

Mike Thompson
PPS14 Team
Regional Planning and Transport Division
Room 3-01, Clarence Court
10-18 Adelaide Street
Belfast BT2 8GB

5th June 2006

Dear Mike

**RE: Dungannon & South Tyrone Borough Community Response to PPS14
'Sustainable Development in the Countryside'**

Please see attached Dungannon & South Tyrone Borough Council's response to PPS14. This response has been developed following extensive consultation across the Borough. A copy of the Council's public meeting is also attached at which 125 people were in attendance.

The Council is gravely concerned at the proposed policy document and would urge the Department of Regional Development to consider further consultation with Councils on this.

Dungannon & South Tyrone Borough Council has stated its concerns within the attached response and has would request that this policy does not proceed in its current form.

It is perceived that this proposed policy is part of an anti rural agenda by Government and contravenes the human rights of rural dwellers to continue to live in the countryside. It also has major equality issues in terms of the commitment by Government to the region of Northern Ireland as stated in Shaping Our Future.

The Council is also a partner in a joint response on behalf of the Western regional Councils (Magherafelt, Cookstown, Dungannon, Omagh, Fermanagh, Strabane). Again in this consortium response the joint Councils are asking the Department on behalf of its constituents to review this policy given its potential negative implications on the future of rural communities. It is important to note that the Western area Councils cover some 41% of the landmass of NI and represents around 15.7% of the population (2001 census).

Whilst the attached response focuses on the PPS14 policy, the Council would also like to raise concerns and recommendations to the Department on short terms implications for planning.

There is a need for flexibility for people who have received outline planning in terms of relaxing the timeframe for submission of full planning. This would go some way to support the provision of housing sites over a longer period.

Flexibility is also required for people who have submitted planning before the 16th March in terms of accidental error in completing forms etc. As it has become evident that accidental error in application submission is being used as a form of refusal for resubmission under the new draft planning policy PPS14.

Dungannon & South Tyrone Borough Council would like to request a review of the release of phase II land zoned for development taking into account increased housing demand and the availability/release of land in phase I.

The Council would seek that Planning review the position on site meetings, given the emphasis on site integration and responsibility for sustainable development. Consistency of planning application and enforcement also remain concerns for Council.

Given that PPS14 is being developed under an alternative process, this would allow an opportunity for further consultation and interaction on a revised PPS14 policy before a final decision is taken.

The Council would like to seek a meeting with the Minister to relay its concerns to PPS14 and to offer support, given it's future role in planning, in the development of a policy to ensure real sustainable development in the countryside.

Please contact myself to arrange a meeting or if you have any queries relating to Council's submission.

Yours sincerely

John Campbell
Chief Executive

Dungannon & South Tyrone Borough Council

PPS14 'SUSTAINABLE DEVELOPMENT IN THE COUNTRYSIDE'

Draft Council Response June 2006

PPS14 – BACKGROUND

The Department for Regional Development (DRD) formulated "Shaping our Future – The Regional Development Strategy for Northern Ireland 2025" in September 2001.

Shaping Our Future was the first document to acknowledge that rural required a specific chapter, which recognized the unique role that rural plays in the development of the region.

Shaping Our Future also states that policies for physical development have an important bearing on other matters such as developing a strong spatially based economy, a healthy living environment and an inclusive society, which tackles inequalities relating to health, education and living standards. The promotion of sustainable development allied to social and economic cohesion is an integral part of the drive to provide a strategic and long-term perspective for the development of the region up to the year 2025.

This was followed in June 2004 by an issues consultation paper 'Sustainable Development in the Countryside'.

DRD from their analysis claim an almost 50/50 split on the issue of retaining or removing the presumption in favour of building in the countryside.

This Draft paper PPS14 has issued a presumption of removing the presumption in favour of building in the countryside providing a strict sweeping guideline on development in the countryside, effectively creating a 'rural greenbelt'.

Consultation has taken place across Northern Ireland by DRD and by other organisations. Dungannon & South Tyrone Borough Council held a public meeting in Dungannon Leisure Centre to which 125 people attended.

