

IWEA Response to the Consultation on Proposed Permitted Development Rights for Microgeneration Development

27th January, 2010

IWEA welcome the publication of this consultation and the opportunity to respond. We welcome the proposal to have permitted development rights for microgeneration units so that development can proceed without the need for a planning application, since planning permission for them is deemed to be granted. This is a positive step towards contributing to renewable energy targets, and encouraging demand side management of the use of electricity.

IWEA has some concerns over the permitted development rights as proposed. In the background section of the paper it states that "Microgeneration is generally regarded as a renewable or low carbon technology with a rated output of between 45-50kW", however the permitted development rights for wind turbines are limited to 2.5kW. The limit of 2.5kW is lower than the level of 6kW that is regularly used for microgeneration for domestic use. The levels permitted should be higher for non-domestic use to reflect the increased on-site demand that is likely to exist. The permitted development should be in line with the demand of the site. The limit of the turbine height to 15m is also quite restrictive for non-domestic developments.

There appears to be some inconsistency in the treatment of horizontal axis and vertical axis wind turbines, with larger swept areas being permitted for vertical axis wind turbines.

IWEA also has some concerns over the amount of emphasis being placed on building mounted turbines in this consultation. In our response we have highlighted some of the particular installation considerations in relation to building mounted turbines and propose more of a focus on free standing turbines. We do support that there are situations where building mounted turbines are suitable, however, we believe that these developments should only be carried out by chartered structural engineers who are qualified to assess the structural impact.

IWEA has provided answers to some of the specific questions in the response form which is attached.



**PERMITTED
DEVELOPMENT RIGHTS
FOR MICROGENERATION
DEVELOPMENT
CONSULTATION PAPER
RESPONSE FORM**

Once you have completed this form please
return to

Policy and Legislation Branch
3rd Floor
Millennium House
Great Victoria STREET
Belfast
BT2 7BN

by fax (marked 'Planning Microgeneration PD
Consultation Response') to:
028 9041 6960

Or by e-mail to:
Planning.microgenpd@doeni.gov.uk

All responses should be submitted to the
Department no later than 22nd January 2010



Department of the
Environment
www.doeni.gov.uk



INVESTORS IN PEOPLE

RESPONDENT INFORMATION

Please Note that this form **must** be returned with your response to ensure that we handle your response appropriately.

In keeping with our policy on openness, the Department will make responses to this consultation paper publically available. When publishing responses received on behalf of organisations the Department will also publish the organisation's name and address. When publishing responses received on behalf of individuals the Department will not publish details of the individual's name and address.

1. Name/Organisation

Organisation Name

Irish Wind Energy Association

Title

Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

[REDACTED]

Forename

[REDACTED]

2. Postal Address

[REDACTED]

Postcode:

[REDACTED]

Phone:

[REDACTED]

Email:

[REDACTED]

3. Are you responding:

As an individual

On behalf of a group / organisation

4. Which of the following best describes the capacity in which you are responding:

Developer

Agent/Architect

Business

Member of Public

Environment Group

Council / Councillor

MLA, MP, MEP

Other Please state:

Trade Association

5. Acknowledgment

Individual responses will not be acknowledged unless specifically requested

NON DOMESTIC MICROGENERATION

Introduction

Question 1

Do you agree that the GDO should be amended to provide permitted development rights for microgeneration equipment in non-domestic land uses?

Yes No

IWEA welcome the proposal to amend the General Development Order to provide permitted development rights for microgeneration equipment in non-domestic land uses.

Question 2

Should permitted development rights for non-domestic microgeneration be greater than those proposed for dwellinghouses where this can be achieved without increasing the risk of adverse impacts?

Yes No

The rights should be linked and proportioned to the electrical/heating load of the site/building.

Question 3

Should permitted development rights for microgeneration associated with non-domestic land uses be provided for in a separate part within Schedule 1 of the GDO from the existing permitted development rights for those land uses?

