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Consultation on permitted development rights for small scale renewable and low carbon energy technologies, and electric vehicle charging infrastructure

Consumer Focus campaigns for a fair deal on behalf of consumers. We do this through research, policy, analysis, lobbying and by working with policy makers, providers and others who can make a difference to consumers' lives. We have a special remit to represent the interests of disadvantaged and vulnerable consumers.

This letter sets out Consumer Focus' response to the 'Consultation on permitted development rights for small scale renewable and low carbon energy technologies, and electric vehicle charging infrastructure'¹ issued by CLG on 9 November 2009.

We welcome the proposals that lower the barriers to take-up of renewable and low carbon energy generation, and electric vehicles, with the following reservations.

Q1 and Q3. Wind turbines

Mounted wind turbines:

Facilitating the erection of roof-mounted turbines undermines consumer education and advice about roof-mounted turbines, and is counter to the findings of the field trials by the Energy Saving Trust. These trials found that no urban or suburban sites with a building mounted turbine generated more than 200 kWh (£26) of electricity per year, while a roof-mounted turbine in a rural area in Scotland achieved 1,000kWh (or £127). In addition to low returns, there is also a risk of structural damage. If roof-mounted turbines are to be given permitted development rights, we suggest that these rights are limited to low-density rural areas, and we will continue to work with the industry assurance scheme to ensure that all micro-generators are given location-specific advice on the suitability of technologies.

¹ <http://www.communities.gov.uk/publications/planningandbuilding/microgenelectriccars>

Q 11. Electrical vehicle charging infrastructure

Consumer Focus welcomes clarification of the status of charging points and the development of standard guidance. We think that the approach to not permitting charging points within the curtilage of a listed building should be reviewed. Consumers living in listed buildings are already restricted from substantially improving the energy efficiency of their homes, and this approach seems overly restrictive. The impact of an electrical outlet in the curtilage of a building cannot reasonably be seen to harm the architectural interest of a building. Consumer Focus would prefer to see a restriction on the visual impact through a tougher limitation on the maximum volume of the installation rather than an absolute restriction on permitted development, which further restricts the ability of consumers in these buildings to move to a low carbon lifestyle.

Yours faithfully,

Liz Lainé
Senior Policy Advocate