

A Strategic Planning Policy Statement for Northern Ireland

Comments by

Northern Ireland Environment Link

29th April 2014

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 65 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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Northern Ireland Environment Link (NIEL) welcomes the opportunity to comment on the Strategic Planning Policy Statement for Northern Ireland (Draft) (SPPS). NIEL, in general, commends the Department for much of the content in the Subject Planning Policies, but we would suggest that some changes need to be made to the opening sections of the document, in terms of the purpose of planning and its core principles. This document is vital to the underpinning of an efficient and fair planning system in Northern Ireland, in the interest of the public good, and it is important that these vital elements (purpose and core principles) are carefully considered and consistent.

NIEL would like to see the document setting a clearer vision for what Northern Ireland should look like in the coming decades (in the context of sustainable development). This is an opportunity to produce something aspirational that can set the trajectory for society in Northern Ireland, and NIEL would urge the Department to grasp it.

Consultation Question 1

The Purpose of Planning

Do you think the purpose of planning set out in this SPPS is appropriate for Northern Ireland?

NIEL agrees that the purpose of planning should be centred on furthering sustainable development and improving wellbeing. As such, the planning system should act for the public good. The concept of public good is, however, a complex one, and is in need of definition in the document. For example, in the context of the sustainable development definition in Paragraph 3.3, public good should include future generations as well as present.

NIEL expresses concern around the interpretation of the concept of Sustainable Development within the draft SPPS – often what is described is concerned with sustaining economic development, which is something very different. Too often there is a blurring of the distinction between sustainable development and sustained economic growth. The text, as it currently stands, promotes this misunderstanding and leaves the system vulnerable to misinterpretation and exploitation. NIEL strongly recommends that the purpose of planning, in furthering sustainable development and improving wellbeing, is clarified at the beginning of the document and that there is a consistent application of it throughout. To leave the document as it is currently is, is likely to cause confusion in practice.

Paragraph 1.1 subtly encourages the pursuit of economic and social priorities, and seems to relegate environmental concerns (which consistently appear third in this list). Paragraph 1.3 again emphasises economic growth, stating that the planning system is required to unlock economic potential. In the context of finite resources, we must recognise that there is an inherent tension between growth and sustainability – the link between the economy and the natural environment should be recognised and the environment prioritised in such a way that future resource is not compromised. The planning system should facilitate a truly sustainable way forward for Northern Ireland: “To address the paradox between economic growth and sustainability, we must find a way to balance the two and allow them to coexist. This balance may be possible not only by developing alternative energy resources, but mostly by dramatically containing the growth spirals of economy, population and depletion of resources, reducing them to a state of near stasis... This balancing act

must also be accompanied by a deep understanding that the nature of the problem is the tension between short-term growth and long-term survival... Whichever path we take, the first step to achieving any sort of balance between economic growth and sustainability is to put more weight on sustainability and less on economic growth”¹. While sustainable development is defined in Paragraph 3.3, this definition is too often compromised by the emphasis placed on short-term growth, rather than truly taking the needs of future generations into account.

Consultation Question 2

Core Planning Principles

Do you think the Department has identified suitable core planning principles for the reformed two tier planning system?

NIEL promotes the concept of ecosystem services across government. The environment should be valued because it provides the basis for life, and it delivers a massive range of services to society, from provisioning (for example, food and fuel), to cultural (for example, historic identity and sense of place). We would suggest, therefore, that a key core planning element should deal with securing and promoting the goods and services that flow to society from the environment. Essentially, the planning system in Northern Ireland should act as a safeguard for ecosystem services².

The wording of the core planning principles could be improved to make them less passive – for example, words like ‘observing’, ‘supporting’ and ‘enhancing’ could be stronger.

Consultation Question 3

Furthering Sustainable Development

Do you think that this is an appropriate approach for this core planning principle?

