



WG-17030
Sustainable Development Bill Team
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

27 February 2013

Dear Sir / Madam,

A Sustainable Wales – Better Choices for a Better Future: Consultation on proposals for a Sustainable Development Bill

Thank you for the opportunity to comment on this White Paper.

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.

Proposals for a Sustainable Development Bill

Question 1: What are your views on the proposals for a new duty to embed sustainable development as the central organising principle of selected organisations in Wales?

1.1 IfA welcomes the new duty to embed sustainable development as the central organising principle of selected organisations in Wales. We particularly welcome the reference to the '*cultural environment*' and '*our cultural legacy*' in the Welsh Government's definition of sustainable development at paragraph 1.9. Respect for the historic environment is a key component of sustainable development which has a crucial role to play in the management and protection of heritage assets across Wales.

1.2 However, for the full potential of sustainable development to be realised, it will be necessary for this Bill to be fully integrated and coherent with all other legislation in Wales (including the emerging Heritage, Environment and Planning Bills) as stressed in the White Paper at paragraphs 2.17 and 2.18. Unless this can be achieved in practice, the purpose of the Bill will be undermined.

Question 2: What are your views on the proposals for an independent sustainable development body?

2.1 IfA agrees with the overall purpose to provide support for organisations (in the first instance for the public service, but also, where possible, for other organisations in Wales). While we understand the dangers of being overly prescriptive as to the body's role, the body will need clear direction and sufficient resources to allow it provide leadership within and outside the public sector. The body should contain or have clearly defined routes of access to a broad range of expertise, including archaeological and other historic environment expertise. Any advisory panel (as envisaged at paragraph 3.14) should contain such expertise.

Question 3: What are your views on the proposed phasing and implementation of the duty, including the timing of the establishment of the independent sustainable development body?

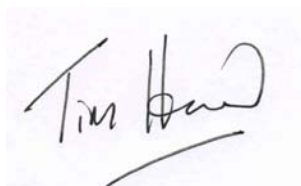
3.1 No comment, save that the White Paper, in dealing with implementation, refers to the Sustainable Development Indicators at paragraph 4.8. The current indicators do not include any specific indicators for the historic environment and we would urge Welsh Government to correct this omission in the forthcoming revision of those indicators. Without meaningful indicators for the historic environment, progress (or, just as importantly, lack of progress) with regard to the management and protection of the historic environment is unlikely to be addressed in any assessment.

Question 4: What are your views on the proposals to improve the accountability framework for sustainable development in Wales?

4.1 IfA welcomes any improvement in the accountability framework for sustainable development in Wales.

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, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Policy Advisor