



Preferred Options Paper  
Public Consultation Report  
July 2017

# Local Development Plan 2020-2035



Belfast  
City Council



## Executive summary

Belfast City Council is preparing a new Local Development Plan (LDP) for Belfast to guide development of the city up to 2035. The LDP will set out a vision for how the council area should look in the future. It will guide investment and set out the policies and proposals for the use, development and protection of land in Belfast. The plan will make economic growth possible, meet the needs of the community and help to manage and protect the environment.

The Preferred Options Paper (POP) provided the basis for consulting on a series of 48 options for dealing with key issues in the plan area. It outlined the vision, objectives and key planning issues affecting the city, possible approaches to new development and planned growth.

This report details the process involved in preparing and conducting the consultation on the POP, as well as the findings of the consultation. It highlights the feedback provided in relation to the strategic aims and vision as well as summarising the representations received for the preferred options and our responses to these.

### Vision, strategic aims and strategic objectives

The detail set out below provides a summary of responses to the high level, strategic elements of the POP covering the vision, aims and objectives. The four strategic questions were:

- **To what extent do you agree with the LDP vision?**  
Approximately 66 per cent of respondents were generally supportive of the LDP vision.
- **Do you support each of our strategic aims?**  
Those generally supportive for each of our four strategic aims ranged from approximately 64 per cent to 70 per cent.
- **Do you support each of our 19 strategic objectives?**  
Those generally supportive for each of our 19 strategic objectives ranged from approximately 61 per cent to 93 per cent. The highest levels of endorsement were for those objectives relating to waste and recycling, environmental challenges, access to public services and adapting to environmental challenge.
- **Do the aims and objectives strike the right balance between social, economic and environmental considerations?**  
Only 26 per cent of respondents felt our aims and objectives have not achieved the right balance between social, economic and environmental considerations.

## Overview of representations

A summary of the representations to the preferred options have been provided under each strategic aim.

### How will we grow Belfast?



- There was recognition that our growth aspirations are ambitious and questions raised as to whether they are deliverable.
- A robust evidence base is required to justify the level of growth proposed and show it is deliverable. Additional research will also inform the level of affordable housing need, housing mix and traveller need, etc.

### Shaping a liveable place

- Emphasis was placed on the potential to reuse vacant floor space within the existing building stock, particularly buildings of historic conservation value, to help meet growth aspirations.
- There was no general consensus amongst key stakeholders on how 'affordable housing' should be defined.
- There is a need to ensure that all requirements for new housing – such as design standards, lifetime homes, affordable housing requirements and housing mix – do not jeopardise viability.
- There is a need to review the evidence base in relation to the location of Houses in Multiple Occupation (HMOs).
- Respondents suggested that sustainable, balanced, inclusive, self-sustaining and well-designed neighbourhoods are needed and can only be delivered in partnership with those that will live there.
- There is a need for better accessibility for all to amenities, facilities and services.
- There is a need to recognise the importance of arts and culture.
- There was strong support for developer contributions for community infrastructure.
- While we were commended for seeking to address community cohesion and good relations issues within the POP, there was a general consensus that this needs to be given an even higher profile within the LDP.
- Policies need to promote child and age-friendly, developments and places.
- 'Placemaking' based on good urban design practice, should be promoted as key in making successful liveable places.
- There is a need to safeguard and protect the city's existing heritage whilst not unduly restricting or potentially hindering development.
- There was support for a policy on tall buildings, particularly in relation to managing where they should and should not be located.
- The emphasis on health and wellbeing was welcomed and supported.

- There was broad recognition that there are too many barriers and interfaces within the city which need

to be addressed in line with new development.

## Creating a vibrant economy



- Most respondents were in favour of the employment land supply preferred option. Flexible and varied supply of business accommodation and employment land is needed to increase employment opportunities, support investment in the economy and drive regeneration in the city.
- There was consensus that existing employment locations need protection. However, respondents also emphasised the need to adopt a flexible approach to ensure the ongoing beneficial use of land and maximise its potential in relation to changing demands.
- There was strong support for the 'city centre first' approach applied to development and job creation. However, this was balanced by respondents who recognised the need for sustainable, stable jobs and distribution of employment opportunities in areas of high unemployment and areas of multiple deprivation.
- There was strong support given to the preferred 'network of centres' to promote fairness across the city and provide communities with local services. Again, balanced with respondents who preferred the approach which enables the city centre to be a vibrant hub.
- The majority of respondents were supportive of managing uses in centres to provide diversity. There was broad recognition that retailing has evolved through online shopping and customers seek shopping destinations and retail experiences. The plan requires flexibility to support complementary uses such as cafes, restaurants and niche shopping to adapt to emerging trends and reduce vacancy.
- There was strong support for a 'city centre first' approach to support tourism and leisure development, to strengthen Belfast's role as the regional economic driver.
- The majority of respondents stated that city centre living would encourage vitality and a vibrant city that would be more welcoming for residents and visitors.

