

Landscape Institute Northern Ireland

Building on Tradition – a sustainable design guide for the NI Countryside: draft Supplementary Planning Guidance (SPG) to PPS 21.

Public Consultation by Department of Environment (DOE).

Response of the **Landscape Institute Northern Ireland branch** (LINI).

8 July 2011

The Landscape Institute is the chartered institute in the United Kingdom for landscape architects, incorporating designers, managers, and scientists, concerned with conserving and enhancing the environment. The Landscape Institute promotes the highest standards in the practice of landscape planning, design, management and research, and represents members in private practice, at all levels of government and government agencies, in academic institutions and in commercial organisations.

The Landscape Institute is an educational charity and chartered body whose purpose is to protect, conserve and enhance the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Landscape 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.

The Landscape Institute Northern Ireland branch (LINI) represents the professional membership within Northern Ireland and is particularly concerned with design, management and planning for the protection, conservation and enhancement of the natural and built environment of Northern Ireland.

LINI welcomes the opportunity to consider the 'Building on Tradition – a sustainable design guide for the NI Countryside' Consultation Document, and submits the following response.

1: Title and Structure

The primary purpose of this document states that it is to provide a guide to assist those involved with 'sustainable' development in the Northern Ireland countryside, and to clarify the requirements of PPS21 ' Sustainable Development in the Countryside'

It is in effect a 'design guide' for proposed development in the countryside, with a primary focus on the integration, placement, setting, design and finish of development.

Whilst these issues are obviously critical considerations for any proposed development in the countryside, these matters do not address true sustainability. The LINI therefore consider that the document title 'A Sustainable Design Guide for the Northern Ireland Countryside' is currently inaccurate and indeed could be somewhat misleading without greater illustration and discussion of sustainable matters

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The term 'Sustainable' should be removed from the title and used significantly less throughout the document, being applied only where truly sustainable issues are being discussed.

The document suggested it has been prepared to address building and development in the countryside, however it fails to address anything other than proposed residential development in the countryside.

As with the 'Cork Rural Design Guide: Building a New House in the Countryside' by the same author, it should be emphasized that this document does not cover whether a proposed house is permissible in a particular area of the country or in what circumstances.

It should also be clarified this document like the Cork Design Guide does not specifically deal with development other than houses in rural areas.

In conclusion a more accurate and realistic title for the current composition of this document would be 'Building on Tradition – A Design Guide for Housing in the Northern Ireland Countryside'

2. Focus and Content:

LINI requests that the first position of this reference guide should be to educate those using it on the accurate meaning and importance of 'Sustainability' and to actually question the purpose of additional building in the countryside which is ultimately a finite resource.

A Glossary of terms and definitions should be included followed by a user questionnaire designed to encourage readers/developers to first consider their need / desire to build in the countryside, to understand and apply fundamental principles of sustainable living.

Questions should include:

- 1 Will the occupier be able to earn a livelihood from the countryside itself?
- or
- 2 Will the occupier need to travel / commute to earn a livelihood?
- 3 How far will the occupier be from their place of work, from schools, from shops, from services such as healthcare, recreation centres, religious centres etc.
- 4 How often will journeys be made to each of the above and how would they be reached. ie Private car, walking, cycling, bus etc.
- 5 Has the occupier considered distance / response time of emergency services to potentially remote locations.
- 6 Will the occupier use the land around the building for food production?
- 7 Will the occupier use the land around the building for habitat creation?
- 8 Will the occupier generate own power?

These items should be set out in a manner which allows both proposed developer and planners to reach conclusion regarding sustainability and appropriateness.

