



Working together for a healthier Belfast

Response to consultation on draft PPS24

April 2011

Belfast Healthy Cities welcomes the opportunity to comment on the draft PPS24.

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. 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.

Enclosed with the response is a recent publication by Belfast Healthy Cities called *Healthy Places: Strong Foundations*, which covers the evidence base for the approach taken in the response. We would be happy to provide further detail or information on any issue highlighted, should that be helpful.

General comments

Due to the limited detail in the draft PPS, it is difficult to make an informed assessment of its implications. Belfast Healthy Cities believes further detail is

required, for example in the shape of an Amplification and Justification section as incorporated in other PPSs. It is important to provide this information and open it to scrutiny before the PPS is adopted, in order to enable stakeholders to make a full assessment. Belfast Healthy Cities would also be concerned that lack of clarification will lead to confusion and may also complicate decision making from a legal viewpoint.

Belfast Healthy Cities also calls for definitions to be provided and clarified. The current draft does not exhaustively explain what is meant by 'substantial' or 'determinative' weight, and the legal difference between these. Clear definitions are required to avoid the risk of confusion, and also to provide a sound basis for implementing and applying the policy.

A further, and more significant, concern is the lack of clear justification for the policy. Belfast Healthy Cities appreciates the rationale that the planning system should contribute to meeting strategic priorities for Northern Ireland, in this case wealth creation. However, we believe that a) there is no clear need for a specific PPS24, b) the implications of the policy have not been fully explored. Moreover, we believe that PPS24 must be reviewed in light of a broader policy and legal picture, which has changed in one particularly relevant dimension. While the draft PPS was written in adherence to the Planning (Northern Ireland) Order 1991, there is now a new recently adopted Planning Bill, which identifies furthering sustainable development and improving or promoting social wellbeing as aims of planning.

Justification for PPS24 and alignment with law and policy

We note that economic development is already a material consideration, as outlined for example in PPS4. Therefore, it is not clear what added value a specific PPS can bring, if the aim is simply to underline the importance of economic considerations. Meanwhile, if the aim is to enable prioritising economic considerations above social and environmental issues, more fundamental questions arise.

The new Planning Bill gives explicit priority to sustainable development and social wellbeing as aims of planning. It therefore appears that at minimum, clarification is needed to outline how PPS24 conforms to this requirement. Clarification is also needed on how PPS24 meets other legislative requirements, including European directives relating to environmental and social protection. In this regard, Belfast Healthy Cities has particular concerns about the proposal to give 'determinative' weight to economic considerations.

At a more operational policy level, it is also important to clarify how the PPS is aligned to other Executive policies. PPS1 itself states that "*the Department must integrate a variety of complex economic, social, environmental and other factors, many of which have implications beyond the confines of the land-use planning*

system.” PPS1 also emphasises sustainable development and the precautionary principle. The cross cutting Sustainable Development Strategy also emphasises a balance between economic, social and environmental issues, and it is unclear how PPS24 can support this.

In conclusion, Belfast Healthy Cities would urge careful consideration of the need for a specific PPS, in light of a full range of evidence.

Implications of PPS24

In relation to the potential impact of PPS24, Belfast Healthy Cities believes that further consideration of the full implications is required. There appears to be a risk that the policy is based on an unhelpful dichotomy in which social and environmental issues are seen as competing with or even inhibiting economic development. However, this fails to take account of the complex linkages between the issues, and entrenching such a dichotomy not only hinders the development of a sustainable, equitable and socially prosperous Northern Ireland, but also risks harming the long term economic potential of the region.

It is important to keep in mind that a successful economy does not exist in and by itself. First of all, a strong economy is underpinned by people: skilled and healthy people, who are able to effectively utilise opportunities and contribute to society as well as to regenerating a sustainable economy. A healthy population is in itself an important yardstick of a successful society, as it indicates policies that work to support the wellbeing of all population groups.

Building a healthy population requires support from the physical environment, eg. access to green space, a choice of transport modes other than the private car, and appropriate housing. It also involves tackling inequalities in health, which typically arise as a result of differences in living conditions. People and communities affected by disadvantage require special attention, as they typically are less able to adapt, and are often more vulnerable to negative impacts than others. For example, they may be more at risk of harm from increased traffic, because their health is poorer. People affected by deprivation are also least likely to own a car, and are therefore often unable to seek work in places dependent on car transport. Conversely, improving access to (public and active) transport, ensuring good, safe living conditions for all and also strengthening access to education and training can significantly reduce inequalities and help create a healthy, active society where people are able to take responsibility for themselves.

Failing to take account of this not only marginalises people in ways that increase the risk of social exclusion and associated issues, it also contributes to benefit reliance and high public costs. For example, obesity costs the UK economy £16 billion per annum, and the direct costs to the NHS are in the range of £4 billion per annum. There is a link between inequalities, joblessness and benefits

reliance, and the physical environment plays a role in shaping people's job opportunities. Ill health related to air pollution also imposes costs in the range of £8bn per year on the UK economy, while the costs of physical inactivity has been estimated at around

Similarly, protecting the environment is an imperative for a responsible society, but the environment is also a key resource for the region. Agri-business is an important manufacturing sector in Northern Ireland, while the impressive landscape of Northern Ireland has significant tourism potential and therefore should be safeguarded as a resource for one of the most important economic growth sectors. Increasingly, in particular highly mobile global business also prioritise good social and environmental conditions among investment decision criteria: attractive living conditions are seen as essential prerequisites for attracting the highest calibre of staff. Therefore, giving appropriate attention to environmental considerations can in fact contribute to economic prosperity, rather than reduce it.

More generally, it may be worth noting that the economy is not necessarily an end in itself. Places are built on and around people, and the economy is key to create conditions that allow people to flourish. Attracting business and investment is therefore important, but investment should contribute to a generally healthy and prosperous society, and not vice versa. Therefore, it would appear prudent to ensure that any development proposed for any fast tracking not only may bring in investment, but also contributes to the long term prosperity of the place and its people. Failing to do this can certainly create short term wins, but over the longer term risks undermining the unique character of Northern Ireland and the ability of the region to sustain itself.