REVIEW OF THE REGIONAL DEVELOPMENT STRATEGY 2035

FINAL REPORT ON PUBLIC CONSULTATION

February 2012
1.0 CONSULTATION PROCESS

Introduction

1.1 Consultation on the 10 Year Review of the Regional Development Strategy commenced on 6 January 2011 for a three month period, concluding on 31 March 2011. During this period the Department held a series of public meetings, met with stakeholders and received written responses from consultees.

Public Meetings

1.2 Thirteen public meetings were held during the public consultation period. There were a mixture of morning, afternoon and evening events. A list of the dates and locations of the meetings is attached at Annex A. Attendance at the meetings ranged from 2 to 35 people, with a total of 124 attendees.

Stakeholder Engagement

1.3 In addition to the public meetings, the Department met with a number of stakeholders during the consultation period to provide further clarification of the strategy proposals. A list of these meetings is attached at Annex B.

Publicity

1.4 The consultation exercise and the date, time and location of all the public meetings were publicised through newspaper advertisements and press releases in the Belfast Telegraph, The Irish News and the News Letter, as well as local newspapers in circulation in the areas hosting the consultation events.

Written Responses

1.5 A total of 129 written responses were received to the public consultation. Copies of all the responses are available on the DRD website.
SUMMARY OF RESPONSES TO PUBLIC CONSULTATION QUESTIONS
ON REVIEW OF RDS

Consultation Question No.1
Have we identified the most significant factors impacting on the Region? If not, what should be omitted and/or what should be added?

Thirty Nine of the 129 responses commented on this question. Eleven of the responses commented that the revised RDS did identify the significant factors and welcomed the commitment to sustainable development and cross cutting issues such as climate change. Twenty eight of the responses provided specific comment on issues for inclusion on a wide number of factors and these included:

- Prominence of Newry
- Design quality
- Value and importance of landscapes
- Greater policy alignment between relevant spatial and policy decisions in ROI
- Extend locus of the RDS to the Marine environment
- More reference to issues emerging from the Rural White Paper
- Need an urban policy

DRD Response
All the issues have been considered and additional text and guidance included in the proposed new strategy in respect of the important position of Newry, design quality, landscapes, marine environment, Rural White Paper issues and a clearer link to the alignment with the National Spatial Strategy.

Consultation Question No.2
Do you agree with the aims of the RDS? If not, what would you change and why?

Twenty six respondents commented on the aims of the RDS, the majority of which were in broad agreement. Several welcomed the promotion of regional development in a balanced sustainable way. The remainder raised various issues including: regional disparity east/west of the Bann, an additional aim on
urban and rural design, shared aspiration of the Executive to doubling woodland cover, how Londonderry can be strengthened as regional capital, aim on the provision for quality in development, marine environment and finite supply of natural resources

**DRD Response**
The overarching aims of the strategy remain largely the same in the final document. However some of these issues such as how Londonderry can be strengthened as regional capital, the marine environment and the finite supply of natural resources have now been taken account of in the guidance.

**Consultation Question No.3**
Do you consider Alternative 4 is the most appropriate? If not what option do you consider more appropriate and why?

Of the thirty five responses to this question twenty five were in support of alternative four and five were not, with two of these preferring option 3. General comments received from the remaining responses included that tourism would be more diffused with this approach, option 4 should be amended to refer to Sub Regional Centres as focus for development and driving forces of the clusters, too many components of the framework, needs to be more focused on enabling existing urban centres to perform their roles better and that development needs to be focused and prioritised around Belfast, Londonderry and the other clusters.

**DRD Response**
The department finds it reassuring that around 70% of respondents agree that option 4 is the most appropriate.

**Consultation Question No.4**
Do you think the approach as illustrated by the wheel in Diagram 4.1 is useful? If not, what alternative approach do you suggest?

