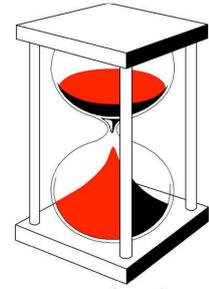




**Friends of  
the Earth  
Scotland**

## **Consultation on Permitted Development Rights for Domestic Microgeneration Equipment**

**A response from Friends of the Earth  
Scotland and the Association for the  
Conservation of Energy**



**Association  
for the  
Conservation  
of Energy**

14 May 2008

### **Introduction**

The Association for the Conservation of Energy (ACE) is a lobbying, campaigning and policy research organisation, and has worked in the field of energy efficiency since 1981. Our lobbying and campaigning work represents the interests of our membership: major manufacturers and distributors of energy saving equipment in the United Kingdom. Our policy research is funded independently, and is focused on four key themes: policies and programmes to encourage increased energy efficiency; the environmental benefits of increased energy efficiency; the social impacts of energy use and of investment in energy efficiency measures; and organisational roles in the process of implementing energy efficiency policy.

Friends of the Earth Scotland (FoES) is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

This response is on behalf of both organisations. Our two organisations have been working together on the issues of energy conservation and promotion of microgeneration for more than eight years, during which time we have worked in close cooperation with the Scottish Government and previous Executives to reduce emissions from the built environment and to tackle fuel poverty. On the specific issue of granting permitted development rights to microgeneration, we were one of the stakeholders consulted by Heriot Watt University School of the Built Environment in their research commissioned by the previous Scottish Executive in late 2006. We have also been in regular dialogue with officials and Ministers on this subject over a number of years.

This consultation response has been compiled following input from our members and supporters and in consultation with contacts in the wider microgeneration industry. We welcome the opportunity to comment on the Scottish Government's proposals.

### **Summary**

ACE and FoES welcome the Scottish Government's intention to remove the requirement for planning permission for many microgeneration installations. If done well, this could lead to a marked increase in the take-up of microgeneration, which will make a significant contribution to the Scottish Government's target of an 80% reduction in greenhouse gas emissions by 2050.

However, we believe the proposals outlined in the consultation paper are nowhere near permissive enough to fulfil the potential for emissions reduction that microgeneration could deliver. We believe the proposals show a distinct lack of ambition for Scotland, and are

**Friends of the Earth Scotland & Association for the Conservation of Energy**

5 Rose Street, Edinburgh EH2 2PR

Tel 0131 243 2701 Fax 0131 2725

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frankly at odds with the SNP Government's stated aim of an 80% reduction in emissions by 2050.

A change in approach is needed in our view, from the over-riding attempt in the consultation document to control microgeneration developments, to one of encouraging and supporting microgeneration developments where appropriate.

The specific improvements we would like to see in the Scottish Government's approach to permitted development rights for microgeneration are:

- A change in approach from development control to development management.
- Public acknowledgement that the visual impact of microgeneration can be a positive one, representing as it does a move to a low-carbon economy.
- A number of technologies, in addition to those proposed, should be granted PD status in certain circumstances. Specifically, these are community-scale CHP, vertical-axis wind turbines and micro-hydro.
- The Government should bring forward proposals for PD rights for non-domestic microgeneration installations without delay.
- The parameters for solar panels should be extended to 200mm above the roof plane and 200mm above the roofline. The 60% threshold is arbitrary and should be dropped.
- Solar panels on the walls of tenements should be given PD status.
- The 100m threshold for wind turbines and air source heat pumps is unacceptable, would lead to the effective exclusion of wind turbines in most built-up areas and should be replaced by a noise-based approach.
- An updated planning advice note is needed to ensure that planners are encouraged to grant permission for microgeneration applications which fall outwith the parameters of the GPDO unless there are strong reasons not to do so. The GPDO should not be regarded as a measure of whether or not an application should be rejected.

