

Cynulliad Cenedlaethol Cymru / National Assembly for Wales  
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and Communications Committee  
Amgylchedd Hanesyddol / Historic Environment  
CWLC(5) HE12  
Ymateb gan Gomisiwn Brenhinol Henebion Cymru / Evidence from the Royal Commission on the Ancient and Historical Monuments of Wales

**The Royal Commission:** The Royal Commission on the Ancient and Historical Monuments of Wales is the research and development arm for the historic environment in Wales. The fieldwork that we undertake and the records that we curate in the National Monuments Record of Wales together constitute the evidence base for our understanding of the archaeological, built and maritime heritage of Wales, for the policy decisions taken by national and local government, planning authorities, businesses, investors and developers and for the research undertaken by academics, students and members of the public.

The Royal Commission is based in Aberystwyth and is sponsored by the Welsh Government, which contributes some £1.5m a year to our budget. The Chairman and Commissioners are appointed by the Crown to direct the work of the Commission's 30 expert staff, who are engaged in field research, curatorial and public engagement activity.

## 1. Questions about heritage protection in Wales:

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- Implementation of the Historic Environment (Wales) Act 2016;
- Protection for listed buildings and scheduled monuments;
- Protection for buildings and monuments at risk.

**Progressive legislation:** The passage into law of the Wales Historic Environment (Wales) Act 2016 has put Wales in the vanguard of heritage protection. Wales can be proud of having what is arguably the world's most progressive heritage protection legislation. Among provisions specific to Wales are state-funded HERs (Historic Environment Registers) for use by local authorities in exercising their planning and development control responsibilities and measures to protect place-names and historical parks and gardens.

**Practice guidance:** It has inevitably taken time for the Act's legal provisions to be turned into practice guidance. Cadw has faced a substantial task of drafting numerous documents, consulting the sector, taking in revisions and publishing the results. The Royal Commission has played an active role in this process, especially in the preparation of guidance on conservation area appraisal and management.

The Commission has also been asked by Cadw to write guidance for conservation and planning officers reminding them of the scope they have to ask developers to pay for the recording of historic buildings as a condition of listed building consent. If there is one area where we still feel concern at the lack of an agreed strategy (see below) and best-practice guidance, it is in the field of maritime archaeology, where the marine resource is under pressure from aggregates extraction and plans for windfarms and tidal barriers.

There have been many positive aspects to the consultation process: one is that the sector has helped improve the original drafts by responding with practical suggestions for ensuring that the guidance is workable; another is the way that help has come from beyond the sector – there has been much goodwill and co-operation from colleagues who work in planning and environmental functions, for example.

**Protection for historic place-names:** Another area in which progress has been swift and positive is in the creation of a register of historic place-names as required by Section 34 of the Historic Environment (Wales) Act 2016. The task of creating the register was delegated by Cadw to the Royal Commission; we convened an advisory group of all the stakeholders, including the Welsh Archaeological Trusts, Welsh Place-Name Society, National Library of Wales and Centre for Advanced Welsh and Celtic Studies. The List was launched by Cabinet Secretary Ken Skates on 8 May 2017 with an initial list of some 350,000 names (expected to grow significantly) identified from sources that predate the First World War. The List now provides easy access to a single centralised source of information on historic place names and has been welcomed by public and professional users, such as local authorities and Government Departments in Wales faced with making decisions about proposed name changes or new names in Wales.

**The need for a strategic plan:** While it is too soon to assess how well the Historic Environment (Wales) Act 2016 is working, and what sort of impact it has had, it is clear that, despite the Act, Wales lacks an agreed historic environment strategy. The state heritage agencies in England (Historic England) and Scotland (Historic Environment Scotland, or HES) both have strategic plans setting out agreed objectives for the sector for the next five years: Wales has yet to produce one. In addition, though the Act makes provision for an Advisory Board whose members are to be entrusted with acting as the Cabinet Secretary's watchdog and advisor on heritage protection, it is not clear that any moves have been taken yet to constitute

such a body. It is to be hoped that once the options for Cadw's future have been considered and settled, attention will turn to the creation of an Advisory Board.

