

# Response ID ANON-MXT2-BYGQ-X

Submitted to Call for Evidence: Future Focused Review of the Strategic Planning Policy Statement (SPPS) on the issue of Climate Change  
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## Introduction

### Freedom of Information Act 2000: Confidentiality of Responses

## Background

### Why undertake a Call for Evidence?

## Purpose and Scope

### The Purpose of Planning

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.

Answer1:

It is important to note that there is currently no Climate Change Agenda for Northern Ireland, and the lack of a framework limits the provision of specific evidence as requested by this consultation. The Climate Change Act (2022) has set some guidance on overarching targets to meet for carbon emission reduction, including the net Northern Ireland emissions account for the year 2050 to be at least 100% lower than the baseline of 1990 and the methane emissions to be lower than 46% than the baseline. Besides that, the Energy Strategy established a renewable electricity consumption target of 70% by 2030, which was then increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022. 'The Purpose of Planning' section could be updated and revised to address climate change concerns by emphasising the importance of green infrastructure, sustainable development, and low-carbon practices in the planning process in line with the targets set in the Climate Change (Northern Ireland) Act 2022.

There is a need to identify indicators for measuring performance to highlight progress and transformational change. A lack of data and indicators can prevent making a judgement on progress in the delivery and implementation of mitigation and adaptation where planning could positively contribute. This needs to be addressed with urgency. Therefore, SNI suggest that the Department of Infrastructure create, in collaboration with other planning authority partners, a planning framework to define how to regularly assess the effectiveness of planning policies in addressing climate change goals and make adjustments based on evolving scientific understanding and changing circumstances. This also includes establishing monitoring and evaluation mechanisms within the planning framework. A good example is the Welsh Planning Framework, which includes Technical Advice notes (<https://www.gov.wales/technical-advice-notes>).

We recommend updating the section of the SPPS with details on the indicators that the Department intend to adopt. We suggest using the CCC Report 'Adapting to climate change' (April 2023) as a guideline to identify some of these indicators. In this report, with the renewed focus on achieving Net Zero, the opportunity to embed climate resilience into planning and avoid locking in decisions that can result in irreversible changes, increased damages, or higher costs when larger and faster action is required later is advised. Some examples in the report can be compelling guidance to set specific indicators: 'Transport - Monitoring of the rail network is increasing, but there is no reporting on weather-related delays or incidents. Available indicators for roads are limited and show poor conditions for local roads. While there is some consideration of climate projections within the design manual for strategic roads, there is limited adaptation planning in place and insufficient plans for local roads and rail. There was no evidence that interdependencies across infrastructure sectors are being managed'. 'Towns and cities. Monitoring properties at risk and coastal defence assets shows some progress in adaptation delivery, and there have been positive developments in planning for river and coastal flooding. While there has been progress on removing impermeable surfaces, data on the uptake of sustainable urban drainage systems remains limited and urban heat issues are not receiving detailed consideration at the local level. Planning policy (and, therefore potentially the new local development plans) are not sufficiently strong in their language to ensure meaningful action on climate adaptation in every decision. There is no legislation on managing coastal change, and the lack of long-term coastal management plans is a key gap for coastal communities. Significant research on coastal change has been completed, which should be used to develop plans'.

### Furthering Sustainable Development

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.

Answer2:

SNI would like to highlight the importance of generating Local Climate Impact Assessments of the local climate impacts, vulnerabilities, and risks. This information can provide the basis for incorporating climate considerations into planning objectives, ensuring that developments are resilient to future climate conditions. Besides that, we want to stress the need to collect, collate and utilise the latest scientific data and projections related to climate change. This includes information on rising temperatures, sea-level changes, extreme weather events, and other factors that may influence the region. This data can inform the planning process, making it more adaptive and resilient. Therefore, we recommend agreeing on and including a list of key data that would inform the planning process and guarantee the protection of areas of scientific interest from dangerous and controversial planning permissions that could compromise the integrity of the areas.

