

16th February 2015

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Dr K. Phelan
Northern Ireland Assembly
Committee for Social Development
Room 144
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Dear Kevin,

**Submission by JUNO Planning & Environmental Ltd to Consultation on
'Regeneration Bill'**

Outlined below are JUNO Planning & Environmental Ltd's comments on the draft Regeneration Bill legislation. Our response is structured with regard to specific clauses of the Bill.

Part 1: Powers in Relation to Social Need

Clause 1: Financial assistance to address social need

JUNO notes the potential role for both Councils and the Department in addressing social need at a local and regional level respectively. We recommend that streamlined processes are put in place to prevent duplication of roles and minimise unnecessary bureaucracy.

Clause 3: Power to carry out works for the improvement of the environment

JUNO suggests that proposed works for the improvement of the environment must have regard to Council's Local Development Plan and Community Plans.

Clause 4: Power of Department to provide financial assistance

JUNO notes that Part 1 Clause 4 of the Regeneration Bill amends Article 3 of the Social Need (Northern Ireland) order 1986 by removing reference to districts in defining the focus of the Department's financial assistance. JUNO recommends that DSD has regard to the (i) Community Plan and (ii) Local Development Plan prepared by the respective local councils in their provision of financial assistance.

Part 2: Development Powers & Other Powers for Planning Purpose

Clause 5: Development schemes of councils

JUNO wishes to highlight the importance of both the Department and local Councils having regard to the council's current (i) Community Plans and (ii) Local Development Plans in the preparation of 'Development Schemes.' Part 2 Clause 5 of the Bill does not require both parties to have regard to councils 'Local Development Plans' and therefore the potential exists for the 'plan-led system' that is at the heart of the Reform of Planning to be by-passed.

If the Department directs Council to prepare 'Development Schemes,' legislation should state which party will pay for the development scheme. If DSD is directing the Council to prepare a development scheme we suggest that DSD is responsible for financing it.

Clause 6: Adoption of Development Schemes by Councils

JUNO notes that the statutory process outlined for preparation of Development Schemes by Council could be considered onerous and bureaucratic as it will require input from three statutory bodies namely (i) Council (ii) Department (DSD) and the (iii) PAC. This will have implications for the staffing arrangements of the statutory bodies highlighted and it will be essential that all bodies are adequately staffed or there may be potential for delays in the delivery of 'Development Schemes' and subsequent regeneration proposals.

Clause 7: Acquisition of land by councils for planning purposes

Sub-section (4) states that the vesting of land cannot be made until development schemes have been adopted. We have concerns regarding the potential length of time it could take to prepare development schemes and then vest land. It is imperative that efficient and streamlined processes are put in place so that lengthy delays are not allowed to occur.

Clause 9: Development of land held by councils for planning purposes

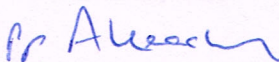
We request the opportunity to review and comment on the referenced regulations.

Clause 13: Development schemes made by the Department

JUNO wishes to highlight the importance of the Department and local Councils having regard to the council's (i) Community Plans and (ii) Area Plans in their preparation of 'Development Schemes.' Currently the Bill does not make provision for this important issue. Consequently, the Department would have the ability to by-pass the 'plan-led system' that is at the heart of the Reform of Planning.

We would welcome the opportunity to present this information to you in person, or discuss any areas of interest in more depth if required.

Yours sincerely



Helen Harrison
Director