

Dear Sir / Madam,

It would seem the Dept of the Environment is in the process of creating jobs - for legal profession in profusion with this bill.

The Planning system seems already highly in efficient and this by adding in the clauses on Economic Considerations is going to make the system completely unworkable. Every developer is going to claim economic advantage, and every objector will claim economic disadvantage and the system will be mired in perpetuity. That will be the effect of these changes,

How will jobs created for example be enforceable ? Revenue created ? Wealth created ? These are all intangibles which are unenforceable.

If I build a house and put in Bay windows instead of ordinary ones as per the plan, I would expect to have to rectify and refit.

If I build a retail unit promising 100 jobs but instead only provide 50, I've also broken planning regulations, but I don't believe I'd be told shut the retail unit down.

Its debatable whether the duty of Economic promotion could be in direct opposition to EIA assessments as the process of an EIA may reduce a claimed economic advantage

The Fixed Penalty system while not a bad idea in itself appears to offer immunity once accepted.. This will be like the Dangerous Driver opting for the careless driver charge.. I believe go ahead with Fixed Penalty but don't give immunity.

We must always ensure that Polluters pay.

I'm unsure whether this bill addresses how planning legislation is enforced, and I believe that to be a major problem in Northern Ireland.

Rather than Economic advantage and considerations, the system should look towards sustainability and clauses re written to emphasise that.. the bill as it stands will make lawyers and journalists happy as cases shunt and weave through the courts but will ultimately damage Northern Ireland's reputation as a place to do business.