

22 January 2010

Microgeneration Permitted Development Consultation
Planning Service
3rd Floor
Millennium House
17-25 Great Victoria Street
Belfast
BT2 7BN

Dear Sirs,

UFU response to Microgeneration Permitted Development Consultation

The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 12,500 farming families. The farming community is the main stakeholder in land-based renewable energy sector and therefore the UFU welcomes the opportunity to respond to the Microgeneration Permitted Development Consultation.

The UFU's membership has experience of many of the areas covered by the Consultation, however, we feel that other organisations will cover these and should we comment as well, this would create a replication of views.

Consequently, we will limit our response to one specific section; Anaerobic Digestion (AD) Plants section 8.2.2.

AD is a technology which the agricultural industry in Northern Ireland has close connections with, both as an innovator and as an input source. AD as with other micro-generation projects is to be subject to permitted development rights.

The application of PDRs to projects of this scale ties in with existing rights for farming enterprises and such the UFU has no objection.

In terms of agricultural PDRs in Northern Ireland, the majority of these are replicated in England, however there is one major difference. In Northern Ireland, ground area covered by the AD plant will not exceed 300m squared. Whereas in England, the equivalent figure is 465m squared. According to the planning service, "an AD of a maximum area of 300m squared should be sufficient to install a digester that would be economically viable". With these two differing areas, the Northern Ireland AD sector will be at a competitive disadvantage and will raise doubts over the economic viability of the plants.

Action - The UFU are calling for parity with England and have the maximum area extended to 465m squared. Flexibility of the maximum area is a possibility in Northern Ireland. Back in 2005, as a part of the Farm Nutrient Management Scheme, the Planning Service extended the Maximum from 300m to 600m squared for the construction of slurry storage facilities. Increasing the maximum from 300m

to 465m squared will have many advantages, but most all will increase the likelihood of Northern Ireland achieving its renewable targets and have significant environmental benefit.

In terms of limiting PDRs for AD plants to only material generated on the agricultural unit where the plant is located, the UFU wishes to express its concern. With slurry storage being such a crucial issue at present, an AD plant could provide a crucial outlet for many farmers excess slurry. However, under this proposal, a farmer could not accept a neighbours' slurry. Limiting the type of material makes no commercial sense for an AD plant and any moves to restrict the import of material could effectively tie a producers hands.

Action - The UFU are therefore calling for no restrictions to be placed on the import of material to be used in the AD plant. However, without wishing to appear irresponsible, we accept that any imported material would need to be subject to NIEA Waste Management Licensing agreements.

The UFU welcomes the note that there are no restrictions on PDRs for AD plants in AONBs, National Parks, World Heritage Sites or Conservation Areas. However, we are concerned that the Planning Service are indicating that there will be some restrictions on erecting AD plants in an ASSI.

Action - The UFU would urge that every individual case is taken on its merits and no block restrictions are imposed on AD plants in an ASSI.

If you have any queries please do not hesitate to contact me.

Yours faithfully,

**Chris Osborne
UFU Policy Officer**