



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

**COMMENTS ON THE PUBLIC
CONSULTATION DOCUMENT
RELATING TO
DRAFT PLANNING POLICY
STATEMENT
[PPS] 21
SUSTAINABLE DEVELOPMENT
IN THE COUNTRYSIDE**

MARCH 2009

MAG REVIEW OF DRAFT PPS 21 NORTHERN IRELAND SUSTAINABLE DEVELOPMENT IN THE COUNTRYSIDE

March 2009

1.0 Introduction

1.01 The Department of Environment, Planning Service PPS 21 Paragraph 5.1 states:

"The countryside is a unique resource. It contains landscapes of considerable quality and amenity, important indications of our cultural heritage and is also significant in terms of nature conservation and biodiversity by providing habitats for wildlife, flora and fauna. It is a recreational resource and a considerable tourist asset. The countryside is also home to our agricultural industry and to a considerable and growing rural community."

1.02 The Department of Environment, Planning Service PPS 6 Paragraph 1.1 states:

"The modern landscape of Northern Ireland is the result of some 9,000 years of human activity and change on the natural topography which has left us with a rich but vulnerable legacy. Archaeological and historic features such as tombs and forts, castles and churches, townhouses and farmhouses, grand architecture and vernacular buildings, industrial features and planned parklands are all significant sources of information about our past, and are often landmarks in our present surroundings."

1.03 The Department of Environment, Northern Ireland Environment Agency's publication of Landscape Character Assessments for Northern Ireland states in respect of the landscape:

"Although a small area, Northern Ireland has a great variety of scenic countryside, reflecting its contrasting geology and topography as well as a long history of settlement and land use. The mosaic of prehistoric monuments, traditional farms and buildings, forest plantations and wildlife habitats all contribute to the special landscapes that are part of our culture and heritage."

1.04 NIEA describes 130 Landscape Character Areas (LCAs) in Northern Ireland and confirms:

"Work on compiling similar biodiversity and geodiversity profiles for every LCA has recently been completed to complement the existing landscape descriptions."

1.05 The Ministerial Advisory Group (MAG) for Architecture and the Built Environment (Northern Ireland) advises that all these statements have been carefully prepared and accurately describe the characteristics of the environment in Northern Ireland. MAG advises that the work already undertaken by the Department of Environment in respect of the countryside has produced an excellent resource upon which the countryside policy for sustainable development can be successfully based.

1.06 Draft PPS14 was introduced on 16 March 2006 and immediately declared the whole of Northern Ireland except areas within Development Limits (as specified in Area Plans) a Green Belt / Countryside Policy Area.

1.07 PPS 21 was introduced on 25 November 2008 as a draft replacement for PPS14 and immediately reversed the position to virtually blanket "rural remainder" except for five "special countryside areas", with an open public consultation period ending on 31 March 2009.

1.08 This paper is submitted as part of the public consultation process.

1.09 Draft PPS 21 supersedes almost all other rural planning policies meaning that not only does the blanket Green Belt / Countryside Policy Area immediately disappear, but also all Area Plan Green Belts disappear for the currency of the draft. Countryside Policy Areas are immediately reduced to just five (renamed in the draft PPS as "Special Countryside Areas") without giving any justification for the removal of Green Belts and Countryside Policy Areas. This means that except for 5 "Special Countryside Areas", Northern Ireland effectively changes from being a blanket Green Belt to a blanket "rural remainder". Draft PPS 21 does not refer to the NI Landscape Character Assessments (2000 ERM) which provide management guidelines for development.

1.10 MAG advises that The Northern Ireland countryside, instead of being either

- blanket Green Belt / Countryside Policy Area or (with five exceptions)**
- blanket rural remainder, could instead be designated as**
- the "Northern Ireland Countryside Conservation Area",**

using the already available PPS 6 Section 7.0 "Conservation Areas" and the NIEA Landscape Character Assessments as the guidance on local areas where development may be acceptable subject to sustainable and satisfactory location, siting and design criteria. Designation as a Conservation Area is not intended to stifle development, but instead to protect, value and enhance the Conservation Area.

1.11 The current draft PPS 21 is written in language that provide for favourable consideration for planning permission to be granted in certain stated cases. MAG advises that in the same terms, these certain stated cases MUST be those which favour the countryside through their sustainable design. All development should be required to demonstrate how it offers benefit to the countryside.

2.00 Process Analysis and Commentary

2.01 Whilst an aim and objectives are stated, the purpose of the draft PPS 21 is unclear to MAG. It appears, along with its short lived predecessor, draft PPS 14, to have been prepared as a reaction to a perceived problem rather than as a means to plan effectively for a sustainable future.

2.02 Development Plans (Area Plans) have invested significant resources in preparation and examination in public before final adopted plans have been published. Each development plan has fastidiously examined every part of Northern Ireland in turn and produced policies in respect of every aspect of development related to the various areas. MAG would wish to ask, in principle, "Why is much of this work duplicated or discarded in a sweeping region-wide policy which dismisses much of this previous area-based work?" MAG advises that it is not acceptable for any Planning Policy Statement on this matter to be a "one size fits all" set of policies with specific reference to just five areas.

