

HE 16

Y Pwyllgor Cymunedau, Cydraddoldeb a Llywodraeth Leol
Communities, Equality and Local Government Committee
Bil yr Amgylchedd Hanesyddol (Cymru)/Historic Environment (Wales)
Bill

Ymateb gan: Trysor

Response from: Trysor

1. Who are Trysor

- 1.1. Trysor is a small, independent, heritage partnership which was established in 2004 by ourselves, Jenny Hall and Paul Sambrook. We are both Members of the Chartered Institute for Archaeologists (MCIfA) and Trysor is a Registered Organisation with the CfA, one of many such organisations working in Wales, only 6 of which are solely based here.
- 1.2. We have both previously worked within the Welsh Archaeological Trust (WAT) system for a decade. Jenny Hall had 10 years' experience managing the Sites and Monuments Record (SMR) for Dyfed, now known as the Dyfed Historic Environment Record (HER).
- 1.3. We are HER users on a daily basis for research purposes, for a wide range of clients, including community groups, tourism organisations and commercial clients. We regularly use all four Welsh HERs.

2. Analysis of HER data

- 2.1. Trysor carries out a large number of appraisals or assessments for planning purposes at present. These require that we have to study blocks of landscape of 2km radius around proposed developments. We use the HER for each of these assessments and closely scrutinise the content of the record in preparing impact assessments on historic and archaeological

features. Our professional standards require us to assess the quality of the data in the sources consulted.

2.2. We have also undertaken archaeological field surveys and heritage resource audits over extensive landscapes. These also require detailed scrutiny of the HER for the relevant landscapes.

2.3. It is usual for us to identify new archaeological or historic sites in our daily work and we record these in our own project databases and reports, copies of which are supplied to the relevant HERs and the National Monument Record (NMR).

2.4. The exceptions to this rule are a series of upland field surveys we undertook for the RCAHMW's Uplands Initiative programme between 2005 and 2015. The results of these projects were supplied only to the NMR. To give some indication of the importance of the work of field archaeologists outside the Trust system, we note that Trysor alone recorded approximately 9,500 new archaeological sites in that decade as part of this project.

2.5. This background gives us very good oversight of the HERs as users. It also allows us to make statistical analyses based on our own experience.

2.6. For the purposes of this submission, we have examined the last 22 historic environment assessments we have undertaken. They tend to focus on the southwest and central districts, but experience in northwest and southeast is comparable.

2.7. The important figures derived from this analysis are;

2.7.1. We made use of 966 HER records across the 22 assessments.

2.7.2. 19 (1.97%) of these were mislocated sites i.e. they had an incorrect grid-reference and were actually located outside the 2km radius study area.

2.7.3. 8 sites (0.8%) were poorly recorded i.e. the locational information provided did not appear correct but there was insufficient detail to remedy the problem.

2.7.4. 52 (5.38%) sites had incorrect NGRs i.e. they were mislocated but within a scale of tens to hundreds of metres from the location at which the HER had recorded their position and still lay within the 2km radius study area.

2.8. Collectively, this means that 8.18% of locational information for HER records scrutinised were incorrect. If this sample is taken as being representative across the HERs, this means that over 8,000 sites of the 100,000 sites which are said to be currently recorded in the HERs (as stated on the Archwilio website) are wrongly located. Such discrepancies can cause significant problems in some instances, including wasting time and resources in association with planning applications and developments. This can undermine the credibility of the system and the wider heritage profession.

2.9. Trysor created records for 117 new sites for this group of assessments/appraisals, which would mean a 12% increase on the number of recorded sites. Only sites of relevance to the matter under study, or of great importance, would usually be recorded so this figure does not fully represent the number of new records that could be created by each project.

2.10. Some of these new sites will be derived from the RCAHMW's National Monuments Record (NMR) which includes many sites and buildings not included in the HERs.