NIEL supports the principle of Furthering Sustainable Development (as defined in Paragraph 3.3). However, this seems to be undermined by the paragraph ‘On the economy’ (3.4), which comes first after the definition, and is concerned with ‘promoting economic recovery’. Promoting economic recovery is a relatively short-term goal for Northern Ireland, and as such is not appropriate for this strategic, long-term, document. Sustainable development is about long term strategic thinking (on a generational scale), and this is not reflected in this paragraph.

The paragraph ‘On the environment’ (under 3.4) mentions ‘working towards halting the loss of biodiversity’. NIEL would emphasise that halting the loss of biodiversity is a legally binding EU target,

¹ <http://www.elsevier.com/connect/economic-growth-and-sustainability-are-they-mutually-exclusive>

² http://www.bedsandlutongreeninfrastructure.org/pdfs/pres/GI_and_ecosystem_services-TCPA_article.pdf

and would encourage stronger wording than 'working towards'. Recognition of this is shown under the Natural Heritage section (paragraph 6.145), but should also be reflected here.

NIEL strongly welcomes aspects of mitigating and adapting to climate change in the SPPS – the planning system has a significant role to play in this, in, for example, promoting sustainable transport through better integration of land and transport planning, and avoiding development in areas with increased vulnerability to the effects of climate change. In this context, we welcome the recognition of the need to work with environmental processes (and not against them). We would emphasise that this requires an understanding of environmental processes, and would encourage the Department to interact with experts on issues related to complex environmental systems, where necessary.

Consultation Question 4

Improving Health and Wellbeing

Do you think that this is an appropriate approach for this core planning principle?

NIEL would emphasise that Improving Health and Well-Being has a huge cross-Departmental reach, and would encourage a joined-up approach to fulfilling policy objectives.

In paragraph 3.11, we would suggest rewording: 'Economic growth, provided it is sustainable, can...' changed to 'Economic growth, if sustainable, will...'.

The elements under 'Improving Health and Well-Being' seem unevenly weighted – a lot of emphasis is placed on managing noise and air pollution, while nothing said about water quality (and the EU Water Framework Directive), which is crucial to, for example, drinking water quality. Light pollution is also not mentioned in the document.

Consultation Question 5

Creating and Enhancing Shared Space

Do you think that this is an appropriate approach for this core planning principle?

NIEL is content with the approach to creating and enhancing shared space, and would stress the opportunity to develop green spaces and wild places in doing so.

Consultation Question 6

Delivering Spatial Planning

Do you think that this is an appropriate approach for this core planning principle?

NIEL agrees that the planning system in Northern Ireland should be visionary and enabling (though not at the expense of the precious services that the environment provides to society).

Paragraph 3.31 states that ‘new planning powers will assist in moving planning in this direction’. It would be helpful if there was detail provided on mechanisms for doing this.

Consultation Question 7

Observing a Plan-Led System

Do you think that this is an appropriate approach for this core planning principle?

NIEL agrees that observing a plan-led system is fundamental to the success of the planning system in Northern Ireland. This is, of course, dependant on LDPs being in place – we would encourage this to happen as soon as possible.

We would suggest that the link between LDPs and community plans are highlighted in this section.

Consultation Question 8

Supporting Good Design, Positive Place-Making, and Urban and Rural Stewardship

Do you think that this is an appropriate approach for this core planning principle?

The Department is to be commended for stating that planning permission may be refused solely on design grounds (3.35).

We refer the Department to the NIEL response to ‘Living Places: An Urban Stewardship and Design Guide for Northern Ireland’, submitted on 31st October 2013. We would like to see more weight given to ‘Living Places’ in the SPPS, as a document that gives guidance on what good place-making is based on.

Under paragraph 3.37, guiding principles for good place making in the countryside should include (perhaps under ‘Character’) a mechanism to safeguard against cumulative impact/change. The character of a place may be compromised by incremental change over time as much as by significant individual developments. NIEL would therefore emphasise the need for a ‘strategic eye’ on development in the countryside, and endorses proposals for a Northern Ireland Land Strategy to fulfil this role. Such a strategy should speak to the SPPS and other strategic policy documents (and vice-versa). As with the urban context, we would like to see more weight given to ‘Building on Tradition’ in the SPPS, as a document that gives guidance on sustainable design in the Northern Ireland countryside.