It is necessary to emphasise the importance of green infrastructure for encouraging and achieving sustainable development and low-carbon practices in

the planning process. This could involve promoting energy-efficient buildings, sustainable transportation, and green spaces that contribute to mitigation and adaptation efforts. SNI would like to suggest including low-carbon practices to make the planning process a valuable tool for mitigating climate change and fostering environmentally responsible development in line with a climate agenda of actions for emission reduction and building resilience. For example, consider incorporating in this SPPS section advice for compact urban design to reduce car dependency and the need for extensive transportation and minimise carbon emissions associated with commuting. Promoting the preservation and incorporation of green spaces within urban planning to help sequester carbon, contribute to biodiversity, and provide recreational areas. This can include parks, green belts, and urban forests. Encouraging the implementation of district heating and cooling systems that use centralised sources to distribute energy for heating and cooling purposes can improve energy efficiency and reduce carbon emissions compared to individual systems. Incorporating energy-efficient technologies in infrastructure projects, such as street lighting, traffic signals, and water systems, reduces energy consumption and lowers carbon emissions. As reported by the CCC, external factors that reduce resilience to climate change include pollution, habitat loss, degradation, fragmentation, spread of disease, pests, invasive species, overuse of natural resources, and coastal squeeze from sea-level rise. Therefore, pressure on the natural environment and resources should be reduced to increase places' resilience. We recommend the addition of a statement in this section of the SPPS as a commitment to make places more resilient by protecting and regenerating the natural environment and to reintegrating nature into urban planning design to implement biodiversity net gain (CCC Adapting to Climate Change Progress in Northern Ireland, April 2023).

## Core Planning Principles

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.

Answer3:

This section, among the others, is the most accurate regarding climate change response and sustainability alignment. SNI would like to recommend the adoption and integration of a regenerative approach that follows the principles of Doughnut Economics (DE), considering the planetary boundaries and the ecological ceiling at the forefront of planning, along with defining the minimum set of social standards and conditions that are deemed necessary for human wellbeing and dignified life.

Integrating DE principles into the core principles listed will help identify the safe and just space between the social foundation and the ecological ceiling, which is served by an economy that is regenerative and distributive by design. We highly recommend introducing the concept of Regenerative Design, which moves away from the degenerative, linear practice of "take, make, use, lose". It is an approach that aims to create resilient systems that actively restore and regenerate the environment. It involves designing processes, products and systems that "do more good" for ecological health and promote resource efficiency while enhancing social well-being.

Another principle we suggest including among the core principles is the Distributive Design, which moves from the divisive, centralising practice of concentrating opportunity and value in the hands of a few. This approach addresses social and economic inequalities by designing systems, policies, and interventions to distribute resources, opportunities, and benefits more equitably to create a just and inclusive society. We highly encourage using social and environmental indicators to identify impact categories and collect evidence from well-defined metrics. An example of a social indicator could be the percentage of Renewable Energy in the supply chain activities to support the transition to more renewable energy sources by adopting building materials sourced from producers whose energy comes from renewables. Another indicator could be the percentage of the community with easy access to social infrastructure facilities. A project in Copenhagen, The Tingbjerg Houses, is an example of healthy and inclusive development. The neighbourhood has been revitalised to create a more inclusive place for vulnerable residents with limited education, low income, high crime rates and unemployment (<https://nrep.com/project/tingbjerg/>).

We advise highlighting actions to pursue healthy ecosystems through planning and development standards following strategies to enhance and restore biodiversity and nature on-site. This means including design decisions that minimise the use of chemical fertilisers, prioritise sustainable maintenance practices, re-purpose converted land for construction, protect existing habitats, and prevent pollution. Adopting these strategies improves air and water quality resilience to climate change and enhances the overall wellbeing of both human inhabitants and wildlife populations. Again, using indicators can support this process, facilitating the measurement of progress. For example, the rate of outdoor air purification using coatings and nature-based solutions, the number of on-site biodiversity assessments conducted by qualified ecologists, and the percentage of nature-based solutions integrated into infrastructure design are among some potential indicators that could be included in the reviewed SPPS document.

## Subject Policies

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.

Answer4:

As stated in the consultation document, "the SPPS also recognises that the planning system should help to mitigate and adapt to Climate Change by working with natural environmental processes, for example through promoting the development of green infrastructure and also the use of SuDS to reduce flood risk and improve water quality" and that the introduction of new arrangements will help "to detail how SuDS can be approved as part of a potential approval process for developments and requirements for their ongoing long-term maintenance. SuDS can assist in managing flood and pollution risks from excess water and can benefit water quality, biodiversity, health, and public amenities". SNI agrees with this statement and would like to encourage the provision of details on how SuDS can be approved. The Planning Policy Statement 15 (PPS15) Annex C is focused on SuDS. It recognises the role of development in changing the natural drainage regime, that downstream flooding may be increased from new development, and that ecological damage to streams and streamside habitats may occur.

