Stop Climate Chaos Scotland

Response to Consultation on Permitted Development Rights: Non-Domestic Solar Panels and Domestic Air Source Heat Pumps

August 2015

Background

Stop Climate Chaos Scotland (SCCS) is a diverse coalition of organisations in Scotland campaigning together on climate change. Our members include environment, faith and international development organisations, trade and student unions and community groups. SCCS works to ensure Scotland plays its fair part in tackling climate change and that the commitments set out in the Scottish Climate Change Act are achieved, including targets to reduce emissions by 42% by 2020 and 80% by 2050.

Consultation response

1 - Do you agree with the proposal for non-domestic solar panels?
Yes

2 - Please provide other comments on the proposal for non-domestic solar panels
Solar energy is increasingly recognised as a sector which could deliver substantial renewable energy in Scotland and consequent emissions reductions. Rooftop solar and other micro-scale renewables can also help energy consumers make connections between the energy they use and its source, encouraging behavioural change.

The solar resource in Scotland is not dissimilar to Germany – the largest photovoltaic (PV) market in the world. It has been estimated that an installed capacity of around 7GW of rooftop solar is technically feasible, which is roughly equivalent to the entire current installed renewable electricity capacity[1]. Whilst growth of solar in Scotland has been promising, there is a clear need to support continued and more rapid growth. We therefore support the removal of planning barriers where appropriate to enable increased uptake of rooftop solar in the non-domestic sector.

The proposal is compatible with other areas of Scottish Government policy including: the target for the equivalent of 100% of electricity demand to be generated from renewable sources by 2020; Scottish Planning Policy to support a diverse range of electricity generation; and the Low Carbon Building Standards Strategy.

3 - Do you agree with the proposal for domestic air source heat pumps?
Yes

[1] See http://siser.eps.hw.ac.uk/index.php/solar-in-scotland

4 - Please provide other comments on the proposal for domestic air source heat pumps

Heating accounts for around 50% of Scotland's carbon emissions and over half its energy demand, so alongside efforts to reduce heat demand, scaling up renewable heat sources will be critical to meeting future Climate Change Act (Scotland) commitments. The Scottish Government has a target for 11% of heat demand to be met from renewable sources by 2020 and to make 'significant progress' towards decarbonising heat by 2030. However, this target is off track, with only around 3% of heat demand currently coming from renewable sources. Forthcoming research for WWF Scotland, RSPB Scotland and Friends of the Earth Scotland by Ricardo AEA, shows that Scotland will need to meet around 40% of our heat demand from renewables by 2030 to hit future Climate Change Act (Scotland) targets.

Air and ground source heat pumps are likely to be the dominant technology in the decarbonisation of heat in Scotland[2] and a major expansion will be needed over the coming decades. Air source heat pumps are a practical technology to meet increasing demand for space heating in the residential sector, as they are easy to install and suitable for higher density housing, retrofit and new builds. According to Scottish Enterprise, a heat pump with a Coefficient of Performance of 3 could reduce carbon emissions by up to 17% against gas and 44% against oil.[3]

We strongly agree therefore that permitted development (PD) rights should be amended as proposed to bring them in line with those in England and Wales. Requiring a planning application increases time, complexity, cost and 'hassle factor' for consumers, particularly when they may need to replace a conventional gas boiler at short notice. Provided amended proposals adhere to strict guidelines under the Microgeneration Certification Scheme (MCS), such as noise limits, these, in combination with the other exclusions regarding heritage impacts, should be considered adequate safeguards in combination with more expansive PD rights.

The proposals are in line with wider Scottish Government policies on renewable heat and Planning Policy to encourage microgeneration and heat recovery technologies. Whilst we agree with this action, this is only one step to supporting heat decarbonisation. While some incentives exist to install heat pumps, including the Renewable Heat Incentive (RHI) and Scottish Government Renewables Loan Scheme, installations remain low in number and there are a number of barriers to address:

- The high capital cost (£7-14,000) which is not addressed by the RHI;
- Well-insulated homes are necessary to ensure good heat pump performance and the energy performance of many Scottish homes is currently inadequate;
- Installers and consumers lack confidence in and familiarity with the technologies; and
- Information on heat pump performance is still emerging and evolving.

---

[2] Element Energy report for WWF: The Burning Question – What is Scotland's Renewable Heat Future: http://assets.wwf.org.uk/downloads/the_burning_question___wwf_scotland_feb_14.pdf

[3] http://www.scottish-enterprise.com/~/media/se_2013/knowledge%20hub/publication/heat%20recovery%20opportunities.pdf

By 2016, we would like the Scottish Government to adopt a comprehensive strategy to scale up renewable heat through a combination of regulation, financial incentives to overcome capital costs, and awareness raising.

5 – Please provide comments on the potential cost or other business impacts on small businesses as a result of extending the permitted development rights.
Supporting increased uptake of renewable heat technologies could have significant business benefits. Scottish Renewables have indicated that the renewable heat industry in Scotland could generate up to £2.7bn annually by 2020. Heat pump roll out presents a particular supply chain opportunity for Scotland, as a number of companies already have a competitive edge e.g. Star Refrigeration. Mirroring planning requirements in England and Wales more closely should also have business benefits by decreasing any confusion caused by differing planning regimes.

The change in relation to solar energy should encourage uptake of solar panels by business, in turn making it easier for Scottish businesses to save money on energy bills.

6 – Please provide general comments on the Business and Regulatory Impact Assessment.
No comment

7 – Please provide comments on the potential impacts of the technology on those people, in particular disabled older people, disabled children and young people, and other people who may be likely to spend long periods of time at home including older people, children and young people, women and minority ethnic communities.
Heat pumps can help to lower fuel bills, especially when replacing conventional electric heating, helping to tackle fuel poverty, which is currently rising and stands at 940,000 homes in Scotland. Reduced fuel poverty would have knock on benefits for public health and NHS budgets. Switching to heat pumps would also insulate homes against volatile fossil fuel prices and improve energy security, as North Sea gas reserves dwindle.

8 – Please provide information that would assist in providing data to help inform further Equalities Impact Assessment or Child Rights and Wellbeing Impact Assessment.
No comment.