**Systematic designation:** A core part of the English and Scottish historic environment protection strategy is their systematic approach to designation. Members of the CWLC committee may well recall stories in the media about the most recent list to emerge from Historic England's designation activity – the range of properties added to the heritage assets register in 2017 included Underhill House, in West Yorkshire, the first modern earth-sheltered house in Britain, the Cabman's Shelter in Grosvenor Gardens, London, and the buildings that form the entrance to Willesden Jewish Cemetery, London. These listings result from annual heritage asset surveys that include a thematic element – in recent years Historic England has surveyed railway structures, buildings associated with Lesbian Gay Bisexual Transgender and Queer heritage, Brutalist and post-war architecture.

Wales does not have any such programme of systematic assessment, survey and evaluation. The Royal Society of Architects in Wales has been particularly critical of the lack of a survey of 20<sup>th</sup>-century buildings in Wales or any attempt to assess which buildings should be afforded protection through listing. Cadw admits that listing activity in Wales has been reactive, rather than pro-active, for the last decade or so, based on spot-listing applications made by members of the public concerned at the potential loss of a valued building. These spot-listing applications are rarely successful.

We believe that systematic thematic survey is essential if the best and most significant buildings and monuments in Wales are to be given a measure of protection. The remit of the Royal Commission is to undertake exactly this kind of survey, but the lack of resources is a considerable restraint on our ability to help Cadw undertake a pro-active approach to listing. We have successfully completed major, definitive surveys of historic chapels and of upland archaeology; we are currently engaged in surveys of historic parks and gardens and of the impacts of climate change on coastal heritage, but recent budget cuts have severely reduced our capacity and we are unable at present to undertake the surveys of those categories of buildings that are most under threat, including historic farmsteads and 19<sup>th</sup> and 20<sup>th</sup> century places of worship.

**Heritage at risk:** The identification of farmsteads and post-medieval places of worship as categories of building most at risk has come from analysis of the database of buildings and monuments at risk maintained by Cadw. Cadw also

undertakes a regular 'condition' survey of listed buildings and monuments. The task of taking steps to resolve the problems of neglect is delegated to local authorities, all of whom are encouraged to maintain their own local risk registers (there is something of a conflict of interest here in that a significant proportion of buildings at risk in Wales are in local authority ownership).

It is not clear to what degree the results of the condition survey are being used to intervene and to encourage owners to repair or protect the buildings that are identified as being at risk. This may be because Cadw and local authority conservation staff are aware that there are no easy answers, but neglected and endangered buildings are not just a heritage issue: they represent a blight that has an impact on the well-being of residents and visitors. Questions need to be asked about whether Wales is as active in regeneration as other parts of the UK, and if not why not?

**Training and communication:** Finally, issuing guidance and providing funding, though excellent in themselves, will not make a difference without a major effort to communicate the Act's provisions, explain them to elected members and local authority employees, and ensure that developers and others are aware of what is required by the Act. For a model for how to do this, Wales might adapt aspects of the HELM (Historic Environment Local Management) programme operated by Historic England, which offers training for local authority staff and members on a range of historic environment topics.

**Underfunding:** The comments made above are not intended as criticism of Cadw. Instead their purpose is to draw attention to the underlying irony that while Wales has progressive heritage protection legislation, the sector lacks a clear strategy and is underfunded to the extent that it cannot carry out some of the fundamental tasks, such as listing, that a state heritage agency exists to perform.

Cadw is not alone in lacking adequate funds. Whilst Cadw and Welsh Government are responsible for setting historic environment policy and strategic direction, the implementation of this guidance falls on a number of other bodies, including the Royal Commission (field recording and curation of the National Monuments Record of Wales), local authorities (planning strategy, development control, conservation area management) and the Welsh Archaeological Trusts (management of Historic Environment Records and mitigation work once planning permission has been granted).