2.03 Draft PPS 21 does not contain any explanation of objectives for sustainable development in the countryside. In 3.2 the objectives for draft PPS 21 include for 'sustainable patterns of development' and 'a sustainable rural economy'. It is not stated what this means, or how it might be achieved. MAG advises that the following explanation of objectives for sustainable development in the countryside could form a basis for policy:

- **visual consideration in development is important because a visually pleasing countryside is good for**
 - **the economy: tourists and visitors want to go there; people want to live there**
 - **health and well-being: people feel emotionally better, people want to get out and be active in it (walking, cycling etc);**

- **location consideration in development is important because well-located development has implications for**
 - **travel – development which can be easily accessed on foot or public transport means less need for individual car transport and energy use**
 - **energy – sheltered development has less energy use for heating etc**
 - **flooding - avoidance of loss of land necessary for flooding retention and attenuation;**

- **self-sufficiency in services (and food) consideration in development is important because if development can be self-sufficient then there is**
 - **less need for travel**
 - **less need for over-loaded central services eg. energy purchase from across the globe, sewer connections and treatment**

- **the potential to provide energy to the grid and not rely on it as an energy source**
- **small scale treatment (eg. of sewage) can be achieved ecologically on site in the countryside which is more sustainable than relying on chemical treatment of regional quantities;**
- **ecology consideration in development is essential because our life is inextricably dependent on nature. This includes awareness of habitats, wildlife corridors, water etc. The NI Landscape Character Assessment (2000 ERM), referred to above, includes landscape, ecology and geology in its recommendations for management. Development which causes detriment to its ecological habitat is not sustainable.**
- **Reuse and adaptation of existing stock is important for reasons of energy input, waste output, etc. (In this case, MAG understands 'stock' as both built and natural/ecological.)**
- **heritage consideration in development is essential because this assists in the social understanding of the provenance and evolution of a place and its interrelationship with the community within it. If a community value their place, the development they propose within it will sustain and enhance that value. Heritage assists a community to perceive the interdependence of lifestyle and place, and moderate both for mutual benefit – and that is sustainable.**
- **mixed use development, even on a small scale and in the countryside dwellings should be considered in conjunction with enterprise – for travel, security, social well-being etc. In other words, PPS 12 should not be primarily addressing dwellings in the countryside, but should be applicable to all development, residential and non-residential.**
- **Design quality consideration is essential and MAG, with its close involvement in the implementation of the Northern Ireland Policy for Architecture and the Built Environment, would be willing to assist DoE in the preparation of design guidance which recognises that good design goes beyond visual appearance or style. MAG advises that design guidance should recognise the variety of Northern Ireland's landscapes and should specifically link to the three guiding principles of the Architecture and Built Environment Policy, which are**
 - **Creativity and Innovation,**
 - **Heritage and**
 - **Sustainability.**

The Department of Environment may have other objectives for sustainable development in the countryside. MAG advises that a revised PPS 21 should state and explain these at the outset, which will lead to an understanding as to how planning policies might address that, and what the policies of PPS 21 are ultimately aiming to achieve by their application. (Please see Appendix

1 of this paper, which compares the Aim and Objectives of PPS 21 with the policies applied to conservation areas in Northern Ireland.)

2.04 No terms are defined in PPS 21, except "active farming" which is defined on a website addendum. Instead, without definition, the document offers extensive amplification and justification of policies. There is an attempt to "categorise" types of development, not based on Use Class Orders or any other accepted method and including wide general terms such as "other dwellings" and "other buildings". This is an unsatisfactory approach which attempts to use examples rather than clear definitions. MAG advises that the language of draft PPS21, if allowed to appear in any adopted policy, will cause continuing uncertainty, particularly in cases of examples which are either not covered or duplicated by being able to be in more than one category of development in the overly specific text.

The use of imprecise words such as "normally" and "exceptional circumstances" will allow continuing debate and conjecture about what constitutes normal and what is exceptional. The concept of sustainability is not defined. Neither is the process of sustainable development defined. If draft PPS 21 intends to produce sustainable development in the countryside, that should be referred to in its content. For sustainable development, all development which is approvable must enhance and benefit the countryside (not just maintain or 'not cause detriment to' it). All development in the countryside must aim to create a valued countryside. Overall, the policies are too reliant on visual aspects of proposed development. These planning policies should include for sustainable development in the countryside. (Eg. MAG advises that a revised PPS 21 should replace the word 'unobtrusive' in all cases with 'to benefit the countryside').

2.05 PPS 21 contains 16 policies, described as CTY 1 – CTY 16 and 3 Annexes described as Annex 1 – 3. As well as replacing PPS14, PPS 21 takes precedence over 32 policies in the Planning Strategy for Rural Northern Ireland and also takes precedence over the policy provisions for Green Belts and for Countryside Policy Areas (CPAs) with five CPA exceptions which are changed in title, without explanation or justification to "Special Countryside Areas".

2.06 Policies CTY 1 to CTY 5 and CTY 7, 9 - 12 describe various types of development for which planning permission could be granted. CTY 6 allows for personal and domestic circumstances to influence the planning decision, CTY 8 is negative concerning ribbon development. CTY 13 and 14 describe design and rural character, CTY 15 relates to the setting of settlements and CTY 16 to development requiring non-mains sewerage.

2.07 The policies contained within draft PPS 21 are presented without hierarchy, so that there is no overall policy principle stated before entering into the specifics. For logical application in practice, the policies should be arranged hierarchically, such that the overarching policies are first, and specific policies are only dealt with after the fundamental principles are

established. Draft PPS 21 policies can be grouped into 6 essential themes, which can be arranged in order of importance regarding sustainable development in the countryside:

Policy Theme 1. Policies which are applicable in all cases for development in the countryside: CTY 13, 14, and 15. (This theme should essentially seek that development adheres to requirements relating to the objectives to be stated at the outset (ie. not just the visual and location aspects of development in the countryside, but also servicing, ecological aspects, reuse and adaptation, heritage, etc). Clearly this might be split into several policies, one for each of the objectives)

Policy Theme 2. Policies regarding the reuse or replacement of existing building stock: CTY 3 and 4. (This theme should essentially require that reuse and adaptation of existing is the preferred solution)

Policy Theme 3. Policies which state when a new development would be permitted: CTY 1, 2, and 8. (This theme should essentially detail the special cases for individual development proposals or group development proposals as applicable)

Policy Theme 4. Policies which concern the use and user of the proposed development: CTY 5, 6, 10, 11, and 12. (This theme should essentially detail specific policies (if relevant) for users and uses)

