



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

MICROGENERATION AND LOW CARBON ENERGY TECHNOLOGIES

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. We have completed the consultation, which is attached. You will see that we have 2 main concerns.

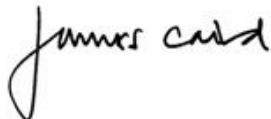
1. The potential impact that wind turbines can have on conservation areas. Because of their size, this impact can extend to well beyond highways bounding the site. In fact, wind turbines sited behind buildings may be completely unseen from a close-at-hand position because of the size and siting of buildings on the site, but be very obtrusive from slightly further away. We would urge more restrictive conditions on these to cover visibility from any public viewpoint within a certain radius – say 100m.
2. The potential impact of ground source heating systems and wind turbine developments (which have considerable below-ground disturbance) on archaeology.

Recently issued Planning Policy for Wales requires archaeological investigation in many circumstances: *"where nationally important archaeological remains, whether scheduled or not and their settings are likely to be affected by proposed development there should be a presumption in favour of their physical preservation in situ"*. Note that this requirement includes non-designated sites as well as designated ones like scheduled monuments. There is no mechanism in the proposals for dealing with this requirement in cases that could be very damaging to archaeological interests.

In fact, if implemented, the proposals would give rise to the potential paradox that a development which was not PD because of its position on the site might require a full archaeological investigation, but in another location on the same site would not require investigation.

We hope our comments are useful.

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

	CONSULTATION QUESTIONS	Y	N	Comment
General				
Q.1	Do you agree with the proposals to limit noise impacts? If not, what alternative would you suggest?		N	Resonant noise can be particularly annoying to residents particularly at night and at much lower volumes than suggested in the draft conditions. This can be exaggerated by the nature of the structure to which a device is attached. The Institute would like to see more cautious restrictions than those currently proposed.
Q.2	Do you agree that the requirement to have MCS certification is appropriate? If not, what alternative would you suggest?	Y		MCS certification gives all stakeholders confidence that minimum standards are being maintained.
Q.3	Do you agree with the proposals to allow anemometer masts where the subsequent turbine would also be permitted development, subject to the anemometer mast having a maximum height equivalent to the relevant permitted development limit, a maximum 12 month trial period and a removal condition?	Y		It seem reasonable to allow facilities to test feasibility, but these should not be permanent as they would, presumably, have lower design standards.
Non-domestic proposals				
Q.4	Do you agree with the proposals for wind turbines on non-domestic premises, as set out in Tables 1 and 2?		N	The Table 1 proposals for protecting the character and appearance of world heritage sites and conservation areas is inadequate. Because of their size, wind turbines tend to be visible from public viewpoints far beyond their immediate surroundings and this can seriously affect the character and appearance of conservation areas which, by definition, are supposed to be worthy of protection and enhancement. Wind turbine development can also be destructive of archaeology. The more restrictive Table 2 proposal should also apply to Table 1. Care needs also to be exercised in relation to devices attached to structures which may add to noise problems through resonance and transmission through building fabric. Many non-domestic premises are close to residential property. In such cases the same prohibition as for domestic property should apply. On industrial estates etc. a more relaxed regime could apply.
Q.5	Do you agree with the proposals for air source heat pumps on non-domestic premises, as set out in Table 3?	Y		
Q.6	Do you agree with the proposal for ground and water source		N	Ground disturbance of this type should not be allowed on archaeological sites. It is not

	heat pumps on non-domestic premises, as set out in Table 4?			clear why ground source heat pumps are proposed to have PD rights on non-domestic property only (unless they are already PD on domestic property).
Q.7	Do you agree with the proposals for solar panels on non-domestic premises, as set out in Tables 5, 6 and 7?	Y		
Q.8	Wall mounted solar panels visible from a highway bounding the site are to be excluded from permitted development in world heritage sites and conservation areas, should wall mounted panels also be excluded entirely within town centre areas as proposed in Table 6? If so, how should town centre be defined?	Y		Most town centres are already defined in Development Plans for other purposes. Many town centres are also in conservation areas.
Q.9	Stand alone solar panels visible from a highway bounding the site are to be excluded from permitted development in world heritage sites and conservation areas (Table 7), should this be extended to national parks and areas of outstanding natural beauty?	Y		The maximum array size is 9m ² . This is likely to have landscape impacts in some instances. National Parks and AONBs are often in hilly country which provides wider landscape views than elsewhere.
Q.10	If the maximum height of stand alone panels (Table 7) is reduced could the area of array allowed be increased without undue impact? If so what area of array would be appropriate?	Y		4m ² might be appropriate.
Q.11	Do you agree with the proposal for flues for biomass systems and combined heat and power (CHP) systems on non-domestic premises, as set out in Table 8?	Y		The limits proposed seem appropriate.
Agricultural and forestry proposals				
Q.12	Do you agree with the proposal for structures to house, biomass boilers, anaerobic digestion system and associated waste and fuel stores on agricultural and forestry premises as set out in Table 9?	Y		The limits proposed seem appropriate.
Q.13	Do you agree that prior notification procedure is the most appropriate way of controlling hydro-turbine equipment on agricultural and forestry premises as set out in Table 10?	Y		This works reasonably well for other forms of development.
Domestic proposals				
Q.14	Do you agree with the proposal	Y		The Institute agrees that there are too many

	<p>that there should not be permitted development rights for domestic building mounted turbines?</p> <p>If not, then should building mounted turbines be allowed:</p> <ul style="list-style-type: none"> a) generally on detached dwellings or outbuildings subject to the thresholds in Annex C? b) only on detached dwellings or outbuildings sited at a minimum distance from a boundary? c) only on detached dwellings or outbuildings located in rural areas (e.g. outside a settlement boundary shown in an adopted development plan for the area)? d) subject to limitations other than those suggested at a) to c) (please specify in your response)? 			possibilities for neighbour disturbance for building mounted turbines to be permitted development.
Q.15	Do you agree with the proposals for domestic stand alone turbines as set out in table 11?		N	The tighter restrictions we suggest at Question 4 should apply.
Q.16	Do you agree with the proposals for air source heat pumps on domestic premises, as set out in Table 12?	Y		The limits proposed seem appropriate.
Q.17	In addition to the current permitted development rights for domestic solar panels do you agree with the proposals for panels sited on flat roofs as set out in Table 13?	Y		The limits proposed seem appropriate.
Q.18	We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.			The Institute is very concerned that no recognition has been given to the fact that some of the proposals are potentially very damaging to archaeology. Please see our letter for details of this.
Glossary of terms – Annex A				
Q.19	Do you agree with the definitions used for the purposes of this document?	Y		

Q.20	Do other concepts or technologies need specific definitions?		N	
Consultation Stage Impact Assessments – Annex B				
Q.21	Do you think that the impact assessments provide an accurate assessment of the likely costs and benefits of the preferred policy options?			The Institute has no comments on this aspect.