

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

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SHAPING OUR FUTURE (RDS) 2025

CNCC welcomes the opportunity to comment on this consultation document. In doing so we would like to make some general observations and then address specific issues that fall more closely within our remit.

Quality.

We are very disappointed in the overall quality of this document in a number of ways:-

- Poor articulation of ideas – for example, Paragraph 1.4 “*Place, where things are and where things happen, can be often overlooked in decision making but it matters to people*”.
- Non sequiturs – for example, Paragraph 1.5 “*This Region is rich in landscape. Over time houses, villages towns and cities have grown, businesses have been established, schools and hospitals built, roads and railways and air and sea ports developed. In recent years the speed of change has accelerated*”. The connection between the three sentences is unclear, and this reads as though it had been edited down from a much larger section, losing all meaning in the process.
- Spelling mistakes – for example, from the trivial, Paragraph 1.8 ‘*affect*’ for ‘*effect*’, Diagram no.4.4, ‘*Cites*’ should read ‘*Cities*’ to the more serious in Paragraph 2.52 where ‘*SDS*’ should surely read ‘*RDS*’.
- Poor or misleading diagrams – for example, Diagram 4.4 claims to show that Belfast is the closest city for 75% of the population, but simply shows the province divided into an eastern area and a western area. It could equally be claimed that it showed the area of influence of the North Atlantic Oscillation on rainfall patterns, with higher rainfall in the western portion. Diagram 4.7 shows deprivation levels in Belfast, but the areas are grossly distorted by the inclusion of a large part of Belfast Lough.
- Contradictions – for example, Diagram 2.4 shows the BMA and its hinterland, while Diagram 4.4 purports to show the hinterland for Belfast, which is very different, and Diagram 4.5 shows a third interpretation of a catchment for Belfast.
- Editing mistakes – for example, much of Chapter 2 has been cut and pasted in such a

way that bullet points and even whole paragraphs are in the wrong place. There are apparently no Relevant Executive Targets/Goals for our Society, though at least one appears in the section on Environment. Paragraph 2.6 should be titled 'Economy'.

- Non-sentences – for example, final bullet point of 5.30 '*Ensuring they are integrated appropriately within the settlement or rural landscape*'.
- Poor organisation of material – for example, Section E, The Rural Area, in Chapter 4 is simply a series of random thoughts on rural areas that fails to give any idea of the complexity or variety of rural communities. A huge archive of authoritative and informative work on rural Northern Ireland exists (for example the RDC's *Picture of Rural Change*) but has clearly not been accessed to inform this document.
- Sheer nonsense – for example, Diagram 4.1, which shows a Hierarchy of Settlements and Related Infrastructure, states that our principal cities should provide '*Wind farms, Wave power, Thermal Treatment, and AONB/ASSI*'. If any thought had been given to this diagram it would have been obvious that Environment simply does not fit into this hierarchy – most of the suggested infrastructure is required at all levels of settlement, but simply on different scales.

In a document as important as this, and which has been so long in its gestation, there is no excuse for this standard of writing and presentation. Slipshod writing and editing suggests careless thinking.

Planning Principles

The planning concepts on which the RDS is based seem to CNCC to be outdated and unhelpful. There seems to be a strong emphasis on matching up concepts such as Hubs and Gateways with the National Spatial Strategy of the Republic of Ireland, even though it is clear that the NSS has totally failed to deliver in that country. The RDS claims to be forward looking and to take account of the economic changes that have occurred over the past two years and of the effect of climate change, but in reality it is firmly rooted in the past. The focus for economic activities has shifted from '*HUBS, CORRIDORS AND GATEWAYS*' (Paragraph 2.54) to Sub-Regional Centres, Economic Corridors, and Gateways. If there is a real difference it is not clearly articulated. The concept of economic corridors appears to be driven entirely by roads and road development, even though it is clear that road development creates traffic as much as being a response to perceived demand. Indeed, it would seem that the main driver for this strategy has been to respond to perceived realities rather than to work towards a vision of a more equitable and sustainable future.

