

# Communities, Equality and Local Government Committee

## Inquiry into the Welsh Government's Historic Environment Policy

### Response from Ancient Monuments Society

To Committee Clerk, Communities, Equality and Local Government Committee  
Please find below an email that we have written to the Minister over the RCAHMMW.

Dear Mr Lewis,

The Ancient Monuments Society is a National Amenity Society concerned with the study and protection of historic buildings of all ages and all types. We are a statutory consultee on applications for listed building consent in Wales, where there is any degree of demolition. Our sister organisation, The Friends of Friendless Churches, also run from the Vestry Hall, owns 20 listed but redundant Anglican churches in Wales.

We are alarmed at the threat to the independent future of the RCAHMMW and we urge the Welsh Government to be aware of the serious dangers and risks inherent in any such merger. We will not repeat the arguments in the Chitty Review nor those laid down in the Commission's own Operating Models Analysis - although we do find it compelling that only a matter of months ago an independent review found in favour of the independence of the RCAHMMW and that any expected financial savings would be illusory, given the Commission's present partnerships and its very modest annual budget - which at under £2m is so modest as to be, in perceptible terms, irreducible.

We wish to make three particular points:

Firstly, the RCAHMMW has a high and justified reputation. Its texts remain the standard authorities whether that be on generic matters like the Welsh Cottage, the architecture of the Welsh chapel, medieval Anglican churches or narrower fields like the country houses of Glamorganshire, the copper industry of Swansea or individual architects like John Nash (and his stay in Carmarthen) and quiet revolutionaries like Herbert Luck North, a favourite Welsh son, who never practiced outside his fastness in North Wales. The RCAHMMW extends the frontiers of scholarship and disseminates it widely, in ways that are unrivalled - and can never be done by the private sector (there are Welsh publishing houses like Seren which try but they are fragile and often dependent on formal or informal subsidy).

Secondly, the National Monuments Record is an extraordinary, unrivalled resource, exciting both because of what it holds already and because of its outgoing, dynamic character. Only a body like the RCAHMMW geared to research and fieldwork has the capacity to add to it and enrich it. Unless the sponsoring agency has that remit, the Record runs the risk of being regarded as finite - which would be a cultural disaster for Wales.

Thirdly, for those of us who love Wales but are based over the border, there is a painful sense of déjà vu. When Chris Smith was Secretary of State at the Department for Culture, Media and Sport he pushed through the merger of the English Royal Commission (RCHME) and English Heritage. A principal incentive, something that is not relevant for the contemporary debate in Wales, was the financial predicament faced by the English Commission. This argument stood alongside the familiar search for savings in shared administrative services (something addressed, in the Welsh case, in the Operating Models Analysis).

However supposed savings at the time of merger are not the end of the story. In fact it has become quite clear, irrefutably so, that an organisation, like English Heritage, when faced with the sort of order of cuts that it had thrown at it during the Comprehensive Spending Review of 2010, will find itself compelled to attack most intensively those functions that may be highly desirable but are not regarded as "frontline" or do not come with statutory underpinning. Thus we can predict with depressing certainty that if Cadw were to take over the Commission and were to seek cuts at any time in the future, it would protect, ringfence, its roles in designation, listed building consent and scheduled monument consent and properties in its care - the latter in good measure because as the Government bears its own insurance, a high standard of repair and maintenance reduces quite directly the limitless threat to the public purse that comes from uninsured liability.

When faced with the need to find 32% of cuts over 4 years, English Heritage has stated that it will have to take out up to 300 posts. The vast majority of these are in its research and outreach functions, the former precisely the area where the expertise of the RCHME was posted. The loss of corporate expertise has been huge and tragic.

What is happening in England will surely happen in Wales and the "merger" of the RCAHMW will in effect be tantamount to emasculation to the point of abolition.

Wales should be proud of its Royal Commission - an effective much respected, and lean, organisation.

All good wishes

Matthew Saunders  
Secretary

Ancient Monuments Society  
St Ann's Vestry Hall  
2 Church Entry  
London EC4V 5HB  
020 7236 3934  
[office@ancientmonumentsociety.org.uk](mailto:office@ancientmonumentsociety.org.uk)  
[www.ancientmonumentsociety.org.uk](http://www.ancientmonumentsociety.org.uk)