

Communities, Equality and Local Government Committee

Inquiry into the Welsh Government's Historic Environment Policy

Response from RenewableUK's

Dear Madam or Sir,

Inquiry into the Welsh Government's historic environment policy - Comments by RenewableUK Cymru

This document outlines RenewableUK's comments on the Inquiry into the Welsh Government's historic environment policy. These are limited at this time but we will be interested in following the committee's work on this subject ahead of the proposed Heritage Bill. In preparing our response we have consulted with our Welsh members and other member organisations with a particular expertise in heritage issues.

RenewableUK is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with just under 700 corporate members, RenewableUK is the leading renewable energy trade association in the UK. Wind has been the world's fastest growing renewable energy source for the last seven years, and this trend is expected to continue with falling costs of wind energy and the urgent international need to tackle CO₂ emissions to prevent climate change.

Please feel free to contact me on 02920 220 700, or matthew.williams@renewableuk.com should you require any additional information.

Yours sincerely

Matthew Williams

Policy Officer

RenewableUK Cymru

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Introduction

RenewableUK Cymru welcomes the publication of the consultation on Planning for Sustainability – The Presumption in Favour of Sustainable Development. We are pleased to provide this response on behalf of the wind, wave and tidal energy industry.

RenewableUK (formerly BWEA) was established in 1978 and is the representative body for companies active in the UK wind, wave and tidal energy market. We represent all aspects of the renewables industry from manufacturers of the technology, through to developers and installers, legal and environmental specialists, construction and investment firms. We also have members in the education and training sector – helping to develop the skills needed for the future. As the largest renewable energy trade association in the UK, our membership has grown rapidly over recent years and now stands at just under 700 companies - representing the vast majority of all grid connected renewable energy projects currently installed.

In 2006, a branch of the organisation was established to champion the wind, wave and tidal renewable energy technologies in Wales with a focus of achieving the Welsh Assembly Government's 2010 renewable energy targets. This submission is made on behalf of RenewableUK Cymru Strategy Group. We would be pleased to clarify any issues raised in this paper and offer any further information which may be required.

Renewable Energy Context

All areas of the UK will need to significantly increase their levels of renewable energy generation. In addition, given the large number of power stations which will close and require replacement over the next fifteen years, it is essential that we take this opportunity to rebuild our energy infrastructure – at a local as well as national scale – using renewable and low carbon technologies wherever possible. The contribution of renewable energy to carbon reduction and climate change objectives; job creation and other local benefits; and the stabilising of energy prices should therefore be recognised, together with the need to meet our energy needs and preserve the environment. This is in line with the national policy context in Wales and the UK.

The UK is under a legal obligation under EU Directive 2009/28/EC of June 2009, and failure to deliver the renewable energy generation needed (i.e. 15% of energy consumption from renewable sources by 2020) could leave the UK liable to infringement proceedings by the European Commission.

The renewable energy policy context in Wales is set by the introduction of TAN8 and the 2010 Energy Policy Statement, which radically increased the renewables target for 2025. This was confirmed by a written statement from the Welsh Assembly Government in June 2010. Planning Policy Wales 2011 also states that planning policy at all levels should facilitate delivery of both the Welsh Government's overall Energy Policy Statement and UK and European targets on renewable energy, heritage protection policy is part of the planning context in Wales and is therefore of material importance in delivering on this commitment.

Responses to Consultation Questions

- *How appropriate and successful are the current systems employed by the Welsh Government for protecting and managing the historic environment in Wales?*

In the past our members have experienced an overly precautionary approach in application of policies to protect historic environments, most often at the local level. For example, additional arbitrary buffers have been applied to some historic landscapes, with little acknowledgment that most of these in themselves are man altered landscapes. This is a point set out quite clearly in technical guidance provided by the Statutory consultees who recognise that some development is inevitable. However, this guidance often appears to be misinterpreted at the local level to imply that any change in the environment in or around these areas should be restricted or prohibited.

In responding to our call for comments on this consultation a member organisation noted that the role of Cadw as a part of the Welsh Assembly Government (AGSBs) sponsored bodies enables a much more rapid response to immediate threats than is the case in England.

- *How well do the policies for the historic environment tie in with wider Welsh Government policy objectives (such as the regeneration of communities)?*

There is, and will be an inevitable tension between Welsh Government's desire to drive forward economic development and the preservation of Wales' historic environment. However, developers will always seek to site developments sensitively and in line with Government policy.

In this light, policies must be clear and adhered to at all levels of Government. The Government should also seek to ensure that Assembly Government sponsored bodies are resourced sufficiently to provide quality advice in a timely manner on matters such as these, in line with the Welsh

Government's wider priorities for Wales. We would also welcome a clearer consultation process on the impact of development on historic environments with CADW.

In general terms, we feel policy should recognise that the landscape is continually changing and consider how development and regeneration can complement heritage assets and associated objectives, rather than a potential approach which emphasises 'status quo' as the preferred option in all cases

- *What would be the advantages and disadvantages of merging the functions of the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) with the functions of other organisations, including Cadw?*

RenewableUK have previously queried why the Welsh Government did not consider merging the functions of Cadw into the Single Environment Body, as there seems to be a natural fit in terms of reducing bureaucracy and streamlining the planning process. This point was included in our response to the consultation on the Natural Environment Framework. We do not envisage any significant reason why statutory bodies dealing with the historic environment should not have their functions merged. We also note that in terms of the protection of landscape in a more holistic way, the relationship between the cultural heritage advisors and CCW is of significant importance. Merging the bodies may also result in better coordination of responses, as we have previously seen different bodies give conflicting advice or opinions. In addition to considering the merger of RCAHMW and CADW (possibly into the Single Environment Body), some of our members feel the Welsh Government may also wish to consider merging the functions of more local/ regional bodies under the umbrella of any new body (such as Clwyd-Powys Archaeological Trust etc) as they currently receive funding from CADW for their administrative functions.

We do however have concerns that a new body would not be adequately resourced to properly carry out its functions, and would seek reassurances that mergers would increase working effectiveness and are not simply a method of driving down costs.