

14. 03. 2014

Dear Department of the Environment for Northern Ireland.

I would like to make a submission/response to the planned changes to the Northern Ireland Planning bill that is making its legislative progress through Stormont presently.

**I would like to make the following response to the consultation re the above Bill. In my view the Bill would not benefit the people, economy or environment of Northern Ireland and should not become law. My principal reasons for opposing the Bill are:**

- 1. It is not necessary as economic development is already one of the important factors taken into account when assessing planning proposals.**
- 2. The economic value of a proposed development would be impossible to assess accurately, especially by planners who are not trained as economists.**
- 3. The planning system would be overburdened and slowed with appeals by developers, making it effectively unworkable.**
- 4. There is a contradiction between the primacy of economic factors and the responsibility to encourage and protect sustainable development. The favouring of the former over the latter would have disastrous consequences for Northern Ireland's vulnerable natural environment and the health and prosperity of our people.**
- 5. There would be no way of monitoring compliance with the economic conditions of planning approval.**
- 6. No effective sanctions would be enforced against developers who reneged on their promises of economic benefit.**
- 7. It is inappropriate to introduce such devastating change to the planning system in this manner and a full public consultation should be carried out.**

**In place of the economic development test, which accords equal status to beneficial and to destructive, dangerous and inequitable development, I would urge the committee to support a policy of sustainable development as defined by the World Commission on Environment and Development 1987; "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". Such a policy would include the principles of resource conservation, environmental and inter-generational justice, the precautionary principle, the polluter pays principle and meaningful public consultation.**

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