



Project:	Response to Consultation Paper on Householder Permitted Development Rights
Client:	Lisburn City Council
File Ref:	LISB2008
Date:	15 December 2009

A. INTRODUCTION

1. This short report has been prepared for Lisburn City Council by Turley Associates to provide an overview of the proposed changes to Householder Permitted Development Rights (DoE consultation Paper October 2009).
2. All 'development' requires planning permission by virtue of the Planning (NI) Order 1991 as amended but certain small scale development is permitted by virtue of the Planning (General Development) Order 1993 (GDO) as amended. This development is permitted subject to certain conditions specified in the GDO and a person carrying out the development may ask Planning Service to confirm that the development is permitted by applying for a Certificate of Lawful Use or Development (CLUD) although this is not necessary.
3. Part 1 of the GDO relates to development within the curtilage of a dwelling house and includes extensions to dwellings, alterations to a roof, porches, buildings in gardens, hard standing and oil/LPG storage. Part 2 relates to 'minor operations' and applies to all development, not just householder development. It includes gates and fences, access to roads and painting the exterior of any building.

B. BACKGROUND AND PURPOSE OF PROPOSED CHANGES

2. The 2003 Modernising Planning Processes paper (DoE) recommended a review of Permitted Development (PD) rights with a view to extending their scope. At that time a review was undertaken by Nathaniel Lichfield and a further review was undertaken in 2008 by White Young and Green (WYG). It is estimated that the proposed changes to householder PD rights will result in a reduction of 20% in the overall number of householder applications.
3. The objectives of the proposed changes are to extend and clarify PD rights to householders, reduce bureaucracy faced by users of the planning system, and reduce the number of planning applications, allowing Planning Service to focus on more strategic and complex planning proposals.

4. The DoE's aims are to bring forward a system that is :
 - (a) easy to understand;
 - (b) proportionate to the anticipated impacts of the development;
 - (c) simple and economic to operate for users and the planning authority; and
 - (d) controls impact on local amenity and environmental interests, including the built heritage.
5. The proposed new system is designed to be 'impact based' with four levels of impact. Level 1 is the impact on the host property; Level 2 is the impact on adjoining neighbours; Level 3 is the impact on the street scene; and Level 4 impact is where the property lies in a particularly sensitive area or specific planning policies applying to the area might be breached, or because the development would in combination with other similar developments give rise to environmental problems. Sensitive areas in the Consultation Document include Conservation Areas (CA), the setting of Listed Buildings (LB), Areas of Outstanding Natural Beauty (AONB), World Heritage Sites (WHS), National Parks (NP), Areas of Special Scientific Interest (ASSI) and Areas of Archaeological Potential (AAP).
6. The proposed changes are divided in the consultation document into four sections:
 - (a) proposals for extensions, roof alterations and extensions, and porches;
 - (b) proposals for building within the curtilage of a dwelling;
 - (c) Hard surfacing; LPG/oil storage; flues; decking; basement extensions - Part 1 of the GDO; and
 - (d) Minor Operations (Part 2 of GDO).

Main Changes proposed for extensions

5. The main changes are to give easily understood dimensions (rather than volume) for single and 2 storey extensions (height, length; distance from boundaries; set back from roads; % of curtilage covered). In the current GDO side extensions to dwellings are not permitted but the proposals are to allow these subject to limitations on breadth and height. Clarification of the wording on an extension's allowable materials is included – from the previous GDO requirement for 'conformity' to 'similar in appearance'. It is proposed to allow side windows on extensions but that upper floor windows within 15m of the boundary of the curtilage of a neighbouring house will have to be of obscure glass with restrictions on openings below 1.7 m. There will be no PD where the proposal extends beyond the side elevation of the existing house which fronts onto a road. Basement extensions have not been included in PD due to perceived impact on a street scene and potential flooding. There is to be no PD for extensions to dwellings within the curtilage of a Listed Building unless Listed Building Consent has previously been granted and there are to be restrictions on PD within CAs, WHSs, AONBs, NPs (cladding, height etc),

Main Changes proposed for roof alterations and roofspace conversions

6. The impacts from roof alterations and roofspace conversions are regarded as being Level 3 (street scene) and Level 4 (wider area) plus some Level 2 (overlooking) impacts. New dormer windows to the front of a dwelling are to continue NOT to be PD but there will be some flexibility with regard to dormers to the rear.

