

Introduction

Freedom of Information Act 2000: Confidentiality of Responses

Background

Why undertake a Call for Evidence?

Purpose and Scope

The Purpose of Planning

1 Can you provide any evidence on how and why the Department should update, revise, and improve 'The Purpose of Planning' as contained within the SPPS so that it is fit for purpose and suitably future proofed to appropriately support the Climate Change agenda going forward? Please detail.

Answer1:

'The Purpose of Planning' statement contained within the SPPS highlights the role of planning in sustainable development, particularly in economic terms. Whilst equitable and just economic development is an important outcome of good planning, much more can be said on the purpose of planning, particularly supporting the Climate Change agenda.

Planning plays an essential role in the climate action and sustainability conversation, with its ability to integrate energy, transport and land use planning, encourage sustainable travel, develop the best local solutions to low carbon energy, deliver well located and energy efficient housing, guide investment in integrated blue and green infrastructure and coordinate strategic resilience to the impacts of climate change.

Planning policy provides a strong mechanism and guide to managing development, with a place-based approach, ensuring that the local context is considered and opportunities are utilised to ensure maximum benefits for climate mitigation. Research published by the RTPi in March 2021 on 'Place-Based Approaches to Climate Change' showed that a place-based approach is essential to climate action, adaptation and mitigation policies, in order to avoid sectoral thinking and acting in silos, which can have a disproportionately negative impact on some communities. The full report can be found here: <https://www.rtpi.org.uk/research/2021/march/place-based-approaches-to-climate-change/>

A well-resourced, plan-led, positive and transparent planning service, which is proactive in engaging local communities, can bring together objectives across services and help achieve inclusive development and climate action goals. The planning system and planners have an important proactive role as a driver of change. A strong and engaged plan-led system is essential if developers and communities alike are to have confidence that development will be successful and sustainable. Therefore local planning services need to be suitably resourced and planners need to receive the appropriate training and support they require to make holistic place-based decisions that are equitable and climate conscious.

Furthering Sustainable Development

2 Can you provide any evidence on how and why the Department should update, revise, and improve 'Furthering Sustainable Development' (including Mitigating and Adapting to Climate Change and The Importance of Ecosystem Services) in order to better support the Climate Change agenda? Please detail.

Answer2:

Whilst the existing policy on 'Furthering Sustainable Development' does go some way to support the Climate Change agenda, much more could be done to strengthen and update the approach. For instance, the evidence currently included on climate change is sparse, including its impacts on communities and livelihoods. In a land use sense, this is most notably demonstrated by flood risk.

The present policy talks about the 'three pillars' of sustainable development as being social, economic and environment. RTPi NI would encourage the government to pursue a place-based and ecosystems-based approach, rather than a sectoral one, where policies relating to climate action and adaptation are integrated into land use policies and development decisions, as well as investment decisions, and behaviour change of all individuals in society towards sustainable choices is encouraged through the creation of environments that encourage low carbon lifestyles. For instance, this means ensuring that new housing schemes are connected to the public transport network to enable residents to access employment opportunities by sustainable transport; locating retail and other local amenities within walking or cycling distance to reduce dependence on car trips; and ensuring that the buildings themselves are energy efficient to reduce the carbon impact whilst also reducing energy costs for the residents. Research published by the RTPi in 2021 provides the evidence base for a 'Place-Based Approach to Climate Change'. The full report can be found here: <https://www.rtpi.org.uk/research/2021/march/place-based-approaches-to-climate-change/>

This can bring positive and lasting change, be more reliable longer term, and provide multiple co-benefits to society such as improved health and wellbeing, more secure supply chains, creation of sustainable green jobs, and a reduction in NI's reliance on fossil fuels.

A 'whole systems' approach promotes an understanding of the interactions between different parts of the system, and how these can combine to affect the desired outcome. A place-based systems approach would align local plans with the national sustainability agenda, create mechanisms which enable planning across boundaries, level up by addressing regional disparities in productivity and access to social infrastructure, provide technical and financial support to planners in local authorities to address internal barriers to delivery, and harness the power of data sharing to promote access to information about the planning process such as platforms for digital collaboration and engagement.