While the disposal of surface water has long been a material consideration in determining planning applications, amenity, ecology, and water resource issues have historically had limited influence on drainage system design and the determination of development decisions. To update this section of the SPPS, we suggest considering the water quality improvements stated in and required by the European Community Water Framework Directive because continuing to drain built-up areas without considering these wide issues can no longer be an option. A range of legislation and policies promote SuDS in Northern Ireland, but currently, Northern Ireland does not have technical standards for SuDS. In September 2015 the NI Assembly published a Sustainable Drainage System provision within the Water and Sewerage Services Bill

(<http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2015/regdev/10015.pdf>) In the document we can read "however, there is not currently a statutory requirement, nor are there sufficient incentives, to encourage the wider use of SuDS". Currently, Northern Ireland has not even got non-statutory technical standards for sustainable drainage systems in contrast to England and Wales where, respectively in 2015 and 2016, non-statutory technical standards were published. Local authorities have started developing supplementary planning guidance to promote the preferred approach under the subject policy 'Planning and Flood Risk' contained within the SPPS. We advise including a list of common misunderstandings and a review of evidence to support the SuDS use and implementation planning process. An excellent example is provided in the Supplementary Planning Guidance of Belfast City Council Sustainable Drainage Systems, redacted by Robert Bary Associates and McCloy Consulting (2023).

We also recommend adding the definition of retrofitting SuDS to regenerate urban environments while reducing flood risks and addressing the issue of water quality management by promoting this more sustainable and regenerative approach. New builds only make up a small part of our current urban areas, so whilst the implementation of SuDS on new developments is essential, the impact of retrofitting SuDS in existing urban areas is likely to offer more opportunities for increasing flood resilience of cities.

Such measures provide a more joined-up approach to managing surface water across wider areas, supporting the water cycle, helping green urban areas, and generating multiple benefits in line with an ecosystem services approach. SuDS can also be cheaper than traditional solutions and nearly always provide more benefits. In particular, those that use green infrastructure can improve the urban environment and air quality, enhance biodiversity and create better places to live. Many examples from around the world also show that reducing surface water from entering an existing drainage system through retrofitting can be more cost-effective than increasing drainage capacity (e.g. Green City, Clean Waters in Philadelphia and the Green Streets approach in Portland, Oregon) (Susdrain <https://www.susdrain.org/delivering-suds/retrofitting/why-retrofit/why-change.html>).

Retrofitting of SuDS is beginning to happen in the UK, and a growing number of case studies are emerging that demonstrate how successful SuDS can positively impact communities, ecosystems, and finances. Welsh Water, in partnership with Cardiff Council and Natural Resources Wales, have been instrumental in promoting the retrofit of SuDS through its award-winning Greener Grangetown scheme, which involved SuDS retrofit in central Cardiff. It is widely considered an excellent example of the benefits gained from a well-designed and implemented retrofit of SuDS. Water and Wastewater Treatment reported on how the scheme takes inspiration from schemes in Malmö, Sweden and Portland, Oregon, where a more eco-friendly and attractive area has been delivered with substantially reduced costs. The project involved trees, planters, grass channels, drainage curbs and rain gardens being installed across 12 existing residential streets, with water being cleaned and diverted into the River Taff and over 40,000 cubic metres of surface water being removed from the sewer network each year.

In general, the United Kingdom has little experience retrofitting SuDS, and there are few defined methods for determining if they would be worthwhile or cost-effective. However, the projection of this technology continues to be of increasing interest, and stakeholders and researchers have sought to establish strategies for raising the relevance and acceptance of SuDS in the UK. Installing green roofs, using garden soakaways, and directing road runoff into ponds via roadside swales are a few examples of retrofitting SuDS. These represent alternative ways of improving water quality downstream, providing a more effective, resilient, and sustainable approach (O. Olandunjoye et al. 2022 <https://doi.org/10.3390/w14162521>). We highly encourage the Department to provide details on integrating this approach into the planning regulations and processes.

## Subject Policies (continued)

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.

Answer5:

SNI would like to encourage the promotion and design of compact, mixed-use urban development, which reduces the need for extensive transportation and minimises carbon emissions associated with commuting. It promotes walkability, cycling, and the use of public transportation.