Yes No

IWEA does not hold a strong view on where GDO text should be located within legislation.

General limits and conditions to permitted development

Question 4

Do you agree that permitted development in non-domestic land uses should be for microgeneration development that primarily provides heat or energy for use within the curtilage of the non-domestic building or on the agricultural unit?

Yes No

IWEA believe the use of energy generated onsite generation is not a planning issue, and should not be conditioned within GDO requirements. Indeed it also could be difficult and problematic to adequately define, and indeed enforce, such requirements. It is likely however that the microgeneration development will primarily only provide heat and electricity for use within the cartilage of the non-domestic building or on the agricultural unit. There should also be the possibility of exporting excess generation onto the grid.

Question 5

Do you agree that, subject to the maximum height and area restrictions set out in the Review, permitted development for solar panels or wind turbines erected by undertakers referred to in Part 13 of the GDO or by the Roads Service to meet the energy needs of a range of equipment, systems and other uses permitted under Part 13 of the GDO or by the Roads Service should be allowed, provided it is only to meet the needs of the equipment, systems and other uses with which it is associated?

Yes No

In the case of electricity generation, every opportunity should be made to use the equipment as efficiently as possible and to export when there is excess generation. This will assist with financial viability of system, resulting in project replication to reduce costs. This will become very important in the case of public street lighting systems.

Question 6

Do you agree that a condition of all permitted development for microgeneration devices in non-domestic land uses should be that they be removed as soon as reasonably practicable after they are no longer in use and the land or building restored to its condition before the development took place?

Yes No

Microgeneration devices should be removed if the equipment is no longer in operation. However opportunities must be allowed for upgrade, re-energise and replacement of systems.

Solar Panels

Question 7

Do you agree that permitted development for solar panels fitted to a pitched roof should be limited to the existing roof area?

Yes No

Question 8

Do you agree that permitted development for solar panels fitted to a pitched roof should be limited to the maximum height of the existing roof?

Yes No

Question 9

Do you agree that permitted development for solar panels on a pitched roof plane that faces onto and is visible from a road should not extend more than 20cm above the plane of the existing roof slope?

Yes No

Question 10

Do you agree that permitted development for solar panels on a flat roof should not exceed a height of 2m from the roof plane on which they are mounted?

Yes No

Question 11

Do you agree that solar panels permitted on a flat roof should be located at least 2m from the edge of the roof of the building on which they are mounted?

Yes No

Question 12

Should permitted development rights for roof mounted solar panels be removed in AONBs and National Parks where the roof slope faces onto and is visible from that road?; or

Yes No

Question 13

Should permitted development rights for roof mounted solar panels be removed in special countryside policy areas where the roof slope faces onto and is visible from that road?; or

Yes No

Question 14

Should permitted development rights for roof mounted solar panels in AONBs and National Parks (including special countryside policy areas) be subject to the same limits that apply outside these areas?

Yes No

Question 15

Should permitted development rights for roof mounted solar panels in Conservation Areas be removed where the roof slope to which they are fitted faces onto and is visible from that road?; or

Yes No

Question 16

Should permitted development rights for roof mounted solar panels in Conservation Areas be subject to the same limits that apply outside these areas?

Yes No

Question 17

Should permitted development rights for roof mounted solar panels in a World Heritage Site be removed where the roof slope to which they are fitted faces onto and is visible from that road?; or

Yes No

Question 18

Should permitted development rights for roof mounted solar panels in a World Heritage Site be subject to the same limits that apply outside that area?

Yes No

Question 19

Should there be any additional restrictions to permitted development rights for roof mounted solar panels in ASSIs and Sites of Archaeological Interest?

Yes No

Question 20

Should permitted development rights for roof mounted solar panels within the curtilage of a Listed Building only be removed where Listed Building Consent has not previously been granted?

