



Subject:	Department for Infrastructure - Call for Evidence: Future Focused Review of the Strategic Planning Policy Statement (SPPS)
Date:	19 March 2024
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1.0	Purpose of Briefing Note or Summary of main issues
1.1	The Department is undertaking a 'Call for Evidence' on a potential focused review of the Strategic Planning Policy Statement on the issue of Climate Change.
1.2	The primary purpose of the 'Call for Evidence' is to engage with stakeholders on the proposed areas of focus for a review of the SPPS and to invite the submission of evidence on the relevant factors that can assist with determining the best way forward.
2.0	Recommendations
2.1	Committee is requested to: <ul style="list-style-type: none">Note the Council's draft response to the DfI consultation attached (Appendix 1)
2.0	Background
2.1	The Call for Evidence on Planning Policy and Climate Change focuses on a number of policy areas including water (Flood Risk Management), transport, planning in respect of climate Change.
2.2	The information gathered through the Call for Evidence will be considered by the Department and will help inform any decision by a future Infrastructure Minister on a review of the SPPS and the options for it.
3.0	Main Report
3.1	The Strategic Planning Policy Statement (the SPPS) 'Planning for Sustainable Development' was published in September 2015, following Executive Committee agreement. It has a statutory basis under Part 1 of the Planning Act (Northern Ireland) 2011 and the SPPS is judged to be in general conformity with the Regional Development Strategy 2035 (the RDS).
3.2	The provisions of the SPPS apply to whole of Northern Ireland. They must be taken into account in the preparation of LDPs and are material to all decisions on individual planning applications and appeals.
3.3	Whilst the SPPS and the planning system has the objective of furthering sustainable development at its heart, there has been much contextual change in the period following its publication, particularly with regards to the wider efforts of government in seeking to address the challenges presented by a changing climate.
3.4	Since the SPPS was published in 2015, tackling Climate Change has become a legislative requirement and it is a priority consideration in the context of the work and functions of DfI, other departments and the wider public sector.

3.5	<p>This Call for Evidence is part of the process of gathering the necessary information to inform a potential focused review of the SPPS in relation to Climate Change and the options and scope for any such review.</p>
3.6	<p>Should the outcome of this Call for Evidence lead to a decision to formally review the SPPS, such a focused review could seek to update and bring forward new and revised policy provisions on Climate Change on:-</p> <ul style="list-style-type: none"> • The Purpose of Planning, • Furthering Sustainable Development (including Mitigating and Adapting to Climate Change and The Importance of Ecosystem Services), and • The Core Planning Principles of the two-tier planning system. <p>If there is a decision to formally review the SPPS, the Council would have the opportunity to input into any more detailed consultation at that stage, and a further report would be brought to the Committee.</p>
3.7	<p>A focused review could also encompass a fresh look at the appropriateness of extant policy provisions on flood risk, transportation, and development in the countryside, given these are three key policy areas which are impacted by Climate Change (in addition to the review of regional strategic planning policy on renewable and low carbon energy which is already being progressed).</p>
3.8	<p>The consultation includes 7 questions seeking views on the SPPS's approach to:-</p> <ul style="list-style-type: none"> • The Purpose of Planning • Furthering Sustainable Development • Core Planning Principles • Flood Risk • Transportation • Development in the Countryside • Climate Change Agenda
3.9	<p>The Call for Evidence is seeking evidence on how and why the Department should update, revise, and improve a series of high-level strategic policies support the Climate Change agenda. For the most part the nature and approach to strategic policy in the SPPS is broadly appropriate for the purposes of planning and is consistent with similar regional policy. Moreover, the approach is consistent with that taken in the Council's recently adopted Plan Strategy (PS). Indeed, one of the tests of soundness of the PS was that it complied with the policy approach of the SPPS.</p>
3.10	<p>From an operational planning perspective, the policy provisions in the SPPS when read alongside the recently adopted PS and its Supplementary Planning Guidance provide adequate policy provision for dealing with the causes and effects of climate change. In preparing the LDP the Council agreed to take a greater focus on climate change, and this is reflected in the current policies.</p>
3.11	<p>Whilst the Call for Evidence is about seeking evidence on how and why policy should be amended; the Council's primary concern relates to any potential unintended conflation or ambiguity that could arise as a consequence of changes to the regional policy and how it relates to the LDP. There is a risk of confusion for participants in the planning process if there was to be a significant departure from the current policy. Whilst the provisions of the Planning Act (Northern Ireland) 2011 is clear in respect of the hierarchy of planning policy and the plan-led approach, it is important that this provision is clear, and care is taken to avoid any ambiguity.</p>
3.12	<p>The second issue is that the creation of new policy is probably less important at this stage than delivery of the policy objectives through planning and other related disciplines. Mechanisms around for example the adoption of SUDs schemes with new developments needs to be taken forward as a matter of urgency, as do processes for blue</p>

