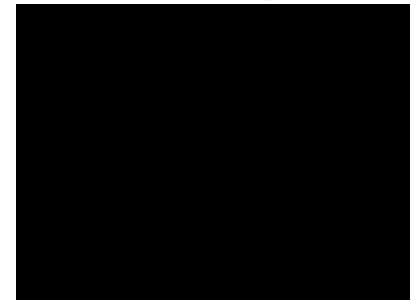


**Roads Service Headquarters**  
**Director of Engineering**



[www.roadsni.gov.uk](http://www.roadsni.gov.uk)

Permitted Development Consultation  
(Householder, Non-Householder & Micro-  
Generation)  
Planning Service  
3rd Floor  
Millennium House  
17-25 Great Victoria Street  
Belfast  
BT2 7BN

Your ref: AEL 2109/vm  
Our ref: W 326

Date: 18 January 2010

Dear Sir

**CONSULTATION PAPERS ON REVIEW OF PERMITTED DEVELOPMENT RIGHTS –  
HOUSEHOLDER, NON-HOUSEHOLDER, & MICRO-GENERATION**

Thank you for your e-mail of 22 October 2009 seeking views on the above consultation papers. Roads Service wishes to make the following comments:-

**Key Reply and Comment:-**

During the pre-consultation process Roads Service was asked to submit comments to ENTEC and Planning Service in relation to non-householder permitted development rights. These comments highlighted road safety concerns in relation to access and movement.

I note these concerns (contained in Review of Non-Householder Permitted Development Rights – Final Report) have not been addressed in the consultation papers. Road Safety is a key priority for Roads Service and any policy that increases risk is unacceptable.

In relation to all three consultation documents it is our opinion that any development which impacts on existing/approved parking and/or turning areas within a site curtilage should not be permitted development. Such proposals resulting in loss of parking or turning facilities should be subject to an application.

Similarly if a non-householder permitted development proposal results in a significant increase in access traffic, then an assessment needs to be carried out of the access layout, existing parking and turning, and any necessary improvements undertaken (e.g. sightlines). The current proposal will lead to traffic intensification on sub-standard accesses, and is unsafe.

I hope you find these comments helpful.

Yours sincerely



**R J M CAIRNS**  
Director of Engineering