Of the twenty three responses to this question fifteen found that the approach was useful but that it was important that it not be too prescriptive or applied
too rigidly. From the remaining responses there was recognition of the conflict between sustainability and constraints on resources and that each level will already have greater or lesser service/infrastructure as a consequence of previous policy decisions. Two respondees did not consider the approach useful and were concerned that it would prevent growth and initiative. There was in general a need to further clarify the interpretation and use of the infrastructure wheel.

**DRD Response**
Infrastructure Wheel diagram has been amended in the proposed new strategy to provide a clearer indication of the services particularly those at a regional level and further clarification on the use of the wheel added.

**Consultation Question No.5**
Do you agree that Belfast as the regional economic driver of the region needs to be positioned as the regional centre for administration, commerce and specialised services? If not, why not?

Of the thirty two responses to this question eighteen agreed with this statement and six disagreed. Those who disagreed commented that Belfast should not be developed at the expense of other centres, that there should be a balanced spread of economic development and that less congested locations would stimulate the economy.

**DRD Response**
The department appreciates the concerns of other centres and is promoting economic development at cities and towns across the region. However, evidence indicates that successful regions need successful capital cities which spread their wealth across the region.

**Consultation Question No.6**
Does the spatial framework recognise the important role of the North West and Londonderry? If not, why not?

Nineteen comments were provided in response to this question with eleven responses supportive of the recognition given. Further comment from the
remaining responses suggested: that the City of Derry Airport and the former army base at Ballykelly should be referenced, that the strategic guidance should reflect that set out for Belfast, that the wider hinterland of Donegal is included and that the status as a university city be recognised.

**DRD Response**
The majority of these comments have been reflected in the final document with additional recognition given in the strategic guidance for Londonderry.

**Consultation Question No.7**
The Strategy proposes 9 sub regional centres. Do you agree with those identified? If not, why not?

Thirty two responses commented on this question of which thirteen agreed with the sub regional centres identified and thirteen disagreed. Three responses supported the designation of Dungannon in the mid Ulster cluster. Issues from the remaining responses included:

- Newry should be designated as the hub of the South East Region
- distinction should be made between Craigavon and the other Sub regional centres
- evidence does not support designation of Downpatrick,
- designation of Cookstown at the expense of Dungannon is subjective
- Belfast International Airport merits special status as a centre
- Bangor, Larne and Armagh should be sub regional centres
- concern over Antrim in the Ballymena cluster due to RPA proposals
- the position of Ballycastle should be investigated.

Thirteen of the responses welcomed a smaller number of key centres compared to the original RDS and that this represented a balanced distribution across the region.

**DRD Response**
The identification of sub regional centres was a key issue from the consultation responses. The focus of The Spatial Framework within the new strategy is to promote co-operation between places and encourage clustering of towns and cities so that services do not need to be duplicated but rather shared.
Consultation Question No.8
Newtownards has been included as a sub-regional centre, Should it be included in the BMUA instead?

Twelve responses received on this issue with three in support of Newtownards as a sub regional centre and seven recognising its close proximity to the BMUA instead.

DRD Response
Newtownards continues to be recognised as a main hub within the new strategy.

Consultation Question No.9
Do you think the concept of clustering cities and towns will enable greater economic prosperity and delivery of services? If not, why not?

Thirty five responses on this issue with twenty two in support of the concept of clustering and seven not in support. Of those who supported the concept several recognised that co-operation was needed between the towns and that the concept was important due to finite resources economies of scale. The issues raised by those not in support included: polycentric growth models rarely work, no adequate evidence base for the proposed clusters, private sector will ignore the RDS and the concept will encourage protectionist competition.

