



MINISTERIAL ADVISORY GROUP
FOR ARCHITECTURE AND THE BUILT
ENVIRONMENT FOR NORTHERN IRELAND

PUBLIC CONSULTATION
10 YEAR REVIEW OF THE REGIONAL DEVELOPMENT STRATEGY
(SHAPING OUR FUTURE)
MAG RESPONSE
24 MARCH 2011



RAISING EXPECTATIONS

Public Consultation

10 Year Review of the Regional Development Strategy (Shaping Our Future)

Introduction

The MAG reports that the Department for Regional Development is consulting on a 10 year review of the Regional Development Strategy (RDS) which was published in 2001 and amended in 2008. The aim is stated to be to provide context and evidence, as well as a framework and guidance, for where development should happen over the next 25 plus years. The review of the RDS states that it is not just about land use but seeks to recognise the inter-relationships between physical development and economic, social and environmental issues. Government Departments are required to 'have regard to the RDS' in exercising any functions in relation to development (Strategic Planning Order 1999).

Headline Note: The MAG believes that the Regional Development Strategy is being **downgraded**

The MAG states that the RDS is important in the hierarchy of planning policy and guidance because it provides the framework within which development plans are prepared. With plan making powers devolved to local government under RPA, it will remain an important point of reference in testing the soundness of the statutory Local Development Plans to be prepared by the 11 new Councils. However, in the Planning Bill which is currently going through the Assembly decision making process, there is a requirement that the new councils 'take account of' the RDS in preparing their Local Development Plans. This will replace the previous requirement to be 'in general conformity' with the RDS and is generally regarded as a downgrading of the RDS.

Headline Note: The MAG believes that the Regional Development Strategy is **too detailed & repetitive**

The MAG would point out that the RDS review is 130 pages long plus appendices, a far cry from what was mooted by DRD a few years ago which was a focused 16 page document concentrating on key issues. However, the review is particularly timely in that it provides a spatial expression for the strategy for planning for recovery. The MAG believes that the emerging RDS is much more visibly connected than its predecessor to key aspects of government policy including the Programme for Government, the Sustainable Development Strategy, the Investment Strategy and the emerging Economic Strategy.

Headline Note: The MAG praises the Regional Development Strategy for **analysing progress** in implementation of the 2001 Strategy.

The MAG feels that the grounding of the new strategy in an empirical analysis of progress to date is helpful.

Content of the Review

The MAG reports that after addressing the drivers for a review and providing some commentary on how the context has changed since the original RDS was written, particularly economically and financially, the document moves to recast a Spatial Framework for the region and set out a series of new Strategic Guidelines which are described in varying levels of detail. The vision is necessarily long term and is stated as being focussed on positioning the region for recovery.

Developing a New RDS

Headline Note: The MAG considers that the Regional Development Strategy is **using confusing jargon** and should **trust local councils** to co-operate as they consider best suits their people and places

The MAG reports that Chapter 2 discusses challenges and trends of significance. While much of the original RDS is considered to be sound and is, therefore, carried forward, empirical analysis of performance against the original RDS in key areas is used to underpin new concepts such as "sub-regional centres" and "clusters" of settlements. The MAG believes that these new concepts cannot be artificially imposed as suggested by the new RDS. A "sub-regional centre" is an invention. If we were dealing with administrative units such as Counties, with strong historical and cultural identities, there would be very good reasons to have county towns with well defined functions. Debating about "sub-regional centres" (should it be Cookstown or Dungannon, for example?) does not lead to successful long term decision making about the location of investment.

No attempt seems to have been made to relate the proposed sub-regional centres, or the clusters, to the RPA and the proposed new 11 council areas. We need a joined up approach across government departments on such matters. To suggest that a "cluster" is Ballymena and Antrim, for example, while a new council area is Ballymena, Carrickfergus and Larne, is not credible.

Headline Note: The MAG considers that the Regional Development Strategy does not adequately acknowledge the effect of Planning Policy Statement PPS21 which encourages **many new single dwellings** on farms

The Regional Development Strategy describes the Key Policy Issues in Paragraph 2.13:
"Key Policy Issues

2.13 The RDS introduced new policy directions designed to achieve balanced growth across the Region. It reflected approaches being developed by Government Departments at that time together with new policy directions designed to achieve sustainable development. Of particular importance was:

- Balanced Regional Development: the balance between east and west and the role of hubs, clusters and housing development;"

The New RDS proposes a balanced approach to regional growth, with no change to the proportion of housing anticipated between the east and west of the region.