The sense of Northern Ireland falling behind is clearly demonstrated by recent publications from elsewhere in the UK, particularly Wales and Scotland. The Wales Assembly Government has produced an excellent Environmental Strategy entitled *A Living Wales*, with the aim of making the optimum use of finite land and water resources and ensuring that Wales' natural and cultural capital assets are maintained and enhanced. The Scottish Parliament has produced *Getting the best from our land- a land use strategy for Scotland*, which again contains a clear recognition of land as a finite and fragile asset. These fundamental principles seem to have been missed by this Strategy.

The role of the RDS should be to deliver firm, clear guidance to the authorities that will be managing planning and development in Northern Ireland, in such a way that there is consistency and transparency in their approach. This is clearly set out in the recent Planning Bill which commences as follows:-

General functions of Department with respect to development of land

1.(1) The Department must formulate and co-ordinate policy for securing the orderly and consistent development of land and the planning of that development.

(2) The Department must

(a) ensure that any such policy is in general conformity with the **regional development strategy**;

(b) exercise its functions under subsection (1) with the objective of contributing to the achievement of sustainable development.

Unfortunately this document in general provides a disorganised, vague and bland set of thoughts without enough detail to be of much practical value, or to address the real issues facing society in an uncertain future. CNCC would suggest that what is required is a Land Use Strategy, which would provide the necessary guidance in a practical format.

Timing

The timing of this document seems singularly ill-judged for a number of reasons:-

- Elections to the Assembly in May will almost certainly lead to a major revision to the Programme for Government, which heavily underpins much of the RDS.
- The Planning Bill currently being considered by the Assembly will transfer many planning functions from DOE to local authorities.
- The Local Government Reform Bill also being considered by the Assembly will create a new and very different local authority set-up in terms of both boundaries and responsibilities.
- The publication of the draft Regional Transportation Strategy, which should deliver part of the RDS and proceed in tandem with it, has not yet taken place. Though the current Strategy reaches the end of its life in 2012.
- A consultation document on Spatial Strategies on the Island of Ireland: Framework for Collaboration has been issued. As the Spatial Strategy for Northern Ireland the RDS is central to this Framework, but it is not entirely clear which version of the RDS this refers to.
- A new Tourism Strategy for Northern Ireland is about to be signed off by the Minister for Enterprise, Trade and Investment, and proposes a doubling of the economic return from tourism for Northern Ireland, with inevitable linkages to development. In spite of that this document is not referred to anywhere in the RDS.
- A proposed new Environment strategy for Northern Ireland, currently being explored by Environmental Policy Division of DOE.

The result of these changes will create a very different climate for planning in Northern Ireland, which will necessitate significant guidance for the new planning authorities in preparing their Development Plans. The RDS should form the basis of that guidance, and should be tailored to the needs and requirements of the new authorities. Yet there is no mention anywhere in this document of these proposed changes beyond a passing reference to the Review of Public Administration in 1.12, which suggests that it will require a review of the RDS! This seems to be an admission that this document will be out-dated as soon before it is even published!

The situation is further confused by the concept of Sub-Regional Centres, though there is a degree of uncertainty here with the text describing them as 'proposed', and the accompanying map (Diagram 4.5) labelled 'Potential Sub-regional Centres' and excluding Downpatrick and Newtownards which are mentioned in the text. These Centres and their 'Catchments' are apparently not related to the proposed new Council areas which will form the basis of the new Planning system.

The position with regard to the Regional Transportation Strategy is also critical. It is unclear as to which influences and informs which, while it is essential that some strategic guidelines are provided, not just on roads, but even more critically on rail and airport development.

All in all, the evidence suggests a total lack of co-ordination, not just between Departments but also within DRD, in the approach to strategic planning across various sectors in Northern Ireland. This can only lead to confusion, contradiction and duplication of effort, at a time when greater efficiency within the public sector is being called for on all sides.