DRD Response
The department notes the concerns raised and has further developed the implementation section of the final document to take into account the challenges associated with clustering. These include working closely with local government in the transition period for the new planning system.
Consultation Question No.10  
Q10 Do you agree with the cities and towns that have been clustered together? If not, what would you cluster together and why

Of the twenty seven comments received ten are in agreement with the clusters and three are not. Those who agreed commented that the concept was logical. Further clusters suggested from the remaining responses include:

- Armagh and Monaghan
- Warrenpoint and Kilkeel with Newry
- Portstewart and Portrush with Coleraine
- Larne with Ballymena and Antrim
- Downpatrick with Ballynahinch and Newry and the Ards area
- Newcastle and Kilkeel
- Londonderry and Letterkenny

Other comments received include: the document does not reflect the emerging RPA, possibility of a negative impact on rural communities and that the clusters should be organic and allowed to develop naturally.

DRD Response  
Further text has been added to the proposed final document to explain the regional approach and that other relationships are not precluded from this clustering. Larne has been added to the cluster with Antrim and Ballymena.

Consultation Question No.11  
Q11 Does the spatial framework recognise the important function of rural communities?

Twenty five responses received, eight of which agreed that the framework recognises the important function of rural communities and eight who consider that the RDS does not. Other issues raised from the remaining responses include:

- the framework should explicitly identify a hierarchical approach to rural settlement patterns,
disappointed that less detail is included than in the original RDS,
must ensure better collaborative approach by the public sector,
RDS fails to appreciate issues of isolation, should acknowledge that a lot of the rural areas are situated within an AONB,
no reference to agriculture, forestry, fishing, mining and the extraction of construction aggregates,
concern at the homogenous nature that the RDS applies to the rural areas.

**DRD Response**
Further detail has been added to the final document to reflect the rural settlement patterns and to draw upon the issues raised in the Rural White Paper.

**Consultation Question No.12**
Q12 Does the spatial framework recognise the important role of Gateways?

Twenty seven comments in total on this question the majority of which were positive on the recognition given to the gateways. Additional comments included that Newry/Dundalk should have special status as the centre of the islands premier east coast corridor, no detail on how key and link corridors are expected to develop, fails to incorporate other transport methods, ie rail and communications/energy infrastructure, ports need more than just welcoming arrival areas.

**DRD Response**
The department has strengthened the recognition given to the role of the south east corridor through Newry and Dundalk in the new Strategy document. In addition the department considers that recognising the need for high quality connections to and from the air and sea ports embraces all forms of connections. In further consideration of the infrastructure needed at ports the department points to the fact that the guidance on Gateways should not be read in isolation and that the cross-cutting regional guidance on Economy, Society and the Environment will also apply to each of the geographic areas contained within the spatial framework.
Consultation Question No.13
Q13 Do you think the concept of Economic Corridors as described is useful? If not, why not?

Twenty nine responses have strong support for the concept of economic corridors and some concern that they do not lead to any reduction in the application of rigorous environmental criteria. Several respondents would like to see further direction and clarity on the purpose of identifying these corridors.

DRD Response
The department accepts the need for clarity on the purpose of economic corridors and has provided a more succinct application of the concept to reflect the economic role of the Regional Strategic Transport Network.

Consultation Question No.14
Do you agree with the Spatial Framework set out in this chapter? If not, what alternative approach do you suggest and why?

Fifteen of the twenty five responses were supportive of the framework and seven did not agree with the framework. Comments from the remaining responses include; would like to see more strategic direction and specific priorities for future development, appears to limit new or innovative development and suggest an additional element dealing with special resources. Several responses sought further clarification of the link between the RDS and the planning system.

DRD Response
Given the overarching nature of the RDS the intention is to provide high level guidance to assist the government departments and public bodies involved in implementation. The implementation section in the new strategy has been amended to provide further clarity on the link between the overarching spatial issues within the RDS and the relationship with the planning system.
Consultation Question No.15
Do you consider that the identification of a BMUA continues to be appropriate for forward planning purposes?

Substantial support for the identification of a BMUA from seventeen of the twenty three responses and only one response commenting that the RDS was viewed as serving the interests of cities and larger settlements.

DRD Response
The department notes the strong support for the identification of a BMUA.

