



## INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Madam

### **Consultation on Draft New Planning Policy Statement 22 (PPS22): Renewable Energy**

I refer to the above consultation document.

The Institute of Historic Building Conservation is the professional body representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. 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.

The IHBC strongly and actively supports the sustainability agenda. Sustainable energy sources are especially crucial and the PPS is welcomed in principle. However, the document needs to be far wider and more robust in its approach. It needs to provide a clear framework and joined-up approach to the issue. Key issues are as follows:

1. The document needs to link to other PPS guidance, and in due course to a new Sustainability PPS. Key links should be forged with PPS1 and PPS3. There needs to be integration with the general sustainability agenda which is often quoted in recent government documents, but needs to be backed by achievable policies (sustainable communities etc.). An additional guidance document on siting, location, design and impact should sit alongside this guidance.
2. If central government is committed to creating sustainable communities then this PPS presents a real opportunity to provide a holistic overview. The document should not focus solely on special sustainability projects, but also on renewable energy and new development e.g. CHP plants, solar power, aquifers, natural ventilation, vertical turbines, solar gain, materials of low embodied energy, etc.
3. The document appears to be targeted at providing a platform for large-scale renewable energy firms to gain permission for their government driven schemes. There is a risk of the document being seen as promoting a narrow private business interest, rather than addressing wider

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environmental issues. If these issues are ignored, then certain developments will blight surrounding areas for years to come.

4. The document should talk about renewable energy in conjunction with large and small-scale developments and provide the linkages mentioned above. The ability of new buildings to function efficiently, with low energy demands, thereby reducing the strain on the national grid, needs to be a key theme in the guidance.
5. A housing numbers figure should be added, indicating where renewable energy should be considered within a scheme, much like PPG 3.
6. In certain areas smaller scale projects could offset the need for larger more intrusive projects. Communities will always have difficulties in engaging with larger renewable energy projects if there is little relevance to local or smaller schemes.
7. The International designation list misses World Heritage Sites (point 8 page 6). The national designation list misses Scheduled Ancient Monuments, Registered Parks and Gardens, Listed Buildings and their curtilage and setting (point 9 page 7). The local designation list misses Conservation Areas and locally listed buildings (point 12 page 7).

I trust that these comments are helpful.

Yours faithfully

Dave Chetwyn  
Consultations Secretary