Wales*] there is no need for us to dwell on the 'core and wider functions of conservation officers'. However, we were surprised that the analysis set out in paragraphs 2.1-2.13 makes little reference to emerging policy, and in particular the changing role of heritage in regeneration and localism initiatives. For example, the Welsh Government Review of Regeneration, its 'Independent Advisory Group Report on Planning 2012', and on-going research into the role of City Regions as part of the Wales Spatial Planning Framework. All have the potential to have an impact on service delivery: creative links could merit further study.

Alongside these, there are two recent and significant Cadw publications: the Minister's 'Historic Environment Strategy for Wales' 2012, and 'Conservation Principles' 2011. Both set out an approach to the protection and management of the historic environment as a whole and promote 'community engagement, learning and access' as core parts of emerging heritage policy and action. We would like to see a better account of the Strategy and Principles in the research, so that future service provision can deliver the good intentions in each, and with adequate resources and conviction. This is particularly important for Conservation Principle 3: The historic environment is a shared resource.

Question 2

The strengths and weakness identified in Section 2 are well described. However, they are not supported by any real account or assessment of the adequacy of resources to support the provision of historic environment conservation services across Wales. The paucity of resources lies at the heart of every problem or weakness described. We would like to see more research into how alternative funding programmes might strengthen and support the service. This would be in line with recent initiatives which put heritage and an understanding of character and place at the heart of regeneration and tourism programmes. There may also be scope to look at ways in which the private and public sector could work or collaborate on the delivery of services. Expensive consultancy fees might not be the only outcome of such an approach.

The Options

Although a look ahead is welcome, we are surprised that changes are proposed in advance of the White Paper and concerned about the lack of any synergy between the proposals and the thrust of much of the very positive and useful work undertaken by the Welsh Government in consulting and preparing the ground for the draft Heritage Bill.

In the absence of any financial analysis of the supposed benefits and costs, (particularly as regards time saving) it is difficult to rank any Option beyond 1a and 1b. It is of particular concern that the recommendations are designed to address failure to deliver services at times of staff shortage or absence. These problems will not disappear simply by re-distributing whoever remains to deliver a service across a wider geographical area.

The report's lack of adequate consideration of the local decision making process, and the need for specialist services to operate within an environment sensitive to local need and aspiration is also a missed opportunity. It underplays the role and duties of Local Authorities as publicly accountable bodies, operating in accordance with the Committee on Standards in Public Life: the "Nolan Principles".

Given the findings of its own survey into the capacity in local authority heritage services, the Institute is more than aware of the root of the problems, both as regards the pressures conservation services face in delivering a service and in the expectations of the public. The IHBC therefore appreciates the intention behind the consultation which is to ensure that Local Authority Conservation Services in Wales remain fit for purpose in the face of severe limitations in public funding.

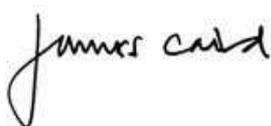
Conclusions

In responding to the Minister's Inquiry into the Welsh Government Heritage Environment in Wales in June 2012, the IHBC noted that "Wales has an enormous resource of historic assets and in many ways is well-placed to develop this resource into a world-beating heritage management system. The trick will be to embed heritage policy in all aspects of policy for the benefit of the economy and community rather than treating the management of historic environment as an add-on".

At about the same time, the Institute responded to a DCMS consultation on 'Improving Listed Building Consent' [August 2012]. In this it recognised that "local accountability is vital to the decision making process", stating that "getting services delivered by co-operation between local authorities instead of individual authorities, changes the way local councils operate quite significantly". It also recognised that "Joint decision-making will involve a need to negotiate potentially very different priorities between councils, a shared responsibility for the outcomes, and the implementation of policy [at] a distance from the decision-makers". These concerns are relevant in Wales too, and though relating to a specific function, merit review in the Welsh context.

So despite the Report's account of existing provision, concerns remain with regard to Options 2a/b, and 3a/b. For this reason we have only ranked Options 1a and 1b, and consider that until the White Paper is published, and links with other policy initiatives and funding streams explored, further any attempt to define an alternative method of service delivery is premature.

Yours faithfully



James Caird
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