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## Memorandum

To Office of the Deputy Prime Minister  
For the attention of Phil Grant, Planning Policies Division (A)

Cc George Ferguson, President  
Nick Gillibrand

Date 11 December 2003

From RIBA Planning Policy Group

Subject Consultation on the Draft Planning Policy Statement (PPS) 7 –  
Sustainable Development in Rural Areas

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## Memorandum

### 1.0 Introduction

The RIBA will comment in detail on this draft in the spirit of the government's objectives. The comments will focus around two subjects: the removal of the provisions of the middle part of paragraph 3.21 of the current PPG7 – the country house exception; and the restrictions on the re-use of existing barns.

### 2.0 Government Objectives and Key Principles

2.1 The RIBA supports the broad objectives of this PPS. In particular and with reference to the comments that follow, we will refer to:

the “aim.. to sustain and enhance the distinctive environment, economy and social fabric of the English countryside for the benefit of all”;

“i. To raise the quality of life and environment in rural areas through the promotion of:

- thriving, inclusive and sustainable rural communities;
- sustainable economic growth and diversification;
- good quality, sustainable development that respects local distinctiveness and the intrinsic qualities of the countryside; and
- a high level of protection for our most valued landscapes and environmental resources.”

2.2 The RIBA broadly supports the Key Principles of National Planning Policies and in particular and with reference to the comments that follow we will refer to:

1.i “.. effective protection of the environment.. and maintaining high and stable levels of economic growth and development.”

1.iv “New development away from existing settlements, or outside areas allocated for development in development plans, should be strictly controlled; in particular, isolated new houses in the countryside require special justification.”

1.vi “All development in rural areas should be well designed, in keeping and scale with its location, and sensitive to the character of the countryside and local distinctiveness.”

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### 3.0 Effective Ban on New Country Houses

- 3.1 The RIBA supports the general objectives for housing set down in paragraphs 9 and 10. We also support the principles set down in paragraph 11. In the last sentence in paragraph 11, however, assessment of special justification is directed to Annexe A. Annexe A provides detailed guidelines for the assessment of justification of new dwellings in the countryside. Each section only provides for justification on agricultural grounds or other rural-based enterprises. This justification is, in all cases, based on individual occupant activity-based functional need and general financial viability. Application of this policy specifically excludes any other kind of residential development. Indeed, the only reference to “*special justification*” for a new house is a direction to Annexe A. In any normal reading of these clauses not only has the definition of how an exception to policy for a country house might be assessed (PPG, paragraph 3.21) been removed (as noted in paragraph 7 of the introduction) but also the possibility of any such exception is actively discouraged. This will be treated as an effective ban on new country houses by local authorities.
- 3.2 In a letter to Mr Nigel Anderson of Robert Adam Architects of 16 September 2003, Yvette Cooper MP, Parliamentary Under Secretary of State, responding to a research document sent previously (and attached to this consultation) on the subject of the economic benefits of country houses, stated that “*if.. the policy exception for isolated, high quality country houses is removed this would simply mean that any planning application for such a house would have to be considered on the same terms as any other proposed new house in the countryside. It would be for the applicant to provide special justification for his or her proposal; a high quality design and an improvement to the local environment could still be put forward in support of an application.*” The wording of the PPS does not support this statement; while there is always a case for an exception, the direction to Annexe A severely limits anything other than an activity-based agricultural use. Furthermore, the removal of the original conditions for the assessment of the exception carries with its own message: that the government does not support the case for new country houses. This message is reinforced by the statement from Keith Hill MP from the ODPM on 15 September 2003 that: “*we believe the exception which supports the building of large country houses in the open countryside is inconsistent with our desire to protect the countryside and promote sustainable communities*”.
- 3.3 The RIBA submits that the government in the draft PPS7 has, to all intents and purposes issued a ban on the construction of new country houses. Our members have first hand evidence of this interpretation by a number of local authorities. We believe that this is a retrograde step for the countryside and for British architecture.

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### 4.0 New Country Houses

#### 4.1 Cultural Context

We must look at the background to the country house and its relationship with the countryside. The country house and its parkland are one of Britain's major artistic achievements. They are admired worldwide and are one of Britain's most important tourist attractions. Building of country houses slowed down significantly after the Second World War. Indeed, in this time a total of approximately 600 were totally demolished and a larger number were partially destroyed. While the cultural and economic background to these country houses may have changed, there is no logical reason in principle why buildings of similar quality should not continue to make a significant artistic contribution to the countryside. Throughout the history of the country house changes in demand and social background have taken place. The aristocratic power base of the seventeenth century is not the same as the early twentieth-century house of the successful entrepreneur. Today, there is unquestionably a demand for new country houses and the background has changed to a desire to live on, improve and enjoy Britain's agricultural land or, in some cases, rebuild lost houses in their surviving parkland. There is no reason to prevent the gradual replacement of our lost houses with high quality new buildings unless this contradicts the objectives and key principles of the draft PPS. The RIBA contends that it would not.