Policy Theme 5. Policy regarding temporary development: CTY 9. (This theme should provide for essential considerations for temporary development)

Policy Theme 6. Policy regarding services: CTY 16. (This theme not required: the essential contents of this theme are already covered in Policy Theme 1)

2.08 The following descriptions in draft PPS 21 are not measurable:

- Preamble page 8 "overriding policy or material considerations"
- CTY 1 "overriding reasons"
- CTY 3 and CTY 16 "exceptional circumstances"
- CTY 3 "important element in the landscape"
- CTY 3 "established curtilage"
- CTY 3 "modern living requirements"
- CTY 4 "appropriate to the locality"
- CTY 5 "adjacent to or near", "close to" and "in close proximity to"
- CTY 6 "compelling, and site specific reasons"
- CTY 7 "where a site specific need can be clearly demonstrated"
- CTY 8 "a small gap site"
- CTY 9 "planning and environmental considerations for a permanent dwelling"

- CTY 12 "appropriate to its location"
- CTY 12 "essential for the efficient functioning of the holding"
- CTY 13 "a prominent feature in the landscape"
- CTY 13 "inappropriate" design
- CTY 13 "blend with the landform"
- CTY 13 "visually linked or sited to cluster"
- CTY 14 "unduly prominent in the landscape"

Each of the above descriptions is a matter for opinion and argument within the decision making process. Use of unmeasurable descriptions will cause continuing uncertainty about what development is permissible and what is not. Accusations of favouritism, inconsistency and the potential for corruption will continue into the new planning system which will be inherited by the newly forming District Councils to operate. MAG advises that if it is to be acceptable, Draft PPS 21 must be changed so that "facts" and not "opinions" are used to form the basis of determination of planning applications in the countryside.

2.09 The document introduces a further lack of clarity as to the status of Planning Policy Statements when compared to Development Plans.

2.10 PPS1 (Para 42), PPS2 (Para 30) and PPS 21 (Para 4.2) all state exactly the same thing: "Countryside Assessments are an integral part of the development plan-making process"

2.11 The Northern Ireland Landscape Character Assessment Series 2000 (NILCA) comprises part of the Countryside Assessments. The Landscape Assessments have influenced the designation of Countryside Policy Areas (CPAs) in development plans, yet draft PPS 21 which supports Countryside Assessments (which include Landscape Assessments) as part of the development plan process eliminates all but five of these CPAs:

- "(a) **The Islands CPA** as identified in Fermanagh Area Plan 2007;
 (b) **The Undeveloped Coast CPA** as identified in Larne Area Plan 2010;
 (c) **The Slieve Croob CPA Zone A** as identified in Banbridge District Rural Area Subject Plan 1986 -1998;
 (d) **The Ring of Gullion CPA Zone A** as identified in Newry and Mourne Rural Area Subject Plan 1986 -1999; and
 (e) **The Mourne Area of Outstanding Natural Beauty CPA Zone A** as identified in Newry and Mourne Rural Area Subject Plan 1986-1999.

These excepted CPAs, listed under (a) – (e) above, will change in title to Special Countryside Areas."

All other Green Belt / Countryside Policy Areas (which have been carefully defined, articulated and protected through the Development Plan process) have been immediately eliminated by the draft PPS 21.

2.12 Draft PPS 21 preamble states:

**"The provisions of these policies will prevail unless there are other overriding policy or material considerations that outweigh them and justify a contrary decision."
Thus it is entirely at the discretion of the decision maker which policies prevail. MAG advises that this is an unnecessary complicated methodology and not one which will lead neither to clarity nor to facilitation of decision making which is equitable and seen to be equitable.**

2.13 The documents confirm therefore:

- **Draft PPS 21 recognises Countryside Assessments,**
- **Countryside Assessments lead to the designation of Countryside Policy Areas, but**
- **draft PPS 21 declares that all but five Countryside Policy Areas (now renamed as Special Countryside Areas) are no longer relevant to decision making, and that**
- **new Special Countryside Areas will be designated in future Development Plans**
- **If Draft PPS 21 endorses Countryside Assessments which demonstrably lead to Countryside Policy Areas and Countryside Policy Areas are superseded by Draft PPS 21, this forms a completely circuitous argument, and since Draft Plans are already in existence, but superseded, it will be many years before any new Special Countryside Areas are designated. MAG advises that this process is sufficiently convoluted to make it unacceptable and unlikely to encourage sustainable development in the countryside.**

3.00 Overview of Policies and Commentary

3.01 The document indicates that it relates to sustainable development in the countryside; MAG advises that it therefore should state as a principal objective "to maximise the use of existing built heritage" before considering replacement.

3.02 Whilst acknowledging the importance of the Northern Ireland countryside as a multi-faceted asset, MAG advises that the policy objectives seem to concentrate on facilitating development rather than conserving and benefiting the character of the countryside.

3.03 The draft PPS indicates that there is concern about the numbers of planning approvals in the countryside – indeed the reason for having this policy at all is that planning in the past led to a proliferation of houses that were detrimental to the rural qualities which encourage tourism; these policies and their implementation did not prioritise the preservation and enhancement of landscape character and the policies which led to the construction of "single houses in the countryside" encouraged people to be principally dependent on individual car ownership. MAG advises that whilst the policies may have met a rural need in some cases, in others the resulting dwellings were simply occupied by commuters to cities and towns.

3.04 MAG advises that whole new categories of development are facilitated by the draft Policy which became applicable immediately upon publication. Many policies which had contributed to the concerns expressed in PPS 21 had been removed in draft PPS14. In spite of its expressed concerns, draft PPS 21 reinstates those policies and removes significant protection afforded by Green Belts / Countryside Policy Areas turning much of Northern Ireland from a blanket "Green Belt" to a blanket "Rural Remainder". MAG advises that using Planning Policy Statements as a reactionary region-wide planning measure produces reactionary planning applications which are unrelated to rural landscape context or rural need. With specific reference to Policy CTY 1, Paragraph 5.3, this policy, like all others in the PPS should not be reactive, but should aspire to an agreed objective for sustainable development in the countryside to be achieved regardless of pressure.

