

Response to Planning Bill

Belfast Healthy Cities welcomes the opportunity to comment at this stage of the Planning Bill having previously provided detailed responses and evidence submissions.

About Belfast Healthy Cities

Belfast Healthy Cities is a designated Healthy City and a leading member of the World Health Organization (WHO) European Healthy Cities Network of which there are nearly 100 cities. Belfast has a strong track record of meeting WHO goals and objectives and currently provides the secretariat to the network. Belfast Healthy Cities is a citywide partnership working to improve health equity and wellbeing for people living and working to improve health equity and wellbeing for people living and working in Belfast and responsible to WHO for the implementation of requirements for designated WHO European Healthy Cities. Our focus is on improving social living conditions and prosperity in a healthy way, through intersectoral collaboration and a health in all policies approach. Key partners include Belfast City Council; Belfast Health and Social Care Trust; Bryson Group; Department of Health, Social Services and Public Safety; East Belfast Partnership; Northern Ireland Housing Executive; Planning Service; Public Health Agency; Queens University of Belfast and University of Ulster.

Regeneration & Healthy Urban Environments

Regeneration & Healthy Urban Environments is a core area of our work and focuses on highlighting how the physical environment impacts on people's lives, health and wellbeing and indeed health equity. Our work has focused on collating evidence and building capacity among planners and other built environment professionals as well as health professionals, on how the built environment affects health and wellbeing. Belfast Healthy Cities lead the Regeneration and Healthy Urban Environments Group which is a subgroup of the Belfast Strategic Partnership.

Comments on the Bill

Belfast Healthy Cities recognises the importance of the Bill and reinforces some of the key messages as outlined in previous more detailed responses. We wish to highlight how planning impacts on health and well-being and how it affects health and social inequalities.

Clause 2 General function of the Department and the planning appeals commission

In light of the Healthy Cities concept and Belfast Healthy Cities work in Health Urban Environments we support '*promoting or improving well-being*' however we would suggest that the concept of '*promoting or improving well-being*' requires further clarification. For example what is the definition of 'well-being' in terms of the bill and what are the guidelines/criteria for this?

Belfast Healthy Cities would reinforce the message that healthy urban planning is 'planning for people' – planning that considers peoples needs and

focuses on the positive impact planning can have on their health. Healthy urban planning has an explicit aim to prioritise health within planning. Offer more information on the impact of planning and regeneration is contained in a publication by Belfast Health Cities '*Healthy Places – Strong Foundations*' (2010) which can be accessed at <http://www.belfasthealthycities.com/PDFs/HealthyPlaces.pdf>

Belfast Healthy Cities also highlights the approach by the Scottish Government as detailed in the implementation plan '*Good Places, Better Health*¹, which can be accessed at.

<http://www.scotland.gov.uk/Resource/Doc/254447/0075343.pdf>.'

'*Good Places, Better Health*' recognises that the environment that surrounds us is key to our health and ensures greater connection between environment and health policy and actions.

Belfast Healthy Cities supports the objectives '*furthering sustainable development*' and '*promoting economic development*'. Again, we would ask for clarification of the definition of '*sustainable development*' and '*economic development*'. A full and clear definition of '*sustainable development*' may cancel out the need for an objective on '*economic development*.'

Sustainable development encompasses environmental and economic sustenance and socio-demographic and health dimensions. It means development that meets the needs of the present without compromising the ability of future generations to meet their own needs. In terms of sustainable development Belfast Healthy Cities would as before stress the important of *sustainability appraisal*.

In terms of promoting economic development, it is important to highlight that this should be more than job creation. Belfast Healthy Cities highlights that vibrant places support the economy. Vibrant, active places help sustain existing and generate new local business opportunities, as they increase footfall and people willingness to spend time and money within the local area. As an example, experiments with pedestrianising town centres in England have indicated increased use and associated economic benefits. Even small businesses can help sustain or regenerate a local high street, through generating footfall to other businesses. Squares can support informal economic activity.² There is also increasing evidence that house buyers are willing to pay a premium for a positive sense of place and living in a walkable environment with easy access to key services.³

¹ Scottish Government (2008) *Good Places, Better Health, A new approach to environment and health in Scotland, Implementation plan*, <http://www.scotland.gov.uk/Resource/Doc/254447/0075343.pdf>

² N Dines & V Cattell (2006) *Public spaces and social relations in east London*. York: Joseph Rowntree Foundation. Available at <http://www.jrf.org.uk/publications/public-spaces-and-socialrelations-east-london>.

³ Litman, T (2010). *Where we want to be: home location preferences and their implications for smart growth*. Victoria Transport Institute, Victoria (CAN) 2007. <http://www.vtpi.org/sgcp.pdf>

Clause 5 (Pre-application community consultation)

Belfast Healthy Cities supports community involvement in the planning process. Community planning involves bringing people together, which may lead to increased social cohesion in an area. It can also help generate confidence and willingness to take action for developing the area.

Clause 6 (Determination of planning applications)

Belfast Healthy Cities would like to stress the importance that economic advantage should not take precedent over health and wellbeing.

A key principle of planning is that it considers issues related to the use and development of land. In introducing the assessment of economic advantages and disadvantages, the planning system could be used for a purpose for which it was not legally designed. Clause 6 seeks to expand the issues that planners need to take into account and as a consequence, the NI planning system will no longer be able to rely on the stability of 40 years of case law that have determined the boundaries of planning considerations – this will have to be redefined, through a series of legal challenges, to establish case law. This will inevitably introduce a great deal of instability and delay into the planning system in NI, potentially making it unworkable.

The inclusion of consideration relating to economic advantages and disadvantages create significant scope for litigation and escalating challenges between competing developers. It gives objectors considerable weight, where any person who thinks they may be personally economically disadvantaged as a result of a planning decision (for example, one developer losing out to another) may make a valid objection to an application. As a result, this clause could seriously slow down the planning system.

If this clause is to remain the economic advantage or disadvantage needs to be considered within the impact of health and wellbeing of the local population. Belfast Healthy Cities recommends a Health Equity Impact Assessment could be carried out to ensure economic advantage does not have an impact on the local population's health for example, increased air pollution as a result of increase in private car usage resulting in a negative health impact through respiratory and asthmatic conditions.

Clauses 9, 17 and 19

Belfast Healthy Cities welcomes Clause 9 aftercare conditions for ecological purposes on grant of mineral planning permission, Clause 17 conservation areas and Clause 18 tree preservation orders: dying trees - as these clauses promote biodiversity in Northern Ireland and enhancement of conservation and green space areas. We recognise the value of biodiversity and conservation areas in terms of green and open space. These can contribute

to addressing inequalities and promote positive health and wellbeing through the following points⁴:

- Access to green space encourages an active lifestyle
- Contact with nature underpins mental wellbeing
- Low cost access to positive environment supports health equity
- Social cohesion can be built within green spaces
- Strengthening green space contributes to economic prosperity
- Urban green space is vital for environmental sustainability

⁴ Belfast Healthy Cities (2010) Healthy Places – Strong Foundations. Celebrating World Health Day 2010 – Urbanisation and Health, <http://www.belfasthealthycities.com/PDFs/HealthyPlaces.pdf>