Headline Note: The MAG believes that the Regional Development Strategy does not recognise the effect of **personal choice** on where people will live

- "Housing and Urban Renaissance: housing figures, 'brownfield' development, compact urban forms and deprivation;"

The New RDS proposes a continued focus on growing the urban population and urban renaissance in the Belfast Metropolitan Area. The document notes that this would require a complete reversal of the present trend which has seen Belfast decline in population with growth in intermediate settlements and the countryside. The MAG considers that this is a trend likely to continue because of the availability of large and desirable rural sites at a cost which is less than smaller and to many people less desirable urban housing. The MAG notes with consternation that RDS has had no apparent influence on the policy in new PPS21 which gives the DoE the capacity to permit over 24,000 new dwellings (one per farm) spread across the Northern Ireland countryside every ten years.

- "Transportation: integrating land use and transportation, travel culture and accessibility;"

Headline Note: The MAG calls for radical re-thinking of the Regional Development Strategy and advocates **public transport, free at the point of use**, creating the opportunity for the necessary step change in people's travelling habits and encouraging greater frequency of public transport

The MAG notes that the new RDS places an ongoing emphasis on the need for an efficient, integrated and innovative transportation network with growth focussed in key centres to avoid unnecessary travel. The document notes that this will require a complete reversal of the existing trend which has shown a 27% increase in private car ownership and 19% increase in private vehicle distance travelled at the expense of public transport use which fell as 81% of journeys to work increased to 83% of journeys to work by private car. The MAG has used information presented in the new RDS on car registration numbers and total kilometres travelled to produce a financial cost (using figures published by the Automobile Association (the AA) for medium sized cars) and the most recently published Translink Annual Report. These calculations indicate that while Northern Ireland spends some £6 billion per year on private car transport the turnover of Translink is only £188 million per year. Not allowing for the road improvement costs currently in the budget, this society spends 97% of its transport costs on private cars and 3% on public transport fares and subsidies. The MAG advocates a dramatic intervention here, with an annual reduction in road improvements to be spent on providing public transport free at the point of use. Noting that the trend is significantly in the opposite direction to that proposed at the outset of the Regional Development Strategy in 2001, the MAG proposes that this ten year review is the time to use a radical means to promote the dramatic change necessary if the trend is not to continue to frustrate the Strategy for the next decade.

Headline Note: The MAG calls for the Regional Development Strategy to recommend **multi-use pathways** beside all rural roads in Northern Ireland, linking the RDS to the "2020 Vision" Road Safety Strategy launched in March 2011 which calls for review of the rural walking and cycling network in Northern Ireland

The MAG believes that the new Regional Development Strategy, which advocates environmentally sustainable change, could usefully include a strategic commitment to the provision of multi-use pathways on at least one side of every road in Northern Ireland. Implementation of this safer and more sustainable alternative to the "visibility splays", which appear thanks to Roads Service requirements at each new development along country roads, would be good for tourism where more and more people are walking and cycling on rural routes, good for local people and particularly children waiting for buses or walking home from school or bus stops. Conditioning every planning permission on the preparation of a multi-use path across each site frontage could provide a rapid and sustainable improvement in rural lifestyles. The majority of our rural roads were created before the advent of the motor vehicle and many of the smaller roads have not changed since traffic was horse drawn and moved at less than a relatively safe 20mph, not the 60mph presently permitted. Action Measure 46 of the Road Safety Strategy, 2020 Vision, published in March 2011 states "We will carry out a review of the cycling and footpath network in rural areas." DRD is the lead Department and the timescale is medium term. The MAG believes that this review should be carried out with greater urgency and the opportunity taken to link the provision of multi-use paths into the Regional Development Strategy and Planning Policies so that road safety is more closely integrated into development and planning.

