

Response to draft Strategic Planning Policy Statement, Department of the Environment

April 2014

Purpose of planning

Belfast Healthy Cities welcomes the SPPS in principle, and also welcomes the overall aim to develop a more strategic and streamlined approach to planning policy. In particular, this offers opportunities to identify overarching priorities and eliminate any conflict or confusion between subject planning policies.

Belfast Healthy Cities also welcomes the inclusion of sustainable development and wellbeing in the more widely defined purpose of planning based on the 2011 Act. Planning plays a key role in organising society and the everyday life of people, communities, services and business, and it is crucial that this is recognised in the core definition and intended aims of planning. It is particularly important to underpin and support an effective link with community planning. However, to encourage a similar understanding and shift in attitudes among planning stakeholders, it would be very helpful to explicitly set out a vision for planning in Northern Ireland. The elements of this are already included in the draft SPPS in the core planning principles, and a vision would be helpful to pull these together, while also providing clarity and appropriate consistency and equity across the region. The SPPS should also require Councils to develop a vision for their area as the core element of the LDP.

Belfast Healthy Cities welcomes the approach taken towards balancing economic, social and environmental elements. This emphasises the important role that planning plays in society, and underlines the move towards a collaborative approach. However, it is clear that implementing this will be challenging, and it appears likely that challenges will be mounted to the principle itself. To strengthen the principle and its validity, in particular against challenges, it would be helpful to establish, or create links to, a strong evidence base demonstrating the impact and benefits of a balanced approach. In particular, it would be important to establish an evidence base demonstrating the importance of a long term view and potential risks of short term approaches (eg. potential social impacts of a short term investment). This could helpfully be developed in partnership with the universities, as well as potentially relevant third sector organisations. Councils should also be required to develop a

local evidence base documenting the impact of planning decisions on local communities, environmental and business interests.

While Belfast Healthy Cities supports the transfer of planning functions to Councils, it is of some concern that issues may arise in relation to sub regions, such as the Belfast metropolitan area, through divergent approaches in neighbouring Council areas. It would be helpful if the SPPS, or further guidance, would encourage neighbouring Councils to collaborate on their LDPs with regard to boundary areas. This would provide certainty for residents and businesses in these areas, and would also reduce the potential for undue competition between Councils. To ensure regional equity, it will also be important that soundness testing of LDPs stringently applies the same criteria throughout.

Core planning principles

Belfast Healthy Cities welcomes the introduction of the core planning principles, which set out a positive framework that can effectively support implementation of the overarching aims. In particular, it is encouraging to see the inclusion of health and wellbeing among the principles. Planning has an extensive effect on people's health and wellbeing, by shaping their living environments and setting the context for everyday life, thus affecting factors such as access to jobs and services, opportunities to socialise, use green space and engage in physical activity, and choice of transport mode. It would be helpful, however, if stronger reference was made to these wider, 'cross cutting' health impacts, to help stakeholders make the linkages. Belfast Healthy Cities is developing resources on this and would be pleased to support development of additional guidance or resources, should that be helpful.

Belfast Healthy Cities believes the core principles offer a very positive overall guiding framework, and it is essential that they do not remain merely aspirational. It would be helpful to clearly establish the intended status and weight of principles, and for example require the principles to be used in informing priorities and policies within LDPs. To assist with this clarity, the core planning principles should also be more concise and more coherent in delivering an overall message and vision for planning, in particular for the quality of environments, and their direct relationship with healthy, socially inclusive places that support wellbeing and prosperity. The explanations currently included are in themselves helpful, but through the detail provided have the potential to create confusion with subject policies, or inadvertently impose limitations. It may be helpful to incorporate a reference within this section to the Living Places document, which although still in draft, includes a coherent set of guidelines that are relevant not only to planning, but across a range of sectors.

For example, air pollution and noise are important health issues which should be considered in planning, but many wider environmental factors have major health impacts that can similarly be addressed through planning. For example, mixed use

neighbourhoods – coupled with good public transport - increase the relevant area for job search also for people without qualifications or private transport, which can help tackle economic inactivity and low income, which are the greatest risk factors for disadvantage and ill health. Ensuring access to green space within neighbourhoods and residential developments enhances opportunities for residents to create a sense of community, and it also encourages physical activity, including play for children.

Accessibility and connectivity is a key issue not included among the core principles, which receives limited reference throughout the draft SPPS. It would be helpful if consideration was given to incorporating accessibility and connectivity in some way, as they are main factors affecting not only people's health, but also take up of services, patronage of business, logistics services and, through these, the prosperity of Northern Ireland as a whole. Planning influences accessibility and connectivity through zoning, and explicit recognition of this would strengthen the SPPS. It would also be helpful in order to shape the relationship between spatial and transport planning, which is key for the creation of living places. Guidance on this issue would also seem important in the two tier context of local spatial planning and regional transportation planning.