We recommend considering Transit-Oriented Development (TOD); designing developments around public transportation hubs encourages the use of public transit and reduces dependence on private vehicles. TODs often feature higher-density, mixed-use developments near transit stations. It is crucial to develop building sites well connected to public transport. This means promoting active transportation that encourages walking and cycling by providing pedestrian-friendly infrastructure, bike lanes, and pedestrian pathways that reduce the carbon footprint associated with short-distance travel. This can bring increased public transport use and fare revenue, reduced congestion and air pollution, increased job availability, convenience and a sense of community for residents, and a motivation to build homes without increasing sprawl or exacerbating air pollution and congestion. It also comes as a natural consequence considering the development of a complementary 15-minute city/neighbourhood vision, where the planning idea strives to ensure that everyone, everywhere can meet most of their daily needs within a short walk or bike distance from their home. A more human-centred approach with both visions mutually supporting each other. We would like to see included in the SPPS guidance for the planning authorities for setting TOD targets to send a clear signal to developers and citizens regarding their future development approaches. Once again, establishing indicators will be essential for that; for instance, the percentage of the population living in TOD zones, the percentage of new development within a certain radius of transit stations, the percentage of the population with access to public transport, etc. It would also be important to update regulations to align land use and planning regulations with transit strategies, ensuring investment in attractive public transport. Therefore, we would like to encourage more collaboration between transport control and planning authorities to develop a joint strategy for delivering TOD (C40 How to Implement transit-oriented development).

## Subject Policies (continued)

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.

Answer6:

We recommend setting a list of national developments to support the delivery of sustainable places and a strategy for revitalising rural areas. The National Planning Framework of Scotland includes points like the pumped hydro storage to extend hydro-electricity capacity to support the transition away from fossil fuels while providing employment opportunities in rural areas. SNI wants to advise adding the 20-minute neighbourhoods strategy to rural areas without forgetting to apply a place-based approach. The example of Scotland being the first nation to adopt it as part of a countryside approach to spatial planning should be adopted and adapted to Northern Ireland. A 20-minute neighbourhood allows residents to meet most of their daily needs (shopping, leisure activities, schools, healthcare and access to green space) within a 20-minute walk or cycle from home. In June 2022, an

in-depth report demonstrated how three simple adjustments could be made to tailor the policy for the Highlands and Islands: embracing sustainable transport rather than simply walking and cycling, treating 20 minutes as a target rather than a requirement, and ensuring the language and tone of the policy encompasses rural as well as urban Scotland.

'Smart Clachans' are an example that responds to depopulation and climate change. Based on the traditional Scottish clachan of a close-knit community with shared barns and vegetable-growing areas, the Smart Clachan combines the built form of a traditional rural settlement with affordable housing and shared facilities, such as heating, electric vehicles, cooperative growing spaces and a community work hub. Examples like this demonstrate what can be achieved through a rural interpretation of the 20-minute neighbourhood concept and when investments are committed to reducing emissions and improving people's lives. SNI advise supporting and encouraging people to live more locally, whereas rural estates are well placed to play their part through, for example, the provision of rural homes, connecting paths and cycle routes, shared community facilities and the sale of local produce (Scotland's 20-minute neighbourhood in a rural context, Savills), and to follow excellent examples of community growth and wellbeing when supported by smart planning.

## Subject Policies (continued)

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.

Answer7:

We noticed no mention of the environmental impacts and emissions associated with the supply chain, which is essential in planning and designing better places.

To align the update of the SPPS with the Climate Agenda, it would be relevant to include measures to minimise transport impact associated with extraction, manufacturing and production processes in the supply chain that contribute to the planning process.

We recommend including notes to encourage collaboration with suppliers with locally based operations to agree on the same guidance when planning; therefore, setting a clear framework for that would be essential.

SNI would like to stress the importance of providing indicators to monitor and track the progress of projects and assets, for example, looking at the ratio of regional materials used and transport-related emissions.

Another key point to consider is the waste management associated with the built environment and the need to define it at the design and planning stage, establishing a tracking measure to quantify the reused resources and waste generated/reduced in the supply chain. This would contribute to reducing emissions associated with resource transport and integrating sustainability at the design stage of the planning process since we noticed no mention of Circular Economy throughout the SPPS document.

## Summary of Questions

### Your Details

8 Your name:

Your name:  
Dr Francesca Di Palo

9 Your contact details (preferably email):

Contact details:  
francesca@sustainableni.org

10 The organisation you represent (if applicable):

Your organisation:  
Sustainable Northern Ireland

11 Your main area of interest:

Local Government

## Next Steps