



The Committee Clerk  
Environment and Sustainability Committee  
National Assembly for Wales  
Cardiff Bay, CF99 1NA

06 November 2014

Dear Sir / Madam,

**Inquiry into the general principles of the Planning (Wales) Bill**

Thank you for the opportunity to submit evidence on the general principles of the Planning (Wales) Bill.

**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 3,200 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.

**IfA Evidence on the general principles of the Planning (Wales) Bill**

**General**

1. The planning system plays a key role in the management and protection of the historic environment in Wales (which includes archaeological remains both above and below ground). That role is not confined simply to designated assets. Over 90% of the historic environment is undesignated (i.e. not specifically protected by listing, scheduling or some other statutory designation) and is, for the most part, solely protected as a 'material consideration' in the planning process.

2. In this regard, IfA submitted a response dated 26 February, 2014 to Welsh Government's consultation on *Proposals to Reform the Planning System in Wales*<sup>1</sup> in which it welcomed Welsh Government's aims to reposition the planning system in Wales 'as a tool to manage change in the public interest', to clarify and streamline the system and to enable 'appropriate development' provided that development was truly sustainable.

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3. The Institute particularly welcomes provisions in the Bill to reinforce the plan-led system, to front-load the development management process by making provision for pre-application services and to modernise enforcement mechanisms. It confines its evidence in response to the terms of reference of this Inquiry to (1) the need for legislation in relation to planning committees and delegation (clause 37 of the Bill) and (2) the need for legislation to facilitate a review of Design and Access Statements (clause 27 of the Bill).

#### **Planning Committees and Delegation**

4. IfA welcomes the provisions in clause 37 of the Bill which allow for regulations to be made governing the discharge of functions by committee, sub-committee or officer. Such regulations are needed, in particular, to require *'compulsory training for members of planning committees, including procedures where training requirements have not been met by individuals'* (Independent Advisory Group recommendation cited at paragraph 3.84 of the Explanatory Memorandum). Such training should include training with regard to the historic environment. (Those not directly involved in the heritage sector may not need to attain levels of skill and knowledge required for a historic environment practitioner, but still need to have a basic knowledge and understanding of the historic environment and its significance in the planning system. Basic training of planners and members, however, does not remove the need for archaeological and wider historic environment expertise in the assessment of planning proposals.)

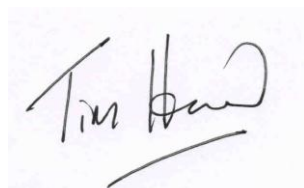
5. The Institute would welcome the opportunity to work with Welsh Government and other stakeholders to deliver training in this regard.

#### **Design and Access Statements**

6. The introduction of clause 27, facilitating a review of Design and Access Statements is necessary and supported by IfA. In an archaeological context, the relationship between Design and Access Statements (for which there is no professional, archaeological standard) and desk-based assessments (for which there is: see [http://www.archaeologists.net/sites/default/files/node-files/DBA2012-New\\_Format.pdf](http://www.archaeologists.net/sites/default/files/node-files/DBA2012-New_Format.pdf)) is unclear and needs to be addressed.

The Institute would be happy to give oral evidence if required. 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, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch  
Senior Policy Advisor

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<sup>1</sup> [http://www.archaeologists.net/sites/default/files/node-files/IfA-Response-to-Consultation-on-Positive-Planning-Proposals-to-Reform-the-Planning-System-in-Wales-\(WG20088\).Final\\_.pdf](http://www.archaeologists.net/sites/default/files/node-files/IfA-Response-to-Consultation-on-Positive-Planning-Proposals-to-Reform-the-Planning-System-in-Wales-(WG20088).Final_.pdf)