



*environmental protection, improvement, innovation*

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Sent by email to: [microgenresponses@communities.gov.uk](mailto:microgenresponses@communities.gov.uk)

26<sup>th</sup> June 2007

Dear Sir/Madam

While NSCA is supportive of the use of new technologies which provide local sources of energy and reduce impacts on the global environment, we are concerned that potential impacts on the local environment have not been fully considered in the drafting of this consultation.

There is a strong feeling among noise experts in particular that the consideration of allowing permitted development for householder microgeneration is premature. There is a lack of available information about the impact of small wind turbines - both from manufacturers and from the very limited experience to date of use in a domestic setting. There is also some concern about biomass burners, particularly as Scottish experience has found impacts on local air quality - especially from particulates.

To ensure that these technologies remain credible as viable solutions to emissions reduction, and to ensure that poor design and installation do not jeopardise the future of microgenerataion, we advocate the development of an Accreditation scheme for supply and installation, and, in light of limited experience of potential impacts and emissions, for caveats to be appended to any development rights permitted, as per those suggested in our answers to the questions, attached below.

Yours sincerely

Mary Stevens

# SUMMARY OF QUESTIONS

**THIS RESPONSE CAN BE SUBMITTED BY E-MAIL TO:**  
**microgenresponses@communities.gov.uk**

**Name of Respondent:** MARY STEVENS

**Organisation/Body (if applicable):** National Society for Clean Air and Environmental Protection

QUESTION	YES	NO	COMMENTS
<b><i>Question 1 – Do you agree with the principle of an impact approach for permitted development?</i></b>	Y		<p>Currently, as the technology is relatively new there is not enough knowledge on potential impacts for an impact approach to be applied. There is a real risk that allowing installation of microgenerators and heat pumps now could lead to nuisance impacts, creating a burden for enforcement agencies and undermining the credibility of the technology.</p> <p>To inform the development of a soundly based an impact approach for permitted development we would recommend the following:</p> <ul style="list-style-type: none"> <li>• Pilot studies to assess impacts in a variety of situations (could be carried out where turbines have been installed)</li> <li>• Development of a toolkit to enable an assessment be made of a turbine model's suitability for the site under the proposed rules.</li> <li>• A phased approach, allowing experience to inform future permissions – for example allowing detached homes first.</li> </ul> <p>Further, electrical connection requires Building Regulation approval, so this could be linked to the planning consent</p>
<b><i>Question 2 - Do you agree with a restriction on</i></b>	Y		

<p><b><i>development facing onto and visible from a highway in conservation areas and in World Heritage Sites?</i></b></p>			
<p><b><i>Question 3 - Should the restriction apply in the same way to the other types of designated area?</i></b></p>	Y		
<p><b><i>Question 4 - Do you agree that the impact of noise should be dealt with by specific noise restrictions based on decibel levels at/in neighbouring dwellings in the way proposed in Annex 2?</i></b></p>		N	<ul style="list-style-type: none"> <li>• There is currently insufficient information on the noise and vibration outputs of domestic wind turbines on which to base judgement as to appropriate levels.</li> <li>• We would like to see kitchens included in the definition of habitable room, as for many this is a primary living space.</li> <li>• Where the property to which a turbine is to be attached adjoins another, there is a concern that vibration transmission into the adjoining property may, as well as direct vibration impacts, cause re-radiated noise in the adjoining property. There is no simple way to determine this in advance. It depends partly on the turbine mounting and structural characteristics of both properties, so may not come to light until the turbine is in use. If planning permission were still to be required, a standard condition could be imposed placing the onus on the owner to ensure that re-radiated noise does not cause problems and to rectify the problem if it does arise.</li> </ul>