



Reforming Planning in Northern Ireland  
Policy Paper

## Introduction

The Democratic Unionist Party is publishing a new policy paper which reflects on current concerns with the planning system in Northern Ireland and considers recommendations for how these must be addressed. This paper has been developed in conjunction with the representatives at all levels of the Party and taken into consideration comments from published reports and external stakeholders. The solutions are intended to be practical and deliverable.

Planning is an essential ingredient in the economic development mix and was devolved to the new Councils following local government reform in Northern Ireland. There is clearly a need for a balance between development and protecting our green spaces, one of our greatest assets. When we talk of significant Foreign Direct Investment coming to Northern Ireland, alongside growing our indigenous SME base, we must think carefully about how planning can help facilitate these critical outcomes. However too often we are regaled with stories and complaints from stakeholders, with a common theme – planning in Northern Ireland is not fit for purpose. This has been reflected in several reports<sup>1</sup>. This, therefore, must be a priority for change.

This paper begins by setting out the background to the current challenges and recent DUP statements and activity in this regard. It will then move to provide examples of why our slow and convoluted planning procedures must now urgently be reformed. In this context, settling for the status quo means settling for a planning framework that will prevent Northern Ireland fulfilling its potential. We do not believe this is an option. Having defined the challenge, the document will then set out seven areas requiring policy change.

- The Planning Process: Streamlined and Flexible
- Staffing: Better Expertise – Better Communication
- Designated Consultees: In General
- Designated Consultee: NI Water
- Local Development Plans
- Town Centre First Policy
- Planning Appeals Commission

The paper will then draw to a close with a series of policy recommendations.

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<sup>1</sup> <https://www.niauditoffice.gov.uk/publications/planning-northern-ireland>, <http://www.niassembly.gov.uk/news-and-media/press-releases/session-2021-2022/committee-says-planning-system-not-fit-for-purpose/>

## The Background Challenge

Planning in Northern Ireland is directed by the Northern Ireland Planning Act (2011). Roles and responsibilities are divided between local government and the Department for Infrastructure. The eleven councils in Northern Ireland are responsible for local development planning, determining the vast majority of planning applications and planning enforcement, whilst the Department is responsible for oversight and performance monitoring, planning legislation, regional planning and policy, determination of regionally significant and ‘called-in’ planning applications, departmental development plans, planning guidance and participation in the Strategic Design Group<sup>2</sup>.

Since this new structure came into being in 2015 there have been several reports highlighting structural weaknesses in the planning system.

In February 2022, the Northern Ireland Audit Office published ‘*Planning in Northern Ireland*’ which found that ‘*Northern Ireland’s planning system is not working efficiently and, in many aspects, is failing to deliver for the economy, communities or the environment*’<sup>3</sup>

Following on from this, in March 2022, the Northern Ireland Assembly Public Accounts Committee published a report, entitled ‘*Planning in Northern Ireland*’, commenting ‘*We recognise the importance of a properly function planning system.... the Committee is therefore very concerned at the failure of the system to deliver*’<sup>4</sup>.

It is also notable that some local councils themselves have recognised the deficiencies in the system. One noted that the present two-tier system is not fit for purpose and recommended that an independent review of the planning regime is required, which should be carried out externally by someone with international expertise, while another stated that enforcement was protracted and cumbersome<sup>5</sup>.

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<sup>2</sup> <https://www.infrastructure-ni.gov.uk/articles/ni-planning-system>

<sup>3</sup> <https://www.niauditoffice.gov.uk/publications/planning-northern-ireland>

<sup>4</sup> <http://www.niassembly.gov.uk/news-and-media/press-releases/session-2021-2022/committee-says-planning-system-not-fit-for-purpose/>

<sup>5</sup> Interviews with local representatives, October 2023

In addition to public bodies, real concern has also been expressed by business about the failure of our planning system. From the CBI<sup>6</sup>, FSB NI<sup>7</sup>, Renewables NI<sup>8</sup> and Retail NI<sup>9</sup>, as well as individual companies including SSE and Simple Power. They raise a range of issues which we agree deserve further consideration.