## A smart connected and resilient place



- There was recognition of the growing importance of access to high-quality digital communications and the need for sustained investment.
- Concerns were raised regarding capacity of the water and sewerage infrastructure and future requirements, particularly given our growth aspirations for the city.
- There was support for Sustainable Drainage Systems (SuDS).

- There was support for access to cheaper, reliable and secure sources of energy and in particular renewable energy.
- There was strong support for improved walking routes and high quality, segregated cycle routes.
- The need to reduce the impact of road infrastructure on inner city neighbourhoods was highlighted and there was support for design guidance for new infrastructure.
- Emphasis was placed on the need for close integration of land use and transport planning.
- Respondents suggested a need for greater investment in public transport and for the reduction of traffic congestion in the city.
- There was support for residential parking schemes.
- Air quality and congestion were cited as major problems in Belfast.
- There was support for active travel and green networks.
- There was a desire to reduce the need for travel with more local jobs and facilities.
- There was general support for renewable energy and energy conservation.
- The need to restrict development in flood risk areas was recognised.
- The role of renewable energy was recognised in the transition to a low-carbon economy.
- There was support for the circular economy and acknowledgement of waste as a resource.

### A green and active place

- The majority of respondents felt there is not enough open space in the city.
- The city centre was cited as being in particular need of more green space.
- There was a desire for more parks of all sizes that are easily accessible and connected.
- Significant opportunities for recreation in Belfast Hills and Lagan Valley were highlighted.
- The multi-benefits of green spaces were acknowledged – eg health, wildlife, amenity, etc.
- Respondents suggested that developer contributions and clear development standards are needed.
- The majority of respondents support the protection of important natural assets.
- There is a need for a balanced approach to ensure overall sustainable development.
- Belfast's landscape setting was seen as very special and important to protect.
- Respondents suggested that management of the urban fringe is needed.
- The multi-benefits of trees and woodlands was recognised.
- There was support for protection of trees and planting more trees.



# Contents

<b>1.</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Background.....	1
1.2	The Local Development Plan.....	1
1.3	The Local Development Plan process .....	1
1.4	Preferred Options Paper .....	2
1.5	Preferred Options Paper Public Consultation Report.....	2
1.6	Additional assessments applicable to the LDP.....	3
<b>2.</b>	<b>Consultation .....</b>	<b>5</b>
2.1	Preparing to consult.....	5
2.2	Engaging.....	5
2.3	Communications .....	7
2.4	Responses.....	8
2.5	Equality monitoring .....	9
2.6	Approach to analysis of responses .....	10
<b>3.</b>	<b>Vision, aims and objectives .....</b>	<b>11</b>
3.1	LDP vision .....	11
3.2	Strategic aims.....	13
3.3	Strategic objectives.....	16
3.4	Balance of aims and objectives .....	20
3.5	Issues missed from vision, aims and objectives.....	22
<b>4.</b>	<b>How will we grow Belfast?.....</b>	<b>28</b>
4.1	GR1 - Supporting economic growth .....	29
<b>5.</b>	<b>Shaping a liveable place .....</b>	<b>32</b>
5.1	LP1 - Accommodating new homes.....	33
5.2	LP2 - Social and affordable homes .....	36
5.3	LP3 - Ensuring an appropriate mix of housing.....	38
5.4	LP4 - Specialist accommodation for older people.....	39
5.5	LP5 - Traveller accommodation .....	41
5.6	LP6 - Shared housing provision .....	43
5.7	LP7 - Quality design in residential development .....	45
5.8	LP8 - Promotion of health and wellbeing .....	47
5.9	LP9 - Community infrastructure.....	49



