

Urban Regeneration and Community Development Policy Framework

Comments by

Northern Ireland Environment Link

25 October 2012

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 57 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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NIEL welcomes the opportunity to respond to the *Urban Regeneration and Community Development Policy Framework* Consultation.

General Comments

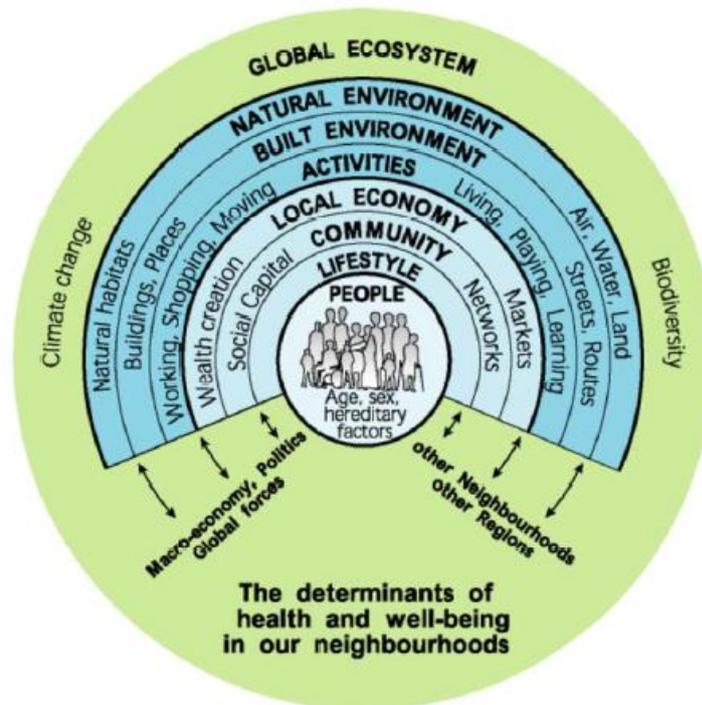
We would specifically welcome the inclusion of the following environmental references within the draft Framework document:

- That the Framework will be informed by the DSD's strategic objectives including to *Provide access to decent, affordable, sustainable homes*' (Section 1.8);
- Acknowledgement within Policy Objective 2 - *To Strengthen the Competitiveness of our Towns and Cities, for the requirement for a 'sustainable transport system'*. We believe this is an essential requirement if government and wider society is to reduce the many negative impacts of our car-dependency culture;
- Inclusion within Policy Objective 3 – *To Improve Linkages between Areas of Need and Areas of Opportunity* of key actions around the need for 'physical regeneration of interface areas, including environmental improvement..' and 'sustainable brownfield redevelopment, including the protection and improvement of buildings and open spaces, preservation of historic and cultural heritage, and development of community gardens, allotments and green spaces';
- The inclusion within Policy Objective 4 – *To Develop More Cohesive and Engaged Communities* of a key action 'strengthening networks and cross-interface schemes to develop positive community responses to social, economic and environmental problems'; and
- Commitment that in formulating the Framework and in taking forward actions from it, DSD will take account of and link with a number of policies and strategies led by other departments that have an impact on urban regeneration and community development including the: *Sustainable Development Strategy; Sustainable Development Implementation Plan 2011 – 2014; the Architecture and the Built Environment for Northern Ireland* policy; the *Public Health Strategic Framework* (currently under development); and the *Regional Development Strategy 2035*.

Proposed Improvements to the Draft Framework

Overall Comment

NIEL would however wish to see a greater overall reference and corresponding actions throughout the document relating to the importance of the natural environment in the context of helping to improve the well-being of citizens. Without emphasis placed on a healthy environment, we believe that human health and wellbeing cannot be maximized. We therefore believe that the promotion and protection of the natural environment should be 'up front and centre' in any proposed policy and enabling objectives for urban regeneration and community development in Northern Ireland. The importance of the environment is best summarized in the diagram below entitled *The Determinants of health and well being in our neighbourhoods* and is we believe, the context upon which the entire Framework should be based.



Source: Barton and Grant, University of the West of England, 2006 (Origins in the *Bruntland Report* and in the work being undertaken by the World Health Organisation on healthy cities).

Specific Comments:

- We are disappointed that there are no references to climate change or climate change adaptation within the document. This is a worrying omission given that the Northern Ireland government, as a requirement of the UK Climate Change Act is currently developing a Climate Change Adaptation Programme in order to encourage the public, private and voluntary sectors to understand and plan for the impact that climate change will have on their work, businesses and services. The 2008 Act also sets out the duty for Northern Ireland Departments to lay programmes before the Northern Ireland Assembly, including, the objectives of the department in relation to adaptation to climate change; the department's proposals and policies for meeting those objectives; and the time-scales for introducing those proposals and policies. We believe therefore that a strong link is required between the Framework and the Northern Ireland Climate Change Adaptation Programme;
- It is surprising that the Framework makes no mention of the Wildlife and Natural Environment Act 2011, nor more specifically, the Biodiversity Duty contained within it. This Act outlines the additional responsibility of all Departments and public bodies (including Local Authorities) to promote and embrace nature conservation when carrying out their daily tasks. The Act highlights the important role that all Government Departments can take in furthering the conservation of biodiversity when undertaking their functions. There is now a requirement for all departments to protect and maintain biodiversity on their own lands and those they have influence over; and to look for opportunities to enhance or restore biodiversity, or provide an educational input to others about biodiversity. The duty also extends to all activities carried out by a public body including the provision of grant aid to other bodies

and/or individuals where there is a relevance to biodiversity. In meeting this statutory duty, public bodies must take account of the Northern Ireland Biodiversity Strategy (currently under review) published by the Northern Ireland Executive and the lists of priority species and habitats published and maintained by NIEA. We believe therefore that the 2011 Act and Biodiversity Duty should be enshrined within the framework. Assistance in meeting this statutory duty should be sought from DOE who are currently compiling guidance designed to assist public bodies through their work in developing policies, strategies and functions; administering the planning system; managing their land and buildings; developing infrastructure; engaging with business and the public; conducting research and managing information; making decisions about procurement; and implementing economic, environmental and social programmes.

- While we welcome the fact that the Framework provides linkages to a number of policies and strategies, a number of important strategies have been omitted from the list. These include the Regional Transportation Strategy, and the Active Travel Strategy. We believe that strong integration is required with the Active Travel Strategy in particular to ensure that active travel choices become part of everyday life as an accessible, cheaper and healthier way to move around. The design of the urban environment to include green space and features that encourage safe active transport will be important factors contributing to more healthy lifestyles and therefore requires greater emphasis.
- Given that Framework is designed to set out for DSD and its partners, clear priorities for urban regeneration and community development programmes, both before and after the operational responsibility for these is transferred to councils under the reform of local government, we would expect to see a greater reference and linkage to the principles of Community Planning within the document.