



Our Ref: DMcC/AL/KS

28 January 2010

Micro-Generation Permitted Development Consultation  
Planning Service  
3<sup>rd</sup> Floor  
Millennium House  
17-25 Great Victoria Street  
BELFAST  
BT2 7BN

Dear Sir/Madam

**Re: Antrim Borough Council - Corporate Response**

Further to the above matter, Council recognises the importance of this consultation process and seeks to contribute to the exercise where appropriate.

Council has expressed support for the draft proposals for both domestic and non-domestic micro-generation technologies, in terms of the potential to reduce the burden on the existing planning system, the opportunity to align PD regulations with the rest of the UK and Republic of Ireland, and the relevance to local authorities ahead of the transfer of planning functions to Councils.

However, during consideration of this paper, a number of comments and reservations were also expressed. These are noted below for your information:

- *Council agrees that the provision of specific permitted development rights for micro-generation technology and development will help to clarify and strengthen the Department's existing legislative provision, and, at the same time, help to promote the take-up of such equipment by reducing the regulatory burden on potential domestic and non-domestic applicants;*

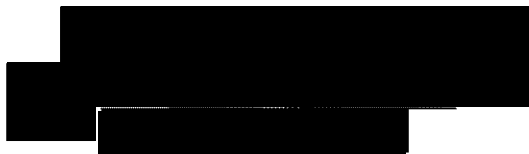
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- *As highlighted in the corporate response to the Householder consultation, Council recommends that, where possible, the Department consider improving the alignment between the current planning and building control regulations, to minimise the potential for confusion for the end user. This current consultation and the anticipated transfer of planning functions to local authorities appears to offer an ideal window of opportunity to better explore this option;*
- *Council concurs with the objective of seeking to minimise any detrimental impacts where possible and where appropriate, including in respect of those technologies considered by the Review;*
- *In respect of removing permitted development rights for roof mounted solar panels in AONBs and National Parks where visible (Q12, p.11), Council believes that restrictions should justifiably exist, and given the impact that such works can have in such areas, which are considerably smaller than their mainland counterparts. Whilst it is felt that the issue of scale is a relevant consideration in Northern Ireland, this rebuttal does not tackle or alleviate the energy needs of such areas, so alternatives must be considered, including providing scope for better integration (camouflaged?) between the proposed site and the proposed technology;*
- *It would appear that the proposals will only impact on retro-fit proposals – where micro-generation is proposed for new properties, it will still be part of the full planning application process, so the full benefit of the new permitted development regulations will not be realised;*
- *Minor details such as wall mountings, fixtures and fittings (Q21, p.14) need to be considered against a backdrop of health and safety issues which may preclude against inclusion within any emerging permitted development rights, and requires clarification; and,*
- *Council is concerned that the proposed policies offer no appreciation of the currently available technologies. The proposals are seen as rigid and prescriptive, and not at all embracing of the dynamic culture of the renewable energy sector, where technological change will continue to be rapid. Such inflexibility may render any emerging policy document obsolete almost immediately, and so, Council recommends building flexibility into the policy document and being less prescriptive, by perhaps offering a range of industrially acceptable dimensions and values. The proximity of residential areas to non-domestic land uses – such as industrial estates – may lead to a detrimental impact on amenity, through noise, vibration, shadow-flicker, airborne particulates etc. This will require careful monitoring.*

It is hoped that this information will be helpful. Where no specific reference has been made, the Department should assume that Council is in favour of the proposal.

Please acknowledge receipt of this submission, and do not hesitate to contact me if you require any further details.

Yours faithfully

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Chief Executive