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3. Themes:

The guide follows the themes / headings set out by PPS21:

Introduction	-	Chapter 1
Our Place	-	Chapter 2
Reuse	-	Chapter 3
Visual Integrated	-	Chapter 4
Replacement	-	Chapter 5
New Build	-	Chapter 6
Building on Tradition	-	Chapter 7

The order of the chapters may need to be reviewed for clarity. LINI suggest it may be more logical to restructure as follows:

Introduction	-	Chapter 1
Our Place	-	Chapter 2
Building on Tradition	-	Chapter 3
Visual Integrated	-	Chapter 4
Reuse	-	Chapter 5
Replacement	-	Chapter 6
New Build	-	Chapter 7

With more emphasis given to the principles set out Building on Tradition and the importance of Visual Integration as overarching principles for all buildings, weather reused, replaced or new build.

Further the document appears to place a hierarchy on Reuse over Replacement, over New Build. This structure is welcome and should indeed be reinforced within this document and PPS21, with new building being highlighted as the least favourable / least sustainable option.

4. Chapters:

Chapter 2 Our Place

LINI agree that it is appropriate to place this chapter at the beginning to emphasis the value and importance of our landscapes.

However, LINI feel that this is an over simplification of the Landscape Character Areas.

The Character Areas illustrated within this document do not accord with the Northern Ireland Landscape Character Assessment (NILCA) 2000 main document.

Whilst there are a total of 130 character areas, the NILCA 2000 document uses six broad landscape character areas within NI.

These are as follows:-

1. The Antrim Plateau
2. The North West

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3. Fermanagh
4. Lough Neagh Basin
5. The Mourne & South Armagh
6. Down

These are described in pages 29-46 in the document and are readily understood. They are geographically recognisable.

However the SPG suggests 5 broad landscape character areas as follows:-

1. The North West
2. The Antrim Plateau
3. The Uplands of the South East
4. The Drumlin Belt
5. Eastern & Western Lowlands

The first two character areas accord exactly with the NILCA 2000 document. However the remaining three are, we believe, ambiguous and could lead to confusion.

This is compounded by the presence of a 'Character Map' of NI (see page 22) which doesn't clearly define where each landscape area is located. It appears to show the location of broad landscape features in NI as opposed to the 5 defined character areas. In short we consider that the Department should not depart from the published policy document, one which has been tried and tested through both the planning appeals and public inquiry process. Both documents should tie-in seamlessly with each other.

The chapter is titled 'our place - what makes it special?', but apart from characteristics of visual and physical form appears unconcerned with what might keep the countryside character areas mentioned special.

This document purports to be a sustainable design guide for the Northern Ireland countryside. However, there is no discussion regarding what it means to live or build in the countryside in terms of a responsibility to keep 'our place' special by adopting a lifestyle which is appropriate to its resources and wellbeing (albeit that this concept is mentioned later in the document, when it is stated that 'sustainability is about being able to adapt to the environment' (3.4, p50)).

The European Landscape Convention (ELC), to which the DOE is obliged to adhere, states that all landscapes matter. The ELC requires that once all landscapes and their characteristics are recognised, vision objectives should be established to enhance these landscapes accordingly, and procedures put in place to meet these vision objectives. In this case, where the landscapes contain rural development and it is the lifestyle and resources together which have created and will sustain those landscapes, it is essential that anyone developing in the countryside accepts responsibility for respecting the value of their landscape character area through their development. ie that the embodied lifestyle of the proposed development takes responsibility for its impact on value of the landscape of its location.

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There is a very incomplete and inadequate mention of the importance of the consideration of resources in terms of development in the countryside (water and biodiversity), which similar to the discussion on landscape character areas is inconsistent and misleading.

LINI feel that it is important to be clear to readers, that there are sensitive landscapes which have limited and indeed some have no capacity to accommodate development.

The guide appears very pro development, attempting to offer solutions to every context.

Critically the matter of Cumulative Impact and landscape capacity have not been discussed.

Although the document illustrated many useful ways for buildings to be visually integrated into the landscape. Ultimately continued building will result in landscape capacities being reached and negative impacts occurring to these landscape characters.

Landscape is a finite resource and the guide and PPS should make it very clear that, in some instances building should not happen.

