

## Response ID ANON-ZKBU-BTDF-V

Submitted to Permitted development rights for onshore wind turbines in England  
Submitted on 2026-03-22 09:17:35

### About you

What is your name?

Name:  
Damon Hart-Davis

What is your email address?

Email:  
d@hd.org

What is the name of your organisation?

Organisation:

Which of the following most closely describes your organisation?

Please select one option.:  
Individual (not on behalf of an organisation)

If you would like to provide any further information, please do so here.:

Would you be happy for us to contact you for further information if required, or to update you on the outcome of the consultation? If yes, what is the best way to contact you?

Yes

Email address::  
d@hd.org

Phone number::

Other:

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:  
Other

Other (please specify):

buildhub.org.uk

### New PDR proposal: setting and size

1a Do you agree that a new PDR should be introduced for a wind turbine in non-domestic settings?

Yes

1b Please explain your answer.

Enter your text here.:

Removing barriers to microgeneration is overdue.

2a Do you agree that this PDR should be limited to a single turbine within the boundary of the curtilage?

No

2b Please explain your answer.

Enter your text here.:

I think that either conventional 1 HAWT (horizontal axis wind turbine) as you have proposed

OR

alternative more urban-adapted designs such as MotorWind limited to no more than ~50kWp in expected (~95 percentile) wind speeds in the area and limited by height and noise.

MotorWind: see the tiny system that I used to own and example of a bigger one at the bottom of the page:

<https://www.earth.org.uk/wind-power-pilot-autumn-2007-MotorWind.html>

3a Do you agree with a maximum 30 metre tip height for the non-domestic wind turbine?

Yes

3b Please explain your answer.

Enter your text here. :

3c Do you agree with a maximum rotor swept area of 200m<sup>2</sup>?

Yes

3d Please explain your answer.

Enter your text here.:

4a Do you think that a PDR should facilitate the installation of larger turbines on a site?

Not Answered

4b Please explain your answer, including any evidence, examples or case studies that inform your view.

Enter your text here.:

4c What types of impacts (positive or negative) might arise from allowing larger turbines to be installed under a PDR?

Enter your text here.:

4d Do you think that a PDR should facilitate the installation of multiple turbines on a site?

Yes

4e Please explain your answer, including any evidence, examples or case studies that inform your view.

Enter your text here.:

Different turbine designs such as MotorWind may be much more suitable to urban areas and airflow than a conventional single rotor HAWT.

4f What types of impacts (positive or negative) might arise from allowing multiple turbines to be installed under a PDR?

Enter your text here.:

Better use of flows over walls and parapets, less risk of ice-shedding, less risk of flicker effects.

4g If you answered 'yes' to Q4a or Q4d, are there specific criteria the policy could introduce to help determine when more than one turbine or larger turbines may be appropriate?

Enter your text here.:

4h If you answered 'yes' to Q4a or Q4d, what criteria, safeguards, additional requirements or approaches should apply to ensure that the impacts of allowing more than one turbine or larger turbines could be effectively managed?

Enter your text here.:

Limit total power and swept area.

New PDR proposal: siting restrictions

5a Do you agree with the proposed list of areas where the PDR will not apply?

5b What, if anything, would you change about the proposed list of excluded areas?

Enter your text here.:

I am concerned that this blocks too much on farmland, which is already not the 'natural' state of the land. Preserving everything in aspic doesn't work in a damaged climate.

6a Do you agree with the proposed additional condition to minimise visual impact on nearby heritage sites and important landscapes?

No

6b Please explain your answer.

Enter your text here.:

I am concerned that this blocks too much on farmland, which is already not the 'natural' state of the land. Preserving everything in aspic doesn't work in a damaged climate.

6c Do you think the proposed conditions are sufficient to prevent impacts from turbines installed on land nearby or adjacent to designated habitat sites?

Yes

6d Please explain your answer and provide any evidence you have.

Enter your text here.:

6e Do you think additional conditions are necessary to mitigate radar interference from nearby turbines?

No

6f Please explain your answer and provide any evidence you have.

Enter your text here.:

7a Do you agree with requiring a buffer distance of the tip height + 10% from the boundary of the curtilage?