Consultation Question No.16
Do you agree that Sprucefield should continue to be classified as a Regional out of town shopping centre?

Twenty nine of the thirty six responses to this question consider that Sprucefield should not continue to be classified as a Regional out of town shopping centre with the majority of these considering that towns and city centres should be the priority for all major comparison retail development. Six respondents considered that Sprucefield should continue to hold its classification.

DRD Response
The department notes the responses on this issue. As the consultation document made no proposals to change the designation, Sprucefield will continue to retain its status as a regional out-of-town shopping centre.

Consultation Question No.17
Does the guidance address the development of a strong North West and strengthened role for Londonderry? If not, why not?

Of the twenty three responses nine agree that the guidance does address the development of a strong north west and two disagree. The remainder of responses suggested additional issues for consideration including;
enhancement of the economic corridor between Belfast and Londonderry, adopting the Faughan Valley project, more detail to mirror that given to Belfast, how major private sector development will be encouraged, the importance of the link between two regions provided by the Magilligan-Greencastle ferry.

**DRD Response**
Additional text and guidance has been added to the proposed new Strategy document to reflect the issues addressed for Belfast and a greater consistency of approach adopted in the use of language applied.

**Consultation Question No.18**
Does the guidance address the key issues to promote economic growth in the Sub Regional Centres?

Responses were very mixed on this subject with eight responses commenting that the guidance does not address the key issues and seven considering that it does. The remaining nine responses have provided further issues for consideration including additional guidance on design, tension between growing Belfast and developing a balanced economic growth, too narrow a view of economic growth, built heritage should not be seen as an add on but as a core driver for development and regeneration and that large sport events will bring significant economic benefits to the region.

**DRD Response**
The department considered each of the issues raised and additional guidance has been added to the final document in respect of the design of buildings, economic growth in the clusters and on the economic benefits from sporting events.

**Consultation Question No.19**
Does the guidance on clustering enable places to attract economic development and deliver services that are functionally sustainable?
Eight of the responses are in favour of the clustering guidance, seven are not and of the remaining six responses, one recognised the challenge for councils in working together, one referred to the fact that towns are already partners in shared delivery and several had concerns on the expectations created by the infrastructure wheel.

**DRD Response**
The department recognises the challenges ahead and also recognises the fact that towns and councils do already work together. Additional clarification of the indicative nature of the infrastructure wheel has been provided in the final document.

**Consultation Question No.20**
Does the guidance on the rural area meet the needs of rural communities? If not, what areas do you consider have not been addressed?

Of the twenty eight responses ten consider that the guidance on rural is not sufficient and eight consider that it is. The remaining ten responses highlight issues which include:

- more focus on how rural communities will be maintained and supported
- doesn’t deal with growth in rural population
- hierarchal approach to rural settlement patterns should be reinforced
- need for policy to protect river and lake corridors
- lacks key details on the natural environment
- need to ensure integration with rural white paper
- areas for development for renewable energy should be clearly identified
- does not mention rural transport
- importance of environmental assets has to be acknowledged,
- does not take account of importance of tourism
DRD Response
The department has taken on board the comments and recommendations from the Strategic Environmental Assessment (SEA) and the Habitats Regulation Assessment (HRA) which addresses many of the environmental concerns raised. Additional guidance has been added in respect of tourism and key issues from the Rural White Paper

Consultation Question No.21
Does the strategic guidance address the key issues relating to climate change and clearly demonstrate what needs to be done in order to help improve the environment? If not, what suggestions can you make?

Thirty two responses to this question with eighteen considering that the guidance does not address the key issues relating to climate change and ten who consider that it does. The responses produced a considerable list of additional detailed issues for inclusion in the strategy. One of the key issues emerging is the balance between protection and development, another is the partnership approach needed to deliver environmental improvements and meeting climate change targets.

