

## SUMMARY OF RESPONSE TO CONSULTATION LETTER

1. I am very grateful to all those who wrote to me in response to the consultation exercise. This summary seeks to present a fair cross section of comments. I apologise if I inadvertently distort any correspondent's views.
2. My selection of quotations underrepresents the general calls for increased resources made by a number of correspondents.
3. Comments included in this annex are grouped broadly under the following headings:

1. **The Royal Commission's overall role and the Strategic Framework within which it operates**

- 1.(a) Should its functions be discontinued?
- 1.(b) Should it be merged with other bodies?
- 1.(c) Are there overlaps with the work of other bodies?
- 1.(d) Is ASPB status right for the Royal Commission?
- 1 (e) Does its work programme reflect its objectives?

2. **Planning and Structure**

- 2.(a) Location
- 2 (b) Planning

3. **The Royal Commission's Achievements**

4. **Areas where more activity is sought**

- 4.(i) Landscape Mapping
- 4.(ii) Historical Marine Environment
- 4.(iii) Guidance and Setting Standards
- 4.(iv) Public Profile and Public Access
- 4.(v) Increase in Understanding and Education
- 4.(vi) Copyright
- 4.(vii) Historic Buildings, including Vernacular Architecture
- 4 (viii) Funding SMRs
- 4 (ix) Other Issues

5. **Partnerships**

5. (a) Partnerships with organisations
5. (b) Partnerships with the public

6. **The Royal Commission's Relationship to the Assembly**

7. **List of Respondee**

4. Below is a list of those who responded to the consultation letter. Overall, 50 responses were received, as follows:

|                                |    |
|--------------------------------|----|
| Local Authorities              | 5  |
| Voluntary Sector Organisations | 22 |
| Other organisations            | 22 |

Respondees writing as individuals  
TOTAL

|       |
|-------|
| 5     |
| <hr/> |
| 54    |
| <hr/> |

## 1. THE ROYAL COMMISSION'S OVERALL ROLE AND THE STRATEGIC FRAMEWORK WITHIN WHICH IT OPERATES

- (a) “[Its current work programme reflects its statutory duties and functions].... in all respects but also goes further by developing the applications of modern technology to improve its functions and to extend access to its information resources.”

“Its core functions ..... in terms of protection of ancient sites, historic buildings, landscape and coastline but are also mutually complementary. The information resource which results and which the Commission maintains is ..... an invaluable educational asset.”

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth.)

- (b) “... we actually found it difficult to identify what the statutory duties and functions of the Royal Commission are. The Corporate Plan identifies a number of tasks as being *Priority 1: Statutory Obligations, including work required by the National Assembly*. These include upland survey, aerial survey, emergency building recording, data management, archive and library and reader services. We understand that the primary role of the Royal Commission is as the national body for survey and record. The extent to which the Commission fulfils this role has become increasingly limited.... “

“Under appropriate leadership, all the survey commitments on those conservation and designation-related projects currently commissioned by Cadw could be integrated into and undertaken or overseen by a better-resourced Commission, working in partnership with other archaeological bodies.”

“... the Royal Commission [seems] to have ‘lost its way’. It may be that, given the overlap of functions it shares with Cadw and its reduced role with regard to survey and record, the organisation itself is unsure of its role in the organisation of historic environment provision in Wales.”

(Institute of Field Archaeologists)

- (c) “The emergency recording of historic buildings is rightly a key role for this body of record, and the programme of dendro-dating is an important service in the interpretation of timber structures.”

(A member of the staff of Cadw)

- (d) “It is uniquely placed in Wales to provide a national overview for all periods of archaeology which neither Cadw, nor the regional archaeological Trusts are in position to do; nor, for that matter, the more object-focused NMGW.”

“The RCAHMW is possibly uniquely placed, at present, as a national creator, curator and provider of knowledge about ‘Wales built heritage, and there would be little advantage in bringing such functions under the auspices of another organisation.”

(.....?)

## 1(a) Should the Royal Commission's functions be discontinued?

- (a) "There would be a catastrophic loss of accumulated wisdom and information which provides the infrastructure for the management of historic buildings, landscapes and sites in Wales."

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

- (b) "... would have a disastrous effect on the preservation, management and presentation of the historic environment."

(Institute of Field Archaeology)

- (c) "...Without the work of the Royal Commission, there is the potential for schools to lose the access to the information should a more piecemeal arrangement be considered, for example, other bodies taking aspects of the work in the archaeology and conservation, such as local authorities, private sector organisations and so on."

(Association of Directors of Education, Wales)

- (d) "there would be no national archaeological/museums related organisation to which the archives community in Wales could relate."

(County Archivist, Gwent Record Office)

- (e) "Regardless of the organisational structure considered to be the optimum, the work of the Royal Commission is an essential part of protecting and promoting Welsh heritage."

(Director of Development, City and County of Swansea)

- (f) "..... recording of the largest body of evidence for human history in Wales would cease long prior to the stage which by any criteria it might be considered 'complete' and with minimal prospect of its continuance by other bodies. ....a national-overview and standards would cease to be available."

(Director – Resource Planning, National Museums and Galleries of Wales)

- (g) "The work of the commission is critical to the development of Wales and its identity,"

(Director (Collaborative Developments) UWIC)

- (h) "Every one of the objectives listed in Planning Policy Wales, chapter 6 Conserving the Historic Environment, section 6.1, is dependent on successful implementation of the all of the Commission's statutory duties and functions. Without such an organisation the National Assembly for Wales will find it difficult to ensure that the historic environment takes its rightful place as part of the sustainable future of Wales."

“The advantage of the commission is that it should provide an integrated service. Each of the functions could be developed but it is difficult to set out what would be gained as a result and all sense of a national body would be lost.”

(National Trust)

- (i) “The discontinuance of the Commission’s functions would result in the gradual erosion and eventual loss of much of the nation’s archaeological and built heritage without knowledge or record of it.”

(School of History and Archaeology, Cardiff University)

- (j) “All the functions carried out by the Royal Commission are essential if Wales is to have any claim to have a serious interest in the physical aspects of its history and prehistory.”

(The Gower Society)

- (k) “It is vital that the highly skilled staff, and the important corpus of archaeological records, is maintained as a unit. Staff need to be specialists and involved in current archaeology in order to interpret the data held in the record. This is of enormous importance to heritage in Wales.”

(Ynys Môn Isle of Anglesey County Council)

- (l) “A catastrophic loss of accumulated wisdom and information which provides the infrastructure for the management of historic buildings, landscapes and sites in Wales”

(Royal Historical Society)

- (m) “For research and educational purposes, the public would be severely disadvantaged, and the process of developing best practice in ..... research and recording would become impeded or lost.”

(Royal Commission Section of Prospect)

## 1(b) Should it be merged with other bodies?

- (a) “There is particular difficulty over closer links with Cadw since Cadw is the body responsible for the ‘listing’ process, with all the implications that has for owners of property, whereas the Commission is responsible for recording information on historic properties and therefore inspires confidence in its ..... non-judgmental role. Because the Commission’s role is seen as advisory and supportive to all, there is no animosity towards it. A blurring of functions between these two arms of responsibility (between the listing and the recording functions) would be detrimental to the success of the recording process. This is of particular importance in Wales, where many historic properties and buildings remain to be recorded.”

“The suggestion (in the current NLW review report) that the Commission’s archival function and services to searchers might be amalgamated with those at NLW would not be advantageous because the Commission’s informational strengths lie in the combination of its records and the accumulated expertise, knowledge and interpretational skill of its staff. Any attempt to separate the two must lead to diminution in effective function and quality of service.”

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

- (b) “There is ..... confusion caused by a perceived overlap in the roles of Cadw and the Royal Commission as funding bodies. ....both organisations grant-aid different aspects of the funding of the Sites and Monuments Records held by the Welsh Archaeological Trusts. The Royal Commission partly funds the maintenance and enhancement of the records (‘input’) where as Cadw partly funds free public access to the information (‘output’). This situation requires urgent clarification.”

“With this in mind, we would urge to National Assembly to either take steps to enable the merger of Cadw and the Royal Commission or to identify a separate, distinctive role for the Royal Commission facilitating a return to its former status as the lead body for standards in survey and record.”

(Institute of Field Archaeologists)

- (c) [The National Library for Wales] and the Royal Commission have radically different objectives and functions. Switching functions from one to another would serve only to confuse as the range of functions and services provided have grown naturally from their essentially different core purposes.”

(County Archivist, Gwent Record Office)

- (d) “Even Cadw, which at first sight might seem suitable, is best kept distinct, as the functions of the two bodies are radically different and, if merged, a loss of one of the two independent viewpoints on questions of development/destruction of sites would undoubtedly occur.”

(Director – Resource Planning, National Museums and Galleries of Wales)

- (e) “There could be economic and operational advantages to such a merger, though measures would have to be taken to clearly differentiate the roles of each section. Centralisation in Cardiff should be avoided ....”

(National Trust)

- (f) “..... on its performance over the past ten years, ..... the Royal Commission should be merged with a more broadly mandated Cadw, but not in such a way that the independence of the record arm is lost altogether.

But we are also concerned that the public should be able to seek disinterested advice from experts who are independent from the regulators. If Cadw and the Commission are merged ‘Chinese walls’ should be established between the regulatory and the survey / record functions, and separate offices should be maintained. At present Cadw are perceived primarily as regulators; we feel that they need to develop a more positive images as promoters of the historic environment, and as allies in the struggle to maintain historic buildings.”

(Committee of the Council for British Archaeology Wales)

- (g) “There is considerably synergy with parts of Cadw and an opportunity to work more closely. This could present opportunities for both organisations and a joint “public face”, albeit with different internal workings, could provide greater clarity of purposes.”

(Chair, TASC – Built and Moveable Heritage Wales)

- (h) “I suggest that the RCAHMW and Cadw be merged and the resulting body be located in Aberystwyth.”

(from an e-mail from a (named) individual, location unknown)

- (i) “The advantages of merging Cadw with the Royal Commission would clearly outweigh any disadvantages. A new, single body, responsible to one committee of the National Assembly for Wales, would allow a more coherent approach and clearer commitment to historic environment issues and concentrate precious resources for maximum benefit. As a single national body, operating with one clear voice, and a strengthened regional role for the Trusts, which are closer to their communities, there would be greater benefits to their understanding, education and promotion of the heritage of Wales, both internally to its population and externally on the world stage with more sharply defined tourism benefits. Merger could allow for the development of more cost effective and comprehensible policies, commitment and the ‘joined-up’ thinking that is required to support the work of the other environmental bodies, voluntary sector organisations and national and regional bodies involved in heritage, leisure, education, tourism, etc.”

