Department for Infrastructure 'Call for Evidence: A Future Focused Review of the SPPS on the Issue of Climate Change'

Causeway Coast and Glens Borough Council Response

1.0 Background

1.1 The Department for Infrastructure (DfI) published "A Strategic Planning Policy Statement for Northern Ireland (SPPS): Planning for Sustainable Development" in September 2015. In the intervening period the issues of resilience and mitigating and adapting to climate change have become more prevalent, particularly with regards to the wider efforts of government in seeking to address the challenges presented by a changing climate.

1.2 Since the SPPS was published in 2015, tackling climate change has become a legislative requirement and it is a priority consideration in the context of the work and functions of DfI, other departments and the wider public sector. This includes the Council, who has declared its own Climate Emergency.

1.3 In June 2022 the Climate Change Act (Northern Ireland) 2022 (CCA) came into force, setting a target of net zero greenhouse gas emissions by 2050, with interim targets for 2030 and 2040.

1.4 The Department for Agriculture, Environment and Rural Affairs (DAERA) launched a 16-week public consultation on 21 June 2023 on the related Carbon Budgets and sought views on the Climate Change Committee (CCC) advice report on 'The path to a Net Zero Northern Ireland'.

1.5 DfI are looking at how its policies can contribute to emission reduction in our carbon budgets as we chart the path to net zero by 2050. They are seeking views on how they can help improve how the planning system responds to the challenges of our changing climate, now and into the future, by supporting the Climate Change Agenda.

1.6 The 'Call for Evidence' (CfE) was issued on 3rd January 2024. It can be viewed at: https://consultations2.nidirect.gov.uk/dfi-1/future-focused-review-of-the-strategic-planning-po/supporting_documents/Call%20For%20Evidence%20Future%20Focused%20Review%20of%20the%20SPPS%20on%20the%20Issue%20of%20Climate%20Change.pdf

1.7 The primary purpose of the CfE is to engage with stakeholders on the proposed areas of focus for a potential focused review of the SPPS and to invite the submission of evidence on the relevant factors that can assist with determining the best way forward. The CfE relates to the following sections of the SPPS:

- The Purpose of Planning.
- Furthering Sustainable Development.
- The Core Planning Principles of the two-tier planning system.
- Flood Risk.
- Transportation.
- Development in the Countryside.

1.8 It is noted that any information gathered will help the Infrastructure Minister decide on whether to formally review the SPPS and if so, where the focus should be.

1.9 The closing date for submission of comments is Thursday 28th March 2024

2.0 Council Comment

2.1 The SPPS was published a few months after the Review of Public Administration (RPA) saw the majority of planning functions devolved to local government. As such, it reflects a time when the new two-tier planning system was in its infancy, and prior knowledge and experience of how that new system, and all its key stakeholders would consider, maybe differently, the purpose of planning and sustainable development generally. Clear strategic direction therefore needs to be provided to all stakeholders on these topics.

2.2 While the Council views the SPPS as strongly positive for overall sustainability, it also considers that, given the above intervening period (almost nine years) and the prevalence of events that highlight the impacts arising from a changing climate, any review must be undertaken with the above (2.1) in mind.

2.3 Regarding the specific questions posed in the CfE the Council wishes to comment as follows:

Purpose of Planning

Question 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.

2.4 This section is quite vague and, consequently, does not specifically set out an introduction to the issue of climate change and the reasons why it must be considered – to ensure that we are resilient and can mitigate and adapt to the impacts arising from climate change.

2.5 Updating this section in the context of the latest climate challenges could involve refining objectives to explicitly address climate resilience, mitigation, and adaptation:

- Integrating Climate Resilience and Adaptation: Emphasise not just sustainable development but also resilience against climate change impacts. Reduce vulnerability to climate-related risks, such as extreme weather events, and ensure that infrastructure, ecosystems, and communities can adapt to changing climate conditions.
- Mitigation of Climate Change: Reduce greenhouse gas emissions by promoting low-carbon infrastructure, energy-efficient buildings, renewable energy sources, and sustainable waste management. Development should contribute to achieving net-zero emissions targets.
- Ecosystem-based Approaches: Incorporate principles to ensure developments maintain, restore, and enhance natural ecosystems that provide critical services like carbon sequestration, flood mitigation, and biodiversity conservation. Prioritise green infrastructure and nature-based solutions.
- Future-Proofing Developments: Development could be future-proofed against long-term climate risks. This includes considering future climate scenarios at the planning and design stages, promoting the use of sustainable materials, and ensuring that buildings and infrastructure can withstand any anticipated impacts of climate change.
- Joined-up Working: Emphasise the need for a coordinated approach across different sectors and levels of government to address/tackle climate change comprehensively. Align with broader climate action plans, energy policies, and sustainable development goals, etc. ensuring consistency in efforts to combat climate change.