### **General comments**

Before we answer each of the consultation questions in turn, we would like to make some general comments about the consultation and the approach taken by the Scottish Government.

#### **a) Approach to permitted development**

We are disappointed that the general approach taken to microgeneration installations in the consultation document appears to be one of 'development control' rather than 'development management'. We would hope for an approach that was more in tune with the latter. That is to say, that rather than seeking to control and restrict microgeneration development so far as possible, we feel microgeneration developments should be encouraged and promoted to ensure that carbon reduction and support for the micropower industry is maximised while other impacts (visual, amenity etc) are kept within reasonable limits. While the latter may have been the aim in drawing up this consultation, we do not feel that it has been achieved.

We believe that the most sensitive locations and buildings are afforded sufficient protection via procedures such as historic building and conservation area consents. Permitted development rights can, where necessary, be varied to require planning consent for specific

micro-generation technologies, if specific impacts on character are a concern. Outside these areas, we believe the general approach is far too restrictive and disproportionate. Taken to its logical conclusion this approach would see existing permitted development rights removed, where their visual impact is comparable with that of micro-generation technology. This approach discriminates against micro-generation technologies simply because they are novel, a factor that would soon diminish over time as technologies become established. This is a disappointing change of policy given that Scottish Planning Policy 6: Renewable Energy states “The Executive is also positively considering extending permitted development rights” and goes on to urge local authorities to “encourage and support micro-generation proposals on existing buildings that satisfactorily address broad criteria, including appropriate environmental and amenity safeguards and the requirements of building regulations.” On balance the consultation fails to maintain this positive approach and instead takes a much more reluctant and in many cases needlessly cautious approach.

#### **b) Scottish Government targets on greenhouse gas emissions**

We do not believe that the approach taken in the consultation paper is consistent with existing Scottish Government policy and future policy commitments on reducing greenhouse gas emissions. Specifically, the Scottish Government’s consultation on a Scottish Climate Change Bill, launched on 29 January 2008, set out proposals to reduce Scottish emissions by 80% by 2050, equivalent to a 3% reduction per annum<sup>i</sup>. Research by the Energy Saving Trust has concluded that micropower technologies could supply 30-40% of UK electricity demand by 2050 if given the right support<sup>ii</sup>. In contrast, research by Dr Brenda Boardman of Oxford University has suggested that ‘business as usual’ will deliver only an 11 to 18 percent reduction in emissions from the domestic sector by 2020<sup>iii</sup>. We feel the proposals outlined in the consultation paper are far too close to ‘business as usual’ and will therefore not contribute sufficiently to the Scottish Government’s emissions reduction target. A far more permissive approach is needed, in our view.

We are also aware of legal obligations on both Scottish Ministers and planning authorities to exercise their functions with the objective of contributing to sustainable development. Whilst this does not apply specifically to the GDPO the spirit of the legislation most certainly does. It is therefore disappointing that the consultation appears to hinder the roll out of sustainable technologies. It is also inconsistent with Scottish Planning Policy 6: Renewable energy, which states “A key role of the planning system will be to support a move towards new and low carbon developments through the use of energy efficient micro-generation ... systems.”<sup>iv</sup>

#### **c) Visual impact versus effective siting of technology**

Throughout the consultation document, the overriding issue of concern appears to be not whether siting of a technology will lead to its most effective generation of heat or power, but whether the visual amenity has been affected and ensuring impacts are minimal. This is in our view a fundamentally flawed approach for two reasons.

Firstly, it is in our view a positive approach if more microgeneration installations are visible on our streets and houses. Given the urgent need to reduce emissions in order to play our part in combating climate change, a very visible sign that citizens are increasingly playing their part in cutting carbon can only be a positive thing. Contrast the message that a solar panel or wind turbine attached to a building sends to the observer with that sent by a satellite dish: the former is sending a positive message that climate change can be tackled, while the latter is sending a message that an increasingly sedentary lifestyle, with attendant increases in health and societal problems, is acceptable.

