

NIPSA would make the following comments in relation to the consultation documents listed above:

1.0 Householder

- 1.1 We would express some concern at the scale of extension being allowed up to 50% of the curtilage covered as this, in our opinion, has the potential for a detrimental impact on the existing amenity, streetscape and landscape of an area by creating an unsatisfactory relationship between built form and open space.
- 1.2 We would express concern that it is not proposed to introduce restrictions on porches in Conservation Areas, as these have the potential to create an adverse impact on the existing streetscape character of an area.
- 1.3 For the same reasons outlined in point 1.1 we would have concerns regarding the intention to allow new buildings up to 50% of the curtilage covered.
- 1.4 We would express concern at the intention to allow Permitted Development Rights for extensions and outbuildings within areas designated for their landscape character, as these areas are the most sensitive in terms of the landscape and visual impact of built form.
- 1.5 We welcome the intention to restrict hard surfacing to the front of dwellings to porous materials, as in addition to minimising the risk of flooding this will also assist in the provision of water to existing mature trees and vegetation. It is, however, our understanding that at present hard surfacing can be replaced within a relatively short timescale with less environmentally- friendly materials and we ask if mechanisms to prevent this can be considered.
- 1.6 We would also highlight the fact that Permitted Development Rights for hard surfacing to the front of dwellings has, unless restricted, the potential to create an adverse impact on the existing streetscape and landscape character of an area by, for example, replacing mature gardens with extensive areas of parking.
- 1.7 We would advise that Permitted Development Rights for Minor Works should be restricted in areas designated for their landscape character, e.g. AONBs, in order to avoid the detrimental impact of inappropriate boundary treatments, etc. within these sensitive areas.
- 1.8 One of stated aims of the householder permitted development review is to "ensure that householder developments do not give rise to adverse environmental impacts". This, however, is subjective and we ask who will determine or gauge the degree of adverse environmental impact.
- 1.9 A major concern that we have with the proposals is that they fail to address the retention and protection of mature trees. Permitted Development Rights have the potential to result in the loss of large numbers of mature trees, with a corresponding detrimental impact on the existing streetscape and landscape.