Among other things, a place-based systems approach creates a system which complements and contextualises input from subject experts tackling an issue such as climate change or biodiversity loss. For example, planners work with sustainability and climate officers as well as transport planners and highway teams, in-house energy experts and ecologists, tree officers, flood officers, and housing officers among others. Planning and sustainability colleagues need to work together in local authorities to develop strategies and action plans which prioritise a place-based approach where people thrive within social and planetary boundaries.

The RTPI research suggests that while there are significant opportunities for joint working between planning officers and climate and sustainability colleagues, there is also a skills and knowledge gap within the planning profession that needs to be addressed so planners can play a leading role in the place-based response to the climate and ecological emergency from within local authorities. Shared outcomes, integrated climate and planning policies, skills and training, and area-based commitments (such as the Belfast net zero carbon roadmap) could support a more effective model for reducing emissions and building climate resilience.

More emphasis needs to be placed on the nature crisis and the biodiversity crisis in Northern Ireland which is much more critical now than when the SPPS was written. A coalition of conservation and research organisations recently described Northern Ireland as "one of the most nature-depleted countries on earth" (State of Nature Partnership, State of nature: Northern Ireland, 2023). The same report identifies various "pressures" on biodiversity in Northern Ireland, but gives greatest prominence to habitat loss due to development, urbanisation and intensification of agriculture.

RTPI NI published a research report in December 2023 on 'Biodiversity in Planning in Post-Brexit Northern Ireland'. The full report can be found here: <https://www.rtpi.org.uk/media/16313/biodiversity-in-planning.pdf>. It includes recommendations about how better to raise biodiversity considerations through the planning system, including the recommendation that all tiers of government should work to ensure the climate and biodiversity crises are given comparable prominence, including through the drafting of biodiversity legislation where appropriate.

Core Planning Principles

3 Can you provide any evidence on how and why the Department should update, revise, and improve the 'Core Planning Principles' in order to better support the Climate Change agenda? Please detail.

Answer3:

The current 'Core Planning Principles' of: improving health and wellbeing; supporting sustainable economic growth; supporting good design and positive place-making; and preserving and improving the built and natural environment; do all go some way to reflecting the climate change agenda but they could be condensed and clarified.

For instance, the RTPI published a report in June 2020 entitled 'Plan the World We Need', in response to the Covid-19 pandemic and the challenges it presented. The full report can be found here: https://www.rtpi.org.uk/media/5688/plantheworldweneed_june2020.pdf. Many of the findings and recommendations in that report also apply to planning's response to the climate emergency, as they came from the Committee on Climate Change, IPPR Environmental Justice Commission, and National Infrastructure Commission amongst others.

That report focused on three aspects in planning, namely: sustainability, resilience and inclusivity, with recommendations for planning under each one:

Sustainability - Accelerating progress towards zero carbon by retrofitting existing buildings and advancing standards for new development; decarbonising heat through the deployment of district heat networks and heat pumps; decarbonising transport through a shift to active, public and shared transport modes and rollout of electric vehicle charging infrastructure; investing in smart energy grids and low-cost solar energy; and supporting skills, training and job growth in the above while avoiding investments and bailouts which are incompatible with a net-zero carbon economy, or which increase exposure to risks.

Resilience: Future-proofing buildings and infrastructure to the risks of flooding, overheating, drought and fire; increasing tree planting, permeable surfacing and multifunctional urban green spaces; providing a choice of affordable and safe transport options; and moving towards a circular economy that operates within ecological limits and places greater value on health, wellbeing and resilience.

Inclusivity: Creating healthy and equitable places by targeting support to the most vulnerable in society; addressing regional inequalities; and improving capacities and processes for democratic community participation in decisions about the future.

RTPI NI also published its own 'Plan the World We Need', which focused on the role of planning in a sustainable, resilient and inclusive recovery for Northern Ireland. This response was centred on desired outcomes under three main themes: place, connections and governance. These can all be linked back to the UN's Sustainable Development Goals (SDGs). Outcome-focused planning is essential to ensure efficiency and sustainability and, in so doing, prove planning's worth. The full report can be viewed here: <https://www.rtpi.org.uk/media/5729/ni-plan-the-world-we-need-final.pdf>.

