



*Working together for a healthier Belfast*

## **Response to consultation on draft PPS2: Natural heritage**

July 2011

Belfast Healthy Cities welcomes the opportunity to comment on the draft revised PPS2.

Belfast is a designated Healthy City, and a leading member of the World Health Organization (WHO) European Healthy Cities Network, with a strong track record of meeting WHO goals and objectives. Belfast Healthy Cities is a partnership organisation working to create healthy living conditions for all and generate health equity as a strong value in decision making, and responsible to WHO for the implementation of requirements for designated WHO European Healthy Cities. Our focus is on facilitating intersectoral collaboration for health and equity and providing evidence, capacity building and innovative approaches that support this. Key partners include Belfast City Council, Belfast Health and Social Care Trust, Bryson Group, Department of Health, Social Services and Public Safety, East Belfast Partnership, Northern Ireland Housing Executive, PLACE, Public Health Agency, Queen's University of Belfast and University of Ulster. Planning and Local Government Group is also represented on Belfast Healthy Cities' Board of Directors.

Belfast Healthy Cities' office has a staff team dedicated to working with partner organisations to facilitate and support change. The office also acts as the link between the city and WHO, and Belfast currently provides the secretariat to the Network.

Healthy urban environment (HUE) is a core area of our work and focuses on highlighting and demonstrating how a high quality, people focused physical environment can support and improve people's lives, health and wellbeing, while also contributing to environmental protection and economic stability. Our work involves sharing evidence and building capacity among planners and other built environment professionals, and increasingly also demonstrating benefits of a people centred approach to physical and spatial planning.

Our comments are made in light of this rationale, which also stresses that people friendly, healthy environments are a cornerstone of thriving, vibrant communities and economies. However, Belfast Healthy Cities has no expertise in environmental legislation, and will therefore not comment on this aspect of the draft policy.

## **Comments on PPS2**

Belfast Healthy Cities strongly supports the objectives of PPS2. The natural heritage is important in its own right, as a link to history and as the core ecosystem that we are part of. People ultimately depend on the natural environment for survival and access to nature also significantly supports and enhances wellbeing. For example, open and green space provides stress relief and recreation that is vital for mental wellbeing; evidence indicates that just having a view of trees helps people cope better with stress and hospital patients to recover faster. Especially in urban areas, green spaces also provide natural meeting places and serve to strengthen social cohesion. In all cases, nature offers important opportunities for physical activity and play. In addition, biodiversity and a rich natural heritage can be economic opportunities, for example as tourist attractions.

Belfast Healthy Cities believes that it would be important to start from this basis of viewing the natural heritage as an asset in itself when preparing development plans and assessing development proposals. This would support a more wide reaching assessment of the potential advantages and disadvantages of development, which could effectively inform decision making.

Development plans, and in particular the process of preparing these, offer a particularly good opportunity to consider the relative value of natural heritage and of nature sites in general to the long term prosperity and wellbeing of an area. In its current form, PPS2 appears to primarily focus on processes for dealing with individual proposals, and Belfast Healthy Cities would welcome a greater focus and guidance on how to incorporate natural heritage effectively into development plans. For example, this could be done through surveys of current use of natural sites, and of the values and benefits local stakeholders ascribe to them. While this level of detail may not be required in a PPS, a further level of guidance would be important to enable consistency across the region.

This might also support decision making in cases where exceptions to general policy provisions are proposed, ie. where permission is sought for development on protected sites. While we appreciate that such decisions must be made on a case by case basis, we believe it would be helpful if policy outlined more detailed criteria eg. of how the value of a site is calculated. This should take into account non monetary aspects, such as importance for local identity and potential for alternative uses, eg. recreation (for local residents and visitors).

In relation to criteria regard, guidance regarding development not permitted in Areas of Outstanding Natural Beauty (AONBs) go some way towards this. However, Belfast Healthy Cities believes that the scale of development in AONBs should also be strictly controlled, in order to preserve the character of the area. Provisions of this type for urban areas has been made in the Addendum to PPS7, and it may be helpful to include a reference to this effect also in PPS2. We

would emphasise that such controls are not only valuable for environmental and cultural protection, but that safeguarding local unique characteristics can become important for tourism and other economic activity (of an appropriate scale).

Many of the issues outlined here can be effectively highlighted and addressed through assessments that proposals must undergo before decisions are taken. Belfast Healthy Cities has over a number of years developed expertise and experience on Health Impact Assessment (HIA), which is a systematic way of assessing the potential impacts of a proposal on health, equity and wellbeing. Belfast Healthy Cities has also initiated work exploring how a HIA approach, or a focus on people and human health, could be integrated into SEA, and we would be happy to explore this further with Planning and local government group. We are, however, aware that any assessment is labour intensive, and building on this experience, we are piloting a Health Equity in All Policies (HEiAP) approach. This approach builds on HIA, but aims to work with other organisations to support them achieve their aims, in a way that also supports health. The core aim is to maximise available synergies, and also to maximise efficiency by ensuring that potential negative health impacts, which may increase costs to the public purse, are minimised. We would be happy to provide further information on this work as well, should that be helpful.

Belfast Healthy Cities, in partnership with Belfast City Council, Belfast Trust, the Public Health Agency, NIHE and the Belfast Area Partnerships has also developed an indicator set intended to support the monitoring of how regeneration affects health, equity and wellbeing. This framework includes an environment domain, and can be adapted for a wide range of purposes. The core principle applied in developing the set was that it should support an outcome based approach, and therefore the set identifies indicators that help show progress towards those. For example, the headline indicator in the environment domain is investment in green space, coupled with use of green space. These are further linked to other domains, including an economic domain, and the framework therefore enables monitoring of how protection and enhancement of the natural heritage affects not only people, but also the local economy. We would be pleased to provide further information on this indicator set, should that be helpful.

In conclusion, Belfast Healthy Cities believes that safeguarding the natural heritage of Northern Ireland is vital to the long term prosperity and wellbeing of the region. The draft PPS2 outlines basic provisions for this, but could include further steps to integrate natural heritage as a core factor. It would be particularly welcome to see an approach that views natural heritage as an asset, rather than as a set of legislative responsibilities that restrict development.