



Department of the  
**Environment**

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## **PUBLIC CONSULTATION**

# **Planning Policy Statement 24: Economic Considerations**

## **SYNOPSIS OF CONSULTATION RESPONSES**

**AUGUST 2011**

# SUMMARY OF CONSULTATION RESPONSES

## Introduction

1. On 17th January 2011, the Department issued for public consultation draft Planning Policy Statement (PPS) 24 setting out guidance on the weight that should be accorded to economic considerations in the making of planning decisions.
2. As part of the consultation process copies of the draft PPS were distributed to approximately 350 interested parties, including all Assembly Members; all 26 District Councils, Government Departments and external stakeholders. Notice of the publication of the draft PPS and the commencement of the consultation period was given in the Belfast Telegraph, Irish News and Newsletter on 18 January 2011. The document was also made available on the Planning NI website. Consultation responses were requested by 6 May 2011. All the responses received will be taken into account by the Department in finalising the document.
3. This paper provides a general overview of the main findings of the public consultation exercise. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues and main recommendations raised in the responses.
4. The Department would take this opportunity to thank all those who contributed to the consultation exercise.
5. A list of all the respondents who responded to the public consultation is provided at Appendix A. A copy of the individual responses will be made available shortly on the Planning NI website [www.planningni.gov.uk](http://www.planningni.gov.uk).

## Overview of Consultation

6. The Department received a total of 133 responses to draft PPS 24 from a wide range of interests which can be broken down into the following categories:

**Table 1:** Categories of Respondents

Category	No.	%
(a) Professional Bodies (i.e. Legal / Architects / Planners)	8	6.0
(b) Environment & Heritage Groups	24	18.0
(c) Resident/Community/Voluntary Groups	13	9.8
(d) Business & Development Organisations	14	10.5
(e) Non-Departmental Public Bodies	6	4.5
(f) Local Government / Political Parties	12	9.0
(g) Individuals	52	39
(h) Other	4	3.0
<b>TOTAL</b>	<b>133</b>	<b>100</b>

7. Overall, the majority of respondents (103 or 77.4 %) oppose the introduction of draft PPS 24 in its current form. 27 (20.3 %) expressed unequivocal or qualified support for the draft policy. The opinion of the remaining 3 (or 2.3 %) respondents is not so clear cut.

### **Summary by Category of Respondent:**

8. The following comments summarise the main findings from the public consultation exercise by each category of respondent. A complete record of the key issues raised, and the main recommendations to the Department are detailed at Appendix B.

#### **(a) Professional Bodies**

9. 5 out of 8 respondents in this category offered qualified support for PPS 24. However, a number of recommendations for improving PPS 24 were put forward, including:
- Remove the last sentence within EC1 on determinative weight
  - Provide more guidance on the approach and mechanism for assessing economic implications.
  - More information on the policy parameters i.e. what is considered significant economic implications.
  - Provide more emphasis on the principle that social, and in particular, environmental considerations must also be taken into consideration and balanced against economic implications
  - Clarification on how economic considerations will be balanced against broader strategy, policy and legislation.
  - Requiring a Strategic Environmental Appraisal (SEA).

## **(b) Environment & Heritage Groups**

10. All 24 of the 'Environment and Heritage Groups' who responded to the public consultation were opposed to draft PPS 24, with many calling for it to be withdrawn.
11. 8 Angling Clubs / Associations attached the Ulster Angling Federations submission by way of response to the public consultation. They are all concerned about the potential adverse effects of PPS 24 on rivers and lakes, and highlight the work undertaken in the conservation of good water and catchment quality.
12. The main recommendations for improving PPS 24 include:
  - The need to independently inspect all cases with economic considerations.
  - PPS 1 being the most appropriate vehicle to assess weight of economic, social and environmental concerns.
  - Remove the concept of determinative weight.
  - The need for clarification on how such planning decisions would be considered to allay fears of inappropriate development in aquatic environments.
  - Requiring a Strategic Environmental Appraisal (SEA).

## **(c) Residential/Community/Voluntary Groups**

13. There were 13 substantive responses from 'Residential /Community and Voluntary Groups'. 11 respondents in this category were generally opposed to draft PPS 24. The remaining 2 respondents expressed broad support for the proposed policy direction.
14. Those that objected considered it wrong to afford economic consideration greater weight than environmental and social considerations, and considered that the policy does not take into account the long term impact of giving 'determinative weight' were economic implications are significant and substantial.
15. Recommendations for improving PPS 24 from this category of respondent include a number of suggestions on changes required to the wording of Policy EC1. For example one respondent suggested the addition of the line, ***“the proposal should secure a long term public benefit that decisively outweighs the disadvantages of setting aside normal policy presumptions.”*** Another respondent recommended that the following wording be inserted - ***“applications should demonstrate how the proposal will be developed according to sustainable development principles.”*** A number of respondents recommended the deletion of the second paragraph of policy EC1 to support the Programme for Government.