Subject Policies

4 Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Flood Risk', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

Answer4:

Several of the policies and evidence base referenced in 'Flood Risk' need to be updated.

DfI Rivers published the 'Northern Ireland Flood Risk Assessment 2018', which includes flood hazard maps, in accordance with the EU Floods Directive. This assessment takes place every six years. The third 'CCRA for NI' estimated that 20 km of railway lines and three railway stations in NI are at 1:75 chance or greater risk of coastal flooding. The 'Flood Risk Management Plan 2021-27' was published by DfI in December 2021 and focuses on prevention, protection and preparedness in relation to managing aspects of flood risk. These are all policies which can be used to underpin and form an evidence base for the SPPS.

The SPPS refers to 'flood plains' but RTPI NI would recommend use of the term 'flood risk areas' instead, as 'flood risk areas' recognises the more complex nature of land use and flooding. RTPI NI would suggest that a full and on-going data analysis be undertaken to better understand what planning applications have been approved within flood risk areas, and the rationale for this. This should include analysing how many new homes/buildings are within flood risk areas, not just if part of the application site (e.g. open space) is within the actual flood plain.

One of the key actions in the 'NI Climate Change Adaptation Programme' (NICCAP2) published by DAERA in 2019 was to increase the number of Sustainable Urban Drainage Systems (SUDS) to help with flood alleviation. More can be made of this in the SPPS, especially as there will be an increased emphasis on SUDS in all new planning applications once LDPs are adopted. There is now a specific SPG (Supplementary Planning Guidance) on SUDS in Belfast, published in May 2023. These design measures separate the surface water from the sewage and therefore in theory increase capacity. They include the likes of swales, permeable paving, and water storage systems. In theory these measures should help increase capacity in existing systems, but there is no real clarity on how this is measured or calculated. There is also concern around the expertise to deal with and monitor SUDS as there is no regulatory body planned.

In terms of examples elsewhere, some examples of adaptation and flood resilience in Scotland were highlighted in Sniffer's Flood Resilience conference 2024 (see: <https://www.sniffer.org.uk/flood-resilience-conference-2024>). There were also two claims raised recently in the high court and one in the court of appeal, raising issues about the interpretation and application of the sequential test in national policy on flood risk. Details can be accessed via this link: <https://www.ftbchambers.co.uk/news/news-view/flood-risk-in-the-high-court>.

Subject Policies (continued)

5 Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Transportation', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

Answer5:

The SPPS should take account of the new approach for transport infrastructure planning and delivery of transport infrastructure services across Northern Ireland in order to better support the Climate Change agenda. For instance, references to the need for local policies 'to ensure adequate provision for car parking within new developments' are outdated and should be revised to acknowledge the need for modal shift, behaviour change and a hierarchy of trip choice to prioritise sustainable transport.

Research published by the RTPI in 2021 on 'Net Zero Transport' (<https://www.rtpi.org.uk/research/2020/june/net-zero-transport-the-role-of-spatial-planning-and-place-based-solutions/>) emphasized a place-based approach which prioritises measures to reduce the overall need to travel, followed by those which shift trips to active, public and shared transport, and finally those which switch vehicles to cleaner fuels. By following this hierarchy, decarbonisation acts as a catalyst for reducing car dependency and creating healthier, safer and more equitable communities. By contrast, the switch to cleaner fuels only accounts for just over half of the necessary emission reductions and does not tackle other negative impacts of car dependency such as poorer health outcomes, increased strain on public services, and economic resilience.

With this in mind, emphasis in the SPPS should be on the planning system prioritising development that enables growth whilst achieving a substantial reduction in travel demand. This should focus on maximising the potential for local living by ensuring that most people can access a wide range of services, facilities and public spaces by walking and cycling. Increased home working, digital service delivery, and new forms of flexible work and community spaces will play a key role, alongside investment in place.

The SPPS subject policy on Transportation should mention that residual travel demand should be shifted away from private vehicles to active, public and shared forms of transport, at a scale which significantly exceeds current UK best practice. Integrated transport networks should be accompanied by access and parking restrictions for most categories of private vehicle, creating liveable streets and ensuring that sustainable modes are the attractive option.

