



Department of the
Environment

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**BUILDING ON TRADITION - A SUSTAINABLE DESIGN
GUIDE FOR THE NORTHERN IRELAND COUNTRYSIDE**

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SYNOPSIS OF CONSULTATION RESPONSES

May 2012

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Introduction

1. On 24th March 2011, the Department issued for public consultation draft supplementary planning guidance: Building in Tradition – A Sustainable Design Guide for the Northern Ireland Countryside.
2. As part of the consultation process copies of the draft design guide were distributed to approximately 350 interested parties, including all Assembly Members; all 26 District Councils, Government Departments and external stakeholders. Notice of the publication of the draft design guide and the commencement of the consultation period was given in the Irish News, Newsletter and Belfast Telegraph on 25th March 2011. The document was also made available on the Planning NI website. Consultation responses were requested by 8th July 2011. All the responses received will be taken into account by the Department in finalising the document.
3. This paper provides a general overview of the main findings of the public consultation exercise. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues and main recommendations raised in the responses.
4. The Department would take this opportunity to thank all those who contributed to the consultation exercise.
5. A list of all the respondents who responded to the public consultation is provided at **Annex 1**.

Overview of Consultation

6. The Department received a total of 26 responses to the public consultation (and 2 Nil responses). These can be broken down into the following categories:

Category of Respondent	No.	%
(a) Public Bodies	3	11.5
(b) Local Government (Including NILGA)	6	23.0
(c) Architects/Professional	8	31.0
(d) Environment & Heritage Group	4	15.5
(e) Individual	1	3.8
(f) Emergency Service	1	3.8
(g) Community / Voluntary	1	3.8
(h) Professional Bodies	1	3.8
(l) Advisory Bodies	1	3.8
Total	26	100

7. Overall the majority of respondents (20 or 71%) expressed broad support for the draft guidance document.
8. 3 out of 26 respondents (or 11.5%) expressed general opposition to the draft guidance document. However one of those did acknowledge that the document's broad view of design is encouraging for applicants and agents alike.
9. The opinion of the remaining 3 respondents (11.5%) is not so clear cut in that comments relate to issues outside of the scope of the draft guidance document.
10. All of the responses received to the public consultation are available to view or download from the Planning NI website www.planningni.gov.uk.

Key Issues Emerging from Responses

Support

11. There was significant support for the draft guidance document either in its entirety or in relation to specific sections. However, a notable quantity of respondents have made suggestions where the policy could be improved – these specific Issues are set out below:

General

12. A small number of respondents (including McNeil Architectural consultancy; Andrew Hamilton Building Contractors; Hamilton Architects; Johnston Stirling Partnership; and Adams Ltd Architects) have stated that photographs contained within the draft document should not reference individual architects as this could be seen as Government endorsement of one practice over another. Furthermore, another group (Including some of the aforementioned respondents)

have noted that the guide should not promote the use of architects over other professional bodies.

13. Another group of respondents (including McNeil Architectural Consultancy; NILGA, Newtownabbey Borough Council; MAG; the National Trust; Johnston Stirling Partnership; UFU; Sinead King; NIEL; and RSUA) have requested that consideration should be given to amending PPS 21 'Sustainable Development in the Countryside' such as: Amending the text; setting out areas where no development in the countryside is appropriate; increased robustness; more prescriptive; and inclusion of mandatory requirements such as DARD business numbers.
14. The Ministerial Advisory Group (MAG) listed a number of general points including too much promotion on 'reuse' above 'replacement'; a bias towards housing as opposed to other forms of development in the countryside; no requirement for sustainable development to adhere to the principles of rural design; and a lack of clarification as to whether the provisions of this document or 'Creating Places' will prevail in locations on the periphery of a settlement.
15. A small number of other less fundamental points were raised by individual respondents such as presentational issues; requests for the inclusion of more technical guidance; and requests to depict bad examples, as well as good.

1.0 Introduction

16. NIEL highlight the importance of a consistent approach to sustainable development within the introduction, whilst RSUA have noted that a small number of examples are from outside Northern Ireland.