3.05 MAG advises that if the policy were to be revised to emphasise the retention of local identity by encouraging adaptation of existing buildings, this will also encourage the development of skilled local labour and that this in turn will stimulate economic growth because our countryside will remain a pleasant place to visit, work and live in.

3.06 Specific comments relating to Policies are as follows:

3.07 CTY 1: Development in the Countryside:

MAG advises that this should state at the outset that there will be a presumption in favour of retention of existing buildings, as PPS 14 did.

3.08 CTY 3: Replacement Dwellings:

MAG advises that this policy needlessly states that there is a presumption in favour of retaining listed buildings, because that is clearly identified elsewhere in the relevant planning policies and legislation. However, MAG advises that the lack of a forthright statement on retention of existing buildings means that there is now considerable pressure on non-listed traditional buildings. Sustainable development must be reflected in a clear statement of preference for reuse and adaption over replacement. In some cases location for reuse/adaption will not be pertinent unless accompanied by a greater element of self-sufficiency rather than dependence for management on centralised services. This policy states that replacement proposals are to be assessed relative to the importance of the existing building in the countryside. MAG advises that policies should be specific and should in this instance specify a measure of assessment of importance of the existing building in the landscape.

MAG advises that most vernacular buildings are NOT "an important element in the landscape" if that is taken to mean that they are prominent features. Almost by definition, vernacular buildings sit modestly in their setting and are almost invisible from critical viewpoints, which is why they are easily accommodated in the visual landscape and should be retained as useful assets.

The paragraph on "other dwellings" suggests that permission will be granted for demolition and replacement even though all external structural walls are substantially intact. MAG advises that these are the very buildings which have the potential to sustainably be kept and re-used. A presumption against demolition of any existing building capable of re-use should be the starting point. This would be more in keeping with PPS 6. If the recommendations of this paper are accepted, buildings in the countryside would require conservation area consent to demolish.

No reason is given for excluding agricultural buildings from reuse as dwellings. If this is an attempt to stop the change in use from buildings currently used for agriculture, then this should not be stated in the past tense.

MAG advises that "modern living requirements" is not a meaningful or measurable description. The objective for PPS 21 should include the reappraisal of development proposals which involve unsustainable living standards, to encourage a transition to living requirements for sustainable development. This policy must aim for sustainable living provision.

MAG advises that the policy does not explain why replacement is important. In UK Government policy (as in Italy and elsewhere) replacement is seen as detrimental. Replacement is not sustainable practice; reuse and adaptation is. Existing buildings should not be demolished; they should be incorporated into the proposal. MAG advises that this policy as drafted does not help the retention of existing buildings. PPS 21 must clearly state a presumption in favour of retention and a presumption against replacement of any buildings.

3.09 CTY 4: Conversion and Re-use of Existing Non-Residential Buildings: This should include re-use of existing residential buildings, saying "re-use of existing buildings".

There is no need for the word 'exceptionally' with regard to several dwellings in one building. That is sustainable practice.

MAG advises that all schemes should be required to benefit a sustainable countryside. If that is the case, there will be no measure of 'sympathetic' required. If planning permission is clearly stated to favour retention / reuse/adaption, then there is no need to state second sentence in 5.23.

3.10 CTY 5 : Social and affordable Housing (& CTY15): MAG advises that there should be no exceptions for social and affordable housing. All development must meet all the exacting requirements for sustainable design and enhancing the countryside (and not marring the setting of settlements).

The limit to such developments was formerly 8, so this has been considerably increased to the figure of 14. The initiation of this increase appears to be from the Semple Report into Affordable Housing.

Guidance suggests that the site be "adjacent to or near" a settlement of no more than 2250 people and gives a hierarchy of location including "close to" and "in close proximity to". These terms are imprecise and open to interpretation. This is provision for additional housing on the edge of settlements or in dispersed rural communities (yet to be defined) but this may not satisfy strictly rural need. It may simply enlarge settlements beyond the criteria used to define these settlement limits in Area Plans which were debated, often extensively, in Public Inquiries and Examinations. MAG advises that the sudden potential to relax development limits will not be beneficial to the provision of social/affordable housing, particularly when at the hearts of many settlements, well within the development limits, there lies dereliction. It would be more appropriate to create policies (and legislation if required) to tackle dereliction and underuse of buildings and sites within existing development limits.

3.11 CTY 7: Dwellings for Non-Agricultural Business Enterprises
Principles of sustainable development would favour mixed-use and enterprise (even on a small scale) and this should be instrumental in policy statement.

3.12 CTY 8: Ribbon Development:
It is stated that land sterilisation and access are problems of ribbon development. CTY 8 does not protect against these.

3.13 CTY 9: Residential Caravans and Mobile Homes
The 'planning and environmental considerations for a permanent dwelling' have not been stated.

3.14 CTY 10: Dwellings on Farms
Planning Policy Statements are blanket documents covering the whole of Northern Ireland. This PPS has not demonstrated that there is any continuing need for new dwellings on farms. Farm employment is less, so the need for new dwellings should not be more. Any need for new dwellings is separate from a continuing need for improvement of dwellings on farms.

3.15 CTY 13: Integration and design of Buildings in the Countryside (& CTY 14):
In order to be applicable, it should be stated why traditional buildings have evolved in this manner (eg. shelter, energy, land use etc). In order to understand the sustainable aspect of their location, the self-sufficient context of their being must also be stated. Traditional patterns reflect a self-sufficient lifestyle and if the principle of sustainable development is to be encouraged, this must be understood in policy terms. This is further discussed below and an option for possible implementation is considered in Paragraph 3.16.