Yes No

Question 21

Should permitted development rights for solar panels fitted to a wall limit them to the boundaries of the existing wall area?; or

Yes No

Question 22

If you do not agree that permitted development rights for solar panels fitted to a wall should be limited by the existing wall area do you think that there should be an area limit to wall mounted panels and, if so, what area should this be?

Question 23

Should permitted development rights for solar panels fitted to a wall within 3 metres of the boundary of the curtilage and extending above 4 metres in height be restricted to protrude no more than 20cm from the plane of the wall?

Yes No

Question 24

Should permitted development rights for wall mounted solar panels be removed in AONBs, National Parks, Conservation Areas and World Heritage Sites where they face onto and are visible from a road?

Yes No

Question 25

Do you agree that permitted development rights for wall mounted solar panels in ASSIs and Sites of Archaeological Interest should not be subject to additional restrictions?

Yes No

Question 26

Should permitted development rights for wall mounted solar panels within the curtilage of a Listed Building only be removed where Listed Building Consent has not previously been granted?

Yes No

Question 27

Should permitted development rights for free standing solar panels restrict them to a minimum of 5m from the building curtilage and from any road bounding the curtilage?

Yes No

Question 28

Should permitted development rights for free standing solar panels restrict them to a maximum of 2m above ground level? If not, what height do you believe is appropriate and for what reasons?

Yes No

Question 29

Should the permitted development rights for free standing solar panels allow a maximum surface area of 20m² within the curtilage of a building?

Yes No

Question 30

If you consider a greater area should be allowed, please state what area and the supporting reasons.

Question 31

Do you agree that the proposed restrictions on permitted development rights for free standing solar panels are reasonable in addressing safety issues beyond the host property?

Yes No

Question 32

Should permitted development rights for free standing solar panels be removed in AONBs, National Parks, Conservation Areas and World Heritage Sites where the installation faces onto a road and is visible from that road?

Yes No

Question 33

Should permitted development rights for free standing solar panels be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Question 34

Should permitted development rights for free standing solar panels within the curtilage of a Listed Building only be removed where Listed Building Consent has not previously been granted?

Yes No

Wind Turbines

Question 35

Should permitted development rights for building mounted wind turbines allow them to be a maximum of 3m above the highest point of the roof?

Yes No

In relation to building mounted turbines, there are a number of installation considerations that need to be taken into account, including ensuring adequate structural integrity of the building. It is essential that these systems are installed by chartered structural engineers who have the expertise to asses the suitability of a buidling for such a development.

The "Warwick Wind Trials" report (1) shows how a selection of more than rooftop wind turbines performed very poorly. There is also a report by the Carbon Trust and the UK Met Office (2) which is quite negative about rooftop mounted wind. It is essential that the suitability of a site for building mounted development is adequately assessed to ensure that it is safe and that it will be able to generate at expected levels.

In the cases where roof mounted systems have been deemed suitable and safe IWEA believes that the height restriction of 3m above the highest point of the roof is overly restrictive. We think that the size of the turbine should be site specific, taking into account the location, wind speed and the energy demand on site.

(1) <http://www.warwickwindtrials.org.uk/>

(2)

<http://www.carbontrust.co.uk/Publications/pages/publicationdetail.aspx?id=CTC738&respons=0&q=wind&o=Rank&od=asc&pn=0&ps=10> (login required)

Question 36

Should permitted development rights for building mounted wind turbines be for a maximum blade diameter of 2.5m?

Yes No

Please refer to Q 35

Question 37

Should permitted development rights for building mounted wind turbines with a vertical axis be for a maximum swept area of 5m²?

Yes No

Please refer to Q 35

Question 38

Should permitted development rights allow one building mounted wind turbine within the curtilage of a non-domestic building?

Yes No

IWEA suggest that two turbines should be allowed, consistent with EIA regulations.

Question 39

If you consider more than one should be allowed, please state how many and the supporting reasons.

Please refer to Q 38

Question 40

If you consider that permitted development rights should allow more than two wind turbines please explain why you consider that the environmental effects are not significant and that the threshold in Schedule 2 to the EIA Regulations should be amended.