Secondly, in many cases, the aim to reduce visual impact contradicts the aim to site the technology in such a way that it maximises useful output. For example, limiting the height of stand-alone turbines to 11.1 metres to turbine tip would effectively encourage the installation

of turbines in sub-optimum locations: a stand-alone turbine tower should be sited to ensure that disruption of wind flow is minimised, which would usually mean a taller tower. The same is true of proposals for solar panels in conservation areas: if the roof facing the highway were also south facing, the PD proposals as written would encourage sub-optimal siting. Lower performance means not only reduced contribution to reducing carbon emissions, but also a longer payback time, which will discourage investment in these technologies.

#### **d) Technologies excluded from the consultation**

We are concerned that a number of microgeneration technologies are either not covered or specifically excluded from the consultation. Questions 23 and 24 deal with micro-hydro and our response below explains why we agree with the Heriot-Watt research that this technology should be granted PD status within the limits proposed.

Other technologies which appear to have been ignored are vertical axis wind turbines and community-scale CHP. Both of these technologies have a role to play in reducing emissions from the built environment – the latter a very significant role to play – and we feel that an opportunity would be missed if these technologies were not also granted PD status within reasonable parameters. We have suggested parameters for both vertical-axis wind turbines and community-scale CHP below.

#### **e) Non-domestic permitted developments**

As the consultation document makes clear, the proposals outlined would apply only to domestic developments. We see no reason why PD should not also be extended to business premises, and look forward to a consultation on extending PD rights to microgeneration in the non-domestic sector without delay.

Allowing any significant delay before a consultation on PD rights in the non-domestic sector would be an inherently inconsistent approach given the scope of permitted development rights already afforded to industrial and warehouse buildings, and agricultural buildings. Given the lower amenity in industrial sites compared to residential settings, such an approach runs counter to the thrust of the current consultation. Extending PD rights in the non-domestic sector would also be in line with the enterprise policies being pursued by the Scottish Government, in that it would remove red tape and costs on businesses.

#### **f) Research commissioned by the previous Executive**

The consultation paper mentions research into the GPDO which was commissioned from Heriot Watt University School of the Built Environment and others. While we do not agree with their findings in every regard, their approach clearly recognised the need, and the desire in existing and forthcoming Government legislation, to encourage the uptake of microgeneration in order to reduce greenhouse gas emissions. Such recognition is, in our view, almost entirely lacking in the consultation paper and must be incorporated into the final Order.

#### **g) An updated planning advice note**

An updated planning advice note is in our view needed to ensure that planners are encouraged to grant permission for microgeneration applications which fall outwith the parameters of the GPDO unless there are strong reasons not to do so. The GPDO should not be regarded as an indication of whether or not an application should be rejected. Because of the urgency of the problem of climate change, a significant increase in the number of microgeneration installations will be needed. There should be a presumption that those applications which fall outside the parameters of the GPDO should normally be approved unless there is a particularly good reason for not doing so. This updated planning advice note should be published to coincide with the new Order coming into force.

**Turning now to the specific questions posed in the consultation document:**

**1 – Are there sufficient grounds to further constrain the PD proposals for domestic microgeneration equipment, especially wind turbines, in areas designated for their landscape quality? Please provide justification or evidence for your answer.**

No, we do not believe there are grounds to further constrain the proposals set out in the consultation paper in areas designated for their landscape value. As noted in the consultation paper, the landscape impact of microgeneration is generally very low indeed and further constraining development would not in our view be helpful.

Indeed, as mentioned above, we believe that the proposals set out, are too restrictive and should be made more permissive in most cases if Scotland is to achieve an 80% reduction in CO<sub>2</sub> emissions from the domestic sector by 2050.