5.10	LP10 - Community cohesion .....	50
5.11	LP11 - Urban design.....	52
5.12	LP12 - Arterial routes and gateways design.....	54
5.13	LP13 - Spatial connectivity.....	56
5.14	LP14 - Tall buildings.....	58
5.15	LP15 - Archaeology and built heritage .....	60
5.16	LP16 - Local distinctiveness.....	62
5.17	LP17 - Energy efficient design.....	64
<b>6.</b>	<b>Creating a vibrant economy.....</b>	<b>66</b>
6.1	VE1 - Supporting economic growth.....	67
6.2	VE2 - Strategic employment locations.....	68
6.3	VE3 - Protection of existing employment land.....	69
6.4	VE4 - Supporting development needs of higher education facilities.....	71
6.5	VE5 - Network and hierarchy of centres.....	72
6.6	VE6 - Defining the boundaries of centres.....	74
6.7	VE7 - Ensuring the vitality and viability of centres.....	76
6.8	VE8 - The city centre boundary.....	78
6.9	VE9 - The city centre primary retail core.....	79
6.10	VE10 - Supporting leisure and tourism in the city centre.....	81
6.11	VE11 - City centre living.....	83
6.12	VE12 - Shared space in the city centre.....	85
6.13	VE13 - City centre development opportunities.....	86
<b>7.</b>	<b>Smart connected resilient place .....</b>	<b>90</b>
7.1	SCR1 - Telecommunication infrastructure.....	91
7.2	SCR2 - Water and sewerage infrastructure.....	92
7.3	SCR3 - Electricity and gas infrastructure.....	93
7.4	SCR4 - Walking, cycling and sustainable modes of transport.....	95
7.5	SCR5 - Public transport network.....	97
7.6	SCR6 - Highway network.....	99
7.7	SCR7 - Parking demand management.....	100
7.8	SCR8 - Environmental quality.....	102
7.9	SCR9 - Mitigating environmental change.....	104
7.10	SCR10 - Renewable energy.....	106
7.11	SCR11 - Adapting to environmental change.....	107
7.12	SCR12 - Flood risk.....	109
7.13	SCR13 - Waste infrastructure.....	111

7.14	Minerals .....	112
<b>8.</b>	<b>Green and active place .....</b>	<b>114</b>
8.1	GA1 - Open space, sport and outdoor recreation .....	115
8.2	GA2 - Provision of new open space and green corridors .....	117
8.3	GA3 - Natural heritage .....	119
8.4	GA4 - Trees.....	121
<b>9.</b>	<b>Other comments .....</b>	<b>125</b>
9.1	Other issues raised.....	125
9.2	Site specific submissions.....	126
<b>10.</b>	<b>Sustainability Appraisal (incorporating Strategic Environmental Assessment) .....</b>	<b>127</b>
10.1	Consultation process.....	127
<b>11.</b>	<b>Rural Proofing .....</b>	<b>139</b>
<b>12.</b>	<b>Equality Impact Assessment (EQIA) .....</b>	<b>141</b>
12.1	Consultation questionnaire.....	142
<b>13.</b>	<b>What Happens Next? .....</b>	<b>147</b>
	<b>Glossary .....</b>	<b>149</b>
	<b>Appendix A: Respondents.....</b>	<b>164</b>
	<b>Appendix B: Equality monitoring.....</b>	<b>168</b>

# 1. Introduction

## 1.1 Background

Through the emerging Community Plan we are focussed on inclusive growth, the priorities are to balance economic growth with improved social outcomes and reduced inequalities. To support and influence future investment and development decisions, we are preparing a new Local Development Plan (LDP) for Belfast to guide development of the city up to 2035.

The LDP is required to provide a spatial framework and policies to shape future growth in a manner that will contribute to a smart and resilient city for the 21st century. It will be guided by an overall vision, which outlines where the city wants to be in 2035. The vision provides an overarching context for the plan that shows how economic, social and environmental considerations can be balanced to deliver sustainable development up to 2035.

An integral part of the vision and development of the plan is that local communities and stakeholders will be fully engaged in the process. This will help bring about the sustainable growth of the city and assist us to manage investment in a way that delivers tangible social, economic and environmental benefits.

## 1.2 The Local Development Plan

The Belfast Local Development Plan 2035 (or 'the plan') will set out a vision for how the council area should look in the future.

The plan will guide investment and set out the policies and proposals for the use, development and protection of land in Belfast. The plan will make economic growth possible, meet the needs of the community and help to manage and protect the environment.

It will have two documents:

- **Plan Strategy** – outlining an ambitious but realistic vision for the city; and
- **Local Policies Plan** – with specific proposals for the use and development of land.

## 1.3 The Local Development Plan process

There are three key stages in the LDP process. The first stage being the initial plan preparation, which comprises of the preparation of the plan timetable and the council's Statement of Community Involvement (SCI), alongside the production of the Preferred Options Paper (POP).