(Director, Glamorgan Gwent Archaeological Trust Limited)



- (j) “Whilst there is a superficial similarity between the Royal Commission and Cadw, the Royal Commission has a distinctive academic role and, on many occasions, we find it the more sympathetic of the two bodies. We should be very much opposed to a merger between the two.”

(Free Church Council of Wales)

- (k) “.... scepticism as to whether it would be in the public interest to transfer the functions of the RC to other superficially similar bodies such as Cadw, CCW, NLW, etc or to merge it with any of them, bearing in mind the practical and legislative problems and the fact that personal and electronic collaboration between the RC and such bodies is already improving and should be improved further with the NAW’s new funding for the RC’s new computer platform.”

(Vice-Chancellor and Principal, The University of Wales, Aberystwyth)

- (l) “.... In England, our general impression of the impact of the merger of RCHME with English Heritage, possibly complicated by the new regional office structure, has resulted in an overall downsizing, and the loss of some of the most experienced and valuable personnel, a number of whom have been lost to private practice. .... **The VAG would be disappointed with any merger in Wales that resulted in a reduction of staffing and service levels, or the commitment to site and building analysis, which in turn might result in further reductions in the level and quality of recording of vernacular buildings.**”

(Vernacular Architecture Group)

- (m) “Many of the functions of the Royal Commission should continued to be carried out at a national or regional level. However, we see no reason for the continued existence of a separate body simply responsible for survey and record. Indeed, we feel that the continued existence of the Royal Commission as a separate organisation militates against the framing of coherent national policies, duplicates the resources expended on administration and creates unnecessary confusion in the mind of non-heritage bodies and the general public alike..... a single organisation (most appropriately based upon Cadw, whether inside or outside the National Assembly) should be charged with responsibility for developing national policies for the survey, recording, conservation and interpretation of the historic environment in Wales.”

(Clwyd Powys Archaeological Trust)

- (n) “We consider that the present degree of independence held by the Commission ensures its ability to concentrate on its functions more effectively and flexibly than if it became part of a large body with differing main priorities.”

(The Gower Society)

- (o) “While a possible merger with Cadw might suggest some potential benefits along the lines hoped for in the merger of English Heritage and the English Royal Commission, it is probably too early to pass formal judgement on this as the way forward for Cadw and the Royal Commission in Wales.”

(Director, Engineering, Institute of Civil Engineers)

- (p) “There is obviously scope for merging with Cadw: however we are concerned that the Royal Commission’s functions would become diluted or buried in some corporate ‘whole’ if it merged with the present regime, especially given our criticism of Cadw in our response to their Quinquennial Review.”

“The Royal Commission should be merged with Cadw as an Assembly Sponsored Public Body with a wider remit incorporating the protection of the historic environment and our awareness and understanding of it with sustainable development, landscape issues, good design practice, local distinctiveness etc, working closely with other bodies including the Welsh National Parks at a regional level, addressing the present resource implications between the natural and historic environment leading to a better understanding of their inseparability.”

“What is important is that in Wales there is an independent and authoritative voice for the Welsh Assembly Government archaeological and historic environment and any new combined organisation will need to have the appropriate culture and resources to achieve this.”

(Chief Executive, Pembrokeshire National Park, on behalf of the 3 National Parks)

- (q) “The invaluable work of the Commission benefits from the focus its autonomy allows it to give its educational remit, and it is for this reason that the Association does not support the merger of the Royal Commission with another body.”

(The Welsh Local Government Association)

- (r) “.....there is great benefit in having a dedicated survey and recording resource for Wales and thus no particular benefit in merging the RCAHMW.”

“If merged, or their work delivered in some other way, .... a real danger that survey and recording work – essential underpinnings for active conservation – could be seen as less important and more subservient to other .....activities.”

(Secretary, ICOMOS – UK)

- (s) “...recording and research should be separate from statutory controllers such as CADW and CCW.”

(M J Garner, on behalf of the Royal Society of Architects in Wales)

- (t) "...need for a closer involvement ..... in defining the value that [Assembly] places on the historic environment, in determining the functions that need to be served, and in creating the organisational structure that will best serve these functions..... A single national body, acting as a lead organisation, could enable the development of a strategic framework through which all partners could work together to improve the recording, understanding, conservation and enjoyment of the historic environment as part of Wales' sustainable future."

" Given a broad-ranging and unified 'lead' at national level the Archaeological Trusts could continue – as for the past 25 years – to provide services, advice and professional expertise at the regional level, where they are best placed to meet the needs of local communities."

(Dyfed Archaeological Trust)

- (u) "...particular difficulty over closer link with CADW since it is the body responsible for listing, with all the implications that has for owners of property, while the Commission is responsible for recording information on historic properties and therefore inspires confidence in its non-acquisitive and non-judgmental role. There is no animosity towards the Commission because its role is seen as advisory and supportive to all. A blurring of functions between these two arms of responsibility....would be detrimental to the success of the recording process."

"There are many common interests between the Commission and the National Library (records and information sources) and the National Museum and Galleries (archaeological artefacts, records and information), and this suggests close partnership [as opposed to merger] as the preferred arrangement."

"The Commission already cares for the records of CADW, together with its own, and is an organisation recognised as a place of deposit for public records by the PRO. It also employs a qualified, experienced archivist to manage this work, and it is entirely appropriate that the Commission's established strength in caring for records should continue...."

(Royal Historical Society)

- (v) "It might superficially seem logical to argue that the RCAHM and Cadw's listing officers do much the same thing, but in reality [they are] very different. Listing is a planning matter and is undertaken to inform that statutory process. It is concerned primarily with how interesting a building physically is at the date of listing, although the history of the building and of its owners are of course considerations. Many grade II listed buildings, though well worthy of listing, are not candidates for detailed analysis by the RCAHM, just as many unlistable buildings, on the other hand, are. This is for example because they betray some fragments of ancient building [or] generally have archaeological stories to tell, [or] which are eloquent academically to architectural historians but ..... the building may be in ruins. To muddle these two distinct disciplines together would be a disservice to both."

“In this respect, it is worth noting that whereas there will always be a minority of the property owning public who dislike the whole process of listed building control and who resent Cadw inspectors having access to buildings, the RCAHM is nearly always allowed access into every nook and cranny of buildings, because it is not regarded as part of ‘Big Brother’. The photographic archive built up in this way is completely invaluable.”

(Chair, Historic Buildings Council for Wales)

- (w) “...there would be distinct advantages for the Royal Commission to be merged with CADW, which would bring together the curator and protector of our historic monuments. However, if a merger did take place, the new organisation should have the status of an Assembly Sponsored Public Body, rather than being part of the National Assembly for Wales. In the case of a merger, it would also be important that the status of the Royal Commission duties would be protected and developed.”

(Campaign for the Protection of Rural Wales)

- (x) “It is true that the two bodies (RCAHMW and NLW) share some common features. We are both active in the general area of ‘cultural heritage’, we are both located in Aberystwyth, and the Commission does maintain some collections of documentary material, e.g. photographs, analogous to collections in the Library.”

“The differences....are more striking. The Commission is concerned primarily with the ‘immovable’ heritage and with three-dimensional cultural artifacts: these are of little or no interest to the Library. And, crucially, the Commission’s chief responsibilities, for surveying and recording monuments, and allied activities, have no equivalent in the Library. A grafting of the Commission’s functions on to the Library’s roles would not therefore necessarily lead to a thriving growth.”

“The Stage 1 report of the Quinquennial Review of the National Library (May 2002) recommends that your review should ‘give consideration to the advantages and disadvantages of merging the Commission’s archive operations with those of the Library’ (Recommendation 9, text in para. 6.29 of the report). ..... although superficially there are attractions in uniting.....collections and the functions associated with them, .....[there are]..severe practical difficulties in implementation. It would be safe to say, however, that there may be scope for closer collaboration and sharing of expertise short of merger (which could be very problematic).”

(Librarian, National Library for Wales)

- (y) “Most of the experiments in merging tried elsewhere (in England and Northern Ireland, for example), have not resulted in public advantage.”

(Royal Commission Section of Prospect)

## 1.(c) Overlaps

- (a) “There appears to be something of a duplication of the site-based information within Cadw but NMGW is not adequately aware of the extent (or non-extent) of Cadw’s site archives to be able to comment meaningfully. There is an apparent overlap between the recording work of the archaeological trusts and the RCAHMW; the ongoing integration of their archives is a crucial first step that will enable a meaningful review of their respective remits in the fullness of time.”

(Director – Resource Planning, National Museum and Galleries of Wales)

- (b) “I suggest this as there is an overlap in the work of the two present bodies as Cadw does some academic research, and the research and recording work, particularly regarding endangered buildings, of RCAHMW is used by Cadw in the listing and planning processes.”

((named) individual e-mailing from unknown location)

- (c) “... other organisations have developed significantly over the last 30 years so that Cadw, .....[has] responsibility for the protection and preservation of archaeological and historic sites and buildings ..... A number of independent ...organisations now undertake the greater part of archaeological survey and recording throughout Wales, either with the benefit of grant-aid from Cadw or the Royal Commission, or as privately-commissioned consultancy work in advance of developments of various kinds. Much of this work is undertaken by the four Welsh Archaeological Trusts, who are also recognised as the principal source of advice on archaeological and landscape heritage management for non-archaeological bodies working in Wales.”

(Gwynedd Archaeological Trust)

- (d) “There is of course some overlap with other organisations .... in publishing and disseminating knowledge but the statutory function of CADW and CCW sit unhappily with academic study. Recording in relation to a planning condition should be a planning requirement with the results lodged with the Royal Commission but the work not necessarily done by them.”

(M J Garner, on behalf of the Royal Society of Architects in Wales)

- (e) “A number of the projects currently funded by Cadw – area surveys, basic archaeological and historical research, and databasing (SMRs) appear to overlap with functions of the Royal Commission. There should be better integration of such projects and there is a strong case for the integration under one body. Given the definition of its role, we would argue that the body should be the Royal Commission.”

(Royal Commission Section of Prospect)

**1.(d) Is ASPB status right for the Royal Commission?**

- (a) “It is entirely appropriate that such official functions should be carried out by a Sponsored Public Body, especially because of their official status, their contribution to national heritage, and the extent to which they constitute a public information resource and service.”