#### 4.2 Good Design and Local Distinctiveness

Planning consents for new country houses under the present provisions of paragraph 3.21 specify a house of the "*highest quality*" and "*truly outstanding in terms of its architecture and landscape design*" that "*proper account [be] taken of the defining characteristics of the local area*". This is an unusually high standard and an encouragement to the best of British design. For this reason, we can assume that the 18 houses permitted since the introduction of the provision in 1997 are good examples of modern British architecture and landscape design. Such development would then be "*well designed, in keeping and scale with its location, and sensitive to the character of the countryside and local distinctiveness.*" As part of one of our best-known building and landscape types it would also "*provide good quality ... development that respects local distinctiveness and intrinsic qualities of the countryside.*"

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### 4.3 Agriculture and Employment

It is accepted that agricultural incomes are at an historic low point and that there are significant problems with the economic maintenance of the countryside. Substantial grants are required from the state and the European Community to maintain the countryside and many of these are directed towards improving the quality of the countryside and removing commercial agricultural pressures. Improved mechanisation and low agricultural incomes have also resulted in a major loss of rural employment. This information is elaborated in the attached research document from the University of Reading *Private Investment in the Countryside*. Proposals for new country houses include substantial parkland and are usually (but not always) part of farms. The standard and expense of these houses and their parkland ensure that owners will bring significant income to the countryside from outside sources – usually business of some form. This represents a substantial investment in the countryside. Commercial pressures are, consequently, removed from the agricultural enterprise and there is a desire to improve the landscape not only for parkland but also generally as part of the enjoyment of the property. The planting of parkland and general improvement and removal of commercial pressures from farmland provide significant benefits to indigenous and wild flora and fauna. Such proposals in turn increase local employment – a typical 600 acre farm might employ two workers, a country house, park and farm might employ and house six or more local workers, usually from the unskilled and semi-skilled group most disadvantaged by unemployment.

### 4.4 PPS7 Objectives and Principles and New Country Houses

When these factors are taken into consideration, new country houses can “*sustain and enhance the distinctive environment, economy and social fabric of the English Countryside for the benefit of all,*” and promote “*thriving, inclusive and sustainable communities*”, promote “*sustainable economic growth and diversification*” and promote “*a high level of protection for our most valued landscapes and environmental resources.*” New country houses and parks can provide an “*effective protection of the environment, a prudent use of natural resources*” and contribute to “*high and stable levels of economic growth and employment.*” Furthermore, such developments would “*help to maintain and manage the countryside*” and “*continue to do so*” (paragraph 15) and, if we also consider the points in our paragraph 4.3 above, “*continue to protect the countryside for the sake of its intrinsic character and beauty [and] the diversity of its landscapes and wildlife*” (paragraph 16).

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### 4.5 Disadvantages

These benefits in some cases are not of a large scale relative to the countryside as whole while some are significant. It would be prudent to examine any potential disadvantages. In the context of the PPS, these would be:

1. their location away from established settlements;
2. their impact on the countryside and
3. the exclusive nature of occupancy.

We will discuss each in turn.

#### 4.5.1 Distance from Settlements and Sustainability

It is not necessary for these houses to be set at a distance from existing settlements although, in the context of the environmental and investment advantages, some might be so located. Given the likely small number of such houses (provided proper controls are maintained, see 4.7 below) the energy deficit in terms of vehicle movement would be far outweighed by the environmental benefits of extensive planting and the loss of intensive farming (such measures which are generally part of applications can be conditioned or included in planning obligations).

#### 4.5.2 Impact on the Countryside

While much has been made by objectors of the potential for such houses to spoil the countryside, in practice the impact of a few hundred square metres on several hundred hectares is minimal. Indeed, it is an accepted feature of the British countryside that good quality country houses are important features and points of focus in themselves. If we assume that each house is some 200 square metres on two floors (a large country house), if all 600 lost houses were to be replaced the total area of land occupied by building would be 60 hectares across the nation. This is not even the size of a small farm. If we take the average parkland created to be 20 hectares per dwelling (a small park) this would result in an improvement, removal from agriculture and enhanced wildlife habitat of some 12,000 hectares. In practice with farming benefits it would be many times this figure. It is salutary to note that on the present rate of 18 consents in six years, it would take 194 years to replace the country houses lost in the 58 years since the war.