## Introduction

The publication of the POP Public Consultation Report marks the completion of the first stage.

The plan process will now enter the second stage, publication and adoption of the draft Plan Strategy with the final stage being the publication and adoption of the Local Policies Plan.

### 1.4 Preferred Options Paper

The POP provided the basis for consulting on a series of options for dealing with key issues in the plan area. It outlined the vision, objectives and key planning issues affecting the city, possible approaches to new development and planned growth.

The document provided 48 different preferred options grouped under the four strategic aims and was accompanied by a suite of supporting documents, comprising:

- 18 Topic Papers underpinning the preferred options;
- Sustainability Appraisal (incorporating Strategic Environmental Assessment) Scoping Report;
- Sustainability Appraisal (incorporating Strategic Environmental Assessment) Interim Report;
- Non-Technical Summary for the Sustainability Appraisal (incorporating Strategic Environmental Assessment);
- Countryside Assessment;
- Equality Impact Assessment (EQIA) Screening; and
- Commissioned reports on housing and population growth and economic growth.

### 1.5 Preferred Options Paper Public Consultation Report

The SCI was published in June 2016, which sets out our commitment to working with the community to develop a plan for the city.

The POP Public Consultation Report details the process involved in preparing and conducting the consultation as well as the findings of the consultation.

This report highlights the feedback provided in relation to the strategic aims and vision as well as summarising the representations received for the preferred options and our responses to these.

The consultation findings will be made available for respondents and the general public and will be used in subsequent stages of the plan preparation including drafting the planning policies.

## **1.6 Additional assessments applicable to the LDP**

The accompanying Sustainability Appraisal (incorporating Strategic Environmental Assessment) Interim Report (SA) and Equality Impact Assessment (EQIA) were also issued for consultation.

### **1.6.1 Sustainability Appraisal Interim Report**

The SA promotes sustainable development by assessing the extent to which the emerging plan will help to achieve the environmental, economic and social objectives. It will incorporate rural proofing to ensure due regard for rural needs are considered as part of the plan process.

A summary of the comments received in relation to the SA is contained in Section 10.

### **1.6.2 Equality Impact Assessment**

The EQIA report sets out how we intend to promote equality of opportunity throughout the LDP process. The EQIA responses and any issues identified through this consultation stage will act as a guide to develop engagement, consultations and reports, to shape equality screening going forward.

A summary of the comments received in relation to the EQIA is contained in Section 12.



## 2. Consultation

### 2.1 Preparing to consult

The SCI details the minimum level of engagement required during the LDP. Given the overlap of the Belfast Agenda and POP consultation periods there were opportunities for joint consultation events, with consistent and clear messages being communicated to stakeholders throughout.

### 2.2 Engaging

The POP 12-week consultation period began with the launch on 26 January to the close on 20 April. Every effort was made throughout the POP consultation and engagement process to ensure it was meaningful and inclusive.

The programme of events provided information to the public and facilitated general awareness while encouraging debate and the sharing of views. We encouraged participation in the consultation events and raised awareness of the plan process through supporting communications.

In total there were 82 consultation events.

- Four area events (with the Belfast Agenda and Local Investment Fund);
- 52 stakeholder consultations (including meetings with adjacent councils);
- 18 public facing engagement events;
- one drop-in session for Section 75 groups;
- internal staff events; and
- regular meetings with the LDP Steering Group and statutory consultees.

<b>Consultation launch event</b>	26 January at City Hall.
<b>Area events</b>	Four area events were organised along with the Belfast Agenda and Local Investment Fund. These events were held across the city in Girdwood, Olympia, Skainos and the Innovation Factory.
<b>Stakeholder consultations</b>	52 stakeholder consultations including meetings with adjacent councils.
<b>Public events</b>	18 public events were organised across the city in areas with high footfall to engage and generate awareness among the general public. These included, shopping centres, universities and tourist attractions.