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

### 1.(e) Does its work programme reflect its objectives?

- (a) “..... minimal survey, recording and interpretation are carried out. There is only one national survey programme, the Uplands Initiative, and contractors carry this out. The products of this programme have in certain instances been questioned by other members of the archaeological sector, suggesting that the standards employed do not match the intentions expressed.”

“The Commission is apparently lacking the resources to undertake surveys of earthworks or landscapes. It is striking that surveys of the historic environment of Wales both national and regional are undertaken by the County Trusts or individual contractors rather than the Commission and this would include projects sponsored by Cadw.”

(National Trust)

- (b) “..... during the 1970s it became clear that the survey policies and outputs of the Royal Commission were failing to address the more urgent needs of conservation and rescue archaeology. Neither the meticulous field surveys nor the paper-based records of the NMR were able to supply rapid information across the whole of Wales for planning and conservation purposes.

The deficiency was addressed in the later 1970s by the newly-formed Archaeological Trusts which, on the basis of Ordnance Survey records and the Royal Commission’s own files, rapidly created (and subsequently maintained and enhanced) regional Sites and Monuments Records (SMRs) in both mapped and computerised forms. The Trusts, at first concerned mainly with rescue excavation, later developed their own expertise in both field survey and building recording. These skills are now heavily exploited, in commissioned work, by individual developers and local authorities, as well as by Cadw for its own strategic survey projects.”

“.... The Commission, whether for reasons of policy or resources, is failing in its primary role as a recorder. There is now only limited survey, recording and interpretation of terrestrial sites, and no maritime presence at all.”

“The Commission is similarly deficient in a capacity to undertake integrated survey on earthworks and landscapes, so much so that Cadw and other bodies commissioning survey and database work now turn to the Archaeological Trusts rather than to the Commission. Currently there is only one nationally-driven survey programme with which the Commission is associated; the Uplands Initiative. This is being undertaken almost exclusively by outside contractors, and it is feared that the Commission has now so little experience of work in the field that its standard-setting and monitoring functions cannot be maintained.”

(Committee of the Council for British Archaeology Wales)

- (c) "... changes in attitudes to publication and access to information, not entirely divorced from consideration of cost, had led to a ....shift [in] the emphasis from survey, record and the production of regional inventories to the **facilitation** of survey and the maintenance of the National Monument Record as a primary function. The maintenance of the National Monument Record has, to a large extent, also become a facilitating exercise, dependent to a large extent on the periodic supply of date from the comprehensive regional Sites and Monuments Record (SMRs) records compiled and curated by the Welsh Archaeological Trusts."

(Gwynedd Archaeological Trust)

- (d) "..... the list of duties and functions covers the range of activities to which the current programmes relate, [but] there is no attempt to cover every aspect of those duties and functions."

(Royal Commission Section of Prospect)



## 2. PLANNING AND STRUCTURE

- (a) “.....[there is] a lack of strategic direction in the corporate planning of the Royal Commission which is reflected in the frequent changes to internal organisation and personnel and in the lack of a clear vision of its aims and objectives.”

“Its level of responsibility for the maintenance and enhancement of the regional Sites and Monuments Records, for example, is at best opaque. The current Royal Warrant describes it as ‘responsibility for the oversight of local Sites and Monuments Records’, the strategic objective is to create and maintain ‘a national index to the regional Sites and Monuments Records’ the Corporate Plan refers to the ‘sponsorship, through grant aid, of local Sites and Monuments Records’ whereas the Annual Report for 2000-01 refers to the grant aiding of the maintenance and enhancement of the SMRs. In practice, only 20% of the Commission’s grant aid to the SMRs is identified as being for maintenance and enhancement with the majority targeted towards tasks relating to compilation of a national index in the form of CARN, the online database. At a time when statutory status for SMRs and their evolution into fully fledged (and resourced) ‘Historic Environment Records’ are the accepted priorities in England, even limited development of the Welsh SMRs has stalled.”

(Institute of Field Archaeologists)

- (b) “The Commission makes no specific provision for regional needs, except through its partial funding of the record work of the Archaeological Trusts. The latter are now the real providers of a regional presence for survey and record work.”

(Committee of the Council for British Archaeology Wales)

- (c) “The Corporate Plan might benefit from greater consultation and [prior] discussion among staff. There is often perceived to be a gap between the ideals of the plan and the realities of its execution”.

“Many staff feel that projects giving a more holistic view of the entire historic environment and its archaeological potential could offer a clearer strategic direction. The Uplands Initiative shows the value of such projects.”

(Royal Commission Section of Prospect)

## 2(a) Location

- (a) “[The Commission reflects the needs of]... the whole of Wales. Its central location in Aberystwyth and its established record of leading collaboration between smaller units, e.g. the 4 Area Archaeological Trusts in Wales, enables it to respond very positively to specific regional needs. Of course, the Commission also serves many needs beyond the boundaries of Wales, regularly responding to enquiries from other parts of the UK and internationally at all levels, from the most scholarly to those of the interested amateur.”

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

- (b) “The structure of the organisation to enable regional needs to be fully recognised could be maximised further through partnership with local authorities to have local exhibitions using low tech publicity methods.”

(Association of the Directors of Education, Wales)

- (c) “Aberystwyth is reasonably accessible to people in both north and south, and far more accessible to people in the north than Cardiff, for example, would be. The proximity too to the National Library makes Aberystwyth a particularly suitable venue to hold the Welsh archaeological records.”

(Ynys Môn Isle of Anglesey County Council)

### 3. ACHIEVEMENTS

- (a) “.....among the Commission’s recent work was the innovative landscape mapping exercise (using GIS techniques) to assist Blaenavon’s successful bid for World Heritage Status.”

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

- (b) “The Commission’s achievements are significant, especially in its work on uplands archaeology, where there is a substantial threat from some land use practices. The Agency would urge that a greater resource be made available to archaeological investigation in Wales, which in turn would inform the Agency’s own judgements.”

(Environment Agency Wales)

- (c) “The Commission has worked hard to promote its work on a more regional level in recent years, through displays and exhibitions .....

“Improvements to the NMRW [National Monuments Record of Wales] library have, we understand, increased the number of people able to make use of this valuable resource. Increased staffing levels at the NMRW have also helped and the staff are consistently described as being extremely knowledgeable and helpful. A higher public profile, achieved through public lectures and exhibitions has also been successful.”

(Institute of Field Archaeologists)

- (d) “Its website is valued.”

(Association of Directors of Education, Wales)

- (e) In the period 1993-4, the Royal Commission ensured that the drawings of many South Wales Coalfield Colliery surface buildings were preserved and through working with the Welsh County Archivists Group were deposited in the appropriate record offices in South Wales and elsewhere. This would not have happened if the Royal Commission had not shown considerable initiative and capacity for cross domain working.

“RC staff have an esprit de corps and sense of identity with their own organisation”

(County Archivist, Gwent Record Office)

- (f) “The Commission provides an invaluable service to academic research on Chapels, as well as Wales’s other buildings and monuments. In participating in the delivery of a school of Art module devoted to the study of chapels in Wales, it is also actively encouraging the next generation of archivists and scholars”.

(Professor of Fine Art, Head of School, and Director of the Centre for Studies in the Visual Culture of Religion, Aberystwyth)

- (g) “Clearly the Commission plays an important role in helping to conserve our heritage. For example, the recent surveys undertaken by the Commission on the two engine houses at the Hafod Copper Works will assist us greatly in developing plans to conserve the site and hopefully bring it back into beneficial use. Other recent work at Penllergaer and the glasshouses in Clyne has also been valuable.”

(Director of Development, City and County of Swansea)

- (h) “It has, over the years, developed an exceptionally high standard of detailing recording of buildings, scheduled monuments, and maritime archaeology. Its publications are of the highest standards, and works such as *Houses of the Welsh Countryside* and subsequent publications have been admired and emulated (though seldom equalled) by bodies such as English Heritage.”

“.... A significant contribution to the collection of information on such diverse subjects as chapels and gardens & parklands. A number of these projects have resulted in important partnerships with bodies and organisations ranging from Capel – the Chapels Heritage Society (chapels survey); National Library of Wales, NMGW and county Records Offices (Gathering the Jewels) and the CCW (Tir Gofal). The shift in emphasis in e.g. publications has meant that the Commission’s resources have become more accessible to a much wider audience; this will undoubtedly grow and develop as more information is made available on the internet.”

(..... ? .....)

- (i) “[the]..... achievements listed are minimal when compared to the functions listed. They do not compare well to work of Cadw, the County Trusts, CCW and other organisations with responsibility for the historic environment. Considerably more could be undertaken, though we recognise that it is debatable whether this could be achieved within present resources.”

“The Commission was greatly admired for its expertise on many aspects of the landscape of Wales. The National Trust Wales is disappointed that this expertise is now severely restricted and difficult to access.”

(National Trust)

- (j) The Royal Commission has, over the years, developed accurate and detailed systems for recording buildings and industrial archaeology, including mills. Publications, such as *The Industrial Archaeology of the Montgomeryshire Canal*, which include references and drawings of mills and associated buildings, are of the highest standards.”

(Welsh Mills Society)

- (k) “In recent years the Commission and its external partners have put considerable effort into developing on-line services, such as END and CARN, and these efforts should be maintained and developed further.

The maintenance and co-ordination of air photographic cover for Wales and the rapid creation of maps from new and existing aerial photographs are areas of archaeological survey in which the Royal Commission has a special role to play.

The specialist books published in recent years by the Commission are an impressive contribution to scholarship and have also given wide access to the material in the Commission files. Such publications should be encouraged, but an independent body is not essential to produce them.”

(Committee of the Council for British Archaeology Wales)

- (l) “We welcome the involvement of the Commission in the Uplands Survey, in the chapel database, and in parklands and gardens, these being new areas of study.”

“We welcome developments in publications and outreach, especially the improved library facilities.”

(Cambrian Archaeological Association)

- (m) “[It] has an enviable backlist of significant achievements. .... high quality publication of regional and thematic surveys, which are generally technically and academically excellent. The aerial photographic and mapping work of the Commission is also important, as is the analysis of certain industrial landscapes. However, certain recent initiatives, as listed in your questionnaire, have not lived up to original high expectations.”

(Gwynedd Archaeological Trust)

- (n) “.... economic and other factors have led to changes in the format of the Inventories which were until recently the Commission’s main vehicle....., its recent publications have continued the high standards of scholarship, whilst making the results of that scholarship available in an attractive and ‘user friendly’ format to a wider range of the public. The recent publication dealing with modern artillery fortifications in the Bristol Channel is an excellent example of this.”

