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Communities, Equality and Local Government Committee
Inquiry into the Welsh Government's Historic Environment Policy
Response from Glamorgan-Gwent Archaeological Trust Ltd

Committee Clerk
Communities, Equality, and Local Government Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA
26 June 2012

Dear Sir/Madam

Consultation: Inquiry into the Welsh Government's historic environment policy

Thank-you for your letter of the 31 May 2012 inviting us to respond to the above consultation. As requested we have set out some information about ourselves, and we have also outlined our understanding of what are the current Welsh Government policies concerning the Historic Environment before responding to your questions.

The Glamorgan-Gwent Archaeological Trust (www.ggat.org.uk)

We are one of four Welsh Archaeological Trusts working closely with other national, regional and local bodies, to help protect, record and interpret all aspects of the historic environment, and make the results available to the public.

Our stated object is to advance the education of the public in archaeology and our primary focus is within South Wales. In delivering our object our current Forward Strategy is founded on five key strategic objectives: Fostering Public Understanding; Improving Access and Engagement; Discovery and Research; Developing the Trust; Archive Care & Deposition.

We maintain the regional Historic Environment Record, and are retained by Unitary Authorities and other organisations to provide strategic advice, and also case management support where development proposals, agri-environmental, forestry and woodland schemes impact on the historic environment. We also carry out a wide variety of archaeological projects for public and private sector bodies, including environmental impact assessment, field survey, excavation and heritage interpretation. The Historic Environment Record, which has been developed over many years by the Trust, is a key charitable asset. The GGAT HER Charitable Trust holds and owns the record.

The Trust promotes knowledge and learning about the Historic Environment through digital outputs, publications, displays, leaflets, lectures and talks and enables active engagement through voluntary participation in projects.

Welsh Government Historic Environment Policy

On the Welsh Government's website the single high level Policy Statement on the Historic Environment is

'We want to make the historic environment accessible to all'

and the delivery of this is linked to the *Programme for Government*.

Cadw, the Welsh Government directorate concerned with this area have on their website the additional (expanded) policy statement

'The historic environment is central to Wales's heritage and traditions and its character contributes to our sense of place and cultural identity. It

enhances quality of life and adds to regional and local distinctiveness. It is an important economic and social asset.'

Elsewhere *Planning Policy Wales* Chapter Six sets out Welsh Government planning policies as they relate to conservation of the historic environment and these are supported by a raft of regulation and technical guidance.

The Minister for Housing, Regeneration and Heritage has issued his draft *Ministerial Priorities for the Historic Environment of Wales*. It is expected that these will inform the development of a Historic Environment Strategy and that the inquiry to which this consultation responds is part of that and other processes.

The Trust agrees and supports these policies.

It is reasonable to consider that the Welsh Archaeological Trusts are ready made vehicles for the delivery of these policies.

How appropriate and successful are the current systems employed by the Welsh Government for protecting and managing the historic environment in Wales?

The arrangements for the delivery of Historic Environment protection and management in Wales are generally much admired, and possibly envied, from within the Historic Environment sector in the United Kingdom. Whilst only a partial analysis of the Historic Environment sector in Wales, and particularly concerned with the deliveries of the Royal Commission on the Ancient and Historical Monuments of Wales, the Welsh Government sponsored 2011 Welsh Historic Environment Assessment Exercise report could observe that

'The breadth of expertise, commitment and calibre of the organisations working in the historic environment in Wales is impressive. It is a unique partnership of public and independent heritage organisations serving the Welsh people and their cultural heritage.'

The strong base shines through the report, and is perhaps also reflected in the ease with which partners have been able to agree to the establishment of more synergetic strategic management when partners are engaged in delivering related aspects of Welsh Government funded historic environment works.

The success of the system might be measured in two ways: effective delivery of statutory obligation; effective delivery of policies and related strategies. Delivery of the statutory obligation largely falls on Cadw (as a Directorate of Welsh Government) and Unitary Authorities (see our response to the final consultation question below). Delivery of policies and strategies can involve a wide range of bodies, including the Welsh Archaeological Trusts.

From a statistical perspective successive *Welsh Historic Environment Position Statements* would indicate that the statutory obligation was being successfully discharged and it may be the case that stakeholders also broadly share this perception.

Until the last Welsh Government administration there had been no overarching strategy for the Historic Environment. Indeed it could be argued that whilst individual Government bodies or Government sponsored bodies may have had their own strategies it was not necessarily clear what they were. The development of the *Welsh Historic Environment Strategic Statement* with its associated delivery programme, primarily for Cadw and the Royal Commission on the Ancient and Historical Monuments of Wales, in some cases with partners, was welcome. Not all of this was delivered, and parts continue in Cadw's own forward plans.