#### **(d) Business & Development Groups**

16. 12 of the 14 responses received from 'Business and Development Groups' were broadly supportive of draft PPS 24, but many expressed uncertainty about its application. Some respondents highlighted that there is no indication of time period over which economic implications are to be assessed. Others commented on the policy being unnecessary given the existing policies contained in PPS 1 and PPS 4.
17. Main recommendations for improving PPS 24 from business and development groups include:
  - The main purpose and benefits of PPS 24 require clarification and must reference the sustainability of economic implications.
  - The policy should explain how Policy EC1 can be reconciled with the Plan Led System.
  - The document should make clear that the Department will require the provision of comprehensive information at the outset of the application process – and will analyse both positive and negative impacts to ensure a balanced and informed decision making process.
  - Amending Policy EC 1 to state the importance of 'public interest' and 'no demonstrable harm'.
  - A requirement to qualify that 'determinative weight' must be seen within the context of overall planning balance.
  - Strategic Environmental Appraisal (SEA) is required.

#### **(e) Non-Departmental Public Bodies**

18. There were 6 substantive responses received from 'Non-Departmental Public Bodies'. Opinions were split over the emerging planning policy. The Northern Ireland Tourist Board is supportive of the draft policy, whilst the HBC, HMC, MAG and CNCC are opposed to draft PPS 24. The opinion of the remaining non-departmental public body is unclear.
19. Key issues raised by this category of respondent include: key terminology not being adequately defined; concern that determinative weight would skew decision making away from sustainable development and protection of the environment, and; short term gains may be promoted without full consideration of economic social and environmental factors as set out in the RDS.
20. Main recommendations for improving PPS 24 include:
  - Clarification of terminology including; Significant, substantial, economic implications, proportionate and sufficient.
  - A 'proper' assessment of economic implications requiring specialist teams and /or independent consultants.
  - Additional criteria should be added if the proposal is contrary to other planning policies ensuring that the development provides a

- The PPS should make clear that all economic development should be sustainable and not damage the natural and built heritage.

**(f) Local Government / Political Parties**

21. 9 of the 26 district councils responded to the public consultation to which there has been a mixed reaction. Draft PPS 24 was supported by Fermanagh District Council; Lisburn City Council; Armagh City and District Council; Antrim Borough Council; and; Ballymena Borough Council. However, Ards Borough Council, Belfast City Council, Castlereagh Borough Council and Craigavon Borough Council expressed opposition to PPS 24 in its current form. The Irish Labour Party, the Northern Ireland Local Government Association (NILGA) , and Arc21 (embracing eleven Councils located along the Eastern Region of the North) also responded by expressing opposition to the draft PPS.
22. Key issues include: concern that the policy will fundamentally undermine existing planning policies aimed at ensuring orderly social and spatial development and environmental protection; facilities already exist to take decisions based on economic considerations; the lack of resource and expertise to assess economic implications, and; concern that the policy is detached from the RDS which specifies a hierarchy for types of development linked to settlement size and transport links.
23. Main recommendations to the Department from this category of respondent include:
  - More guidance on how weighting of applications is applied and on how consideration is given to short /medium /long term implications (with weighting strengthened towards long term sustainable development).
  - The second paragraph of Policy EC 1 should be omitted.
  - Economic implications should only tip the scales in favour of proposed development when it is shown that there will be no demonstrable harm to environmental and social interests or
  - Amend PPS 1 instead (a preferred option for some respondents).

**(g) Individuals**

24. Of the 52 responses received from individuals, 28 of these comprised comparable petition-style letters of objection. These objection letters suggested that it is quite wrong to allow economic considerations to override environmental and social considerations; that PPS 24 will enable development to take place at the expense of the quality of life and health of ordinary individuals; and it will make it prohibitively

25. Main recommendations for improving PPS 24 from individuals include:
- additional wording to allow for flexibility to include other considerations with the same weight and cross references to other material considerations.
  - Not advancing the introduction of PPS 24 without key counter balancing policies such as PPS 2.

#### **(h) Other**

26. There were 4 respondents classified as 'Other'. 1 of these was broadly supportive, 2 were generally opposed to the draft policy, whilst the opinion of the remaining respondent was unclear.
27. Key issues raised by this category include a belief that there is no need for a specific policy on economic considerations as these are already covered in PPS1 and PPS 4, and a view that social and environmental considerations should be given appropriate attention as they can contribute to economic prosperity.
28. Main recommendations for improving PPS 24 include:
- Amending policy wording to ensure value of built heritage is not compromised for minor economic considerations, as follows:-  
“*where the economic implications of a proposal are **highly significant, substantial weight shall...***”
  - To provide definitions of ‘**substantial**’, ‘**Determinative Weight**’ and ‘**significant**’ economic implications.