Consultation Question 9

Enhancing Stakeholder Engagement and Front-loading

Do you think that this is an appropriate approach for this core planning principle?

Enhancing stakeholder engagement and frontloading is a positive step for the planning system. NIEL welcomes the demand for a Statement of Community Involvement from councils. This section should, however, specify obligatory pre-application discussion between developers and planners.

NIEL would refer the Department to the Community Planning Manifesto (produced by Community Places), which NIEL endorses.

Consultation Question 10

Enhancing Local Democratic Accountability

Do you think that this is an appropriate approach for this core planning principle?

NIEL welcomes measures to enhance local democratic accountability. We would, however, highlight the need for capacity building in this area, with the forthcoming Code of Conduct being a key document that needs to be in place as soon as possible.

Consultation Question 11

Decision-taking Principles and Practices

Do you consider the decision taking principles and processes outlined above are appropriate for a reformed two-tier planning system?

In guiding decisions, the SPPS should align with other strategic documents for Northern Ireland, and be flexible enough to deal with new strategic documents being produced.

There is a need to produce LDPs urgently if the system is to be genuinely plan-led.

Accountability and transparency in decision-making is to be welcomed.

NIEL agrees with the need for an 'innovative economy' (paragraph 5.1), but we would stress that this is not simply about, for example, construction; it is about true innovation that enables sustainable development as defined in 3.3.

NIEL welcomes proposals for pre-application discussion in an effort to reduce objections to applications and ultimately to facilitate the development of local spaces valued at local community level. Pre-application discussions should make for a more efficient, inclusive and accountable planning system in Northern Ireland. Community views should be brought on board as early as possible in the application process so that they can have a genuine role in shaping their own spaces and places. While it is a positive step that developers are strongly encouraged to engage with local communities at pre-application stage, NIEL would like to see this become a requirement. We support the idea of communities being able to shape projects through the pre-application discussion framework, rather than simply attending information briefings. We would however wish to see some safeguards in place to ensure that any group representing a community is genuinely representative of that community, with a mechanism whereby interests are declared.

We would like to see pre-application discussions achieve the following objectives:

- (a) To provide a framework for real and meaningful partnership work between developers, councils, statutory agencies and communities;
- (b) To enable community planning to reach out to and engage people in all communities;
- (c) To focus the work of community planning on outcomes which make a meaningful difference and on improving the co-ordination and delivery of public services in communities and constituencies.

Clearly pre-application discussion will provide greater opportunity to identify environmental problems with projects, or highlight the need for environmental impact assessment – that will be a key benefit. But within this pre-application discussion framework, NIEL would emphasise the great positive opportunity that exists for the creation of green spaces and wild places during pre-application discussions. Links between health and wellbeing (a core principle in the SPPS) and the wider environment are proven and very important³, and a planning system working for the public good should fully represent the interests of the natural environment (and the richness of the historic environment) in the development of plans to ensure optimisation of community benefits and the flow of vital ecosystem services to local communities. All of this can be enhanced by greater engagement of stakeholders at the pre-application stage, resulting in a higher quality final outcome for everyone. As key stakeholders, the environmental NGO sector would appreciate being involved in these discussions at local government level in the future.

Consultation Question 12

Archaeology and Built Heritage

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Archaeology and Built Heritage?

³ <http://www.bbc.co.uk/news/science-environment-26871970>

With regard to archaeology and built heritage, NIEL recommends that science/research-based conservation should be supported and promoted. Any conservation should be underpinned by an understanding of material/environment interactions.

The explicit link between economy and historic environment is to be welcomed. Correct investment in the built heritage and historic environment can bring great economic opportunity. In this context, we would encourage the ‘meanwhile use’ of historic buildings.