Sustainability

CNCC welcomes the clear articulation of the definition of sustainability in Paragraph 2.2. Unfortunately from there on it becomes clear that the concept has not really been understood, and as so often, there is confusion with sustainable growth and with sustaining in the sense of nurturing, or keeping viable. This is typified in Paragraph 3.5 which sets out as the first of the aims of the RDS as being to '*Support strong, sustainable growth for the benefit of all parts of the Region*'. This immediately introduces the concept of sustainable growth which usually means a rate of growth that can be sustained, ie kept up, over a foreseeable timescale. This is not the same as sustainable development as defined in Paragraph 2.2. Paragraph 3.5 goes on to state '*The ability to sustain and grow the economy...*', which adds confusion by introducing the idea of providing sustenance to the economy.

Similarly Paragraph 1.9, which states '*This Region, in common with other regions within Europe, shares the **major challenge of providing and sustaining a high quality of life for all its citizens in the 21st Century.***' 'Sustaining' here means 'maintaining', and it would be better to use that term to avoid ambiguity. The paragraph then continues '*Looking outwards, it must build its economic strength in a highly competitive and volatile economy. To do so sustainably, without compromising equality, fairness, inclusion and the promotion of good relations, must be key principles*'. It is not clear whether sustainable in this context means sustainable as in sustainable development or as in sustainable growth. If the RDS is to fulfil the core principle of having sustainable development at its heart it is essential that these confusions and ambiguities are sorted out.

An important aspect of sustainability is the recognition that there is a finite supply of natural resources, and that they therefore must be used wisely and efficiently. Indeed the European Commission has recently announced that Resource Efficiency is to be one of its seven flagship initiatives for the next five years. In fact, to all intents and purposes, this initiative is the EU Sustainable Development Strategy, but there is no recognition of that in the RDS other than some commendable but vague references to the unsustainability of current patterns of travel in Paragraphs 2.48 to 2.50, which appear to push responsibility on to the Regional Transportation Strategy.

Tourism

As highlighted above, the RDS needs to acknowledge the Tourism Strategy for Northern Ireland, and to incorporate its thinking. At present the RDS does not appear to fully appreciate the potential for tourism to be a major growth area in the economy in the future provided that we do not damage the natural and historic environment on which most of the growth could be based, and there is no mention of tourism in the sections on the economy in Chapter 2. Strategic Guidance SG27 does make a promising start, but it is weakened by the change in wording from the statement of SG27 '*Promote a sustainable approach to the provision of tourism infrastructure*' to '*Promote a balanced approach that safeguards tourism infrastructure while benefiting society and the economy*' in the explanatory paragraph. These statements are quite different and could even be seen as in direct conflict with each other. The RDS must give clear, unambiguous guidance if it is to be of any worth.

CNCC has looked carefully at the consideration of our environment in the Strategy and wishes to make a series of points on how this key topic is dealt with.

2.4 Environment

This section appears to be a rather random collection of statements about the environment with no perceptible thread or link between them. Some are very precise, while others, such as that on water quality are vague almost to the point of being meaningless. Others are deeply misleading, particularly that on environmental designations, which fails to recognise that the figure quoted includes a great deal of double counting: virtually all SACs, SPAs and Ramsar Sites are also designated as ASSIs. There is no mention of the coastal or marine environment nor of the built heritage which have all suffered so much over the past ten years. The only reference to Biodiversity is in the paragraph on climate change, with no mention of the total failure to meet the 2010 target of halting biodiversity loss that the government was committed to achieving. The predictions on climate change are simplistic and misleading. The final bullet point is a social issue not related to the environment.

This is surprising given that the information was available and collated within the Environmental Report that was meant to inform and guide the policy development process. Included in this report is an excellent summary table of relevant environmental concerns (Table 4.9) which could easily have been reproduced at this point.