(Monmouthshire Antiquarian Association)

- (o) “The Royal Commission has an impressive record of research and publication, supporting its intention to provide expert advice to educational organisations at all levels. It also responds helpfully to requests for information.”

(Chief Executive, Qualifications, Curriculum and Assessment Authority for Wales)

- (p) “The excellent work of the Air-photo unit is a case in point. Particularly noteworthy is the Uplands survey, which extends to Wales co-ordinated air/ground survey methods successfully pioneered by RCHME. The post-1993 computerised catalogue system used by the air photo unit, for example, also deserves special commendation as it can cross reference to systems and site references used by both Cadw and the Archaeological trusts.”

(Ynys Môn Isle of Anglesey County Council)

- (q) “...a very favourable assessment of the relevance and quality of the Commission’s work, most especially its enquiry and information services and publications programme, and its appetite for technical innovation.

“...impressed by the Commission’s ambitions to extend its work, improve its profile and contribute to educational programmes.”

(Librarian, National Library of Wales)

- (r) “...Cadw’s high quality listing survey of Wales could hardly have reached the standards....that it has achieved without [the information in the files of the RCAHMW]. .....Accurate restorations such as the HBC so keenly strives for, are often dependent on old photographs and the National Monument Record (NMR) which the RCAHMW maintains is a vital source. At present the RCAHMW is exploiting new scientific advances and revolutionising the dating of Wales’s splendid group of early wooden buildings and historic roof structures through dendrochronology and this again will assist the HBC in determining more effectively those buildings that merit government grant aid.”

(Chair, Historic Buildings Council for Wales)

- (s) “The published volumes of Glamorgan County Inventory with their high academic standards are of inestimable value to historians at all levels providing as they do an unrivalled source of authoritative information. It must therefore be regretted that, as we understand it, no further volumes in this series will be published. “

(Glamorgan History Society)

- (t) “CPRW welcomed the opportunity to become a partner of the uplands project and is pleased to be able to contribute towards this particular initiative.

“.....the staff of the Royal Commission....particularly helpful in responding to requests for information. CPRW is particularly grateful to the Royal Commission for their assistance in providing photos of historic landscapes for use within CPRW publications and exhibitions.”

(Campaign for the Protection of Rural Wales)

- (u) “...among the Commission’s recent work was an innovative landscape mapping exercise using GIS techniques to assist Blaenavon’s successful bid for World Heritage Status. There is considerable scope to extend this work for other organisations and communities in Wales who seek to develop the historical and cultural awareness of a specific area, e.g. the development of the new National Waterfront Museum in Swansea a gateway to Wales’s industrial history.”

(Royal Historical Society)

- (v) “.....pleased that [RCAHMW] has exhibited at the Royal Welsh Show, National Eisteddfod and Urdd Eisteddfod in recent years”

(Campaign for the Protection of Rural Wales)

## **4. AREAS WHERE MORE ACTIVITY IS SOUGHT**

### **4(i) Landscape Mapping**

- (a) “..... considerable scope to extend landscape mapping for other organisations and communities in Wales who seek to develop the historical and cultural awareness of specific areas such as.... the new National Waterfront Museum in Swansea, which will provide a ‘gateway to Wales’ industrial history’ “.

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

### **4(ii) Historical Maritime Environment**

- (a) “.....lack of knowledge of the historical marine environment is significant to its work on major operations such as sea defences. The Agency would therefore welcome enhanced resources to enable the Commission to increase the profile and level of work being carried out with respect to maritime heritage.”

(Environment Agency Wales)

### **4(iii) Guidance and Setting Standards**

- (a) “Neither Cadw nor the Commission has published guidelines on standards of survey or archaeological and architectural publication comparable to those of English Heritage..... the achievements of the Royal Commission, which we acknowledge as the result of the considerable expertise and commitment of its staff, have been overshadowed by the failure of the organisation as a whole to maintain its lead role in setting and maintaining high standards for survey and record and in failing to create a clear vision for the future.”

(Institute of Field Archaeologists)

- (b) “.....one of the strengths of the Commission was the high levels of expertise available to inform planning decision and to guide national strategies. Today the Commission responds to applications for schedule monument or listed building consent with minimal information or a standard letter.”

“..... in certain instances we would look to it for advice on survey and interpretation. It is rare that we would rely entirely on guidance from the Commission..... We increasingly rely on standards set by Cadw and other organisations involved in the historic environment including ...English Heritage..”

(National Trust)

- (c) At present most pre-development desk-based and ground surveys, and environmental impact assessments are undertaken by contractors. However, it is a commonplace concern among professional archaeologists that such commissions often lack an adequate standard of monitoring.



Though currently hardly involved at all in these processes, the Royal Commission's remit clearly implies involvement in maintaining standards in this type of work. Properly resourced, there is an important role for the Commission here."

(Royal Commission Section of Prospect)

#### 4(iv) **Public Profile and Public Access**

- (a) "A regional archaeological service is provided by the Welsh Archaeological Trusts; however, public access to information created as a result of Royal Commission funding (eg upland survey and aerial survey) has been restricted at this level."

"Contractors are also specifically instructed **not** to make new information directly available to the regional Sites and Monuments Records although it is a condition of the Royal Commission grant-aid to the Sites and Monuments Records that access to the SMRs is freely available to all their contractors.

"We look forward to the completion of the chapels database but would again stress that this information is not, at present, being made available to the SMRs and, therefore, cannot inform the Development Control process, funded by Cadw through the Welsh Archaeological Trusts."

(Institute of Field Archaeologists)

- (b) "should not the various reports on buildings, landscapes etc, funded out of the public purse, be made freely available for public consultation?"

(Welsh Mines Preservation Trust)

- (c) "We note objective 7 of the Commission's programme of work which states their intentions of extending the availability of [NMR] information on-line. It should be ensured that any development in this area is available bilingually."

(From translation of Welsh Language Board's response)

- (d) "The range of services needs to be promoted more widely but this should follow with the appointment of a specialist officer. The appointment of a former Director of Education as one of the Commissioners is a positive development.....There is room to develop [its role] with more digital photographs from libraries for example and to include the catalogues on the web to share what is available."

(Association of Directors of Education, Wales)

- (e) "The RCAHMW's current programme of making information more accessible needs to be encouraged, developed and publicised so that its potential as an information provider and educational tool can be realised."

(Director – Resource Planning, NMGW)

- (f) “There is a need to ensure a wider understanding of the role of the RCAHMW. It appears to be currently doing a good job but with very limited resources and given more it could and should be able to do much better.”

(Chair, TASC – Built and Moveable Heritage Wales)

- (g) “Outside the archaeological community the Commission is virtually unknown, but does this matter? It should concentrate its publicity on those who are already interested, and not waste effort and revenue on irrelevant target populations. Even among informed people there is confusion about the Commission’s functions in relation to other archaeological bodies.”

(Cambrian Archaeological Association)

- (h) “Our view is that it supports education more constructively. In terms of information provision, it compares very well indeed with the National Library and the National Museums and Galleries of Wales. Its current Chief Executive is a member of the Committee of the Welsh Heritage Schools’ Initiative (an annual heritage and history competition for schools in Wales, supported by the National Assembly, and sponsored by a wide range of institutions and businesses in Wales). Schools taking part in this competition have often received help from the Royal Commission, either through its publications or in response to a request for information.”

(Chief Executive, Qualifications, Curriculum and Assessment Authority for Wales)

- (i) “RCAHMW could benefit by establishing a higher profile outside the specialised areas. There is possibly a lack of understanding generally of the relative roles of RCAHMW, Cadw, the National Museum and the various Archaeological Trusts and other interest groups. Some work is necessary by RCAHMW to clarify to the general public what its role is in co-ordinating work, in maintaining a comprehensive record index and archive and in the overall survey work carried out or supported. Obviously the RCAHMW is constrained by the availability of finance and this task would be of lower priority to the activities already carried out but we feel should be addressed as a need for the future.”

(Director, Engineering, Institution of Civil Engineers)

- (j) “...a fine and diverse database and a flair for presentation electronically or in printed form, the Royal Commission hides its light under a bushel. It has a lot to offer those interested in our historic heritage and could be more proactive at a less academic level in promoting it.”

(Chief Executive, Pembrokeshire National Park, on behalf of the 3 National Parks)

- (k) “There is sustained and profitable contact concerning the running of the NMRW. The managing of the current and older administrative records is hampered by lack of resources. This could have implications for the implementation of Freedom of Information and the introduction of an

electronic records management system in accordance with the Assembly's requirements under the Modernising Government/Wales Online initiative."

(Public Record Office)

- (l) "...some consideration needs to be given to the ....change to digital imaging. ....scanning [will become] more realistic; it is also our best solution for unstable , fragile and broken glass negatives."

(member of the Royal Commission's staff)

#### 4(v) **Increase in Understanding and Education**

- (a) "The Upland Survey programme has largely failed to increase our understanding of the archaeology of the Welsh Uplands. Its methodology in recent years has been reduced to a counting exercise, increasing the numbers of sites recorded but specifically excluding provision for the synthetic interpretation required to increase understanding. This has been exacerbated by the use of external contractors to carry out the work at the cheapest rates possible"

(Institute of Field Archaeologists)

- (b) The Commission also hopes to participate in the School's next international conference on behalf of the Design History Society. Members of the Commission will demonstrate the benefits and virtues of the chapel database."

(Professor John Harvey, Head of Fine Arts, Aberystwyth University, and Director of the Centre for Studies in the Visual Culture of Religion)

- (c) "In the key area of outreach, approaches to the Royal Commission have failed as [it] has not seen the value of jointly producing literature and displays that best convey the message of Wales' undoubted rich historical and archaeological past. We find this surprising in a publicly funded body."

(Director, Glamorgan Gwent Archaeological Trust Ltd)

- (d) "The extension of the Core Archaeological Record Index on-line is to be encouraged. In particular it is important for researchers who cannot easily get to a Sites and Monuments record in person (ie most researchers) to be able to access record files and reports on-line (as is possible, for example, with RCAHMS's Canmore system for Scotland). The present facilities should therefore be extended with this in mind."

(School of History and Archaeology, Cardiff University)

- (e) "More resources should be put towards individual buildings and sites, as well as producing more of the excellent publications, such as the recent volume of the Cardiganshire History and thematic studies such as the 'Brecon Forest

Tram roads' and 'Mynydd Du and Forest-Fawr'. More publications are needed at a general rather than academic level, especially given the low awareness of Wales' built heritage."