## **Departmental Response**

29. The issues raised by consultation respondents are fundamental. They cannot be addressed simply by amending the document. The Environment Minister has therefore decided not to pursue PPS24. Instead economic, social and environmental considerations will be addressed together as part of a comprehensive and fundamental review of planning policy which will result in the more strategic, simpler and shorter policy which will be needed in advance of planning powers transferring to councils.
30. As no weight has ever been given to draft PPS24 in the determination of planning applications, this response is not relevant to planning decisions already made, nor to consideration of those currently in the planning system.

### List of Respondents

In total, the Department received 133 substantive responses to the public consultation. The groups and organisations who responded are listed below. In addition, 52 responses were received from individuals whose names are not listed.

#### **Professional / Legal / Architects / Planning (8):**

- Blamphin and Associates
- Corvus Environmental Consulting
- The Environmental and Planning Law Association for Northern Ireland
- Michael Burroughs Associates
- Royal Town Planning Institute Northern Ireland
- Development Planning Partnership LLP
- Rosetta Design Services Ltd
- Todd Planning and Architects

#### **Environment & Heritage (24):**

- Biodiversity Officers Forum
- Royal Society for the Protection of Birds
- Roe Angling Association
- Castleberg Angling Association
- Countryside Alliance Ireland
- Dundrum Angling Club
- Iveagh Angling Club
- Lecale Conservation
- Friends of the Earth Northern Ireland
- Kilkeel Angling Club
- Northern Ireland Environment Link
- Holywood Conservation Group
- Rathfriland Angling Club
- The National Trust

- Ulster Angling Federation
- Bangor Angling Club
- Ulster Architectural Heritage Society
- Ulster Wildlife Trust
- World Wildlife Federation Northern Ireland
- The Loughs Agency Ireland
- Omagh Anglers Association
- RSUA Conservation Committee
- River Faughan Anglers
- Enler Valley Green Belt Association

**Resident/Community/Voluntary (13):**

- Belfast City Airport Watch
- Causeway Coast Communities Consortium
- Community Places
- Community Organisations of South Tyrone and Areas Ltd
- Communities Against Lough Neagh Incinerator
- Cookstown and Western Shores Area Network
- Cultra Residents' Association
- East Down Rural Community Network
- Lagan Valley Group Residents' Associations
- Northern Ireland Council for Voluntary Action
- Northern Ireland Federation of Housing Associations
- South Belfast Community Support Group
- Belfast Civic Trust

**Business & Development (14):**

- ASDA Stores Limited
- B9 Energy Offshore Developments / THETIS Energy Ltd.
- Belfast International Airport
- Central Craigavon Limited
- Confederation of British Industry Northern Ireland

- Construction Employers Federation
- GML (NI) Ltd
- Institute of Directors
- Northern Ireland Independent Retail Traders Association
- Northern Ireland Renewables Industry Group
- Quarry Products Association Northern Ireland
- Sainsbury's Supermarkets Limited
- Sprucefield Centre Limited
- Ulster Farmers Union

**Non-Departmental Public Bodies (6):**

- Historic Buildings Council
- Historic Monuments Council
- Northern Ireland Housing Executive
- Northern Ireland Tourist Board
- Ministerial Advisory Group
- Council for Nature Conservation and Countryside

**Local Government / Political Parties (12):**

- Arc 21
- Ards Borough Council
- Armagh City and District Council
- Antrim Borough Council
- Ballymena Borough Council
- Belfast City Council
- Castlereagh Borough Council
- Craigavon Borough Council
- Fermanagh District Council
- Irish Labour Party
- Lisburn City Council
- Northern Ireland Local Government Association

## **Individuals (52)**

### **Other (4):**

- The Theatres Trust
- Belfast Healthy Cities
- Forum for Alternative Belfast
- Southern Waste Management Partnership

### **Key Recommendations & Main Issues by Category of Respondent**

#### **Category A: Professional / Legal / Architects / Planners (8)**

##### **Key Recommendations:**

- A statement that (1) recognises that major schemes with potential economic considerations be processed as quickly as possible in accordance with current established policies, and (2) prioritises major schemes limited to the time required to process.
- Need to clarify terminology
- An amendment to PPS 1 is more appropriate
- Provide more detailed guidance on the approach and mechanism proposed, and parameters for acceptable development.
- Requires a commitment that the decision taken under any such policy will not undermine existing strategy, policy and legislative requirements.
- The final sentence must be omitted from Policy EC 1
- J & A requires more detail
- Clarification should be provide on whether or how economic factors will be balanced against statutory requirements
- Requires guidance on how to measure the appropriate weight to be given to economic proposals in the context of all other material considerations.