NIEL suggests that the section ‘World Heritage Sites’ should come under the heading of Natural Heritage. Northern Ireland only has one World Heritage Site and it is so designated for its natural phenomena (rather than cultural). Wherever World Heritage Sites are dealt with in the document, there should be clarity on the strength of the World Heritage Site designation in a Northern Ireland context.

Consultation Question 13

Coastal Development

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Coastal Development?

NIEL advocates the need for Shoreline Planning in Northern Ireland (called Shoreline Management Planning in GB). In GB, this has been shown to be an appropriate tool for dealing with complex coastal planning matters and the societal tensions that they can raise (i.e. encroachment of the sea onto land as a result of sea level rise, SLR). It also provides a framework in which to harmonise terrestrial and marine planning systems. For a report on a successful Shoreline Planning conference in Northern Ireland, see here: <http://www.nienvironmentlink.org/cmsfiles/policy-hub/files/documentation/Marine/Shoreline-Planning-for-Northern-Ireland.pdf>.

We welcome the recognition of erosion and coastal processes as an important factor in coastal planning. The difficult issue of managed retreat from the shoreline should be raised in the document as a sign-post to what is likely to be needed in coming decades (in the context of environmental change and SLR). Policies for coastal development should have regard for climate change and SLR.

Paragraph 6.26 – NIEL suggests that the wording be altered to say that coastal areas should be ‘given room’ in response to coastal squeeze – ‘protection’ is ambiguous in this context and may be interpreted as armouring or a form of hard engineering, which is often inappropriate in the context of working with natural processes (a guiding principle of planning under Furthering Sustainable Development, 3.3). Rather, coastal processes should be given room to work naturally along the shoreline (they only become hazardous when in contact with development).

Paragraph 6.28 states that the ‘aim of this SPPS in relation to the coast is to protect the undeveloped coast from inappropriate development’. While NIEL agrees with this, we would emphasise that the developed coast also needs protection against inappropriate development – this is crucial to

sustainable development. Existing development should not mean an automatic 'green light' for new development, especially in the dynamic coastal zone.

Paragraph 6.29 – the term 'sensitive to location' should include the thought of sensitivity to coastal processes (erosion, sediment movement, wave action) in a given location, which could make any development a non-starter. Such coastal hazards should be 'visible' in the planning system and hence should impact on decision-making.

The issue of offshore renewables should be highlighted in the Coastal Development section because these will have on-shore implications, and in fact may often encroach on coastal protected areas. Careful thought will be needed on how the planning system will deal with this problem.

There should be recognition that development and maintenance in the coastal zone will only become more costly as SLR and extreme storm surge events increase. Planning decisions should take into account not only current flood-risk areas, but also projected futures – the coast is a dynamic environment, and the very nature of the dynamics are themselves in transition.

Consultation Question 14

Control of Outdoor Advertisements

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on the Control of Outdoor Advertisements?

NIEL is content with the approach to the control of outdoor advertisements. We would emphasise the need to use enforcement powers.

Consultation Question 15

Development in the Countryside

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Development in the Countryside?

NIEL welcomes the recognition of ecosystem services in the countryside, and the protection of those services for society should be a key concern of the planning system in Northern Ireland.

NIEL welcomes the requirement for councils to bring forward a strategy for development in the countryside – a 'strategic eye' on development in the countryside is key for monitoring cumulative change. NIEL recommends that the Department monitors this across all council areas.

NIEL also commends the Department for recognition of exceptional landscapes in the SPPS, but we highlight the fact that AONBs are not mentioned here. AONBs should be recognised and we would recommend that they are afforded much greater levels of protection in planning terms. In

recognition of the importance of landscape in Northern Ireland, we also recommend that landscape assessments (including capacity and threshold studies) should carry weight in decision making in the planning system.

We would like to see more detail in the SPPS on the issues involved around single dwellings in the countryside (e.g. service provision – power, water, broadband), and greater weight placed on the countryside design guide ‘Building on Tradition’.

There is also a statement needed on agricultural structures in the countryside, given the growth aims of the current Agri-Food Strategy.