3.16 Policy PSU 1 Community Needs (in the Planning Strategy for Rural Northern Ireland) could be revised to encourage sustainable development in the countryside. This would offer an opportunity to recognise "Low Impact

Development Making a Positive Contribution" to ensure that exemplars of sustainable living may be permitted.

The revision of this policy might read: "To allocate sufficient land to meet the anticipated needs of the community, in terms of health, education and other public facilities, including low impact development making a positive contribution to the countryside.

Changing circumstances determine the requirement of land to meet the needs of the community in terms of health, education and other public facilities including low impact development making a positive contribution to the countryside. With the possibility of rationalisation and further privatisation of services, emphasis will be placed upon making the best possible use of existing sites. Should circumstances require that new sites are needed, land will be identified by individual site assessment or through the process of preparing a development plan.

Proposals for low impact development making a positive contribution to the countryside will require both a planning application and related management plan which must cover all development comprehensively. An annual monitoring report will be required to be submitted to the planning authority to show that the objectives of the development are being met and the positive benefits described in the proposal are being provided."

Additional information may be provided as follows:

"Piecemeal proposals will not be acceptable.

The purpose of a management plan is to show what positive contribution will be made. The management plan will include, among other requirements, targets to help provide evidence as to whether the objectives are being met. The monitoring method will also need to be set out, i.e., what recording system is being put in place to monitor progress together with a clear statement of how the project will be reversible insofar as new buildings can be assisted in biodegrading without any adverse landscape impact or be removed to restore the land to its original or a more bio-diverse state in the event of the project not meeting the objectives of the approved management plan, which would be a condition of continuing use of the development.

Failure to meet the targets in the plans may lead to enforcement proceedings to remedy the breach and ultimately could require the removal of all structures associated with the proposal."

MAG advises that further detailed guidance is available, including establishment of trust bodies, etc. and may be required if such a policy revision is to be acceptable and rigorously enforceable. Additional monitoring resources may be required and these may be more readily available locally following RPA / Planning Reform.

Information is available in the Joint Unitary Development Plan for Pembrokeshire, Pembrokeshire County Council (Adopted 26th June 2006) and Pembrokeshire Coast National Park Authority (Adopted 24th May 2006)

3.17 CTY 14: Rural Character:

Many new buildings in the countryside will involve "ancillary works" that may damage rural character. The majority of these ancillary works will be permitted development not therefore requiring planning permission and not therefore able to be controlled or managed by the planning system. Visibility splays, which are excepted in this clause, are an example of that impact and the removal of hedges and boundaries is not classified as development, therefore outside the control of the planning system. This is not acceptable. If a Northern Ireland Countryside Conservation Area were to be designated, additional controls would be required to assist with implementation of the intention of this policy.

Part of the sustainable future of the countryside is its use for recreational purposes, which often include walking, cycling and horse riding. Much of the network of minor roads which serves the countryside is unsuitable for vehicles travelling at the speed limit of 60 miles per hour (approximately 100 km/h). Pedestrians, cyclists, horse riders move relatively slowly on most minor roads and are known to be a lethal combination with motor vehicles travelling at or near the speed limit. Part of the strategic planning for a sustainable future in the countryside throughout Northern Ireland should be the provision of multi-use pathways adjacent to all roads, minor or major. Walking, cycling or riding are all sustainable in the countryside, yet it is presently unsafe to walk, ride or cycle on the majority of roads in the countryside. Instead of discussing entrance treatments and visibility splays, which are designed for the sole purpose of vehicular traffic ingress and egress, the PPS 21 should require development proposals to include multi-use pathways along frontages designed to be linked so that in the longer term, safe access on foot, hoof or cycle is encouraged alongside fast moving vehicular traffic. Clearly this would be a significant investment over many years, but for that reason it is important to include provision now to assist the process. Demands for multi-use paths would be greater in some areas than in others and MAG advises that the process could be gradually implemented if it becomes policy now.

3.18 CTY 16: Development relying on Non-Mains Sewerage

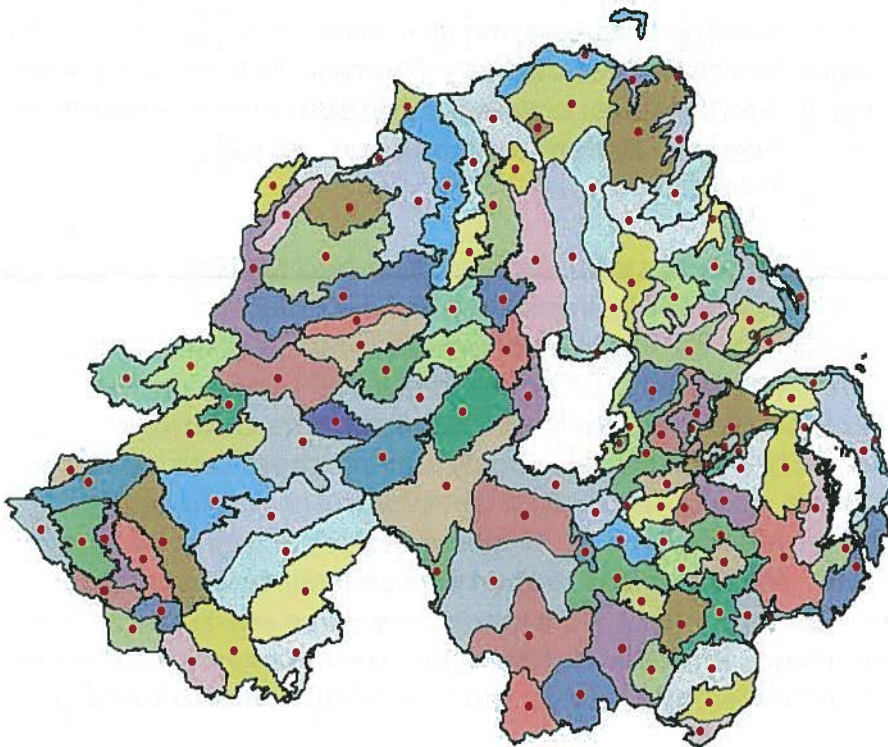
MAG advises that this Policy should be removed; it is dealt with competently under other regulations. A simple general statement or condition should be applied to all permissions saying (as is stated for Building Regulations) that applicants should ensure that all relevant legislation in respect of protection of water, air and land must be observed in addition to planning legislation.

