

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

CNCC RESPONSE TO DRAFT PLANNING POLICY STATEMENT 14 SUSTAINABLE DEVELOPMENT IN THE COUNTRYSIDE

1. Council welcomes the draft policy, as it reflects many of the points made at the joint meeting of the SACs in June 2003, in the subsequent correspondence and also set out in the Seventh Report of CNCC published in May 2006.
2. The provisions of the Draft PPS14 if carried through will provide significant “treatment” for what we described in our Seventh Report as, “the acne of highly visible single dwellings that is spreading inexorably across the face of our landscape”. The medication will taste unpalatable in certain areas, and the cure will need time to have effect, given the expectations raised by the previous “presumption in favour of development” and the significant backlog of planning applications awaiting decision (22,145 -March 05, an increase from 16,875 at March 04).
3. CNCC members have attended many of the public meetings arranged by the Department to facilitate public consultation. In addition Council has been represented at other events organised to discuss the Draft PPS. Council is therefore aware of many of the concerns raised by the public.
4. Council was heartened by the number of those who expressed agreement that too many houses were being built in the “wrong” places in the countryside. Also there seemed to be a consensus that stronger application of design and siting guidance would be appropriate. However Council considers that it is crucial to distinguish among the often mixed views expressed those which are directly impacted by the proposals and those where other non-environmental and social forces are at work in rural society. Many contributors commented about the perceived (and actual?) decline in rural communities, arguing that the provision of additional housing is essential to community continuance and regeneration. Council considers that the wider social and economic changes in modern society are such that only in extremely few and limited circumstances would the declines in school rolls, closure of rural shops, post offices, surgeries and decline in farm incomes be ameliorated by provision of additional housing in rural locations. Services such as education, retailing and health depend upon concentration to enable provision of modern standards at economic and efficient levels, thus increasingly forcing these essentials into the settlements. Council takes the view that changing social structures with smaller families and households with the associated increase in houses are factors which affect all of Northern Ireland society, not solely the rural communities.
5. The increased need for housing driven by these societal changes will inevitably impact on the rural community, but Council strongly agree with view expressed in the “Housing Growth Indicators” Consultation Paper, published in January 2005. “These high rates of (rural) approval are unsustainable in the longer term if, RDS objectives to build more housing within urban areas is to be achieved” (para.5.12). It will however be essential to ensure that the associated RDS objective of 10 per cent over zoning to accommodate changes in availability and demand for housing land is met, particularly in the smaller towns and settlements, to accommodate the demand which is likely displaced by the implementation of PPS14. Appendix 2 from PPS12 , “Housing in Settlements” states:

“It is important to ensure that, regardless of the review mechanism employed, there will be a continuous housing land supply sufficient to meeting prevailing housing needs.”

6. We believe this will require more flexibility in zoning within the smaller settlements to accommodate the current demand for housing displaced by PPS14 in the current climate of increasing un-affordability in NI.
7. We consider the comment in paragraph 4.50: "Replacement of tenanted Dwelling Houses", is factually incorrect. The majority of tenanted dwellings in Northern Ireland to-day are not subject to rent control. Possession can be obtained at the end of a lease period. The comments also do not sit comfortably with the current housing policy approach of looking to the private rented sector to provide for a proportion of the need for low income housing.
8. Council has concerns about the interaction between DARD policies and procedures for assessing Farm viability and their interaction with Planning Service requirements. Council recognises the problems implicit in continuing with a "farm viability test" and subject to further discussion with Planning Service and DARD, Council "is of the opinion" that agricultural need should be considered on the basis of "strict planning criteria "relating to existing buildings.
9. A presumption against development in Greenbelts and CPA's will not, (contrary to media reports and public perceptions), mean a blanket ban on building in the countryside. Figures from Planning Service show that over the year 2004/5 Applications for new dwellings within Greenbelt/CPA's had a 62 per cent approval rate rising to 90 per cent for replacement dwellings albeit from a lower base figure. There has always been a presumption against development in the greenbelts and CPA's yet the building rate is significant, suggesting that the policy proposed far from stifling new development will result in significant continuing development within the countryside.
10. CNCC is concerned about the contributions septic tanks make to increasing diffuse pollution loadings leading to eutrophication. 12 percent and 14 percent of Phosphate loadings in Lough Erne and Lough Neagh respectively, have been attributed to septic tanks. Council therefore welcomes the proposal in "CTY 14 Development relying on non mains Sewerage". 17 per cent of Northern Ireland is on septic tanks as opposed to 4 per cent in GB on average. We take the view that the current administrative arrangements for the approval, provision, monitoring and operation of septic tanks are also inadequate. For the new policy to achieve its objectives, these arrangements will also require improvement. Northern Ireland has a commitment under the Water Framework Directive to achieve good ecological status in all its surface and ground waters by 2015. The proliferation of septic tanks without adequate controls may put such an achievement at risk and incur large fines from Europe.
11. The rural nature of much of Northern Ireland is a major asset and offers significant economic opportunities in the field of Sustainable Tourism. Recent research from Scotland indicates that the landscape is one of the most valued features with over 90 of visitors coming to Scotland for scenery and natural environment; generating a tourist spend into the economy of £4.5 billion.
12. Sperrin Tourism located in one of Northern Ireland's economically deprived areas recently announced a 25 per cent increase in tourist figures of bed occupancy and a tourist spend of £3.4 million. This small example is indicative of the potential across the province, provided we can maintain our unique landscape heritage. The example from our near neighbour in Donegal, where over -development of rural areas is attracting adverse publicity is to be avoided if we are to build on the opportunities offered by our countryside.
13. Council regrets the omission in the Draft PPS of any mention of the role "Protected Landscapes" can and should play in any Sustainable Development Policy for the Countryside.

The lack of consistent formal recognition of the AONB designation in Planning Policy is a contributory factor in the degradation of several of these protected areas. The Mourne example, where inappropriate and spreading development in one of Northern Ireland's iconic landscapes, within an AONB, has resulted in a significant area being identified as no longer appropriate for inclusion within the suggested boundary of the proposed Mourne National Park, is a symptom of major (spectacular) failure of the planning system to protect those landscapes which have Statutory landscape designations.

14. Council remains concerned that the proposed policy still does not adequately recognise the problems of cumulative development within the landscape. While the overall curb on development is welcomed there is no specific measure to deal with the next house or development which will be the "tipping point" to fundamentally change the character of the landscape. In this regard it would be possible to expand Policy CTY 11 - Rural Character, to include more specific reference to the impact a proposed development will have on the local Landscape Character by changing CTY11(e) to read "the impact of development would damage the rural landscape character".
15. As a final comment, CNCC would emphasise the importance of the "Precautionary Principle" when faced with the current explosion of demand for housing in the countryside. It is patently unsustainable to continue with the current trends. They are driven by many causes, affordability, low farm incomes, ease of transport among the main factors. However, these are all subject to variation over time which may change in future. If climate change brings improved agricultural advantage to Northern Ireland in years to come, will we be able to reap the advantage if we continue to build in excess of 8000 houses per annum (the size of a major Northern Ireland town) in our open countryside? If personal transport costs continue to increase ahead of other prices will the current new houses join the abandoned homesteads from the nineteenth and early twentieth centuries, which dot our countryside?
16. Council considers that PPS 14 offers the potential for a more sustainable future for the countryside than the current wave of suburbanisation. To do nothing will be a disaster. To go ahead will provide a framework for Sustainable Development in our countryside.

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