Local Development Plans

Belfast Healthy Cities welcomes the broad framework for local level decision making on planning. In particular the stronger focus on front loading and community engagement through SCIs and pre application community consultation is positive, and can contribute to developing a constructive dialogue with communities and other stakeholders. It is crucial, however, that investment is made in capacity building for community groups as well as Councils, to ensure an effective and equitable process. It will also be important that the concept of 'community' is defined in finer detail in the SCIs, to ensure all stakeholders are included.

Belfast Healthy Cities supports the principle of pre application community consultation, which offers local stakeholders an opportunity to engage with the developer at an early stage, and can reduce challenges at a later stage. However, it is unclear from the draft SPPS, and also the 2011 Act, who will be tasked with leading it and how independent this will be. A degree of independence from the developer will be vital to ensure a successful process, which in turn is essential to enable a front loaded approach to function. It would be important to state a principle in this regard in the draft SPPS, to strengthen confidence among stakeholders and provide clarity for Councils.

The hierarchy of development, in principle, provides a helpful tool for planning authorities. However, with additional demands on major development applications compared to local development, it is important to ensure that use of artificial methods to limit applications below the relevant thresholds is discouraged. Facilitating

strategic approaches to development, and avoiding piecemeal development on larger sites, is vital to ensure that development maximises benefits (eg. provision of green space, play facilities, community facilities) and minimises disruption (eg. from prolonged construction) for the local community. Options for achieving this should be outlined, eg. through planning agreements, use of limits for sequential applications on the same or adjacent sites, etc. While outwith the SPPS as such, it would also appear important to set standards for community benefits offered by developers to communities, in order to ensure a fair process for everyone.

Subject policies

Belfast Healthy Cities welcomes the Town Centre First policy. This offers a balanced but sufficiently flexible approach, which will enable the development of strong local centres that can drive sustainable economic prosperity. In particular, strong town centres that offer a diverse but concentrated retail and service offer, have enhanced appeal for both residents and visitors. It can also be noted that a town centre first approach offers wider social and health benefits, in addition to economic benefits including potential for a stronger small and independent business sector that is most likely to reinvest profits locally. Examples of these wider benefits include supporting social cohesion and shared space, through creation of meeting places, and supporting social wellbeing, through the strengthening of local identity and local networks. It is important, however, that this policy is implemented in partnership with economic and transport organisations, and guidance in this area appears to be a key priority. Balancing the uses within a town centre may be a specific issue that requires attention in order to ensure appropriate diversity and avoid unhelpful clustering. The latter would concern in particular clustering of bars and nightclubs, which can increase the risk of anti social behaviour and public disorder.

It is of some concern that the affordable housing policy remains outstanding, as affordable and in particular social housing is a key issue for most areas in the region, not only in terms of planning but in terms of overall development. It is vital that this policy is integrated into the final SPPS, in order to create clarity and certainty for developers as well as communities.

Transitional arrangements

Belfast Healthy Cities appreciates the scale of forthcoming change and the importance of continuity during the bedding in period. Alongside continuity, certainty will also be important, in particular to elected representatives as new decision takers on planning. In this light, it appears that the proposed transitional arrangements create significant potential for confusion. This has implications for the timely production of LDPs, and also for the implementation of LDPs, which are to be delivered against a different policy. There also appears to be a risk for confusion at a regional level, should there be a significant time difference in the adoption of LDPs

between Councils. At a minimum level, it would be helpful to clearly state in the SPPS the relevant weight to be given to each policy framework.

However, the SPPS also states that it contains the vast majority of provisions in extant PPSs, and does not constitute a review of policy direction. As such, keeping both the suite of extant PPSs and the SPPS appears to be duplicating provisions, which there appears to be no clear justification for. Belfast Healthy Cities believes that introducing SPPS, when final, as the leading framework would create greater clarity and certainty, and would support this substitution. Introducing SPPS as the overarching framework would also allow the production of a suite of LDPs to a single framework, which would enable consistency across the region and between the production and delivery stages. This would also assist in ensuring all LDPs undergo soundness testing to a single set of criteria, reducing the potential for confusion and challenges. Should it be feasible, the detailed provisions in the extant PPSs could potentially be retained as guidance through the transitional phase.

Conclusion

In conclusion, Belfast Healthy Cities supports the principles of the SPPS and welcomes in particular the inclusion of health and wellbeing as a core principle of planning. In itself, however, the SPPS provides vision or limited detail, and further guidance will be essential to provide for a transparent and effective planning function within Councils. Capacity building of all stakeholders, in particular elected representatives and Council officials, will be even more crucial to enable effective embedding and development of new approaches. It is also important to recognise the long term nature of this process; provisions such as mentoring and ongoing capacity building by the professional planners and current planning decision makers will be an important element for a considerable period.

Learning from elsewhere may also support the transition process and period. Through membership of the WHO European Healthy Cities Network, Belfast Healthy Cities has links with 99 cities across Europe, and capacity building is one of the core roles of Belfast Healthy Cities. Should it be helpful, Belfast Healthy Cities would be pleased to support the planning reform with eg. evidence and examples from elsewhere.