



**MINISTERIAL ADVISORY GROUP  
FOR ARCHITECTURE AND THE BUILT  
ENVIRONMENT FOR NORTHERN IRELAND**

**RESPONSE TO THE PUBLIC CONSULTATION  
ON THE DRAFT SUPPLEMENTARY  
PLANNING GUIDANCE TO PPS21:  
"BUILDING ON TRADITION,  
A SUSTAINABLE DESIGN GUIDE FOR THE  
NORTHERN IRELAND COUNTRYSIDE"  
JULY 2011**

**PUBLIC CONSULTATION ON THE  
DRAFT SUPPLEMENTARY PLANNING GUIDANCE TO PPS21:  
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**Ministerial Advisory Group**

In September 2007, DCAL established the Ministerial Advisory Group (MAG) for Architecture and the Built Environment in Northern Ireland. MAG's primary role is to advise the Minister responsible for DCAL on the implementation and development of the Architecture and Built Environment Policy for Northern Ireland.

**Purpose of Paper**

This paper from the MAG has been prepared for the public consultation on the Draft Supplementary Planning Guidance to PPS21: "Building on Tradition, a Sustainable Design Guide for the Northern Ireland Countryside", which was published in March 2011.

1. The following information is provided as an **overview of the MAG's commitment** to the matters of Planning Policy Statement PPS21 'Sustainable Development in the Countryside' and the draft supplementary planning advice contained in the draft Design Guide.
  - a. The MAG made a response to draft PPS21 in March 2009.
  - b. In September 2009, Professor Barrie Todd, Chair of the MAG, was invited by DOE to represent the MAG on a 12 member Steering Group with DOE Chair and project management, regarding the tender Specification and subsequent production of the proposed PPS21 SPG Design Guide by the appointed consultants.
  - c. The tender for the PPS21 SPG Design Guide, as approved by the Steering Group, was published in November 2009. Consultants were appointed in February 2010 to produce the PPS21 SPG Design Guide to meet the Specification with the guidance of the Steering Group.
  - d. The final PPS21 was published in June 2010, but it is not understood that the Steering Group for the Design Guide had any input into the confirmation of PPS21 during their session.
  - e. Following Professor Barrie Todd's retirement as Chair of the MAG Arthur Acheson was appointed as Chair of the MAG in September 2010 and replaced Barrie as the MAG representative on the DOE Steering Group.
  - f. The work of both the consultants and the Steering Group was completed with the publication of the draft PPS21 SPG Design Guide for public consultation in March 2011.
  
2. **Relating to PPS21**, the MAG's main comments were summarised as follows:

## 6.00 SUMMARY

Simply stated, MAG advises that a revised PPS 21 should do four things:

1. **Define its terms and use measurable standards;**
2. **Designate a Northern Ireland Countryside Conservation Area using guidance from the Northern Ireland Landscape Character Assessment (professionally updated and revised as necessary on a continuing basis into the future);**
3. **Provide for encouragement of self-sufficiency in lifestyles as part of sustainable development;**
4. **Provide for every countryside road (major and minor) to have a safe multi-purpose pathway alongside the road to facilitate walkers, cyclists and riders.**

The MAG indicated in its consultation response to PPS21 that the policy should:

- a. Embody respect for the countryside as an essential social, economic and environmental resource for the wellbeing of Northern Ireland, and convey understanding how it (including its buildings and settlement patterns, scenery, employment, resources, biodiversity, leisure pursuits, etc) has evolved in the manner it has, and highlight the sustainability benefit embodied within these traditions (1.01-1.03).
- b. Consider that this resource would be best managed similar to the principles of a Conservation Area, and guided by the Landscape Character Assessment (LCA) process, and Countryside Policy Areas (CPA) already designated through the Countryside Assessment process (1.10, 4.02).
- c. Put the wellbeing of the countryside first by requiring all development to demonstrate through its location, design and embodied lifestyle how it benefits and enhances that countryside resource (1.11), ie. not to concentrate on facilitating new development, but rather on facilitating benefit to our countryside (and therefore economic, social and environmental wellbeing for Northern Ireland) (3.02).
- d. Define sustainable development, and comprise clear overarching principles regarding sustainable development in the countryside, namely (2.08):
  - i. Visual – impact on tourism, wellbeing
  - ii. Location – impact on travel, energy, flooding, services
  - iii. Self-sufficiency – impact on lifestyle, travel, services, energy, waste, mixed-use, reskilling
  - iv. Ecology – impact on habitats, water
  - v. Reuse of existing built stock – impact on energy, waste, heritage
  - vi. Heritage – impact on social and place value
  - vii. This concerns all development, not primarily residential
  - viii. Design quality encompasses all of the above.

