

SUMMARY OF QUESTIONS

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

Name of Respondent: Alison Rasey

Organisation/Body (if applicable): The Bat Conservation Trust

QUESTION	YES	NO	COMMENTS
<i>Question 1 – Do you agree with the principle of an impact approach for permitted development?</i>	Yes		But only if ALL impacts are assessed, including impacts on protected species.
<i>Question 2 - Do you agree with a restriction on development facing onto and visible from a highway in conservation areas and in World Heritage Sites?</i>	-	-	-
<i>Question 3 - Should the restriction apply in the same way to the other types of designated area?</i>	-	-	-
<i>Question 4 - Do you agree that the impact</i>	-	-	-

<i>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>			
<i>Question 5 - If not, what alternative approach would best address this issue?</i>	-	-	-
<i>Question 6 - Do you support a general restriction on permitted development (as proposed at paragraph 50 above) so as to require that visual impact is minimised in exercising the rights?</i>	-	-	-
<i>Question 7 - Do you agree that local planning authorities should be able to restrict permitted development rights for microgeneration where the benefit from the technology is outweighed by its impact?</i>	Yes		And the impacts must also include impacts on protected species and biodiversity outside designated sites.
<i>Question 8 - Do you agree that the existing protection is adequate?</i>		No	Although there is mention of protected species in para 55, there is no mention of how protected species that are not restricted to European, nationally or locally designated sites are to be safeguarded. BCT wonders how protected species such as bats (which roost and fly outside designated sites) can be safeguarded using provisions under A4 of the GPDO. Concerns about this are raised in our letter.
<i>Question 9 - Is guidance sufficient to address the potential impact on</i>	-	-	-

archaeologically sensitive areas?			
Question 10 - In addition to providing advice as to the scope of the changes to the GPDO, what could guidance also usefully cover?			It is essential that any guidance states that micro-turbines must not be erected in the vicinity of bat roosts or on bat flight lines particularly in, adjacent to, or between hedgerows or lines of trees. If roosts exist nearby then a bat expert must be engaged to ascertain whether the micro-turbine could have an adverse impact on bats.
Question 11 - Do you agree with the recommendations for solar microgeneration?		No	BCT has concerns about solar panels being placed over bat roost entrances, which may not have been noticed by the householder, thereby illegally obstructing the roost access. This can occur whether they are placed on roofs or walls.
Question 12 - Do you agree that there should be no restriction in terms of the coverage of roofs and walls by solar panels? If not, what would be an acceptable percentage?	-	-	-
Question 13 - Generally, should the same level of permissiveness apply to solar panels on a wall as on a roof?	-	-	-
Question 14 - Do you agree with a minimum separation distance of 5m to the boundary of a highway or neighbouring property for a stand-alone solar unit?	-	-	-
Question 15 - Do you agree with the	-	-	-

<i>recommendations for heat pumps?</i>			
<i>Question 16 - Do you agree that the likely impact of noise from ASHPs should be dealt with by specific noise restrictions in the same way as proposed for domestic wind turbines?</i>	-	-	-
<i>Question 17 - Do you agree with the recommendations for wind turbines?</i>		No	BCT is concerned that the proposal, if implemented, could lead people to be in breach of wildlife legislation, and may mean that the government is not complying with the biodiversity duties.
<i>Question 18 - Do you agree that the likely impact of noise from turbines should be dealt with by specific noise restrictions in the way proposed?</i>	-	-	-
<i>Question 19 - Do you agree with the recommendations for biomass?</i>	-	-	-
<i>Question 20 - Do you agree with the recommendations for CHP?</i>	-	-	-
<i>Question 21 - Do you agree there should be no additional permitted development rights for hydro?</i>	-	-	-