The sector needs clear direction founded on good partnerships. Clear, agreed, and published strategies are an appropriate mechanism. In the recent past Cadw have led this area well, and the direction of travel of the minister's advisory Historic Environment Group has given it strength and purpose.

How well do the Welsh Government's policies promote the historic environment in Wales (for instance, in terms of interpretation, accessibility, attracting new audiences and tourism)?

Currently the *policies* enable broad undertakings for the promotion of the historic environment. However, the underlying *Programme for Government* (Chapter 12 covers the Culture and Heritage of Wales) has little that is specific, and it might appear to an outsider to be of marginal concern.

The *Programme for Government Chapter 12* notes as actions the delivery by Cadw of the pan-Wales Interpretation plan, Life-long Learning Strategy, Heritage and Arts Framework and Heritage Tourism Project. It may be too early to comment on how well these particular programmes are doing as the drivers are only just starting to be delivered (Cadw's re-structuring partly reflects the forward path). The declared anticipated outputs of the Heritage Tourism Project (including 210,000 visits), if achieved, would be a fair measure of success.

Amongst the headline aims of the *Programme for Government Chapter 12* is the desire to '.....widen access to our museums, libraries and heritage sites, particularly by targeting low income families and children to access our services...' , which is obviously commensurate to the headline policy. The objective looks at access to heritage services provided by Government or Local Government but not beyond that. Interaction with the historic environment should be delivered on a far wider platform and if the parallel intention in the draft ministerial priorities (no 6) to 'foster a better appreciation of the importance of local heritage to communities and to sustainable development' is to be delivered effectively then involvement of the third sector will be crucial, and in turn it will need to be supported (no 8) and strengthened.

Programmes such as the HLF Skills for the Future Community Archaeologists Training Placement Scheme supported by the Welsh Historic Environment Sector, with placements at the Welsh Archaeological Trusts, Cadw, and the Royal Commission on the Ancient and Historical Monuments of Wales are helping to improve capacity, but there is clearly scope to deliver much more at local level. Changes to Heritage Lottery Fund priorities may enable greater participation in the future.

How well do the policies for the historic environment tie in with wider Welsh Government policy objectives (such as the regeneration of communities)?

The historic environment policies can be tied in with wider Welsh Government policy objectives. The historic environment sector is one that can be expanded for economic and social well-being benefits, and this is supported by some research. The 'accessible to all' policy should see the historic environment feed into all of the other Chapter areas of the *Programme for Government*.

However, one test is how well this is recognised by other sectors. The recent lack of reference to the Historic Environment in the Natural Resources Wales single body proposals and the *Sustaining a Living Wales – Green Paper*, were particularly worrying given the proximity of related disciplines working in the two sectors. If silo mentalities exist here, what prospect for more distant links?

What would be the advantages and disadvantages of merging the functions of the Royal Commission on the Ancient and Historical Monuments of Wales with the functions of other organisations, including Cadw?

The Royal Commission on the Ancient and Historical Monuments of Wales is established with a particular remit. It could be argued that having undertaken thousands of monument and building surveys and established a National Monuments Record within which data on these, and indeed other surveys is retained, that it either has a limitless self-perpetuating function (record deficit/shortfalls are improved through new surveys which also identify further sites and monuments requiring records), until all known and unknown monuments are fully surveyed, or has to a reasonable extent achieved its purpose, and that this could be built on by other bodies.

There is at a time of austerity an obvious attraction where two bodies are undertaking closely aligned works for Government in a single sector to merging them or devolving some functions to other bodies with appropriate capabilities to save administration costs. The roles that Cadw and the Royal Commission on the Ancient and Historical Monuments of Wales are not parallel as the former is particularly concerned with conservation, protection, management and access, whereas the latter has at the core of its remit investigation, survey and record. It is also clear from the Welsh Historic Environment Assessment Exercise User Survey that there are not serious concerns over duplication but that plurality of roles needs some clarification. Re-structuring of the sector could prove to be confusing and immediately obvious savings might be offset by longer term losses.

Cadw's function is more closely aligned to Welsh Government policies than the Commission's, although it would be worrying if it was not. On the assumption that Cadw would remain a Directorate of Welsh Government and it is on the whole better for the delivery of Welsh Government Historic Environment policies that it does, then some but not all of the investigation and survey functions could be merged, perhaps with some re-alignment. Alternatively these could be outsourced, perhaps through third sector, or commercial partners. However, in this case there would be a particular concern that the accumulated skills, knowledge and experience of the Commission's survey and investigation staff would be diluted and over time might be lost.

