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# Communities, Equality and Local Government Committee

Inquiry into the Welsh Government's Historic Environment Policy Response from Headland Archaeology Ltd.

Unit 1, Premier Business Park, Faraday Road, Hereford HR4
9NZ
T 01432 364 901
F 01432 364 900
www.headlandarchaeology.com

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

The following response is produced on behalf of Headland archaeology by Andy Boucher in the capacity of Regional Manager of the Midland's and West Office. Andy has 15 years experience working at a high level on sites across Wales.

Appropriateness and success of current systems for PROTECTING and MANAGING the historic environment in Wales

#### Scheduled monuments

The role of Cadw as a part of the Welsh Assembly enables a much more rapid response to immediate threats than is the case in England. Its position as part of the statutory body enables sites to be scheduled at very short notice, sites to be investigated quickly with very little or in fact no need for liaison with multiple departments, and allows for variations to proposals that assist in protecting monuments whilst at the same time keeping the costs of related exercises to a minimum. As such any considerations for change should not involve decentralising the role of any organisation responsible for managing the historic environment, so such considerations should in our view favour retention of such an organisation within the Assembly, allowing it to retain its statutory powers.

*View – any future heritage organisation should retain statutory powers* 

#### Registered landscapes

The current register is an innovative and potentially beneficial tool for managing those portions of the historic environment so designated. It has also become widely accepted as part of the planning process and Assessments of Impact of Developments on Historic Landscapes have become common place. Initial experience of the current system demonstrated a rather "at arms length" approach from Cadw relating to this. Whilst it is appreciated that in cases where proposals are likely to be tested at public inquiry Cadw does not wish to compromise its position in such circumstances; there is a counter argument that some system for consultation with a body responsible for overseeing heritage





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might provide a more positive approach to the management of these areas (i.e. organisations proposing developments in or adjacent to those landscapes could get a good indication of likely resistance to proposals early enough to avoid committing too great an expense and being forced into a position where there is little option other than to pursue that development option – thus increasing threat to Welsh heritage).

*View – a clearer method of consultation should be built into future policies and procedures* 

## Registered parks and gardens

Whilst these were produced at the same time as the landscapes their treatment and status appears to be different to that of the Landscapes. Cadw seems to have had much more ownership of these than say the Landscapes (produced more in conjunction with Countryside Council for Wales). Consideration needs to be given to the essential settings relating to these, as when tested at inquiry it would appear that these never anticipated anything tall being built just outside of them and some clearer definition would be appropriate.

*View – review essential setting – particularly before considering statutory designation using the current format* 

## **Promotion of historic environment**

As an organisation we have not been heavily involved with this aspect of the Welsh Government's work.

# Tie in of heritage and other policies (e.g. regeneration)

In our experience there has been conflict between heritage policies and regeneration etc. In many cases this relates to sites of former industrial activity where land can be obtained cheaply by potential developers, but which contain considerable heritage value. The difficulty in these cases has been a lack of funding on behalf of the government to put in place better management of the land or powers to purchase it at reasonable prices, commonly leaving vast derelict areas of landscape with no use. Whilst not advocating wholesale destruction of these areas of industrial heritage, on the other hand there needs to be some means of securing a future of these sites or clear policies and powers that might be put in place to assist owners manage them.

*View – tie in policies should consider the future of sites* 

#### Cadw and RCAHMW possible merger

Advantages

With regard to the register on Historic Landscapes, by the nature of the manner in which these landscapes have been published there is likely to be a need to review them in the future both in terms of their extent and number (new ones may come to light). Certainly merging with RCHAMW would be beneficial here as the latter organisation has wide skills and experience in Welsh Landscapes.

The shared knowledge base in terms of maintaining databases of both designated and undesignated sites should enhance heritage protection through speeding up the means by which more valuable heritage assets might be identified for scheduling.





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There is potential with the merger of both organisations and maintenance of a central database that resources could be better targeted to provide a central HER for the whole of Wales and also centralise planning advice, such as is the case for London with English Heritage.

# Disadvantages

There is a potential risk that the fieldwork and survey roles of the Commission would end up playing second fiddle to the more statutory roles of Cadw and unless these were protected in any new governing document then they might end up being cut further down the line.

### Local authorities and third sector organisations

Currently Wales operates a system of Welsh Archaeological Trusts who receive Cadw funding to operate administrative functions. In practice it would appear that this funding is in part used to cover management and overheads relating to contracting arms of those organisations — or at least there is no way of distinguishing where one funding stream stops and the other starts. This system was established before the change in planning policies in 1991 that saw the growth and development of commercial archaeology (in its modern sense). There is a question as to whether such a system is still tenable or at least best value for money. There are plenty of organisations that could carry out the contracting side of the archaeological work, and there seems little point in funding multiple posts when, given the level of development activity in Wales, such a function might be better managed centrally.

*View – were a merger between Cadw and RCAHMW considered, centralised control of the Welsh Trust's administrative functions should also be considered.* 

Andy Boucher MIfA BSc (Hons) Regional Manager Headland Archaeology – Midlands and West