The above concerns have been further validated by several local and international investors, who have publicly affirmed that planning is a key factor in the investment process, and given current concerns, could lead to finance being directed to other regions. Given that Northern Ireland has consistently performed well in securing FDI, it is particularly concerning that it could now fall behind because of the inadequacies of our planning system.<sup>10</sup>

One of the sectors expressing most concern regards planning is the energy sector. This is unsurprising given the integral role of planning in developing energy sites, from standalone wind turbines to offshore wind farms to onshore solar farms, amongst others. Renewables NI have expressed concern that ambitious zero carbon targets will not be met until the planning system is reformed to perform more effectively in its decision-making processes.<sup>11</sup> For example, Northern Ireland has ambitious targets for 80% of electricity coming from renewable sources by 2030. To reach 80% by 2030, we need to double our current renewable capacity.<sup>12</sup> That represents the need for serious infrastructure development and at a time when concerns are being expressed that the planning system is actively dissuading investors from looking favourably locally. Notably, another significant operator - SSE Renewables - has previously called for planning policy changes if Northern Ireland's renewable energy targets are to be met.<sup>13</sup>

Finally, we acknowledge the work undertaken to date by the Department for Infrastructure through its Planning Improvement Programme. We recognise that this is beginning to address

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<sup>6</sup> <https://www.cbi.org.uk/articles/an-opportunity-to-level-up-planning-a-review-of-major-planning-processes-in-northern-ireland-1/>

<sup>7</sup> file:///C:/Users/Admin/Downloads/The-NI-Planning-System-The-Small-Business-View%20(5).pdf

<sup>8</sup> <https://renewableni.com/renewableni-highlights-need-for-radical-planning-reform/>

<sup>9</sup> <https://retailni.com/download/files/Revive-03.05.23.pdf>

<sup>10</sup> [https://www.investmentmonitor.ai/insights/uk-inward-investment-regional-competitiveness-index-fdi/#:~:text=London%20ranks%20as%20the%20UK's,of%20Northern%20Ireland%20\(1.64\).](https://www.investmentmonitor.ai/insights/uk-inward-investment-regional-competitiveness-index-fdi/#:~:text=London%20ranks%20as%20the%20UK's,of%20Northern%20Ireland%20(1.64).)

<https://www.belfast-harbour.co.uk/news/belfast-number-2-location-in-uk-for-fdi-36/>

<sup>11</sup> <https://renewableni.com/renewableni-highlights-need-for-radical-planning-reform/>

<sup>12</sup> <https://www.economy-ni.gov.uk/publications/energy-strategy-path-net-zero-energy>

<sup>13</sup> <https://www.sserenewables.com/news-and-views/2023/07/planning-reform-for-onshore-wind-critical-to-2030-climate-targets/>

some of the presenting weaknesses but are unconvinced that anything less than a fundamental structural and cultural overhaul will drive the considerable change that is needed.

### **Recent DUP Commentary**

Planning is an issue raised regularly to DUP representatives. In July 2023, Infrastructure Spokesman, Philip Brett MLA, noted:

*“The publication of this year’s planning statistics serves as a stark reminder of the clear failings of our planning system. This year we have witnessed yet another unacceptable increase in processing times for both local and major planning applications. At a time when the Department has spent £14 million introducing a new planning portal, many will question this use of public funds. A previous Audit Office report concluded that the planning system ‘doesn’t deliver for customers, communities or the environment,’ these figures reinforce that narrative. We cannot afford to have unnecessary delays which could be continually putting proposed investment at risk. It is long past time, that Northern Ireland had a planning system that was fit for purpose.”*

The most recent DUP Local Government manifesto also highlights the need for planning reform.

