



Water Strategy Programme Manager
Water Branch
Energy, Water and Flood Division
Welsh Government
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

19 June 2014

Dear Sir / Madam,

Consultation on A Water Strategy for Wales

Thank you for the opportunity to comment on this consultation.

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 300 members practising in the public, private and voluntary sector in Wales.

IfA has successfully petitioned for a Royal Charter of Incorporation which was granted on 03 June 2014.

A Water Strategy for Wales

General

IfA welcomes Welsh Government's aim to develop a more integrated approach to managing water and its recognition that water '*is an integral part of Wales' culture, heritage and national identity*' (page 3, Ministerial Foreword).

However, the consultation (and detailed approach to the formulation of a strategy) fails adequately to address the historic environment as a significant consideration, concentrating almost exclusively on the natural environment. Thus, for instance, while the consultation identifies the emerging Environment Bill in the context of related policy areas, no mention is made of the nascent Heritage Bill.

The management and protection of the historic environment is a key component of sustainable development, which is defined in Planning Policy Wales to mean '*enhancing the economic, social and environmental well-being of people and communities ... in ways which:*

- *enhance the ... cultural environment and respect its limits*'. (PPW, figure 4.1)

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Water management can have a very significant impact upon the historic environment (not only as regards the effects of providing or altering infrastructure, but also, for instance, through the potentially drastic effects of changes in drainage regimes upon buried archaeological remains). The Water Strategy for Wales should clearly reflect the need to respect the historic environment in delivering an integrated approach to water management.

In answering the following specific questions, IfA confines itself to issues relating to the historic environment.

Specific Questions

Water for Nature, People and Business

1. In looking at implementing legislation, are there any specific areas that you would like us to focus on?

1.1 Yes. IfA would like Welsh Government to focus on the management and protection of the historic environment as a significant component of delivering an integrated approach to water management (see above).

4. What opportunities do you see for developing PES schemes in relation to water management in Wales? What should be the role of Government in developing these schemes?

4.1 PES schemes should only be developed if they fully integrate services provided by the historic environment.

A New Approach for Drainage

23. Are there any other significant issues which you believe we should have included?

23.1 Yes. The Strategy should address the effect of drainage upon the historic environment (see above).

Supporting Delivery

24. Do you agree with our approach to ensuring that regulation is focussed on the Welsh Government's priorities?

24.1 Yes, provided that those priorities include the management and protection of the historic environment.

28. What information would you find useful to assess how the Welsh Government has progressed against key outcomes and actions in the Strategy?

28.1 As regards the historic environment, information quantifying benefits / harm arising from the implementation of the Water Strategy.

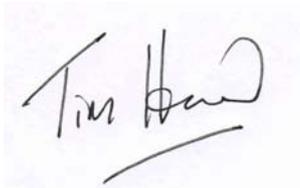
29: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

29.1 IfA welcomes the recognition (at page 64 of the consultation document) of the importance of having the right skills to implement the Strategy and the need for '*specific education and training opportunities to meet our future water management needs*'. Such skills (and the education and training opportunities needed

to support them) should include skills relating to the historic environment. The Institute would be happy to discuss training opportunities in this regard.

The Institute would be delighted further to contribute to the formulation of the Strategy insofar as it relates to the historic environment. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a horizontal line underneath the name.

Tim Howard LLB, Dip Prof Arch
Policy Advisor