2.6 It may also be beneficial to refer to land being a finite resource, and in many council areas for example, an important economic asset of itself, primarily for the local tourist-related economy and agriculture.

<u>Furthering Sustainable Development</u>

Question 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

2.7 Updating this section could involve enhancing the focus on sustainability principles that are robust enough to tackle current environmental, social, and economic challenges, particularly those impacted or exacerbated by climate change:

- Sustainable Patterns of Development: Planning should promote sustainable patterns of development to allow more efficient use of public resources and to

reduce the negative effects of development. Therefore, the location of development, and the ease of access to supporting social and economic services, is a key consideration to the more efficient use of public resources.

- Sustainability Goals: Reframe sustainable development goals to prioritise climate resilience and carbon reduction, e.g re greenhouse gas emission reductions, renewable energy adoption, and energy efficiency in all development.
- Integration with Climate Goals: Align the principles of sustainable development with local climate action plans and international commitments, to ensure that local planning contributes to broader climate change mitigation and adaptation efforts.
- Strengthening Biodiversity and Natural Habitats: Expand the focus to protect, restore, and enhance biodiversity and natural ecosystems, which play a key role in climate mitigation and adaptation, while also providing resilience against climate-related events.
- Enhanced Resilience and Adaptation Measures: Clearly set out the need for infrastructure, communities, and ecosystems to be adaptable to climate change, ensuring that resilience is built into all development.

Core Planning Principles of the Planning System

Question 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.

2.8 Updating this section should include embedding climate resilience and sustainability at the heart of all planning principles. This revision is crucial for ensuring that the planning system is robust, forward-looking, and capable of mitigating climate impacts while furthering sustainable growth:

- Climate Resilience: Establish resilience as a fundamental planning principle, ensuring that all developments are designed to withstand current and future climatic conditions, minimise climate-related risks, and adapt to changes over their lifespan.
- Carbon Reduction: Development should prioritise energy efficiency, utilise renewable energy, and employ low-carbon technologies and materials.
- Sustainable Land Use: Promote land-use practices such as preserving green spaces, enhancing urban biodiversity, supporting sustainable agriculture, and preventing land degradation.
- Water Management: Incorporate principles of sustainable water management, including enhancing water efficiency, protecting water resources, and integrating green infrastructure.
- Sustainable Transport: Prioritise the development of sustainable transport networks that reduce dependency on fossil fuels, encourage public transport use, facilitate active travel (walking and cycling).

- Energy Efficiency and Renewable Energy: Energy efficiency should be a key consideration in all developments, alongside the integration of renewable energy sources, to reduce greenhouse gas emissions and reliance on non-renewable energy.
- Eco-friendly and Adaptive Buildings: The design and construction of buildings should be energy-efficient, adaptable to future climate conditions, and capable of incorporating renewable energy and sustainable materials.
- Green Infrastructure and Nature-based Solutions: The use of green infrastructure and nature-based solutions as central planning principles to provide ecosystem services, enhance biodiversity, and offer climate adaptation and mitigation benefits.

Flood Risk

Question 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.