It is more difficult to see how, if desired, the management of the National Monuments Record could be transferred to Cadw as it contains charitable property. However, it would be feasible for the record itself to be transferred to another body with suitable charitable aims, or by the creation of a new assembly government sponsored (charitable) body. As a national archive it would be more appropriate for the record to go to a national body and the National Library of Wales or the National Museum of Wales could be possibilities. However, splitting the current functions of the Royal Commission on Ancient and Historical Monuments in Wales between different organisations would result in a reduction in the symbiosis between record/archive and survey and investigation functions in the Welsh historic environment and there is a risk that, if placed with a library that the record could 'fossilise' with little or new material being inputted. An alternative would be to look at combining the needs of maintaining an active monuments record arising from the survey of monuments and buildings with the reports and findings from investigations of such places, which would include archaeological material. There is considerable attraction in developing what would be a National Historic Environment Archive for Wales

The issues of overlap/duplication and the possible merging of records were considered in the 2011 Welsh Historic Environment Assessment Exercise. The Royal Commission on Ancient and Historical Monuments in Wales holds the National Monuments Record (NMR), the four Welsh Archaeological Trusts hold the Historic Environment Records (HERs), and Cadw holds records mostly for statutory purposes. The records serve very different purposes, and although there are some areas of overlap, overlap does not always equate with duplication. The Welsh Historic Environment Assessment exercise report recommended the integrated management of records. However, the underlying arguments of the consultants were not balanced, and in particular they gave insufficient weighting to the functional differences between the event driven HERs and their particular use in development control and the archive driven NMR. A shared record for the Principality will only be of true value if it could include all relevant records, and particularly statutory records maintained by Cadw and Unitary Authorities. The costs of achieving a meaningful merger, that would continue to allow the effective delivery of the alternative functions are likely to be at a level that would be unacceptable in the current financial climate.

What role do local authorities and third sector organisations play in implementing the Welsh Government’s historic environment policy and what support do they receive in this respect?

The local authorities in Wales have a particular role in implementing Welsh Government’s historic environment policy through the planning regime in delivering both strategic and casework (development control) planning; some maintain local museums and singly or jointly archives, libraries and other resource centres. However, outside a few archivists, museum officers, conservation officers and the odd heritage officer, the authorities possess little in the way of historic environment expertise and rely on external support, in the main provided by the Welsh Archaeological Trusts, who as charities can undertake such works provided they fall within their established objects.

In this regard we have established a Memorandum of Understanding with the twelve Unitary Authorities in the former counties of Glamorgan and Gwent that covers the provision of historic environment support in respect of Archaeological Planning Management, Historic Environment Records, and general Heritage Management advice. This might be advanced as an example of best practice.

A recent and unpublished survey of provision of historic environment officers employed in, or through, external arrangements to local government in Wales found that there are forty-eight (FTE) conservation staff directly working for Welsh Local Authorities, of whom only thirty-three are skilled trained (building) conservation specialists in permanent posts. Sixteen authorities have only one staff member who is a specialist. The Welsh Archaeological Trusts provide the full time equivalent of about eighteen historic environment *curatorial* staff (archaeological planning control, historic environment record, heritage management, including marine and agri-environment). Two national parks have their own archaeologists (one shared with one of the Trusts), and one has a recently appointed specialist on a one-year contract. Another way of looking at this is that outside of Welsh Government there is just over one specialist trained professional historic environment officer for every 50,000 persons living in Wales. If a way could be found of combining together conservation specialists, archaeological planning specialist staff and Historic Environment Record officers in several regional or sub-regional bodies, then this could lead to a more effective service.

The regional Historic Environment Record maintained by the Trust is a key tool in assisting and managing the historic environment in Wales. Comprising documents, drawings, photographs, and an increasingly important digital element, the HER is the definitive record of archaeological sites, monuments and other heritage assets in South Wales and is adopted as an official record by Unitary Authority partners. The Trust has endeavoured to place an additional layer of security around the record for present and future public benefit by placing it in a separate body (GGAT HER Charitable Trust)

Collectively the Welsh Archaeological Trusts employ more than 80 professional staff and as the key object of each Trust is to educate the public in archaeology they are closely allied to the policy of making the historic environment accessible to all and, as noted earlier, they have been working recently to develop community archaeology capacity.

The vast majority of heritage-orientated organisations in the voluntary sector are very small specialist local groups and societies, but there are some, which have national perspectives, and many contain good knowledge bases and draw in people with diverse skills. There are also one or two very large bodies such as the National Trust and Amgueddfa Cymru - National Museum of Wales, which have a critical role for assisting improved accessibility to the Historic Environment. The third sector might be given better capacity if the smaller bodies were linked up and supported through a national umbrella organisation – perhaps an equivalent to the Wales Environment Link – or regional or local equivalents, although in the latter case that would be likely to be incumbent on local authorities.

Yours faithfully

AG Marvell FSA MIfA

Chief Executive

For and on behalf of the

Glamorgan-Gwent Archaeological Trust