



Community Places Response to Draft Addendum to Planning Policy Statement 7, Safeguarding the Character of Established Residential Areas

Summary of Key Points

1. Local Communities Welcome Investment and Development

Local communities want investment and development in their area. They want development that is well planned and that will strengthen and sustain their areas as well as providing long-term housing that will meet the needs of people at different stages of their lives. Communities also want to be pro-actively engaged and consulted on developments impacting on their areas so that they can support and welcome good developments.

2. Mix of Densities, Apartment Types and Sizes to Meet Different Needs

It is important that new apartment developments in our villages, towns and cities are made up of a mix of apartment sizes and types, not just one and two bedroom apartments, to encourage families and others to settle down in an area and help build stronger communities. Clear standards should be established in this policy to ensure a sustainable mix and range of densities or apartment types and sizes in new developments. However, the draft policy does not introduce any new requirement for a mix of apartment types and sizes in new developments.

3. Character

The Policy LC1 proposal only repeats existing policy. The wording should be much stronger in order to protect the character of established residential areas. New development should be required to make a positive contribution to townscape and be in keeping with the character of the surrounding area.

The terms used in the policy should be consistent so that it can be clearly interpreted. In policy LC 1, the terms “established residential area”, “locality” and “neighbourhood” are all used, creating confusion. Other terms also require clarification, for example, what is meant by “significantly higher” densities.

4. Policy for Arterial Routes

Not all arterial routes are the same and so the proposed one size fits all policy for arterial routes is not suitable. Some arterial routes are suited to higher density development while others are not. Under current proposals in the Draft Addendum it will be possible to build significantly higher densities on arterial routes than

those of the surrounding area, and there would be no minimum size of apartments required. Instead of a one size fits all approach, there should be local plans for apartments.

5. Local Plans for Apartment Development and Better Design

Planning should ensure that the right type of development takes place in the right area. Rather than allowing higher density development on all arterial routes, local plans could be developed which set out areas that are appropriate for higher density development and include controls on the number of apartments that will be permitted in an area overall. These plans should be developed through meaningful and resourced consultation with local communities.

Higher density development only works when it is well designed. The policy should set out standards for minimum sizes, storage, open space, mix of size, type and layout.

6. Cumulative Impact

The social and environmental impacts that a number of similar developments may have on a local community and its character should be taken into account in making planning decisions. Planning policy should develop a consistent method of measuring the cumulative impact of proposals on the character and fabric of an area. This is not considered in the draft proposals and they should be further developed to incorporate these issues and to strengthen the Minister's circular on cumulative impact.

7. Monitoring

Monitoring would inform local planning and policy development. Planning Service should know where and how many apartments are being built in an area as well as the number of bedrooms and floorspace provided in each apartment. Planning Service currently does not hold this information and this is not considered in the draft proposals.

8. Permeable Paving

The policy proposed in the Draft Addendum states that Planning Service will favour the use of permeable paving, but does not place any requirement on developers to use it. The wording of this policy is weak and is unlikely to be enforceable. The policy on permeable paving contained in the Draft Addendum should be strengthened to make it effective.

9. Minimum Size Standards

Minimum size standards should ensure that all new apartments are spacious enough to meet modern requirements and to create homes where people want to stay. Under the proposals in the Draft Addendum, the minimum size standards are smaller than those used elsewhere (such as Dublin) and do not apply to new apartments in town and city centres and arterial routes or to flat conversions. These standards should apply to town and city centres, arterial routes and flat conversions to make sure that long-term homes are created in all areas.

10. Management

Apartment buildings must be well managed if they are to provide a good quality living environment. There may be a role for other stakeholders to work alongside Planning Service to ensure apartments are properly managed.

11. Other Issues

Other issues must be addressed to ensure better planned development in residential areas. These include the impact on water and road infrastructure and the need for adequate access to public transport to serve apartment developments. The impact of Houses in Multiple Occupation (HMOs) on the character of an area also needs to be addressed. The introduction of third party appeals would allow communities to have an equal opportunity to influence development in their areas. Better enforcement and enforcement fines that do more to deter breaches of planning control would also help secure better quality development.