Chapter 3 Re-Use

LINI identify inherent problems when the Design Guide seeks to place a hierarchy on the policies of PPS21, or to define some of the ambiguous ill-defined terms of the policy (eg. 'important'). The Guide presents 'reuse', followed by 'visually integrated', followed by 'replacement', followed by 'new build', and finally 'building on tradition'.

The structure of the guide loses the overarching nature of some of its phrases: for instance, the guide states that 'accommodating modern living space requirements and meeting sustainable design standards are the critical design challenges for traditional buildings (3.7.5).

It is the case that these are the critical design challenges for all buildings.

Chapter 4 Visual Integration

LINI welcome the emphasis being placed on visual integration and accept all key matters within this chapter.

However there are a number of critical omissions:

Most examples of visual integration rely on retention of existing planting and augmentation with new planting. There appears to be no inclusion within the guide regarding the long term maintenance and management of planting to ensuring ongoing visual integration from planting.

There appears to be no mechanism which might discourage / prevent people from clearing vegetation post permission.

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This issue has been a failing in the past, and it is recommended that all existing vegetation be accurately surveyed as part of any application and properly protected during building as per British Standard 5837: 2005 'Trees in relation to construction.

Further it should be made clear within the guide that planning authorities can place a TPO – Tree Preservation Order on important trees associated with a site.

- 1 An appendix of appropriate native species should be included.
- 2 An example of tree protection measures should be included.
- 3 Clarification what the document is referring to when discussing the use of hedges around properties as there is a significant difference between clipped hedges and hedgerows.
- 4 Lighting can have a significant visual impact. This need to be discussed and considered.
- 5 Further, seasonal variation vegetation has a very considerable effect on our landscapes, with built structures generally becoming much more visible in winter months, this matter need to be discussed and considered.

Also it is suggested that proposed woodlands (even if small community woodlands) should be consider as part of application within some dispersed settlements.

Sustainable development is not a visual matter alone, and LINI is extremely concerned that 'visual' matters are being promoted without parallel and overarching consideration of matters of design regarding sustainable development of the system which is the countryside. This would include discussion of site selection and design practice which will minimise the need for servicing and maximise the benefit to the resources of the countryside, alongside visual and physical considerations.

Whilst the NILCA is mentioned (4.2.0), there is no inference as to how this might influence the design of development in the countryside.

Relating to the siting of proposals, some of the options demonstrated are very restrictive in terms of space and overlooking.

Those living or building in the countryside will be required to respect the responsibilities of sustainable rural lifestyle. eg. that 'modern' living requirements (big and wide gabled homes with cars and garages (4.6.3)) will have to be different. The Guide does not attempt to suggest how the adhoc nature of clachan layout (lack of defined spatial and privacy boundaries and ownership) might alter the lifestyle expectations of those wishing to develop in the countryside.

The Guide does not at any point suggest or promote the alternatives to 'cars and garages' (through consideration of distance to services / schools / shops, public transport, food etc).

The diagram on Page 84 – illustrates 6 options for development associated with an existing farm and farm cluster, however this could easily be misunderstood as

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an illustration how 6 different building sites could be accommodated on a single farm.

Chapter 5: Replacement

Replacement is justified by the Guide as a means to retain existing rural settlement patterns (including services and landscape features) (5.1.0). LINI supports this explanation of replacement where reuse is not possible relating to inconsistency between the hierarchy of the Guide and the policy, and LINI request that the PPS is amended to reflect the Department's acceptance of policy hierarchy).

Chapter 6: New build:

The Guide does not appear to illustrate examples of houses or buildings which fully fit with the sustainability agenda (except potentially in photo images which are not annotated to explain what aspects of the buildings shown make it a sustainable example).

If images are to be beneficial, they should be annotated fully and supported by diagrams explaining their sustainable credentials.

The contents of the list of 'things you may need' (p106) is poorly justified.

LINI feel this list would be better titled 'essential matters to consider in all cases'.