2.62 Proposed Approach

We believe that there should be a section here on the natural environment, with reference to both biodiversity and landscape. There should also be a section covering our built heritage, again specifically mentioning archaeology and historic buildings. There should also be a section covering renewable energy development which will certainly require a major input from planners over the foreseeable future.

3.5 Aims

We welcome the last bullet point on page 37. We suggest that the clause on ecosystem services is taken out of the already long second sentence and expanded slightly into a separate sentence, with reference to the sort of services included (water quality, air quality, flood relief, carbon sequestration, pollination etc).

We also welcome the following bullet point on climate change. We suggest that references to climate change do not always refer to it as a threat, but rather as a challenge. If we are able to mitigate its effects and adapt to the changes sufficiently it should also provide opportunities and this should be recognised.

Diagram 4.1 The Hierarchy of Settlements and Related Infrastructure

The inclusion of Environment in this diagram is patently inappropriate. It leads to the ridiculous statement that Wind Farms, Wave power, AONBs and ASSIs should be sited in our principal cities! Similarly air quality is given as the responsibility of Regional Towns. Most of the environmental infrastructure mentioned needs to be dealt with at all levels, but on different scales, while landscape and wildlife designations are clearly not to be regarded as infrastructure.

4.17 The Rural Area

We would suggest that this paragraph completely fails to understand the true nature of the rural area. It is principally characterised by non-nucleated settlement, ie single dwellings in the countryside. This category of 'settlement' has increased enormously over the past ten years creating major problems for our transport and utility infrastructure, and a serious sustainability

issue. The failure to recognise and address this self-evident fact anywhere in this document seems staggering.

4.48 and following – The Rural Area

As stated earlier, these paragraphs seem to be a random selection of statements that fail to give any idea of the diversity and complexity of the rural area. In spite of the fact that 40% of the population lives in this 'area' there is little or no recognition of the role it plays in the life of the province. Quite remarkably there is no mention of either agriculture or forestry, the two activities that occupy most of our land area and dominate our landscapes, remaining an important economic force in the 'rural area'.

The Consultation Question 11 is ridiculous in suggesting that the paragraphs preceding even touch on any function of the rural area. To suggest that there is only one function is absurd and clashes strongly with the growing realisation of the important concept of the multifunctionality of land.

We are also aware that there are now several different definitions of the 'Rural Area' within different government departments – DARD, for example have a very different interpretation. This will inevitably lead to problems with the delivery of government policy, and some sort of common or compatible approach is essential.

SG3 Protect and enhance the quality of the setting of the BMUA and its environmental assets

5.8 The setting of the BMUA and its environmental assets

We strongly welcome this relatively clear and straightforward Strategic Guidance and its accompanying statement with the explicit mention of the coastline, Belfast Lough, Lagan Valley Regional Park, and the Belfast Hills. However we are concerned that the statement that these areas should be safeguarded should be made more specific, with examples of the mechanisms that planning authorities should use to ensure their protection. We also feel that there might be a reference to the Belfast Tourism Strategy, which reinforces many of these points and makes a further case on the basis of the creation of sustainable economic growth through a better tourism product.

SG5 Enhance the role of Belfast City Centre

There appears to be a mismatch here between the text of the draft RDS and the text that the draft Habitats Regulations Assessment (HRA) was commenting on. The recommendation in the HRA ' *This role will grow further as the ...potential of the Titanic Quarter lands are realised, although obviously growth in these areas must take into account the internationally important Belfast Lough SPA*' has not been included here.

5.21 The environmental assets of Derry City and the North West

Again we welcome this Strategic Guidance, though it is not entirely clear why the three council areas of Derry, Strabane and Limavady are singled out – there is no equivalent protection for the setting of other cities, towns or specific areas. However we would wish to see the assets identified more explicitly as was the case for the BMUA. We would suggest mention of Lough Foyle (an SPA, ASSI and Ramsar site), the Rivers Foyle and Faughan with probably the most healthy salmon populations in Ireland, the Sperrins and Binevenagh AONBs, and Benone and Magilligan Strand, the finest beach in Northern Ireland. Again we would wish to see some clearer prescriptions of how these special places will be protected, for example with regard to windfarms, both onshore and offshore.

