

Contact: Richard Cartwright
Tel: 01236 616537
Fax: 01236 616206
E-mail: CartwrightR@northlan.gov.uk
Date: 29 January 2010
Our Ref: IHBC/01/10/RC
Your Ref:



Permitted Development Rights for Domestic Micro-Wind Turbines
and Air-Source Heat Pumps Consultation
Directorate for the Built Environment
The Scottish Government
2H (Bridge), Victoria Quay
Edinburgh EH6 6QQ

Richard Cartwright
IHBC Scotland
Consultations Secretary
c/o NLC Environmental Services
Fleming House,
Cumbernauld G67 1JW
www.ihbc.org.uk

Dear Sirs,

CONSULTATION ON PD RIGHTS FOR DOMESTIC MICRO-WIND TURBINES AND AIR-SOURCE HEAT PUMPS

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.

The Scottish Branch of the Institute welcomes the opportunity to comment on this consultation paper and has the following comments to make on the document. These comments are restricted to the built heritage implications of the proposed PD Rights.

1. On a general note, this Institute recognises the Scottish Government commitment to combating climate change through a wide range of measures. This includes encouraging domestic households to make their contribution to reducing the production of fossil fuels by means of microgeneration. However, we would wish to see this done in a manner that does not have an adverse impact on the quality and appreciation of Scotland's historic environment. The measures as currently proposed to expand PDR's have the potential for significant adverse impacts.

2. Paragraphs 35 and 36 are in general welcomed by this Institute, however paragraph 35 implies that only installations on the main façade of a building facing a highway would be visible to the public. Paragraph 36 implies there could be no adverse impact on CA character from any heat pump not visible from a road. The Institute would wish for these references to be amended to reflect the fact that microgeneration equipment may be seen from wider public viewpoints, not just a road- with potential adverse affects. The phrase "visible from a road or other public vantage point" should therefore be used instead.

3. Listed Buildings are referred to at the end of Paragraph 35 as being protected, however there may be cases where a renewables site lies outwith a LB curtilage but where development would still affect the setting of a listed building, and this needs to be controlled to ensure no adverse affect.

Contd/

Registered Office: 3 Stafford Rise, Tunbridge Wells, Kent, TN2 4QZ
Registered as a Charity: No. 1061593
Company Limited by Guarantee; Reg. in England; No. 3333780

4. The location on a building or within a site of a wind turbine has an impact on its efficiency. It may be that there are several locations, of differing visual impact to built heritage, which would afford equivalent generating value, in which case the lowest impact location should be required. On some buildings there is no good location: owners may want to 'do their bit' but their site might not lend itself to micro-renewables. On some buildings the best, or indeed only viable, location may be in a visually intrusive location, but in this case the development should not be permitted. The IHBC would like to suggest a requirement for an assessment of possible locations for micro-renewables to be submitted, before any installation is approved or permitted, which would impact on the defined historic environment.

5. The Institute welcomes the fact that a system of Prior Notification is included in the consultation proposals, for free-standing renewables structures, to allow the Planning Authority to initially assess impact on amenity and heritage, and to determine an application where necessary. This was a suggestion we had made in our response in May 2008 to the PD for Domestic Micro-regeneration Equipment Consultation then.

The Scottish Branch of the Institute would be grateful if you could consider these points in the review being undertaken of Permitted Development Rights for domestic micro-wind turbines and air-source heat pumps.

Yours sincerely,

Richard Cartwright
Scottish Consultations Secretary
Institute of Historic Building Conservation