

HE 47

Y Pwyllgor Cymunedau, Cydraddoldeb a Llywodraeth Leol
Communities, Equality and Local Government Committee
Bil yr Amgylchedd Hanesyddol (Cymru)/Historic Environment (Wales)
Bill

Ymateb gan: Stephen Briggs

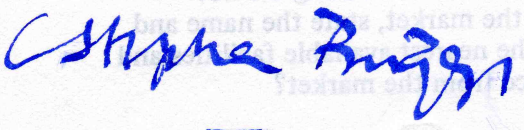
Response from: Stephen Briggs

Dear Sir or Madam,

1. I offer whole-hearted support to the general principles behind the intention of the Historic Environment (Wales) Bill with its potential to offer the historic environment greater sustainability and more effective protection.
2. My comments here concern the Registration of historic gardens and parklands and the fitness of the available documentation to uphold its task Statutorily. These views are informed mainly by experience at the Royal Commission on Ancient and Historical Monuments (Wales) between 1987 and 2006, and from ongoing personal interest in retirement since. At RCAHMW I initiated a database of historic gardens meant to inform site conservation and preservation for research, education and Registration nationally. The point that Statutory Registration needed backing by a complementarily comprehensive database was always borne in mind.
3. To meet the requirements of the Planning process Statutory protection needs documenting with accurate well-informed evidence-based descriptive and historically researched texts to justify claims for dating, architectural and garden styles, rarity and access potentials. Inadequate research could result in losses of unique features (some of which may be buried) when challenges are made from inappropriate development proposals or unmonitored vandalism.
4. At present the quality of Register entries is variable. This is partly because its component volumes were compiled by several contractors, not all of whom researched to the same depth, and only two of whom visited the National Monuments Record to consult on all the sites proposed for inclusion. Indeed, during the compilation of site dossiers prior to Register completion, contact by Cadw with RCAHMW and the Archaeological Trusts was very limited. As some of the information passed to Cadw from RCAHMW's survey or research was never incorporated into the Registers, it is clear that the problem sites mentioned in the writer's 2008 review of the Register's first revision (attached herewith) are not alone. Some Registered sites are documented by very limited bibliographical or archival research so that even some much-acclaimed site histories may be open to challenge.
5. It is therefore clear that the Register is in urgent need of revision, updating and probably even expansion. Ideally, such work ought to be undertaken by appropriately qualified staff under the guidance of more experienced officers. Furthermore, it is important that attention should be paid to updating the RCAHMW database, so that the two exercises run in tandem. Both requirements have important future funding implications.

6. A more detailed critique of this position – including more problem sites - could be provided to the Government’s consultation should that be required.

Yours sincerely,



A handwritten signature in blue ink, appearing to read 'Stephen Rugg', is written over a faint, illegible background. Below the signature is a short horizontal line.

Senior Investigator RCAHMW (1973-2006), sometime Head of Archaeology and Manager of Parklands and Gardens databasing project 2004-2006; Member of Cadw-ICOMOS Historic Gardens Register Steering Committee during the 1990s; Life Foundation Member Welsh Historic Gardens Trust, Editor WHGT journal *Gerddi* 2004-2012; Member Appointed by the Secretary of State for Wales on Brecon Beacons National Park Planning Committee 1986-1995; Sometime member of Councils of Society of Antiquaries of London; Institute for [Field] Archaeologists GB 1998-2005; IfA Wales present committee and Council for British Archaeology Wales Cymru intermittently 1973-2013; Secretary for Industrial Archaeology 1982-91.

THE ANTIQUARIES JOURNAL 88 (2008) 485-9: *REVIEWS*

[not re-formatted]

Published and online databases of historic parks and gardens, with particular reference to Wales. Coflein <<http://www.coflein.gov.uk>> 31 July 2008)

Canmore <http://www.canmore.gov.uk/BI/ENG/Search+RecordsCARN/> >(31 July 2008)

Parks and Gardens UK <<http://www.parksandgardens.ac.uk>> (31 July 2008)

Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, part I: Parks and Gardens, Additional and Revised Entries, Volume 1 (with text in Welsh and English) 300mm. Pp xv +76, 15 site plans. Cardiff, Cadw, Welsh Assembly Government, Cardiff CF15 7QQ, 2007. ISBN 9781857602494