Yes

7b Please explain your answer.

Enter your text here.:

7c Do you agree with requiring a buffer distance of ten times the rotor diameter from the curtilage of protected buildings?

Yes

7d Please explain your answer.

Enter your text here.:

Though I am concerned about dangers from ice-throw from blades within the curtilage.

8a Do you think this PDR should include a separation distance between turbines?

No

8b Please explain your answer. If you have said yes, please also provide views on what you consider to be an appropriate separation distance in metres.

Enter your text here.:

New PDR proposal: further conditions

9a Do you agree that non-domestic wind turbine installations should be certified to the relevant MCS standards?

Unsure

9b Please explain your answer.

Enter your text here.:

Providing that does not exclude new designs (eg such as a MotorWind or similar).

9c Do you agree that turbines meeting an equivalent standard should be allowed to be installed under this PDR?

Yes

9d Please explain your answer.

Enter your text here.:

We should permit unless unsafe, for people or wildlife. Recognising equivalent standards may help overcome blindspots, eg for new tech.

9e What schemes or standards, if any, would you consider as equivalent certification to MCS?

Enter your text here.:

10a Do you agree with the proposed condition on use of non-reflective materials on blades?

Yes

10b Please explain your answer.

Enter your text here.:

10c Do you agree with the proposed condition on removal of the turbine and associated infrastructure when no longer needed?

Yes

10d Please explain your answer.

Enter your text here.:

**New PDR proposal: prior approval**

11a Do you agree with including prior approval in respect of siting, impact of the development on the amenity of the area, and land contamination risks?

Unsure

11b Please explain your answer.

Enter your text here.:

**Other considerations**

12 Are there any other matters or likely impacts that should be considered if a new PDR is introduced for non-domestic wind turbines?

Enter your text here.:

**Environmental Impact Assessment (EIA)**

13 Do you have any comments on the relationship between EIAs and PDRs for small-scale, non-domestic wind turbine installations?

Enter your text here.:

Again, the more than one or two turbines may unreasonably exclude some novel designs such as MotorWind which may be in other respects far more amendable to particular sites. A suggestion to change this to (say) a kWp and/or swept area and/or expected annual generation limit per unit area of ground space, eg say  $<0.2\text{W/m}^2$  annual output cf a mean GB  $\sim 2\text{W/m}^2$  annual output for a fully-developed wind farm.

**Existing PDRs**

14a Do you think government should make changes to existing PDRs for small-scale turbines in domestic settings?

No

14b Please explain your answer. If you have said yes, please include changes you think government should make.

Enter your text here.:

Wind generation on urban home rooftops is generally a bad idea anyway.

## Repowering and community energy projects

15a Do you think government should introduce a new PDR for repowering projects?

Not Answered

15b Please explain your answer.

Enter your text here.:

15c Do you have views on how the planning system in England could be improved for repowering (or life extension) projects, beyond changes to the NPPF?

Enter your text here.:

16a Do you think government should introduce a new PDR for community energy projects?

Unsure

16b Please explain your answer.

Enter your text here.:

It may make sense to allow something for more smaller or novel design devices for community projects or when coordinated over multiple parcels of land, eg to in some ways treat the land area in aggregate for sizing purposes.

16c Do you have views on how the planning system in England could be improved for community energy projects, beyond changes to the NPPF?

Enter your text here.:

17 Do you have suggestions for any other circumstances where a PDR could be used for onshore wind installations?

Enter your text here.:

## General questions and evidence gathering

18 Do you have any further comments on the proposals in this consultation?

Enter your text here.:

19 Do you have any further evidence or data to share?

This could be in relation to: Predicted load factors for small-scale wind turbines; Forecasts on additional installations as a consequence of this policy; Potential wider impacts of this policy on the market, businesses, individuals, or the environment; Other barriers to installing small-scale wind turbines in non-domestic contexts.:

## Public Sector Equality Duty

20a Do you think that the changes proposed in this consultation could give rise to any impacts on people who share a protected characteristic (Age; Disability; Gender Reassignment; Marriage or Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

No

20b Please explain your answer.

Enter your text here.: