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Consultation response to the 2013 Planning Bill.

from

Greenisland Heritage & Environment Group

The Greenisland Heritage & Environment Group (GHEG) was formed in 1996, originally to resist closures of local footpaths. It soon became involved in the Belfast Whitelands Public Inquiry of 1997, later in the 1998 Inquiry into the Draft Carrickfergus Area Plan and more recently in the BMAP Public Inquiries. It continues to monitor planning issues and planning policies as they affect Greenisland.

Clause 2. Para 2 (1) (a) (1) (c)

'Promoting economic development' should not be a primary function of the Planning System. The planning system exists to bring forward orderly development in the public interest; this is a wider role than merely concentrating on economic benefit.

The planning system's role is to deliver sustainable development which must consider the environmental and social impacts of development in addition to economic benefits. In 1981 the "presumption in favour of development" was introduced to the Province, placing an onus on the Planning Service to grant permission for development, lest refusals vitiate other government policies designed to create employment.

This policy was disastrous in terms of the quality of urban design produced through the 1980s and 1990s and resulted in the creation of poorly designed, car dependent, amenity and facility-starved suburbs in most towns. The Planning Service was forced by the late 1990s to recognise the damage it had done and introduce the Quality Initiative, Creating Places and Planning Policy Statement 7 to offset the damage. Unfortunately these policy initiatives have only been partially successful.

Should this focus on economic development be reintroduced, it is very likely our countryside and towns will be further blighted by ugly and inappropriate developments of poor design quality. Northern Ireland's natural and built heritage has often been badly served by the existing planning system which in itself must have had a negative effect on economic development, and this situation should not be exacerbated.

The Planning system should concentrate on land use decisions, promoting good design and allocating appropriate locations for *sustainable* development, not short term 'economic development promises' which can burn themselves out quickly and often leave indelible scars on landscape and townscape for generations to come.

Several examples can be seen in our own Carrickfergus Borough, where bad choices of locations for short-term 'economic developments' have reduced the historic town's potential for development as a visitor and tourist destination.

Clause 6. Para (1) (1A) and (2) (1A)

These are allied to Clause 2 provisions and would be almost unworkable. How could Planners adjudicate on the economic balance between the advantages and disadvantages of a particular application? Notoriously no two economists agree on such matters. Asking a Planner to do this would give an unfair advantage to a rich or powerful applicant with the resources to employ expensive lawyers and consultants to make his or her case.

More seriously there would be no way of holding the applicants to their promises after extravagant claims had swung otherwise dubious approval decisions in their favour. Again Carrickfergus Borough can show examples of housing developments with unfinished infrastructure, delivery of which was promised as part of the application (and believed at the time).

Clause 20. Para. 76C (5)

Planning Service's enforcement (or rather the lack of it) of planning conditions and its ignoring of blatant flouting of approved plans has been a source of dismay in several instances in the Borough. While the proposal for fixed penalties in the Bill are welcome, they should form part of a range of escalating enforcement options available to Planning Enforcement.

We therefore object to this clause as it stands, which would seem to prevent further fixed penalties or sanctions being applied for breaches in a particular activity once one fixed penalty has been paid.

GHEG, 14th March 2013.