**2 – Are there sufficient grounds to further constrain the PD proposals for domestic microgeneration equipment in areas designated for the protection of flora and fauna? Please provide justification or evidence for your answer.**

No, we cannot see any justification for further constraining the PD proposals in areas designated for flora and fauna. We agree with paragraph 12 of the consultation document, that the microgeneration technologies which the PD proposals cover, as well as others which are not covered in the consultation paper, are generally very low impact technologies.

In addition, as set out in the consultation document, there are other pieces of legislation which will afford adequate protection to areas of notable natural heritage.

**3 – Should PD rights for microgeneration equipment, except wind turbines, be granted in areas designated for their built heritage value providing that the principle elevation fronting a highway is unaffected?**

We do not agree with the premise of the question. We would prefer that microgeneration equipment, including wind turbines, should be given PD rights in all areas, including in those designated for their built heritage value. This should apply whether or not the principle elevation fronting a highway is affected. In our view, as outlined above, visual amenity is in no way diminished and may in some cases be enhanced through the installation of microgeneration equipment and at any rate should not be the principle issue in deciding where it is appropriate to install microgeneration equipment. The principle issue in making such a decision should be ensuring the location chosen maximises the output of the equipment so far as reasonably practicable.

In those cases with an exceptionally high built heritage value, planning authorities are able to remove PD rights through 'Article 4 Directions', as explained in paragraph 12 of the consultation document. We would prefer this approach, for two reasons. Firstly, the presumption should always be in favour of granting permitted development, even in designated areas, unless there is good reason not to do so. Treating designated areas as a 'class exemption' from PD would run counter to this and would not in our view be appropriate. Secondly, where PD rights are withdrawn under Article 4 Direction, no planning fee is required, thus removing one of the barriers to the take up of microgeneration. This would again be preferable to granting a 'class exemption' from PD in designated areas, which would then require a planning fee.

**4 – Are the separate controls for listed buildings sufficient to control the installation of microgeneration equipment? If not, what specific provisions are necessary?**

Again, we do not agree with the premise of the question, which in our view seems to be worded in terms of controlling development. As mentioned above, we understood that the modern planning system in Scotland did not seek to *control* development, but rather sought to *manage* development. The distinction is crucial.

On the substantive question of whether additional control is required, on top of existing legislation which protects listed buildings, our response is in the negative. The existing legislation is adequate, in our view.

**5 – Will the setting of listed buildings be adequately protected by not granting PD rights to wind turbines and solar arrays within their curtilage?**

Again, we do not agree with the premise of the question. We do not believe that there is sufficient justification for not granting PD rights in the ‘setting’ of listed buildings. As mentioned in para 26 of the consultation document, listing buildings themselves are protected through existing legislation. In addition to the above, we do not see how the ‘setting’ of a listed building can reasonably be defined in statute.

**6 – Do you think that general conditions on amenity and other impacts could be applied to the PD rights for microgeneration equipment?**

No, we do not agree that general conditions on amenity and other impacts should be applied to PD rights for microgeneration. We believe that setting the parameters of the PD in such a way that, for example, wind turbines with a blade diameter exceeding 2.5 metres are not PD would serve to adequately protect from excessive amenity and other impacts.

As we have set out above, we do not believe that amenity or other impacts should be the primary factor in deciding whether or not to grant PD rights. We accept that they may be a factor, but they should by no means be a deciding factor.

**7 – Do you agree that the same PD rights should apply to solar water heating and photo-voltaic panels? If not, please say why.**

Yes, so long as those PD rights are sufficiently permissive to allow most current forms of both technology. Specifically, we believe the 150mm limit above the roof plane is too restrictive and should be amended to at least 200mm. See response to question 8 for more details.