##### **Main Issues:**

- Will lead to ambiguity & confusion in considering planning applications
- the time taken to process applications is holding up economic development, not the policies
- PPS is too short, lacks explanatory material or guidance and does not define terminology
- There is a lack of detail as to how applications are to be assessed and weighted
- Requires SEA
- PPS 24 may override/undermine existing policy in development plans, strategies and other policies that have been subject to public consultation and SEA
- Established policy regarding the approach to economic considerations is already contained in PPS 1 (para 10) / PPS 24 is a departure from this
- Logical home for such policy is through a revised PPS 1
- EC 1 conflicts with the principles of sustainable development
- No 'sustainability scan' has been undertaken as required by the Sustainable Development Strategy for Northern Ireland

- PPS 24 will undermine the EIA procedure
- Will lead to decisions which will be subjected to legal challenge
- EC 1 cannot be applied equitably
- Will lead to direct conflict with statutory obligations
- Economic implications are already a material consideration / PPS 24 is not required
- Will delay economic development
- Policy is inconsistent with Article 3 of the Planning Order
- Other important considerations cannot be set aside for financial gain.
- EC 1 will be used to put pressure on the planning system to promote all development proposals that claim significant economic implications without due regard to the environmental effects of proposals
- EC 1 needs to be clear and unequivocal in its meaning and interpretation, not least in regard to defining what is considered 'significant' economic implications
- Note status of draft PPS but refute the Department's stance that dPPS 24 should not be taken into consideration.
- Will PPS 24 allow development where adverse impacts upon the integrity of a protected habitat are considered likely, owing to issues of overriding public importance

## Category B: Environment & Heritage Group (23)

### Key Recommendations:

- PPS 24 should be withdrawn
- All cases with economic considerations should be independently inspected
- Guidance needed on terms
- Sustainable development should be at the forefront of any planning policy making
- Urge inclusion similar to SPP (para 33) which defines sustainable economic growth
- Insert a comma after aspects
- Requires SEA
- PPS 1 is the appropriate vehicle to assess weight and significance of economic, social and environmental concerns.
- Concept of determinative weight should be withdrawn
- In determining economic applications planning authorities should weight market and other economic info alongside social and environmental information
- Replace “shall” with “may” in EC 1
- Clarification needed on planning decisions could be determined to allay fears of inappropriate dev and proper protection of the aquatic environment

### Main Issues:

- Opposed to its introduction
- Economic considerations are not the only PfG priority
- Will fundamentally alter the basis of the planning system
- Will undermine public confidence in the planning system
- No definitions or guidance on terms
- Will conflict with national, EU directives / nature conservation designations / and lead to infractions
- No J & A is provided
- Does not accord with PPS 1 approach, PPS 2, and PPS 4
- Contrary to the plan led system
- Economic implications are already a material consideration
- Question whether proposals that only **may** bring investment are appropriate for such fast tracking
- Risks non compliance with other legislation
- What evidence has been used to complete the EQIA
- Disagree with section 1.2 of EQIA as needs of the whole community go beyond short term gain.
- EQIA statement that the policy would benefit the whole community at a regional, sub-regional and local context is misleading.

- Inequalities will arise from inability of some s75 groups to challenge developments
- Will have a negative effect on sustainable development
- Conflicts with the statutory purpose for planning enshrined in the planning bill.
- Will weaken and slow down the planning system by increasing the likelihood of legal challenge, contributing to confusion in the interpretation of planning policy and creating inconsistency in decision making
- Will be unworkable because it is vague and there is a lack of tradition, expertise and skills within the planning system to assess economic appraisals
- Policy is premature until PPS 1 is revised and out of time as a new statutory purpose of planning has been passed by the Assembly
- Prejudices the interest of SMEs
- Requires SEA
- Will be used to fast track large projects for the short terms gain of developers
- Economic benefits will be exaggerated.
- Does not make clear state spatial extent and timeframes, and potential negative effects
- Will be used to undermine effective enforcement by providing an argument for retrospectively approving unauthorised environmentally damaging developments
- Is in sharp contrast to guidance within PPS 4 which makes clear that PPS 4 policies do not replace or override other national policies.
- Fails to acknowledge that significant economic implications per se cannot enable an application which cause unacceptable environmental impact to protected areas.
- Fails to enshrine the requirement of the Brundtland Commission for sustainable development
- May be at odds with the NI Sustainability Directive and the EU SEA Directive
- Does not set out the method to exercise due diligence when appraising assessments in contrast to PPS 23
- Essential that the policy's principles be reconsidered
- Concerned about the possible effects on rivers and lakes
- The brevity of PPS 24 is to be commended
- Makes a nonsense of all other planning guidance