2.9 Updating this section is crucial, given the increasing frequency and severity of flooding events due to impacts arising from a changing climate. This update could focus on enhancing resilience, incorporating advanced predictive models, and ensuring that development is adaptable and mitigates flood risks:

- Incorporating Updated Climate Data: Use the latest climate change projections and hydrological models to assess future flood risks accurately. This should include considerations for sea-level rise, increased rainfall intensity, and changing weather patterns that could affect flood frequencies and magnitudes.
- Risk Assessment and Mapping: Enhance flood risk assessments by using advanced mapping technologies to identify current and future high-risk areas. This includes updating flood maps to reflect changing landscapes and climate conditions, ensuring they are used effectively in planning decisions.
- Resilient Infrastructure Design: Promote the design and construction of flood-resilient infrastructure that can withstand flood events and recover quickly from their impacts.
- Green Infrastructure and Nature-based Solutions: Integrate green infrastructure and nature-based solutions like wetlands restoration, permeable surfaces, green roofs, and urban tree planting to enhance water absorption, reduce runoff, and provide natural flood mitigation. The Council considers that the requirement for a working strip (as set out at paragraph 6.123 of the SPPS) works against the natural process of a watercourse.
- Adaptive Land Use Planning: Implement adaptive land use planning strategies that avoid development in high-risk flood areas, prioritise the conservation of floodplains and (future-proofed) buffer zones, and consider the relocation of vulnerable communities where necessary.

- Sustainable Drainage Systems (SuDS): Encourage the widespread adoption of SuDS to manage surface water runoff, reduce the risk of flooding, and improve water quality. However, there is a need for regional SuDS guidance and long-term management and maintenance as there may be significant associated maintenance costs. Adoption by the DfI should be considered.

Transportation

Question 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.

2.10 Updating the "Transportation" section to address the latest climate challenges involves reimagining transport systems to be more sustainable, resilient, and aligned with climate action goals. This update could emphasise reducing transportation's carbon footprint, promoting alternative modes of transport, and enhancing infrastructure to withstand climate impacts:

- Low-Carbon Transport Planning: Shift the focus towards planning and developing low-carbon transportation networks, emphasising the reduction of greenhouse gas emissions through the promotion of electric vehicles, hydrogen fuel cell vehicles, and other clean technologies.
- Active Transport Infrastructure: Expand and improve infrastructure for active transportation modes such as walking and cycling, creating safe, convenient, and interconnected networks that encourage people to opt for these low-carbon travel options.
- Integration of Land Use and Transportation Planning: Foster a holistic approach where transportation planning is closely integrated with land use planning, encouraging high-density, mixed-use developments that reduce the need for long commutes and enable residents to live closer to work, amenities, and services.
- Resilient Infrastructure Development: Ensure transportation infrastructure is resilient to climate change impacts, such as extreme weather events and rising sea levels, incorporating adaptive design and materials that can withstand these conditions.

2.11 Realistic regional policy that works for both urban and rural areas is required.

Development in the Countryside

Question 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.

2.12 Updating the "Development in the Countryside" section to address the latest climate challenges should equally apply to development in urban areas where the majority of development is located. It should involve integrating principles that promote environmental stewardship, enhance biodiversity, support sustainable land use, and ensure that rural developments contribute positively to climate change mitigation and adaptation:

- Biodiversity Enhancement: Strengthen policies to protect and enhance biodiversity in all areas, ensuring that development does not compromise local wildlife, habitats, or ecological networks, and promotes habitat restoration and creation where possible.
- Climate-Resilient Infrastructure: Ensure that any development is designed to be resilient to climate change impacts, such as extreme weather events and increased flood risk, using materials and designs that are adaptable and resilient.
- Renewable Energy Integration: Promote the integration of renewable energy sources in all developments, such as solar, wind, and biomass, to reduce carbon footprints and enhance energy self-sufficiency.
- Water Resource Management: Ensure the sustainable use of water resources, protect water quality, and enhance the resilience of water supply systems to climate variability.
- Eco-friendly Building Practices: Encourage eco-friendly building practices that use sustainable materials, minimise energy consumption, and reduce waste, including the design of buildings that are energy-efficient and capable of incorporating renewable energy systems.
- Conservation of Natural Landscapes: Protect natural landscapes and discourage developments that lead to unnecessary land fragmentation or the loss of valuable agricultural land, ensuring that rural areas continue to provide ecosystem services and contribute to climate regulation.

2.13 Clear direction is also required on the need to ‘sustain’ our rural communities.

2.14 It is important that the planning system retains its focus on the land use elements of the development process and does not strive into areas governed by other legislation/remit of other bodies outside of Planning, for example, the Building Regulations, the Water (Northern Ireland) Order 1989.