



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs

**PERMITTED DEVELOPMENT RIGHTS FOR SMALL SCALE RENEWABLE AND LOW CARBON ENERGY TECHNOLOGIES, AND ELECTRIC VEHICLE CHARGING INFRASTRUCTURE**

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.

The Institute is highly supportive of the Government's commitment to tackle climate change and supports many of the proposals in the consultation paper. However, we feel that the proposals give insufficient attention to the need to protect heritage assets from inappropriate development.

We acknowledge the need for historic buildings and areas to contribute to the tackling of climate change, but feel this should be done on the basis of the careful consideration of visual and other impacts of the proposal, including consideration of alternative less damaging approaches, than the wider deregulation proposed in the consultation.

We are dismayed that the Options assessed in the impact assessment are only those of the proposals and "doing nothing". It appears to us that, within the proposals as a whole, there are many potential impacts to heritage interests which would benefit from individual assessment. It is probable that some of these would contribute little deregulatory benefit in any case.

**Visual impacts**

The Institute is concerned that the potential for visual impact in designated areas is understated. The potential for adverse visual impact of wind turbines and solar panels in

World Heritage Sites and conservation areas goes far beyond immediately adjacent highways. Many such sites are sloping and rooftop and skyline developments may be seen across considerable areas. Because the assessment of impact under the proposals will be up to the developer to decide, as he does not have to make an application, cases are unlikely to come to attention until they have already been installed. This would greatly add to the burden of regulation and, potentially, cost to the developer beyond that suggested in the impact analysis.

Where sites have visual sensitivity, there will often be circumstances in which alternative but lower impact siting is possible. The Institute would like to see the proposals include mechanisms to facilitate negotiation of such alternative siting. This could be done through prior notification procedures.

Consequently the Institute would like to see wind turbines and solar panel arrays on roofs omitted from the proposals in conservation areas and World Heritage Sites; and in answer to the specific question in the first bullet point of paragraph 2.31, we think the provisions should be more, rather than less, restrictive.

We are also concerned about impacts of wind turbines on other Article 1(5) land. National Parks, AONBs and the Broads have widely differing landscape characters and we think it is unsafe to apply a generalized assessment of potential impact to them. The Broads, in particular, and other flat protected landscapes are vulnerable to the visual impacts of wind turbines. We would like to see prior notification procedures apply in these areas.

Whilst these issues have been raised in the impact assessment, there is no assessment of an Option which takes these comments into account. Thus it is not possible to say whether the deregulation proposed would deliver the savings supposed in these cases.

### **Listed buildings and scheduled monuments**

The Institute supports the exclusion of these from the proposals. We note, however, that there is no mention of the setting of listed buildings and ancient monuments which are protected by the Planning Acts in other contexts. We think it would be greatly regrettable if the proposals gave rise to views of heritage assets (some of which have tourism as well as cultural significance) were to be spoiled by injudicious installations of wind turbines and solar panels. The potential for this does not seem to have been addressed in the impact assessment.

### **Archaeologically sensitive areas**

The Institute believes the proposals for such areas to be unsatisfactory. The Government appears to agree with us that such areas should be protected from inappropriate groundworks and yet places the matter entirely in the hands of the installer who will have no idea whether a particular area is sensitive or not. Moreover, even if it is, there appears to be no mechanism for triggering a planning application.

### **Noise**

We think the proposals for limiting noise impacts are set too high. 45dB is likely to be regarded by many as intrusive particularly bearing in mind the wide range of ambient noise levels in differing locations and times of day and night. For this to be a matter of post-installation assessment by planning authorities is bound to have an implication for enforcement workloads. This is recognized in the impact assessment but the monetized cost (which is, seemingly, a proxy for the investigation of all complaints to local authorities) seems to be a very low range bearing in mind the cost of the inevitable litigation.

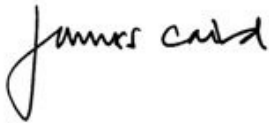
### **On-street charging points**

The Institute notes that by including these in Part 12 of the Order, no size limit will be specified. We would prefer on-street charging points to be subject to the same provisions as off-street ones suggest that they be included together in a separate part of the Order.

### **Impact assessment**

The impact assessment is based on so many assumptions that it is almost impossible to comment on. However, the Institute suggests that the relatively small overall annual benefit of £3,000 to £8,000 in carbon savings is outweighed by the very considerable potential for loss of property values caused by injudiciously designed, placed, maintained and operated equipment and the detrimental effects this will undoubtedly have on the cultural value of the nation's built and natural landscapes.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator