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CIH Northern Ireland response to the Call for Evidence on A Future Focused Review of the Strategic Planning Policy Statement (SPPS) on the issue of Climate Change

General comments

The recent declaration of a climate emergency and the enactment of The Climate Change Act (2022) necessitate a critical review of Northern Ireland's planning policies. The Strategic Planning Policy Statement (SPPS) serves as a cornerstone for sustainable development, and its revision is essential to ensure it effectively addresses the challenges of climate change. This response outlines key areas where the SPPS can be strengthened to better support a low-carbon and climate-resilient future.

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.

The Department for Infrastructure (Dfi) can significantly strengthen the SPPS to address the challenges of climate change, as follows.

The urgency of climate action

The recently enacted Climate Change Act (2022) sets ambitious net-zero targets for Northern Ireland. These targets necessitate a significant shift in land-use planning strategies. The SPPS currently addresses sustainable development, including mitigating climate change and protecting ecosystem services. However, there's an opportunity to strengthen this section for a more impactful response to the climate crisis.

Balancing sustainability and social needs

While the existing SPPS acknowledges the three pillars of sustainable development (economic, social, and environmental), the urgency of climate action necessitates prioritising the environmental pillar in the context of planning decisions. This doesn't negate the importance of social needs. A just transition for communities and industries impacted by climate policies is essential to meet the needs of our communities and maintain public support for the journey to net zero.

Revisions for a sustainable future

To achieve these goals, Dfi should consider the following revisions to 'The Purpose of Planning'.

- **Explicit prioritisation.** Clearly state that mitigating and adapting to climate change is a primary objective alongside existing social and economic goals.
- **Embedding sustainability.** Integrate specific principles like low-carbon development, green and blue infrastructure, and ecosystem services into the planning process.

- **Promoting resilience.** Encourage development in areas with lower flood risk and good access to public transport, while also mandating climate change impact assessments for major projects.
- **Long-term perspective.** Emphasise long-term planning to ensure developments are resilient and minimise future environmental damage.

Benefits of a revised policy

By incorporating these revisions, DfI can create a stronger policy framework. This framework will ensure planning decisions prioritise climate change mitigation and adaptation, provide clearer guidance for developers to design sustainable and resilient projects, and ultimately reduce long-term costs associated with climate impacts. Furthermore, a just transition that addresses social needs will garner broader public support for the essential journey towards net zero emissions.

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.

The SPPS currently addresses sustainable development, including mitigating climate change and protecting ecosystem services. However, there's an opportunity to strengthen this section for a more impactful response to the climate crisis.

Enhancing climate change mitigation

The SPPS can move beyond acknowledging climate change mitigation to actively promote it. This could involve:

- **Specific targets.** Setting clear targets for reducing greenhouse gas emissions in new developments.
- **Low-carbon solutions.** Mandating low-carbon construction materials and energy-efficient designs for all new projects.
- **Sustainable transport.** Where possible, prioritising development near public transport hubs and incentivising low-emission transportation infrastructure like cycling lanes.

Building resilience through adaptation

The SPPS can be strengthened to emphasise adaptation strategies:

- **Flood risk management.** Expanding flood risk assessments to consider future climate scenarios and prioritising development in low-risk areas.
- **Heatwave resilience:** Encouraging green infrastructure projects like urban parks and green roofs to mitigate the risk of overheating in homes and the urban heat island effect.
- **Nature-based solutions.** Promoting natural flood defences and other ecosystem services that enhance resilience to climate impacts.

Integrating ecosystem services

The SPPS can better integrate the importance of ecosystem services:

- **Biodiversity net gain.** Implementing a mandatory 'biodiversity net gain' policy that requires developments to leave the environment in a better state.
- **Green and blue infrastructure investment.** Increasing investment in green and blue infrastructure projects that provide multiple benefits like flood control, improved air quality, and carbon sequestration for a positive impact on community wellbeing.

- **Ecosystem services mapping.** Developing detailed maps of ecosystem services to inform planning decisions and identify areas of high ecological value.

Evidence for change

The urgency of climate change demands a more proactive planning approach. Stronger policy strengthens investor confidence in sustainable development projects, while a robust framework can unlock funding opportunities for green and blue infrastructure projects.

Benefits of revision

These revisions will provide clearer direction for developers and planning authorities in achieving climate change goals. The result will be reduced carbon emissions, enhanced resilience to climate impacts, improved air and water quality, and the protection of biodiversity. By strengthening 'Furthering Sustainable Development,' DfI can position Northern Ireland for a more sustainable future.

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.

Strengthening core planning principles for climate action

The SPPS outlines five core planning principles that lay the groundwork for achieving sustainable development. While these principles touch on climate change, there is an opportunity to strengthen them to provide a more robust foundation for climate action.

Elevating climate change

The current approach can be improved by elevating climate change mitigation and adaptation to a standalone core principle. This would clearly signal its importance and ensure dedicated focus within the planning system. Additionally, integrating climate considerations into all existing core principles is essential. Every aspect of the built environment should demonstrably support a low-carbon and resilient future.