Community Places Response to Consultation Paper on Draft Addendum to Planning Policy Statement 7, Safeguarding the Character of Established Residential Areas

1. Introduction

Community Places has been working on the issue of safeguarding the character of established residential areas for some time. In July 2009, we published a report¹ setting out recommendations on how planning policy could help create better apartment developments and protect the character of established residential areas. We met with the Minister of the Environment Edwin Poots MLA and with Department of the Environment officials to discuss this report. We welcome the response to these issues contained in the proposed policy. However, as set out below, a number of issues have not been fully addressed.

2. Mix of Densities, Apartment Types and Sizes to Meet Different Needs

Community Places suggests that more emphasis should be placed on ensuring a greater mix of densities, apartment types and sizes within the Addendum. Policy should ensure a mix of sizes of apartments suitable for families and adequate high quality private and shared open space. The changes proposed in the Draft Addendum to PPS 7 would still allow developers to build up to 25 of the same sized apartments within a given area without the requirement to ensure a mix of units or sizes. All developments should create longer term living opportunities. The provision of a greater range of sizes and types of houses and apartments which meets the needs of people at different stages of their lives encourages people to settle in an area, form stronger links and contribute positively to building social capital and the stability of the community. This planning policy should establish clear standards to ensure a sustainable mix and range of housing units.

3. Character

In order to enhance the character of established residential areas apartment developments should be required to make a positive contribution to townscape and be sensitive to the character of the area surrounding the site in terms of locally distinctive design, scale and use of materials. Although the Draft Addendum reinforces what is set out in other policies and guidance, it does not set any stronger policy tests.

¹ Planning Stronger Communities (July 2009)

Where large areas of local character have been demolished for development developers should be required to consult extensively with the neighbouring communities prior to submitting applications for planning permission.

Where possible, the re-development of existing buildings for residential intensification should be favoured in place of demolition. The justification to policy LC 1 of the Draft Addendum states that,

“proposals for the sympathetic re-use of existing buildings, as opposed to proposals involving demolition and redevelopment will continue to be looked at more favourably”.

This point should be included within the main body of the policy.

The terms used in the policy should be consistent so that it can be clearly interpreted. In policy LC 1, the terms “established residential area”, “locality” and “neighbourhood” are all used, creating confusion. Other terms also require clarification, for example, what is meant by “significantly higher” densities.

4. Policy for Arterial Routes

Under current proposals in the Draft Addendum consultation document, on arterial routes it will be possible to build significantly higher densities than those of the surrounding area, and there would be no control on the size apartments in these areas. Arterial routes are designated through the Area Plan. On arterial routes a large, high density apartment development can completely change the character of the area. All arterial routes are not suitable for high density development and policy should ensure that inappropriate high density developments are not approved in these areas.

5. Local Plans for Apartment Development and Design Standards

Local plans for apartment development would ensure that the right type of development takes place in the right area and would create greater certainty for developers and for local communities. Apartment development areas should be identified through Area and Subject Plans and these should set out the areas that are appropriate for higher density developments. Detailed guidance suitable to each area could be developed as part of local subject plans for apartment developments, including controls on the number of apartments that will be permitted in an area overall. These plans should be developed through meaningful and resourced consultation with local communities.

Specific design guidance is necessary to address common problems associated with apartment design, such as a sense of being "cut off" from the surrounding area due to poorly designed layouts and design that is out of keeping with the surrounding area, as well as security and safety problems. Planning Service should take this design guidance into account during its decision-making process. Guidance should include criteria in relation to design appropriate to the area and environmentally friendly design. Guidance on apartment developments should specify standards of open space, including for example, requirements for permeable green space, play areas, bin storage and cycling and walking provision. Other standards should be introduced in addition to size standards to ensure that any new apartments or dwelling units provide a good quality living environment. These standards could include:

- an adequate amount of storage;
- adequate private and open space;
- environmentally friendly design;
- apartments being designed so they are not cut off from surrounding communities; and
- mix of size and type.