## Category C: Resident/Community/Voluntary (13)

### Key Recommendations:

- Opponents of particular applications require early and full access to economic assessments submitted by applicants.
- Terms 'significant' and 'substantial' should be defined
- First line of Policy should read '**Full account may be taken...**'
- To support of Programme for Government recommends deletion of second paragraph.
- **"..in such cases, substantial weight can mean determinative weight"** should be deleted.
- Must have regard to proposals suitability with their location.
- EC1 should impose a requirement for an applicant to prepare full economic appraisal.
- Additional resources will have to be secured to properly assess economic appraisals.
- Department should make clear that policy is not an attempt to avoid requirements of Habitats directive by elevating economic benefits.
- 'Economic Considerations' is far too general – suggests '**economic which will advantageously affect the community as a whole in the long term**'.
- All economic implications should be independently investigated to confirm validity.
- EC1 should include; "**The proposal should secure a long term public benefit that decisively outweighs the disadvantages of setting aside normal policy presumptions.**"
- D PPS 24 should refer to 'net economic implications' because proposals can have positive and negative implications.
- EC1 should include; "**The application should demonstrate how the proposal will be developed according to sustainable development principles.**"

### **Main Issues:**

- Weight should not be attached to '**significant economic implications**' as a determining factor.
- Wrong to afford economic consideration greater weight than Environmental / Social considerations
- If adopted will lead to conflict with Human Rights Act & Aarhus Convention
- Appears superseded/redundant by Planning Bill (Re: duty on sustainable development)
- EC1 does not explain how full account shall be taken of economic implications.
- Without additional resources to assess economic implication policy is meaningless
- Facilitates 'regionally significant' applications at cost of local / Sub-regional
- Applicants likely to be bias in evaluation of 'economic implications'
- Proposed policy would be unsafe without regional policy framework to evaluate purported gains.
- Screening analysis is seriously misguided – policy highly likely to impact unfairly on areas of social need / peoples daily lives / social & human rights in disadvantaged areas.
- Draft PPS 24 could provide a 'loophole' to allow applicants to overrule and undermine intentions of Planning Bill.
- Welcomes EC1 enabling the planning system to support the Programme for Government.
- Objection to economic implications outweighing other considerations – opening door to Political / Legal Challenge.
- If economic considerations are given precedence land now zoned for housing/community or Environmental use could be developed for economic use.
- No indication on how economic implications will be assessed.
- Does not distinguish between proposals within settlements and those in countryside.
- Unfair for '**substantial**' weight to actually mean '**determinative weight**' to those whose quality of life could be affected by such decisions.
- Residents do not have time/expertise/knowledge/finances to do necessary research to oppose such applications.
- Draft PPS 24 is out of step with RDS hierarchy for types of development linked to settlement size / transport link.
- PPS24 does not state spatial scale over which economic impacts should be assessed.
- Does not take into consideration long term impact of giving '**determinative weight**' were economic implications are significant and substantial.
- Draft PPS 24 could make policy recommendations of all Development plans, strategies and development frameworks redundant.
- Concern that PPS 24 will distort priorities of RDS and if agreed (in current form) would influence any negotiations for a new Programme for Government.

- Likely to create considerable uncertainty between councils and government regarding plan led system.
- Concern that S75 groups may not be able to challenge developments approved because of economic considerations.
- Department should have published the 'Sustainability Scan' prior to issuing dPPS24 (as required by NI executives Sustainable Development Strategy).
- Applications marking departure from Development Plan should be treated as regionally significant applications.
- Important that Social and Environmental effects are carefully assessed (and detrimental impacts mitigated).
- Development Plan should be primary means to identify appropriate land for employment / economic uses.
- Financial implications must be assessed accurately – may require a specialist team.
- In current form will enable development at expense of quality of life/health of 'ordinary people'
- Prohibitively expensive for local communities/individuals to oppose applications.
- Will enable large scale commercial development to detriment of residential amenity/small businesses.
- Focus on creating jobs without balancing costs to environment and society.
- Draft PPS 24 could breach statutory duty (Article 3 Planning NI order 1991) by dismissing plans/policies.
- Dismissing Plans/strategies could contravene plan-led approach.