To avoid appearing as a preference of taste, every matter in the list needs to be justified as to why these are important for sustainable development in the countryside (eg. it is difficult to justify how 'car parked round the back' has any impact on sustainable development in the countryside; similarly 'facing the wrong way' requires an explanation of what might constitute facing the right way in order to be understood; also no sustainable design justification is provided to 6.3.2 bullet points 4&5, and the bullet points of p113). The contents of the list are insufficiently explained by the diagrams (pp108-9). The Cork Design Guide (authored by the consultants and to which they were asked to refer) lists 20 things that must be considered for all development. This list includes matters such as distance to / accessibility of school, shops, bus, food, water.

The LINI request that the consultants include these matters in this list of 'essentials'.

If amended and improved, this list of crucial considerations for all development should be relocated to the start of the document.

It does not seem accurate to infer that the landscape of Antrim wraps itself less around buildings than the landscapes of the rest of Northern Ireland (6.3.1).

No visibility splays are indicated on the new entrance of the new build proposal of p112, and welcomes this evidence of relaxation of DRD's practice for these detractors to rural character.

Chapter 7: Building on Tradition:

Relating to the design process, LINI requests that 'and the wellbeing of the rural environment' is inserted after 'needs of the client' (7.2.0)

Also an additional stage is needed between Stage 1 and 2 (p119), namely

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'Select Your Site'. This Stage must include a checklist (akin to Cork Design Guide's '20 things that every development should consider') to assess whether or not the correct site is being selected for the proposal. This Stage should also include how a design might evolve to benefit some of these issues.

Stage 2 refers to 'houses' whereas it must apply to all buildings. This Stage must mention the NILCA and how it should be used to guide design on a selected site. Stage 4 concentrates only on visual matters.

This Stage must also consider core sustainability matters. It must say in this Stage: 'apply the sustainable environment checklist'.

The 'sustainable environment checklist' must come at the start of the Guide, and it should also deal with site selection (as per the Cork Design Guide '20 points to consider').

Matters of Resource Efficiency in terms of Waste and Materials, and Biodiversity, are not 'new technologies' but rather reflect 'the way it used to be done' (p126-7). This part should explain what SuDS is, and the guide should provide diagrammatic examples of how this can guide and influence sustainable development (eg. Landscape, Journal of the Landscape Institute, Summer 2009). There should be reference to the concept of Ecosystem Services, where the resources of the countryside are identified and their value recognised, to guide each development proposal accordingly to aim by the development to increase the value of the identified resources. There should be statement relating to light pollution, and guidance stating that light pollution must be avoided and the provision of lights visible externally avoided where possible.

Relating to bullet 11 p134, and bullet 7 p136, LINI requests rewording to encompass accessibility through all means of transport.

Design Statements must be written specifically for the application in question (7.5.3), and would remove bullet points 1&2 (7.5.3).

The lists p133-135 should be amalgamated and consistent, as they are nearly repetitive which causes confusion.

This list should read:

- 1 Site selection and alternative, and analysis of these alternatives, including sustainable criteria which justify selection of site, and including consideration of the necessary services and their impact
- 2 Survey of attributes of site (remove reference to enclosure above all other considerations)
- 3 Alternative design options
- 4 Environmental attributes of site and surrounding area, and measures taken to protect and enhance these areas and enhance the wellbeing of the countryside.
- 5 Report on landscape character which the site is located to clearly demonstrate understanding of the landscapes sensitivities and assessment of how any proposals would fit into character area without eroding it. Put simply does the design demonstrate regard for

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- 6 local distinctiveness and the rural setting
- 6 Rationale for building and site design, and proposals for the sustainable wellbeing of the countryside. (It is important to note that many of these aspects of design do not relate to the building per se: Site design is integral with sustainable building design).
- 7 Impact on critical views, and consideration of cumulative impact
- 8 Explanation of how the strategic requirements of building and site design are met through detail.

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

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