- e. Avoid non-defined terms so that inconsistency arising from differing opinions is avoided (2.08).
  - f. Provide a clear hierarchy of policies for all development (with no exceptions for social housing, farms, business etc) (2.07, 3.10, 3.01):
    - i. Sustainable development (as point d above)
    - ii. Enhancing the countryside
    - iii. Reuse before new build (all cases, not just important cases)
    - iv. Cluster, gap (but not ribbon), no sprawl, mixed-use
    - v. Temporary development
  - g. The MAG does not consider that these core issues have been met in the published PPS21, and reiterates them here as essential and fundamental to the matter of Sustainable Development in the Countryside.
3. During the **process of preparation for the PPS21 SPG Design Guide**, Professor Barrie Todd, representing MAG on the Steering Group, made the following comments relating to a Design Guide for Sustainable Development in the Countryside:
- a. The importance of reusing and adapting existing building stock
  - b. The importance of local context
  - c. Concern relating to provision of illustrated design examples and worked design statements, and a preference for demonstration of a method or framework of headings, whereby good design might be achieved (to avoid promotion of 'pattern book' examples)
  - d. Desire for consultant architects to be appointed to assist planning decisions in the countryside to parallel practice in designated Conservation Areas.
  - e. Concern about providing a limited list of stakeholders for engagement in the process which is insufficiently inclusive
  - f. Concern about design which is primarily generated through plan form.
  - g. Suggestion that the proposed guidance is presented to the MAG for review and comment.
4. The following is stated in the published **Specification for the Design Guide** (November 2009):
- a. The Design Guide is for 'sustainable building practices and excellence in design in the countryside' (2.1, 2.4). However, it is also stated that the Design Guide is for 'sustainability and excellence in design' (2.7). The MAG recognises that whilst the latter of these comments clearly includes sustainability consideration as core to design (as per the MAG's PPS21 consultation comments (3d above)), the former comments could infer that design is somehow separate from sustainable building practices. Nonetheless, it remains clear that the Design Guide must cover both sustainability and design (whether together or separately).
  - b. That on publication of the document, the DOE will seek comment on the 'methodology on site selection, layout, design, clustering, landscaping considerations ... and integration]' (2.2, 3.3). As this is supplementary planning guidance to a policy for 'Sustainable Development in the Countryside', the MAG clarifies that it is the

sustainability aspect of these matters that the DOE seeks comment on.

- c. That the Design Guide should not be a detailed study of any particular category of development (2.5).
  - d. The list of stakeholders was not altered, despite Professor Barrie Todd's concern regarding its limited extent.
  - e. The Design Guide is to 'provide photographic and pictorial examples of possible design approaches (3.4), and 'example design statements' (3.7). This would seem to promote the provision of illustrated 'pattern book' examples that Professor Barrie Todd strove to avoid, rather than promote a method of design consideration for sustainability purposes.
5. The MAG has the following comments relating to the **published draft Design Guide**: 'Building on Tradition, a sustainable design guide for the Northern Ireland countryside; supplementary planning guidance to PPS21'.
- a. The order of the Guide is: 1 'place'; 2 'reuse'; 3 'visually integrated'; 4 'replacement'; 5 'new build'; and finally 6 'building on tradition'. The MAG would prefer that this order is altered to be: 1 'place'; 2 'building on tradition'; 3 'visually integrated'; 4 'reuse'; 5 'replacement'; and finally 6 'new build'. A similar point was made by Arthur Acheson, Chair of the MAG, in paragraph 64 of his document dated 21 October 2010.
    - i. If the chapter on 'place' were sufficiently robust (see comments below), the MAG agrees that it seems pertinent to place this chapter first, as providing a sounding board as to why sustainable consideration of development in the countryside is important.
    - ii. The MAG suggests that the matters of the final chapter 'building on tradition' should immediately follow this 'place' chapter, as comprising overarching principles for all building and development in the countryside (eg. sustainable rural development described as being 'participation in terms of our role in rural community life, society, economy, care and environmental footprint' (7.1.0); 'light touch in terms of environmental impact' (7.1.1)). The MAG encourages that these matters are stated first and not at the end of the document: that sustainable development in the countryside requires adherence to these principles of rural respect and value. Without these matters stated first, the sustainable agenda of the document is not high in evidence. It is important that the document acknowledges at its outset that this agenda does not just implicate being 'greener and more self-sufficient in how we power and heat our future rural homes and buildings' (7.1.1), but also in how we use them. ie. 'sustainable technologies for managing energy and water resources' (7.1.2) apply also to that of the lifestyle embodied by the building's development.
    - iii. The MAG likewise considers that the matters of the 'visually integrated' chapter are pertinent to all development in the