Question 41

Should permitted development rights for building mounted wind turbines be deferred until noise and air safety issues can be satisfactorily addressed?

Yes No

The rights should incorporate “Best Available” EU Quality & Product Standards and progress this development to a stage for action at ground level.

Question 42

Do you agree that a permitted development regime for building mounted wind turbines should not entail the user having to employ a technical expert to carry out a noise survey either before such rights are exercised or to prove compliance?

Yes No

IWEA agrees that the onus on minimising noise and vibration impacts should be on manufacturers and professional installers rather than on the owner of the building or land on which a wind turbine may be erected under permitted development rights.

It is in the industry interest to mitigate against the prevalence noise nuisance, which could hold significant potential to damage industry reputation and consumer confidence.

Question 43

Do you agree that it is a matter for installers and manufacturers to ensure that there is no negative impact associated with vibration that may be caused by building mounted wind turbines?

Yes No

Mitigating the effects/generation of vibration require engineering solutions on a site and product specific basis, and this should be a matter for installers and manufacturers.

Question 44

If you do not agree that impacts associated with vibration should be addressed by installers and manufacturers how do you believe they should be addressed?

N/A

Question 45

Should permitted development rights for building mounted wind turbines be removed where they extend above public open space, roads and footpaths?

Yes No

The rights should incorporate “Best Available” EU Quality & Product Standards and progress this development to a stage for action at ground level. No further action is required towards siting requirements.

Question 46

Should permitted development rights for building mounted wind turbines be deferred until a UK scheme has been developed that satisfactorily addresses the issue of radar safety?

Yes No

The rights should incorporate “Best Available” EU Quality & Product Standards and progress this development to a stage for action at ground level.

There currently exists an evidence base which clarifies turbines, exhibiting the scales referred to by GDO building mounted size limits, not to impact aviation assets (e.g. Radar equipment). As such sufficient confidence should exist for the deliver of this area of the policy without delay

Question 47

Do you agree that there is currently no need to condition permitted development rights for building mounted wind turbines in terms of their potential to induce seizures?

Yes No

There is no need to condition permitted development rights for building mounted wind turbines in terms of their potential to induce seizures as in light of current knowledge, this is a sensible approach.

Question 48

Should the potential impact of building mounted wind turbines on telecommunications systems be addressed through the publication of guidance material on the best way to site wind turbines to reduce the risk of electromagnetic interference?

Yes No

This would not seem necessary as the risk of turbine negatively impacting telecommunication equipment is minute.

Question 49

Should the potential impact of building mounted wind turbines on birds and bats be addressed through the publication of guidance material on the best way to site wind turbines to minimise that impact?

Yes No

There is no scientifically robust data or evidence that suggests micro-wind turbines negatively impact bird and bat populations.

Indeed there is a significant volume of anecdotal evidence that demonstrates small scale wind turbine not to impact local bird and bat populations.

Question 50

Should permitted development rights for building mounted wind turbines be removed in AONBs, National Parks, Conservation Areas and World Heritage Sites where the turbine is mounted on a roof or wall that faces onto a road and is visible from that road?

Yes No

This would seem like a reasonable proposal in certain conditions.

Question 51

Should permitted development rights for building mounted wind turbines be removed in ASSIs as a precautionary measure to protect bats and birds?

Yes No

There is no scientifically robust data or evidence that suggests micro-wind turbines negatively impact bird and bat populations.

Indeed there is a significant volume of anecdotal evidence that demonstrates small scale wind turbine not to impact local bird and bat populations.

Question 52

Should permitted development rights for building mounted wind turbines within the curtilage of a Listed Building only be removed where Listed Building Consent has not previously been granted?

Yes No

Question 53

Subject to the further limits outlined later in this paper, should permitted development rights for free standing wind turbines in non-domestic land uses should be allowed up to a maximum height of 15m above ground level?