Paragraph 6.55 uses the words ‘a positive approach to new development’. We believe this is problematic – there are many ways to regenerate an area and encourage flourishing and growth in rural communities and businesses without resorting to new development. New development should be less of a priority than, for example, re-use and restoration.

We refer the Department to a NIEL briefing note written on PPS21 (see <http://www.nienvironmentlink.org/cmsfiles/files/Publications/PPS-21-Briefing-Note-Final.pdf>) where, in relation to development in the countryside, NIEL recommends:

- Rural housing and other development should be focused within existing and, where need is established, revised settlement limits of our towns, villages and hamlets.
- The provisions within the SPPS should be clarified to ensure that the overall objectives are supported by robust, deliverable policies.
- An appraisal of need should be conducted before a new farm dwelling is permitted. New dwellings should be built adjacent to the principal farmstead and planning conditions should include restrictions on resale.
- The Replacement Dwelling policy must include a presumption in favour of retaining and renovating existing vernacular buildings.
- The Dispersed Rural Community designation should be used only for specific isolated communities with identified needs. Development in these areas should be clustered around existing focal points.

Consultation Question 16

Economic Development, Industry and Commerce

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Economic Development, Industry and Commerce?

In general, there is little regard for the importance of the environment in this section – ultimately, it is the environment, and securing the goods and services that flow from it to society, which will “improve the wealth and living standards of everyone” (paragraph 6.69). This should be explicitly recognised in this section on the economy.

NIEL is concerned that paragraph 6.69 seems to equate “growing a sustainable economy” with “long term economic growth” – these are not the same thing, and recall the concerns noted under Consultation Question 1 around the consistency of interpretation of ‘sustainable development’.

This is followed by the statement in paragraph 6.71 that “the planning system has a role in achieving a vibrant economy”. There is an inherent tension arising here between private and public good. We would again recommend that there be a clear definition on what is meant by ‘public good’, and emphasise that the planning system should act in this interest, rather than in the interest of private developers.

The policy objective (paragraph 6.72) of “ensuring the provision of a generous supply of land suitable for economic development” is also questionable. Land is a finite resource under increasing pressure, and any decision of this kind should be based on a robust Land Strategy for Northern Ireland.

When the outcome of planning applications are based partly on “likely economic benefits” (paragraph 6.80), it is possible that the process will become very complex, and even conjectural in nature. It is difficult, for example, to adjudicate between competing private interests, or to evaluate whether economic activity is actual ‘growth’ or simply displaced from another area of NI. Similarly, paragraph 6.78 states that the system should “adopt a positive and constructive approach in determining applications for economic development”. This seems very open to misinterpretation and exploitation. Rather, NIEL recommends that any decision should be made in line with Development Plans, instead of economic development potential.

In paragraph 6.82, NIEL suggests that the opening sentence should read “adopt a positive approach to sustainable development” – there is no need for ‘economic’ in this sentence because it is already captured within the concept of sustainable development. In the same paragraph, the sentence “Such proposals may occasionally involve the construction of new buildings” is also very open to interpretation. We would recommend that there be a qualifier / caveat for this to ensure that it is not abused.

NIEL supports a ‘town centre first’ approach to economic development, industry and commerce.

Consultation Question 17

Flood Risk

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the emerging planning policy approach on Flood Risk as expressed in PPS 15 Revised (Draft) Planning and Flood Risk?

We refer the Department to the NIEL response to draft PPS15, submitted January 2014.

NIEL would suggest moving coastal-relevant flooding to the ‘Coastal Development’ section of the SPPS.

There should be explicit recognition that the ‘restoration of natural flood plains’ (paragraph 6.92) may necessitate societal retreat / realignment with regard to coastal flooding. NIEL again emphasises that Shoreline Planning is a key tool whereby such realignment can be achieved, dealing with the social, economic and environmental complexities involved.