The proposals are to introduce dimension based criteria rather than volume criteria (height, extension beyond the existing plane of the front/side roof fronting onto a road, proximity to the ridge and eaves etc). Any proposed side windows are covered by the same criteria relating to obscure glass/openings as for extensions (see above). As with extensions, materials must be 'similar in appearance' to the dwelling. Development within a Conservation Area or within the curtilage of a Listed Buildings (unless Listed Building Consent previously granted) are excluded from PD.

Main Changes proposed for Porches

7. The proposals are to allow larger porches than at present and retain the current minimum setback of 2 m from a road. The PD will be subject to conditions as to height and ground area (3 sq m) and materials must be similar in appearance to the dwelling. There will no restriction of PD within a CA, but there will be no PD within the curtilage of a Listed Building unless Listed Building Consent has previously been granted.

Main Changes proposed for Buildings within Curtilage

8. The proposals cover outbuildings, garages and swimming pools and PD is to be criteria based, on height, site coverage and proximity to the boundary, moving away from the current volume based criteria. As is currently the case outbuildings to be used as living accommodation is not PD. The impacts are considered to be largely from overbearing and overshadowing on neighbours (Level 2) and impacts on the street scene (Level 3). There is a proposal to require larger outbuildings in certain designated areas to be positioned close to the dwelling (AONB, NP and WHS) and such buildings will not be PD within the curtilage of a Listed Building unless a Listed Building Consent has previously been granted for the development. In CAs, AONBs, WHSs and NPs development will not be PD where it is between the front or side elevation and the boundary of the curtilage. Pigeon lofts will continue to have no PD rights within the curtilage of a dwelling.

Main Changes proposed for new or replacement hard surfacing

9. The issues with hard standing to the front and side of dwellings is townscape quality and run off. The proposal is to require larger areas of hardstanding (5 sq m plus) to the front of a dwelling to be porous. There is to be no PD within the curtilage of a Listed Building unless a Listed Building Consent for the development has previously been granted. It is not proposed to apply additional controls on hardstanding in Conservaton Areas.

Main Changes proposed for oil storage/LPG

10. The proposals are to restrict PD for such development where they could be visible from public roads, particularly in CAs. Oil storage/LPG must not be forward of the building's front or side elevation facing a road; be more than 2 m from a rear boundary where there is a road, have a maximum capacity of 3500 litres and a maximum height of 3 m. There are tighter location controls proposed within CAs and development is not PD within the curtilage of a Listed Building unless a LBC has previously been granted.

Main Changes proposed for Flues, Chimneys, vent pipes etc

11. It is proposed to have new specific PD rights for chimneys and flues etc subject to height restrictions, and no PD within AONBs, CAs, WHSs and NPs on front/side elevations fronting a road. Within the curtilage of Listed Building there is to be no PD unless there is a Listed Building Consent for the development already granted.

Main Changes proposed for Decking, Balconies, Verandas etc

12. It is proposed that the erection of a deck, balcony, veranda or other platform within the rear curtilage of a dwelling will be PD so long as the height does not exceed 0.3 m above ground level. There are tighter location controls proposed within CAs and development is not PD within the curtilage of a Listed Building unless a LBC has previously been granted.

Main Changes proposed for Minor Operations – Part 2

13. There is some clarification of PD for gates, fences, walls etc; accesses required in connection with other PD in the proposed Order (not access to special, trunk or classified roads); and exterior painting.

C. CONCLUSIONS AND RECOMMENDATIONS

14. Overall the proposals are detailed and do not always achieve the DoE's ambition to achieve clarity and simplicity. LCC should ensure that the accompanying advice to the proposed Order is written simply and with appropriate diagrams.
15. We believe that Lisburn City Council should support the concept of extending the scope of permitted development for householders but in our view that the consultation paper is confusing about the treatment of 'sensitive areas' (sometimes referred to as 'designated areas' in the Consultation Paper). In the proposals these sensitive areas include CAs, the curtilage of Listed Buildings, National Parks, AONBs and World Heritage Sites. However in the proposed non householder PD consultation paper different designated areas are referenced (eg ASSIs) and no mention is made of Special Areas of Conservation (SACs) in either Consultation. Both sets of proposals must be written consistently so that the new GDO is clear and coherent. The 'setting' of a Listed Building is protected by statute, and not just the curtilage of a Listed Building. We believe that Conservation Areas are worthy of protection and that there should be limited PD within Conservation Areas as GDO Art 4 Directions are rarely used by DoE.
16. We consider that the current system of calculating PD by volume is difficult to understand and that the proposed system of calculating dimensions will be considerably clearer. It will also remove the need to refer back to the size of the original dwelling house and to subsequent extensions, which is currently necessary.
17. We believe that the requirement to have obscure glass on upper floor side windows of extensions and roof extensions where they are 15 m from the boundary of another dwelling is unreasonable. We believe that clear glass should be allowed where there is written consent from the affected neighbour or there is

