

# **Communities, Equality and Local Government Committee**

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

### **Response from Professor Ralph Griffiths, OBE, DLitt, FRHistS**

May I welcome the inquiry which the Communities, Equality and Local Government Committee has launched into the Welsh government's Historic Environment Policy. I recently submitted a comment to Mr. Huw Lewis on his 'Written Statement by the Welsh Government' on the subject of 'planning for the future of historic environment services in Wales', and its proposal that the Royal Commission on the Ancient and Historical Monuments of Wales be merged with Cadw. I received an acknowledgement from Cadw itself – surprisingly – without indication of your committee's inquiry. I accordingly attach a copy of my letter to Mr Lewis since it bears on the 'consultation questions' noted in your letter, and would like to submit it and the present letter to your committee.

I am writing on my own behalf as an academic and professional historian with a close interest in the historic environment. I have no objection to public disclosure of the comments in either of my letters.

May I offer, in addition to the attached letter, a few broader comments on your consultation questions?

1. The protection and management of the historic environment is the responsibility of Cadw as a part of the government, and it discharges its obligations in respect of the 127 sites in state care, the monitoring of threats to scheduled sites, and applying the law relating to the historic environment. I believe that it discharges these responsibilities well, and should focus primarily on them rather than dissipate its activities. That might make Cadw more responsive and expeditious in dealing with the interested public: one might instance the very lengthy discussions relating to the proposed Heritage Bill.
2. Promoting the historic environment must be underpinned by the basic recording of the tens of thousands of sites in Wales, their sound interpretation, and their availability to the public – on-line, digitally and by means of authoritative publications. This is the special responsibility and focus of the Royal Commission in managing and developing the National Monuments Record of Wales.
3. Synergy between historic environment policy and other government objectives is important, notably in relation to education, health, the quality of the environment and the responsibilities of local authorities (the last either individually or jointly where specialist units do not exist). There is scope for development in this area.
4. My attached letter to Mr. Huw Lewis concludes that few, if any, advantages would result from merging the Royal Commission with Cadw. Ending the 'arm's length' principle of the Commission by merging with the government's agency would undermine the trust of the public, and such a merger would run the risk of prejudicing

further the responsiveness of the larger body in relation to the public and, indeed, the continuance of the Commission's core work.

5. Local authorities and third sector organizations are important elements. Relations with the former could be improved. In the latter case, the regional archaeological trusts, part-funded by the tax-payer, have an intimate connection with Cadw, the Royal Commission and local authorities. For example, the Royal Commission monitors the compilation of the regional Historic Environment Records and ensures that they meet a uniform, high and international standard in preparation for publication on the trusts' regional *Archwilio* web-site, supplementing the Royal Commission's national web-site of the National Monuments Record of Wales, *Coflein*.

I hope these remarks are helpful to your committee.

Yours sincerely,

Ralph Griffiths  
*Emeritus Professor of Medieval History*

Annexe A

**From Professor Ralph Griffiths, OBE, DLitt, FRHist S**

Huw Lewis, Esq., AM,  
Minister for Housing, Regeneration and Heritage,  
Welsh Assembly Government,  
Cardiff Bay

27 May 2012

Dear Mr Lewis,

*Planning for the future of historic environment services in Wales*

May I offer a comment on the WRITTEN STATEMENT BY THE WELSH GOVERNMENT relating to planning 'for the future of historic environment services in Wales' which was published under your name on 3 May 2012.

I applaud your wish 'to ensure that the core functions of the sector bodies' responsible for the historic environment services in Wales be 'shaped for coherent and sustainable delivery', and your further wish that the Royal Commission should work with Cadw and Cymal to best advantage. However, intentionally or otherwise, the Statement gives the impression that a decision has already been taken to merge the Commission 'with other organizations, including Cadw' and that the working group you have established is merely charged with creating 'a process' by which this can be achieved. The decision has apparently been taken without seeking expert, independent advice or engaging in some form of public consultation. The small implementation group mentioned reflects exclusively internal interests as if such a change is primarily one of administrative convenience for budgetary reasons. 'Planning for the future of historic environment services in Wales' is too important a matter to be left to this kind of mechanism, which is likely to cause misgiving among those interests among the public, the professions and academia to which these services are of vital importance.

My experience as a former member of the Commission from 1990 (and its chairman during the first decade of the devolved administration) convinces me that to absorb the Commission into the Welsh government, thereby compromising 'the arm's length' principle which many individuals and institutions regard as one of its major strengths, would be a retrograde step. It is worth noting that a similar proposal by the British government (covering Wales among the countries of the UK) is currently out for consultation, and the relevant department of state has specifically recommended that the functions should continue to operate 'at arm's length'. Retaining the public's confidence requires no less in this case.

My experience as a former member of your predecessors' Ancient Monuments Advisory Board from 1991 convinces me that the consequences of abolishing this and its companion Historic Buildings Advisory Board has been unfortunate. Aside from ensuring that ministers formally received, via Cadw, expert and independent advice, that decision blunted the 'arm's length' principle and has reduced the confidence which Cadw's decisions in these areas ought to command. The members of the Royal Commission are also expert and independent, and

on a national and international level: that is important to the Welsh government's heritage services and reputation, and is not currently matched by Cadw and Cymal.

My experience as a former member of the Lord Chancellor's Advisory Council on the Public Records housed in The National Archives, which has responsibility for the vast bulk of Welsh public records, makes me aware of the high regard in which the Commission's National Monuments Record has been held by the reviewing officers of The National Archives, within the limitations of space and funding at Aberystwyth. Neither Cadw nor the fledgling archives department of the government in Cardiff has the experience and professional expertise to manage the National Monuments Record as effectively.

The interests of the public, the education and environmental sectors, and certain professions and academia need to be assured that 'Planning for the future of historic environment services in Wales' is conducted at an appropriate level with the expert, independent and public consultation that is normally accorded such major changes. The Commission has been the subject of several independent and transparent reviews in the past decade: has Cadw undergone comparable reviews? I should be grateful if you would explain how you plan to maintain the fundamental and unique contribution which the Commission makes to safeguard Wales's historic environment.

I look forward to hearing from you.

Ralph Griffiths

Emeritus Professor of Medieval History