- "Economic Development: the location of jobs, houses, services and Facilities"

The MAG finds that in the new RDS, there is a fresh approach to the spatial aspects of economic development, with a sharper focus on cities and larger urban areas as drivers for economic development. The MAG notes, however, that this is not backed up by any proposals in response to the reality that people are choosing to live elsewhere, for reasons given above, and that policies and procedures would need to be dramatically changed in government departments to reverse the present trends.

Vision and Aims

The MAG reports that in Chapter 3, the vision of the original RDS is retained but the aims of the strategy are recast slightly, with a better linkage to the Programme for Government. The aims are stated in bullet points in paragraph 3.5 as noted below:

- "Support strong, sustainable growth for the benefit of all parts of the Region"
- "Strengthen Belfast as the regional economic driver and Derry as the capital of the North West".

The MAG notes that these may be aims, but no mechanisms are offered to achieve them;

Headline Note: The MAG believes that the Regional Development Strategy is **not sustainable** because it willingly accepts thousands of new countryside houses, out of town shopping centres, free parking and longer commutes by car

- "Support our towns, villages and rural communities to maximise their potential".

The MAG considers that this aim is diluted by the variety of large and desirable sites on offer for countryside dwellings, by the acceptance by the new RDS of single function out of town shopping centres with free parking, the capacity to commute longer distances on faster, smoother roads and by the lack of integrated statutory based action planning to assist towns, villages and rural communities to respond to these circumstances.

- "Promote development which improves the health and well being of communities". The MAG notes that there is no strategy to implement this. Normal planning policies, building regulations and environmental health legislation do not permit development which has adverse effects on health and well-being and legislation currently being prepared introduces new powers of well-being to councils. However, we need a summary of guidance within the RDS.

- "Improve connectivity to enhance the movement of people, goods, energy and information between places".

In terms of people movement, the MAG notes that the improvement of connectivity can have unintended consequences, for example, creating tempting opportunities to commute longer distances to work while living on larger and apparently more desirable, but perhaps less sustainable, single detached properties in the countryside.

Headline Note: The MAG believes that the most cost effective and sustainable way to protect and enhance the environment is to encourage local people to **use, appreciate and enjoy** the places in which they live and work

- "Protect and enhance the environment for its own sake".

The MAG considers that this must have full local acceptability and advocates that using, appreciating and enjoying the environment must be recommended as the means to protect and enhance the environment in a cost effective and sustainable manner.

- "Take actions to reduce our carbon footprint and facilitate adaptation to climate change".

The MAG notes that the provision of wider, smoother, faster roads without any recommendation to reduce the cost and increase the frequency of public transport services will not produce a reversal of the present trend of increasing private car journeys;

Headline Note: The MAG states that while strong links beyond Northern Ireland are important, there is real benefit in **appreciating our own place** too

- “Strengthen links between north and south, east and west, with Europe and the rest of the world”

The MAG endorses this. Local provision, however, may be among the most important aspects of future lifestyles, where enjoyment of a simpler way of life, closer to home and family with excellent electronic links abroad, may create the happiest and most sustainable future.

The MAG believes that the stated aims are a clearer expression of the objectives of the strategy than the equivalent 'guiding principles' part of the original RDS. This suggests that there is a better fix on the future the Regional Development Strategy aspires to achieve. The new RDS states that the "Plan, Monitor and Manage" approach to housing provision is considered to have worked, with an acknowledgement that a 5 year supply of housing land should be achieved within districts going forward.

The Spatial Framework

The MAG reports that the original RDS contains a Spatial Development Strategy for the region. The review document recasts this as a "Spatial Framework" in Chapter 4. At the outset it indicates that while the preferred spatial approach is to promote development in Belfast, Derry City and in identified clusters of settlements, other options were considered, including continuing with the guidance in the original RDS. This suggests some sort of change in spatial emphasis which is something of a surprise given the suggestion in the preceding section that the original approach to balanced growth remains sound.

The MAG notes that the RDS review document is founded on the well established planning principle of a hierarchy of settlements dependent on their critical mass, service function and infrastructure. The Spatial Framework has been informed by an evidence base provided by work on settlement classification carried out by NISRA, research by Experian on the performance of key settlements and a study on business land requirements. The Spatial Framework is expressed by commentary on the Metropolitan Area centred on Belfast, Derry City hub of the north-west, sub-regional centres, clusters of cities and towns, the rural area and gateways/corridors. This approach is similar to the original RDS but there is a new emphasis on clustering in this review.