**8 – Do you consider that the proposed PD limits for solar panels on domestic buildings of 150 mm above the plane of a pitched roof or a wall, not higher than the highest point of a pitched roof and covering up to 60% of the roof or wall area are appropriate? If not, what should the limits be and why?**

No, these limits are too restrictive. Solar thermal panels in particular can be greater than 150mm thick, so we would suggest at least 200mm above the plane and 200mm above the highest point of a pitched roof. We do not agree that there should be an artificial limit to the percentage of a roof area covered by solar panels or tiles. As mentioned above, the determining factor should be maximising the useful output of any equipment. As such, we do not believe that artificially imposed limits such as those proposed are appropriate.

Indeed, it may be the case that a solar array covering 100% of a roof area would have a lower visual impact than a 60% coverage, since the 100% coverage may not be immediately obvious to the casual observer, whereas the 60% coverage almost certainly would.

One justification given for including the 60% figure in the consultation document is that re-roofing a house in a way which materially affects its appearance would require planning permission at present. However, in the debate which accompanied the passage of the Planning etc (Scotland) Act 2006 through Parliament, Ministers and officials often repeated their aim to ‘declutter’ the planning process and remove minor developments such as garden sheds from the requirement for planning permission. It would surprise us if re-roofing a house did not come into this category, thus suggesting that the requirement for planning permission for such a development will not stay in place for very much longer. Though of course, we are in no way seeking to prejudge future Scottish Government policy in this area. Likewise, we do not believe it is appropriate that 100% coverage of solar panels or solar tiles requires planning permission.

**9 – Do you agree that there should be no PD for solar panels on the walls of buildings containing flats?**

No.

The walls of buildings containing flats should also have PD status, since in some cases they are the most suitable locations for solar panels. Excluding the walls of tenements from PD would in our view be a grave mistake. In some areas of Scotland, more than two fifths of the housing stock is tenemental, and a great deal of that is solid wall. This effectively excludes the two most common and cost-effective energy efficiency measures: loft insulation and cavity wall insulation. To also exclude this section of the housing stock from PD would send a strong signal that microgeneration is not to be encouraged in this stock. This would make an 80% cut in emissions from the domestic sector extremely difficult to achieve, and would also make achieving the 2016 fuel poverty target significantly more challenging. On the contrary, we believe microgeneration, in particular solar and community-scale CHP, should be encouraged in this stock type, and therefore PD should also be granted on the walls of buildings containing flats.

**10 – For flat roofs do you agree or do you have alternatives to the suggestion that PD rights for panels should be set so that they are no closer than 1 metre to the edge of the roof, with the highest point of the panel not more than 1 metre above the plane of the roof and covering up to 60% of its area? If not, please suggest alternative provisions.**

No, we again believe that these proposals are too restrictive. Both the 1 metre restriction to the roof edge and the 60% restriction are too restrictive, and should be removed.

As mentioned above, we believe the visual impact of microgeneration equipment in general and solar panels more specifically, is a positive one. PD rights should be extended to solar panels on flat roofs, so long as they do not extend more than 1 metre in height above the plane of the roof.

**11 – For free-standing arrays, should PD rights be set at less than 4 metres in height, at least 5 metres from the property boundary and with a maximum area of 9 sq metres?**

We agree with the 4 metre height threshold, but not the property boundary threshold or the maximum area threshold, which appear to us to be entirely arbitrary. Both should, in our view, be removed.

**12 – Do you agree with the principle of applying a distance criteria for wind turbines to deal with the potentially adverse impacts?**

No, we do not agree with applying a distance criteria for wind turbines, which would set an artificial limit on the number of wind turbines in an area, and will effectively exclude wind turbines from many built-up areas.

Rather, we would prefer a system which uses technology certification on the basis of noise to set PD criteria. Specifically, we would suggest that the Microgeneration Certification Scheme currently being developed by the Department for Business, Enterprise and Regulatory Reform is used. We understand the Scottish Renewables and the Micropower Council have provided further details of this scheme, and we would strongly endorse this approach.

We would also endorse the proposal from Scottish Renewables, whereby in rural dwellings more than 200m from the nearest dwelling, a larger turbine is permitted. This proposal would, we feel, provide a specifically Scottish solution to the problem of how to heat and light homes in more remote, off-gas-grid, parts of rural Scotland.

