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BUILDING · CONSERVATION

Making Heritage Work

Sustainable Development Bill Team
Welsh Government
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Dear Sirs

A SUSTAINABLE WALES : BETTER CHOICES FOR A BETTER FUTURE

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. Our responses to the consultation questions are as follows:

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?

We strongly support this but comment as follows:

- We note that there is no definition yet for "sustainable development" and that this will follow on the Bill. At this juncture we wish to press for the conservation of heritage assets and their appropriate adaptation to meet the needs of 21st Century communities to be included in the definition. Recent Welsh Government policy has strongly supported the importance of this and we think it should be followed through with full recognition in the definition of sustainability. We think this general approach is supported by the Consultation document at paragraph 1.10 (and elsewhere – and our emphasis):

*"As well as encompassing economic and environmental wellbeing and the wellbeing of future generations, the definition also reflects the vital importance of social justice, equality and **Wales' rich culture.**"*

- This proposal fits well with recent initiatives by the Welsh Government to give local communities more control over the future of their culture and heritage.
- It is to be regretted, on the other hand, that a recent consultation on the future Heritage Bill for Wales envisages the possibility of more centralized delivery of heritage conservation. In response to that consultation we are commenting that such proposals are contrary to the commendable direction of travel towards local administration and control as envisaged by this Consultation and in other policy documents.
- We note that the proposals are not costed and expect that they be accompanied by the necessary support in both guidance and resources.

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

We support this aspect of the proposals in principle, but would wish to see heritage interests represented on the Advisory body and amongst its support staff.

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?

We have no objection to the tiered approach, which seems sensible. However, we would like to see Guidance issued that promotes the adoption of the Bill's principles as early as possible and not just in response to the introduction of the duty.

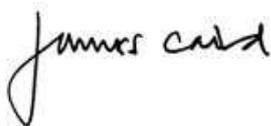
Question 4. What are your views on the proposals to improve the accountability framework for sustainable development in Wales?

We think that proper accountability and reporting is an essential component of the proposals. We think that the duty to report should go further than just a requirement to reference the Act. There should be specific requirements to report the adoption of policy, monitoring of outcomes and the impact of policy on them and specific programmes and projects that are carried out. Nevertheless, using the existing mechanism of Annual Reports is a sound one as it avoids a separate tier of Reporting.

Question 5. We have asked four specific questions. Do you have any related issues which we have not specifically addressed, for example with regards the implementation of the proposals? Please use the consultation response form to express your views.

We have noted above that there seems to be no reference to resources. Clearly the new body will require proper Government support; but other bodies, on whom the duties will fall, will have costs attached to the implementation of the proposals. In our view it would be unreasonable to suppose that because the proposals are to be embedded in mainstream policy and programmes that there will be no attaching costs. These need to be realistically evaluated and provided for.

Yours faithfully



James Caird
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