## Category D: Business & Development (14)

### Key Recommendations:

- The statement under EC 1 “where the economic implications of a proposal are significant” must reference the sustainability of economic implications.
- Purpose and benefits of PPS 24 are unclear and require clarification
- Need to impose a requirement to provide a full economic appraisal of proposals in line with the HM treasury and DFP Green Book.
- Requires clarification of terminology
- Need to clarify whether determinative weight would be given to the economic implications of a proposal which delivers significant benefits to a region within NI or to a section of the population but which is economically detrimental to NI as a whole when objectively assessed.
- Policy should explain precisely how EC 1 can be reconciled with the plan led system.
- Need to clarify whether under EC 1 applications with significant economic benefits are to be elevated to the status of overriding public importance for the purposes of the Habitats Directive.
- Need to state that the policy is not intended to allow development which could cause unacceptable environmental impact to protected areas (such as Belfast Lough)
- In light of the scope of PPS 24 it is considered that a policy change that seeks to change the guiding principle of development management should properly be introduced through a revision to PPS 1.
- The explanatory test under EC 1 should state that the Dept will require the provision of comprehensive information at the outset of the application process and will robustly analyse positive and negative effects to ensure a balanced and informed decision-making process.
- EC 1 should only apply to ‘marginal situations’ / regionally significant proposals
- EC 1 should be amended to state the importance of ‘public interest’ and ‘no demonstrable harm’ ;
- EC 1 should state the complexity of decision making vis a vis para 10 of PPS 1
- Delete sentence on ‘determinative weight’
- Need to provide clear measurable criteria in relation to economic considerations to be achieved and an indication as to the weight of these criteria and how they will be assessed in relation to existing PPSs.
- The only objective assessment that can be carried out would be if an Economic Appraisal becomes a requirement of EC 1 – short form for minor applications.
- Final policy should ensure that it is able to distinguish robustly between speculative and deliverable projects

- Should give greater weight to firm development proposals that are either endorsed by named operators or where the Dept is satisfied that it has been demonstrated that the development will progress to site.
- Further guidance on the information to accompany applications is required
- Seek further clarification on the strategic objectives of the policy
- Need to qualify that 'determinative weight' must be seen within the context of the overall planning balance, perhaps by way of including this element of policy (or a commentary on it) in lower case text.

#### **Main Issues:**

- Document is seriously deficient
- Economic considerations are already a material consideration / unnecessary
- In some cases it may be impossible to assess the economic implications of a project in the absence of a regional strategy which would set out where particular forms of investment should be focused.
- No indication as to the time period over which economic implications are to be assessed.
- Para 4 - PSP 24 does not fulfil this stated objective of providing guidance
- Appropriate that draft PPS 24 is given no weight until issued in final form
- Will need to be in general conformity with the RDS
- Not clear what change in the Depts PPS 1 that dPPS 24 is seeking to introduce / assumed that it is seeking to relegate the principle of 'demonstrable harm'
- Requires SEA
- The suggestion that PPS 24 is restricted to weight is unhelpful and confusing
- Confuses the decision making process and may well increase legal challenges to planning decisions
- Applicants will not set out the negative implications
- EC 1 does not differentiate between short term and long term implications
- Does not make a distinction between land within settlement and the countryside. This would be in conflict with a wide range of existing regional planning policies/ act in the private interest not the public interest.
- Specific guidance on the weight to be accorded to economic considerations emphasises the importance of securing economic growth as the Executives top priority.
- It is vital that the planning system is increasingly flexible when adapting to the challenges facing the regional economy
- proposals that may bring investment should be processed as quickly as possible.
- By making clear that substantial weight can mean determinative weight is a helpful clarification

- PPS 24 is welcomed
- Policy can be agreed in support of any proposals. This is a welcomed flexibility.
- Essential that strategic policy exists to allow innovative, sustainable and economically beneficial mast plan visions.
- If a proposal claims to create new jobs but results in the loss of existing jobs it is of little value to the local economy
- Much of what is outlined in PPS 4 is already incorporated within PPS 4 / anything further should be through an amendment to PPS 4
- It is unclear as to the weight to be given to existing PPSs
- Will conflict with other PPSs, including PPA 5
- Existing PPS s must have greater weight over a generalist policy that cannot be measured
- Lacks guidance / aims of PPS 24 are not really fulfilled
- There are no criteria to be met
- Welcome purpose of PPS 24 but uncertain about application and use
- How is the quarrying industry to be viewed under PPS 24
- EC 1 second statement is unclear