*‘Planning is an issue frequently raised by both constituents and businesses as failing to deliver for them. Despite multiple reviews there remain serious problems which must be addressed in the next term.*

*The DUP supports:*

- *New, stronger deadlines for statutory consultees to meet or face penalties*
- *Requirement times set between approvals and the issuing of notices*
- *The creation of Stakeholder Engagement Forums within Councils to promote positive development and identify problems at an early stage*
- *Environmental requirements clearly identified and adhered to by both applicants and local authorities*
- *Adequate funding of enforcement teams*
- *Monitoring of conditions and consistency of approach across the eleven councils*

- *More effective means of neighbourhood notification of planning applications - erection of notices and use of social media*
- *The creation of powers to allow Councils to tackle dilapidated buildings.*<sup>14</sup>

## **What Needs to Change**

To this end DUP local government representatives have been active in driving change in the planning system. This paper will build upon these commitments and reflect on the various issues of concern identified by those we have engaged with, internally and externally.

### **1) The Planning Process: Streamlined and Flexible**

It is generally recognised that there is a need to streamline and improve the application process.

Investors, developers and agents have expressed frustration to us about the Pre-Application Discussion (PAD) process.<sup>15</sup> They invest funds that are supposed to help them build their application with the planners to minimise problems later on, only for the planners to reject in later stages proposals that they have shaped for reasons that could have been highlighted in the pre-application process. We believe that there is now a case to review the system to ensure that it remains fit for purpose.

We (acknowledge) the modernisation of the online planning portal, but the concerning fact is that, despite significant investment, it is generally viewed as not being up to the standards that such a key piece of digital infrastructure should be. Moreover, it is also concerning that many confidently expected this problem to arise and that it would require fixing from the outset. There may have been flaws in the procurement process which allowed this to happen which must now be understood.

It can be difficult for applicants to access reasonable case progression updates after an application has been made. There has been a tendency to use the COVID situation as justification for this, which may have been appropriate to some degree. However, remote

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<sup>14</sup> <https://mydup.com/policies/local-government-election-2023>

<sup>15</sup> <https://www.belfastcity.gov.uk/planning-and-building-control/planning/applying-for-planning-permission/pre-application-advice>

working cannot be allowed to generate a breakdown in communications. There is a perception that planners currently are remote and this needs to be addressed, both to improve confidence in the system and deliver more efficient turnaround times for applications.

There are many stakeholders in the planning system, all with their own individual roles and purposes. Engagement with these stakeholders is a key part of the planning function. We believe there is merit in some combination of both face-to-face and digital means of stakeholder engagement. There is scope for different councils to have different approaches to engagement, but we are keen to highlight models that work well. We are aware that at least one council has embraced meetings with agents and developers on a twice-yearly basis, and this has produced positive benefits in relationship building. The key to such engagement is transparency. There will always be some who wish to portray such engagement in a negative light, but this should not dissuade positive engagement which ultimately improves local economic and social development. We also support wider planning engagement, with environmental and regeneration forums, for example, where they wish to engage.

The role of the elected member in the planning decision process is generally recognised by most as a positive. Members have a crucial role in the decision-making process within the system, carrying out specific planning functions, including the determination of certain planning applications for their local council, in the context of democratic accountability.

The planning system should be flexible to encourage development in areas where it is both required and possible, subject to assessing the views of the local community taken into account through a rigorous consultation process. We believe that planners should show pragmatism in agreeing changes to developments where changed conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing the development mothballed. For example, the BUILD campaign in the Greater Shankill has rightly shone a spotlight on the issue of vacant sites being allowed to spring up across an area, decimating communities and allowing a greater sense of negativity and decay to take hold. This has taken place, despite proven housing need. We must examine what the planning system can contribute to address issues such as the Greater Shankill. There are many such small brownfield sites across Northern Ireland, which are suitable for housing but face historical barriers.

