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Welsh Government
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17 September 2013

Dear Mr Jones,

Consultation on the draft Policy Statement for Protected Landscapes in Wales

Thank you for the opportunity to comment on this draft Policy Statement.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors. IfA's Wales / Cymru Group has over 100 members practising in the public, private and voluntary sector in Wales.

Draft Policy Statement for Protected Landscapes in Wales

IfA welcomes the publication of a draft Policy Statement for Protected Landscapes in Wales to replace the Policy Statement for the National Parks and National Park Authorities in Wales (2007). In particular, the Institute welcomes the revision of the earlier Policy Statement to include consideration of Areas of Outstanding Natural Beauty (AONBs) and the recognition that *'designation [of protected landscapes] exists to protect many of Wales' most important landscapes and heritage assets'* (paragraph 14 of the draft Policy Statement, my underlining). However, IfA is concerned to see that recognition reflected throughout the document and embedded firmly in policy. Most landscapes in Wales have been influenced by human activity and there is little that is truly 'natural'.

Specific Questions

Question 1: Do you think this policy document adequately positions Wales' protected landscapes to play a central role in taking forward a vision for a sustainable Wales?

1.1 No. The crucial role that the management and protection of the historic environment has a to play in taking forward a vision for a sustainable Wales was made clear in the second edition of Welsh Government's Historic Environment Strategy published in May, 2013 and needs to be fully reflected in this Policy Statement.

1.2 Although there is some recognition in the draft Policy Statement of the importance of the historic environment in the landscapes of Wales (as noted above, and elsewhere, for instance at paragraphs 26 and 41), a more holistic view of the environment (encompassing both the natural and the historic environment) needs to inform the policy approach of Welsh Government.

1.3 Thus, for instance, consideration of the 'ecosystem approach' in paragraphs 16 and 34-37 (and the preceding preamble) concentrate solely on the natural environment. IfA does not take issue with an ecosystem approach provided that it fully integrates the historic as well as natural environment.

1.4 Furthermore, the draft Policy Statement omits the following paragraph which appeared in the 2007 Statement:

'On the historic heritage, the NPAs are working effectively with Cadw, the local authorities the voluntary sector and local communities on heritage conservation – and the Welsh Assembly Government is keen to see these partnerships continue and develop. The NPAs will also have a role to play in taking forward the planned reforms outlined in the UK Government's heritage protection White Paper.' (Paragraph 18c)

Although the UK Government's heritage protection white paper is not currently being taken forward, reference could helpfully be made in the new Policy Statement to the involvement of Cadw and other stakeholders in bringing forward a Heritage Bill for Wales and the importance of protected landscapes as key components of any future framework for heritage management and protection.

Question 2: Does this policy document enable Wales' protected landscapes to fully deliver on their respective statutory purposes?

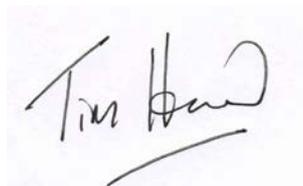
2.1 In some respects, yes, but the role of the planning regime in delivering the statutory purposes of protected landscapes was more fully set out (as regards National Parks) in the 2007 Policy Statement (see paragraph 18e) and should be explained in greater detail in this document. It would be helpful clearly to signpost in the Statement links to planning policy documents for Wales and, in particular, Planning Policy Wales.

Question 3: If you have any related issues which we have not specifically addressed, please use this space to report them:

3.1 No comment.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,



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Policy Advisor