



# SOCIETY OF ANTIQUARIES OF LONDON

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Committee Clerk,  
Communities, Equality and Local Government Committee  
National Assembly for Wales  
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3<sup>rd</sup> July 2012

Dear Sir / Madam,

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

The Society of Antiquaries of London is a registered charity and the senior national Learned Society in Britain concerned with the study and understanding of the past. Founded in 1707, the Society of Antiquaries of London is charged by its Royal Charter of 1751 with 'the encouragement, advancement and furtherance of the study and knowledge of the antiquities and history of this and other countries'. The Society comprises an elected college of some 2,900 Fellows, drawn from scholars and practitioners working in the fields of archaeology, architectural and art history, museology, conservation and cultural resource management together with ecclesiastical, documentary and heraldic study. The Fellowship represents an extraordinary breadth of expertise and scholarship which the Society encourages and fosters for the wider public benefit.

The Society welcomes this opportunity to comment on the consultation at this early stage in the process towards the introduction of a new Heritage Bill for Wales in 2014-15. With the failure of the draft England and Wales Heritage Protection Bill, 2008, this Welsh proposal would give a renewed opportunity to update the existing legislation to respond better to current needs and priorities.

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

The Society considers that the current systems employed by the Welsh Government have served the historic environment in Wales reasonably successfully. The legislative framework, common to the UK until recent changes in Scotland, has allowed effective protection of most recognized elements of the historic environment and built heritage, though, through the years, a more sophisticated awareness of the constituent parts of that environment has led to a proliferation of protective measures – scheduling, listing, designation and non-statutory registers – that could probably benefit by simplification, as long as this is introduced without diminution of protection. While discrete sites and buildings have been quite well served by the statutory protection afforded by the current legislation, the protection of larger areas, such as historic landscapes, parks and gardens and battlefields, is less rigorous. The protection of settings of historic assets deserves strengthening and the lack of statutory protection for World Heritage Sites and their Buffer Zones also requires re-examination.

One of the main agents of destruction of sites and monuments in Wales is that of cultivation of earthwork sites and landscapes. The class consent that allows continuation of cultivation in certain

circumstances would benefit from review as, under the current regime, the condition of a significant proportion of scheduled sites is suffering. Nonetheless, present measures for management, regulation, research, recording and guidance to owners and managers of historic assets have generally proved effective and should be retained.

*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)?*

The Welsh Government through Cadw has been successful in its promotion of the historic environment in Wales and certainly its outreach and guidance has improved considerably in recent years. Cadw's interpretation on its own sites is generally good, though some less popular sites are still poorly equipped with information. Initiatives for electronic and web based information and interpretation potentially reaches wider audiences. The general public now is able to access on line the records of the main survey bodies in Wales through the Royal Commission's National Monuments Record and *Coflein*, and the Welsh Archaeological Trusts' Historic Environment Records. The promotion of community events, educational support, the funding, for example, of the Trusts' programmes of walks and talks and the support for various Local Authority initiatives have been noteworthy.

Nonetheless all bodies responsible for promotion of the historic environment are aware of the difficulties in attracting some elements of our diverse society, especially ethnic minorities. The problems of reaching out to greater audiences without condescending or resorting to the over simplification of scholarship are well known. The more popular publications produced by Cadw, the Royal Commission and the Welsh Archaeological Trusts have attracted enthusiastic response, but their success in attracting the wider audiences is unproven. Government efforts to spread knowledge and appreciation of the Welsh historic environment must continue with renewed initiatives with EU, local authorities and communities. Wales' historic environment is a real asset to tourism, with not only world famous sites and monuments but also a landscape characterized by historic features that can be promoted further for the benefit of visitors. This would require management and access agreements with owners, local authorities and third sector parties.

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

Welsh Government policy objectives cover a wide spectrum and many have a potential relevance for the historic environment. The Society notes with interest the recent inclusion of Cadw within Regeneration, Housing and Heritage department within the Welsh Government. This does imply that the contribution that the historic environment can make to regeneration policies has been recognized. The positive impact that measures for the protection of the historic environment can contribute to other policy areas such as education, tourism, health, agriculture, nature conservation and energy production must not be overlooked. In all these areas, a well-protected and managed historic environment can generate a local distinctiveness and sense of well-being can only benefit Wales as an attractive place to live and work in.

This requirement for the historic environment to play its part in regeneration must not, of course, lead to an inability of regulators to support protection of the archaeological and built heritage in its own right when policies might conflict with those of other departments.

*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?*

In 2011 the Welsh Historic Environment Assessment Exercise was undertaken at the request of the Minister for Heritage. Its purpose was to consider the roles and activities of the key historic environment bodies funded by the Welsh Assembly Government, and to identify any duplication of activities and areas for greater collaboration or a greater separation of function. The Exercise reached a number of thoughtful recommendations, and it is the Society's view that that these should be followed.

*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?*

Local authorities and National Park authorities play a vital part in implementing Welsh Government historic environment policy, particularly with regard to planning and minerals policies. Local plans with their wide cover including transport, education, tourism as well as development control have a real relevance to the protection of the historic environment. In Wales development control and the development of local plans within local authorities are supported by the Archaeological Trusts using their Historic Environment Records. The role of these HERs is of great importance and their maintenance is supported by the Royal Commission, Cadw and the local authorities. The HERs should be recognized and strengthened by inclusion within future legislation. The Archaeological Trusts play an important role in planning, education, and outreach and are supported in these activities by grant aid from Welsh Government via Cadw. Without the continuation of support, this component of historic environment policy implementation would be impossible.

Wales has very few Local Authority County Archaeologists which has resulted in fewer locally organized archaeological projects. Nonetheless the support given by Welsh Government for such projects that have been undertaken recently – such as the Heather and Hillforts project in Denbighshire, for example – is important but could usefully be extended to other large scale or community initiatives. Local Authority planning officers are an important component of the listing of historic buildings, establishment of conservation areas and repair works on historic buildings. They are supported by Welsh Government advice, grant aid and liaison provide by the Built Heritage Forum.

Third sector organizations, charities such as the National Trust and the Woodland Trust, receive grant aid from Welsh Government through Cadw for acquisition and management of historic assets. Amateur organizations, such as the Nautical Archaeology Society are supported by Cadw to undertake specialist work to the benefit of particular areas of the historic environment. Welsh Government's localism agenda may be assisted by the work of, for example, the Council for British Archaeology and the Welsh Gardens Trust and regional archaeological and historical societies. Apart from occasional assistance with publication or project grants, local societies have little support from Government, which is another topic that might be explored.

Yours faithfully,

A handwritten signature in blue ink that reads "John S C Lewis". The signature is written in a cursive, flowing style.

John S C Lewis FSA  
General Secretary  
Society of Antiquaries of London