3.13	<p>and green infrastructure, district heating and wider energy supply etc. as these are seen as critical to delivery.</p> <p>There is a potentially significant policy contradiction with the acknowledgement of the importance of the proximity principle between where people live and where they avail of work and services with the relatively relaxed regional approach to rural housing. A concerted effort needs to be made to address this acknowledged anomaly by ensuring a more sustainable spatial approach to land use across the region. It may be appropriate to address these issues and their concerns to climate change through a formal review of the Regional Development Strategy.</p> <p>Financial & Resource Implications None associated with this report.</p> <p>Equality or Good Relations Implications/ Rural Needs Assessment None associated with this report</p>
4.0	Appendices
	Appendix 1: Council's draft Response to the DfI Consultation

APPENDIX 1: Council's draft Response to the DfI Consultation.

Summary of Questions

1) Can you provide any evidence on how and why the Department should update, revise, and improve 'The Purpose of Planning' as contained within the SPPS so that it is fit for purpose and suitably future proofed to appropriately support the Climate Change agenda going forward? Please detail.

Planning can provide lasting resilience to the impacts of climate change. It can implement local measures such as sustainable drainage, direct development to places that reduces the need to travel and enable better designed development more generally. Planning can also provide a strategic framework to deal with the impact of climate change and draw together a variety of disciplines.

The definition of the 'Purpose of Planning' is sufficiently generic to encapsulate Planning ability to address the causes and effects of climate change. The real focus needs to be on the delivery of the many good operational policies that already exist in the SPPS and the new LDPs and their Supplementary Planning Guidance to ensure that things like sustainable drainage is delivered through appropriate statutory mechanisms.

2) Can you provide any evidence on how and why the Department should update, revise, and improve 'Furthering Sustainable Development' (including Mitigating and Adapting to Climate Change and The Importance of Ecosystem Services) in order to better support the Climate Change agenda? Please detail.

There are a number of key improvements that need to be made to help us to further Sustainable Development protecting us from the worst excesses of climate change and reducing our carbon footprint. These should be focused on delivery based on the existing policy context with the SPPS and the recently adopted Plan Strategies and their supplementary guidance ([Adopted Belfast Plan Strategy documents and SPG](#)). A key consideration of this call should be not to confuse or hinder a lot of this good work by introducing ambiguity to the policy framework that could inadvertently cause difficulties around policy implementation. The SPPS's approach to mitigating and adapting to climate change and the importance of Ecosystems is sound. A greater focus need to be paid to implementation and its correlation with seemingly contradictory policies, particularity in relation to development in rural areas, including housing.

3) Can you provide any evidence on how and why the Department should update, revise, and improve the 'Core Planning Principles' in order to better support the Climate Change agenda? Please detail.