NIEL emphasises that permitting elevation of land for development on coastal floodplains (paragraph 6.104) ignores erosional and wider coastal processes that should be taken into account by the planning system. Thus, the strictures applied to development on fluvial floodplains should apply equally to coastal floodplains.

NIEL welcomes the inclusion of SuDs (paragraph 6.109) as a positive approach to dealing with flood risk.

Consultation Question 18

Housing in Settlements

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, existing planning policy on Housing?

NIEL recommend that the adaptation and re-use of existing structures should be a policy objective under planning policy on housing.

This section of the SPPS does not make mention of social housing.

Consultation Question 19

Minerals

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Minerals?

Paragraph 6.132 states that “‘sustainable development’ does not prevent us from using and capitalising on such resources”. Who decides this, and on what basis? Even if this statement is followed, sustainable development should have a very real impact on how and where these resources are used.

Paragraph 6.137 includes the objective “to secure the sustainable restoration of mineral sites to a relevant use after working has ceased”. NIEL suggests that this should be stronger than simply ‘relevant use’, but should ensure an appropriate use, preferably for the public good. This could be much more specific / prescriptive.

Consultation Question 20

Natural Heritage

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Natural Heritage?

Once again, NIEL stresses the need for integration of strategic documents in Northern Ireland – this should speak to other documents dealing with Northern Ireland’s natural heritage.

Policy objectives for the natural environment should include the safeguarding of ecosystem services for the good of society. We refer the Department to our response to Consultation Question 2, and again recommend that the safeguarding of the benefits that flow from the environment to society become a core principle for the planning system in Northern Ireland. We recommend there be some process in place whereby the value of natural assets can be assessed and accounted for in the planning system. In contributing to this, we would suggest that Landscape Character Areas could be a useful tool in the planning system.

We would like to see recognition in the SPPS that protecting natural heritage is not simply about managing designated sites, but managing all of our land area to deliver ecosystem services across the whole landscape – this is ultimately what will protect the natural heritage, rather than focussing on specific designated pockets.

Paragraph 6.155 states that “Adverse impact on landscape and natural heritage can be minimised through careful planning and design”. We would suggest that this sentence sits uncomfortably with the precautionary principle. We cannot design/plan/engineer our way out of every environmental problem when the systems we are dealing with are complex (in the scientific sense), and uninformed management can result in non-linear response (small changes introduced to the system can bring about disproportionate changes in system operation), chaotic behaviour, unintended consequences and perverse outcomes.

NIEL would recommend that the new Seascape character assessment be referred to in this section.

Consultation Question 21

Open Space, Sport and Outdoor Recreation

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Open Space, Sport and Outdoor Recreation?

NIEL is content with the approach for ensuring that open outdoor recreation space is available in towns and cities. NIEL advocates for green infrastructure networks in urban areas, which bring many cross-sectoral benefits in terms of recreation space, but also (for example) active travel routes and flood alleviation schemes. We would welcome recognition of green infrastructure under this section.

Consultation Question 22

Renewable Energy

Do you consider that the SPPS has appropriately reflected and update, in a strategic way, the existing planning policy approach on Renewable Energy?

While NIEL supports the development of the renewable energy sector, we recommend that in assessing any application for renewable energy developments, the potential benefits of any such proposal should be weighed up against the possible negative impacts. We endorse a strategic approach to renewable energy developments, with an eye to monitoring cumulative impacts across the countryside (again, something that would be facilitated by a robust NI Land Strategy).

We note the issue that energy produced offshore needs to come onshore at some location, and that this will often be in our most sensitive, protected, coastal areas. This is an issue that requires considerable thought – ultimately, perhaps a large offshore ring circuit that comes ashore at an existing power station is needed (however, we recognise that this will be a long term goal).

Consultation Question 23

Telecommunications, Public Services and Utilities

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Telecommunications, Public Services and Utilities?

NIEL is content that this section has been reflected appropriately.

Consultation Question 24

Tourism

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Tourism?

NIEL broadly welcomes the sentiments of sustainable tourism articulated in the SPPS. We suggest that looking after the tourism destination (in terms of environmental management and investment) will naturally lead to growth in visitor numbers.