Headline Note: The MAG believes that if clusters of towns are to be expected to work efficiently together for public services, the **frequency of public transport** services in those areas has to be dramatically improved

The MAG understands that the central concept is that higher level infrastructure should be sited in the principal cities. These are described as Belfast Metropolitan area and Derry City Council area. Derry City is positioned as the hub of the north west and Enniskillen, Omagh, Coleraine, Ballymena, Cookstown, Craigavon, Newry, Downpatrick and Newtownards are identified as sub-regional centres. The following settlements are regarded as clusters of settlements where there may be a complementary relationship: Newry and Dundalk, Ballymena and Antrim, Coleraine, Ballymoney and Ballycastle, Craigavon, Banbridge and Armagh and Cookstown, Dungannon and Magherafelt. The

MAG notes that some of these "clusters" contain larger towns (sub-regional centres) and some do not. Some of these clusters bring together settlements under a proposed new council area and some cross district administrations and national jurisdictions. The MAG believes that clustering is best advocated at suitable local levels where empathies of administrative convenience or complementarity of services exist. Significant increase in public transport frequency and a likely revision of routes would be required to ensure that these clusters do not only exist for car users.

The MAG reports that there is some commentary on the need to sustain rural areas outside the principal cities, sub-regional centres and clusters. The Spatial Framework concludes with a section on gateways and economic corridors, including the Eastern Seaboard corridor.

The Spatial Framework part of the document effectively acts as a summary of the Strategic Guidance section of the document which is set out within the same five subsections and provides more detail on the high level strategy.

Strategic Guidance

Headline Note: The MAG considers that the new commercial development should not be for a single function such as shopping. It should instead be guided by well established **urban design principles**, incorporating housing, civic, recreational, and social facilities as well as commercial and shopping facilities

The MAG reports that Chapter 5 starts with the well established theme that the City of Belfast is losing population and cautions about the implications of a doughnut effect. Key guidance for the Belfast Metropolitan Area is to promote urban economic development at key locations throughout the BMUA and ensure sufficient land is available for jobs and to enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities. A specific strand within this guideline is to support and strengthen the distinctive role of Belfast City Centre as the primary retail location in the Region. In the MAG's view, developments and use of land should no longer be exclusively directed towards a single function such as "regional shopping" or a single land use such as "housing". Open countryside, hamlets, villages, towns and cities, through history and across the world, have successfully accommodated a wide variety of uses in close proximity by good management of places. Single function zoning of land is an indicator that management systems have failed and administrators have taken the easy but not necessarily sustainable option of separation of functions.

Headline Note: The MAG believes that the Regional Development Strategy should depend more on Northern Ireland's **superb Landscape Character Areas** and less on jargon

The MAG reports that Paragraphs 4.6 to 4.20 summarise guidelines on population, economy and environment for Belfast Metropolitan Area and Derry City Council area, the sub-regional centres, the rural area, clusters, gateways and corridors with greater detail being offered in Paragraphs 4.21 to 4.58. The MAG notes that the majority of the guidance for the two principal cities is very similar, indicating a non-specific view of their

characteristics now and in future. In the MAG's view 'the rural area' is being homogenised by the regional and area planning regime, therefore to recognise the diversity of Northern Ireland's landscapes, the RDS should recognise at its heart the excellent series of NIEA Landscape Character Assessments. The use of jargon such as "hubs, "gateways" and "corridors" can create a professional sounding document, but this can unintentionally exclude or demotivate the community or lay reader – leaving out large numbers of people that the regional and area planning system is endeavouring to include.