4.00 AN OPPORTUNITY

4.01 The Northern Ireland Landscape Character Assessment 2000 series includes detailed descriptive maps and gives professional guidance on suitable and unsuitable locations of future development in the countryside. The 130 Landscape Character Assessments cover the whole of Northern Ireland and

provide a detailed guide to the location of sustainable development in the countryside which would allow such development to occur without damage.

4.02 A revised draft of PPS 21 should not base assessments of future development opportunities in the countryside on development plans (Area Plans), which are incomplete and in various stages of adoption and whose Countryside Policy Areas have in the main been overridden by the immediate precedence given to draft PPS 21. Instead, a revised draft PPS 21 should use the Department's existing complete and excellent series of Landscape Character Assessments as a basis for implementing Sustainable Development in the Countryside.



4.03 Map of Northern Ireland's existing Landscape Character Assessments

4.04 The countryside has already been fully assessed by the Department's existing Landscape Character Assessments. The value of this completed work is immense in understanding our countryside and in assessing opportunities for new development across Northern Ireland.

4.05 It is recommended that resources be made available, as part of the completion of PPS 21 for adoption, for any necessary updating of The Northern Ireland Landscape Character Assessment 2000 (NILCA) to ensure that it reflects current circumstances, with additional detail being provided if necessary and that NILCA becomes the principal environmental document upon which the final PPS 21 relies. This would root PPS 21 in a professional, credible assessment of the specific value of the Northern Ireland countryside in all its variety and create additional certainty for development proposals, moving the language of PPS 21 from loose and general opinion to measurable fact.

5.00 CONCLUSION

5.01 MAG advises that in the current Review of Public Administration (RPA) and the continuing Reform of the Planning System, the publication of draft PPS 21 should be the last in the system of complex interlocking and interdependent documents, all with different timescales, some immediately applicable, others ten years in waiting, all using different language (undefined) to say sometimes the same thing and sometimes different things, significantly open to interpretation and often misleading.

5.02 MAG advises that an important part of the Reform of the Planning System should rationalise the documentation by specified dates and stop the current centralised system which produces reactionary Planning Policy Statements which lead to large numbers of applications, causing confusion and damaging the reputation of the current Planning System for timeliness, efficiency, communication and consistency.

5.03 MAG advises that if the Policy for Architecture and the Built Environment for Northern Ireland is to be successfully implemented, flexibility must be maintained at the level of place making, the local level, which offers diversity and characterises Northern Ireland itself (as noted in our 130 Landscape Assessment areas). Designation of the Northern Ireland Countryside as a Conservation Area would allow local diversity within a high quality environment and does not stifle development. Instead, it would ensure that development would occur sustainably and in the right locations as measured in the existing NI Landscape Character Assessment. MAG advises that any necessary overarching policy documents, such as Planning Policy Statements, must use measurable, defined language rather than loose, undefined statements and expressed aspirations which depend solely on opinions and can lead to confusion and misinterpretation at all levels.

5.04 MAG advises that varying interpretations of undefined statements which are not measurable can and do lead to many legal challenges, affecting the overall efficiency and effectiveness of the Planning System and therefore of the country itself.

5.05 MAG advises that resources be made available, as part of the designation of the proposed Northern Ireland Countryside Conservation Area, for any necessary updating of the Northern Ireland Landscape Character Assessment 2000 (NILCA) series to ensure that it reflects current circumstances, with additional detail being provided if necessary and that NILCA becomes the principal environmental document upon which the Countryside Conservation Area relies. This would root the conservation area in a professional, credible assessment of the specific value of the Northern Ireland countryside in all its variety and create additional certainty for development proposals. MAG advises that the 130 Landscape Assessment Areas should be respected during the process of local involvement in community planning required by the Planning Reform Order (2006) and that as part of community planning, regular reviews of the Landscape

Assessments be undertaken so that they remain an up-to-date principal source for the management and operation of the Northern Ireland Countryside Conservation Area.

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.**

**MAG Chair
Barrie Todd**

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30 March 2009

APPENDIX 1

COMPARISON OF AIMS AND OBJECTIVES OF PPS 21 WITH PPS 6 POLICIES ON CONSERVATION AREAS

A1.1.00 Aim and Objectives of Planning Policy in the Countryside

A1.1.01 "The aim of PPS 21 is to manage development in the countryside

- **in a manner consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025;**

(In this context, the "strategic objectives of the Regional Development Strategy for Northern Ireland are defined in "Shaping Our Future" as follows:

"the four objectives of sustainable development:

- *Social progress which recognises the needs of everyone;*
- *Effective protection of the environment;*
- *Prudent use of natural resources; and*
- *Maintenance of high and stable levels of economic growth and employment."*

*DRD (Northern Ireland) Regional Development Strategy, "Shaping Our Future"
September 2001 Chapter 3, "Vision and Guiding Principles, page 22.)*

and

- **in a manner which strikes a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities."**

A1.1.02 "The objectives of PPS 21 are:

- **to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community;**
- **to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;**
- **to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity; and**
- **to promote high standards in the design, siting and landscaping of development in the countryside."**

A1.2.00 Conservation Areas – A Concept with Relevance to the Countryside

A1.2.01 "Conservation Areas have been on the statute books since the Civic Amenities Act of 1967. This legislation was substantively the outcome of an initiative by the Civic Trust, which in the early years of its existence had reflected growing concern about the impact of insensitive development on the historic built environment."