In summary of the consultation events, people are aware that there has been unsustainable development in the countryside and that this is having a negative impact in areas across rural Northern Ireland. However whilst a small number of people have contributed to unsustainable development the situation mainly lies with Planning. Planners have failed to implement the Green Book standards in terms of rural housing integration in the countryside, no build up, no ribbon development, and a commitment to promote good design. As we know these guidelines were not consistently adhered to which resulted in unsustainable development.

The presumption should be in favour of sustainable development with restrictions to support this to happen.

Dungannon & South Tyrone Borough Council Response

The Council has real concerns over the statistics used by the Department to inform the policy which show to be inaccurate.

1. Inaccurate Statistics

The minister quotes a figure of 9,520 approvals for new rural dwellings in 2004/05. The Commercial Information Company (CIC) (a specialist provider of Planning information supplied by the Planning Service) records a figure of 8,216 Full and Outline approvals.

The Minister also states that the figure for 2005/2006 will be well over 12,000, but the CIC figures show 6,983 Full and Outline approvals to 10/3/06. This is a FALL of at least several hundred and certainly nowhere near the 12,000 quoted.

Statements previously on the DRD website, www.drdni.gov.uk (consultation zone) also inflated figures. "In the last 10 years over 86,000 new dwellings were approved, equivalent to building 2.5 Derry Cities in the countryside." This is inaccurate. The CIC figures show 59,000 Full and Outline approvals rather than 86000.

Whilst it is recognised that there has been an increase in the numbers of planning applications for dwellings in the countryside, this can be partly contributed to the leak of this forthcoming policy.

2. Equality

There is no provision in the plan for people with disabilities or the elderly. Given the statistics for a growing aged population in the future this will have serious implications. There is an added problem for the elderly in rural areas in terms of family care support that will not be available if there is a presumption against planning. Traditionally families have provided the required support to the elderly in rural communities, alleviating pressure on government in terms of care. Families want to continue to provide this support and require flexibility in planning to do so.

The plan will also have a real impact on young people in terms of affordability. If house prices continue to rise, given the demand and supply un-equilibrium created by this Policy, this will have a greater impact on young people who plan to get onto the property ladder. Therefore first time buyer, generally the young, will be disadvantaged in terms of access to a home.

A large percentage of the rural area and countryside is West of the Bann; therefore this policy will have greater negative implications for people living in this area. In terms of section 75 groupings the policy will therefore have a greater impact on the Catholic community, which has a higher representation in the West of the region.

It is important that the policy is adequately equality proved in terms of its impact on sections of the community in terms of Section 75.

3. Sustainable Development

CTY1 identified as the most important section within the document as the overriding principle for the remainder of the policy is seriously flawed in terms of its analysis.

Sustainable development in the countryside should not mean a presumption against planning, as this would undermine the planning system in NI and planners in terms of their ability and expertise to implement sustainable development policy.

The draft policy document focuses on sustainable development through the environment but gives no consideration for the other two pillars of sustainability that being social and economic development. Whilst it is accepted that environmental development is important, consideration must be given to rural areas as places to live and not countryside parks for urbanites. The proposed PPS14 should simultaneously provide for its most valuable asset, its people, without whom there is no so-called "sustainability".

Whilst it is accepted that unchecked development in the countryside is neither desirable nor sustainable, Dungannon & South Tyrone Borough Council would strongly oppose a Policy that fails to acknowledge a diverse economy beyond the environment and most importantly the strong sense of belonging and attachment to place felt by those living in rural communities including but not exclusively those involved with agriculture.

The principle of sustainability is to be supported along with green belts, areas of outstanding natural beauty and other designated/protected areas, but the proposed PPS14, with an almost blanket ban on new housing in the countryside, will in many ways prove counterproductive in achieving this end and will have massive implications for rural schools, post offices, etc and the sustainability of rural communities.