- countryside and should be stated at the outset (as part of, or immediately after 'principles for building on tradition').
- b. The MAG identifies inherent problems when the Design Guide seeks to place a hierarchy on the policies of PPS21. The Guide promotes 'reuse' above 'replacement' above 'new build'. The MAG supports this hierarchy, however the PPS to which it refers does not contain this policy hierarchy. The MAG requests that the PPS is amended to reflect the Department's acceptance of this policy hierarchy as stated in the draft Design Guide. The MAG considers also that, in many cases, the provisions of the Design Guide are not soundly backed up by the policy, and is concerned that successful applications could be made in compliance with PPS21 which do not follow the principles of the Design Guide. This was raised by the MAG in response to PPS21
  - c. The MAG is concerned that some statements made in the Guide are insufficiently justified by parameters for sustainable development. For instance, the MAG questions the use of the term 'visual integration'. If, as the Guide suggests, the term 'visual integration' is about directing development to focus 'regeneration of existing rural communities and their services, ... more sustainable use ... of existing building stock and settlement pattern, and to better manage the impact of isolated development on our rural landscapes' (4.1.1), and 'stewardship of the countryside and making sure that what makes it special today will continue to make it special for many years to come' (4.1.1), the MAG does not consider this to be achieved through consideration of visual matters alone. The MAG therefore requests that the Guide employs an alternative term 'Sustainable Rural Integration', which would include consideration of transport, services and environmental resources alongside 'visual' integration ; ie. visual integration is only a part of the 'integration' required for sustainable development in the countryside. The MAG response to PPS21 made it clear that visual integration is just one form of integration and referred to others such as location, servicing, ecology, reuse and adaptation, heritage, mixed use and design quality.
  - d. Some comments relating to 'good' or 'bad' design appear to be based on 'taste' (eg. p96-101) rather than justifiable matters of sustainable development. The MAG considers that insufficient justification is provided as to why some matters are not appropriate (eg. fussiness, materials). Along similar lines, the MAG would recommend removal of the phrase 'the secret is' (4.2.1, 6.3.2), as the contents of this Guide must be easily available to all and not communicated as if some mystical process accessible only to the select few. This accords with Professor Barrie Todd's statement that all persons are stakeholders, not a limited and select list and with Arthur Acheson's comment no. 38 made in October 2010. The use of annotated diagrams would assist in providing simple justification (as per the Cork Guide). The MAG is concerned that these matters of 'good / bad' relate primarily to form rather than considering fundamental principles for sustainable development in the countryside. This accords with Professor Barrie Todd's expressed

- preference for diagrams over photo examples. The MAG asks generally: is this document robust or prescriptive enough to prevent inappropriate housing development and bungalow blight?
- e. The MAG considers that the Guide may be too heavily biased towards housing to enable developers to believe that it applies to all development in the countryside. This is contrary to the Specification which required the Guide to avoid a particular category of development. This was also noted in point 9 of Arthur Acheson's response which stated, "There seems to be no guidance on the integration of large, modern farm and commercial buildings in the countryside." The MAG additionally requests that clarity be expressed to avoid conflict regarding the correct use of this Design Guide or the existing Creating Places guide at the periphery of a settlement, particularly in those areas noted as suitable for development as dispersed rural communities or at edges of settlements where social and affordable housing is to be approved.
  - f. The document is thick and heavy, and the MAG considers that its ambitions would be better served by being distilled to less pages. Filled with photographic images, it is necessary to turn too many pages before a particular guidance note is completed (ie. the relevant guidance cannot be accessed without interruption).
  - g. The MAG considers that the photographs are not as beneficial in terms of explaining the aspects of the policy as annotated volumetric diagrams explaining the key features would be (for instance, those of the exemplary Cork Rural Design Guide, authored by the consultants, and to which they were asked to refer). A photograph contains too much information, and it is hard to know what particular aspect of the image the Guide is trying to communicate (eg. The photographic illustrations of forms (2.9 and 2.10) seem incomplete without providing any real guidance on why these examples are chosen and why they are relevant). The MAG suggests that all photographs are reduced to annotated diagrams so that it is clear what guidance they are intending to convey. This has been a particular comment of Professor Barrie Todd throughout. The point was also made by Arthur Acheson in October 2010 when he cited many instances of potential misinterpretation due to lack of annotation of illustrations (particularly photographs) throughout the document.