Achieving this requires a decisive break with the conventional approach of meeting predicted changes in travel demand with new road capacity. The scale of this challenge requires a truly integrated approach that unites transport and land use planning to deliver place-based visions which meet ambitious targets for trip reduction, modal shift and carbon reduction, alongside other economic, social and environmental objectives. Again, this comes back to the need for place-based approaches to climate change. Achieving these place-based visions requires a policy framework that puts the reduction of carbon at the heart of decision making, and enables the planning, funding and delivery of the necessary interventions to create genuinely sustainable communities.

Subject Policies (continued)

6 Can you provide any evidence on how and why the Department should update, revise, and improve the subject policy 'Development in the Countryside', as set out in the SPPS, in order to better support the Climate Change agenda? Please detail.

Answer6:

RTPI NI supports the policy approach in the SPPS which is to cluster, consolidate, and group new development with existing established buildings, and promote the re-use of previously used buildings, in order to use existing infrastructure and mitigate adverse impacts of development. However, the policy could be updated to better support the Climate Change agenda.

Research published by the RTPI in 2022 on 'Rural Planning in the 2020s' has a significant amount of information on climate change, climate action and mitigation, and the impact of both on rural communities. The full report and technical appendices can be found here: <https://www.rtpi.org.uk/policy-and-research/research/rural-planning-in-the-2020s>

Climate Change: Rural areas are susceptible to climate threats, for example via increased frequency and severity of riverine flooding; stronger and more regular extreme storms and associated damage to power lines, communications and transportation infrastructure; a greater potential for coastal erosion due to sea level rise; and impacts on farming, fisheries, forestry and aquaculture from rising temperatures, changing weather patterns, and ocean acidification.

Climate change is having a range of impacts on the 'natural environment', much of which is in its nature rural and non-metropolitan. Shifts in cultivation methods, in response to climate pressures, can impact negatively on soil quality and on the capacity of land to not only produce food but also sequester carbon and therefore mitigate climate change. The carbon sequestering function of rural land may be further reduced by development, which adds to the water quality issues that are now limiting development in many parts of the UK and Ireland.

The planning system should be used to effectively plan for, monitor and measure land use change to enable the best use of land to mitigate against climate change and create resilient rural communities. This could be done through strategic planning policies that can be developed and adopted region-wide.

Climate Action and Mitigation: Rural areas can play a huge role in addressing climate change. Introducing nature-based solutions in both rural and urban locations (such as ecosystem-based adaptation and mitigation measures and green and blue infrastructure) in addition to improving agricultural methods and environmental stewardship, have the potential to provide up to 30% of the greenhouse gas mitigation required until 2030 to keep global warming to less than 2 degrees.

However, rural areas may also be disproportionately affected by climate change policies, for instance there is not the same access to public transport that is available in urban areas, so there is more reliance on the private car to access vital amenities. Higher density mixed-use development supports the viability of public transport networks, which are difficult to justify on a cost-benefit ratio in rural areas. Therefore, outside of urban areas, increasing people's ability to live local, use active travel for short trips, and improve access to affordable, integrated public transport hubs or new forms of shared mobility can help achieve the same climate action goals whilst ensuring access to essential goods and services, thereby helping to build more resilient rural communities.

The farming economy is a significant source of carbon emissions. However, if new forms of farming are required, these could be costly for farmers to implement, and their impacts also need to be mitigated. The transition of the agriculture industry towards a more agroecological approach and encouraging biodiversity net gain of land use changes and development could be facilitated through planning policies that support diversification of farm businesses.

The challenges of retrofitting homes to help them mitigate, and adapt to, climate change, are significant across all of the UK and Ireland. Some rural-specific problems are: a legacy of poor design and insulation which is not being addressed through existing funding streams, and the need to acknowledge that newer technology such as ground-source and air-source heat pumps requires highly skilled local maintenance, which can be harder to access in rural than urban areas. Ensuring that new housing is fit for the future, both in terms of design and location, is a key function of planning.

