

HE 49

Y Pwyllgor Cymunedau, Cydraddoldeb a Llywodraeth Leol

Communities, Equality and Local Government Committee

Bil yr Amgylchedd Hanesyddol (Cymru)/Historic Environment (Wales) Bill

Ymateb gan: Cyngor Sir Fynwy

Response from: Monmouthshire County Council

**Committee Clerk
Communities, Equality and Local Government Committee
National Assembly for Wales
Cardiff Bay, CF99 1NA.**

15 June 2015

Dear Sir

The Historic Environment (Wales) Bill

Consultation comments from Monmouthshire County Council

Thank you for the opportunity to comment on the draft Bill.

Monmouthshire has an especially large number of heritage sites designated as either listed buildings, scheduled monuments, registered parks and gardens as well as having part of the Blaenavon Industrial Landscape World Heritage Site. Heritage is therefore an issue of high importance to this Council and its long track record in maintaining a high standard of conservation was reflected in it being the first local authority in Wales to receive delegation from Cadw.

We welcome the Historic Environment Bill and very largely support the proposed changes and measures it proposes, though we would like to make the following comments.

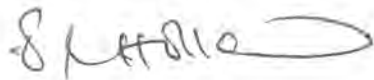
- We would like clarification on the recovery of costs with regard to Urgent Works Notices. Currently this is done through a S.55 Notice but the Bill proposes that local authorities would be able to place a charge on the land. Our concern is that unless this is a first charge this option might not result in any recovery of costs and so we would like Ministers to amend this measure accordingly.
- In Monmouthshire we are having to address a considerable amount of unauthorised works so we welcome the proposed introduction of Stop Notices.
- We are disappointed that the opportunity has not been taken to afford statutory protection for historic gardens, only the statutory duty to maintain the Register. Whilst any approach to consent would have to take into account the need for planting it would be of benefit to provide greater protection to garden and parkland design.
- We would have liked to have seen stronger powers proposed for rescuing Buildings at Risk. The existing system too often ends up with the Urgent Works Notices or Compulsory Purchase occurring only at the point where the building is about to be

lost altogether. Not only does this mean that in the intervening period there is considerable loss of historic character but also the eventual repair is a great deal more expensive. Allt y Bela, near Usk is a good local example of this.

- A requirement to introduce local lists would present a real resource issue. Monmouthshire's Conservation team would not have the capacity to compile and maintain such lists without additional resource which in the current economic climate is not an option. Monmouthshire has a larger number of listed buildings (c.2,500) than most authorities in Wales and therefore we already have a lot of heritage to monitor and manage. Our concern is that it will raise public expectations but it is unclear to us what, in reality, will be achieved through creating non-statutory local lists. These existed in the early days of listing and were abandoned in early 1980's because their status was ineffective in delivering meaningful protection

Please keep us informed of progress of this Bill.

Yours sincerely

A handwritten signature in black ink, appearing to read 'E Holland', with a long horizontal flourish extending to the right.

Edward Holland
Conservation Manager