

Landscape Institute Northern Ireland

Draft Planning Policy Statement 21: Sustainable Development in the Countryside

Consultation by Planning and Environmental Policy Group, Department of the Environment
Response of the Landscape Institute Northern Ireland branch (LINI), March 2009

Introduction

The Landscape Institute is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Institute's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit. The Landscape Institute is committed to the principles of sustainable development by improving the quality of design of urban and rural environments and to the protection and enhancement of our physical and natural environments.

LINI (Landscape Institute Northern Ireland branch) welcomes the opportunity to submit its views as part of the draft Planning Policy Statement (PPS) 21: Sustainable Development in the Countryside. In response, LINI submits the following general views on the content of the draft PPS in addition to comments relating to specific aspects of the document. LINI hopes the Department will take these into account in its revisions of PPS 21.

General comments

In June 2006, LINI made a response to *draft PPS14: Sustainable Development in the Countryside*, which this draft PPS21 replaces. LINI supported the introduction of *Green Belt / Countryside Policy Area* policies to all areas outside Development Limits in Northern Ireland which draft PPS14 embodied. The introduction of draft PPS21 in November 2008 immediately reversed this position and has removed Green Belt / Countryside Policy Area designation from all areas in Northern Ireland (except for 5 relatively small and concise areas renamed 'Special Countryside Areas'). Furthermore, whilst draft PPS21 states that Countryside Assessments are integral to the Planning System and will enable the designation of new Special Countryside Area in future Development Plans, the Greenbelts and Countryside Policy Areas which have already been carefully delineated and articulated in the development plan system according to Countryside Assessments have however all been eliminated (excepting the 5 renamed as Special Countryside Area). In this evident conflict of intent and action, LINI demands justification of this removal of Green Belt and Countryside Policy Area policies.

Draft PPS21 is a policy for 'sustainable development in the countryside'. The draft PPS21 does not however, state any *objectives for sustainable development*, without which terms such as 'important', 'compelling', 'appropriate' and 'modern living requirements' (etc) are not measurable. LINI believes that the policies in a PPS should not be reactive, but should aspire to an agreed objective for sustainable development in the countryside to be achieved regardless of pressure.

The draft PPS21 refers frequently to *visual* characteristics of design, without stating why these might benefit sustainable development (eg. benefit to economy and health through tourism and well-being), but visual matters alone are not sufficient for sustainable development. Essential qualities of sustainable design also address *location* (reduction of fossil fuels through accessibility and shelter, reduction of flooding aggravation etc), *self-sufficiency* (reduction of travel need for work and food through mixed-use / enterprise, reduction of demand on centralised grid and sewers and instead potential for ecological services and provision of energy to grid), *ecological* well-being (essential to life sustenance) and *heritage* (retention and adaption of built stock minimises energy input in development, use of the landscape for food and resources implicates both lifestyle and landscape value, heritage consideration embodies social understanding of place, community, lifestyle and landscape value). *Sustainable design and good design* are mutually reinforcing. Good design is not just defined by how a building, space or place looks. It is also about whether it is responsive to context, adaptable, uses resources efficiently and delivers value

over its whole life. LINI considers that a proposal addressing and benefiting all of these matters might constitute sustainable development in the countryside, and that the policies of PPS21 do not sufficiently plan for sustainable development.

LINI considers that draft PPS21 includes too many specific examples. The overarching policy in PPS21 should require *all* development in the countryside (ie. inclusive of social and affordable housing, field and development boundaries, visibility splays, gap filling of ribbon development, farm dwellings, other buildings) to demonstrate how it *benefits and enhances a sustainable countryside* (eg. according to the objectives indicated above). There should be no exceptions. There will continue to be building in the countryside. For sustainable development in the countryside these necessary buildings must be appropriately designed. It is not an issue that necessary development will be permitted, and that unnecessary development must be well-designed to be permitted. *All* development which is to be permitted must be appropriately and well designed.

The bullet points below demonstrate the application of the above comments.

- CTY3: LINI believes the statement 'The overall size of the new dwelling should allow it to integrate into the surrounding landscape and would not have a visual impact significantly greater than the existing building' to be too vague, allowing the option to replace a building which already has a significant impact on the landscape with another which is not significantly greater than the original. LINI advises that there should be greater encouragement to remove or mitigate the visual impact of existing structures in the planning process.)
- CTY 3: Reuse and adaption should be take precedence over replacement, but in some cases location for reuse/adaption will not ensure sustainable development unless accompanied by self-sufficiency rather than dependence on centralised services.
- CTY 14: Visibility splays are often responsible for the loss of significant boundaries, hedgerow, trees and landscape structures. The potential impact of this should not be excluded. LINI believes that should a site not be appropriate because of the impact visibility splays could cause then it is not an appropriate site.
- CTY 16: Sustainable development is not solely that which is 'serviced from the centre'. Sustainable development in the countryside may be the complete opposite. Self-sufficiency should be preferred and encouraged.

LINI advises that landscape is a living process which is always undergoing change. The *Northern Ireland Landscape Character Assessment* (2000 ERM) recognises this process in its 130 Landscape Character Areas, which take into account landscape condition, value, and need for enhancement, and inclusion of guidelines for management in terms of development. LINI advises that PPS21 should include a strong emphasis on protection and management of landscape features/boundaries (with an awareness that this management may also include plant replacement). The identification of LCAs has enabled management guidelines for development to be specific to landscape characteristics. The Countryside Assessments advocated by draft PPS21 are based on the Landscape Character Assessment of the NI LCA. LINI therefore advises that for sustainable development in the countryside the policies of PPS21 should respect the NI LCA process. Indeed, LINI recommends that resources are made available to continually review and update it to ensure its currency as the principle guidance source on which sustainable development in the countryside in Northern Ireland should be embedded. The Rural Design Guide for Northern Ireland should also be reviewed and updated to tie into, respond to and reflect these identified Landscape Character Areas. Within the auspices of the document, areas might also be identified where development would be feasible, accompanied with justification of why and how development might be accommodated in such areas.

As professionals, *landscape architects* are able to work with planners to minimise net environmental damage and instead work for net environmental benefit. Landscape architects are well placed to help deliver the science, strategy and designs to achieve improved sustainability. Accordingly, LINI would welcome reference to the recognition and promotion within the policy of the role and value of landscape architects, along with other relevant professionals. LINI requests that the policies of PPS21 enforce that design standards are rigorously tested by a relevant design professional. Specifically, LINI advises that

all rural applications must be submitted with evidence that landscape and visual assessments regarding the siting, layout and design of all proposed elements (including buildings) are undertaken, and that these must be by a qualified landscape architect. (For example, submissions should include a clear demonstration of a positive site selection process, with alternative potential sites explored and assessed for appropriateness). This will immediately identify issues of detriment which are all too often permitted, and require them to be resolved in order for planning permission to be granted. LINI advises that an equally qualified professional within Landscape architects Branch in the Development Control side of Planning Service should be required to check all rural proposals for their landscape impacts. For this consideration, LINI recommends an increase in the staff numbers and capacity of Landscape Architects Branch.

The Landscape Institute Northern Ireland branch would like to thank the Department of the Environment for the opportunity to contribute to the draft PPS21. For any queries and further discussion relating to this response, and for future consultations, please contact:

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