Headline Note: The MAG believes that Northern Ireland's **road design guidance is outdated** and should now include the use of the Manual for Streets (Department of Transport 2007) and Manual for Streets 2 (Department of Transport 2010) so that **town and city streets** can be designed for people to use and enjoy as places and not just be designed as roads for the efficient movement of traffic

The MAG believes that the urban environment needs particular attention, with an emphasis on the creation of places that are well maintained, well managed, well planned and well designed. To this end, it is acknowledged that Northern Ireland is significantly out of date because of the failure of the present system to acknowledge that "streets" are not the same as "roads". Northern Ireland has a single authority for roads and uses the same design guidance manual for all roads and streets. This is unique in the United Kingdom. In Great Britain there are separate design manuals for streets that recognise their multi-functional character. (Manual for Streets 2007 and Manual for Streets 2 2010, both published by the Department of Transport). It is acknowledged that roads are essentially for the movement of vehicles whereas streets should be joyful places where people can walk, cycle, meet, chat and have coffee, with vehicles still being accommodated, but in a manner which is secondary to these other important civic uses. The current road design manual that is used in Northern Ireland puts vehicle movements first, endeavouring to produce efficient conveyors of vehicles with sweeping wide radius bends and segregated functional areas to promote continuous flows of traffic, often creating hostile environments for people walking, cycling, shopping or relaxing in urban places.

Environment

The MAG reports that as might be expected this section of chapter 5 has high level guidance on energy, waste, the built heritage and the natural heritage.

Renewable energy is emphasised more than in the original RDS given the Strategic Energy Framework target of 40% of electricity consumption from renewable sources by 2020. The document recognises that this will mean more windfarms on and off shore, with a consequent need to strengthen the grid. The potential to integrate heat and electricity infrastructure is also emphasised.

The document restates the Waste Hierarchy principles (prevention to disposal) and the proximity principle.

There is further commentary on energy and waste in the subsequent section on Regionally Significant Infrastructure.

Society

Headline Note: The MAG considers that the Regional Development Strategy does not give guidance on important aspects of **urban renaissance**: place making, deprivation and diversity issues

Although there is mention of deprivation and diversity issues in this section, there is little by way of real guidance on how these matters are to be addressed over the next 25 years. Little guidance is offered for the provision of integrated services for both urban and rural populations – health, education, recreation, employment and accessibility. Instead the section deals principally with housing and reiterates familiar themes of supporting urban renaissance (SG21) and managing housing growth sustainably (SG22). In the renaissance section there is support for mixed use development; regeneration in areas of social need; and quality architecture, design and landscaping. More could be included on the key criteria for place making.

Headline Note: It is the opinion of the MAG that the Regional Development Strategy's change of brownfield definition **will not help** to promote local choices of tenures, costs, sizes and types of housing that make for **sustainable communities**

The MAG notes that the housing growth section explains how the target of 60% of housing within urban footprints will be revisited. Although ultimately very successful – the target has been exceeded each year since the original RDS – it is recognised that it may have contributed to pressure for higher density development in established residential areas and that the policy is more applicable to Belfast Metropolitan Area and Derry City Council area. The definition of urban footprint has already been amended and a new target for 'brownfield' development will be set following research by the Department. While this definitional change is interesting, there remains a drive to promote more housing in existing urban areas within the parameters of PPS7 and its Addendum. The MAG notes a discrepancy between the new definition of 'brownfield' land (commercial/industrial) and the aims of new PPS4 which is to protect industrial land. This needs to be reviewed as it will cause endless confusion.

The MAG believes that in reality people choose where to live and there is every likelihood that public sector housing investment will only happen to a very limited extent on farms or in the countryside. Private housing investment cannot be directed to urban centres where development is more complex and where only government sponsored development can be guaranteed. The valuable opportunity to create sustainable settlements with choices of housing size and tenure, which remain desirable characteristics of places where there has been least government or large private sector intervention, will be lost in the unnatural patterns being unintentionally promoted as part of the drive to regenerate towns and cities. There are plenty of examples where the provision of single tenure housing areas built on a large scale by both the public and private sectors has completely distorted towns and cities in Northern Ireland. That is why a more local rather than a regional approach to housing is highly desirable.

The MAG reports that the Evaluation Framework for allocating housing growth which is used in the preparation of development plans is carried through with some minor adjustment and some elaboration. Housing Growth Indicators (HGIs) are also to be

retained. It is recognised that there has been some misapplication of HGIs and the document takes care to emphasise the complementary role of the strategic directions of the RDS. The HGI numbers themselves are rolled forward on the basis of a new regional housing need projection without any change to the relative share of each district. While this has often been a part of the regional strategy which has necessitated debate and public examination, the current issues with the housing market and the fact that there is no change to the relative share of each district would suggest that this time there will be less controversy around HGIs. Distortion caused by PPS21 must also be considered.

