



Response to *Draft PPS21: Sustainable Development in the Countryside*

Introduction

The Campaign for the Protection Countryside Northern Ireland welcomes the opportunity to respond to this consultation on Draft PPS21.

At the outset, we should state that we would support the paper submitted to the Department by Environment Link NI in response to the same.

Main points

1. The Campaign was broadly in favour of PPS14 and had presented at meetings the Campaign's views to the Minister of the Environment's predecessor, Ms Arlene Foster and to the Minister for Regional Development, Mr Connor Murphy who originally had responsibility for this policy area.
2. We are concerned at the removal of the "Presumption against development", which had been a main plank of PPS14, but is not replicated in so many words in PPS21. The new paragraph, CTY1 in PPS21, is diluted from that in PPS14, in that it states that a range of development will be acceptable in the countryside. In the next paragraph of the policy, an attempt is made to reimpose the presumption against other development in the countryside, but it falls short of stating that there will be a presumption against any such development. We can see why the presumption had to go for the range of acceptable developments in the first paragraph but would like to see "the presumption against" wording used in paragraphs 2&3
3. We concur with all the points 5.1- 5.11 in the Justification and Amplification section of CTY1.
4. We welcome the introduction in PPS21 of Policy CTY2, Development in Dispersed Rural Communities. However we would want to be satisfied that these DCLs are genuine and that all criteria listed must be satisfied before new areas are so designated. This will enable country dwellers to find affordable homes in their own areas. So much of the housing being built in the countryside is quite out of the financial range of young people and people working in the country. This is particularly so in a commuting range of Belfast and other centres of employment. We also welcome CTY 5, which allows a housing association to develop clachans of up to 14 dwellings, adjacent or near to a small settlement in a designated area. The designated area will be revealed in the Area Plans. We believe this to be a good way of obtaining a new supply of affordable housing in the country.
5. CTY3 Replacement Dwellings. We appreciate that this will dispose of the somewhat artificial test posed before PPS14; was the house the subject of the replacement application recently occupied? The policy also states that the replacement house should, if possible, be

within the curtilage of the dwelling being replaced. There are rules about size and design of replacements which we welcome. The proposal to allow redundant non-residential buildings to be replaced with a single dwelling house will also allow extra houses to be constructed without blighting unused areas. We agree with the proposals in CTY4 and would like to see encouragement given to the conversion of suitable non-residential buildings, eg old barns, rather than replacement, if that can be done. This is also stated in CTY3 in relation to non-listed dwellings and we strongly approve of the paragraph in CTY3, titled "Non-listed Vernacular Dwellings".

6. We are very much less happy with the policy CTY6, Personal and Domestic Circumstances. There have been many examples in the past of this type of planning justification being abused. It also brings in so many non planning considerations and opens up the whole debate to non planning and emotive arguments. We agree that it is reasonable to include in the justifications, the consideration of a temporary building such as a mobile home, which could be reviewed by the Planning Authority every 10 years or so.

7. CTY8 which deals with Ribbon Development is welcome as this is another area that has become noticeable in the countryside in recent years, with some roads resembling suburban areas. This policy will have to be well policed as there are some roads in the countryside, for instance around Dromore and Lisburn, to name but two areas, where there is already a continuous ribbon and no infilling should be allowed.

8. One of the major new features of PPS21 is CTY10. The Campaign was happy with PPS14 on this matter of Dwellings on Farms. We did understand the view of the Farming community, which does require some leeway for development to allow family members and others required for the farming enterprise, to be able to live near the farm. We also understand the historic links between the farm land and the families who were reared on it and wish to live there. However, the situation was abused by the wholesale development of farm land for dwellings for people who had no such historic or working connection with the land being developed and the result was the proliferation of houses on farm land, which were not built in a sympathetic way to the areas where they were sited, or were sited in prominent positions, to the detriment of the countryside.

We are content that, provided that this new policy is implemented and enforced strictly, that it will be an improvement on the pre PPS14 situation. We understand that the old occupancy conditions will no longer be applied. We understand that they were hard to police and led to endless requests for their removal.

9. Policy CTY13 is also welcome as it lays down requirements that we would advocate. We feel that there have been too many inappropriate houses built in sensitive areas. The sighting and design of houses is very important in the particular landscape and field pattern of Northern Ireland. We welcome the reference to keeping trees 5.57 and design 5.60.

10. Again we welcome the provisions of CTY14. The policy if fully enforced should have a very good impact on the Northern Ireland landscape. Likewise CTY15 is a policy that we would fully support and should, when read with CTY5, assist the planners in allowing some development in suitable rural communities.

Patrick Cross
Chairman
The Campaign for the Protection of the Countryside NI
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