

Draft Addendum to PPS 7: Safeguarding the Character of Established Residential Areas

Comments by

Northern Ireland Environment Link

5 March 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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We welcome the Agency's decision to update its planning policy to safeguard the character of established residential areas, both for new builds and conversions, and to reduce the risk of urban flooding through the increased use of permeable paving. We believe that the proposed changes will make Planning Policy Statement (PPS) 7 more consistent with the stated aim of planning, i.e. sustainable development. Every effort should be made to complement rather than detract from the character of a particular building or setting, particularly when dealing with vernacular buildings and designated sites. It is also vital the natural environment, as well as the built environment, is given appropriate protection to ensure compliance with existing legislation, including the Wildlife Order 1985. This should include ensuring existing nesting/roosting sites of birds and bats are maintained and protected as these are essential for the continued existence of these populations. We would like to see provision in Policy QD1 for the maintenance, and where possible enhancement, of biodiversity in new residential developments.

NIEL believes it is vital that the policy remains flexible enough to permit higher density housing schemes, both in major settlements and, where appropriate, in rural locations. Transport networks must also be considered during the planning process if we are to increase the use of public and active transport and reduce reliance on private vehicles.

Decisions on whether to grant permission should be consistent with the sustainable development criteria and the entire property should meet at least minimum environmental standards. We also welcome the clarification of the definition of brownfield land. NIEL believes it is vitally important that gardens and public green space are protected as they provide environmental, social and health benefits. Section 2.18 should be strengthened to ensure the Agency promotes alternatives to replacing front gardens with car parking, such as reducing the number of private vehicles owned by residents, encouraging use of public and active transport and car sharing. Providing too much parking would act contradictory to the DRD aim of a modal shift from car-use to public and active transport-use (Regional Transportation Strategy). However, government will need to ensure the provision of viable alternatives, especially in rural areas where, quite often, private vehicles are the only way of gaining access to essential public services, such as health care.

The use of permeable paving (Policy LC 3) should be made an essential requirement for all hard surface areas in new developments and upgrades in established developments in order to reduce flood risks.

As mentioned in our response to the previous PPS 7 Addendum consultation, *Quality Residential Environments*, NIEL feels a more comprehensive series of design guides would also benefit Northern Ireland's built environment. Sustainable development should be a central component of all design, but as yet environmental considerations have not been treated as a priority by most homeowners and developers. Further guidance on new planning and building regulation requirements, along with examples of best practice of low and zero carbon design, should be developed and promoted to all those who propose a development.

We thank you for the opportunity to make these comments. We hope you find them helpful and that they will be incorporated in the final Regulations. If you would like to discuss them further, please contact us.