All of these organisations are struggling to perform their core functions and are underfunded for the scale of the tasks with which they have been entrusted. And while the annual budget is largely committed to core functions, there is no allowance in our budgets for investment in the future. The Royal Commission has made strenuous efforts to raise funding from non-governmental sources, and has been conspicuously successful in winning major grants from such bodies as the European Union Inter-Reg Fund, the Heritage Lottery Fund, and the Arts and Humanities Research Council. Success in this field levers in additional funding for projects that we wish to undertake, but does not allow for vital investment in infrastructure.

**Succession planning and IT infrastructure:** Two areas of underfunding are of particular concern to the Commission and to the sector as a whole: keeping pace with technological developments and succession planning. These are of particular concern to Commissioners because our platform for managing information in the National Monuments Record will need considerable investment to keep pace with digital archive requirements if we are to continue to provide the service that the public expects in the years to come.

The other area that is becoming critical is the lack of scope for succession, the lack of opportunities for on-the-job training, the lack of skills transfer and continuity. On the rare occasions when jobs are advertised, there is no shortage of applicants – but there is a severe shortage of applicants who have the necessary experience to replace the highly experienced staff who have retired or moved on. Ideally the sector should be offering apprenticeships and training programmes, but to do so requires funds that we do not have.

## 2. Questions about the 'Historic Wales' proposals for increasing income and encouraging greater collaboration between Cadw, the National Library, National Museum and Royal Commission:

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- Facilitating collaboration within the sector;
- Maximising the value of heritage tourism and Cadw's work to meet its income generation targets;
- Collaboration with heritage assets in the private sector;
- Cadw's future status.

**Strategic partnership:** The Royal Commission has played a leading role in the deliberations over the ‘Historic Wales’ proposals, and the Commission’s Secretary has been elected joint chair (with Gareth Howells of the Prospect union) of the strategic partnership that has emerged as a result.

The strategic partnership brings the four state-funded heritage agencies in Wales (Cadw, the National Museum, the National Library and the Royal Commission) together, along with officials of the three staff unions. At the first two meetings, topics identified for closer collaboration and joint endeavour include a sector skills strategy, catering and retailing strategy, the marketing of intellectual property rights, the development of a bi-lingual e-commerce platform and the development of an integrated tourism offer (an All-Wales Heritage Pass).

**Are we part of the tourism sector?** It is worth stressing at this stage that two of the four institutions concerned (the National Library and the Royal Commission) are not part of the tourist industry, and that their activities and relationships have a closer affinity with the education sector. The search rooms at the Library and Royal Commission are places of study and research, and our closest partnerships are with universities.

Equally, tourism is only part of what the National Museum and Cadw exist to do: research and learning also plays a major part in their activities, and Cadw has a very substantial role as the Welsh Government’s historic environment policy and advisory service (Cadw thus combines the functions that in England are now performed by two separate organisations: the customer-facing functions of English Heritage and the policy and planning functions of Historic England).

Having said that, Cadw and the National Museum run visitor attractions that are core to Wales’s tourism offer. On various occasions it has been said that Wales lags behind similarly sized nations in its performance as a tourism destination (most recently, the BBC ‘Wish You Were Here’ programme broadcast on 11 July 2017 made much of the differences between Welsh and Scottish tourism policy, to the detriment of Wales) but hard facts are difficult to find. We understand that the Cabinet Secretary has commissioned a report from Simon Thurley, former Chief Executive of English Heritage, specifically to benchmark the performance of the National Museum against similar institutions elsewhere and we look forward to seeing the results of that exercise, which may well help us all to understand the issues better.

**Our vision:** Whatever the outcome, there is no lack of vision on the part of the sector or on the part of the members of the Historic Wales strategic partnership. We are passionate about the Welsh historic (and natural) environment and aspire to clarity of branding and a better experience for all visitors to Wales. We believe we have world-class visitor attractions that could be on the 'must-see' lists of people travelling to the UK from other parts of the world. We wish to work more closely with other tourism providers so as to offer a rich range of choice and encourage people who come to Wales for one activity, such as a concert or a rugby match, prolong their stay to do something else, such as visiting a castle or museum, or to make frequent return visits.