## 2) Staffing: Delivering adequate expertise

Staffing numbers and expertise have been significant areas of concern in relation to the issues in this paper. There is a perception that there is a lack of expertise within councils to address many of the issues around planning. This in turn has meant a need for external consultants. While we do not object to the use of external consultants per se, this raises questions about costs and internal capacity building.

We recognise that there have been significant pressures on planning departments since the transition to local government and that this urgently needs to be addressed. We believe that relevant bodies should undertake a detailed assessment of the skills challenges facing this area. We note that in England, a Planning Skills Delivery Fund is being introduced which is intended *'to help clear backlogs of planning applications and prepare for the implementation of planning reforms...and which can be used to source additional planning officers and other specialist resources'*<sup>16</sup>. We believe that Northern Ireland departments should adopt similar proposals to create what has been described as a *'super squad' of experts...to support the delivery of large-scale development projects.*<sup>17</sup>

As most councillors do not have a background in planning, it is essential that those with a planning responsibility receive training to ensure they have the knowledge and understanding to discharge their responsibilities. With this in mind, we believe that there should be greater investment in an ongoing training programme for members, which should enhance their capability and professionalism. We note the stated intention of the Scottish Government to *'prohibit elected members from carrying out certain specified planning functions if they have not completed training specified by Scottish Ministers'*<sup>18</sup>. We are not convinced this is necessary and have concerns that it could lead to greater problems around timescales but there is merit in tightening up the process determining which members can sit on planning committees over the course of their terms.

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<sup>16</sup> <https://www.gov.uk/guidance/planning-skills-delivery-fund-year-1-guidance-for-applicants>

<sup>17</sup> <https://www.planningresource.co.uk/article/1838053/goves-new-super-squad-expert-planners-likely-work>

<sup>18</sup> <https://www.gov.scot/publications/mandatory-training-planning-elected-members/pages/11/>



### **3) Statutory Consultees: In General**

The current list of designated statutory consultees are as follows:

The list of statutory consultees to the planning process in Northern Ireland is set out in the Planning (General Development Procedure) Order (NI) 2015 and are DfI Roads, DfI Rivers, DAERA, DfC, DfE, NI Water, Health and Safety Executive for Northern Ireland (HSENI), and Airports and Councils (in relation to regionally significant applications).

In its written evidence on the Planning Bill, which established the Planning Act (2011), Belfast City Council highlighted consultee obligations as an issue of concern, noting ‘... *on the intended obligations to be placed upon designated consultees to respond in a timely and appropriate manner and the role of the Department and council in ensuring compliance with such obligations. This is particularly important in respect to the ability of councils to meet the proposed new ambitious timescales for processing planning applications and developing local area plans*’<sup>19</sup> This remains just as much an issue now as in 2011.

Widespread concern has been expressed about the role of designated consultees who can, make it virtually impossible for planning decisions to be made on account of their either not responding or responding very slowly. This is one of the main issues of concern for both applicants and indeed the planners themselves. We are sympathetic to the fact that currently many of these consultees are not resourced sufficiently to provide timely, specialised responses to consultations. However, it is intensely frustrating for applicants and we believe there should be ways found to speed up the process where possible. We also believe that this should include legislative time limits for consultees.

### **4) Statutory Consultee: NI Water: default rejection mode**

Although NI Water is no more a Statutory Consultee than the others mentioned above, its role in the planning process has become a particular cause for concern, raising distinctive difficulties that merit the provision of this dedicated section looking at NI Water’s role as a statutory consultee.

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<sup>19</sup> Planning Reform Draft BCC Reponse.pdf

There has been a concern for some time regarding the role of NI Water in the planning process. Undoubtedly the water and sewerage network is under serious pressure and requires significant investment going forward.

We are clear that any successful attempt to place Northern Ireland's planning system on a robust foundation must address the role of NI Water but are equally clear that this will only be possible once the strategic importance of NI Water for the Northern Ireland economy is properly recognised. This requires both appreciating how: i) under-investment in NI Water acts as a check on planning and economic development and ii) strategic investment in NI Water will promote effective planning and economic development.