Headline Note: The MAG notes that the Regional Development Strategy needs to move beyond separate land use designations and accept **new economic realities**; industry and commerce is changing fast and entrepreneurs need flexibility so that modern workers can choose to live beside or among workplaces when appropriate

Economy

The MAG comments that this section includes a new framework for evaluating and allocating employment land. When worked through and applied at development plan level, this should result in a more effective system of planning for employment land. However, there is little by way of strategic thinking on how to encourage private sector jobs, what key sectors N Ireland should be targeting (eg financial services, pharmaceuticals, knowledge based industries etc); what the key factors are which attract inward investment (eg choice of locations; speed of decision making; educated workforce; accessibility etc). To consider employment land to be somehow separate from other land is misleading, mid-twentieth century planning which is based on unproductive and unresponsive land use zoning. Work, school and leisure are now much more connected. The world beyond Northern Ireland does not work to our 9 to 5 routine and even if it did, responsive Northern Ireland companies would require to be awake during our nights to compete, co-operate and contribute as appropriate. Conditions in relation to industrial zoned land, particularly that owned by government departments such as DETI, specifically excludes living on the premises. Yet many entrepreneurs find that living beside one's work is essential. People therefore do not want to start businesses (often regarded as 'old fashioned businesses') where people travel to work and cannot live beside it. To benefit from the wider world economy, Northern Ireland needs to participate 24 hours a day with high quality internet connectivity. The RDS must not assume that everybody goes to work from 9 to 5 GMT/BST. It would be useful for the RDS Review to compare the locations of new enterprises – the ones that the NI Executive wishes to encourage – to see how many of them are based at or beside home and how many are located on official sites zoned for employment. Northern Ireland must waken up and encourage development that facilitates the realities of business rather than having policies which regulate development based on outdated patterns and notions of 'employment'.

Headline Note: The MAG believes that the Regional Development Strategy does not acknowledge the important **changing roles of new councils** under the Review of Public Administration

The MAG confirms that there is acknowledgement of how important telecommunications are to ensure NI's competitive advantage and some reference is made to tourism development. However, there is no cross reference to the important planning policy statements on these issues. RPA and the role of the new councils are not referenced.

Regionally Significant Infrastructure

Headline Note: The MAG considers that the Regional Development Strategy does not provide sufficient **leadership in new infrastructure** projects for Northern Ireland, unlike Scotland's national spatial structure

The MAG notes that the final substantive section of the document deals with regionally significant infrastructure. It offers material that was previously found in Appendix 11 of the original RDS to the effect that no plan can ever anticipate every development requirement or entrepreneurial initiative so there is a provision for unforeseen and imaginative proposals in the public interest which resonate with the key themes of the RDS. It goes on to identify the transport, telecommunications, renewable energy, electricity and waste sectors as comprising regionally significant infrastructure. Unlike other national spatial strategies such as Scotland's it does not provide a specific list of national infrastructure projects or provide any particular spatial expression of what projects should come forward and where. The MAG would point out that leaders in these sectors will, however, be interested to note that it recognises an inevitability about more windfarms both on and off shore, the need to strengthen the electricity grid and, in relation to waste, the delivery of significant new waste management infrastructure at a limited number of key sites, convenient to the major centres of waste production. There should be another bullet point which allows for imaginative proposals in the public interest in the wider field of 'heritage' – although always there should be a robust argument why the facility cannot be located within an urban area.

Implementation

The MAG comments that the final section of the document deals with implementation which is principally through Executive structures. Key indicators are identified which are mapped across to the aims of the strategy.

Conclusion of the MAG

The RDS should change to become more realistic, less 'top-down', less theoretical and more encouraging to business.

The RDS should have the serenity to accept the things it cannot change, the courage to change the things it can, and the wisdom to know the difference.

Adapted from The Serenity Prayer by Reinhold Niebuhr

Arthur Acheson, MAG Chair

24 March 2011