(Chief Executive, Pembrokeshire National Park, on behalf of the 3 National Parks)

- (f) "...the Association is pleased to see increased focus on educational outcomes within the Commission. We would encourage the Commission to ensure that this focus is strengthened by the creation of an education officer or team to address the enormous educational potential in this field. The Association particularly wishes to stress the possibilities which the development of ICT capability opens up for this work."

(Welsh Local Government Association)

#### 4(vi) **Copyright**

- (a) "As a publicly funded archive, the Royal Commission has a duty to ensure that any work it grant-aids is made freely available to the public. It does this through use of Crown Copyright. This has been interpreted in such a way, however, as to prevent information derived from Royal Commission sources (whether in-house or grant-aided) being made available to the public outside the NMRW, (for example, through the regional SMRs). The flexibility to remove this obstacle to wider dissemination of information would also be of benefit."

(Institute of Field Archaeologists)

- (b) "Copyright has the potential to impede the effectiveness of the RCAHM. Copyright law currently favours the RCAHM, but this is about to change.....Currently the Royal Commission is in a privileged position...."

"...If publication by RCAHM is part of the "proceedings of a Royal Commission", then publication of a copyright work does not infringe copyright and there is no need for time-consuming and thus costly copyright searching and administration. No distinction is drawn in the 1988 Act between traditional methods of publishing (eg in book form) and electronic publishing. Thus at the moment the RCAHM can publish photographs, drawings etc in books or on its web pages, regardless of who owns the copyright."

"A change in the legal position will come about through the implementation into UK law of the EU directive on the harmonisation of certain aspects of copyright and related rights in the information society (the Information Society directive)."

"Article 5 of the directive contains an exhaustive list of exceptions to copyright. A Member state need not implement all exceptions listed in Article 5, but they cannot add to the list. When the directive is implemented, section 46 of the 1988 Act, which gave the privileged position to a RC, will

have to change...The only place the [current] RC exception can fit is in an EU Article 5(3)(o). However unfortunately limited in its operation but it then goes on to state that, it provides that Member states may provide an exception.”

“..in certain other cases of minor importance ... exceptions already exist in national law..... as under section 46, the exception must “only concern analogue uses”. Analogue uses cover traditional methods of publishing eg book publishing, but not digital dissemination eg via the Web.”

“...it is important for a new RC exception to be inserted into the 1988 Act, but that it is highly unfortunate that the exception can cover only traditional publication methods and not digital dissemination. The practical consequence of this is as that as from the date of implementation of the new regulations, the RCAHM will have to acquire permission from copyright owners for electronic publication, thereby adding to costs and to the administrative burden.”

“One way around this is for RCAHM to adopt an active policy of acquiring copyright or permission to copy and to publish anything kept in its archive.”

(Allison Coleman, Law Department, University of Wales, Aberystwyth)

- (c) “The Commission’s role in effectively creating and maintaining a comprehensive archive in the form of the National Monuments Record, and (over the past ten years) a national index Sites and Monuments Records, has been sadly hampered by indecision in personnel and other matters. There have been similar difficulties in partnership involving bodies sharing these interests. Some of these relationships have been characterised by mutual distrust, and the Commission’s demands relating to copyright and ‘ownership’ have been a factor in the slow development of some partnerships.”

“Over the last decade, the Commission has been an increasingly awkward and demanding partner. For instance, matters of copyright and the timing and delivery of grant applications and monies have all presented problems which have taken a great deal of time to resolve – and some are still not resolved.”

(Committee of the Council for British Archaeology Wales)

- (d) “.... one or two obstacles in the way of completely effective partnerships with Royal Commission. These concern certain issues such as the status of other organisations as equal partners, obsessive attention on the Commission’s part to perceived issues of copyright and so on, issues which have not been a difficulty with other partners.”

(Gwynedd Archaeological Trust)

- (e) “The greatest disappointment was the failure of the Royal Commission and the Welsh Historic Gardens Trust to reach agreement on sharing a database

and this failure has led to under-valuation of the Royal Commission's database by both parties.

The issue of copyright loomed large. Most laymen, I fancy, cannot understand it and feel that knowledge should be common property. We are suspicious of the idea that it can be owned by any organisation and may have to be paid for in the future."

(Pembrokeshire Branch, Welsh Historic Gardens Trust)

- (f) The completion of the new public facilities at the Royal Commission has improved the accessibility of the collections and is warmly welcomed. There are, however, concerns regarding issues of copyright and the distribution of data and information originating from projects funded wholly or partly by Royal Commission grant aid (the Commission currently specifies that such information can only be distributed by the Royal Commission and not by the SMRs). The interpretation of Crown Copyright by the Royal Commission requires review."

(Dyfed Archaeological Trust)

#### 4(vii) **Historic Buildings, including Vernacular Architecture**

- (a) "The historic buildings of Wales would benefit from a continuous process of interpretation and analytical recording (with results appropriately publicised) as one foundation for successful conservation. This is an area where more effective partnership with Cadw (and perhaps others) would pay dividends. At present, there is a lot of untapped potential in this field (which is becoming more apparent as Cadw's resurvey of listed buildings nears completion). Although there is regular contact at senior levels between the two organisations, there are areas where collaboration is conspicuous only by its absence. .... the absence of any perceived strategic framework for such recording has perhaps acted as a disincentive."

(A member of the staff of Cadw)

- (b) "**Work on the inventories of vernacular buildings is far from complete, and sadly, much of the momentum has been lost. The VAG would welcome any initiative to reinvigorate the crucially important regional inventories of vernacular buildings.**"

**"There is an on-going need for a better general understanding of the stock of vernacular buildings through regional surveys.** Threatened building recording must be maintained, but if this can be funded through the more adequate application of local authority planning conditions, more resources may become available for the crucial regional building surveys

and inventories to continue. **By encouraging the better application of planning law, the RCAHWM might ultimately release staff and resources for the compilation of the inventories as commissioned.**”

(Vernacular Architecture Group)

- (c) “There is a need for integrated research and publication into decorative interiors, in particular early painted wall decoration. RCAHW, with access to records of existing buildings is the best body to do this..... This element of buildings is fragile, often missed and particularly at risk.”

(M J Garner, on behalf of the Royal Society of Architects in Wales)

#### 4(viii) **Funding Sites and Monuments Records and other work**

- (a) “The Royal Commission sees the creation and maintenance of the NMR as the principle way in which it curates information on the historic environment. However, much greater recognition and support is needed for the regional SMRs created and maintained by the Welsh Archaeological Trusts, and for their central role in the management and conservation of the historic environment. It is critical that these records remain based at a regional level where they are best able to serve local management needs. The importance of this cannot be stressed enough. Among other things, the regional SMRs provide the foundation on which curatorial advice is provided to the local planning authorities, they provide the basis for the research and interpretation of the Historic Environment to the public.

“However, the regional SMRs are chronically under-funded. Although some grant aid is provided by the Royal Commission, this is targeted at specific tasks and in particular the establishment of a national index. As a consequence, there are no longer adequate funds for the enhancement or even proper maintenance of the SMRs as management tools and certainly insufficient resources for the educational and outreach potential of the records to be realised.”

“The achievements of the aerial survey [programme] have been considerable. However, access to the results by other organisations has not always been easy and their use has so far been limited. In the past some restricted funding has been made available from the Royal Commission to the Welsh Archaeological Trusts for an Aerial Photography Mapping Programme. However, this programme was withdrawn several years ago in favour of in-house mapping work conducted (intermittently) by the Royal Commission itself. The amount of air photography grant money that has since been made available for active aerial survey on a regional basis is arguably too small to allow really efficient operation. Cambria Archaeology received no funding at all for aerial survey in the year 2001-02.”

(Dyfed Archaeological Trust)

#### 4(ix) **Other Issues**

##### **Welsh Language**

“... we would like to emphasise their recent efforts in the context of promoting and facilitating the use of the Welsh language. “

(From a translation of the reply of the Welsh Language Board)

##### **Resources**

“The RC appears to be understaffed, and, as a result, is not always able to respond to requests for information as quickly as it used to. “

(Welsh Mills Society)

“Royal Commission ...to have increased funds for both emergency recording and thematic projects..... books and exhibitions can [also] be very rewarding.”



(The Theatres Trust)

### **Maritime**

“The Royal Commission’s Warrant extends to the seabed and in 1994 the Commission identified itself as the lead body for compiling, maintaining and curating maritime information below the low-water mark. It has created only 251 Maritime records; the Welsh Archaeological Trusts hold more than 700 records.”

(Director, Glamorgan Gwent Archaeological Trust Ltd)

### **Historic Gardens**

“The Royal Commission identified itself as the lead body to develop and maintain a database of all historic gardens in Wales. It has created 2612 records. The database is no longer being enhanced .....”

(Director, GGAT)

### **Dendrochronology**

“Targeted, research-orientated dendrochronology offers the facility to better understand the development of vernacular buildings in Wales; it is a significant tool which warrants continuing support.”

(Vernacular Architecture Group)

### **The Planning System**

“The RCAHMW should continue to ensure that an adequate record is made of threatened buildings. However, some of this might be achieved by encouraging the better application of reasonable planning conditions which require that threatened fabric is recorded by the applicant prior to the commencement of works. Working within the framework of PPG15, independent consultants cannot pull the collected information together, providing the general background and synthesis that underpins routine recording work. Only a body such as RCAHMW, dedicated to regional or topological projects, can provide this essential overview.”

(Vernacular Architecture Group)

“.... is always so much more that can be done. The Parks and Gardens Database could be given the priority that it deserves. There is so much of our history here and much of it is being destroyed by the developers before it has been recorded.”

(Pembrokeshire Branch, Welsh Historic Gardens Trust)

“...since the advent of [Welsh Office] circular 61/96, the recording of buildings can be made a requirement of listed building and planning consents ...Welsh Archaeological Trusts, through the provision of planning advice to Local Planning Authorities, are therefore in a position to recommend that adequate building records be made. The statutory requirement to inform the Royal Commission of proposed listed building demolition is no longer the only opportunity to secure an appropriate record. .... building records are increasingly being undertaken by other ..... organisations in Wales, including the Trusts themselves. Skill and expertise in this area therefore continues to develop outside of the Royal Commission.”

(Dyfed Archaeological Trust)

(h) **Prison and Court Buildings**

“Other initiatives which have already been undertaken in England, such as recent surveys of Prison buildings and Court structures, and the publication of the results [should] be extended to Welsh examples under ....the Welsh Royal Commission.”