When the National Monuments Record for Wales (NMRW) at RCAHMW in Aberystwyth began compiling digital sites and monuments databases as part of its changing remit in the early 1990s, Wales lagged well behind England in the designation and recording of historic parklands and gardens. Initially, data was transferred from paper records, where they existed. But in the case of parklands and gardens, these were few and far between. The Cadw Registers (see below) were being compiled quite independently from Cardiff, so the Commission’s historic gardens record was built up from systematic searches of the first and second editions of the 25-inch OS Plans: mainly the latter. Teething troubles were addressed slowly. An early quantum shift from *Foxpro* to the present *Oracle* system demanded the time-consuming manual recovery of lost ‘child tables’ carrying important garden details. Eventually launched in October 2005, this gardens database was integrated into a map-based countrywide sites and monuments record (SMR) for Wales known as *Coflein* (Welsh for memory: <http://www.coflein.gov.uk>). Administered from RCAHMS in Edinburgh, it operates alongside Scotland’s online record, *Canmore*. *Coflein* is described on its homepage as a ‘public online database..combining .. information about archaeological sites and buildings of all periods with catalogue information about the NMRW archive collections, and adds that ‘increasingly, archives can be viewed and downloaded directly..’

As RCAHMW is not the only record-holding body in Wales, a further statement explains how ‘a public online portal is being developed to enable searching across databases created by other organisations in Wales concerned with aspects of the historic environment.’ Online since 2002 as predecessor to *Coflein* ‘CARN (Core Archaeological Record iNdex) is the public entry-point to the Extended National Database compiled by archaeological organisations across Wales.’ CARN’s 7

partner bodies include the four Archaeological Trusts, Cadw and the National Museum of Wales. By mid-2008 COFLEIN's complement of c 80,000 sites included around 2,500 garden entries. Of these, about 2,200 range from higher status properties to undated peasant steadings. The remainder are individual features found in gardens or parklands – mainly of architectural significance. Separate access into the NMR section of the database is needed to download pdf documents of the designated sites on the *Cadw-ICOMOS Historic Gardens Registers*. The strength of any database lies in its constant enhancement through use, development and revision. With this in mind, the Commission made efforts during the mid 'nineties to involve the voluntary sector in a gardens databasing partnership. These efforts all but foundered for several reasons, though a small but welcome number of site descriptions was contributed by three county groups of the Welsh Historic Gardens Trust Ceredigion, Clwyd and Pembrokeshire. (The latter county contributes to this day).

The Welsh Commission never undertook garden surveys on the scale of its former English counterpart, though over the years staff did visit a number of sites. Some earthworks were surveyed, however, though not all their details are yet incorporated into *Coflein*. In fact many online entries are nonetheless backed up by descriptive texts and non-digitised media. Enquirers are encouraged to email the NMR for up-to-date information on uncatalogued site documentation or about ongoing investigations.

It is noteworthy that the third edition of *Parks and Gardens: A researcher's guide to sources for designed landscapes* (Lambert *et al* 2006), mentions CARN as ‘.. a national resource for archaeology and architecture, including parks and gardens’ (p.49), because, as will be seen, garden historians otherwise seem to have been slow to recognise its potential.

Although RCAHMW now appears to employ no dedicated specialist staff to develop or maintain a serious level of investigation or outreach for historic gardens, and the quality of total database coverage remains uneven, *Coflein* is still probably the most comprehensive online tool available for researching estate nuclei and historic gardens in Britain.

At the End of May 2008 *The Parks and Gardens Data Service Ltd* was launched in London. Some of what follows is adapted from its website. A not-for-profit company set up through partnership between the Association of Gardens Trusts and the University of York, its project began in July 2005 and runs to March 2009. It is backed by a grant of nearly £1million from the Heritage Lottery Fund with contributions in kind by volunteers and members of the Association of Gardens Trusts. Coverage is intended of all historic parks, gardens and designed green spaces of England, Northern Ireland, Scotland, Wales, the Isle of Man and the Channel Islands. It is ‘for anyone who wants to find out more about historic parks and gardens - schoolchildren, academics, professionals or members of the general public’. By the end of March 2009, it will include around 7,000 basic records and 500 more detailed records of historic parks and gardens across the UK. Themed articles, virtual tours, and learning resources for schools are also planned. The facility also offers training facilities for researching and recording historic parks and gardens. Although mentioning that it gives online access to thousands of records..contributed by the UK's 37 gardens trusts and other heritage organisations, such as English Heritage, Cadw, Historic Scotland and the Northern Ireland Heritage Gardens Committee, and whilst acknowledging help from RCAHMW and RCAHMS, neither of the major existing national SMR databases *Coflein* and *Canmore* appears in the covering text.

Searching is by area and place-name. Map-based access is provided by *Google Imagery Bluesky* which offers an aerial photographic dimension not immediately available on any existing online database, though *Google Earth* (using the same vertical aerial photography) can now be freely downloaded and used independent of this data service.

