



Friends of the Earth Scotland and WWF Scotland
Joint response to 'permitted development rights for domestic micro-wind turbines and air source heat pumps' consultation

Introduction

The current Scottish Government proposals for permitted development rights for domestic micro-wind turbines and air-source heat pumps will effectively exclude these technologies from being taken up in almost all urban areas and many rural areas. Given the requirement to implement this order falls within the Climate Change (Scotland) Act, the proposals represent a missed opportunity to back up Scotland's world-leading climate legislation.

Why the Scottish Government's proposals are flawed

The Government's own findings have found that air-source heat pumps have a particularly important role to play with regard to rural households off the gas grid. However, the proposals, as drafted, will continue to act as a financial and administrative burden for these households, of which many are fuel poor.

The proposals also send the wrong signal that these technologies are noisy and unsuited to urban installations. At a time when investment in green industry is needed more than ever, the Government should be seeking to cut red-tape for home renewables rather than maintaining it.

For both urban and rural areas the arbitrary 100 metre limit will limit ambitions to tackle fuel poverty and reducing emissions from homes at a time when every effort needs to be made to make Scotland's homes low carbon.

What alternatives should be proposed

As we have previously stated in response to past consultations, we believe it would be more appropriate to take noise performance into account.

Conclusion

Given the requirement to bring forward permitted development proposals is set out in the Climate Change (Scotland) Act, these proposals, as drafted, will set Scotland on the wrong footing to meet the ambitious targets in that act.

We are pleased that the Government is re-thinking the proposals and will consult on another draft. We will respond to this consultation fully and hope the final proposals will maximise the benefits micro-wind turbines and air source heat pump can have for householders, the renewables industry and the environment.

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