DRD Response
The department considered many of the issues raised, some were at a very low level or too detailed to be included in a high level overarching spatial strategy and many issues are already covered in other existing planning or environmental guidance. Additional guidance has been provided in the final document in relation to key issues affecting air quality, low or zero carbon energy sources, retrofitting of existing dwellings and re-use of vacant homes, grey water recycling, the Northern Ireland Biodiversity Strategy, green and blue infrastructure, Northern Ireland Landscape Character Assessment and the provision of water and sewerage services.

Consultation Question No.22
Does the strategic guidance address the key issues relating to our society and clearly demonstrate what needs to be done in order to help improve how we live and work? If not, what suggestions can you make?

Twenty one responses on this issue, eight of which agree that the social issues have been addressed and six of which disagree. Issues raised from
the remaining responses include; that the Local Government Waste Storage guide should be referenced, that community cohesion are enhanced by incorporating green infrastructure, further guidance needed on who takes the lead, the key will be to properly manage housing growth and that the RDS needs to ensure the mistakes of housing centralisation of the 70’s are not repeated.

**DRD Response**
The department has considered each of the issues and some minor text changes made to the revised strategy.

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**Consultation Question No.23**
Q23 Do you consider that the 60% target should be retained, dropped altogether or that the definition of land to which the target relates should be changed? If so what definition do you think is more appropriate?

A wide range of views on this topic, of the twenty six responses ten agreed that the definition needs to be changed, seven consider the target should be retained and four consider it should be dropped altogether. A mix of views expressed with some responses suggesting that the definition should only apply to Belfast and Londonderry and not to all towns and others agreeing that it should be promoted in all towns and cities. A diverse range of responses on the definition with little commonality other than the need for flexibility and a less restrictive definition.

**DRD Response**
The department considered a change of definition and target for brownfield land, however it is considered on balance to retain the target and the definition produced in 2008 by the 5 year review of the RDS. The department has also set in place a process to carry out research on housing development on brownfield land and will continue to monitor housing within urban footprints. This information will be used at the first review stage to assess the regional target and, if appropriate, set a revised figure within urban footprints.
Consultation Question No.24  
The housing figures in Appendix G are to be used as guidelines. Do you think these figures will be helpful in enabling local planning authorities to produce development plans? If not, how do you think housing need should be assessed?

There is little general agreement on this topic, of the twenty five responses seven agree that the figures are useful and eleven disagree. Several of the responses disagree with the quantum and the need for the figures to be updated periodically in line with development plan reviews.

DRD Response  
The new strategy intends that the figures should be retained with the flexibility of use stressed. They will need to be reviewed when small area statistics are available from the 2011 Census.

Consultation Question No.25  
Does the strategy address the key spatial issues for developing the economy? Is there anything you would add or omit?

Thirty responses to this question with nine agreeing that the strategy does address the key spatial issues for developing the economy and ten disagreeing. Other issues raised by the thirty respondees include;

- need for co-ordinated planning along the border,
- more flexibility for tourism opportunities,
- needs to be expanded for waste, energy and transportation
- Employment Land Evaluation Framework useful but could be expanded to include tests
- high quality landscape proposals have been proven to benefit the economy
- importance of mobile connectivity must be addressed in relation to telecoms
- low carbon economy should be the top priority and need emphasis on protecting mineral resources.
In considering the responses the department has added additional guidance on tourism and concluded that the environmental issues raised such as protecting mineral resources have been covered within the environment section.

Consultation Question No.26
Have we covered the most significant issues in the Strategic Guidance? Is there anything you would add or omit?

Of the thirty two responses to this question fourteen consider that the strategic guidance has not covered all the most significant issues. Further issues raised included, Newry as the hub of the south east, greater recognition of health, tourism, waste, energy, transportation, airport masterplans, environmental degradation, European Landscape Convention, social infrastructure along the border/midlands/west region, Woodland Access Standard Green new Deal, need to highlight potential role of each sub regional centre and to separate air quality from climate change.