**The following comments follow the structure of the document.**

- h. Chapter 2: relating to **the place which is Northern Ireland**, and the matters which contribute to that place
  - i. The MAG considers this 'place' information to be somewhat weak, as 'place' is presented primarily as aesthetic and spatial (rather than explained in terms of an evolution of natural environment and human lifestyle, how and why people lived and worked in the countryside, and the mutual development of the patterns of both lifestyle and countryside together). Whilst there is some discussion about the evolution of built 'form' in relation to resources, the MAG feels it is insufficiently explained that the physical and visual

'countryside' is the representation of a functioning system, which varies according to the mix of the basic elements which comprise it (eg. resources – water, minerals, food, climate, biodiversity; people / lifestyle – employment, leisure, travel etc). This 'place' information did not need to be reinvented by the consultants, and the Specification expected that this information would draw from the DOE landscape character guidance (NILCA 2000). This already existing assessment (prepared by landscape experts and approved and utilised as the basis for planning operations in Northern Ireland) has robustly evaluated the mix and evolution of these elements (resources and lifestyle) throughout Northern Ireland, and defined 130 distinct different landscape character areas as a result of matters far beyond the primarily visual as mentioned in the Design Guide. Use of the LCA is in the Specification, and the MAG response to PPS21, yet it has not been accorded any real significance in the output.

- ii. The MAG also notes that the chapter's reference to landscape character confusingly describes Northern Ireland in terms of 5 'character areas' which do not match the 6 broad landscape character areas of the NILCA (Antrim plateau, The North-West, Fermanagh, Lough Neagh basin, Mourne and South Armagh, Down). The MAG believes this inconsistency to be confusing and unnecessary, and requests correction accordingly. The use of LCA is in the Specification and the MAG is gravely concerned that this important Departmental resource is underused in the document. This point was made in sections 8, 10 and 11 of Arthur Acheson's October 2010 commentary.
- iii. There is a very incomplete and inadequate mention of the importance of the consideration of resources (water and biodiversity) in terms of development in the countryside, which (similar to the discussion on landscape character areas) the MAG finds insufficiently informed and misleading. This must be addressed. This was also covered in the MAG's consultation response to PPS21
- iv. 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. At this point, 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 through developing a lifestyle which is appropriate to its resources and wellbeing (MAG notes 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), and requests this statement is also made at this point). This is the core ambition of the European Landscape Convention (ELC), to which the DOE is obliged to adhere: it is essential that anyone developing in

the countryside accepts that the embodied lifestyle of the proposed development should take responsibility for its impact on value of the landscape of its location. This point was also covered in the MAG's response to PPS21 (see 3.c above)

- v. No explanation is given on the sustainability design criteria of the materials demonstrated (pp44-5). This collection of photographs was critically reviewed by Arthur Acheson in October 2010 as "a confusing visual melange without any commentary."
- i. Chapter 3: relating to the **potential of reuse**:
  - i. The MAG considers the content of this chapter generally acceptable, but asks whether the document provides sufficient guidance and direction relating to restoring and enhancing an existing building (specifically in light of the inconsistency between PPS21 and the Design Guide in terms of policy hierarchy). Arthur Acheson has already referred to a lack of commentary and provision of potentially misleading annotations in respect of photographs in this section in paragraphs 24, 25 and 26 of his October 2010 commentary.
  - ii. The MAG identifies inherent problems when the Design Guide seeks to define the ambiguous term 'important' in the policy, and requests the Department to remove this criterion from the policy. This was specifically included in MAG PPS21 response yet it has made its way into adopted policy and draft Design Guidance, causing the MAG further concern.
  - iii. 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). The MAG believes that these are the critical design challenges for *all* buildings.
- j. Chapter 4: discussion on how building in the countryside might be **visually integrated**:
  - i. The MAG considers the content of this chapter relating to 'visual' integration generally acceptable.
    - 1. However, the Guide discusses the infilling of 'gaps' without providing a clear rationale for defining an acceptable gap (4.4.1). As is the case throughout the document, it is not defined what key aspect (good or bad) the photos aim to convey (eg. the photo below item 4.4.1 risks being interpreted as a good example of a ribbon development), which would be easily communicated through annotated sketches. This precise point was made by Arthur Acheson in October 2010, paragraph 40.
    - 2. However, sustainable development is not a visual matter alone, and the MAG 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 (as per the Specification). 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. Again, the MAG is concerned that 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. A similar point was made by Arthur Acheson in October 2010 in paragraphs 8, 10, 11 and 36. In this respect the document does not appear to accord with the Specification