SG11 and SG12

The HRA comments on two quite different Strategic Guidances at this point – Promote economic development opportunities at urban centres across the region, and Grow the population in urban centres across the region, but its recommendation for inclusion in the latter is still included in the published SG. The inconsistencies are worrying to say the least.

5.30 Sustain Rural Communities

The final bullet point on facilitating the development of rural industries, businesses and enterprises also makes reference to rural tourism. We suggest that this should be given its own paragraph as a very specific business. The point that needs to be stressed is that the assets for rural tourism are all there in the form of our natural and built environment, and the infrastructure requirements are relatively small but need particularly sensitive development to ensure that they do not damage or degrade the assets. This has been clearly recognised in Policy TSM 1 of Draft Planning Policy Statement 16.

SG16 Reduce our carbon footprint

We welcome this Strategic Guidance, but suggest that climate change and air quality are separated into different individual guidances. There are some linkages, but generally the chemical compounds responsible are different and require very different approaches to deal with the problems they cause. There are enough confusions and myths about climate change without making the problem worse.

5.36

The recommendation in the HRA to include '*coastal squeeze*' has not been followed here. We would recommend inclusion of this important phenomenon, with some explanation of what is involved.

5.37

This paragraph is confusing. Is it about reducing energy consumption, resource efficiency or waste recycling? While these may all be connected it would be better to articulate them all more clearly. As in a number of cases clarity has been sacrificed for brevity.

5.38 Mitigation – Increase the use of renewable energies.

The final sentence of this paragraph about the siting of renewable energy installations perfectly captures the major shortcoming of this Strategy in that it makes a sweeping statement that we can all agree with, but provides no guidance as to how it might be achieved or how conflicts on the issue might be resolved. There need to be some clearly articulated principles that are prescriptive enough to provide a practical guide to the new planning authorities.

5.39 Adaptation – More efficient forms of transport.

We need to be absolutely sure that more fuel-efficient vehicles are also more carbon-efficient by looking at the whole life carbon budget for the proposed technologies.

Improve the energy efficiency of buildings. We fully support this point

Re-use land, buildings and materials. We fully support this point. We would like to see the point made in the Environmental Report to promote secondary aggregates included here.

Minimise development in areas at risk from flooding. We believe that 'Minimise' should be 'Halt'. One of the predicted outcomes of climate change that we seem to be already experiencing

is the increased frequency of high-intensity rainfall events with a resultant increase in flood risk. The Environmental Report clearly recommends that there should be no development in flood zones.

Protect soils. We strongly support this point, but would point out that mineral soils and peat behave quite differently. Peat has the capacity to store many times more carbon than mineral soils and therefore needs a higher level of protection and enhancement. Most peatlands are also priority habitats under the EU Habitats Directive. Given the mention of peatlands in the following paragraph we suggest that this one concentrates on mineral soils. We are disappointed that the recommendation from the Environmental Report on Habitat Management Plans for soil quality has not been included here.

Protect and extend the ecosystems and habitats that can reduce or buffer the effects of climate change. We strongly support this point, and welcome the inclusion of the concept of extending and enhancing these vital carbon sinks.

Identify key assets and areas that are at risk through climate change. We strongly support this approach which should have been adopted some time ago.

We suggest that this section should be expanded to introduce the concept of Managed Retreat, where it is recognised that the cost of protecting some areas of coastline may be higher than their value and that it may be better to accept a new shoreline than to fight nature in retaining the original one. A new, soft shoreline may also provide greater protection against further land loss by absorbing wave and tidal energy that would damage a hard barrier.

