

BY EMAIL: PlanningLDF@southglos.gov.uk

Strategic Planning Policy and Specialist Advice Team,  
South Gloucestershire Council,  
Environment and Community Services Department,  
PO Box 299,  
Civic Centre,  
Bristol  
BS15 0DR

3<sup>rd</sup> March 2014.

Dear Sir/Madam,

**South Gloucestershire Renewables Draft Supplementary Planning Document – consultation.**

The Cotswolds Conservation Board is the statutory body established in 2004 under the provisions of the Countryside and Rights of Way Act 2000 with the duty to pursue two purposes:

- To conserve and enhance the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB)
- To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board is required to seek to foster the economic and social well-being of people living in the AONB.

The Board welcomes the opportunity to comment on the draft SPD as follows:

- The Board would suggest that under 'National Context' reference should be made to paragraph 115 of the National Planning Policy Framework as well as that referring to Green Belt.
- The Board welcomes the references to the Cotswolds AONB Management Plan and the Board's Position Statements.
- Reference could be made to the Board's Landscape Strategy and Guidelines, as these provide guidance on the potential adverse impact of vertical structures.
- In section 8.4 'Hydropower' reference should be made to the possible need to obtain consents from the Environment Agency as well as planning consent.

- In section 8.7 under 'permitted development' the Board would wish to see mention of the possibility of the Council making an Article 4 direction removing permitted development rights for the installation of roof mounted solar collectors where roofs form a significant feature of a Conservation Area. I attach a copy of such a direction made by Harlow Borough Council. Concerns regarding possible compensation claims were avoided by that Council by giving householders one year's notice of intention to confirm the direction.
- In section 8.8 'Wind' the Board has considerable concern regarding the diagram on page 51. The smallest wind turbine is described as 'small' but still has an overall height of 34m. The next largest category is also described as 'small' with an overall height of 46m. It is stated 'For the purposes of this SPD, wind turbines have been divided into broad categories as illustrated in the diagram.' However, the only further reference to size in the SPD is in the fifth paragraph on page 52, where mention is made of 'very small scale' turbines (which are not shown on the diagram.) It is not clear what purpose the diagram serves as each site should be considered in its own context. A 'very small' turbine could still be considered inappropriate in a particularly sensitive location. The Board would therefore suggest
  - Deleting the diagram and references to it and
  - Deleting the fifth paragraph on page 52.
- The title of the Figure on page 15, or the figure itself is wrongly described as "solar applications".

Apart from the above comments, the Board considers the document to be most comprehensive and well researched.

I attach a copy of the Position Statement on renewable energy which has recently been revised.

If you wish to discuss or seek clarification on the comments above, please do not hesitate to contact me.

Yours faithfully

Malcolm Watt  
Planning Officer

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