intervening screen vegetation. We believe that, in any event, the dimensions should be gable to gable and less than 15 m.

18. We believe that developers should be able to take advantage of 'householder' PD rights even before a dwelling is occupied as often a builder has to apply for planning permission for changes required by purchasers such as the addition of conservatories or garages. It does not seem to serve any useful planning purpose to make the builder apply for planning permission for development that would be PD once the dwelling is occupied.
19. We support having no PD for pigeon lofts.
20. Attached is the consultation paper questionnaire completed in draft. Subject to the Council's views we recommend that both a letter and the completed questionnaire be returned to Planning Service.



HOUSEHOLDER PERMITTED DEVELOPMENT RIGHTS CONSULTATION PAPER RESPONSE FORM

Once you have completed this form please
return to

Policy and Legislation Branch
3rd Floor
Millennium House
Great Victoria STREET
Belfast
BT2 7BN

by fax (marked 'Planning Householder PD
Consultation Response') to:
028 9041 6960

Or by e-mail to:
Planning.householderpd@doeni.gov.uk

All responses should be submitted to the
Department no later than 22nd January 2010



Department of the
Environment
www.doeni.gov.uk



INVESTORS IN PEOPLE

RESPONDENT INFORMATION

Please Note that this form **must** be returned with your response to ensure that we handle your response appropriately.

In keeping with our policy on openness, the Department will make responses to this consultation paper publically available. When publishing responses received on behalf of organisations the Department will also publish the organisation's name and address. When publishing responses received on behalf of individuals the Department will not publish details of the individual's name and address.

1. Name/Organisation

Organisation Name

Lisburn City Council

Title

Mr ☐ Ms ☐ Mrs ☒ Miss ☐ Dr ☐ *Please tick as appropriate*

Surname

Forename

2. Postal Address

Postcode:

Phone:

Email:

3. Are you responding:

As an individual ☐

On behalf of a group / organisation ☒

4. Which of the following best describes the capacity in which you are responding:

Developer ☐

Agent/Architect ☐

Business ☐

Member of Public ☐

Environment Group ☐

Council / Councillor ☐

MLA, MP, MEP ☐

Other ☒ Please state:

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5. Acknowledgment

Individual responses will not be acknowledged unless specifically requested

Householder Permitted Development Rights

Chapter 4: Impact Based Approach

Question 1

Do you agree that an impacts based approach is an appropriate means to ensure an appropriate level of protection for residential amenity and the environment?

Yes ☒ No ☐

This is an appropriate approach to 'permitted development' subject to consistent protection of sensitive areas - particularly Conservation Areas. The Council is not convinced that these are treated consistently throughout the rest of the consultation document.

Question 2

Do you agree that overlooking, overshadowing, overbearing presence and disturbance are the main concerns for householder developments that may have an impact on the immediate neighbour?

Yes ☒ No ☐

Loss of daylight and sunlight is presumaly included in overshadowing.

Question 3

Do you agree with restrictions on development to or in front of a principal or side elevation which faces onto a road are required in order to protect the amenity of the street scene?

Yes ☒ No ☐

Question 4

Do you agree that development should be restricted in areas of greater sensitivity, but that some degree of flexibility should be allowed for householders?

Yes ☐ No ☒

Listed buildings and their settings are protected by statute and we believe that developments which affect the character of a listed building or its setting should not be permitted development.

We also believe that Conservation Areas should be carefully selected so that they are really deserving of that designation. Areas not worthy can be designated as ATCs. If CAs are worthy of such a designation there

should be no or very constrained householder PD within the designated area. It is not sufficient to rely on Art 4 of the GDO to remove PD reights as this is rarely used by DoE.

Question 5

Do you agree that development within the curtilage of Listed Buildings should not be permitted unless Listed Building Consent has previously been granted?

