



From the Chairman : Frances Lynch :Halfway House, Halfway Bridge, Bangor, Gwynedd LL57 3DG

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Dear Mr Rolph,

I am making this reply on behalf of the Committee of the Council for British Archaeology Wales/Cymru which has discussed your enquiry into the **future of the Royal Commission on Ancient and Historical Monuments of Wales**. We felt that the opportunity which you gave us to meet you to discuss the issues relating to your review of Cadw was very worthwhile and we hope that we might be offered a similar opportunity in this review.

Introduction

In the past the Royal Commission had a clearly defined role in survey and research relating to ancient monuments and historic buildings, a role which had a much respected output in the publication of the County Inventories. The staff of the Commission were, at that time, the pre-eminent practitioners of survey and architectural recording and many were noted scholars in their own right. Within the Commission the National Monuments Record (NMR) established for itself an important role as a central repository of information on the historic environment of the whole of Wales, and as an important curator of physical records relating to this field.

However, 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.

Moreover, during the 1990s the most visible products of the Royal Commission, the County Inventories, have been discontinued and replaced by synoptic books and by computerised records which have considerable potential for development, but which rely heavily upon others for their new content.

As a consequence the Commission's Mission Statement no longer defines a unique role. Your questions in Section 3, therefore, are the crux of the matter: whether the Royal Commission is fulfilling its roles, whether these roles are still relevant and important, whether they could be fulfilled better by others, either independently or by absorbing the Royal Commission. We will comment at some length on these first questions (Q1-8) and rather more briefly on the others.

Q1. Does the Royal Commission's current work programme reflect its statutory duties and functions?

We judge that 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.

For example, it is well-known that the Commission is able to attend to only a fraction of nationally important threatened buildings, and is not even equipped to collect comprehensive intelligence from the local authorities on the state of the threat to listed buildings.

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.

In the last ten years the Commission has virtually abandoned any advisory role relating to the conservation and preservation of the historic environment. In the past the Commission was a well known and well respected source of disinterested advice, to Cadw and its predecessors, to many amenity bodies and indeed to individual owners seeking advice about changes to historic buildings in their care. Royal Commission staff would themselves appear at Public Enquiries. But we sense that Cadw Inspectors are now frustrated because they receive virtually no information or advice in this area. In fact the Commission has for years hardly commented on the draft Listed Building papers which used to be so well informed by the Commission's expertise.

Moreover Listed Buildings Consent and Scheduled Ancient Monument enquiries now receive only a standard letter including a bland statement to the effect that the Commission only offers advice on the importance of a site to survey and record, and that advice is not offered on matters of conservation! So one of the most valuable elements of personal expertise which formerly characterised the input made through these processes is now almost entirely lost.

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 to regional Sites and Monuments Records, has been sadly hampered by indecision in personnel and other matters. There have been similar difficulties in partnerships 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.

Q2 Is there a need for the functions carried out by the Royal Commission?

We feel that the work of field survey and building recording, along with the interpretation, management, curation and dissemination of the resulting records (including the physical archives of the NMR) are essential functions which must be maintained, both at national and regional level. It is more debatable whether a separate and independent body like the Royal Commission is needed to perform them.

There is certainly a national need for all the functions listed in para 2.2 a-f of your letter. All should be performed within public sector archaeology. We see them as vital if Wales is to have a balanced approach to designating historic sites, monuments and areas. Functions 2.2 d-f are necessary adjuncts to this process,

because well informed and disinterested advice is needed, and it is often difficult to offer that process under commercial conditions.

Q3 What would be the impact if the Royal Commission's functions were discontinued?

Unless these functions could be absorbed into a different, responsible national framework, the impact on the historic environment, and the understanding and appreciation of it, would be considerable and wholly adverse.

Q4 Are there functions that might advantageously be carried out by other bodies?

Any of the Commission's functions could be devolved, but not all to advantage. It is more to the point that all of these functions must be adequately resourced, whichever body undertakes them.

There must be merit in the idea of a single body independently incorporating the design of archaeological survey programmes, concern for scholarly and research standards, and accessibility of information. But such a body and its functions need to be well integrated with and respected by the other national, regional and special interest bodies involved with the historic environment. Such a body needs to be led with vision and a sense of cooperation and common purpose.

At present the Commission undertakes so little work in the fields of preservation and conservation and its role in Welsh archaeology is now so diminished, that it could be argued that its current work programmes are only token gestures to the national need.