Yes No

IWEA believes that a maximum height of 15m places an unnecessary restriction on power production. The height and size of the turbine should be proportioned to the energy demand and location of the site, taking into account the improved efficiency of higher turbines. The size of turbine should also take into consideration whether the connection is single phase or three phase.

Question 54

Should permitted development rights for free standing horizontal axis wind turbines allow a blade diameter of up to 6m?

Yes No

IWEA believes that a maximum blade diameter of 6m places an unnecessary restriction on power production. The swept area should be proportioned to the energy demand and location of the site, taking into account the improved efficiency of larger swept areas.

Question 55

If you consider a different blade diameter is appropriate, what is it and please state your supporting reasons.

Please refer to Q 54.

Question 56

Should permitted development rights for free standing wind turbines with a vertical axis allow a maximum swept area of 28m²?

Yes No

Please refer to Q 53.

Question 57

Should permitted development rights for free standing wind turbines require that they are located a minimum of 17m from a neighbouring building curtilage or road?

Yes No

IWEA thinks that the restriction to 15m turbines is excessive, and therefore the limit of 17m is no longer applicable. The turbines should be located a distance of the maximum height of the turbine plus 1m.

Question 58

Should permitted development rights for building mounted wind turbines be deferred until a UK scheme has been developed that satisfactorily addresses the issue of radar safety?

Yes No

Please refer to Q 46.

Question 59

Do you agree that there is currently no need to condition permitted development rights for building mounted wind turbines in terms of their potential to induce seizures?

Yes No

Please refer to Q 47.

Question 60

Do you agree that the risk to members of the public outside the curtilage posed by wind turbines falling over is sufficiently addressed by the requirement for them to be located a minimum of 17m from a neighbouring building curtilage or road?

Yes No

Please refer to Q 57.

Question 61

Should permitted development rights require that the blade tips of a free standing wind turbine must be a minimum of 5m above ground level?

Yes No

Please refer to Q 53.

Question 62

Should permitted development rights for free standing wind turbines allow only one turbine within a building curtilage or on an agricultural unit?

Yes No

IWEA suggests that two turbines should be allowed, consistent with EIA regulations.

Question 63

Do you agree that a separation distance of 34m between free standing wind turbines on neighbouring properties is sufficient to address cumulative visual impact?

Yes No

The distance between turbines should be a design criteria, considering wake effects only, and will be site specific.

Question 64

If you consider that a greater separation distance than 34m between free standing wind turbines on neighbouring properties is required, what is it and please state your supporting reasons?

Please refer to Q63

Question 65

Should the potential impact of free standing wind turbines on telecommunications systems be addressed through the publication of guidance material on the best way to site wind turbines to reduce the risk of electromagnetic interference?

Yes No

See response to question 48.

Question 66

Should the potential impact of free standing wind turbines on birds and bats be addressed through the publication of guidance material on the best way to site wind turbines to minimise that impact?

Yes No

See response to question 49.

Question 67

Should permitted development rights for free standing wind turbines be deferred until noise issues can be satisfactorily addressed?

Yes No

See response to question 50.

Question 68

Should permitted development rights for free standing wind turbines in AONBs and National Parks be required to be located within 50m of the nearest building which will utilise the electricity produced?

Yes No

Having such arbitrary limits would have a negative impact on optimum siting, energy generation, and would deliver little value through enforcement. There is already a strong natural interest for the generator to minimise the proximity of the turbine to the host property on account of the high cost of related cabling. There are many factors that are considered in the siting of wind technology, and this distance would potentially undermine project viability without any benefit being delivered through its enforcement.

It is also noted that noise mitigation may require turbine siting is in excess of the suggested 50m limit, thus rendering the majority of sites unviable within GDO policy.

IWEA recommends no such separation limit is applied, with the confidence that noise requirements, cabling cost, optimum siting will all support a proximity of turbine to host property that recognises best industry practice.