(Ynys Môn Isle of Anglesey County Council)

(i) **Excavation Archives**

“the NMR is considered to be .. appropriate .. for paper records whereas museums are appropriate for artefactual collections. However, the physical separation of excavation archives ..can lead to obvious problems in the ...integrity and coherence of the record. [This] is not peculiar to Wales.....a review of the Royal Commission’s archiving role with respect to excavation material is perhaps necessary.”

(Dyfed Archaeological Trust)

(j) **Local and Regional Needs**

“Under the existing system [Cadw RCAHWW – Trusts] Local Government loses out in the heritage stakes. With rare exceptions (traditionally in N and NE Wales) local needs take second place to regional needs; and this is not always appropriate. Therefore, it may be appropriate to loosen the ties between CADW and the Trusts.

(Tim Strickland, Director, Chester offices of Gilford & Partners Ltd.)

## 5. PARTNERSHIPS

### 5(a) Partnerships With Organisations

- (a) “A close connection. Staff at the Commission provide some specialist teaching for postgraduate students at University of Wales Aberystwyth , both in relation to heritage issues and record keeping.”

“It is hoped that [the need to build closer relationships] will feature in the outcome of the current consultation procedure on future structures for Archives, Museums and Libraries in Wales, and that stronger partnerships will naturally emerge. Close working relationships already exist on a UK and international basis with associated bodies with similar responsibilities (especially in Scotland and England).”

(Archives and Record Management Team, Department of Information and Library Studies, University of Wales, Aberystwyth)

- (b) “As yet, the [Environment] Agency does not have full ‘in-house’ expertise in historic environment, and is thus reliant on external expertise for guidance. EAW acknowledges the significant role that the Royal Commission plays in informing the Agency in its decision-making.”

“The delivery of on-line searchable databases via the website is a major success. It gives our staff a tool that is fundamentally useful in undertaking their duties.”

“To some extent we have been made aware of the benefits of the Royal Commission’s products via third parties. EAW wishes to strengthen its direct relationship with the Royal Commission. We consider that the effective sharing of data through compatible IS systems (especially in relation to GIS) provide a key to this. Furthermore we feel that there are probably areas of shared interest where we could collaborate through resource pooling; some form of formal liaison structure might promote this. Generally, we believe that Wales as a whole could benefit strategically from a more formal liaison structure between the bodies responsible for the historic and built environment and those responsible for the natural environment.”

(Environment Agency Wales)

- (c) “... the relationship the Commission has with some of its partners has often been problematic, largely due to issues of copyright and ‘ownership’ of information. We understand that, in some respects, this has been a result of the Commission observing the rules (particularly in relation to public funding and copyright) under which it operates. The fact that this has been potentially damaging to co-operation and partnership indicates that these rules need to be re-examined, especially as the result has been a reluctance amongst some professional and voluntary bodies to work with the Royal Commission.”

(Institute of Field Archaeologists)

- (d) “the policy of partnership with education is clear... The recent appointment of an education officer strengthens the partnership relationship.”

“...links between the Association of the Directors of Education (ADEW) is developing. Links with initial teacher training institutions (ITT) and teachers of specialist humanities subjects have the potential to capitalise more fully on the lifelong learning agenda.”

(Association of the Directors of Education, Wales)

- (e) “...the Royal Commission is positively proactive. The staff are intelligent, constructive and bridge builders. They are the only national body representing the archaeological and museum world with whom we have regular contact through the Archives Council Wales.....The Commission is always astute on how to find common ground and how to make partnerships work. This is not always the case with comparable bodies.”

(County Archivist, Gwent Record Office)

- (f) “the review presents an opportunity to consider the way in which the Commission interacts with other bodies in the fields of archaeology and conservation of the built and natural environments.”

(Director of Development, City and County of Swansea)

- (g) “The Museum’s Departments of Archaeology & Numismatics and of Historical Buildings, in particular, have a very good working relationship with the Royal Commission as seen with the recording and interpretation of St Teilo’s church which is currently being re-erected at the Museum. Similarly, the Museum of Welsh Life has worked closely with the Royal Commission on research into traditional buildings and building techniques.”

“On a formal level ..... the establishment, with NMGW and others, of the Extended National Database – CARN. ...., the commission has supported the Museum’s lead role in the Portable Antiques Recording Scheme. The Commission has developed a close and productive arrangements with specialist voluntary societies such as Capel and the Welsh Mills Society.”

(Director – Resource Planning, National Museums and Galleries of Wales)

- (h) “There is an effective understanding between The National Trust Wales and the Commission regarding [some of] its roles ....”

“The staff ...appear to have a lack of understanding and little sense of ownership.”

(National Trust)

- (i) “The WMS is frequently called upon to advise on the repair and restoration of traditional mill buildings, and the information and records available from the RC are always of the highest standard.”

(Welsh Mills Society)

- (j) “The arrival of the Welsh Archaeological Trusts on the scene in the 1970s has complicated the overall situation, since they carry out much recording work which the Commission might otherwise have undertaken, albeit in the rescue area. The Trusts’ involvement in the Sites and Monuments Record inevitably makes them partners of the Commission, while much (though not all) of their investigation work has to be negotiated with Cadw. The Trusts’ status as Registered Charities and Companies obliges them to maintain an arm’s-length relationship with statutory bodies; this was part of the arrangements made when the predecessors of Cadw initiated their formation. The Trusts are now key players, and any organisational changes affecting Cadw and the Commission would have to take them into account.”

(Cambrian Archaeological Association)

- (k) “There is an effective understanding between the Royal Commission and Capel about the role of the commission. The basis of our partnership is set out in a formal Compact which was signed in December 2000. This built on active co-operation between the two bodies which goes back to 1996.”

(Chair Capel – The Chapels Heritage Society)

- (l) “We have been very pleased with the survey of Chapels carried out by the Royal Commission and would compliment its staff on the way in which it was carried out. They were uniformly polite to the Chapel people they met and went out of their way to explain what they were doing and the historical significance of the buildings and their contents.”

(Secretary, Congregational Federation in Wales)

- (m) “.....the Royal Commission has been attempting to consolidate its own, independent position and has not integrated its work well enough with other organisations in Wales, notably Cadw, the Welsh Trusts and the Countryside Council for Wales. This has been to a detriment of a meaningful, holistic and transparent approach to the understanding, conservation and promotion of the built heritage of Wales.”

“.....concerns at the lack of discussion with the [4] Trusts concerning the new arrangements and financial provisions. [We] recommended that £128,500 was required per annum to maintain and enhance the four SMRs in Wales. However, .... the combined grant received by the four Welsh Archaeological Trusts still does not meet the 1991 recommendation of maintenance and development of the SMRs and National Monuments Record as a “*principal priority*” of the Royal Commission, which it recommended should “*find the money from its own resources, if necessary by diverting funds and staff from other activities.*”

“The failure of the Royal Commission to follow government advice, made in the best interests of the SMRs, has set the tone for a decade of poor working relationships between the Trusts and the Royal Commission.”

“The situation was further exacerbated in 1999 when the Royal Commission formally stated the change of context of its funding for the Trusts’ SMRs. Unlike the Royal Warrant (reaffirmed in July 2000) funding for the SMRs would only be provided in the context of ENDEX development – viz

*“The Royal Commission will grant-aid the maintenance and enhancement of the Trusts’ SMRs within agreed action plans, which are framed in the context of ENDEX development.”* (Paragraph 29 in Recording, Preserving and Presenting the Welsh Archaeological Landscape. A joint statement by Cadw and the Royal Commission, 1999).”

“Our concern is that this limited definition of Royal Commission funding has caused the Trust severe problems in maintaining and enhancing the regional SMRs and that there is no strategic vision for the development of the SMRs in Wales. It is disappointing that the Royal Commission as the apparent lead body has taken no positive approaches to these raised issues.”

“We suggest that consideration is given to forming a nationally agreed strategy for the holistic maintenance and enhancement of the regional SMRs. Such a strategy is needed as a matter of some urgency in Wales as the SMRs are falling behind in the forward thinking and commitment that is happening in England.”

“In 1992 Cadw also passed on its responsibilities for Aerial Photography and the Uplands Survey to the Royal Commission. This Trust currently has no involvement in these projects. With regard to the Uplands Project we are concerned with the organisation and quality of the work that is produced by the Commission and consider that this important work would benefit by reverting to a Cadw sponsored, funded and monitored project.”

(Glamorgan Gwent Archaeological Trust)

- (n) “The Commission has become rather isolated as a body involved in the recording and management of the archaeology of Wales. It attends meetings convened by Cadw, the Welsh Archaeological Trusts and CCW to discuss projects and heritage management-related matters, but is constrained from making a constructive contribution as a result of its interpretation of its remit under the Royal Warrant. It is, for example, a minor partner in Tir Gofal and the Portable Antiquities scheme.”

“.... at an institutional [rather than individual] level it is more difficult to perceive the relationship as a true partnership, for mutual benefit. Rather, as in the example of the provision, by RCAHMW, of grant-aid in support of regional Sites and Monuments Records, it has been stated that the grant is available only for outputs which enable the Royal Commission to fulfil its own remit, currently the provision of data for CARN.”

“.... much of the work on the compilations of the database of chapels and parklands and gardens records has been done by outside organisations such as ‘Capel’ and the Welsh Historic Gardens Trust, and probably would have been done irrespective of Royal Commission involvement.”

(Gwynedd Archaeological Trust)

- (o) “Our experience with working with the Royal Commission is very limited. This is a great pity and something we would very much like to see change in the future: we have very positive working relationships with the equivalent bodies in both England and Scotland and feel certain that we could also collaborate to good effect in Wales.....We would be very happy to visit the Commission to discuss possible areas of mutual interest and collaboration.”

(The Theatres Trust)

- (p) “The RC has been successful over many years in harnessing the unpaid expertise of academics from universities and allied institutions throughout Wales and beyond, and this has made it responsive to regional interests and to evolving priorities and improving standards. The central location in Aberystwyth is a workable compromise between the various regional interests.”

(Vice-Chancellor and Principal, the University of Wales, Aberystwyth)

- (q) “The VAG looks forward to playing a continuing constructive role in making the results of the Welsh Dendrochronology Project known to the widest possible readership, and would welcome its continuation by RCAHMW.”

(Vernacular Architecture Group)

- (r) “RCAHMW should be encouraged to develop partnerships with Welsh universities.”

(Cardiff University)

- (s) “Our working relationship with the Royal Commission started in 1993 with the Cadw: ICOMOS (UK), CCW joint initiative, to compile the **Register of Landscapes of Historic Interest in Wales**, ...The initiative benefited from the expertise of ... Royal Commission[staff], while copyright charges were generously waived for the majority of the ... photographs ... sourced from the Commission’s collections.”