The Core Planning Principles in the SPPS are well founded, and largely derived from the European-wide planning approach to sustainable development. It is difficult to criticise objectives that seek to improve people's wellbeing, economic output, and improving and protecting the environment. They closely mirror the three pillars of sustainable development. As the emerging LDPs are also required to follow this approach and are legally bound to be assessed against the statutory requirements of the Sustainability Assessment, they should in effect if followed provide a strong policy basis for addressing the core issues associated with climate change. Issues such as reducing the need to travel and providing for sustainable transport, providing opportunities for renewable and low carbon energy technologies decentralising energy and heating and promoting low carbon design approaches to reduce energy consumption in buildings are already provided for. The implementation of policy is key and a major focus of the Department should be on ensuring its implementation and providing the mechanisms to ensure its delivery.

4) Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Flood Risk', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development is a crucial factor in assessing affected planning applications. The core principles of preparedness and mitigation against the worst effect of flooding in the SPPS are sound. The need to update guidance on climate projections and updates to flood maps are undoubtedly beneficial, but the current approach to consultations with the incumbent authority still provides for advice from appropriate experts. There has been a significant move in recent years at local authority level to bring forward both guidance and projects on the ground to deliver multi-functional green infrastructure, which can manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.

Planning has a key role at managing the interaction of development and flood risk. Clearly this approach needs to balance a variety of competing issues and it is important that flood risk does not decisively outweigh other factors that can help reduce factors that contribute to climate change. For example it would be easy to conclude that we only build in areas of low flood risk that merely create a greater dependence of car travel which ultimately contributes to the causes of climate change in the first instance.

5) Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Transportation', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

The planning system has an important role to play in supporting the priorities that can help to address climate change and there is a clear intent in the SPPS about improving connectivity, promoting more sustainable transport patterns and support the decarbonisation of the transport sector. Further it is acknowledged in the policy that it is imperative to reduce the need to travel and provide for sustainable transport. This is the correct strategic policy approach. The distribution and design of new development and the potential for servicing sites through sustainable transport solutions, are particularly important considerations that affect transport emissions. Sustainability appraisals should be used to test different spatial options in plans on emissions. This is evidenced in a myriad of academic and policy papers. Like many of the contributing factors of climate change the key factor is the implementation of this policy narrative. This does at a regional level mean a serious rethink about how and where we distribute housing and other development and its relationship to wider employment and services.

6) Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Development in the Countryside', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

The SPPS acknowledges the need to improve the health and well-being of our society, improve air quality and manages and mitigates against factors that contribute to climate change, it also acknowledges the benefits of the proximity principle which aligns the importance of locating housing at locations that can easily avail of employment and services. The objectives do appear to be somewhat at odds with the approach to the delivery of housing in the countryside. There is a clear need to address rural housing which encourages high levels of car ownership and more clearly acknowledge the correlation between creating critical population masses to support investment in necessary infrastructure. Again there is an abundance of evidence to support this approach and in many ways it is self evident. The levels of single car journeys into Belfast every morning and evening and the detrimental impact that that is having on often working class community in the city centre in terms of air quality, lung diseases and wider amenity issues with sporadic car parking are all direct consequences of this policy approach. Indeed the desire to repopulate our city centre and inner city communities is being stymied by the poor living environment created by cars. There is considerable evidence that using multiple modes to complete a single trip deters people from using public transport. Sporadic rural housing increases the propensity for multiple journey modes.

7) In light of the declared climate emergency and the requirements of The Climate Change Act (Northern Ireland) 2022, can you provide any other evidence on how and why the Department should update, revise, and improve the SPPS to better support the Climate Change agenda? Please detail.

In addition to supporting the delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, the SPPS should be more explicit in directing local planning authorities to ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.

Addressing climate change is one of the core land use planning principles which the SPPS expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act (Northern Ireland) 2022, and co-operate to deliver strategic priorities which include climate change.

In addition to the statutory requirement to take the Framework into account in the preparation of Local Plans, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. This complements the sustainable development duty on plan-makers and the expectation that Local Development Plans will contribute to the achievement of sustainable development. The Council supports the SPPS emphasis that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.