### **i) The Link between Under-Investment in NI Water and Constrained Planning and Economic Development**

No house or business can be built without the provision of water and sewage facilities by NI Water and this acts as a major break on planning and wider economic development because:

‘Over the past 15 years the capital budget made available for investment in sewerage services has not been able to keep pace with the investment required to provide increased capacity to facilitate growth or achieve more stringent standards to achieve water quality targets. As a result, many of our sewerage networks and treatment plants are now having to operate at or beyond their design capacity, limiting opportunities for new connections and constraining economic development. We will work with principal stakeholders to agree a capacity framework against which future applications for new connections will be assessed. We will communicate these constraints spatially so that this can inform development plans by others.’<sup>20</sup>

The reason for this unfortunate state of affairs is that NI is unique in the United Kingdom in being funded by the state and not by consumers.

‘NI Water is in the unique position of being the only publicly funded, regulated utility in the UK. ... As a Government Owned Company and a Non- Departmental Public Body, NI Water is subject to public expenditure cuts and uncertainty over funding. While this may be manageable

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<sup>20</sup> <https://www.niwater.com/our-draft-strategy/26-27/>

for a short period, the continued underfunding of the Utility Regulator's regulatory settlements places progress on efficiencies at risk and could result in tangible impacts on service delivery, the local economy and the environment.'<sup>21</sup>

'Funding levels made available to NI Water in recent price controls have not been sufficient to stem the degradation of assets. As a result, our infrastructure is having widespread detrimental impact on the economy, by severely limiting development across the country in 25 of the 27 economic hubs identified by local councils for growth in the future.'<sup>22</sup>

In this context the Ulster Business School in its publication, Addressing Northern Ireland's Competitiveness Challenge, recommends:

- 'Enhanced assistance for NI Water to deal with the maintenance backlog and wastewater management to enable sustainable economic development of towns.'<sup>23</sup>

## **ii) The Link between Proper Investment in NI Water and Efficient Planning and Economic Development**

NI Water is not only an important strategic resource in the sense that if water and sewage connections cannot be provided, homes and businesses cannot be built. It is also endowed with a huge opportunity to become provider of Green Hydrogen.

Northern Ireland has a natural Comparative Advantage in the provision of wind energy. NI is a world leader in renewable wind electricity. Up to 75% of the electricity carried by the NI electricity grid at any time is from wind energy. The NI grid was among the the first in the world to achieve this level of electricity from Wind energy.<sup>24</sup> NI has rapidly scaled up capacity

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<sup>21</sup> Ibid.

<sup>22</sup> <https://www.niwater.com/sitefiles/resources/pdf/2020/pc21/ourstrategyfastread.pdf>

<sup>23</sup> [https://www.ulster.ac.uk/\\_data/assets/pdf\\_file/0011/948845/Addressing-NIs-Competitiveness-Challenges-final-report-6-September-2021.pdf](https://www.ulster.ac.uk/_data/assets/pdf_file/0011/948845/Addressing-NIs-Competitiveness-Challenges-final-report-6-September-2021.pdf)

<sup>24</sup> <https://www.soni.ltd.uk/newsroom/press-releases/ni-grid-carrying-world-le/>

in the last 14 years.<sup>25</sup> In 2022, more than half of NI's total electricity consumption was generated from renewable sources.<sup>26</sup>

The electricity generated by this wind energy could be used to power electrolysis for the extraction of green hydrogen and NI Water is uniquely well placed to exploit this opportunity for two reasons. First, it provides water, which is the source of green hydrogen. Second, it already has much of the infrastructure for doing so, numerous large-capacity grid connections at many of its sites.

