



SOUTH BELFAST PARTNERSHIP BOARD

Assembly Committee for the Environment
Communications Office
Northern Ireland Assembly
Parliament Buildings
Ballymiscaw
Stormont
Belfast
BT4 3XX

15 March 2013

Dear Sir/Madam

Re: Planning Bill – Committee Stage Consultation

I write to you in response to the current consultation on the Planning Bill by the Assembly Committee for the Environment. This response has been prepared by the South Belfast Partnership Board in consultation with a number of local community groups, business association and private sector partners in South Belfast. The South Belfast Partnership Board brings together all sectors – community, statutory, political and private – to strengthen and better target the efforts being made by the community, the private sector and the Government to tackle in partnership the economic, social and environmental problems which affect people in the most disadvantaged areas of South Belfast.

In general terms, we welcome the move to reform the planning system as part of Review of Public Administration (RPA), which we understand will see the transfer the majority of planning functions and decision making responsibilities to Councils in 2015. Prior to the full implementation of this, we welcome these current proposals to accelerate the introduction of a number of reforms to the planning system in advance. This, we believe, will help to improve the efficiency and effectiveness of the planning system, modernising and strengthen the planning system, particularly in relation to faster decisions on planning applications and enhanced community involvement.

However, within this context, we have outlined below a number of comments as they specifically relate to a number of the clauses set out in the draft Bill:

- **Clause 1: Statement of Community Involvement:** We welcome the move to bring forward the preparation of a Statement of Community Involvement (SCI) in the development planning process sooner, rather than later. This has been widely and successfully implemented in the English planning system for a number of years now and is most welcome as a means to improve the planning of development plans and

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specific development proposals. We understand that further regulations will be developed to shape how the new SCI should be developed and we would argue that involving community organisations and the public in the preparation of the SCI should be secured through the regulations (please also see our comments below in relation to pre-application consultation).

- **Clause 2: Sustainable Development:** Whilst we welcome the clarity that decisions with should be made within the objective of furthering sustainable development, we question the necessity of giving further specific objectives, such as “improving well-being”, “promoting economic development” and “achieving good design”. It is widely accepted that truly sustainable development should consider the relative impacts of development upon the environment, economy and society as a whole, carefully balancing these to secure the best outcome for both current and future generations.

As currently drafted, we believe these amendments could lead to too greater weight being given to one particular objective, such as economic development, at the expense of social well-being or the environment. If anything, the social aspect of development is often minimised or neglected, instead arguing that creating jobs through economic development is the greater good which justifies negative impacts upon the environment of those people living closest to the proposed development. We would request that these objectives be reviewed to better reflect the equal rating that should be given to all domains as part of a sustainable development approach.

- **Clause 5: Pre-Application Community Consultation:** We welcome the move to strengthen communities’ involvement in the development planning process, in advance of planning applications be submitted. If conducted correctly in a proactive and open way, this should help address any negative impacts of proposals on local communities at an early stage, improving the quality of proposals produced, reducing the risk of significant objections and expediting the decision making process once an application is submitted.

However, it is essential that this process is not just a tick box exercise for developers, but rather that it is meaningful engagement with openness and transparency in relation to what has been done as a result of consultation. We have experienced this recently as part of the planning for the Windsor Park development, but were concerned that the pre-application consultation completed by the IFA focussed too narrowly on the residents immediately adjacent to the stadium, but neglected to engage in meaningful consultation with the broader south Belfast communities. Given the strategic nature of this major development, we were disappointed that our only opportunity to engage the IFA was via Planning Service in response to the planning application, rather than in shaping the development from an early stage. Although their consultation did lead to a number of positive outcomes for local residents, we believe there were a number of broader issues and impacts beyond the immediate locality that were not adequately addressed, even in the final planning approval.

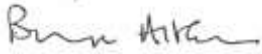
We believe that legislation and regulations should ensure that the Department take account of the scope of pre-application consultation, rather than whether it was undertaken and a report submitted with the planning application. Local communities should have an opportunity to comment on a developer’s consultation

report and request that further consultation is undertaken and amendments, if necessary, made to application before it is processed, etc.

We understand that there may also be issues over the threshold set for whether a development of a scale is large enough to warrant pre-application consultation and would request that the Department be allowed to apply discretion in requiring pre-application consultation. For example, if a major residential development is split into a number of smaller phases for planning purposes, the size threshold could be avoided in each case, but the overarching impact of all phases could be such to warrant broader pre-application public consultation.

We trust that you find these comments useful and look forward to seeing how they help shape the final Bill in due course. Please don't hesitate to contact my colleague Martyn Smithson on 02890 244 070 or martyn.smithson@southbelfast.org if you would like any further information or clarity in relation to any of our comments.

Yours sincerely



Brieghe Arthurs
Chief Executive
South Belfast Partnership Board

CC: Anna Lo MLA