An emphasis on renewable energy can also disproportionately affect rural communities. Solar energy schemes are seen by some as being responsible for reduced agricultural productivity in some cases. It is land hungry but financially attractive to those farmers not hindered by grid constraints. More generally, there has been a rising volume of applications for renewables, and significant pre-application discussions often contesting landscape and farmland impacts. Local authorities often lack the expertise needed to deal with planning for renewable energy developments applications.

'Just Transition': Research published by the RTPI in 2022 on 'Rural Planning in the 2020s', found that planning needs to balance a myriad of competing claims in rural space, from housing to habitat protection, flood management, biodiversity protection, and tree planting, as well as the effective management of landscape designations and the promotion of economic diversity. The report asserted that many rural areas need to urgently transition from where they are now – from locked-in carbon dependency and unsustainable patterns of development and energy use – to where they need to be very soon – places of economic diversity and adaptation. A framework is needed in which to make sense of competing needs and land uses, and the plan-led system which is in place in Northern Ireland is an opportunity to deliver a balanced approach to development that can set out a pathway for resilience in rural areas that reduces dependency on fossil fuels and supports innovation and economic resilience. However, local authorities require the skills, expertise and resources to deliver local development plans in a timely manner that can support this transition.

The idea of 'just transitions' seems to offer a way forward, as it argues that local people's livelihoods, and their future prospects and prosperity, cannot be overlooked. Ideas on how local populations share in the benefits of 'just transitions' emerged from a number of case studies in the research report. The 'Talking about our Place' toolkit (developed by NatureScot in 2012), for example, illustrates the central role of communities in identifying the values and benefits arising from key assets. The Toolkit was developed to empower rural communities in particular to represent their needs and preferences in planning. The toolkit has been followed by a wider move towards place-based approaches in Scotland in recent years, such as the 'Climate Ready Places' initiative (2016) and the 'Place Standard Tool' with a climate lens (2022), both of which were developed by Adaptation Scotland. In order to ensure a just transition, an integrated approach towards mitigation and adaptation planning should take place, to ensure decisions on net zero support, rather than work against, efforts to protect vulnerable communities from the consequences of climate change.

Subject Policies (continued)

7 In light of the declared climate emergency and the requirements of The Climate Change Act (Northern Ireland) 2022, Can you provide any other evidence on how and why the Department should update, revise, and improve the SPPS to better support the Climate Change agenda? Please detail.

Answer7:

The RTPi published a report in June 2020 entitled 'Plan the World We Need', in response to the Covid-19 pandemic and the challenges it presented. The full report can be found here: https://www.rtpi.org.uk/media/5688/plantheworldweneed_june2020.pdf. Many of the findings and recommendations in that report also apply to planning's response to the climate emergency. It is vital that planning policy moves away from a sectoral approach, to a place-based systems approach, focusing on inclusivity and fairness, sustainability and restoration, and resilience and adaptation.

RTPi NI also published its own 'Plan the World We Need', which focused on the role of planning in a sustainable, resilient and inclusive recovery for Northern Ireland. This response was centred on desired outcomes under three main themes: place, connections and governance. These can all be linked back to the UN's Sustainable Development Goals (SDGs). Outcome-focused planning is essential to ensure efficiency and sustainability and, in so doing, prove planning's worth. The full report can be viewed here: <https://www.rtpi.org.uk/media/5729/ni-plan-the-world-we-need-final.pdf>.

Whilst planning has a critical role to play in the Climate Change agenda, it has become increasingly difficult to consistently achieve its objectives. Part of this is due to the complexity of planning in a globalised world, but another problem is a loss of faith in the concept of planning. As the current crisis creates new complexities, all levels of government must work effectively to shift from crisis management towards enabling positive change, in a democratic and equitable way. This comes at a time when local authorities have made cuts to planning and development management. Instead, we must strengthen and invest in planning to better support the Climate Change agenda, building the capacity for critical place-based systems thinking. This will enable local and strategic plans to set ambitious visions which improve sustainability, resilience and inclusivity.

Summary of Questions

Your Details

8 Your name:

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10 The organisation you represent (if applicable):

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Next Steps