2.0 Our Place – What Makes It Special

17. A number of respondents (including Newry and Mourne District Council; Causeway Coast and Glens Heritage Trust; NIEL and MAG) have requested that there is greater emphasis on Environmental Protection such as establishing management bodies for each AONB to consult on all applications; encouraging the use of the six original LCA areas from the NI Landscape Character Assessment (2000); and reference to other designations (E.g. ASSI's).
18. A small number of other points were raised by individual respondents, including, McNeil Architectural Consultancy who consider the section on towns and villages to be irrelevant given that it does not form part of PPS 21; and NIEL suggest that a contextual approach to settlement patterns should be encouraged.
19. The Ministerial Advisory Group (MAG) have listed a number of points relating to this chapter, including the suggestion that it should be more robust - as it is currently presented as primarily aesthetic and spatial rather than an evolution of natural environment and human lifestyle. MAG also considers the commentary on the importance of water and

biodiversity resources to be insufficiently informed and misleading; and suggests (together with NIEL) that this chapter should emphasise the need to develop a lifestyle appropriate to resources and wellbeing of the countryside.

3.0 Reuse

20. The Ministerial Advisory Group (MAG) makes a small number of points relating to this chapter, including the view that it could provide more guidance on restoring and enhancing and existing building and that it implies 'accommodating modern living space requirements and meeting sustainable design standards' (3.7.5) as critical design challenges for traditional buildings only.
21. A small number of other points were raised by individual respondents, including RSPB who consider that the retention of biodiversity should be considered when retrofitting. NIEL suggest the inclusion of life costing examples and the National Trust suggest the term significance is further elaborated to help reader understand.

4.0 Visually integrated

22. The Ministerial Advisory Group (MAG) again makes a small number of points relating to this chapter, including; the suggestion that the term 'Visual integration' be replaced by 'Sustainable Rural Integration' which would incorporate transport / services / environmental resources alongside visual integration; that matter contained in this chapter are pertinent to all development in the countryside and should be stated at the outset of the document; and that an acceptable gap in relation to ribbon development is clearly defined.
23. A number of other points were raised by individual respondents, including Sinead King – who considers that there should be more innovation relating to building forms. The Causeway Coast and Glens Heritage Trust consider that further information on local biodiversity should be included. NIEL consider a need for further information on environmental degradation and impact on the natural environment. UFU consider there to be too much focus on clustering and not enough guidance on visual integration. The National Trust suggests that 'avoid' should be substituted with 'do not use' in the use of suburban features; and Newtownabbey Borough Council state that visually linking must have a scale based on physical linking.

5.0 Replacement

24. Notable comments were made on this chapter by two individual respondents: The Ministerial Advisory Group (MAG) considers the term replacement to be ill-defined in this context; that 'basic rules' for replacement projects set out in the design guide differ from the policy in PPS 21; and that the examples set out in pages 96-101 relate primarily

to form and 'taste' rather than justifiable matters of sustainable development.

25. McNeil Architectural Consultancy cautions the use of replacement, citing renovations as being cost prohibitive due to VAT.

6.0 New Build

26. A small number of respondents including the Ministerial Advisory Group (MAG) and RSUA suggested some minor rewording for the purposes of qualifying the intent of its content. Whilst RSPB and NIEL wish to see promotion of low / zero carbon homes.

7.0 Building on Tradition

27. The Ministerial Advisory Group (MAG) has made a number of points relating to this chapter, including concern regarding the four stage design process - in terms of wording and the omission of the Landscape Character Assessment NI and Core sustainability matters; together with a number of other suggested text and format amendments in this chapter.
28. CNCC note a lack of advice on obtaining an appropriate agent / architect to handle an application and that the guide would benefit from a flow chart outlining the planning process. Whilst the RSUA have made a number of suggested text amendments primarily relating to Renewable energy / Sustainable Construction.
29. A small number of other points were raised by individual respondents requesting that the section on biodiversity is expanded.

Appendices

30. Regarding the appendices RSPB have commented that more information on sustainable building techniques is required.

Annex 1

Respondents to Public Consultation

Adams Limited Architects
Andrew Hamilton Building Contractors
Ards Borough Council
Castlereagh Borough Council
Causeway Coast and Glens Heritage Trust
Council for Nature Conservation and Countryside (CNCC)
Fermanagh District Council
Hamilton Architects
Jane Burnside
Johnston Stirling Partnership
McNeil Architectural Consultancy (M.A.C)
Ministerial Advisory Group (MAG)
Mourne Heritage Trust
Newry and Mourne District Council
Newtownabbey Borough Council
Northern Ireland Environment Link (NIEL)
Northern Ireland Fire and Rescue Service (NIFRS)
Northern Ireland Housing Executive (NIHE)
Northern Ireland Judicial Appointments Commission
Northern Ireland Local Government Association (NILGA)
Patrick Bradley
Royal Society for the Protection of Birds (RSPB)
Royal Society of Ulster Architects (RSUA)
Sinead King
The National Trust
Theatres Trust
Ulster Farmers Union (UFU)
White Ink Architects