Yes ☒ No ☐

Although 'previously been granted' is unclear. If there is a period of years following the grant of LBC, would the propoal still be PD within the GDO?

Chapter 6: Proposals for Extensions, Roof Alterations and Process

Class A – The enlargement, improvement or other alterations to a dwellinghouse

Question 6

Do you agree that a change to a dimension based criteria for enlargements, improvements or other alterations will be easier for householders to interpret?

Yes ☒ No ☐

Question 7

Do you agree that up to 50% (as in the current GDO) of the total area of the domestic curtilage (excluding the original dwellinghouse) could be covered by buildings?

Yes ☒ No ☐

Subject to the other restrictions about closeness to boundaries.

Question 8

Do you agree it is acceptable to permit two storey extensions to the rear of a dwelling subject to restrictions on height within 2 metres of the boundary and overall length?

Yes ☒ No ☐

Question 9

Do you agree that 4 metre long single storey extensions should be permitted development on detached houses?

Yes ☒ No ☐

Subject to other restrictions about proximity to boundaries.

Question 10

Do you agree that restrictions are required on the proximity of rear extensions to the boundary of the curtilage of the dwellinghouse with a road opposite the rear wall of the dwellinghouse?

Yes ☒ No ☐

Although the way this is expressed would not be clear for the layman.

Question 11

Do you agree that finishes should be "similar in appearance" to the existing dwellinghouse?

Yes ☒ No ☐

Again in Conservation Areas and within the setting of Listed Buildings there should be a greater restriction than similar in appearance as there might be a situation where mock stone would not be acceptable if the surroundings are of real stone - even though both might arguably be similar in appearance.

Question 12

Do you agree that the requirement for first floor windows in side elevations which are within 15 metres of the boundary of the curtilage of a neighbouring dwellinghouse to have obscure glazing and be non opening unless at least 1.7 metres above floor level, is reasonable to protect against overlooking?

Yes ☐ No ☒

The distance should be from gable to gable rather than to the boundary. This proposed distance to the boundary is excessively restrictive. There is no account taken of intervening visual barriers such as treed hedges. We would suggest a reduced distance to the boundary as standard, with it possible to have low level window opening and clear glass where there is a visual barrier between the two properties or with the written consent of the neighbour.

In 6.14 the proposed wording of Class A has a mistake at (h) in terms of the verb (should be 'has') and is confusing at (i - n) which refers to development within Class B - flues, decking etc. This could be more clearly set out.

Question 13

Do you agree that restrictions should be imposed within conservation areas, world heritage sites, AONBs and national parks?

Yes ☐ No ☐

Yes we agree with the criteria applying as a minimum to all 4 types of sensitive area.

However, we consider that more restrictive criteria should apply to Conservation Areas and WHSs. The other two designations are very extensive geographically and there should be a difference in how CAs and WHSs are treated for PD purposes compared to AONBs and NPs.

Class B –The enlargement, improvement or other alteration of dwellinghouse consisting of an addition or alteration to its roof

Question 14

Do you agree that a change to a dimension based criteria for roof extensions and alterations will be easier for householders to interpret?

Yes ☒ No ☐

Yes but there are unclear elements to the proposed Class B. For example B1 c definitely needs a diagram and under Conditions B2 (a) it is not clear whether say velux windows or solar panels could be included if not included in the original roof.

Again B1d could be set out differently.

Question 15

Do you agree that the 0.5 metre set backs from ridge, eaves and verge are sufficient to control adverse impacts?

Yes ☒ No ☐

Although what this means will not be clear to the average householder.

Question 16

Do you agree that where an alteration to the roof extends more than 15 centimetres beyond the plane of the roof that forms either the principal or side elevation of the dwellinghouse, that faces a road, it should require planning permission?

Yes ☒ No ☐

This needs a diagram.

Question 17

Do you agree that roof extensions or alterations should not be permitted in conservation areas?

Yes ☒ No ☐

Question 18

Do you agree that the requirement for first floor windows in side elevations of the roof alteration which are within 15 metres of the boundary of the curtilage of a neighbouring dwellinghouse to have obscure glazing and be non opening unless at least 1.7 metres above floor level, is reasonable to protect against overlooking?

Yes ☐ No ☒

As with extensions referered to in Q 12 above we think that this distance is excessive.

