



CAP Planning Division
Welsh Government
First Floor, West Wing, CP2
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Cathays
Cardiff, CF10 3NQ

23 April 2013

Dear Sir / Madam,

Consultation on Common Agricultural Policy Reform – Rural Development Plan 2014-2020: Next Steps

Thank you for the opportunity to comment on this document.

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.

The Common Agricultural Policy Reform – Rural Development Plan 2014-2020: Next Steps

General

IfA welcomes the support that the Common Agricultural Policy (CAP) and, in particular, Glastir (and its predecessor agri-environment schemes), has provided for the historic environment. However, although one of the objectives of Glastir is to manage and protect landscapes and the historic environment, there is a need for the historic environment to be more generally and explicitly integrated into CAP mechanisms to provide a clear basis for the continuation of that support.

With that in mind, IfA is pleased to see that the next Rural Development Plan (RDP) will not contain axes but is intended to have '*a more flexible structure based around 3 broad Objectives*' and that '*a more consistent approach to the cross cutting themes [which include sustainable development] [is to be] adopted*'. However, notwithstanding the fact that the historic environment has a key role to play in sustainable development, the emphasis in current CAP mechanisms is very much on the natural environment. Although restoring, preserving and enhancing European landscapes (which clearly includes the historic environment) is explicit in Priority 4, for the most part the historic environment is treated as ancillary to the natural environment. So far as is possible within the European framework, Welsh Government should use the RDP to promote the historic environment alongside the natural environment.

We welcome Welsh Government's identification of the Culture and Heritage of Wales as one of the priority areas in its Programme for Government and we look to Welsh Government to ensure that it continues to deliver benefits for the historic environment through its delivery of the Rural Development Plan for the period 2014-2020.

Specific Questions

The answers below relate specifically to the historic environment.

1. Do you agree that the key issues for rural Wales have been identified in the SWOT and the Situational Analysis?

- 1.1 The shortcomings of the SWOT analysis in relation to Priority 4 include
- (i) a failure fully to recognise the opportunities to manage and protect the historic environment inherent in '*restoring, preserving and enhancing ... the state of European landscapes.*'
 - (ii) a failure to recognise as a weakness the emphasis on ecosystems and the natural environment without adequately addressing the position of the historic environment as an integral part of the 'environment'.

3. Do you agree with the proposed alignment of opportunities to each of the European Commission's Priorities for rural Development?

3.1 No. Opportunities for the historic environment should be more clearly identified.

5. Do you agree with the proposed areas of support under the Environment heading?

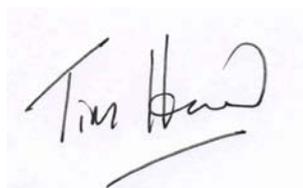
5.1 No. These should more clearly embrace the historic environment.

8. What percentage of the EAFRD investment should be targeted at agri-environment activities and why?

8.1 We would wish to see the level of investment maintained in order to continue to provide the positive benefits which have been delivered for the historic environment.

We would be happy to discuss these issues in greater depth. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,



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Policy Advisor