

Room 247
Parliament Buildings
Stormont Estate
BELFAST
BT4 3XX

11th March 2013

Dear Sir or Madam,

Re: The Housing Executive's response to the Planning Bill (January 2013)

The Housing Executive welcomes the opportunity to respond to the Planning Bill introduced to the Northern Ireland Assembly on 14th January 2013.

Our comments are as follows:

12. The Housing Executive would like to see supplementary guidance published to give direction on how some of these reforms can be implemented. We would like to see a definition of well-being with measurable criteria. Guidance will also be need on pre application community consultation. Details are needed on what is considered adequate consultation, for example, newspaper adverts, letters, meetings and what should be contained in an applicant's consultation report.
13. The Housing Executive believes that the clause for planning authorities promote economic development is inappropriate in legislation. We believe that the presence of this clause in legislation is too prescriptive and could lead to complex legal challenges. The Housing Executive would like to see considerations on the environment and society given equal weight with economic considerations and these should be contained in the planning policy.
14. The Housing Executive considers the word 'promote' in relation to economic development is not suitable. Planning functions, through approving applications and zoning land for industry, can facilitate economic development but we are unsure how planners can further promote economic development. The Housing Executive believes that the promotion of economic development would be better seated in a community planning framework which can support and integrate economic development programmes and regeneration, tailored to local circumstances and with community involvement.

15. If this clause remains within legislation there will need to be detailed guidance on how the promotion of economic development will be assessed. There will be a skills gap for planners in assessing applications from an economic perspective. The future economic impacts of development proposals will be difficult to measure. While a proposal may have a positive impact in one area, it could lead to the future decline of another. Applicants may also need to provide economic statements, with planning applications, which will need to be independently verified. This could lead to delays in the planning system.
16. Economic factors will also need to be assessed against sustainable development.

Yours sincerely



John McPeake
Chief Executive