We want to offer experiential travel – travel that enriches and changes lives. We want our museum and Cadw shops and restaurants to become destinations in their own right – places that people go for Sunday lunch or tea, or to buy presents for family and friends, places that promote the best of Welsh crafts and Welsh food. We want to add value to Cadw membership and to build Cadw's magazine into a broad heritage sector publication that attracts substantial advertising revenue as well as promoting cultural tourism in Wales. We want to build a healthy faith tourism and pilgrimage sector and encourage visits from the millions of people around the world who self-identify as Welsh in origin.

**Investment and leadership:** Whether this vision can be delivered depends on a number of factors. At present the sector is staffed with people who have curatorial, archival or historic environment expertise. We lack, and need to invest in, people with skills in business planning, fund-raising and sponsorship, travel-trade marketing, catering and retail. Co-operation needs to go beyond the four current participants in the Historic Wales strategic partnership to embrace all those bodies with a stake in Welsh tourism, including Natural Resources Wales, Visit Wales, the National Trust, and the Historic Houses Association. A development budget is essential to support the vision and so is vigorous and inspiring leadership.

**Options for Cadw's future:** Much will also depend on whether or not a way can be found to enable Cadw to become more commercially agile. Cadw is both an operator of heritage visitor attractions and the state heritage agency. The two functions have been separated out in England to create two new bodies, whereas in Scotland they have been kept in one organisation. Cadw is probably too small to split, and to do so would involve duplication of functions as well as losing the vital synergies that exist between the different parts of the organisation.

We await with interest the results of Kate Clark's report into the options for Cadw, but we believe that keeping Cadw intact would seem to be the best option. That probably means staying close to Government in some form: if so, Cadw needs to be free to be more entrepreneurial and commercial, which means that current constraints on recruitment, procurement, budgeting and succession planning all need to be addressed. More public accountability is also crucial; in former years Cadw published annual reports of its performance. And, amazingly, the public are largely still unaware that Cadw is actually a department of Welsh Government.

Questions about the degree to which the heritage sector is contributing to Welsh Government social objectives:

**Delivery of Baroness Andrews' Culture and Poverty report:** This is another area in which the sector has no lack of ambition but lacks resources to carry out proven schemes.

Possibly the main lesson that the heritage sector as a whole has learned from the last two years of trying to respond to the Andrews Report is that social services and local authority employees act as gatekeepers to the under-represented groups and hard-to-reach individuals that we could help. These gatekeepers are often sceptical about whether heritage and culture have anything relevant to offer them or their clients. Much work has had to go into winning their hearts and minds over the last three years.

Where we have been able to overcome this hurdle, it is usually because somebody in a local authority has approached a heritage body with a specific idea or proposal that has then been developed and delivered jointly. We struggle to devise relevant projects without their participation, and even when we do work together, you need substantial resources to be able to respond effectively, the outcomes are uncertain and the numbers of people helped can be very small.

**In sum, we would like to see:**

- raising the priority given to the historic environment in Government planning and reversing the damaging cuts of recent years to enable Cadw, the Royal Commission, the National Museum and National Library to carry out their core functions and make the most of the opportunities presented by the Historic Environment (Wales) Act 2016;



- an Advisory Board established to act as a watchdog on behalf on the Welsh historic environment and to advise the Cabinet Secretary on policy;
- a strategic plan for the historic environment sector in Wales and a more proactive approach to designation;
- addressing the brakes on enterprise that constrain the sector, including annual budgets, and strict government policies on procurement and recruitment;
- investment in succession planning and IT infrastructure;
- investment in tourism, marketing and fundraising skills;
- closer co-operation between the different parts of the cultural tourism sector and a clear focus on improving the experience of visitors to Wales, making our sites, monuments and museums better to visit and more profitable.