Specific recommendations for each principle

- **Improving health and well-being.** This principle should emphasise the creation of active travel infrastructure, such as safe cycling paths and pedestrian walkways, alongside the provision of green and blue spaces. These measures will promote physical and mental health while reducing reliance on private vehicles.
- **Supporting sustainable economic growth.** The SPPS should actively encourage the development of green businesses and industries that contribute to a low-carbon economy. However, it's crucial to ensure a just transition for sectors impacted by climate action, providing support and retraining opportunities for workers.
- **Supporting good design and positive place-making.** Mandating energy-efficient building standards and the use of sustainable construction materials would significantly reduce the environmental impact of new developments. Furthermore, promoting compact, walkable communities with easy access to public transport would not only reduce car dependence but also foster a stronger sense of community.
- **Preserving and improving the built and natural environment.** Implementing mandatory biodiversity net gain policies would ensure that developments leave the environment in a better state

than they found it. Prioritising natural climate solutions like tree planting and wetland restoration would not only enhance biodiversity but also provide valuable carbon sequestration benefits.

Evidence and benefits of change

The urgency of climate action necessitates a more prominent role for climate considerations in planning policy. Stronger policy frameworks attract investment in sustainable development projects, while a clear focus on climate action fosters innovation and creates opportunities for green jobs. By revising the core planning principles, DfI can provide clearer direction for developers and planning authorities in achieving climate goals. The result will be reduced carbon emissions, enhanced resilience to climate impacts, improved public health, and a more sustainable and competitive economy for Northern Ireland.

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.

The SPPS currently addresses flood risk and acknowledges the need to consider climate change. However, there's an opportunity to strengthen this policy to better manage flood risks in a changing climate.

Integrating climate change into floodplain definitions

- The current definition of 'flood plain' within the SPPS doesn't account for future climate scenarios. This is a critical gap. DfI should update the definition to explicitly consider projected increases in flood risk due to climate change.

- Utilising the latest UK Climate Projections (UKCP18) would provide an evidence base for informing floodplain boundaries. This would ensure that new developments are in areas with a lower risk of flooding.

Enhancing flood risk management

- A more proactive approach to flood risk management is necessary, with a focus on protecting vulnerable populations. DfI should implement a sequential approach to development, prioritising areas with the lowest flood risk for new construction. This will ensure that new developments do not disproportionately burden disadvantaged communities.
- Developers should be required to conduct flood risk assessments that consider not only current conditions, but also future climate scenarios informed by UKCP18 data. These assessments should also consider the potential impact on vulnerable populations, such as the elderly, people with disabilities, and low-income residents. This will ensure developments are designed and built to withstand future flood events while minimising risks to those who may have difficulty evacuating.
- Where appropriate, the SPPS should also encourage the use of natural flood management techniques like wetland restoration and river re-naturalisation. These techniques can not only reduce flood risk but also provide additional environmental benefits like improved water quality and habitat creation. Additionally, the SPPS should ensure that the implementation of these techniques considers potential equity concerns, such as ensuring no community is disproportionately burdened by the placement of floodplains or natural buffers.
- Current government planning guidance on flood risk could be strengthened by including specific measures for evacuation planning and temporary accommodation for vulnerable populations during floods. The SPPS should build on this existing guidance and provide clear and

comprehensive steps for ensuring the safety of all residents during flood events.

Evidence for change

Climate change predictions indicate a rise in the frequency and intensity of extreme weather events, leading to an increased risk of flooding. A more proactive approach to flood risk management is essential to protect communities and infrastructure from these impacts. Clearer policy strengthens investor confidence in flood-resilient development projects, while robust flood management reduces public and private costs associated with flooding.

Benefits of revision

By revising the 'Flood Risk' policy, DfI can ensure the planning system effectively addresses the challenges of climate change. This will lead to improved flood risk management, protecting communities and infrastructure from future flooding events.

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.

Strengthening the SPPS 'Transportation' policy for climate change

DfI recognises the transportation sector's significant contribution to carbon emissions and the need for change. The SPPS currently addresses transportation, but there's room for improvement to better support the climate change agenda.

Aligning with climate change goals

The revised policy should explicitly reference the Climate Change Act targets, demonstrating a clear commitment to decarbonisation. Furthermore, it should emphasise the "hierarchy in reducing the carbon impact of transport." This hierarchy prioritises reducing travel demand, shifting travel modes to public transport and active travel (walking and cycling), and finally, adopting sustainable fuels for remaining motorised transport.

Prioritising low-carbon options

- **Active travel infrastructure.** The SPPS should strengthen requirements for 'Active Travel Infrastructure.' This could involve mandating dedicated cycling paths, pedestrian zones, and safety improvements for non-motorised transport users.
- **Sustainable transport networks.** The policy should encourage the development of 'Sustainable Transport Networks.' This would involve investment in efficient public transport systems, shared mobility services like carsharing, and the integration of different transport modes to create a seamless travel experience.
- **Monitoring and reporting.** Robust 'Monitoring and Reporting' mechanisms are crucial. Regular assessments of progress towards decarbonisation goals will ensure the effectiveness of implemented strategies.