## Category E: Non-Departmental Public Bodies (6)

### Key Recommendations:

- Applications should be subject to provisions for controlling regional significant developments in line with planning reform proposals and the Planning Bill
- Applicants must demonstrate why proposals cannot be accommodated according to prevailing planning policy
- The proper assessment of economic implications will need adequate resources, may need specialist teams and or independent consultants.
- EC 1 – an additional criterion should be added if the proposal is contrary to other planning policies to ensure that the development provides a long term benefit: *“The application should demonstrated how the proposal will be developed according to sustainable development principles”*
- In terms of the information to accompany applications key economic factors such as the number of direct and indirect jobs to be created and inward invest opportunities will be critical.
- The last sentence of Policy EC 1 should be omitted.
- All applications should be required to submit an independent expert design review
- Before a PPS on economic considerations is produced a section on Justification and Amplification should be developed and consulted upon
- PPS should make clear that all economic development should be sustainable and not damage the natural and built environment
- Terminology requires clarification (eg significant; substantial; economic implications, proportionate, sufficient)

### Main Issues:

- Economic considerations are not the only PfG priority
- Terms are not adequately defined
- Attributing determinative weight will skew decision making away from equally important priorities such as sustainable development and protection of the environment.
- PPS24 is unnecessary and will increase likelihood of legal challenge
- A policy which raises one material consideration above all others is in conflict with the guiding principles of PPS 1 (para 59)
- Undermines the development plan process, development plans, RDS, and the plan-led system
- Short term gains may be promoted without full consideration of the long term costs to the environment and existing businesses and jobs
- Does not specify the time span to be covered in supplying supporting documentation.
- Alters the balanced consideration of economic social and environmental factors which is the key to sustainable development, as set out in the Sustainable Development Strategy

- Not compatible with the principle of sustainable development
- Lacking in guidance and explanation as why policy is required
- No statement on how policy direction is consistent with protecting and enhancing our environment and natural resources.
- Assume that economic implications can be separated from social and environmental aspects
- Important that proposals involving a departure from planning policy engage in extensive public consultation
- Applications under EC 1 should be decided by the Department
- Seek assurance that policy will not undermine requirements by the developer and planners to undertake fully public consultation and public inquiries
- Not clear how policy would work in practice / limited in guidance
- No equivalent policy in England, Scotland, Wales or Republic of Ireland
- Concern that design may suffer
- Development may not be in the longer term public interest and unsustainable
- Could impact on a number of pending decisions with the Dept and PAC
- Limited guidance on the information to accompany applications
- EC 1 (second paragraph) appears to contradict case law advice given in the DOE NI DC Manual Version 3 (jan 2008) Section 5.3, 42 'Relevant Case Law'.
- Essential that there is due diligence similar to PPS 23 guidance to ensure that the figures are realistic and provide real economic benefit.
- Requires SEA screening

## **Category F: Local Government / Political Parties (12)**

### **Key Recommendations:**

- Mechanism must be developed to prioritise applications with European funding attached.
- More guidance required on how weighting of applications is applied / consideration should be given to short/medium/long term implications with weighting strengthened towards long terms sustainable development.
- Option 1 – Economic implications should only tip the scales in favour of proposed development when it is shown that there will be not demonstrable harm to environmental and social interests
- Option 2 – Preferred – Amend PPS 1
- Need to distinguish between major and minor applications
- The Last sentence of EC 1 should be omitted
- Requires clarification on the nature of information to support applications and assessment method.
- Might be possible to enforce a 12-month limit for issuing planning determinations assuming all information has been provided in a timely fashion
- Terminology needs clarification
- Clarification is needed to explain how proposals with employment/investment opportunities will be processed quickly
- Maybe requires a best practice guidance akin to PPS 23 based upon the experience of neighbouring planning administrations
- Needs to specify how the respective economic social and environmental factors will be calculated and weighted.
- Some weight should be attached to draft PPS 24
- Further clarification and guidance required on the need for 'sufficient information' but should not be a set of stringent criteria but a balance between further detail and ensuring that the policy remains open and wide ranging in scope.

### **Main Issues:**

- Strongly opposed to the introduction of PPS 24 / fully support PPS 24
- Devised solely to enable development that would normally be unacceptable in planning, social and environmental terms
- Will fundamentally undermine existing planning policies aimed at ensuring orderly social and spatial development and environmental protection
- EC 1 is short sighted
- Poses a real threat to the longer term economic recovery of NI by eroding our social, cultural, built and natural heritage assets.
- Facility already exists to take decisions based on economic considerations

