



**SSE Renewables - Response to  
Consultation on Review of Non-Householder Permitted  
Development Rights**

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# Response to Consultation on Review of Non-Householder Permitted Development Rights

## Introduction

SSE Renewables welcomes this review of non-householder permitted development rights. In particular we support the objectives of improving the efficiency of processing applications and application of more proportionate decision-making mechanisms. Any reform that improves the efficiency of processing and establishes predictable planning timescales is certainly to be welcomed.

As a renewable energy developer and utility, we have only responded to those sections of the Consultation that address aspects of planning relevant to our business.

## Consultation Section 4 – Cross-Cutting Themes

### Communicating the GDO

We are surprised that the GDO is not available online, considering that this is generally the preferred access route to information for most users. It is of particular benefit when the online source is maintained so that users can be certain that they are accessing the latest version. In terms of comprehension a Plain English guide would be useful, but we believe the most important issue at present is to provide on-line access to a consolidated document that is maintained up-to-date.

### Prior Approval

We support the recommendation that Prior Approval should not be re-introduced as a feature of permitted development rights in the new PDO.

### Local Development Orders

We do not believe that it would be appropriate for local planning authorities to have the power to vary permitted development rights in specific areas. Exercise of any such power would be likely to result in uncertainty and unnecessary applications in relation to works covered by PDOs and vice versa.

### Article 4 Directions

The Consultation correctly identifies that policy consistency is a key issue for developers (and utilities). This is indeed a key issue and we therefore believe that it is inappropriate for local authorities to have the ability to vary permitted development rights. However in the specific case of Sensitive Areas it is reasonable to restrict these rights if the rules are explicit and unambiguous.



### Sensitive Areas

As the particular nature of sensitivity differs between designated areas, we believe it is reasonable that the limitations of permitted development rights should also be set differently for different types of area.

## **Consultation Section 5 – Utilities**

### Class C (Electricity Undertakings)

We strongly support the proposed removal of the 100m length limitation on single user service lines. However we cannot understand why this should be replaced with a 400m limitation. As there is no limit for comparable development in GB and since the current recommendations are, at least in part, based on demand for change to align PD rights in Northern Ireland with those in the rest of GB and/or RoI, the logic underlying the proposed 400m limit is unclear. The fact that it is likely to reduce the level of planning applications by around 70% has pragmatic rather than intrinsic value, but the same argument could equally be used to justify a 10km line length, on the grounds that it would eliminate 100% of applications. The length limitation should therefore be removed in order to meet the stated objectives of the Review.

The issue of lines connecting renewable generation developments to the Grid has not been addressed by these recommendations. PD rights should emphasise that a grid connection is essential to complete any (eg) windfarm project and that a grant of planning permission for a windfarm implicitly accepts that a connecting line will be built. Planning and environmental issues relating to the area of the development will have been investigated thoroughly prior to grant of the planning permission and a separate planning application for the connecting line therefore represents a degree of duplication.

Class C PD rights for Electricity Undertakings should therefore be extended to include overhead connections to single windfarm developments, for which planning permission has already been granted. For the preservation of amenity, such rights could be restricted to lines constructed on wooden poles and restricted in sensitive areas.