3. Relating to the siting of proposals, some of the options demonstrated are very restrictive in terms of space and overlooking. The MAG supports these examples, but considers that as justification it should be stated that 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 MAG is similarly extremely concerned that 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). This comment echoes points made in the MAG response to PPS21
- k. Chapter 5: relating to opportunities for **replacement**:
- i. Replacement is justified by the Guide as a means to retain existing rural settlement patterns (including services and landscape features) (5.1.0). The MAG supports this explanation of replacement where reuse is not possible. There is no explanation, however, of the sustainability of the much illustrated example from Cork, when the questions were asked by Arthur Acheson in October 2010 paragraph 4 ".....was replacement a sustainable decision and why? Was any part of the original dwelling retained?"
  - ii. However, the MAG is concerned that whereas PPS21 states that reuse will be preferred for structurally sound buildings which are 'important', replacement of structurally sound buildings which not 'important' will be facilitated. The term 'important' remains ill-defined in this chapter of the Guide and the MAG requests revision of PPS21 such that consideration of Policy CTY3 does not rest on this term 'important'. Sustainable development principles would

accept that important buildings in terms of sustainable development will be those that may be visually recessive, being well-integrated into the landscape of the countryside. The importance of clear definition was a significant part of MAG PPS21 response.

- iii. The Guide states that 'off-site' replacement may be considered where betterment can be proved (5.2.4). The MAG considers the Guide is more clearly written relating to this point than the Policy, and requests revision of the PPS to reflect this accordingly. Arthur Acheson noted in October 2010 (paragraph 54) in respect of the Design Guide's "Basic Rules for Replacement Projects". "These are different from the Policy and if they are basic rules, they should be identical to the Policy."
  - iv. On a point of detail, the Guide appears to promote flat roofs as a means to connect the various elements of a building proposal (p97). The MAG would prefer that this apparent preference for a particular means of connecting volumetric elements is removed. (Professor Barrie Todd has been clear throughout the process that illustrations which might act as 'pattern books' should be avoided).
- I. Chapter 6: relating to **new build**:
- i. It is stated that the big house / big maintenance does not fit with the sustainability agenda. The MAG is concerned that the Guide does not provide any frameworks for houses or buildings which do fit with the sustainability agenda (except in wallpaper photographs which are not annotated to explain what aspects of the buildings shown make them sustainable examples). If these photographs are to be beneficial, they should be annotated and supported by diagrams explaining their sustainable credentials. This accords with Professor Barrie Todd's concern to avoid 'pattern book' guidance. The illustrations were analysed by Arthur Acheson in October 2010 against the stated design criteria and in paragraph 56 he detailed many instances where the illustrated examples appeared to depart significantly from the criteria.
  - ii. The MAG finds the contents of the list of 'things you many need' (p106) to be poorly justified. The 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. the MAG finds it hard to justify how 'car parked round the back' has any impact on sustainable development in the countryside whatsoever; 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 MAG notes that there are several established sustainability methodologies and requests that the consultants include these matters in this list of 'essentials'. This point was made by Arthur Acheson in October 2010, paragraph 66. If amended and improved, this list of crucial considerations for all development should be relocated to the start of the document as recommended by Arthur Acheson in October 2010, paragraph 64. This accords with Professor Barrie Todd's and the MAG's desire for the provision of a framework, or method, whereby sustainable design in the countryside might be achieved.