Designated (and some other) sites may also be accessed alternatively, through linkage to several individual heritage organisations. As at present the Welsh section is dominated by Cadw-registered sites (probably some 450-500), this references most Welsh gardens. Incidentally, the sites on Historic Scotland's own website seem to be similarly duplicated by this ‘new’ database. But whereas all sites linked to Historic Scotland and Cadw are listed by virtue of their designation, those many other undesignated gardens online - described, databased, and often surveyed and planned by the Scottish and Welsh Commissions are denied similar linkage treatment. So whereas *Canmore* lists over 1745 historic gardens, that website is not obviously cross-referenced under any Scottish site descriptions. And although *Coflein* is linked to some Welsh gardens in the *Reference* section, it is absent from others that would equally benefit. Bibliographical citation seems to be generally inconsistent throughout and no bibliographical or referencing standard seems to have been adopted. Consequently, some important

sites lack their most important references, while others are supported by relatively obscure citations and the authority of some organisations is favoured over others, though without obvious reason.

One is left asking how the HLF came to approve the expenditure of £1million to create a new online database, the main body of which duplicates existing government-funded databases, and which draws much, if not most of its content from those sources. Why promote a new database rather than develop the existing scholarly, evidence-based data sources already established (and arguably under-funded) within the governmental heritage framework?

The recently published Register of Landscapes, Parks and Gardens of Special Historic Interest I Wales: Part 1 Parks and Gardens, Additional and Revised Entries, Volume 1, is the latest in the series of publications on parklands and gardens making up Part I of the ICOMOS *Register of Landscapes* (Part 2 being *Registers of the Historic Landscapes* proper). It is preceded by Register Volumes on: Gwent, 1994; Clwyd, 1995; Gwynedd, 1997; Powys, 1998; Glamorgan, 2000 and Dyfed, 2002 (all published by Cadw: Welsh Historic Monuments: Cardiff). These were researched by four main consultants together with Cadw staff who undertook the remaining research and editorial. The consultants' approaches seem to have differed in certain respects, so the process of bringing their work to the press cannot have been easy. Cadw's policy intention of updating and revising historic gardens Registration is much to be welcomed. This new volume presents thirteen new sites and two revisions. Updating recognises both that important sites still await discovery and recognition; that landscape values are not static, and that interesting gardens are still being planted (though they have to be at least 25 years old for inclusion here). A revision policy additionally accepts that changing circumstances or fresh discoveries may demand the writing of new site interpretations. Here the revisions are to Dewstow House and Plas Machynlleth. Ten of the new sites (Coytrahen House, Bridgend; Coryton House and Whitchurch Hospital, Cardiff; Bailey Park and Linda Vista Gardens, Abergavenny; Chepstow Park; the Nelson Garden and Wonastow Court, Monmouth; Penrice Castle Swansea and Nos 15 and 17 Stow Park Circle (St Elvios House), Newport) are in South Wales; one (Cardigan Castle) is in mid-Wales, and only two (Hendre House, Conwy, and Trawsfynydd Nuclear Power Station), are in the North. Of these, seven are currently in public ownership or are managed in the public interest.

A regular formula for text and site plan was adopted in Register compilation from the first in 1994. Often drawing on existing official Listed Building or Scheduling information, the texts usually offer detailed site descriptions of all features within site curtilages as well as brief notes on garden makers and the families who maintained them. These accounts are usually thorough and accurate. And give or take a few quibbles about chronological interpretation, most should stand up to scrutiny under cross-examination at Public Enquiry – though others, like Aberglasney and Old Gwernyfed are certainly also now in need of revision. The addition of more important public parks to the Register is now particularly to be welcomed, as, hopefully, this advisory designation encourages forward-looking local authorities to seek appropriate resourcing levels for maintaining them properly.

There is, however, some unevenness of coverage in the bibliography and documentation of the Registers generally. Some texts have not always enjoyed full advantage of supporting information resources available outside Cadw. Consequently, it may be worth using the present volume to offer observations on these problems and suggest ways of improving future accounts.

Until recently, sensitivities about the de-commissioning process at Trawsfynydd Nuclear Power Station inhibited useful discussion of the product of that remarkable partnership under which Sir Basil Spence designed the building while its accompanying landscape was laid out under the eye of Dame Sylvia Crowe. Here, at last, Cadw has grasped the nettle and recognised Crowe's important role if not Spence's (his work here has never been Listed), by offering her landscaping Grade II* Register status. Unfortunately, Crowe's vision will soon be deprived of Spence's two complementary reactor towers - originally intended at full height to resemble a medieval castle in the rugged Snowdonia landscape - because they are to be lowered to accommodate fashion.