“.....it became clear that there were other subject areas where the two organisations might explore collaboration, and in May 2000, the Commissioners, CCW Council Members, and members of staff from the two organisations met, in Bangor, to hear presentations on aspects of each other’s work, and to explore areas of collaboration.”

“...two members of staff, one from each organisation, were identified to lead on taking collaboration forward, and to devise a framework for bilateral arrangements involving teams of staff or individuals. The framework identified nine main subject areas for collaboration, namely: Cartographic and GIS facilities; Monitoring and aerial photography; Historic landscapes; Tir Gofal; *LANDMAP*; Interpretation; Data systems; Seascapes; the Cultural Atlas of Wales project.”

“We regard it as essential to continue to develop and improve our collaboration with the Royal Commission. Although the scope for doing so is limited by our different remits, areas of activity and functions, we nonetheless recognise that collaboration is intense and rewarding in the specific subject areas that we have identified.”

(Chief Executive, Countryside Council for Wales)

- (t) “Our own organisations frequently draw upon their work, publications or records. We also frequently “refer on” enquirers, both in research and educational fields, to the records of the Commission, or to their specialist staff. We have visited their offices on occasions, to consult their archaeological record and invaluable material such as Field Officers’ notebooks, as part of research projects, and found their staff helpful and knowledgeable. The Commission’s invitations to attend certain discussion forums (such as meetings on the Uplands project) are much appreciated and help to keep us in the regions in touch with their work and provide broader archaeological contexts.”

(Ynys Môn Isle of Anglesey County Council)

- (u) “....there is in reality no significant or effective discourse or exchange of information between the Parks and RCAHMW. This may be a lack of resources; it is partly due to the strong axis between Cadw, RCAHMW and the Trusts, so that bodies like the Parks and the National Trust are effectively ignored. This is in very stark contrast to the situation in England where there has been for many years a strong degree of active co-operation between the Parks and the (old) Royal Commission.”

“.... lack of effective partnership-working with relevant National Park Officers, who are ‘closer to the ground’.”

“The apparent distance between Cadw and the Royal Commission is very regrettable: a link between the Commission as a national information database on Wales’ built heritage and archaeology and Cadw with their statutory function in listing, scheduling and providing grant aid seems an obvious one. Little co-operation seems to exist between the two bodies: one example is the Cadw accelerated resurvey of chapels which could economically have been merged with the Royal Commission’s ongoing survey of Welsh Chapels. In addition, virtually no formal liaison exists between Cadw and the Royal Commission regarding the National Resurvey of Listed Buildings.”

(Chief Executive, Pembrokeshire National Park, on behalf of the 3 National Parks)

- (v) “...the size of the proposed Advisory Council should be reviewed to ensure that strategic perspectives are included and that the Librarian of the National Library of Wales and the Director of the National Museums and Galleries of Wales be appointed as ex officio members. Representation from the Royal Commission on the Ancient and Historical Monuments of Wales is also



considered significant both in terms of the third national collection (the National Monuments Record of Wales) and to represent the historic environment information sector as a whole.”

(Extract from the response of Library Information Services Council of Wales to the Welsh Assembly Government’s consultation on the options for a Welsh ‘Resource’)

(w) “[In the context of] the Commission’s stated intention;

*“to strengthen the Extended National Database partnership of CADW, National Museums and Galleries of Wales and the four Welsh Archaeological Trusts”*

...the provision of up to date, impartial, curatorial information is critical to the protection and greater understanding of our heritage in Wales. Such a service is relevant to a wide number of organisations working within the Principality and it is essential that Welsh Water amongst others has continuing access to SMR information in line with the assistance freely provided both to this and other water and sewerage companies in England via the County Archaeologists.”

“ ...recently there have been problems accessing SMR data from one of the Archaeological Trusts. This issue has caused considerable concern as the company cannot continue to meet it’s stated objectives and commitments without free and ready access to such information.”

(Head of Environment and Education, Welsh Water)

(x) “...the Royal Commission is required by law to carry out certain functions relating to its records under the guidance and supervision of the PRO. This includes managing its records in a proper manner, selecting those that are of long term value and transferring them to the PRO or a place of deposit approved by the PRO. Because of the nature of the Royal Commission’s work and specialist nature of the ensuing archive, the approved place of deposit is within the Royal Commission’s accommodation. This covers both the records contained in the NMRW’s archive and the administrative records of the Royal Commission.”

“...it is not appropriate for its records to be treated in the same way as the records of other central government organisations. The records of the NMRW are more analogous to those of English Heritage or the national museums and galleries, both in Wales and England, which hold their own records.”

“...Cadw transfers plans and registered files relating to specific sites to the NMRW to be added to the Archive. This enables the NMRW archive to have a more complete coverage of information relating to important sites within Wales.”

(Public Record Office)

- (y) “The Association.....has an effective and productive working partnership with the Commission. The relationship between the Royal Commission and other agencies appears to be constructive and positive. ....the Association is pleased to see increased emphasis on developing relationships with schools.”

(Welsh Local Government Association)

- (z) “...members in Wales [give]strong support to the way the RCAHMW currently carries out its functions. ... the Director of the Blaenavon project gives fulsome appreciation of the RCAHMW and believes that without such a ... resource, the nomination of the Blaenavon World Heritage Site would have had less intellectual integrity and the implementation of the World Heritage Site Plan have been poorer.”

(Secretary, ICOMOS-UK)

- (aa) “There is an excellent relationship between the AMB[Ancient Monuments Board for Wales] and RCAHMW. However, speaking for RSAW[Royal Society of Architects in Wales] there is likely to be less understanding amongst architects, a lack which will hopefully be addressed by increasing public awareness.”

(M J Garner, on behalf of the Royal Society of Architects in Wales, and as a member of the Ancient Monuments Board of Wales)

- (bb) “The Commission’s intention to develop a co-ordinated outreach programme within Wales is to be welcomed. Unfortunately, the Trust has not yet been involved in the development of this ‘co-ordinated’ programme despite its active involvement in outreach activities within south west Wales over the last 25 years. At a regional level the Trust is developing its own outreach strategy and copies of our initial draft strategy have been forwarded to the Royal Commission. It would help if this sort of communication were reciprocated. Clearer definitions of roles and areas of responsibility would be beneficial to ensure that there is no duplication of effort and that complementart partnerships are developed.

“There is also a need for a stronger ongoing communication and dialogue to prevent duplication and even conflict and rivalry between the various organisations responsible for the historic environment in Wales. Where there are a number of different organisations working in the same areas of activity there is often tension. Each organisation wants to demonstrate that it is the best at a particular activity. At its worst this can lead to a lack of common purpose and even secrecy while undertaking specific functions.”

(Dyfed Archaeological Trust)

- (cc) “...’Gathering the Jewels’, the all-Wales cultural digitisation programme funded by the New Opportunities Fund and led in its planning stages by the National Library. The Commission has been a leading and influential member of the Gathering the Jewels consortium from its inception in summer 1999, in the person of Hilary Malaws; it was photographs from the

Commission's collections that were chosen earlier this year for the pilot digitisation project.

"Two obvious areas of joint working would be archives, photographs and other collections, and Geographical Information Systems, where the Commission's expertise, perhaps combined with that of the National Assembly, could be of benefit in giving geographically-based access to some of our own collections."

(Librarian, National Library for Wales)

- (dd) "It is hoped that [the need to build closer connections between the Royal Commission and other bodies] will feature in the outcome of the current consultation procedure on future structures for Archives, Museums and Libraries in Wales, and that stronger partnerships will naturally emerge. Close working relationships already exist on a UK and international basis with associated bodies with similar responsibilities."

(Royal Historical Society)

- (ee) "Staff have, for some years expressed concerns at the level of communication between the Commission and some Planning Departments in relation to LBCs and the quality of advice on planning applications generally. A campaign by the Commission is needed to promote better awareness of the Commission's work amongst those responsible for advising on and those making planning decisions."

"The value of forging links with volunteer bodies has been proven by experience in the Royal Commission. However such links require adequate resourcing both in terms of finance and management."

(Royal Commission Section of Prospect)

- (ff) "In order to enhance our archive.....it would be advantageous to pursue the type of cover generated by [admired] publications such as the Pevsner volumes.... [the Commission ] could source this material by:

1. using external requests to identify inadequacies in archive cover.
2. [checking ] the quality of work we hold on major buildings....
3. [exchanging] information [with other] bodies.....gather recommendations for sites which they consider worthy of professional recording. Examples might include:
  - Cadw resurvey work
  - Planning Authority "Building at Risk" surveys
  - Tir Gofal
  - The Welsh Historic Churches Survey."

(member of Commission's staff)

**5(b): Partnerships with the Public**

- (a) “Several members been impressed by the quality of the information available, both written records and photographic collections, and by the helpfulness of staff. It was also felt that the information now available on the Commission’s website was proving most useful.”

(Chair, Flintshire Historical Society)

- (b) “..... great potential for involvement of ‘amateurs’, many of whom are extremely knowledgeable, and much fruitful collaboration could result. Such collaboration between RCAHMW and the Northern Mines Research Society enabled a book on the Frongoch Lead Mines to be published in 1996 at my suggestion, but nothing further has resulted.”

(Chair and Director Welsh Mines Presentation Trust)

- (c) “The Royal Commission has always been responsive to Gwent Record Office, and I am sure that this has been reflected in its relationships to the public.”

(County Archivist, Gwent Record Office)

- (d) “Where one could contact a member of staff who was also a friend our members have found good service from the NMR and other services and

we know that the public also receive a friendly welcome when they make personal contact. However the first impression when staff are not immediately available is often less positive since the Commission's answer phone messages do not encourage penetration behind the electronic barrier. Recent changes at Plas Crug have greatly improved physical access and the development of on-line services may help many enquiries. Nevertheless the public face of the Commission could still on occasion be more friendly."

(Committee of the Council for British Archaeology Wales)

- (e) The staff of the Royal Commission have always been most helpful to me whenever I have sought information. The library is a pleasant and user friendly place in which to work. The staff have been more than willing to assist me and I have felt encouraged and supported in my research. The evening lectures delivered by the staff have been an additional pleasure during my year.