6. Cumulative Impact

Planning policy should develop a consistent method of measuring the cumulative social and environmental impacts that a number of similar developments may have on a local community and its character. It should emphasise that in assessing cumulative impact the Planning Service will consider the cumulative impact of existing developments, those which have permission and those that are currently the subject of valid but determined applications. While there is a planning circular denoting the importance of taking cumulative impact of proposals into account, Community Places recommends that this should be incorporated into policy and that the negative impacts collective development may have on the local character should be taken into account in making planning decisions. This is not considered in the draft proposals and they should be further developed to incorporate these issues and to strengthen the Minister's circular on cumulative impact.

7. Monitoring

The Planning Service should monitor the number of received, approved and completed applications for apartment developments. This should include information on the number of bedrooms and overall floorspace. Monitoring would inform local planning and policy development. There is no policy in the Draft Addendum to address the provision of monitoring the number of applications received, approved and completed for apartments.

8. Permeable Paving

Policy LC 3 of the Draft Addendum states that,

“favourable consideration will be given to using permeable paving within new residential developments”.

This policy encourages the use of permeable paving but does not create any requirement for paving within new residential developments to be permeable. It should be strengthened to indicate that all paving in new residential developments should be permeable, unless evidence is provided by the applicant to demonstrate that this is impractical. In addition, we have concerns that some of the comments contained in the justification to this policy will be given little weight as they do not form part of the main policy. For example, paragraph 2.18 states that,

“proposals involving the replacement of front gardens with hard surface car parking areas will be resisted”

We suggest that this should be moved to the main body of the policy in order to strengthen it.

9. Minimum Size Standards

The minimum size standards for new dwelling units, set out in Annex D of the policy, are much smaller than those used elsewhere. The justification to this policy states that, “it is critical that all new housing units are sufficiently spacious, particularly if they are to prove attractive to families with children on a long term basis.”

However, we do not believe that the standards introduced by this policy would result in sufficiently spacious and attractive residential properties. The table below compares the size standards proposed in the Draft Addendum with those used in Dublin.

Type of Dwelling Unit	Minimum Size in Draft Policy	Minimum Apartment Size in Dublin
Bedsit/One bedroom unit	30 m ² - 55 m ²	55 m ² minimum
Two bed unit	60 m ² - 75 m ²	80 m ² – 90 m ²
Three bed unit	75 m ² - 90 m ²	100 m ² minimum
Four bed unit	90 m ² -110 m ²	-

Under the proposals set out in the Draft Addendum, these size standards would not be applied to new apartments built in city and town centres or along arterial routes and would not be applied to buildings that are converted into apartments. In our opinion minimum size standards should be applied in all these circumstances, as it is important that new development creates long term-homes in these areas.

10. Management

Apartment buildings must be well managed if they are to provide good a good quality living environment. Responsibilities of the management company/management agent can include care and upkeep of communal areas such as hallways, entrance foyers, car parks, shared areas of open space, bin storage areas, water and sewerage management systems in the building, repairs to the fabric of the building, operation of lifts etc. This includes payment of electricity and other bills for communal areas. They may also be responsible for insurance of the building and security. Poor management can result in substandard living conditions. There may be a role for other stakeholders to work alongside Planning Service to ensure apartments are properly managed. This could be a condition of planning approval or an Article 40 agreement with Planning Service. For example, Policy HMO 7 of the HMO Subject Plan for Belfast which deals with large scale purpose built student accommodation states that a development of 50 units is considered to be "large scale" and that planning permission will only be granted for large scale purpose built student accommodation where:

"Provision is made for management of all accommodation. This may require an Article 40 agreement with Planning Service."

The introduction of similar conditions on apartment developments should be considered.

11. Other Issues

Other issues must be addressed to ensure better planned development in residential areas. These issues include the impact on water and road infrastructure and the need for adequate access to public transport to serve apartment developments. Due to the higher density of apartment developments in comparison to traditional residential accommodation, their impact on existing infrastructure can be much greater. Development should only be allowed when the necessary infrastructure is in place. Issues in relation to Houses in Multiple Occupancy also need to be addressed and the changes that this kind of development can bring to an area. The introduction of third party appeals would allow communities to have an equal opportunity to influence development in their areas. Better enforcement and larger enforcement fines that do more to deter breaches of planning control would also help secure better quality development.

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