SG17 Manage our waste sustainably

We agree with all that is said in this section, but feel that it barely covers some of the crucial issues. There is no mention of Energy from Waste, or Combined Heat and Power schemes that should be part of a sustainable solution for waste. This is a very significant issue for Northern Ireland and, as shown by Belfast City Council's fight to achieve and maintain even low recycling levels, it will take a vast investment of time and money to achieve.

SG18

We believe that the important message conveyed in this guidance would have even more impact if this were divided into separate sections for the built and natural heritage. These are two critical areas that have suffered considerable damage and degradation over a long period, and if the Programme for Government is serious in its aim to 'Protect and enhance the environment for its own sake' it is important that they get maximum recognition and consideration.

5.42 Identify, establish, protect and manage ecological networks.

We are fully in support of this aim. We firmly believe that we must move on from a simple, site-based approach to nature conservation to a network approach, linking the higher quality sites through corridors and stepping stones of semi-natural habitat. We would stress that since the site-based approach has failed to halt biodiversity loss this ecological network concept is effectively our last chance. If we fail in this we will not only fail to meet our target of halting biodiversity loss but will see faster and more serious losses. In addition we cannot afford to focus solely on habitats and species but must see them in the wider context of the landscapes and geomorphology that shapes them. We would have liked to have seen reference here to the concept of Green Infrastructure which has gained widespread recognition in Europe and is a recognised planning tool. The Countryside Council for Wales' exemplary *Mapping Ecosystem Services* initiative states there is a need to proactively develop green infrastructures and ecological connectivity and address fragmentation, which will have the dual function of enhancing biodiversity and improving resilience and adaptation to climate change.

Case Study

We are pleased to see recognition of the achievement of the Fermanagh Geopark, but would point out that this was achieved outwith Government policy!

Protect and manage important geological and geomorphological features. We welcome this statement.

Protect and manage the coast. We support this strongly. However the sentence which reads 'The landscape setting of features should be conserved' is meaningless as it stands and only reading the HRA elucidated it for us. It is essential to explain that these features are those for which sites have been designated under the Birds or Habitats Directives.

We strongly recommend that the commitment to protect the setting of our only World Heritage Site at the Giant's Causeway is set out in this section, as was the case in the original RDS. We are deeply concerned about the lack of any policy towards the marine environment as mentioned earlier. The coast is critical as the interface between land and sea, and needs to be recognised as such. We would like to see some commitment to Integrated Coastal Zone Management which has been discussed for two decades in Northern Ireland but never implemented.

Protect and manage inland water bodies. We support this aim, and the apparent commitment to achieve the WFD targets by 2015. We would have liked to see commitment to further progress towards improvement throughout the life of this strategy. We would also like to see the recommendation from the Environmental Report to direct potentially polluting development away from waterbodies included here.

Recognise and promote the conservation of local identity and distinctive landscape character. This sentence stands with no amplification or explanation which is a bit puzzling, since it is not entirely clear what it refers to. We suggest that some explanation of the Landscape Character Assessment and Areas should be given, and that they should be given much greater recognition as a potential tool for local policies within development plans. There should also be reference to the European Landscape Convention to which the UK has signed up and which we need to honour. This involves recognition and protection of landscapes and education and involvement of communities in valuing and conserving landscapes, which fits with the paragraph title perfectly. Since we share landscapes with the Republic of Ireland there is also scope for joint approaches.

Conserve, protect and where possible enhance areas recognised for their landscape quality. While we fully support this guidance we are surprised that AONBs are not formally recognised and named here as our only formal protection of landscape. In the earlier RDS they were mentioned by name (probably the only place in NI Planning literature where they were recognised) and we would like to see that practice continued here. They have little enough status as it is, and their position has been eroded by PPSs 18 and 21 which have failed to differentiate them from the rest of the countryside. We believe that the recommendation made in the Environmental Report to recognise and plan for landscape change should be included here.

Complete national and international environmental designations on both land and at sea. We fully support this clear statement of the need to designate and manage sites for nature conservation.