Conservation Area Management in Wales, Matthew Griffiths and Sam Romaya, The Civic Trust for Wales, Cardiff University Department of City and Regional Planning, November 2000

A1.2.02 "...significant concern has been expressed by many about development trends and the enhanced pressures being exerted on the countryside, particularly in view of the Executive's commitment to sustainable development."

DoE Northern Ireland Draft PPS 21 Paragraph 5.4, October 2008

A1.2.03 "Great importance is attached to the preservation of the existing character and appearance of such areas allied to the promotion of their economic well-being."

DoE Northern Ireland PPS 6 Chapter 7.2 March 1999

A1.2.04 "Where any area is for the time being designated as a conservation area special attention shall be paid to the desirability of preserving or enhancing its character or appearance"

Planning (NI) Order 1991, Article 50 (5)

A1.3.00 Comparison of PPS 21 Aim & Objectives 6 with PPS 6 Conservation Area Policies

A1.3.01 The policies of PPS 6 which apply in a conservation area in Northern Ireland are examined against aim and objectives expressed in PPS 21 for sustainable development in the countryside.

Conservation Area Policy	PPS 21 aim and objectives	Compliance of Conservation Area Policy with PPS 21 Aim and Objectives
POLICY BH 12 New Development in a Conservation Area		
the development preserves or enhances the character and appearance of the area	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, preserving or enhancing the character can assist with all four objectives
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, there is no difficulty in balancing environmental and community needs – this is clarified in the amplification and justification section 7.4 of PPS 6 "The Department does not wish to stifle development in conservation areas. The emphasis will be on the careful control and management of change."

	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, preserving or enhancing the character and appearance of an area helps to sustain vibrant communities
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, preserving and enhancing does conserve and protect an area
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?	Yes, careful control and management of change can assist with sustaining the economy
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, preserving and enhancing the character and appearance and careful control and management can create high standards of design, siting and landscaping
the development is in sympathy with the characteristic built form of the area	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, being in sympathy with the best of the characteristic built form of the area can assist with all four objectives
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, building in sympathy can help to balance protection of the countryside and support local communities
	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, careful control and management of change can help to manage growth in the countryside to meet the essential needs of a vibrant rural community
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, being in sympathy can help to conserve and protect the landscape and natural resources
	Does the policy enable the planning authority to facilitate development necessary to achieve	Yes, working in sympathy with characteristic built forms can facilitate development

	a sustainable rural economy including appropriate farm diversification and other economic activity?	necessary to achieve a sustainable rural economy. Unsympathetic development would not assist a sustainable economy.
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, sympathetic development will meet high standards of design, siting and landscaping. Unsympathetic development will not create high standards.
the scale, form, materials and detailing of the development respects the characteristics of adjoining buildings in the area;	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, respecting characteristics of adjoining buildings will meet RDS objectives
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, respecting characteristics will enable a balance to be struck between protection of the countryside and the support of local communities.
	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, sustainable patterns of development can be met by respecting characteristics of adjoining buildings and meeting essential needs of vibrant rural community.
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, respecting local characteristics will help to conserve and protect the landscape and natural resources.
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?	Yes, the economy will be sustained by respect of local characteristics. Lack of respect, by contrast is not sustainable
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, respecting local characteristics sets high standards. Lack of respect encourages unacceptably low standards of design, siting and landscaping.
	the development does not result in environmental problems such as noise, nuisance or disturbance which would be detrimental to the particular	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?
Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?		Yes, rural communities could not tolerate environmental problems

character of the area;	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, sustainable development that meets essential needs could not tolerate environmental problems.
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, conserving and protecting the landscape and natural resources would not tolerate noise, nuisance or disturbance.
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?	Yes, no sustainable economy could tolerate environmental problems, noise, nuisance, etc.
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, by ensuring that environmental problems are not caused, high standards will be promoted.
important views within, into and out of the area are protected;	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, protection of important views within, into and out of the area will assist with meeting all four RDS objectives.
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, there can be a balance between protecting the countryside (views) and supporting local communities.
	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, sustainable development and meeting essential needs of vibrant rural communities is assisted by protection of views.
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, views are one of the natural resources of the rural area and their protection helps to meet this objective of PPS 21.
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy	Yes, the protection of important views helps to sustain a local economy – people like to go there, work there, live there

	including appropriate farm diversification and other economic activity?	
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, protecting important views is an essential part of good design, siting and landscaping.
trees and other landscape features contributing to the character or appearance of the area are protected;	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, the protection of trees and other landscape features helps to meet all four RDS objectives
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, protecting the countryside's trees and other landscape features can help to support rural communities.
	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, trees and other landscape features help to support development meeting essential community needs.
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, protecting trees and other landscape features helps to conserve and protect the landscape and natural resources.
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?	Yes, protecting trees and other landscape features which contribute to the character or appearance of the area helps to sustain the economy by making better places to live and work.
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, protecting trees and other landscape features helps to foster high standards of design, siting and landscaping.
	the development conforms with the guidance set out in conservation area documents	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, the Landscape Assessments will support rural communities and by indicating areas where environmental damage will not occur will allow a balance between support of communities and the need to

		protect the countryside.
	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, the Landscape Assessments will assist in managing growth to achieve appropriate and sustainable patterns of development that meet essential rural community needs
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, the Landscape Assessments indicate which areas can accept development without it becoming excessive, inappropriate or obtrusive.
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?	Yes, the Landscape Assessments indicate good management practice and which areas can accept development.
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, using the Landscape Assessments will help to encourage high standards in design, siting and landscaping.
Conservation Area Policy	PPS 21 aim and objectives	Compliance of Conservation Area Policy with PPS 21 Aim and Objectives
POLICY BH 13 The Control of Advertisements in a Conservation Area		

