

Shropshire Hills AONB Partnership

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Microgeneration Consultation Response
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Your Ref:
Our Ref: ph_120607_DCLG microgen
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Dear Sir/ Madam

Changes to Permitted Development: Consultation Paper 1 - Permitted Development Rights for Householder Microgeneration

The Shropshire Hills AONB has a remit principally to conserve and enhance natural beauty, but also to promote sustainable forms of social and economic development. The Partnership recognises that climate change is the biggest long term threat to the AONB and has agreed to concern itself with CO2 reduction measures to mitigate climate change as well as considering how the landscape, wildlife, etc. will adapt. The Partnership accords a high priority to providing solutions and means of reducing CO2 emissions in ways that are compatible with landscape conservation. From this background **the Partnership strongly supports the general proposals by the government to ease planning restrictions on householder microgeneration.**

Energy conservation is the best way to achieve reductions in CO2 emissions without harm to the landscape and should be given the highest priority. Reductions can be made by both behavioural change and technological or infrastructure improvements. Measures to ease planning restrictions on microgeneration therefore need to be accompanied by good advice and information. Some of the technologies may not be particularly effective at a very small scale, e.g. wind turbines, and may be undertaken as something of a fad. **Householders should be strongly encouraged to look at opportunities for microgeneration as part of a structured and targeted approach to reducing their CO2 emissions, which should also include energy efficiency and energy conservation.**

Our own draft policy, considered by the AONB Partnership in February 2007 (though not yet formally approved) is generally in line with the government's proposals. *"Small scale domestic renewable installations are encouraged, and AONB designation should not in itself prevent these (e.g. solar panels, roof mounted wind turbines). Adaptations to design and greater sensitivity may be required in Conservation Areas and on Listed Buildings, but even in these circumstances, effort should be made to enable energy benefits to be achieved."* *"Single wind turbines of up to 10m are acceptable in the vicinity of undesignated buildings, but location in more open country and near Listed Buildings and in Conservation Areas needs careful consideration. Large turbines and significant groups of turbines will generally be inappropriate".*

It is clearly the government's wish that the new regulations are not made over complex, and we support this. There are however **two aspects relating to free-standing wind turbines where a slightly tighter approach to permitted development in AONBs could be argued.** These are:

Numbers of small turbines. The proposed permitted development criteria would not appear to control multiple turbines below the size threshold. A distance criterion requiring a planning application for any turbine within a certain distance of any other turbines could apply (the Partnership were not confident to make a firm suggestion on what distance might be applicable, but around 200m was discussed).

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Location of small turbines in more open country. The consultation's consideration of visual impact focuses on the 'streetscene', and does not take adequate account of the rural landscape of AONBs. Excluding from permitted development rights any turbines located further than a certain distance than from a building could address this (the Partnership were not confident to make a firm suggestion on what distance might be applicable, but around 50m was discussed).

There may be other ways in which the regulations might take account of these issues, and we urge that they be considered.

The essence of this response has been endorsed by the Management Board of the Shropshire Hills AONB Partnership. Drafts of our response have also been considered in the responses of Shropshire County Council and the National Association for AONBs.

Yours sincerely

Phil Holden
AONB Manager