Class C –The erection or construction of a porch outside any external door of a dwellinghouse

Question 19

Do you agree that the floor area of porches should be increased from 2 square metres to 3 square metres without adverse impact?

Yes ☒ No ☐

Except in Conservation Areas, World Heritage Sites and within the setting of listed buildings.

Question 20

Do you agree that porches with a pitched roof should be allowed to be higher than those with a flat or mono pitched roof?

Yes ☒ No ☐

This seems reasonable.

Question 21

Do you agree that a minimum 2 metre set back from the road (as in the current GDO) should be retained?

Yes ☒ No ☐

Question 22

Do you agree that additional controls on porches should not be introduced in conservation areas or other designated areas?

Yes ☐ No ☒

We consider that there would be no PD for porches on front elevations or side elevations fronting onto a road in Conservation Areas, within the setting of Listed Buildings and in World Heritage Sites.

Chapter 7: Proposals for Buildings in Curtilage

Class D – The provision within the curtilage of a dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse, or the maintenance, improvement or other alteration to such a building or enclosure

Question 23

Do you agree that a change to a dimension based criteria for buildings within curtilages will be easier for householders to interpret?

Yes ☒ No ☐

Yes and we further suggest no PD rights for development in Conservation Areas, development within the setting of Listed Buildings and for development in World Heritage Sites.

Question 24

Do you agree that the current 5 metre link between dwellinghouses and outbuildings does not serve any useful planning purpose?

Yes ☒ No ☐

Question 25

Do you agree that a maximum height of 4 metres should minimise the impact of outbuildings upon neighbouring amenity and the streetscene?

Yes ☒ No ☐

Subject to distances from boundaries. We note that in D1 it is proposed that height be restricted to 2.5 m within 2 m of a boundary. That is sensible.

Again
in proposed D1 it is confusing to have (f) and (g). These should be referred to differently as are classes in their own right.

Question 26

Do you agree that an eaves height of 2.5 metres within 2 metres of the boundary is reasonable?

Yes ☒ No ☐

Yes as above.

Question 27

Do you agree that outbuildings in areas designated for their landscape character should not exceed 10m² when situated more than 20 metres from the dwelling?

Yes ☒ No ☐

This relates to the visual impact of outbuildings which are separate from their host dwelling.

We have already suggested that the World Heritage Site is treated differently that NPs and AONBs.

Question 28

Do you agree that restrictions are required on the proximity of outbuildings to the boundary of the curtilage of the dwellinghouse with a road opposite the rear wall of the dwellinghouse?

Yes ☒ No ☐

Yes although this criterion is difficult for the lay person to understand.

Question 29

Do you agree that pigeon lofts should remain subject to planning control?

Yes ☒ No ☐

Absolutely as there are nuisance issues such as bird droppings in adjoining gardens involved with pigeon lofts that have not been set out clearly in the consultation paper.

Chapter 8: Other Issues within Part 1 of the GDO

Class E – The Provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse; or the replacement in whole or in part of such a surface

Question 30

Do you agree that hardstanding around a dwelling should normally be permitted (as in the current GDO)?

Yes ☐ No ☒

This can have a level 3 impact on the street scene and there would be restrictions in sensitive areas such as CAs and WHSs. We note the restriction within the curtilage of a Listed Building.

Question 31

Do you agree there should be a requirement for all hard surfaces over 5m² located between a wall forming the principal elevation of the dwellinghouse and a road to be constructed in porous or permeable materials?

Yes ☒ No ☐

This seems reasonable.

Question 32

Do you agree that new controls on hardstanding should not be introduced in conservation areas?

Yes ☐ No ☒

We consider that controls on all hardstanding in CAs should be introduced and for the sake of consistency, this should also apply to WHS development. The visual impact of hardstanding can be very damaging in a street scene.

We note that development within the curtilage of a Listed Building is only PD where LBC has been granted.

Class F – The erection or provision within the curtilage of a dwellinghouse of a container for the storage of oil or liquid petroleum gas for domestic purposes

Question 33

Do you agree that the capacity for both oil and liquid petroleum gas containers should now be 3,500 litres?

Yes ☒ No ☐

Question 34

Do you agree that the maximum height for both oil and liquid petroleum containers should now be 3 metres above ground level?

Yes ☐ No ☒

This seems unnecessarily high and taller than most hedges and fences.

Question 35

Do you agree that restrictions are required on the proximity of containers to the boundary of the curtilage of the dwelling with a road opposite the rear wall of the dwelling?

