

The Planning Service Consultation on Microgeneration Permitted Development Rights
Response from the Energy Saving Trust
27th April 2007

This is the Energy Saving Trust's response to the Planning Service's consultation on permitted development rights for microgeneration, issued in January 2007. Please note that this response should not be taken as representing the views of individual Energy Saving Trust members.

The Energy Saving Trust was established as part of the Government's action plan in response to the 1992 Earth Summit in Rio de Janeiro, which addressed worldwide concerns on sustainable development issues. We are the UK's leading organisation working through partnerships towards the sustainable and efficient use of energy by households, communities and the road transport sector and one of the key delivery agents of the Government's climate change objectives. We have offices in each of the countries in the UK, and have had a dedicated office in Northern Ireland since 1996.

We operate a number of programmes in Northern Ireland (NI) including a Sustainable Energy Centre (SEC) providing advice on energy efficiency, transport and mass-market renewables to consumers. The SEC advised 13,500 consumers in NI about renewables in 2006/07. For further details about the SEC please see: http://www.energysavingtrust.org.uk/northern_ireland_advice_centre

Our expertise lies in sustainable energy and not in issues around visual amenity; as such our response is limited to the few questions we have the relevant expertise to answer. For this reason we have not filled out the standard consultation questionnaire.

Before commenting on the specifics of the consultation we make a number of more general comments.

General comments

We believe that it is important to ensure that:

- The right technology is installed in the right location and that this should be a requirement for permitted development (PD) rights to apply.
- Householders are signposted to impartial advice (such as that delivered by the NI SEC) on the best microgeneration technology for their property.
- Householders are encouraged to install cost effective energy efficiency measures, such as cavity wall and loft insulation in their homes before investing in microgeneration. It makes little sense to install generation capacity if much of the output is to be wasted through inefficient usage. The necessary capacity is also lower, and therefore costs less, if demand is low. In addition, many energy efficiency options are more cost effective than microgeneration technologies. As such it is important that options to reduce demand are considered before options to reduce the carbon content of supplied energy.

These issues might best be addressed within any guidance that the Department is planning to provide to householders on PD rights for microgeneration in Northern Ireland.

Q1: Should a simplified regulatory regime of PD rights be provided to facilitate microgeneration development?

The planning system is one of the key barriers to the uptake of microgeneration technologies. As such Energy Saving Trust strongly supports the Department's intention to simplify the regulatory regime of PD rights to facilitate the uptake of microgeneration measures. Our research undertaken in 2005 (on behalf of DTI)¹ suggests that 30-40% of the UK's electricity demands could be met through microgeneration technologies by 2050. However, a more favourable policy framework is required to help microgeneration reach its full potential. Amongst other measures the provision of PD rights for microgeneration is a key policy requirement.

Many consumers in NI have expressed frustration about planning permission requirements for microgeneration. Not only is applying for planning permission a 'hassle' for consumers, but the fee for planning applications (£200) adds significantly to the overall cost of installing specific technologies.

Providing all microgeneration technologies if installed in the right location with PD status would ensure that consumers avoid unnecessary costs and encourage purchases by consumers and investment by manufacturers.

Q41: Should tower mounted wind turbines erected within the cartilage of a dwellinghouse have PD rights, and Q42: Should wind turbines attached to a dwellinghouse or other buildings within the cartilage of a dwellinghouse have PD rights?

The consultation document requests views on '*whether it is feasible to provide PD rights for wind turbines that would assist rollout of the technology or should each case be considered on its merits through the planning application process*'. As noted above the current planning system is one of the key barriers to the uptake of microgeneration technologies. We therefore believe that, as far as possible efforts should be made in NI, to provide tower mounted, and dwellinghouse mounted wind turbines with PD rights. Clearly a blanket approach will not be possible, and in this context we would signpost the Department to the research commissioned by CLG to inform thinking on the provision of PD rights for microgeneration in England and referenced in the current CLG consultation on this issue (for further details see: http://www.communities.gov.uk/pub/367/ChangestoPermittedDevelopmentConsultationPaper1PermittedDevelopmentRightsforHoun_id1509367.pdf), and research undertaken on behalf of the Scottish Executive (for further details see: <http://www.scotland.gov.uk/Resource/Doc/173656/0048437.pdf>). This research may also help inform the Department's views on the detail relating to the provision of PD rights for other microgeneration technologies.

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¹ Energy Saving Trust, Element Energy Limited, Cambridge University Faculty of Economics and E-Connect for DTI, *Potential for Microgeneration, study and analysis, 2005*
For the executive summary see: <http://www.dti.gov.uk/energy/consultations/pdfs/microgeneration-est-summary.pdf>
For the DTI press release see: <http://www.gnn.gov.uk/environment/detail.asp?ReleaseID=181382&NewsAreaID=2&NavigatedFromDepartment=False>