



*Archaeology for all*

**Communities Equality and Local Government  
Committee Inquiry into the Welsh Government's  
Historic Environment Policy**

**Submission by the Council for British Archaeology and  
Council for British Archaeology Wales  
Cynor Archaeoleg Brydeinig Cymru**

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*The Council for British Archaeology is an educational charity working throughout the UK to involve people in archaeology and to promote appreciation and care of the historic environment for the benefit of present and future generations. We have a statutory role as one of the national amenity societies consulted on listed building proposals in England and Wales. We have a membership of 620 heritage organisations and c.10,000 directly subscribing individuals of all ages. Our institutional members represent national, regional and local bodies encompassing state, local government, professional, academic, museum and voluntary sectors.*

*CBA Wales -Cymru is the national group which represents the CBA's UK policies in Wales. It focuses on the special needs of Wales in all aspects of archaeological understanding and conservation.*

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**Introduction**

The Council for British Archaeology (CBA) and CBA Wales-Cymru welcome the opportunity to contribute their views to the Committee's inquiry into Welsh Government's historic environment policy. This submission is made jointly on behalf of both organisations.

We are pleased to share experience of our work as a national amenity society in Wales (with a statutory role in advising on listed building casework supported by Cadw) and as charitable, voluntary sector organisations actively engaged with archaeological research, education and publication and with local community-based projects to investigate and enhance the historic environment in Wales. We are as much concerned with the archaeological interest of the built environment, landscapes and marine contexts as with archaeological sites on land.

Our joint submission aims to inform both the formulation of an historic environment strategy for Wales, leading in due course to a Welsh Heritage

Bill, and also the consideration being given to merger of the functions of the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) and other organisations including Cadw.

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

1.1 Drawing on our experience of policies and legal frameworks for protection of the archaeological heritage, we believe the current arrangements would benefit from scrutiny and improvement in the following areas:

- Harmonisation of the dual protection regime of listing and scheduling
- Protection for marine archaeology: limited implementation and scope of existing legislation and potential to use the Marine Act provisions in Welsh waters.
- Lack of enforcement powers (under 1979 Act) and poor implementation of enforcement, use of repairs notices etc by local authorities under the 1990 Act
- Interim protection for sites under consideration for designation
- Substantial penalties for offences under heritage legislations
- Review of the Class Consents Order in relation to the 1979 Act
- Better protection for undesignated archaeological landscapes and rural sites at risk from land-use change and management regimes not regulated by the planning system
- Local authority engagement with protection through the 1979 Ancient Monuments and Archaeological Areas Act is weak as it falls outside the planning process

1.2 The CBA and CBA Wales- Cymru support and commend Cadw's Conservation Principles for the sustainable management of the historic environment in Wales. We would like to see these principles embedded firmly in public policy and in reformed legislation to reflect recognition of the historic environment as a shared resource and its management to respect and better reveal the significance of heritage assets and their contexts.

1.3 The historic environment is a key national asset, and its conservation can be a driver for regeneration and a sustainable future. We would like to see this foregrounded in national planning policy. The CBA has been closely engaged with the reform of planning policy in England, from PPS5 through to the NPPF published in April and the historic environment guidance currently in draft. Parallel policies and strategy are needed in Wales, bespoke to its particular needs and character, to ensure that the significant values of Welsh heritage assets and historic landscapes are sustained for future generations to enjoy in ways that enhance, rather than inhibit, change and bring social and economic benefits for the people of Wales.

1.4 The role of the historic environment in sustainable development should be more strongly championed and explicitly supported in Government policy. Better integration with policies for the natural environment, economic growth and community identity would also strengthen the management of change in the historic environment. For example, consideration of the historic

**Council for British Archaeology**

St Mary's House, 66 Bootham, York, YO30 7BZ · t: 01904 671417 · f: 01904 671384  
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environment should be firmly included along with natural environment in the remit of the new body proposed to be formed from CCW, Forestry and Environment Agency in 'Sustaining a Living Wales'; they are equally valuable and key parts of our heritage.

**2. How well do the Welsh Government's policies promote the historic environment in Wales (in terms of interpretation, accessibility, attracting new audiences etc)?**

- 2.1 Our comments focus on Cadw's policies and strategies for promoting appreciation of, and access to, the historic environment as it is this aspect of Welsh Government policy that is best known to our organisations. Cadw has adopted innovative approaches and initiatives, for example in the Pan-Wales Interpretation Plan and its Lifelong Learning Strategy, which provide integrating frameworks with other Government initiatives for tourism and wider cultural heritage. Much of this is at too an early stage for assessing impact and effectiveness.
- 2.2 Community engagement and participative projects with local people are also supported, and in some cases delivered, by Cadw (for example its Cauldrons & Furnaces project) and are generally focussed on the 127 monuments and sites in state care in Wales. Cadw modern guide book series is highly regarded, and their *Caring For...* series of booklets are very popular. Cadw's ongoing funding and support for the HERs / Archwilio also supports a resource that is used widely by general public, local authority planners & developers. Re-enactment events at Cadw monuments also good way to reach all ages.
- 2.3 Engaging local communities with their own heritage also forms an important part of the work of CyMAL (through People's Collection Wales and other initiatives), the Welsh Archaeological Trusts (supported by Cadw), the RCAHMW (an AGSB), the Civic Trust for Wales and also the CBA's work in Wales through its HLF-funded community archaeology bursaries. Clear WG-led policy to promote effective joint working and collaboration would be welcome given the diversity of organisations and the scarcity of resources.

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

- 3.1 Our organisations are not familiar in detail with WG policies in this area. The Minister's priorities for the Welsh historic environment sector speak of fostering 'a better appreciation of the importance of local heritage to communities'. Active engagement of historic environment policies in this area could, and should, be developed in a more dynamic and creative way in collaboration with other partners in cultural and social enterprises.
- 3.2 A sense of place is an important part of the culture of Wales but this is sometimes divorced from the physical traces of past generations in the Welsh landscape. The archaeological community of Wales has a particular concern that local people are given every assistance to appreciate the evidence left by those past generations and can help to ensure that the regeneration of Welsh

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communities takes place in a way which values the past and its place in the national identity.

- 3.3 Good examples of community involvement in other policy areas, such as education, health and well-being exist in Wales though initiatives such as Communities First, and occasionally these move into heritage activities. A good example would be the work in Torfaen of the Ancient Cwmbran group who undertake community archaeology projects. This was spawned by a Communities First project which included an art group, an allotment group and collaboration with other groups focused on social disadvantage and unemployment. Other examples are the links between heritage activities and health and well-being provided by initiatives to rebuild dry stone walls, record fauna and flora and encourage people to participate in outdoor activity. Local history is frequently used as the hook to capture peoples' interest. Blaenavon World Heritage Site has recently launched a series of walks celebrating "Forgotten Landscapes" and has a programme of events to promote public participation in outdoor activity. It has been recognised for some time that engaging people in this way has benefits for physical and mental health as well the obvious education opportunities it offers.
- 3.4 In relation to environmental policies, there is room for better integration with protection of the historic environment. For example, the Glastir woodland creation scheme appears to have potentially reduced the protection of the historic environment. Previously there had been a well-established policy of no woodland expansion without archaeological consultation and Better Woodlands for Wales, the old scheme, had involved advice from the Welsh Archaeological Trusts.

**4. 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?**

- 4.1 Some of the advantages and disadvantages of options for the merging of functions were explored for the Welsh Historic Environment Assessment Exercise, presented in Appendix 1 of the report (downloadable from <http://www.rcahmw.gov.uk/media/282.pdf>), and are referred to below.
- 4.2 Experience in England, and emerging from recent review in Scotland, is that centralisation inside a Government body has dis-benefits for functions such as survey and research, digital information services, education, outreach and publication. It limits opportunity and effectiveness. Government procurement, regulation and systems place constraints on business models (e.g. enterprise to grow income streams, attract legacies and charitable giving, secure funding from academic, charitable and European programmes), on innovation and IT, on flexible partnership working, fleetness of foot to respond to business opportunities and the economies of shared facilities such as back office systems. Stronger public involvement and trust in a charitable body is also potentially a benefit of an arms-length body with charitable status. Loss of these possibilities would be a consequence of taking RCAHMW functions into Government.

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St Mary's House, 66 Bootham, York, YO30 7BZ · t: 01904 671417 · f: 01904 671384  
email: [info@britarch.ac.uk](mailto:info@britarch.ac.uk) · web: [www.britarch.ac.uk](http://www.britarch.ac.uk)

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- 4.3 In terms of designation and heritage protection there is also value in an authoritative and independent sources of expertise - outside Government - in an AGSB or charitable heritage foundation -which evaluates heritage assets, engages public opinion and awareness, sets standards, advances R&D for the sector and makes recommendations to Government, but is clearly separate from decision-making on implementation of statutory measures.
- 4.4 Merging functions within the Welsh Assembly Government would allow integration of some strategic and a number of operational activities. Effectively this would create a new operational division of the WG's heritage service in Cadw and potentially co-locate the National Monuments Record archive and information services with the National Library. The question is whether these services will be more effective, efficient and better resourced outside Government or disaggregated within it? The same question could be asked about provision of visitor and conservation services for historic properties in guardianship.

**5. 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?**

- 5.1 **Local authorities:** Our experience in Wales is that local authorities vary enormously in availability of specialist advice for the built heritage, with some having little or no resources. Only the National Parks and one other local authority have their own archaeological officers; some authorities have no dedicated conservation officer. The Welsh Archaeological Trusts provide advice on matters relating to the archaeological interest of development to all local authorities that require it. This is independent and authoritative but it is a concern that, as a consequence of this advice being out-sourced, local authorities have less sense of 'ownership' and engagement with the potential significance the archaeological heritage. The separation of in-house conservation specialists and out-sourced archaeological advice does tend to perpetuate a separation in approaches. Advice from WG on best practice would assist in countering the tendency to regard historic environment advice as a non-statutory function that has low priority and is marginal to mainstream planning. The role of local planning authorities is central to managing the historic environment and many rely on the RCAHMW, as well as the Welsh Archaeological Trusts, for information, research and specialist advice on the significance of heritage assets affected by development.
- 5.2 The CBA advises local planning authorities on listed building consent cases involving demolition or partial demolition where the archaeological interest of the case merits comment. We do this with the assistance of volunteers caseworkers across Wales. The quality of the listed building applications notified to the CBA varies widely. A significant proportion of them has wholly inadequate documentation and lacks any assessment of significance or building analysis. The effect, and sometimes even the nature and scope, of the proposed changes can be impossible to judge in such circumstances. Pre-application consultation is extremely rare in our experience. While we

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commend the Welsh Conservation Principles (above 1.2), until these are adopted and applied through planning policy there is unlikely to be progress towards appropriately documented and assessed proposals which show the impact of change on the archaeological or historic interest of heritage assets. Modernised planning policy to guide improvement in this area would be one of the most valuable measures of support for what we do.

- 5.3 As a national amenity society, the CBA receives a small annual grant from Cadw towards its casework role (above 5.1). CBA Wales-Cymru receives small publication grants from Cadw and RCAHMW to support its journal, *Archaeology in Wales*, which publishes an annual listing, with summaries, of all archaeological excavations and other fieldwork carried out in Wales
- 5.4 The CBA provides the secretariat for the Archaeology Forum which is the principal liaison group for UK-wide non-governmental organisations in archaeology, meeting regularly with representatives from Cadw. The CBA's activities in Wales include the organisation of the Festival of British Archaeology in Wales and the support of six Young Archaeologists Club branches. CBA Wales-Cymru spring and autumn meetings encourage attendance of members of the YAC club in the vicinity and encourage practical involvement of school and university students in projects run by archaeological groups and societies.
- 5.5 CBA also manages the Challenge Funding for Wales (which offers small grants for original research and contributions to archaeological knowledge) and the HLF-funded Community Archaeology placement scheme. This currently provides four fully-funded training posts for working with communities in Wales. The training programme that accompanies the scheme is supported by Cadw.
- 5.6 From a CBA Wales-Cymru perspective, local community groups are seen as essential to supporting the work of the key historic environment bodies in Wales. Without the contribution of community groups, in terms of participation and funding, much of the archaeological activity in the heritage sector would be restricted to purely developer-led activities where planning considerations dictate that a watching brief or field investigation is necessary. Much of our countryside is affected by change that takes place outside the planning system and it becomes important that issues are flagged up by community groups representing what people consider to be locally important. In many cases it is left to the community groups themselves to follow this up, carry through research and press for support.
- 5.7 CBA Wales-Cymru and the CBA both have representatives on the Historic Environment Group and CBA Wales-Cymru is an active member of Wales Environment Link. Both organisations are consulted by Cadw on Scheduled Monument Consent applications.

Council for British Archaeology  
Cyngor Archaeoleg Brydeinig Cymru, 29 June 2012

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