- PPS 24 is unnecessary
- Will be used to strengthen the argument to retain damaging unauthorised developments where enforcement would otherwise have been appropriate and will introduce further inconsistency and lack of accountability into the decision making process.
- The Regional Manifesto for NI: "Ulster Towns Speak with One Voice" will be immediately undermined by PPS 24.
- Could place a planning authority in conflict with the Sustainable Development Duty within NI (Miscellaneous Provision) Act 2006.
- No definition of terms
- Does not expand on steps to be taken for applications to be processed flexibly and quickly.
- May prejudice the existing plans and strategies
- Diminishes Council functions in framing its own strategies and policies as they will be overridden by stipulations of the document with no recourse to appeal other than legal challenge.
- Does not distinguish proposals within settlements and countryside
- Is detached from the RDS which specifies a hierarchy for types of development linked to settlement size and transport links
- Does not differentiate between regional and local economy
- Concern with lack of resource and expertise to assess economic implications
- Must not be interpreted as a bypass of European legislation requiring protection of habitats and species
- Much will depend on the quality accuracy and transparency of the economic and financial information provided with applications
- Concern that policy might be giving more weight to faster, but not better determinations
- Considerable scope for misinterpretation of policy
- How does Dept envisage the draft policy being applied in those areas not covered by an up-to-date Area Plan?
- Concerned that it has been prepared at a time when objections to contentious planning applications are due to be heard at a number of inquiries, including the controversial proposals at Sprucefield. Its timing and purpose are a significant concern for BCC
- PPS 24 is not a substantial document
- It could make the policy recommendations of all dev plans, strategies and dev frameworks redundant which will contravene the need for the plan-led approach in the assessment of planning apps.
- Adoption of PPS 24 in its current format could overshadow the consultative input of the Councils elected reps and the general public in formulating policy. It could also be used to disregard genuine issues raised by European based environmental impact legislation

- No comparable policy exists in other jurisdictions.

## Category G: Individuals (52)

### Key Recommendations:

- This undemocratic draft should be dropped.
- Policy must include wording to allow for flexibility to include other considerations to be considered with the same weight / cross references to other material considerations.
- PPS 24 should not be introduced in advance of key counter-balancing policies i.e. PPS 2

### Main Issues:

- object in principle to this wording.
- It is not needed
- It is quite wrong to allow economic considerations to override environmental and social considerations.
- If the planning policy comes into force as currently worded, it will enable development to take place at the expense of the quality of life and health of ordinary individuals.
- It will make it prohibitively expensive for ordinary individuals, and residents' and community groups to oppose applications as they will have to provide an analysis of the purported economic benefits of a planning application as well as its environmental impacts.
- This is nothing more than a developer's charter.
- This is a deliberate attempt to ride roughshod over the environmental and health rights of residents affected by any potential expansion of Belfast City Airport.
- Smacks of short termism / devoid of any vision for securing the long term economic future of NI
- Will weaken the viability of towns and villages
- Make it easier to cause irreparable damage to our built and natural assets
- There is already scope for economic considerations to be taken into account
- Will make it easier to push through and defend bad decision eg Knock golf course
- Will be used to justify unauthorised commercial and industrial development
- Will be expensive to obtain analysis of economic benefits as well as impact on environment
- Seeks to subjugate the rights of individuals and the environment for the sake of profit.
- Will result in the loss of confidence in the planning system
- Developers will wildly exaggerate economic benefits
- Concern with resources to require rigorous examination of claims of developers
- Detrimental to the delivery of sustainable development / contrary to Sustainable Development Duty.
- May be unworkable

## Category H: 'Other' (4)

### Key Recommendations:

- Recommends insertion of **highly**:- *'where the economic implications of a proposal are **highly** significant, substantial weight shall...'* to ensure value of built heritage is not compromised for minor economic considerations.
- Definitions are required for '**Substantial**' and '**Determinative weight**' and '**significant**' economic implications.

### Main Issues

- Does not support Policy EC1 in its current form.
- Not written in accordance with Plain English Campaign Would stress that Theatres and Performing Arts venues greatly contribute towards economic growth – hope that policy is expanded to reflect this.
- Believes there is no need for a specific PPS 24 and that the implications have not been fully explored.
- Needs to outline how PPS 24 conforms to the Planning Bill (which identifies further sustainable development and improving/promoting social wellbeing as aims of Planning).
- Important to clarify how PPS is aligned to other Planning Policies.
- Social and Environmental Considerations should be given appropriate attention as they can contribute to economic prosperity.
- Research studies have shown that good planning and urban design brings significant economic benefit, both short term and long term.
- PPS24 has the potential to result in Development Plan designations being set aside for promised economic benefits that often don't materialise.
- Economic Considerations are already material considerations (already covered in PPS 1 paragraphs 10, 11 and PPS 4).
- Economic benefits may be short term or long term.
- If developer is convinced that profit levels are sufficient to justify investments – The investment will occur!!
- Need to avoid short term developer optimism.
- Important that planning system adapts flexibly/ quickly to challenges facing local economy.