Rural communities have and continue to be actively involved in sustainable development, which is evident from the level of self-development in rural areas (a large element of which has been provided without government support). There is a strong community support infrastructure across rural NI, community sport and Church organisations who play an active role in youth interaction and development, and embedded social structures which have been instrumental in alleviating social problems visible elsewhere and predominant in urban areas.

This Policy PPS14 is questionable in terms of its statement that the provision of housing will be supplied through towns and villages. There is real concern as to the viability of this option and the potential for a major housing demand/supply crisis, forcing the price of housing upwards to an unrealistic level for the economy. Experience from the areas in the ROI and Scotland has shown that urban focused planning and development has led to real problems in terms of rural decline and increased social, transport and sprawl problems in urban areas. Given this experience, these areas have now reversed their policies in favour of planning in the countryside.

Dungannon & South Tyrone Borough Council has grave concerns that the Department for Regional Development is being led by a small number of people within environmental lobby groups. It is important to note that rural people have and continue to be responsible and sensitive to the needs of the environment. In rural Northern Ireland they have and continue to look after the countryside as custodians of the land and do not favour unchecked or inconsistent development.

It is also important to consider that Northern Ireland is not a homogenous region in terms of a single planning solution. East and West are not comparable. This is evident given that a large percentage of unsustainable planning complaints have been towards areas in the East of the region as a result of overspill from the Belfast Metropolitan Region, whilst areas in the West of Northern Ireland are only beginning to repopulate after years of decline. Sustainable Planning policies should be tailored to suit areas.

Historically development, and industry and commerce have been directed East of the region, a planning policy needs to address and allow for dispersal and development across all of NI as a region, as stated in 'Shaping our Future'.

Proposal

To ensure this policy addresses the real definition of sustainable development and integration and balance of the economic and social strands. Any real vision of sustainable development in the countryside must take account of rural people and the fabric and identity of rural communities.

To ensure a future planning policy statement for sustainable development in the countryside takes account of Northern Ireland as a diverse region, particularly in terms of the East/West split and future regional development.

4. Agriculture

Whilst the document does make some provision for agricultural development and for farm families, it does have limitations for farmers who have previously sold land as a disposable asset or who do not have a viable farm to support employment. This is unrealistic and does not take account of the changing agricultural industry, in terms of part time farming, and family support from sons and daughters where the luxury of a full time agricultural wage is not available. It must be recognized that farming in Northern Ireland is very different from that of England, which it would seem this plan is based upon (reference PPS7). Northern Ireland farming is tenant based which relies on the support of its family and surrounding community (voluntarily) for operation.

Many farmers and farm families trying to diversify and avail of off farm work to maintain the family farm will be negatively impacted by this policy. The criteria set out for farm families is unclear and the use of the term 'Hobby farm' is inappropriate, especially given the family time commitment to agriculture and to being custodians of the land.

It must also be recognized that there has been real challenges to the agricultural industry over the last ten years contributed by EU regulation, BSE, Foot and Mouth etc. In the changing face of agriculture where the farm holding can be the only disposable asset to help defray growing costs or debts, farmers have had to resort to selling sites. PPS14 now restricted a farmer's son or daughter, engaged in farming, to get planning permission where a site has already been sold off from the farm holding.

Proposal

To address the policy in terms of its implications on farm holdings for those who have sold a site previously, particularly in light of the agricultural industry over the last 10 years.

To take account of the changing agricultural industry in Northern Ireland and to provide flexibility for all farming not only those of large employment farms, and as part of this to take into consideration the vast support role of farm families.

To use ICAS as a criteria for farmers and farm families to avail of opportunities for development in the countryside.

5. Non-Agriculture Rural Communities

Contrary to what the new policy document states rural areas are made up of a more diverse range of people than just farmers. Whilst fewer families in rural areas now identify with agriculture, they do still identify with their local community and family tradition. The overwhelming majority of country people have not been catered for in this document. They will be among the many who will be forced to leave their family lands and, in many instances, the whole rural support network, be it family, educational, cultural or sporting that goes with it.

