



Response to Consultation

Date: 05 March 10
Consultation: PPS 7 Draft Addendum: Safeguarding the Character of Established Residential Areas

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide 30,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background

The Northern Ireland Federation of Housing Associations recognises the importance of well planned development especially in residential areas. Our members, working with the Planning Service, make a positive contribution to the living environment of their tenants through the construction of well planned developments which are sensitive to the local area. Our members within the Housing Association movement in Northern Ireland are committed to sustainability in development which should enrich their tenant's lives and through this enhance the social wellbeing of our society.

General Comments

The Federation fully supports the aim of the Regional Development Strategy for mixed and balanced communities and of PPS12 for a mix of dwelling types and sizes. We believe planning policy should aim to for a pattern of development that enhances community sustainability by enabling residents to find suitable accommodation as their needs and preferences change (e.g. at different stages of life) without having to move far away from their established social networks.

We therefore consider it regrettable that some residential areas have lost their "balance" in the sense that the predominant landuse is now small flats or houses in multiple occupations, mostly created by sub-division of former family homes. Such large-scale physical change can negatively transform the social balance of an area by depleting the stock of family dwellings and threatening the sustainability of related social infrastructure such as primary schools.

The Federation understands that the draft addendum to PPS 7 is intended to safeguard residential areas from the syndrome described in the previous paragraph but we feel the draft would go too far in the other direction by denying permission for development that would add a degree of diversity and consumer choice to relatively uniform residential areas which often offer a very limited range of types and sizes of dwelling.

Specific Comments

Policy LC 1

Do you agree that the addendum has adequately reinforced existing policy on the protection of local character, environmental quality and residential amenity within established residential areas, villages and similar settlements? If no please state your reasons.

In our opinion, the proposed addendum to PPS 7 would not be consistent with the general thrust of wider government policy (expressed in the Regional Development Strategy, the Sustainable Development Strategy, the Regional Transport Strategy and PPS12) that generally favours an increase in residential density on grounds of environmental sustainability.

NIFHA recognises that the Planning Service has responsibility for protecting the local character, environmental quality and residential amenity within established residential areas but we consider that it would be extremely difficult for development to satisfy the proposed new criteria. Existing development patterns would therefore tend to be “fossilised” and the potential for creating more mixed and balanced communities would be lost.

The proposed policy is particularly restrictive in that all three criteria: LC1(a), (b) and (c) would have to be satisfied before planning permission could be granted.

LC 1 (a) ‘the proposed density is not significantly higher than that found in the locality’

For the reasons outlined in our general comments, site-specific increases in density may enhance, rather than detracting from, the social or physical character of an area. Each planning application involving higher residential density should be evaluated on its own merit in the context of suitably worded local plans.

The Federation can point to examples of housing association schemes which have been sensitively and successfully incorporated into established residential areas of lower density. It would be regrettable if such developments were ruled out in future.

LC 1 (b) ‘The pattern of development is in keeping with the overall character and environmental quality of the existing residential neighbourhood’

It is unclear how the pattern of development will be determined to be in keeping with the existing environment. The guidelines need to be clearer about how this will be interpreted and decided upon. A break in a pattern of dwelling types and sizes to one which although is different complements the existing residential neighbourhood is preferable to designing neighbourhoods that follow a fixed regimented pattern. The building of a number of different sizes and types of dwellings in residential areas encourages a variety of family

groups to inhabit these areas which in turn may aid community development in those areas.

LC 1 (c) 'all dwellings are built to a size not less than those set out in Annex D'

NIFHA agrees with the minimum size regulations. Our members build to high design standards which aim to optimise the long-term usefulness of our tenants' homes.

Policy LC 2

Do you consider that the Department has proposed appropriate planning criteria to ensure existing buildings converted to flats or apartments will sympathetically harmonise with adjacent properties and maintain or enhance the overall character and environmental quality of existing residential areas? If no please state your reasons.

As with LC1, we believe the draft policy LC2 would make it almost impossible for large buildings (residential or non-residential) to be converted into smaller homes. Not only is each of the six criteria quite demanding in its own right but **all** of the criteria would also have to be satisfied before planning consent could be granted. This type of "one size fits all" policy could have the unintended consequence of leaving large old houses to gradually run down, with negative consequences for the surrounding homes and the wider areas.

The Federation suggests that, as part of Local Development Plan formulation, capacity studies should propose and publicly consult on upper limits for the proportions of homes that may be converted over the relevant plan period.

Policy LC 3

Do you support the Departments efforts to encourage greater use of permeable paving in new residential developments in order to reduce the risk of flooding from surface water run-off? If no, please state your reasons.

NIFHA strongly supports the policy intention of LC 3 but believes its wording must be made effective. A policy of giving "favourable consideration" to permeable paving would not prevent developers from continuing to use impermeable surfaces, even when permeable alternatives would be perfectly feasible and economic.

Our members are acutely aware not only of the misery that flooding can bring to their tenants but also the substantial cost of repairing the property. The housing association movement aims to build sustainable homes to high environmental standards and believes it is imperative that this very modest policy proposal should be effectively applied across the whole development industry.

Submitted by: Christopher Williamson, Chief Executive