

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment
Room G-07, Waterman House, 5 – 33 Hill Street,
Belfast, BT1 2LA
Telephone: 028905 43184/43050
secretariat-hillst@doeni.gov.uk
www.cncni.gov.uk

Draft PPS24 Public Consultation
Planning Policy Division
Department of the Environment
Millennium House
17-25 Great Victoria Street
BELFAST BT2 7BA
Via email

DRAFT PPS 24 - ECONOMIC CONSIDERATIONS

CNCC welcomes the opportunity to comment on Draft PPS24. We have a number of serious reservations about this PPS, which are set out below, but have also found it difficult to address a proposal that lacks the Amplification and Justification that normally accompanies a PPS. This absence strikes us as particularly odd in a document that could change the entire way that planning applications are considered. We would urge that before a PPS on Economic Considerations is produced a section on Amplification and Justification should be developed and consulted upon.

Sustainability

Sustainable development is a clear goal of the Northern Ireland Assembly, as set out in the Sustainable Development Strategy.

The principle of sustainability is also clearly defined in Paragraph 2.2 of the Regional Development Strategy *Shaping our Future* as the ability to 'meet the needs of the present without compromising the ability of future generations to meet their own needs'. That paragraph goes on to state that 'society and economies are completely dependent on the environment which encompasses them and are therefore bound to its limits and capabilities'. The principle is also clearly stated in PPS4, which 'seeks to facilitate and accommodate economic growth in ways compatible with social and environmental objectives and sustainable development'.

We believe that this PPS should also make clear that all economic development should be sustainable and not damage the natural and built environment. The lesson of the past few years, both here and in the neighbouring Republic of Ireland, where economic factors were allowed to outweigh other considerations in the appraisal of development, has clearly not been learned, with the result that we are now paying financially as well as environmentally for unsustainable practices.

Consideration of planning applications to ensure sustainable development requires careful examination of economic, social and environmental factors in a balanced way. Giving additional

weighting to one of these – in this case economic factors – will inevitably lead to an unsustainable approach. This inconsistency between different parts of the planning system must be addressed or it will lead to endless legal challenges and disputes. Rather than speeding up the planning process this will undoubtedly slow it down.

Definitions

Policy EC1 contains two adjectives that require much tighter definition and clarification: 'significant' and 'substantial'. Are the economic implications to be considered on a regional, province-wide scale, or on a local scale? Who will assess the significance of the economic implications, and decide whether they are worthy of 'substantial weight' being afforded to them? How substantial is 'substantial', and who decides when it becomes determinative? In the single, brief explanatory paragraph we would also suggest definition of the terms 'economic implications', 'proportionate', 'sufficient' and 'significance'.

As this Policy stands at present it appears to present unlimited opportunity for legal challenge, which, as we pointed out above, can only slow the planning process down.

Economic Appraisal

Draft PPS24 contrasts enormously with Draft PPS23, issued at the same time for consultation. PPS23 is accompanied by a 70 page Best Practice Guide, much of which is taken up with the detailed process of economic appraisal of development that may enable a heritage asset to be preserved as a public asset.

As Section 5.14 points out it is essential that due diligence is practised by the planning authority in checking and analysing these figures before other planning considerations are over-ruled. This should involve the use of qualified and experienced professionals, and should consider the figures at the date of application, not at some unspecified projected date. If economic considerations are to take precedence over other considerations it is essential that there is some similar due diligence procedure to ensure that the figures are realistic and provide real economic benefit. For example, jobs created must not be at the expense of existing jobs, as may be the case particularly with retail developments.

We would also point out that economic considerations are often given determinative weight already, simply because until now it has been virtually impossible to assign a monetary value to our wider environment, and the benefits it may offer to society. These benefits are generally referred to as Ecosystem Services, and as a result of recent studies, including The Economics of the Environment and Biodiversity (TEEB), and the National Ecosystem Assessment (NEA), it is now becoming possible to quantify the services.

We believe that these developments should be taken into account by planning authorities in the assessment of economic considerations to take a truly balanced and sustainable view of any planned development.

Speed of Planning Process

Paragraph 1.2 of the Introduction states that 'It is vital that proposals that may bring investment are processed as quickly as possible'. While we acknowledge that economic development is needed in Northern Ireland, we would question that short-cutting the planning process for developments that 'may' bring investment is sustainable, orderly or democratic. Rather than faster planning process we require a more effective and efficient one, which is plan-led, has the right expertise applied at the appropriate point, involves environmental assessment where necessary and leaves scope for interested individuals, communities and organisations to have their say.

Strategic Environmental Assessment

While SEA is not normally required for policies as opposed to plans and programmes EU guidelines make it clear that a proposal that sets the framework for development consent of projects within the EIA Directive does require an Assessment. There should at least be a screening process to assess likely effects, as was done with the RDS.

Conclusions

CNCC firmly believes that this Draft PPS is redundant. In its current form it appears to run counter to the principles of Sustainable Development. The importance of economic development is clearly recognised in full context within PPS4. We consider that it will lead to increased legal challenge which will slow up the process, as will real due diligence assessment of economic implications provided to accompany any planning application. We consider that it introduces ambiguities and contradictions into the planning system that will create further complications.

Finally we believe that it undermines the widely-welcomed moves towards a genuine plan-led planning system, with community involvement.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick Casement', written in a cursive style.

Patrick Casement
Chairman