A large percentage of the unsustainable development to date has resulted from new people moving into areas who have added little to community life, services, the economy and local identity; and on many occasions have only been interested in capital gain. Rural communities have for years both farming and non farming taken great pride and responsibility for looking after rural areas, and want to continue to do so in partnership with good planning practice.

Given Northern Ireland's unique situation as a divided society, identity and community have played a vital community support role, and continues to do so as people move forward under 'A Shared Future'. Peter Hain stated recently 'We want to encourage partnerships between communities and engender a sense of pride in space shared with neighbours, so that peace lines are gradually transformed to a dynamic, welcoming and safer environment' (speech for ICTU Newry 25th April 2006). This planning document does not give this issue consideration and will result in the opposite of what is being proposed, as it will lead to a breakdown in communities.

Proposal

There needs to be provision within the document to address kinship and community identity in housing in the countryside. Similar policies have been

introduced elsewhere. In the ROI a kinship criteria for ensuring that rural people have an opportunity to remain in their areas has been introduced, and in Scotland rural people have been proactively supported to live in rural areas through the use of agricultural and forestry land. Both of these examples have contributed to the sustainable development of rural life. In supporting the implementation of a kinship policy it would be important to ensure an occupancy criterion of a minimum number of years (five years) thus avoiding speculation.

6. Social Mix and Affordability

PPS14 will impact most severely upon people from rural communities on lower incomes wanting to live near their families.

The impact of this policy on the supply and demand equation will have a direct impact on house prices in rural and urban areas. At present first time buyers are finding it difficult to secure a home, even with an increase in mortgage lifetimes to 30 years, and this situation will get worse. This plan will create a situation similar to that in England where housing supply is so low compared to demand that such practices as mortgages being left to the next generation will occur, and this will be for the fortunate people.

The document is also void of any proactive policy to address affordability and social integration. The document refers to creating small clusters of social housing in rural areas where needed. Apart from not wanting to return to a policy of social housing development of the 1970's of isolated estates, it is also not viable.

It is evident from recent Northern Ireland Housing Executive policy and social housing associations that isolated social housing is no longer a viable option. Social housing can only be provided through integration, to allow for a release of private housing to support economic viability. A further viability argument will ensue in terms of inaccessible sites due to inflationary prices.

It is important that affordable/social housing is included in the PPS14 policy. This needs to be based on social and environmental integration and good quality, and not developer led. It also needs to ensure that kinship is addressed to sustain rural communities and avoid short-term gain.

Complementary to this is the need for government departments to use its' planning powers in the provision of integrated affordable/ social housing in private developer schemes. Successful models of affordability and social housing mix have been implemented across the UK and in particular Cardiff and Glasgow. This links to the avoidance of planning powers to ensure developers' meet their responsibility in housing development. Too often other government departments and the ratepayers have to pick up bills to supplement private profit gain. A common example of this is the provision of play in housing development, however there are more serious implications such as sewage and service needs. Phase II zoned development land should include integrated social/affordable housing.

Proposal

It is important that a future planning policy would proactively address integrated social and affordable housing in rural Northern Ireland. To avoid speculation, it is important, as mentioned previously, to implement tenure agreements.

To proactively use planning powers to ensure developer responsibility.

7. Waste Disposal

Sewage is another issue cited as unsustainable development and an environmental concern. Issues around proper control of sewage effluent from dwellings does not require a major overhaul of planning policy, merely a change in its implementation.

The onus should be on the applicant to provide satisfactory septic tank arrangements, and given our new technology this should relate to new environmentally eco friendly solutions, examples of which can be found in Donegal.

Building Control in local authorities could also support Planning in terms of ensuring effective systems and infrastructure are in place before development can proceed.

Given that the sewage system has been held up as a major concern it would question the role of Water Service and EHS over the last number of years. The waste crisis requires attention through investment, as there has been little to no infrastructure development in this area over the last number of years. New up to date sewage facilities are required on main roads across rural Northern Ireland. A similar situation will be warranted in settlement areas that are currently under strain.

Proposal

To include within the document a commitment to upgrade the NI sewage system along key roads in NI and to look at new innovative septic tank systems which should be the responsibility of the homeowner to provide.