(a resident of rural Ceredigion)

- (f) "Members of the association and the Commission have worked closely together. Commission staff have sedulously attended the Association's meetings and gladly imparted their knowledge, while Cambrians have contributed information to the Commission. Many of the Commission's staff – and the Commissioners themselves – have played roles in the leading activities of the Association. Unfortunately, in the last decade or so of the twentieth century there has been a noticeable lessening of participation. Commission staff continue to respond to requests to speak at sites, but otherwise have been little in evidence; indeed only a few of them are now members of the Association. This means that the general membership is less aware of the distinctive work of the Commission, and a public relations opportunity of a communicating with a ready-made archaeological constituency is being lost. In fairness, it should be said that this trend is not confined to the Commission but seems to affect other official bodies too, as if their staff found it somehow compromising to be associated with any group that might not always share their views."

(Cambrian Archaeological Association)

- (g) "The digital NMR still fails to reflect the Royal Commission's holdings adequately, especially for industrial sites. The NMR as a public service has been closed on several occasions as a result of staff shortages. The postal enquiry service also varies in quality, and is often subject to long delays."

(Director, Glamorgan Gwent Archaeological Trust Limited)

- (h) "... members of our own organisation have extremely good and effective relationships with individual members of RCAHMW staff on specific matters."

(Gwynedd Archaeological Trust)

- (j) “... the Royal Commission is both accessible and user-friendly both to the Welsh National Parks and to the public on a day to day basis. However, there is scope for a less specialised range of publications..... the achievements over the last 7 years are relatively modest: what is clearly missing is a greater partnership with the public. The Royal Commission is better placed than Cadw to promote our historic environment: while their publications are very scholarly, impressively produced, and highly regarded, they are often too specialised for the general public.”

(Chief Executive, Pembrokeshire National Park, on behalf of the 3 National Parks)

- (j) “There’s frequent mention of ‘Partnerships’ but nowhere is there any evidence of real and effective involvement of the Private (i.e. commercial) sector. In England, more money goes into the Heritage from this source than any other nowadays. Possibly there should be some waking up to this and the implications for the curatorial system. Outside Wales, the development fraternity view Wales as a cartel, rightly or wrongly. It looks like one. In my view (and I know I am biased), more active participation and facilitation of Private Sector involvement can only help the economy and (paradoxically) care of the Heritage.

“Those who represent the Landowners and Estate-owners consistently bemoan the lack of clarity and what they consider hidden agendas in those who represent the ‘Heritage establishment’. Is the establishment really facing up to the needs of others outside their lobby? Are social and economic needs being recognised by [CADW] and the Trusts? It seems not.”

(Tim Strickland, Director, Chester offices of Gilford & Partners Ltd.)

- (k) “...highly responsive to all approaches.”

(Royal Historical Society)

## 6. THE ROYAL COMMISSION IN RELATIONSHIP TO THE ASSEMBLY

- (a) "...its services are available to all, ready assistance is given to those who may be unfamiliar with using its facilities, remote access is easily achieved, it is active in creating partnerships, and its resources are a valuable research asset in planning sustainable development."

"The Assembly's committee structure occasionally causes difficulties in the ability of bodies to be seen as obvious partners or to be recognised as contributors to particular policies and initiatives. For example, bodies in the Culture and Heritage sector such as NMGW, NLW and the Commission may not be represented in the interests of the Education Committee. Appropriate measures to overcome such difficulties would be both helpful and productive."

(Archives and Record Management Team, University of Wales, Aberystwyth)

- (b) "..... the Royal Commission's current linkage with the Assembly provides the appropriate strategic placement for its functions."

(Environment Agency Wales)

- (c) "The aims and objectives could be aligned more closely to strategic education documents such as National Assembly's 'The Learning Country', the ELWa post 16 developments and the National Grid for Learning. So much of the resource could be digitised."

(Association of the Directors of Education, Wales)

- (d) "that the preservation of monuments naturally involves the Commission in working in some of the poorest parts of South Wales eg Blaenavon. This point can too easily be overlooked."

(County Archivist, Gwent Record Office)

- (e) "In 4.35 of The Historic Environment: A Force for Our Future we note that the DCMS states that it 'looks to English Heritage to ensure that the necessary high standards are maintained in the examination and recording sites.' Wales has a right to the same objective."

(National Trust)

- (f) "The establishment of a single national body, based upon a more broadly-mandated Cadw and incorporating, but not submerging, the functions of the Royal Commission, would offer the best means of valuing the past while also contributing to the National Assembly's vision for the future."

(Committee of the Council for British Archaeology Wales)

- (g) “.... the History Officer [of ACCAC] recently visited an infants’ school on Gurnos Estate in Merthyr Tydfil. The school had made a very detailed and impressive study of Morlais Castle in Merthyr drawing, in part, on information provided by the Royal Commission. Its work in this area certainly reflected the themes and values of tackling social disadvantage, equal opportunities, and inclusion.”

(Chief Executive, Qualifications, Curriculum and Assessment Authority for Wales)

- (h) “Both bodies [Cadw and the Royal Commission] similarly commission work in relation to the Sites and Monuments Records maintained by Welsh Archaeological Trusts. Yet, due to lack of overall policy, neither takes responsibility for ensuring that SMRs remain fit for either the development control tasks placed upon them by Planning Policy Guidance Wales or for their potentially wider role in conservation, education and tourism initiatives.”

(Clwyd Powys Archaeological Trust)

- (i) “..... the Royal Commission seems to exist in isolation from other bodies such as Cadw, CCW and the Archaeological Trusts. In general, awareness of our archaeological and built heritage in Wales is low: this is not helped by the existence of a disparate group of expert bodies rather than a championing body.”

(Chief Executive, Pembrokeshire National Parks, on behalf of the 3 National Parks)

- (j) “The economic upheavals of the early twentieth century cost Wales a swathe of its built heritage, but ignorance bred a carelessness that destroyed a lot more. The organising and updating of the NMR and other RCAHM files needs to be kept to the highest standards. With so much research being undertaken by partners that link into the RCAHM, vast amounts of information needs to be processed and correlated. The entire operation depends upon this.”

(Chair, Historic Buildings Council for Wales)

- (k) Staff are aware of the NAW’s guiding themes and values, but there is concern that if these are to be comprehensively embraced, far greater resources need to be provided. It must be recognised that if present resources are devoted to these new, public-oriented activities, there will be a consequential effect on the archaeological and investigative work being undertaken.”

(Royal Commission Section of Prospect)



## **7. LIST OF RESPONDEES**

### **Welsh Local Government Association**

#### **1. Local Authorities (5)**

Mr Craig Anderson, Director of Development, City and County of Swansea

Mr David Rimmer, County Archivist, Gwent Record Office

Ms Sioned Bowen, Corporate Director: Lifelong Learning, Denbighshire County Council

Mrs M A Aris, Principal Officer, Archives, Museum Collections & Educational Services, Ynys Mon Isle of Anglesey County Council

Mr Nic Wheeler, Chief Executive (National Park Officer), Pembrokeshire Coast National Park Authority (on behalf of the 3 National Parks)

#### **2. Voluntary Organisations (22)**

Dr Lionel Madden, Chair, Chapel – The chapels heritage society

Ms Frances Lynch, Chair, Committee of the Council for British Archaeology Wales

Dr Ruth Williams, Head of Policy and Communications, National Trust

Mr Jeremy Knight, Chair, Monmouthshire Antiquarian Association

Ms Kate Geary, Chair, Institute of Field Archaeologists

Mr Bob Meeson, President, Vernacular Architecture Group

Mr Bernard Morris, Hon Archaeology Officer, The Gower Society

Mr Gerald Hudson, Recorder, Pembrokeshire Branch, Welsh Historic Gardens Trust

Mr Gerallt Nash, Chair, Welsh Mills Society

Ms Hilary Thomas, Editor, Glamorgan History Society

Mr Gareth Dowdell, Director & Secretary of Board of Trustees, Glamorgan-Gwent Archaeological Trust

Mr Gwilym Hughes, Director, Dyfed Archaeological Trust

Mr D M T Longley, Director, Gwynedd Archaeological Trust

Bill Britnell Esq., Secretary to the Board of Trustees, Clwyd-Powys Archaeological Trust

Mr Peter Longman, Director, The Theatres Trust

Mr Peter Llewellyn, Cambrian Archaeological Association

Reverend C Gillham, Secretary, Congregational Federation in Wales

Ms Helen Mrowiec, Deputy Director, Campaign for the Protection of Rural Wales

Mr Richard Thomas, Chair, Flintshire Historical Society

Mr Peter Llewellyn, Cambrian Archaeological Society

Mr David Bick, Director, The Welsh Mines Preservation Trust

Ms Joy McCarthy, Royal Historical Society

### **3. Other Organisations (22)**

Mr Andrew Green, Librarian, National Library for Wales

Mr Roger Thomas, Chief Executive, Countryside Council for Wales

Mr Thomas Lloyd, Chair, Historic Buildings Council for Wales

Mr T J Strickland, Director, Gifford

Mr M J Garner, Garner Southall Partnership (on behalf of Royal Societies of Architects in Wales)

Dr John Bennet, Director, Engineering, The Institution of Civil Engineers

Professor D Llwyd Morgan, Public Record Office, Vice-Chancellor and Principal, The University of Wales, Aberystwyth

Mr B Nelson, Head of Environment, Welsh Water

Professor John Harvey, Professor of Fine Art, Head of School, University of Wales, Aberystwyth

Mr John V Williams, Chief Executive, Qualifications, Curriculum & Assessment Authority for Wales

Mr Mark Richards, Director – Resource Planning, National Museums and Galleries of Wales

Professor Denys Pringle and Professor Jonathan Osmond, School of History & Archaeology, Cardiff University

Ms Susan Denyer, Secretary, ICOMOS - UK

Mr Lyn Owen, Assembly Liaison Officer, Environment Agency, Wales

Mr Gwyn Jones, Chief Executive's team, Welsh Language Board

Dr John Pugh, Director [Collaborative Departments], UWIC

Dr Linda Tomos, Chair, Library and Information Services Wales (LISC)

Mr Peter Broomhead, Chair, TASC, Built and Moveable Heritage Wales

Dr Susan Davies and Ms Mary Ellis, Archives and Records Management Team,  
Department of Information and Library Services, University of Wales, Aberystwyth

Dr Alison Coleman, Law Department, University of Wales, Aberystwyth

Ms Susan Edwards, Chair, Archives Council Wales

Mr David Percival, Chair, Royal Commission Section of Prospect (a trade union)

#### **4. Individuals (5)**

A (named) individual.

A resident of rural Ceredigion

A woman who sent an email (location unknown)

An employee of Cadw

An employee of the Royal Commission