Consider the establishment of one or more National Parks. We have been considering this option for more than two decades without any outcome. We are concerned that current moves towards legislation appear to be aimed at National Parks without any real planning powers, which we would consider to be travesties of an internationally recognised brand. We feel that there needs to be a firm decision made as soon as possible on whether we are prepared to commit to genuine National Parks, and if not, to move quickly to improving our AONBs by giving

them greater protection and statutory management plans, with the resources needed to implement them.

SG19 Deliver a sustainable and secure energy supply.

The HRA makes two important points here that have not been included:-

- any energy plan will require not just an EIA, but an SEA
- in cases where a E2K site is potentially affected an EIA will not be sufficient, but will need to be accompanied by a HRA

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5.43 Increase the contribution that renewable energy can make to the overall energy mix.

We would suggest the inclusion of micro-generation of renewable energy as recommended in the Environmental Report.

Strengthen the grid. Some recognition should be given to the issue of bringing electricity generated offshore on to the land. This is a major strategic planning problem that so far has not been addressed and we could be faced with unnecessary multiple landfalls with intrusive infrastructure on our relatively unspoiled coastline.

Provide gas storage. The same technology could provide an opportunity for carbon capture and storage, which should be considered under climate change mitigation.

5.44 Society

This section makes no reference to public health and well-being, both addressed in the Environmental Report, and both vital characteristics of society. One particular recommendation of that report has been totally omitted from the RDS is the promotion of walking and cycling and the provision of accessible areas of recreation, apart from a brief mention in 5.20 under Strengthening the role of Derry. This omission should be rectified, as this is an important planning consideration that plays a vital role both in the health and well-being of our own population, and has the potential to provide important tourism benefits. We are already significantly out of step with the rest of the UK and Europe in this regard, and risk falling even further behind.

SG21 Support urban and rural renaissance

This guidance fails to pick up on the point made in the Environmental Report about the vitality and viability of out town centres. This has become a serious issue for Northern Ireland as out-of-town shopping centres suck the life out of our town centres, and strong guidance is required to reverse this trend.

5.49

The final bullet point refers to 'European sites' without making clear that these are nature conservation sites, not random plots of land that for some reason belong to Europe.

SG22 Manage housing growth to achieve sustainable patterns of residential development

We are concerned that figures used here to determine housing requirements are not up to date and that economic changes over the last two years have not been taken into account. The 2011 Census has just taken place, and we would strongly recommend that its findings are used to inform policy on housing.

5.58

Only part of the text recommended by the HRA has been included here. We suggest that the full wording is incorporated regarding the determination of the availability of sustainable water resources and sewerage capacity through appropriate capacity studies in advance of any allocation of housing.

Chapter 6 Regionally Important Infrastructures

CNCC is disappointed that this section does not contain specific sections on the railway network and the need to update and extend it. All mentions to rail are secondary to road links, and generally hedged with qualifiers, such as 'where available'.

We are also concerned about renewable energy provision, which appears to lack any strategic dimension, being left to private enterprise and individual planning applications, with little consideration being given to the accompanying need for changes to the grid or to cumulative effects. We believe that much greater strategic guidance is needed in this respect, with specific areas outlined as appropriate or inappropriate for different types of energy generation. This would save vast amounts of time and energy in terms of planning and assessment, and would lead to a more effective supply. We would commend the approach taken in the Wales Assembly Government's Technical Advice Note 8 on Renewable Energy (2005).

Chapter 7 Implementation

We are dismayed by the framework that is presented here, which we do not believe will deliver the objectives of the Strategy, because it does not represent the group that will become the most important players – local authorities, to whom planning powers will be transferred. If they are to deliver effective local plans they will require much more detailed and targeted guidance and advice, and held accountable for delivering these in an orderly and consistent manner as directed under the Planning Bill.

We also believe that the separation of Strategic Planning and Planning Policy and Control between DRD and DOE is a major barrier to successful implementation. All planning functions should be under one department if there is to be any hope of achieving the aim of this, or any, strategic plan.

Yours sincerely



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