2.11. It is evident that the omission of many sites from the HER means that the HER does not provide comprehensive coverage

for every community at present. They cannot be used in isolation and to be effective as a tool have to be used in conjunction with the NMR as well as new research. Cadw's Scheduled Ancient Monuments and Listed Buildings descriptions are also useful sources of additional information. A study of any area is never complete until original research is blended with the material in these sources, although the details from each of them often need updating.

2.12. The proposal to make the HERs statutory records is to be welcomed, but more thought is needed with regard to the expectations placed upon the HERs and the resources allocated to them before such a step is taken.

3. The Scope of Welsh HERs at present

3.1. At present the language of the Guidance Notes (3.1 (h)) implies that all sites of archaeological, historical and architectural interest are to be included in their HERs;

3.1.1. "Details of every other area, site, or other place in a local planning authority's area which the authority considers to be of historic, archaeological or architectural interest" (Draft Bill, Part 4, Section 33 (2) (h))

3.2. This wording, we believe, could be interpreted to mean that any areas, sites or buildings which are NOT included in the HERs would not have to be considered of "historic, archaeological or architectural interest". Planning problems could arise from this impression.

3.3. The wording of 3.1 (h) is based on a misunderstanding of the purpose of the HERs from their inception.

3.3.1. The HERs were originally established as Sites and Monuments Records for archaeological purposes. This

archaeological record was intended to help identify where damage would be done to physical archaeological remains by development.

3.3.2. Although all the HERs used similar sources, such as the Ordnance Survey Archaeology record cards to create their first records, all four HERs have developed individual characteristics in the past four decades and they are not consistent in their content. For example, some HERs have not put emphasis on recording buildings in the past, some have put emphasis on recording place names (i.e. field names and farm names) of potential archaeological significance.

3.3.3. Importantly, it must be remembered that the HERs now reflect where archaeologists have undertaken work, not necessarily where the archaeology is to be found.

3.3.4. The HERs are evidently not comprehensive records of the Welsh archaeological resource and are best used in conjunction with other sources and original research.

3.3.5. The HERs were never intended to act as historical records and they are by their very nature not reliable as sources of historical information.

3.3.6. Similarly, they are not reliable as sources of architectural information.

3.4. To date the HERs have suffered from a degree of understaffing and uncertainty of funding which has meant that problems which are well known to HER managers and users cannot be tackled. Despite the difficulties, the Welsh HERs are a strong framework within which the heritage sector can work and grow, but an external audit of the system is greatly needed.

- 3.5. Although the HER's are periodically audited by the RCAHMW, and internally, the questions that are asked in these audits do not appear to be tackling issues such as those raised above.
- 3.6. An external audit of the HERs would fully identify the problems within each HER, including the coverage of the record to date, backlogs in updating or adding material to the HERs, and the quality of the data already recorded. We have focussed here on the issues with locational data but there are also problems with other parts of a record of a site such as site type, period and description.
- 3.7. It could also help identify the tasks which need to be undertaken to correct any deficiencies within the HERs and create a record that better presents the heritage of Wales to a wide range of interested parties.
- 3.8. At present the charges raised by the 4 Welsh HERs for commercial enquiries vary from £60 +VAT to £100 +VAT, which pays for an hour of staff time. Standardisation of the fee across the 4 HERs would be of assistance to HER users.
- 3.9. The HERs do have feedback forms, but greater consultation with HER users in all sectors, including the commercial sector, could help facilitate improvements to the system.

Comment on giving more effective protection to listed buildings and scheduled monuments

4. A Note on Scheduled Ancient Monuments

- 4.1. Trysor believe that much more attention needs to be paid to informing landowners who have Scheduled Ancient Monuments on their property as to the expectations placed upon them. An "Owner's Manual" or "Site Passport" which can

be regularly checked and updated, and transferred to new owners at a point of sale, should be considered as vital to ensure that owners will not be ignorant of their roles and responsibilities in future, reducing the potential for damage to our most important monuments. It is our experience that many landowners have a vague understanding of their role in managing Scheduled Ancient Monuments at present.

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Trysor
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