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Permitted Development Rights for Domestic Micro-Wind Turbines
and Air-Source Heat Pumps Consultation
Directorate for the Built Environment
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To Whom It May Concern:

Permitted Development Rights for Domestic Micro-Wind Turbines and Air-Source Heat Pumps Consultation

Thank you for the opportunity to comment on this consultation.

Built Environment Forum Scotland (BEFS) is a forum that brings together 21 non-governmental organisations – both professional and voluntary – that work within the built environment sector. The purpose of BEFS is to raise awareness of policy issues within the sector, encourage debate and share information, with a view to influencing policy and legislation.

On a general note, BEFS supports the Scottish Government's commitment to combating climate change, and its efforts to help households become more sustainable through microgeneration of renewable energy.

BEFS welcomes the proposals that permitted development rights will not be granted for wind turbines in World Heritage Sites, Conservation Areas and within the curtilage of listed buildings, and that ASHP would be excluded from permitted development in World Heritage Sites. However we consider that wind turbine and ASHP installations affecting Inventory Gardens & Designed Landscapes and the new Battlefield designations should also be excluded from Permitted Development Rights.

We also welcome that a system of Prior Notification for free-standing renewables structures is proposed, to allow the Planning Authority to initially assess impact on amenity and heritage, and to determine an application where necessary.

Relating to ASHP in Conservation Areas, we have concerns that the proposal may still have a negative impact on the built heritage value. While we agree that installations on the main façade of a building facing a road would have the greatest impact, microgeneration equipment may also be highly visible from wider public viewpoints. We therefore suggest that the phrase "visible from a road or other public vantage point" should be used instead.

We also think that the amended permitted development rights should ensure that a wind turbine installation outwith a listed building curtilage does not adversely affect the setting.

Guidance should be given to the public and to local authorities to prevent such structures from impacting negatively on the setting of any designated heritage area.

We hope these comments are useful – please get in touch if you require any further clarification. We would be grateful if you could keep us informed on the outcome of this consultation process.

Yours sincerely



Pernilla Rinsell
Forum Co-ordinator

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