

PED 8 SPG – Public Consultation
Planning Policy Division (DOE)
3rd Floor Millennium House
17 – 25 Great Victoria Street
Belfast
BT2 7BN

Date: 20 April 2012
Our Ref: CW/PED8

Dear Sirs

**RE: SUPPLEMENTARY PLANNING GUIDANCE (SPG) TO ACCOMPANY POLICY PED 8:
'DEVELOPMENT INCOMPATIBLE WITH ECONOMIC DEVELOPMENT USES' OF PLANNING
POLICY STATEMENT 4: 'PLANNING AND ECONOMIC DEVELOPMENT'**

Thank you for the opportunity for The Royal Town Planning Institute to respond to the consultation on the above. The Institute seeks to advance the science and art of spatial planning for the benefit of the public.

The Institute is the largest professional body representing spatial planning and represents over 23,000 professional planners in the public and private sectors. The Institute has over 500 members in Northern Ireland, within the membership there is a considerable body experience relating to planning and economic development, subsequently RTPI NI is well placed to make a sound and valued response to this policy.

The Institute is strongly committed to the economic development of Northern Ireland and recognises the need for uses to be compatible in order to protect those enterprises already established.

Having discussed the paper with members of the RTPI NI Branch Executive Committee concerns arose that as a guidance note the document was uncertain and elusive.

Members expressed concern that the 'suggestion' in 1.2 that it 'could' be 'useful' for the local planning office and Invest NI to compile and maintain a list of sensitive industrial enterprises was too vague for this stage in the process of guidance production. This suggestion would imply that much work is still required to establish this proposal as a viable course of action.

The ambiguity of the document continues in the penultimate paragraph of 1.10. It is unclear if NIEA will have the comparative information required to advise on potential environmental impact, and if they do, it **may not** in fact address the specific impact but will help to decide if specialist advice is required. This appears to be a protracted and potentially misdirected process.

Members seek clarification that IPI, LRM, MHRA & FSA have agreed to be consulted on these matters and they will provide the information requested within an agreed timescale.

Members expressed the view that the document could be set out in a more user friendly layout, suggestions include having the three policy tests as individual headings with the policy criteria bulleted below.

Attention was drawn to paragraph 1.12 which seems to introduce a fourth test.

While the Institute is in support of the principle of the draft guidance it was felt that the document lacked clarity and in its present form was slightly vulnerable to potential legal challenges. Ambiguity of some parts of the document could result in unnecessary and prolonged delays in the application process and further clarity is required on how the consultation process would work.

I hope you find this report useful. If you require any clarification, or feel you need further comment, please contact me at the above address.

Yours sincerely

CLAIRE WILLIAMSON
Northern Ireland Policy Officer