Yes ☒ No ☐

We note the exception for development within the curtilage of listed buildings where LBC must have previously been granted.

Class H – The installation, alteration or replacement of a chimney, flue, soil and vent pipe on a dwellinghouse

Question 36

Do you agree with the introduction of a new permitted development class for chimneys, flue's or soil and vent pipes on a dwelling house?

Yes ☒ No ☐

There is a punctuation error in 'flues'.

Question 37

Do you agree that chimneys, flues etc should be permitted to extend 1 metre above the height of the roof?

Yes ☒ No ☐

Question 38

Do you agree that additional restrictions are required within conservation areas, world heritage sites, AONBs and national parks?

Yes ☒ No ☐

We also note the exception for development within the curtilage of listed buildings where LBC must have previously been granted.

Class I – The erection, construction or alteration of a deck, balcony, veranda or other raised platform within the curtilage of a dwellinghouse

Question 39

Do you agree with the introduction of a new permitted development class for decks, veranda's or balconies within the curtilage of a dwellinghouse?

Yes ☒ No ☐

There is a punctuation error in 'verandas'.

Question 40

Do you agree that a restriction of 0.3 metres in height above ground level should be imposed on any part of the deck, veranda, or balcony?

Yes ☒ No ☐

Question 41

Do you agree that additional restrictions should be imposed within conservation areas?

Yes ☒ No ☐

There should be a restriction for both CAs and for development in WHSs. Class I c is not clear however. Does it mean fronting a road?

We note the restriction for development within the setting of a listed building.

Basement extensions

Question 42

Do you agree that permitted development rights for basement extensions should not be included in a revised GDO?

Yes ☒ No ☐

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Environmental Assessment

Question 43

Do you agree that the criteria under Schedule 2 of the Planning (Environmental Impact Assessment) Regulations (NI) 1999 do not require amendment in response to the proposed changes to householder PD rights?

Yes ☒ No ☐

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Chapter 9 – Part 2: Means of enclosure, access and painting

Class A – The erection, construction, maintenance, improvement or alteration or a gate, wall or other means of enclosure

Class B - The formation, laying out and construction or alteration of a means of access to a road which is not a special, trunk or classified road, where that access is required in connection with development permitted by any class in this Schedule (other than by Class A of this Part).

Question A

Do you agree that it is necessary to retain conditions in respect of accesses in sites of archaeological interest, and to impose similar controls in areas of special scientific interest?

Yes ☒ No ☐

Yes but PD rights seem very liberal. We consider that accesses can have a detrimental visual impact. We have suggested no PD for CAs and WHSs and this would bring control to accesses for such proposed developments.

Class C – The painting of the exterior of any building or work

Question 45

Do you think the provisions of Part 2 should also be detailed into a Part A which will then address all householder developments for ease of reference??

Yes ☒ No ☐

Chapter 10 – Conclusions

Question 46

Do you agree that a User Guide on the GDO would be useful for householders and professionals?

Yes ☒ No ☐

This is essential as many of the measurements and exclusions are difficult for the layman to understand and this can result in unnecessary applications.

Question 47

Do you agree that the impacts based approach provides a good basis on which to revise the GDO?

Yes ☒ No ☐

Question 48

Do you agree that the proposed revisions should facilitate a GDO which:

- is easy to understand;
- is proportionate to the anticipated impacts of such development;
- is simple and economic to operate for both developers and the planning authority; and controls impacts upon local amenity and environmental interests, including the built heritage?

Yes ☐ No ☒

We think that the proposed revisions are not easy to understand and some further work needs done on that. We do not think that Conservation Areas, World Heritage Sites and the setting of Listed Buildings have been given sufficient protection and they are not consistently treated throughout.

Question 49

Do you have any comments on the proposed definitions?

Yes ☐ No ☐

Some fo the definitions refer to other legislation which is not helpful to the reader. It would be clearer to repeat the definition given in this legislation.

Where reference is made to legislation eg the Planning (NI) Order 1991 surely it should be the Planning (NI) Order 1991 as amended.

PLEASE FEEL FREE TO COMMENT ON ANY OTHER MATTER RELEVANT TO THIS REVIEW AND THE PROPOSED REVISIONS.

THANK YOU FOR TAKING TIME TO COMPLETE THIS QUESTIONNAIRE