DRD Response
Responses to this question generated similar issues to those raised in earlier questions and which have been addressed in the department’s responses to these questions. In considering the need to highlight the potential role of the main cities and towns within the clusters the department requested each council to provide an overview of the potential role of their areas and towns. This information, where provided, has been added to the section on clustering.

Consultation Question No.27
Do you agree with the types of projects that the RDS considers as being of regional significance?

Of the thirty responses to this question nineteen agree with the types of projects considered as being of regional significance. The majority of the comments received from the remaining responses related to naming specific projects and highlighting the need for environmental impact. There was also
some concern that flexibility was needed to enable other major economic projects to be included and a lack of detail on how these will be delivered.

**DRD Response**
The department considers that the RDS provides the flexibility to accommodate unforeseen imaginative proposals for economic development that are clearly in the public interest. No regional strategy can anticipate every major development requirement, technological advance or new entrepreneurial initiative. The Strategy is intended to be sufficiently flexible to allow the private sector to bring forward original development proposals which are of significance to the whole or substantial part of Northern Ireland and create employment, wealth and important assets for the Region. Similarly, major economic development proposals which contribute to meeting local needs and provide wider public benefits may also be acceptable.

The intention is to facilitate development projects in tune with the spirit of the Spatial Framework for the Region. This approach should enable the private sector to present a significant development project, or put together a major development package, which meets their entrepreneurial objectives and at the same time delivers wider public resource by providing, for example, desirable improvements to regional infrastructure and community services.

**Consultation Question No.28**
What are your views on how the Strategy will be implemented and monitored?

There were thirty responses to this issue and the common thread running throughout these responses was the need for local government involvement in the implementation. Other views expressed included the need for more regular meetings with the implementation groups, clearer roles and responsibilities, monitoring of the effects of actions and cohesiveness with other strategies.

**DRD Response**
The department accepts that more work was needed on completing the section on implementation and monitoring and has reworked this section to include the role of local government.
Consultation Question No.28
Q29 Do you think we have identified the most appropriate headline indicators? If not, can you suggest more appropriate indicators and if possible the source?

Twenty four responses to this question the majority of which provided suggestions for indicators and measurements to consider.

DRD Response
The department will set up a monitoring group to develop appropriate monitoring procedures. Indicators will be agreed to enable progress to be measured in implementing the strategy.
PUBLIC CONSULTATION EVENTS

Monday 24 January, 6pm, Canal Court Hotel, Newry
Tuesday 25 January, 10-30am, Burnavon Arts Centre, Cookstown
Tuesday 25 January, 2-30pm, Silverbirch Hotel, Omagh
Wednesday 26 January, 2pm, Waterfront Hall, Belfast
Wednesday 26 January, 6pm, Waterfront Hall, Belfast
Thursday 27 January, 2pm, The Braid Ballymena Town Hall
Thursday 27 January, 6pm, The Lodge Hotel, Coleraine
Monday 31 January, 2pm, The Millennium Forum, Londonderry
Monday 31 January, 6pm, The Millennium Forum, Londonderry
Tuesday 1 February, 10am, Downpatrick Cricket Club
Wednesday 2 February, 11am, The Clinton Centre, Enniskillen
Wednesday 2 February, 2pm, Strangford Arms Hotel, Newtownards
Thursday 3 February, 10am, Craigavon Civic Centre
Additional Consultation Events requested during the public consultation period

Regional Development Committee – 9 February 2011
Enniskillen Council – 15 February 2011
External Working Group – 16 February 2011
System Operator for Northern Ireland (SONI) – 18 February 2011
Institute of Directors – 23 February 2011
Mr McClarty MLA & Bill McClure – 28 February 2011
NILGA – 1 March 2011
Armagh Council Officials – 9 March 2011
Council for Nature Conservation and the Countryside (CNCC) – 14 March 2011
CBI – March 2011
RPTI – 22 March 2011
Newry & Mourne Council – 6 April 2011