Land-use planning integration

The revised policy should strengthen Local Development Plan (LDP) requirements. LDPs should prioritise walkable, mixed-use developments that reduce travel needs. Furthermore, LDPs should ensure effective integration of land use and transportation planning, promoting accessibility for public transport and active travel options.

Evidence for change

The urgency of climate action necessitates a more ambitious approach to transportation decarbonisation. Clearer policy frameworks incentivise investment in sustainable transport infrastructure, while a focus on low-carbon transport fosters innovation and creates opportunities for green jobs.

Benefits of revision

A revised 'Transportation' policy can lead to significant benefits:

- Reduced carbon emissions from the transport sector, a major contributor to climate change.
- A healthier population through increased active travel and reduced reliance on private cars.
- More vibrant and liveable communities fostered by walkable, mixed-use development.

By revising the 'Transportation' policy, DfI can ensure the planning system plays a more significant role in achieving climate change goals and creating a more sustainable transport future for Northern Ireland.

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.

Rethinking rural development for a climate-conscious future

DfI acknowledges the complexities of balancing rural development with environmental protection, especially in the face of climate change. The current

'Development in the Countryside' policy within the SPPS offers opportunities for development, but there's room for improvement to better align with climate goals.

Promoting sustainable development

The revised policy should establish a sensitive approach that prioritises brownfield development and the reuse of existing buildings in rural areas, while also recognising the need to deliver new homes to meet social needs. This will minimise the need to encroach on pristine greenfield locations, protecting valuable ecosystems and reducing habitat loss, while acknowledging the constraints associated with brownfield development. Possibilities should be explored for limited greenfield releases only following a stringent sustainability assessment. Furthermore, all new rural development proposals should be required to demonstrate a net environmental gain. This could involve measures like planting trees to sequester carbon or creating wildlife corridors to improve biodiversity.

Envisioning low-carbon communities

The SPPS should encourage the development of compact, walkable rural settlements. These communities would have essential services and amenities within easy reach, reducing reliance on private vehicles and associated carbon emissions. Additionally, the policy should support renewable energy generation in rural areas, facilitating the transition to a low-carbon electricity grid. Promoting sustainable building practices, such as energy-efficient designs and the use of low-carbon construction materials, would further contribute to a reduced carbon footprint for rural development.

Enhancing rural public transport

Investing in improved public transport options in rural areas is crucial. This would provide residents with alternatives to private cars, helping to reduce reliance on fossil fuels. Exploring innovative solutions like demand-responsive transport services or microgrids for electric vehicles could provide greater flexibility and cater to the specific needs of rural communities.

Evidence for change

Unsustainable development patterns in rural areas often lead to urban sprawl, habitat loss, and increased greenhouse gas emissions. A revised policy framework with a clear focus on sustainability would incentivise investment in brownfield development and promote energy-efficient building practices. Furthermore, a focus on low-carbon rural communities would foster innovation in renewable energy and sustainable transport solutions.

Benefits of revision

By revising the 'Development in the Countryside' policy, DfI can achieve several benefits:

- Reduced pressure on greenfield sites and protection of valuable ecosystems in rural areas.
- Creation of more sustainable and resilient rural communities with lower carbon footprints.
- Improved quality of life for rural residents through better access to services and amenities, achieved through compact development and enhanced public transport options.

By taking these steps, DfI can ensure that rural development in Northern Ireland supports the transition to a low-carbon future while fostering vibrant and sustainable rural communities.

QUESTION 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.

Strengthening the SPPS through energy efficiency and collaboration

The SPPS can be further strengthened by addressing energy efficiency in new developments through collaboration with other government departments. This aligns with the overarching objectives of the Executive's Programme for Government, promoting a more sustainable future for Northern Ireland.

Promoting energy-efficient and sustainable buildings

The Department of Finance's Building Regulations Unit should introduce mandatory energy efficiency standards for all new developments that exceed current minimum requirements. This will ensure that new buildings are constructed to be more energy-efficient, reducing operational carbon emissions. It should encourage the use of on-site renewable energy generation in new developments. This could involve installing solar panels, wind turbines, or other renewable energy technologies to help buildings meet their energy needs and reduce reliance on the grid. As a long-term goal, DoF should explore the feasibility of requiring all new developments to be zero-carbon, achieving net-zero operational emissions. This would necessitate significant advancements in building practices and energy technologies but would ultimately contribute substantially to reducing the carbon footprint of the built environment.

Sustainable drainage systems

We acknowledge the potential of Sustainable Drainage Systems (SuDS) in managing water runoff and enhancing the sustainability of new developments. While DfI's current legislative framework for SuDS adoption may require further development, we encourage exploring mechanisms to overcome these challenges and incentivise the implementation of SuDS in new planning applications.

Joined-up approach to climate action

DfI should enhance collaboration with other government departments to ensure a more unified approach to climate action. This could involve establishing clear communication channels and fostering cooperation on climate-related policies. Aligning the SPPS with other relevant strategies and policies, such as those on residential buildings, energy, and water, would create a more comprehensive framework for tackling climate change. By working together across departments, the government can ensure that all its policies and initiatives are working in tandem to achieve ambitious climate goals.

About CIH

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