8. Replacement Buildings

There is the opportunity in PPS14 for greater emphasis to be placed on the restoration and re-use of derelict and vacant traditional buildings, or what is commonly known as Brownfield sites. It is important that greater flexibility is provided in this policy area to allow buildings that have been abandoned for a short and longer- term period to be included, along with previous residential use and other non-residential buildings e.g. barn conversions. It is important that replacement buildings are maximized in terms of their contribution towards the supply of housing and ensuring environmental sustainability.

It is also important that the natural setting of Brownfield sites is retained, particularly site integration. Clear guidelines need to be set for Brownfield site development in terms of natural setting and integration, and enforcement used for abuse, which Councils could support and endorse.

Proposal

It is important that a future planning policy maximizes the use of Brownfield sites (derelict sites and replacement buildings) in the countryside, and that clear guidelines and enforcement are in place to ensure that natural setting and site integration are preserved.

9. Integration of housing design with the environment

Integration of housing with the environment is of major importance. This has been a key principle in the past in planning, however it has not been given adequate attention or enforcement. It should be the responsibility of the person building the house in liaison with planning to show that the proposed dwelling is discretely screened from public view, safeguarding the integrity of the countryside.

Agreeing the building of appropriate size and shaped buildings for rural Northern Ireland is key, vernacular style does not provide for control of building size, which has been a major issue in poor planning. The document does not provide for specific guidance on this or the commitment to enforcement. The department's guidelines also fail to recognise the historical regional variation of design and that rural areas in NI often differ on a geographical basis.

Guidance in Northern Ireland should not equate with other parts of the UK, all of which are very different in terms of environment, economics and most importantly community and the need for local identity.

It is important that community planning is used as an effective tool to engage local people and provide ownership of future sustainable rural planning, including good design and integration.

An issue that has not been highlighted in the policy, which has been a contributor to unsustainable development and poor integration, is the lack of an effective neighbourhood notification scheme. At present the scheme relies on the goodwill of the applicant to provide the necessary details of neighbours and it only relates to the immediate neighbour. It also provides no guidance to design or integration. Other areas have implemented innovative systems, such as the ROI, who stipulate that public notices with detail of the proposed plan must be displayed on the intended site.

Proposal

It is important to ensure clear site integration and design guidelines are part of a future policy and that this includes a commitment to enforcement.

To support sustainable development and good site integration and design it would be valuable to incorporate community planning and to implement a good neighbourhood notification scheme.

10. Joined up Government

It is important that the future Planning Policy PPS14 for Sustainable Development in the Countryside is developed through integration with other departments and policies. Given the blanket approach of the policy and its implications on the future development of rural communities it would seem that it would contravene the work of other policies such as the new Rural Development Policy and Strategy 2007 -2013 and A Shared Future.

There is a real issue in terms of rural proofing of all policies. This policy has either not been rural proofed or inadequately. The PPS14 policy in its current form will have drastic negative consequences for the future sustainability of rural areas in terms of all three strands social, economic and environmental.

It is important that joined up government takes place at all levels. For example at operational level Building Control should be able to support the Planners in ensuring sustainable development. However it is difficult to do this if minor processes, such as providing evidence of planning permission and site details in advance of a building inspection, are not in place.

Proposal

To ensure PPS14 policy complements other government policy and strategy.

To ensure any final PPS14 document is rural proofed, as this current document would fail in terms of its impact on rural areas.

To ensure partnership across government to allow for joined up working at operational level.

11. Governance

Councils would seek to work in partnership with DRD on the future development of a planning policy for sustainable development in the countryside, particularly in light of it's future role specified in the RPA.

It is important that community planning, as committed to by Government in the RPA, has a key role in future planning in rural areas. Community planning models are being trialed at present and it would be useful to analyse these and look towards implementation of good practice.

The planning process timescale has and continues to be an issue. It is important that future planning becomes more effective and efficient, without losing quality in terms of ensuring sustainable development and good planning.