The Department will not normally grant consent for the display of advertisements in or close to a conservation area which would adversely affect the character, appearance or setting of the area or which would be detrimental to	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, the refusal to consent to advertisements which would adversely affect the character, appearance or setting of an area, or which would be detrimental to public safety helps to meet all four RDS objectives
	Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?	Yes, avoiding adversely affecting the character, appearance or setting of the area helps to both protect the countryside and supports rural communities.

public safety	Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?	Yes, the essential needs of the vibrant rural community do not include adverse impacts on character, appearance or setting of their area because of advertisements.
	Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?	Yes, protecting the countryside from adverse impacts on the character, appearance or setting of the area helps to conserve the landscape and protect it from excessive, inappropriate or obtrusive development.
	Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?	Yes, facilitating development necessary to achieve a sustainable rural economy includes protecting the countryside from adverse impacts on character, appearance or setting of their area because of advertisements, thereby protecting it from excessive, inappropriate or obtrusive development.
	Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?	Yes, protecting the area from adverse impacts on character, appearance or setting of their area because of advertisements, helps to protect it from excessive, inappropriate or obtrusive development, thereby fostering high standards of design, siting and landscape.

Conservation Area Policy	PPS 21 aim and objectives	Compliance of Conservation Area Policy with PPS 21 Aim and Objectives
POLICY BH 14 Demolition in a Conservation Area		

The Department will normally only permit the demolition of an unlisted building in a conservation area where the	Is the policy consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland 2025?	Yes, the retention of buildings which make a material contribution to the character and appearance of the countryside is a sustainable method of management. The control over demolitions is an
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<p>building makes no material contribution to the character or appearance of the area. Where conservation area consent for demolition is granted this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording the building before demolition.</p>		<p>important part of managing sustainable development in the countryside and meeting the objectives of the RDS.</p>
	<p>Does the policy strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities?</p>	<p>Yes, the opportunity to retain buildings which make a material contribution to the character and appearance of the area helps to balance the need to protect the countryside while supporting rural communities.</p>
	<p>Does the policy enable the planning authority to manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community?</p>	<p>Yes, the essential needs of the vibrant rural community can help to be met by the retention of buildings which make a material contribution to the character and appearance of the countryside.</p>
	<p>Does the policy enable the planning authority to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution?</p>	<p>Yes, the retention of buildings which make a material contribution to the character and appearance of the countryside helps to conserve the landscape and natural resources of the rural area and protect the area from excessive, inappropriate or obtrusive development.</p>
	<p>Does the policy enable the planning authority to facilitate development necessary to achieve a sustainable rural economy including appropriate farm diversification and other economic activity?</p>	<p>Yes, buildings which make a material contribution to the character and appearance of the area will also assist in achieving a sustainable rural economy as they can be imaginatively used as part of farm diversification and other economic activity.</p>
	<p>Does the policy enable the planning authority to promote high standards in the design, siting and landscaping of development in the countryside?</p>	<p>Yes, the retention of buildings which make a material contribution to the character and appearance of the countryside assists with setting and maintaining high standards of design, siting and landscape, by assisting the integration of new development.</p>

A1.3.02 By examination of the above tables, it is confirmed that Conservation Area status and policies comply with and fulfil the aim and objectives of draft PPS 21 and are therefore the appropriate measures with which to manage the Northern Ireland countryside.

A1.3.03 Instead of the introduction of PPS 21, therefore, MAG advises that the countryside (i.e. all areas outside the development limits of settlements) be designated the Northern Ireland Countryside Conservation Area.

A1.3.04 MAG also advises that the conservation area guidance be the Northern Ireland Landscape Character Assessments published by the Department in 2000.

APPENDIX 2

A2.1.00 SUMMARY OF THE NORTHERN IRELAND LANDSCAPE CHARACTER ASSESSMENT (NILCA) 2000

A2.1.01 The Northern Ireland Landscape Character Assessment 2000 series includes detailed descriptive maps and gives professional guidance on suitable and unsuitable locations of sustainable future development in the countryside. The Landscape Character Assessments cover the whole of Northern Ireland and provide a detailed guide to the locations in the countryside which would allow sustainable development to occur without damage.

A2.1.02 Northern Ireland countryside planning policy should not base assessments of future development opportunities in the countryside on development plans (Area Plans), which are incomplete and in various stages of adoption and whose Countryside Policy Areas have in the main been overridden by the immediate precedence given to draft PPS 21. Instead, designation of the Northern Ireland Countryside Conservation Area should use the Department's existing complete and excellent series of Landscape Character Assessments as a basis for implementing Sustainable Development in the Countryside.

A2.1.03 The countryside has already been fully assessed by the Department's existing Landscape Character Assessments. A study of any of the 130 separate assessments indicates the value of this work in assessing opportunities for new sustainable development across Northern Ireland.

A2.1.04 MAG advises that resources be made available, as part of the designation of the proposed Northern Ireland Countryside Conservation Area, for any necessary updating of the Northern Ireland Landscape Character Assessment 2000 (NILCA) series to ensure that it reflects current circumstances, with additional detail being provided if necessary and that NILCA becomes the principal environmental document upon which the Countryside Conservation Area relies. This would root the conservation area in a professional, credible assessment of the specific value of the Northern Ireland countryside in all its variety and create additional certainty for development proposals.

A2.1.05 *MAG advises that the 130 Landscape Assessment Areas should be respected during the process of local involvement in community planning required by the Planning Reform Order (2006) and that as part of community planning, regular reviews of the Landscape Assessments be undertaken so that they remain an up-to-date principal source for the management and operation of the Northern Ireland Countryside Conservation Area.*