Much of the work which it does undertake effectively - for example aerial survey - could be at least partly devolved (given adequate resources and expertise) and the uplands survey is undertaken largely outside the Commission in any case. Skilled architectural historians could in theory be deployed to local authorities where there is a need for them, but not all local authorities have adequate resources for this. Moreover the presence of a team, and a variety of expertise in a single organisation is likely to provide greater stimulus for independence of thought and operation and lead to a more balanced national overview.

Q5-8 Should the Royal Commission be merged with another organisation?

Yes, on its performance over the past ten years, we feel that 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.

We see many advantages, both in policy matters and administrative costs, in the establishment of a single body for those archaeological functions in Wales which *need* to be performed at a national level. 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 image as promoters of the historic environment, and as allies in the struggle to maintain historic buildings. The addition of the Commission staff as providers of information and advice, operating from a separate location but within a shared policy and vision, should help to foster this broader perception of the role of the National Assembly and its agencies in the protection and presentation of the historic environment of Wales.

Q8a/9 How effective is corporate planning? How effective is the match between resources ... and targets?

We have the impression that the Commission has "lost its way".

The Commission certainly sets targets and priorities, but are these the right ones? Having concentrated on the uplands, has it neglected the lowlands where more urgent threats are targeted? Having made a foresighted attempt to record the remnants of the coal industry in the 1990s it now seems to have abandoned the survey of Industrial Archaeology and it has scrapped an interest in surveying historic estates, parklands and gardens at a time when the demands for housing and amenity appear to prey stronger than ever on those areas.

Questions also need to be asked about cost-effectiveness and quality in the Commission's move from carrying out activities through its own survey staff to (largely) "facilitating" work carried out by others.

Q10 Do the staff ... understand and feel a sense of ownership of the corporate objectives?

We sense that the morale of the staff is low and the level of sickness amongst them may perhaps be indicative of this. In general we do not feel that we are dealing with staff in whom shared goals produce self-confidence and co-operative teamwork.

Q11 Does the structure ... of the Royal Commission enable regional, or other needs, to be fully recognised?

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.

Q12/14 Questions relating to the Royal Commission's achievements.

Information management is still a relevant and important role requiring a central and permanent base, with professional curation both for the growing digital record and for the physical collections of the NMR. 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. These are important aspects of national survey for which some form of central management is important and should be perpetuated.

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.

Many of the other achievements listed in paragraph 5 of your letter are of relatively minor significance and their inclusion is indicative of a rather desperate search for anything that can be claimed as an achievement, whether or not the Commission is a significant player (eg *Tir Gofal*).

For "disappointments and failures" see our answers to Q.1 and Q.4.

Q15/22 Questions relating to the Royal Commission's partnerships.

The committee of CBA Wales is made up of individuals who come into contact with the Royal Commission in a variety of ways – some as professional partners, some as private enquirers and some as general users of information.

Those who have been involved at a professional level have found, over the last decade, that 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. Professional partners are also concerned that, as Commission staff are

now seldom personally involved in fieldwork, the maintenance of standards among the Commission's contractors cannot be maintained to the previous high standards.

For those making enquiries to the Commission there has been varied, but generally improving, experience in recent years. 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 answerphone messages do not encourage penetration behind the electronic barrier. Recent changes at Plas Crig have greatly improved physical access and the development of on-line services may help many enquirers. Nevertheless the public face of the Commission could still on occasion be more friendly.

Q23/25 The Royal Commission in relation to the National Assembly

In our comments on your parallel review of Cadw we have urged that the National Assembly should take a more direct interest in the investigation, conservation, presentation and "championing" of the historic environment of Wales. We feel that 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.

In concluding this letter I should like to reiterate the hope that we would have the opportunity to discuss our comments more fully with you in a meeting. Our key points are:

our concern at the apparent decline of the Royal Commission over recent decades

our belief that the historic environment might be better served by the merger between the Royal Commission and a more broadly-based Cadw

our anxiety that the formation of a single body for the historic environment should not deny – indeed should reinstate – public and professional access to independent advice

the consequent need to maintain a certain distance between the regulatory and record arms of such a combined body

Yours sincerely,

Frances Lynch

Chairman, CBA Wales/Cymru

The Council for British Archaeology Wales/Cymru

CBA Wales/Cymru is an educational charity with over 500 individual and institutional members in Wales and beyond. Its object is to promote the interests of archaeology and the historic environment through a wide variety of activities in the fields of research, conservation, education, information and publication.