- iii. It does not seem accurate to infer that the landscape of county Antrim wraps itself less around buildings than the landscapes of the rest of Northern Ireland (6.3.1). There are many examples of buildings in county Antrim which are well integrated with the landscape or "wrapped" in it, as in the other five counties.
- m. Chapter 7: relates to matters of **sustainable development in the countryside**:
  - i. Relating to the design process, the MAG requests that 'and the wellbeing of the rural environment' is inserted after 'needs of the client' (7.2.0) This accords with MAG response to PPS21.
  - ii. The MAG considers that an additional stage is needed between Stage 1 and 2 (p119), namely 'Select Your Site'. The inclusion of this stage would accord with the requirements of the Specification. This Stage must include a checklist to assess whether or not the correct site is being selected for the proposal (services, transport, energy, resources, climate, visual, biodiversity etc). This Stage should also include how a design might evolve to benefit some of these issues.
  - iii. The MAG notes that 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. This accords with the Specification, with Professor Barrie Todd's concern regarding the importance of local context in all cases and with Arthur Acheson's comments of October 2010, paragraphs 8, 10, 11 and 36.
  - iv. Stage 4 concentrates only on visual matters. The MAG considers that this Stage must consider core sustainability matters (which as per the Specification, would include visual matters). It must say in this Stage: 'apply the sustainable environment checklist'.
  - v. The 'sustainable environment checklist' must come at the start of the Guide, and it should also deal with site selection.

- vi. The MAG does not consider that matters of Resource Efficiency in terms of Waste and Materials, and Biodiversity are 'new technologies' but rather demonstrate a revised approach to traditional solutions (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). Relating to waste, The MAG considers there should be guidance on the avoidance of light pollution.
- vii. The MAG considers it essential to state that Design Statements must be written specifically for the application in question (7.5.3), and would remove superfluous bullet points 1 & 2 (7.5.3). The design statement lists p133-135 should be amalgamated and consistent, as they are nearly repetitive which causes confusion. The MAG suggests that the list should be as follows
  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 and surrounding area (removing reference to enclosure above all other considerations, including 'environmental' attributes)
  3. Alternative design options, including measures taken to protect and enhance the attributes of the area and enhance the wellbeing of the countryside
  4. Rationale for building and site design for the sustainable wellbeing of the countryside. (It is important to note that many aspects of design do not relate to the building per se: the MAG considers that site design is integral with sustainable building design).
  5. How the design demonstrates regard for local distinctiveness and the rural setting; impact on critical views, and consideration of cumulative impact
  6. Explanation of how the strategic requirements of building and site design are met through detail
- viii. Relating to 'parking' (bullet 11 p134, bullet 7 p136), the MAG requests rewording to encompass accessibility through all means of transport. Generally, the MAG finds that the guide does not appear to address the issue of transport, appropriate approach (vehicular or alternative) to buildings, or screening of vehicles where approved. Transport concerns are part of the criteria for sustainable design, as per MAG PPS21 response.

## Conclusions

1. The document must be reviewed in terms of what it is actually for. If the Guide is about visual considerations only, then with some considerable overhaul and editing, it has the potential to do its job. If it is about sustainability in design principles in the countryside, then it is lacking. Sustainability is definitely embedded in the Specification to which the Guide must adhere.
2. The guide could be good at its visual role if the confusion that arises from the lack of annotated illustrations was removed. Both MAG Chairs seemed to particularly want to avoid this. Professor Barrie Todd was concerned about being too reliant on plans, and both would have preferred the use of annotated diagrams to pictorial illustrations, particularly photographs which present ambiguous messages. This includes those which appear to depart quite specifically from guidance and those which were clearly of a building designed under a very different policy (County Cork) as noted by the current MAG Chair, Arthur Acheson.
3. In order to be robust enough to be Supplementary Planning Guidance, the need to remove confusion also includes the inconsistency which is evident between the Guide and other policy (eg. PPS21, the NILCA, the Water Framework Directive etc).
4. The extent of the MAG team's commentary on the draft Design Guide, together with its departures from the Specification, the guidance provided initially by MAG Chair Professor Barrie Todd and latterly the commentary by successor MAG Chair Arthur Acheson leaves the MAG with grave concerns about the overall efficacy of the document if it were to be published without revisions.
5. The initial guidance and latter comments by the Chairs of the MAG were provided independently and confidentially to DOE. The comments in this response were prepared by MAG members without any knowledge of MAG Chair Arthur Acheson's comments until all had been drafted, yet many identical points were raised.
6. These concerns indicate that the opinion of the MAG is that the draft Design Guide requires a fundamental overhaul before publication.

MAG Team

**Members:**

**Emily Smyth**

**Jimmy Donnelly**

**Chairs:**

**Professor Barrie Todd, MAG Chair to 31 August 2010**

**Arthur Acheson, MAG Chair from 1 September 2010**

July 2011