This could be used:

- a) To generate hydrogen to power NI Water's fleet of 600 vans
- b) Sold in the Green Hydrogen Energy Market

Moreover, the oxygen that is released when water is broken down into hydrogen and oxygen can be used to speed up the water purification process and increase capacity, thus removing potential blockages to planning application.<sup>27</sup>

While some of the benefit arising from the proper deployment of NI Water has a direct and positive impact on planning, consideration of the other benefits is important, because it is only when the benefits of proper investment in this strategic resource are seen in the round that the full imperative for changing the funding of NI Water can be properly appreciated, and it is only when one fully appreciates the need for this change that one is most likely to create a situation in which NI Water is no longer a block to planning applications.

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<sup>25</sup> Fernández, L. (2023) 'Cumulative installed capacity of wind power in Northern Ireland from 2008 to 2022' Statista [Online]. Available at: <https://www.statista.com/statistics/497294/cumulative-installed-capacity-of-wind-energy-northern-ireland/#:~:text=Northern%20Ireland%20has%20a%20cumulative,of%201.43%20gigawatts%20in%202022>

<sup>26</sup> Magee, A. (2023) 'Wind power boost for NI renewable energy production amid calls for reform', Belfast Telegraph, 9 March [Online]. Available at: <https://www.belfasttelegraph.co.uk/business/northern-ireland/wind-power-boost-for-ni-renewable-energy-production-amid-calls-for-reform/396887754.html>

<sup>27</sup> <https://www.youtube.com/watch?v=IUwC3Fiw5eA>

## 5) Local Development Plans

The Local Development Plan process has been ongoing since the new local government structure came into effect. We acknowledge the work undertaken by many dedicated staff but are concerned at the timescales involved. While some plans have been approved, others remain under scrutiny, some under further development and there are no final timescales as to when the process will be completed. This is clearly unacceptable and the imbalance between different council areas is not helpful in terms of wider economic development considerations. We are also concerned that by the time some plans come online they will be dated and therefore must undergo a process of review and updating, a never-ending administrative process. We believe, therefore, that central and local government should unite and streamline the LDP process, both in relation to those LDPs that have not yet been signed off and those that have.

Plans should be simpler, shorter, and faster in their preparation. We note that updated guidance in Great Britain has set a target of thirty months for a development plan. We believe this should be equally achievable in Northern Ireland, ‘...*in the new system, planning authorities will need to prepare, consult on, and adopt plans within a 30-month timeframe and follow the same process for each subsequent update of their plans*’<sup>28</sup>. We believe this change should be embedded through amendments to current planning legislation, to reduce the time it takes to develop a plan in each council area,

Although the fact that a number of councils still have not launched their plans generates a sense of disorganisation across Northern Ireland, this is positive in the sense that we believe there is a problem with the Planning Act 2011 that needs to be fixed as quickly as possible. In those council areas where the new plan has been adopted no transitional provisions have been made for those who made planning applications under the old rules and who were awaiting a determination when the new plan became operational. This has had the grossly unfair and unjust implication that people who have sometimes spent thousands of pounds in relation to applications made under the old arrangement find that the time and money they have spent has been wasted and they have to start the process all over again, which also slows down the

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<https://publications.parliament.uk/pa/cm5803/cmselect/cmcomloc/1122/report.html#:~:text=August%202020%2C%20Planning%20for%20the,on%20average%20to%2030%20months>

planning process yet again. In this context we believe that there is an urgent need for a change in the Planning Act:

Section 6, insert at end new subsection (5):

‘(5) (3) and (4) obtain subject to the fact that planning applications begun under the framework in place before the Local Development Plan, must be completed under the prior framework’s terms of reference. The Local Development Plan shall apply to all new applications begun on the day or on a day after the day on which the plan comes into operation.’

This will be particularly important for the 6 local authority areas that have not yet adopted their Local Development Plan. In cases where people have invested money on the basis of the old plans and lost money and experienced delay in having to begin the application process again, they should receive compensation.

