



Response to Consultation

Date: 22 January 2010
Consultation: Permitted Development Rights for Microgeneration Development

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide 30,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background

The Housing Association movement in Northern Ireland is committed to reducing climate change through environmental sustainability. Our members are at the forefront of sustainable house building with homes built to robust environmental standards. Housing Associations are currently aiming to reduce their carbon footprint by achieving level 3 of the Code for Sustainable Homes and they aspire to meeting level 6 of the code by 2012.

General Comments

The Northern Ireland Federation of Housing Associations welcomes the opportunity to comment on the proposed changes to Permitted Development Rights. We view the extension of development rights for renewable or low carbon technology as an asset in reducing the effects of climate change on our society and consider that changes to the General Development Order, Northern Ireland, 1993 (GDO) which reduce the complexity of the planning regulations are welcome in terms of enabling and encouraging greater production of low carbon technology.

Specific Comments

Review of Non Householder and Householder Permitted Development Rights

The Federation acknowledges that the consultation paper intended to be clear with regard to the specific regulations surrounding Permitted Development Rights but considers that they are still lengthy and ambiguous, making their interpretation difficult.

1. Specifically we would ask where the responsibility will lie with regard the removal of obsolete microregeneration equipment and how this will be enforced as we are concerned with the impact on the environment if unused equipment were left in place.
2. The existing planning regulations should still apply to areas of natural beauty (AONB), World Heritage sites, Conservation areas and any other areas of public interest as the Federation want to be assured that a balance is maintained between the need for low carbon technology and conserving the beauty of our countryside.
3. Permitted development rights should not be extended to allow for the construction of more than two wind turbines in any area. The construction of more than two in a given area would need to be evaluated on a case by case basis to consider their impact on the environment.
4. The consultation paper does not identify if any research has been undertaken, by the consultants, to determine the potential for some microgeneration equipment to cause seizures. Permitted development rights should be restricted for this type of equipment to areas of low population until appropriate research has been undertaken which shows that this is not a hazard.
5. Permitted development rights should only apply to micro regeneration equipment that does not encroach on neighbouring buildings curtilage or roads. The distance between the equipment and buildings or roads should be appropriate for the size or span of the equipment to ensure there is no disturbance to adjacent property or the occupiers.
6. Buildings to house microgeneration equipment should only have permitted development rights when they are constructed in such a way as to ensure that they do not cause disturbance to adjacent property or occupiers. Any changes to the original buildings or flues should only be made on a like for like basis. The buildings should, where possible, be sensitive and suited to their environmental location.
7. Permitted development rights should only be granted where the microgeneration equipment does not cause any emissions which may

be considered to be detrimental to the environment. Included in this is that noise levels must not cause disturbance to the population in the locality.

I hope you find these comments useful.

Submitted on behalf of NIFHA by:

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NIFHA – Working Together for Better Housing

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