

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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Mr Philip McGowan
Public Consultation
Planning and Natural Resources Division
Department of the Environment
Calvert House
23 Castle Place
Belfast
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Via Email

Dear Mr McGowan

DRAFT ADDENDUM to PPS7 – *Safeguarding the Character of Established Residential Areas*

CNCC welcomes the opportunity to comment on this Draft Addendum. We are a Statutory Advisory Council to the Department of the Environment, with a remit to provide advice on matters relating to nature conservation and the countryside, so that much of this Addendum falls outside of our area of interest and expertise. However, we do have a few points to make that are set out below.

Policy LC1. Recent research, by the Biodiversity in Urban Gardens project at Sheffield University (part-funded by NIEA, and including surveys in Belfast) has given us a much clearer idea of the enormous importance of urban gardens for wildlife. It has even been suggested that gardens now hold a wider diversity of species than most farmland. In view of the proposed Duty to Conserve Biodiversity in the Wildlife and Natural Environment Bill currently being considered by the Northern Ireland Assembly, it would be appropriate to include the protection of biodiversity as a stated aim of the Planning Policy Statement. The Bill states in Paragraph 1 (1) "*It is the duty of every public body, in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions*".

Policy LC3. CNCC supports the Departments efforts to encourage greater use of permeable paving, but feels that they do not go far enough. One of the key elements of the EU Floods Directive is the prevention of floods, which have particularly severe consequences in urban areas. In addition, the Water Framework Directive requires all inland and coastal waters to reach at least 'good status' by 2015.

Most of the watercourses that have been identified as priorities for action flow through urban areas, and action is urgently required to reduce the levels of pollutants entering these waters. It is therefore essential that permeable surfaces that absorb water and slow up its passage into watercourses are not replaced with impermeable materials, as is so often the case when gardens are built over. We believe that the PPS should make SUDS a condition of planning approval in new residential developments rather than merely giving favourable consideration to the use of permeable paving.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick Casement', written over a horizontal line.

PATRICK CASEMENT
CHAIRMAN