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### 4.5.3 Exclusivity

It is inevitable that the investment required for such houses will lead to occupancy by relatively wealthy owners. The increase in individuals with such wealth is a consequence of the UK's economic success. Indeed, the inclusion of the wealthy is as much a part of a "*living*", "*vibrant*" and "*inclusive*" countryside as any other social group. The conversion of this taxed wealth into an investment in high quality design and an improved landscape, together with employment and the removal of subsidised agriculture, is a benefit to the community in itself. It is also a tradition of the British country house that interested visitors are allowed access on a regular basis. Public access to parkland is often a condition of consent for new county houses and, as such schemes represent some of the best of design by today's architects, such access conditions could be encouraged or conditioned.

### 4.6 Architecture

Properly controlled by careful wording in the new PPS, a continued definition of the conditions for an exception for new country houses and parkland would also continue to offer an important design platform for living architects. Country houses in the past have been one of the most important test beds for new design. Removed from normal commercial pressures and restrictive context and funded by patrons, recent consents for new country houses have shown the diversity and quality of British architecture and given opportunities for experiment and the development of the art. British architecture is recognised for its quality worldwide, new country houses would continue to be an important aspect of one of our national assets.

### 4.7 Improved Conditions for Exception

Setting new conditions for the country house exception would also allow for additional benefits in line with the objectives and principles of the PPS. Not only do new houses offer increased local employment, but they often include housing for workers. In view of the rural housing shortage, it would be possible to include a condition for the provision of number of affordable or social housing units. The conditions for high quality design and landscape should be retained and access and other community benefits could be included.

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### 5.0 The Need to Retain Conditions for a Country House Exception

The RIBA supports the need to “*strictly control new house building (including single dwellings) in the countryside*” (paragraph 10.ii) and agrees that “*new development away from existing settlements.. should be strictly controlled.*” Furthermore, we support the view that “*isolated new houses in the countryside require special justification.*”(paragraph 11) We would, however, most strongly urge the Secretary of State to reset and redefine the criteria for the allowance of an exception for the construction on new country houses. To do otherwise would result in the *de facto* termination of a tradition after a short renaissance of so much promise, would have positive benefits to the countryside, would contribute the quality of British architecture and be in accordance with key government objectives and principles for PPS7 and the British countryside.

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### 6.0 Conversion of Rural Buildings

- 6.1 The RIBA supports the principles in paragraphs 18 and 20 for the conversion of rural buildings for business use and the criteria for assessing such buildings to be appropriate for conversion.
- 6.2 The RIBA questions the extent of limitation on conversion implied in paragraph 19. Many barns are important historic buildings, are often in isolated rural locations and redundant. They are often unsuitable for business use due to their location, problems of access, the nature of structure and cost of repair. In such cases the only viable use will be residential. If no exception for historic structures were made the result would be the decay and even total loss of an important aspect of our rural heritage. These buildings are often particularly vulnerable to vandalism or theft of historic materials when redundant due to their isolated location. Furthermore, the lack of commercial value would not only discourage owners from even the most basic maintenance, possible listing under these conditions could lead to covert destruction by owners. It is the view of the RIBA that, if the discouragement and lack of opportunity for residential conversion is maintained, paragraph 19 represents a serious threat to our architectural heritage in contradiction to the objectives of PPG15.
- 6.3 While allowance of an exception would not conform to PPG3, the numbers are small and inappropriate development could be strictly controlled by the introduction of restrictions on such development to listed structures or structures of acknowledged historic interest and structures with substantial historic fabric remaining. Introducing conditions on landscape and boundary treatment could control the impact of the converted building on the countryside.
- 6.4 The RIBA would strongly urge the Deputy Prime Minister to include an allowance for the conversion of barns to residential use under strict controls, with the strict criteria being design quality and appropriateness of conversion/extension. If there is no reference to such an allowance, this paragraph in its present form is a direct threat to historic barns in the countryside.

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### Planning Policy Group

#### Remit

To assist with formulation and implementation of RIBA planning and urban design policy and to advise on future policies, with the broader objective of putting design at the centre of the planning process.

#### Objectives

- 1 Update of PPGs and supporting policies
- 2 Influence the way design is dealt with in the planning process, especially in planning appeals procedure
- 3 Influence the way design is dealt with by local authorities
- 4 Respond to the November 2000 Urban White Paper and subsequent planning green papers, policies etc.

#### Liaison

- 1 Office of the Deputy Prime Minister
- 2 Government-funded organisations such as CABE, English Heritage, English Partnerships, the Planning Inspectorate
- 3 Other bodies such as BURA, RTPI, RICS, UDAL
- 4 Local liaison via RIBA regions to Local Authorities and RDAs
- 5 RIBA members

#### Membership

Robert Adam, Robert Adam Architects, Winchester  
Richard Baker, Eastleigh Borough Council, Hampshire  
Andrew Hanson, Confederate Architects, London  
Alfred Munkenbeck, Munkenbeck and Marshall, London  
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