Question 69

Should permitted development for free standing wind turbines be removed in Conservation Areas and World Heritage Sites?

Yes No

IWEA believes that free standing wind turbines should be an option in these areas.

Question 70

Should permitted development rights for free standing wind turbines be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Please refer to Q 69

Question 71

Should permitted development rights for free standing wind turbines within the curtilage of a Listed Building be removed?

Yes No

Listed buildings, in many cases, can be a larger consumer of energy per floor area (due to restrictions on insulation, glazing, lighting other upgrades) and should not be seen to be a burden on the impacts of Climate Change, or suffer large carbon levies.

Hydro

Question 72

Do you agree that there should be no permitted development rights introduced for in-stream works associated with hydro microgeneration in non-domestic land uses?

Yes No

Question 73

Should the provision of a new or replacement turbine house for an existing hydro microgeneration scheme be permitted development provided it is a maximum of 3m in height, has a maximum floor area of 10m² is located at least 5m from the building curtilage and not nearer to any road which bounds the curtilage than the part of the existing building nearest to that road?

Yes No

Question 74

Do you agree that no further restrictions on the permitted development rights for new or replacement turbine houses are necessary in AONBs and National Parks?

Yes No

Question 75

Should permitted development rights for new or replacement turbine houses be removed in Conservation Areas, World Heritage Sites, ASSIs and Sites of Archaeological Interest?

Yes No

Question 76

Should permitted development rights for new or replacement turbine houses associated with existing hydro schemes within the curtilage of a Listed Building only be removed where Listed Building Consent has not previously been granted?

Yes No

Biomass and combined heat and power plants

Question 77

Should a new building or extension to house a biomass or CHP boiler be permitted development provided the new building or extension has a maximum floorspace of 10m² and a maximum height of 3m?

Yes No

Question 78

Should a new building or extension to house a biomass or CHP boiler for non-domestic buildings with a floor area of 1,000m² or more be permitted development provided the new building or extension has a maximum floorspace of 75m² and maximum height of 3m?

Yes No

Question 79

Should permitted development rights for a new building or extension to house a biomass or CHP boiler require that the development is a minimum distance of 5m from any boundary of the building curtilage and not nearer to any road which bounds the curtilage than the part of the existing building nearest to that road.

Yes No

Question 80

Should it be a condition of permitted development rights for the provision of a biomass boiler for non-domestic use that the fuel must not include products derived from animal wastes or wood containing dangerous substances?

Yes No

Question 81

Do you agree that noise impacts from biomass and CHP boilers is a low risk and that this risk is minimised by other restrictions upon permitted development rights for boiler houses?

Yes No

Question 82

Should a new building or extension to an existing building to house fuel for a biomass boiler be permitted development provided the new building or extension has a maximum floorspace of 10m² and maximum height of 3m?

Yes No

Question 83

Should a new building or extension to an existing building to house fuel for a biomass boiler for non-domestic buildings with a floor area of 1,000m² or more be permitted development provided the new building or extension has a maximum floorspace of 75m² and maximum height of 3m?

Yes No

Question 84

Should permitted development rights for a new building or extension to an existing building to house fuel for a biomass boiler for non-domestic buildings be restricted to those located a minimum distance of 5m from any boundary of the building curtilage and not nearer to any road which bounds the curtilage than the part of the existing building nearest to that road?

Yes No

Question 85

Should permitted development rights for a new building or extension only apply to the first biomass/CHP boiler house and the first fuel biomass fuel store erected under permitted development rights within the curtilage of a building?

Yes No

Question 86

Should permitted development rights for the installation of a flue for a biomass or CHP system be allowed provided the height of the flue does not exceed 1m above the highest part of the existing roof?

Yes No

Question 87

Should permitted development rights for the replacement or alteration of an existing flue to allow it to be utilised by a biomass or CHP system be allowed provided the replaced or altered flue is located in the same place as the existing flue and is of dimensions that do not exceed the existing flue?