## **6) Town Centre First Policy**

We recognise the value of the Town Centre First planning policy<sup>29</sup>, which is promoted by retailer representatives. As we seek to address the issue of town and city centre regeneration, we believe that a radical approach must be adopted to ensure their future viability. While we accept that retail habits are changing with the growth of online shopping, we accept that preference should now be given to existing spaces where feasible. However, we also recognise that associated issues such as parking charges and accessibility must also be taken into consideration.

## **7) Planning Appeals Commission**

We believe there is a need for a review of the Planning Appeals Commission in Northern Ireland in order to closely examine its role, accountability mechanisms and reporting timeframes. It is our view that consideration should be given to moving it under the remit of

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<sup>29</sup> <https://retailni.com/download/files/Revive-03.05.23.pdf>

DfI. If its stakeholders are to benefit from a fully functioning planning system then key elements such as the PAC must be properly resourced to ensure it is able to operate to its maximum capacity. It is not acceptable that such a key body operates at anything below that especially at a time when other bodies are working to attract investment to Northern Ireland, both from international and local investors.

### **Policy Recommendations**

We believe that if planning is to regain the confidence of its stakeholders, it must undergo a wide-ranging process of reform and investment. There are several policy issues which should underpin this process, as set out below:

- The role of DfI in planning should be overhauled, and its scrutiny role of decisions it has decided to 'call in' subject to more stringent time limits.
- Statutory agencies, who miss response targets, should have to engage directly with planning committees who are ultimately responsible for scrutinising applications. We are prepared to consider a default position of 'no objection' if no response is received within a defined time period.
- A fundamental but time limited review should be immediately set-up to make and drive the implementation of the long-term, strategic changes that are needed to make the planning system fit for purpose. This should be led by someone independent from the Department, ideally with international experience.
- Investment in a skills fund, to upskill new entrants and existing professionals in the planning field. We will use any Barnett consequential from a similar fund which has been created in Great Britain to support this fund.
- The impact of current planning requirements on rural development should be subject to an immediate review to ensure LDP's, no matter what stage they are at, help to promote and facilitate the wellbeing potential of rural life.

- The relationship with NI Water must be settled as part of a wider recognition of the importance of water to the NI economy, and therein the strategic importance of NI Water to the economic development of NI, for mutual benefit. Through a combination of proper investment in NI Water to help uphold infrastructure, and the deployment of oxygen technology to enhance the capacity of current infrastructure, we must seek to remove the reasons for NI Water to block applications and also require that any objections from NI Water are provided within a set time frame and with detailed explanation. Going forward, no response within the set time frame should be understood as ‘no objection.’
- There must be greater cross-departmental working to ensure planning is at the heart of economic, environmental and infrastructure development, and that policy frameworks are complimentary.
- Detailed consideration should be given to the allocation of greater weighting for the benefits of renewable energy when making planning decisions and for planning policy to be in step with existing and emerging turbine technology advancements.
- Each local council should create a Developer Forum, to improve direct, transparent engagement between public and private sector.
- Consultee responses should be subject to greater time scrutiny, including time limits unless there is a genuine concern about a danger to people or property.
- The Planning Act 2011 should be amended to introduce a transition period so that while anyone making an application on the day when a the New Development Plan comes into force, or on any day after that, must make that application on the basis of the New Development Plan, anyone who has begun an application prior to that date on the basis of one set of rules, should have it concluded on the basis of those rules.
- The Planning Act 2011 should be amended to introduce compensation for those who having spent significant sums of money in introducing a planning application under one set of rules were told, on the occasion of the introduction of the Local Development Plan, that they would have to go back to the start of the planning process under new rules and start again, wasting all the money and time invested under the old rules.



- The Planning Act 2011 should be amended to introduce a time limit for the publication of the Local Development Plan, so the LDP process must be finalised within a set period across the whole of NI.
- Where there is significant rural space, councils should create a dedicated team to manage rural applications.
- Northern Ireland should host a major infrastructure conference focusing on best practice in specialities such as planning reform.
- We accept the principle of Town Centre First planning policy.