Paragraph 6.218 states that “proposals may occasionally involve the construction of new buildings”. NIEL recommends that this is qualified so that the circumstances under which new buildings may be constructed are given.

We would also suggest that the concept of Natural Capital be recognised in this section – it is Northern Ireland’s Natural Capital resource from which the tourism industry springs.

Consultation Question 25

Town Centres and Retailing

Do you think a 'town centres first' / sequential test is the appropriate policy approach for the location of future retail and other main town centre uses in Northern Ireland?

NIEL is content with the town centre first, sequential test, approach.

Consultation Question 26

Town Centres and Retailing

Do you agree that councils should undertake an assessment of need or capacity for retail and other main town centre uses to inform local development plans?

NIEL agrees that an assessment of need for retail and other town centre uses should inform local development plans.

Consultation Question 27

Town Centres and Retailing

Do you think that councils should prepare town centre health checks as described?

Yes. NIEL recommends that these health checks should include numbers of jobs existing in the town centre.

Consultation Question 28

Town Centres and Retailing

Do you think a 'call for sites' consultation is an appropriate mechanism to assist with site allocations in a local development plan?

NIEL agrees that this is an appropriate approach.

Consultation Question 29

Town Centres and Retailing

Do you agree that 300m from a town centre boundary is an appropriate threshold for a site to be considered as edge of centre?

NIEL agrees that this is appropriate.

Consultation Question 30

Town Centres and Retailing

Do you think 2,500 sq metres (gross) is the appropriate threshold for requiring a proportionate retail impact assessment?

NIEL would question why this figure is used, and suggest that Northern Ireland (because of its smaller scale) should not necessarily follow the same guidelines as other UK jurisdictions.

Consultation Question 31

Town Centres and Retailing

Do you agree with the factors to be addressed as part of a retail impact assessment?

NIEL broadly agrees with these factors.

Consultation Question 32

Transportation

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Transportation?

NIEL welcomes the closer coordination of transport and land use planning as a key mechanism of making transport more sustainable in Northern Ireland.

One of the policy objectives for transportation and land use planning is to promote 'Parking policies that will assist in reducing reliance on the private car and help tackle growing congestion'. NIEL strongly agrees with this objective. However, this was not adequately reflected in, for example, the draft 'Living Places', where easy urban car parking is promoted. Policies that truly decrease our car dependence should be promoted – for example, more compact city re-development.

Consultation Question 33

Waste Management

Do you consider that the SPPS has appropriately reflected and updated, in a strategic way, the existing planning policy approach on Waste Management?

NIEL would recommend that policy objectives should be extended to include the avoidance or minimisation of detrimental effects on landscape (in addition to people, the environment and local amenity).

Consultation Question 34

Implementation and Transitional Arrangements

Do you agree that transitional arrangements as described above are required in the short to medium term?

In Paragraph 7.3, NIEL would recommend the inclusion of strategies or over-arching policy documents currently being developed – for example, NIEA’s Natural Capital paper, and a Land Strategy for Northern Ireland.

Paragraph 7.5 could be stronger than “intends” – thus, “The Department will undertake a fundamental review of the SPPS within 5 years”.

Consultation Question 35

Other SPPS Comments

Do you have any other comments on the SPPS?

As a general comment, some reorganising would be appropriate. For example, coastal flooding comes under ‘Flood Risk’ rather than the new section on ‘Coastal Development’. Coastal flooding is certainly an issue for coastal development, and would sit more comfortably here.

A Land Strategy for NI should be a parallel strategic document for material consideration – optimising the use of our finite land resource for delivery of goods and services from environment to society.

Retrospective planning permission levels in NI have traditionally been high. NIEL would like to see this change under the new two-tier planning system, and indeed question the role of planning policy in setting direction, when retrospective applications are so prevalent.

Consultation Question 36

Interactive Digital Engagement

Do you consider that the provision of the interactive digital consultation document has been a successful initiative?

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