Yes No

Question 88

For biomass or CHP systems in industrial buildings do you consider the above proposals for permitted development could be replaced by permitted development rights for flues up to a maximum height of 15m above ground level without greatly increasing visual impacts?

Yes No

Question 89

Do you agree that there should be no additional restrictions on permitted development rights for biomass and CHP boiler houses, fuel stores and flues within AONBs, National Parks, Conservation Areas and World Heritage Sites?

Yes No

Question 90

If you do not agree, what additional restrictions do you consider would be appropriate and please state your supporting reasons?

Question 91

Should permitted development rights for biomass and CHP boiler houses and fuel stores be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Question 92

Should permitted development rights for a biomass or CHP boiler house, fuel store or flue only be removed where Listed Building Consent has not previously been granted?

Yes No

Question 93

Should permitted development rights be provided for anaerobic digestion plants on an agricultural unit?

Yes No

Question 94

If you agree that permitted development rights for anaerobic digestion plants should be provided should they be subject to similar restrictions to those for agricultural permitted development rights as outlined ?

Question 95

Should permitted development rights for anaerobic digestion plants be limited to those that use only materials generated on the agricultural unit on which the plant is located?

Yes No

Question 96

Do you agree that permitted development rights for anaerobic digestion plants do not need to be further restricted in AONBs, National Parks, World Heritage Sites or Conservation Areas?

Yes No

Question 97

Should permitted development rights for anaerobic digestion plants be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Question 98

Should permitted development rights for anaerobic digestion plants within the curtilage of a Listed Building only be removed where Listed Building Consent for the development has not previously been granted?

Yes No

Heat Pumps

Question 99

Should permitted development rights be provided for ground source heat pumps in non-domestic land uses, subject to appropriate restrictions?

Yes No

Question 100

Should permitted development rights for ground source heat pumps be restricted to those where the area of excavation does not exceed 0.5ha and the area of excavation is returned to its state prior to the development taking place?

Yes No

Question 101

Should permitted development rights for above ground elements necessary for the operation of a ground source heat pump within the curtilage of a building with floorspace of less than 1000m² be restricted to buildings or extensions that do not exceed 3m in height and of a maximum area of 10m²?

Yes No

Question 102

Should permitted development rights for above ground elements necessary for the operation of a ground source heat pump within the curtilage of a building with floorspace of 1000m² or more be restricted to buildings or extensions that do not exceed 3m in height and a maximum area of 75m²?

Yes No

Question 103

Should the above ground elements necessary for the operation of a ground source heat pump be required to be located a minimum of 5m from the boundary of the building curtilage and from any road, and to be located not nearer to any road that bounds the curtilage than that part of the existing building nearest to that road?

Yes No

Question 104

Do you agree that there should be no additional restrictions upon permitted development rights for ground source heat pumps within AONBs, National Parks, Conservation Areas and World Heritage Sites?

Yes No

Question 105

Should permitted development rights for ground source heat pumps be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Question 106

Should permitted development rights for above ground elements of a ground source heat pump within the curtilage of a Listed Building be removed only where Listed Building Consent for the development has not previously been granted?

Yes No

Question 107

Should permitted development rights be provided for water source heat pumps in non-domestic land uses subject to appropriate restrictions?

Yes No

Question 108

Should permitted development rights for water source heat pumps be restricted to those where the pipework does not exceed an area of 0.5ha?

Yes No

Question 109

Should permitted development rights for above ground elements necessary for the operation of a water source heat pump within the curtilage of a building with floorspace of less than 1000m² be restricted to buildings or extensions that do not exceed 3m in height and an area of 10m²?

Yes No

Question 110

Should permitted development rights for above ground elements necessary for the operation of a water source heat pump within the curtilage of a building with floorspace of 1000m² or more be restricted to buildings or extensions that do not exceed 3m in height and an area of 75m²?