**13 – If you agree with question 11 do you think it should be set at 100metres to the nearest domestic building or can you suggest and give evidence for another figure?**

Not applicable – we do not believe that a distance criteria is appropriate.

**14 – Do you agree with the following limits on the scale of building mounted wind turbines? (each turbine blade up to 1.1 metres in length, up to 3 metres above the highest part of the roof and one per building)**

No, we do not agree that these limits are sufficiently permissive. We would suggest a maximum turbine diameter of 2.5m and a turbine hub up to 5 metres above the highest part of the roof.

The restriction of one turbine per building is not appropriate, is too restrictive, and should be dropped. If a building is in a windy area, the householder should be encouraged, not discouraged, from installing more than one turbine, even if they only do so to export the electricity generated: they are still contributing to emissions reductions.

Lastly, we believe the proposals as set out are focussed purely on horizontal axis turbines. While these are currently the most popular type of micro-wind turbine, we would suggest that vertical axis turbines should also receive PD rights under certain circumstances. We would suggest that the longest dimension of vertical axis turbines should not exceed 5 metres. Alternatively, an approach based on the swept area of the turbine, as advocated by Scottish Renewables, may be more pragmatic.

**15 – Do you agree with the following limits on the scale of free-standing turbines? (each blade up to 1.1 metres in length and a maximum height including tower of 11.1 metres to the tip of the turbine blade, located at least 12 m from the boundary of the property and one per curtilage.)**

No, the proposals are too restrictive in our view. For free-standing turbines a larger turbine diameter should be permitted: we would suggest up to 6m diameter. Likewise, the proposed 11.1m height to tip of blade is too restrictive: we would suggest a maximum 15 metre hub height. As mentioned above, the proposed restrictions would contradict the usual dictum for siting wind turbines, specifically that turbines should be sited well clear of surrounding obstructions which might disrupt windflow.

Alternatively, the PD could be expressed in terms of ‘swept area’, as suggested by Scottish Renewables, rather than hub height and maximum blade length, which would allow vertical-

axis turbines as well as horizontal-axis. Either way, the proposals set out in the consultation paper are in our view insufficiently permissive.

**16 – Should the visual impact of free-standing turbine masts be controlled by a condition on the PD rights such as ‘provided the colour of the mast minimises its visual impact’ or can you suggest an alternative formula?**

Such a condition would be entirely subjective and in no way appropriate.

**17 – Do you agree that flues for biomass stoves should be permitted development up to 1 metre above the highest point of the roof but not on the principal elevation in conservation areas.**

We do not agree with the premise of the question. We see no reason why the principle elevation in conservation areas should have any bearing on PD rights, as mentioned above. We do however agree with the 1 metre threshold.

**18 – Do you agree that wood stores should be treated in the same way as any other residential alterations or ancillary development, so that depending on circumstances they may be PD.**

Yes, with the caveat set out in answer to question 17 above.

**19 – Do you agree with the proposal that ground and water source heat pumps, including the collectors and associated trenches or boreholes should be permitted development?**

Yes.

**20 – Do you agree that air source heat pumps should be permitted development with the proviso that they should not be located within 100 metres of a separate house or flat?**

No, we do not agree that air source heat pumps should be treated in this way. As we have mentioned above in relation to mini wind turbines, we believe the distance criteria is not appropriate and should be replaced with a noise criteria that is specific to each technology type, through the Microgeneration Certification Scheme. A 100m threshold is entirely arbitrary, and is so restrictive that it would exclude the vast majority of buildings in an urban setting, including all tenements and terraces. In this respect, we don't believe any distance based criteria would be workable.

21 – If you think the distance criteria should be different, please say what you suggest and give the evidence to justify it.

As above.