The Register here offers modest bibliographical documentation to back up its comprehensive description and appraisal of the Crowe-Spence partnership, but omits mention of any material listed on *Coflein*. Hence the absence of NMR entry C421142 on a deposit made in 2000 of 'photocopies and transcripts of documents held by the Public Record Office, relating to the construction of the power station and landscape development, including correspondence, site drawings, minutes of the public inquiry held in February 1958, minutes of the design meeting held in 1962 with notes by Sylvia Crowe... collated for the Welsh Historic Gardens Trust using a grant from Countryside Commission for Wales...' (deposited in 2000). Among other material which could have also usefully informed the background to this designation entry is Crowe's personal testimony on her landscaping philosophy at

Trawsfynydd in *Country Life* (October 19th 1961, 872-4).

Inconsistencies in documentation and bibliography in the Registers generally can sometimes relate to a lack of clarity about the history of site discovery, recognition and survey. On the face of it, the entry supporting Chepstow Park Wood's place on this Register as a thirteenth-century deer park unfolds as a remarkable and laudable piece of fieldwork, discovery and research. Interestingly, however, *Coflein* reveals that OS staff knew of the site in 1958, when they described it briefly on the OS Antiquity Card (Os495card; ST49NE16) documenting its name on all maps since.

Similar criticisms beset the account of the Pulhamite Garden that formerly belonged to St Elvio's House and which lies behind nos 15 and 17 Stow Park Circle, Newport. This at first sight also appears to have been discovered by Cadw Staff. But *Coflein* offers a fuller story. St Elvio's was investigated by the RCAHMW during its demolition in 1998, when R.F.Suggett and G.A.Ward discovered, described and photographed the garden and its Victorian plantings, even detailing how 'Coal dust covers the former asparagus beds' (NMR photos 980090-3 and 4). A record fine awarded against the developer (£200,000) for illegally demolishing the house is reported in *The Newsletter of the Ancient Monuments Society* (Summer 1998).

A final concern must be articulated about the very nature of bibliographical support for the Register's revision of Dewstow House near Caerwent, where excavation has shown its Pulhamite garden to be much more extensive than appreciated when it was first Registered in 1994. Fundamental differences arise in the presentation of a revised bibliography. The 1994 account listed a handful of secondary printed sources: Bradney's *County History* of 1929; Birbeck's local history of 1978; an autobiographical work of 1987; a newspaper article, and an unpublished *Archaeological Field Evaluation* by the Glamorgan-Gwent Archaeological Trust of 1992 (which seems better defined as a primary source).

This new bibliography lists only the 1987 autobiography. All other documentation is missing. Disturbingly, only two primary sources are added. One is simply a personal acknowledgment; the other refers to Dewstow's web site (address not stated in the Register but currently <www.dewstow.co.uk/gardens.htm> access 31 July 2008).

No criticism is intended here of Dewstow Golf Club or any other business using that web site, but the principle of referencing a commercial website in preference to scholarly bibliography when submitting a site for national heritage designation sets a worrying precedent. To begin with, web sites are notoriously impermanent. Private sites are more vulnerable to change or permanent loss than government-sponsored ones and this particular website anyway carries no bibliography. So this 2007 supporting documentation cannot substitute the one presented in 1994.

Finally, and perhaps most importantly, a serious principle about conflict of interest is at stake here. The Dewstow website promotes commercial recreation and accommodation, so its principal objectives are incompatible with those of Cadw-ICOMOS. Supporting proposed site designation texts using promotional data from historic site owners effectively puts their interest - or that of their successors in title - above the kind of independently-compiled evidence-based research that should underpin conservation measures being made in the public interest. In short, reference to a commercial website instead of a scholarly bibliography could undermine the Register's authority in the event that its text would be needed to defend a site's status at Public Enquiry.

This review touches upon a number of problems related to both funding and scholarly values for site documentation and outreach. The most obvious public interest concern is the current and ongoing duplication of resourcing in website database creation. Also of relevance to heritage practitioners is the need to establish clear parameters of scholarly standard both in databases and site designation submissions, though it is difficult to see how standards might be set and achieved. In the short term, closer communication and cooperation in the provision of data between some of the government heritage bodies would ensure greater evenness in the use of supporting documentation for all purposes, particularly where the rapid availability of new site descriptions may be problematic. Perceptions about conflict of interest and its potential consequence also need addressing, as a continuing failure to recognise that will only demean the success of the fundamentals we are here to deliver - the survey, documentation and protection of the historic environment. Such questions assume particular poignancy given the proposals set out in the new Heritage Bill, which may well, if passed, establish the new framework for designation for several generations to come.

Lambert, D, Goodchild, P and Roberts, J 2006. *Parks and Gardens: a researcher's guide to sources for designed landscapes*, Redhill, Surrey.