Yes No

Question 111

Should the above ground elements necessary for the operation of a water source heat pump be required to be located a minimum of 5m from the boundary of the building curtilage and from any road, and to be located not nearer to any road that bounds the curtilage than that part of the existing building nearest to that road?

Yes No

Question 112

Do you agree that there should be no additional restrictions on permitted development rights for water source heat pumps within AONBs, National Parks, Conservation Areas and World Heritage Sites?

Yes No

Question 113

Should permitted development rights for water source heat pumps be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Question 114

Should permitted development rights for water source heat pumps within the curtilage of a Listed Building be removed only where Listed Building Consent for the development has not previously been granted?

Yes No

Question 115

Should permitted development rights for air source heat pumps be deferred until noise issues can be satisfactorily addressed?

Yes No

Question 116

Do you agree that a permitted development regime for air source heat pumps should not entail the user having to employ a technical expert to carry out a noise survey either before such rights are exercised or to prove compliance?

Yes No

Question 117

Should permitted development rights for air source heat pumps for buildings with a floor area of less than 1,000m² be restricted to a maximum volume of 30m³ ?

Yes No

Question 118

Should permitted development rights for air source heat pumps for buildings with a floor area of 1,000m² or more be restricted to a maximum volume of 75m³ ?

Yes No

Question 119

Should air source heat pumps be located a minimum distance of 5m from any boundary of the building curtilage and not nearer to any road which bounds the curtilage than the part of the existing building nearest to that road?

Yes No

Question 120

Should permitted development rights for air source heat pumps require that they do not exceed the height of the existing building?

Yes No

Question 121

Do you agree that there should be no additional restrictions on permitted development rights for air source heat pumps within AONBs or National Parks?

Yes No

Question 122

Should permitted development rights for air source heat pumps within Conservation Areas and World Heritage Sites be removed where any external element of the heat pump within the curtilage of the building is mounted on a wall that faces onto a road and is visible from that road?

Yes No

Question 123

Should permitted development rights for air source heat pumps be removed in ASSIs and Sites of Archaeological Interest?

Yes No

Question 124

Should permitted development rights for air source heat pumps within the curtilage of a Listed Building be removed only where Listed Building Consent for the development has not previously been granted?

Yes No

DOMESTIC MICROGENERATION

Question 1

Should restriction on permitted development rights for roof mounted solar panels on a dwellinghouse in ASSIs be removed on the basis that such development would not prejudice the reason for ASSI designation?

Yes No

Question 2

Should restriction on permitted development rights for wall mounted solar panels on a dwellinghouse in ASSIs be removed on the basis that such development would not prejudice the reason for ASSI designation?

Yes No

Question 3

Should permitted development rights for free standing solar panels within the curtilage of a dwellinghouse in ASSIs and Sites of Archaeological Interest be removed?

Yes No

Question 4

Should permitted development rights for biomass fuel containers within the curtilage of a dwellinghouse in ASSIs and Sites of Archaeological Interest be removed?

Yes No

Question 5

Should permitted development rights for building mounted wind turbines on dwellinghouses in ASSIs be removed as a precautionary measure to protect bats and birds?

Yes No

Please refer to Q49

Question 6

Should permitted development rights for free standing wind turbines within the curtilage of a dwellinghouse in ASSIs and Sites of Archaeological Interest be removed?

Yes No

Please refer to Q69

Question 7

Should restrictions on permitted development rights for flues within the curtilage of a dwellinghouse in ASSIs be removed on the basis that such development would not prejudice the reason for ASSI designation?

Yes No

Question 8

Should permitted development rights for ground source heat pumps within the curtilage of a dwellinghouse in ASSIs and Sites of Archaeological Interest be removed?

Yes No

Question 9

Should permitted development rights for water source heat pumps within the curtilage of a dwellinghouse in ASSIs and Sites of Archaeological Interest be removed?

Yes No

Question 10

Should permitted development rights for air source heat pumps within the curtilage of a dwellinghouse in ASSIs and Sites of Archaeological Interest be removed?

Yes No