**22 – Do you agree that there are no PD issues for domestic combined heat and power devices except for flues, in which case the PD limit should be 1 metre above the highest point of the roof, and additionally in conservation areas or world heritage sites not on the principal elevation and visible from a road?**

Again, we disagree with the premise of the question. It may be true that there are no PD issues for domestic CHP except for flues.

However, we would suggest that community-scale CHP, which might be supplying heat and power to as few as two homes, should also be given PD rights in certain circumstances. The increased efficiencies and carbon savings that can be achieved by community scale-, as opposed to micro-, CHP are substantial. We would suggest the same parameters as for

biomass boilers, with the exception that fuel stores should also be PD, so long as they are installed below ground level and are less than 50 cubic metres in size.

**23 – Do you agree that there should be no additional PD rights for domestic scale hydro-electric generating schemes? If ‘no’ please see the next question:**

No.

**24 – If you have answered ‘no’ to the previous question please say in what circumstances and within what criteria you think that domestic scale hydro schemes should be permitted development?**

PD rights for micro-hydro should be granted as set out in the research commissioned by the previous Scottish Executive from Heriot Watt University and others: schemes on existing engineered channels up to 50kW should be PD.

The consultation document states, in relation to micro-hydro: “There are likely to be few opportunities for such schemes in domestic circumstances...” In reality, we do not know whether this is the case and I understand that the Scottish Government is currently commissioning research from SISTech, Black & Veatch and Nick Forrest Associates to determine the potential in Scotland for hydro power of all sizes. However, even if it were true that the potential for micro-hydro is small, this is not, in our view, sufficient grounds to exclude it from PD.

Micro-hydro is a very low-impact technology, especially where existing engineered channels are used. We therefore cannot see of any reason why it should not be granted PD in line with the Heriot Watt research findings.

**25 – Do you think that an overall limit should be set for the combined microgeneration capacity which is permitted development, and if so what should it be? Please justify your answer.**

No limit should be set. As explained above, it is not in our view appropriate to set artificial limits on permitted development: the main constraining factor should be the most efficient and effective use of the equipment. Likewise, it may be appropriate to install more than one technology – for example one heat-producing technology and one electricity-producing technology. So long as each technology fits within the parameters we have outlined above, there is no reason not to grant them PD.

**26 – Are the proposals for PD likely to have particular impacts on societal groups?**

As the proposals stand, they would negatively impact upon those living in built-up areas, and in particular those living in tenements, who would face greater barriers to the installation of microgeneration than those living in rural areas. We would strongly urge the Scottish Government to amend their proposals as outlined above in order to reduce this negative impact.

## **Conclusion**

While we welcome the Scottish Government’s ambition to remove the barriers to the installation of microgeneration, the proposals set out are not sufficient to do that. With the right proposals, Scotland could lead the way in reducing emissions from the built environment and boosting the microgeneration industry. We look forward to the proposals being amended to ensure they deliver.

We trust you are able to take these views into account.

For further information please contact

Chas Booth

Parliamentary Officer

Association for the Conservation of Energy & Friends of the Earth Scotland

chas (at) ukace.org

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<sup>i</sup> Scottish Government (2008) *Consultation On Proposals For A Scottish Climate Change Bill*

<sup>ii</sup> Energy Saving Trust (2005) *Potential for Microgeneration Study and Analysis*

available online:

[http://www.energysavingtrust.org.uk/uploads/documents/aboutest/Microgeneration%20in%20the%20UK%20-%20final%20report%20REVISED\\_executive%20summary1.pdf](http://www.energysavingtrust.org.uk/uploads/documents/aboutest/Microgeneration%20in%20the%20UK%20-%20final%20report%20REVISED_executive%20summary1.pdf)

<sup>iii</sup> Brenda Boardman (2007) *Home Truths: a low-carbon strategy to reduce UK housing emissions by 80% by 2050*

<sup>iv</sup> Scottish Government (2007) *Scottish Planning Policy 6 Renewable Energy*