## Consultation

<b>Communities of interest</b>	Engagement was carried out with communities of interest, including; <ul style="list-style-type: none"><li>• Youth groups, such as, Youth Forum, Festival Forum and Senior's Forum.</li><li>• Organisations covering specific areas of the city, such as, Belfast Area Partnerships, Neighbourhood Renewal Partnerships, Belfast Hills Partnership and Resident Groups.</li><li>• Business organisations, such as, Belfast City Centre Management, Belfast Chamber of Trade and Commerce and the Harbour Commissioners.</li><li>• Professional bodies, such as, Royal Institute of Chartered Surveyors and Royal Society of Ulster Architects.</li></ul>
<b>Section 75</b>	Throughout the POP process in order to facilitate Section 75 groups a drop- in session was organised in the Cecil Ward Building with a disability event held at Grosvenor Hall.
<b>Council events</b>	Internal events were organised to inform and generate awareness among council staff.
<b>Statutory consultees</b>	Regular meetings were held with the LDP Steering Group and statutory consultees.

Lessons learned from the POP consultation will shape engagement as part of the next stage in the plan development.

### 2.2.1 Youth POP

Belfast is one of the youngest cities in Europe with nearly a third of the population under 21 years old. Therefore, engagement with young people in the city to hear their views on the LDP was carried out through the Youth POP during the consultation period.

The Belfast City Council Youth Forum, which includes students aged 13 -18 years from communities across Belfast, helped to create the Youth POP. This is a supporting document to the main POP which provided tool for engagement with young people.

An online questionnaire was developed and linked to the main themes of the POP. Each question contained prompts relating to the 48 preferred options presented in each of the themes of the POP, to encourage thought and ideas from young people. Responses were treated individually and could be easily integrated and analysed uniformly within the full analysis process of the POP.

Youth Forum members agreed to take forward the questionnaire to their schools; 11 schools in total received the questionnaire.



## 2.2.2 Consultation materials

Throughout the engagement process materials were required to promote and inform audiences of the POP consultation. These included:

- POP - full document;
- POP summary or 'easy read' public document (made available in large print and Braille);
- Youth POP; and
- Information leaflets and promotional pop-ups.

## 2.3 Communications

A range of communications tools were used, integrating traditional and digital channels throughout the POP consultation period to reach as many audiences as possible. The communication tools included:

- Traditional communications:
  - newspaper advertising;
  - publications – City Matters (resident's magazine) and intercom (internal staff magazine); and
  - press releases.
- Digital communications:
  - Belfast City Council website;
  - social media – Facebook, Twitter and Instagram; and
  - online advertising – Facebook: boosted post, Google AdWords and Display advertising.

### 2.3.1 Traditional communications

#### Newspaper advertising

In line with the requirement of the SCI a public notice was issued for two consecutive weeks, on Friday 20 January and Friday 27 January 2017, in the following newspapers:

- Belfast Gazette,
- Irish News,
- Newsletter,
- Belfast Telegraph, and
- Belfast Media Group (North Belfast News, Andersonstown News, South Belfast News).

#### Publications

Council publications were used to inform staff and residents throughout Belfast of the LDP process and POP consultation period. Intercom, a bimonthly staff magazine and City Matters magazine, published five times a year and delivered to all Belfast ratepayers, 155,000 homes.

## Consultation

### Press releases

Press releases were circulated to media outlets at the launch and close of the POP consultation, with media interest also generated during the consultation period.

## 2.3.2 Digital communications

### Belfast City Council website

A webpage on the council site was created. Over the entire period of the consultation there were 2,433 unique page views to the POP webpage. The average time a visitor spent on the POP webpage was 8 minutes 26 seconds.

### Social media

Social media tools were used to maximise the audience reach, these included Facebook Twitter and Instagram posts.

### Online advertising

To further target audiences, paid for advertising was used from 13 March – 15 April, this included a Facebook boosted post, a Google AdWords campaign and direct placement advertising to online sites. All these campaigns delivered results which showed click-through rates well above the industry average.

## 2.4 Responses

### POP consultation

There were 148 formal responses to the POP received via email, Citizen Space and hard copy. In total:

- 44 responses were received via Citizen Space;
- 100 responses were received via email; and
- Four hard copy responses were received.

A list of all respondents is contained at Appendix A.

### Youth POP

Working with the Youth Forum, the Youth POP summary was distributed to 11 schools. This generated an additional:

- 47 Citizen Space responses; and
- 11 hard copy responses.

Of the schools contacted, 49 responses were received from the following schools:

1. Grosvenor Grammar School (17)
2. Dominican College Fortwilliam (6)
3. Belfast Royal Academy (6)
4. St Dominic's Grammar School (12)
5. Lagan College (7)
6. Our Lady's and St Patrick's College (1)

A further four responses were gathered from schools which were not members of the Youth Forum.

An additional five responses were received from three after school's clubs, including; Lagan Village After Schools, Lower Oldpark After Schools and North Queen Street Play Centre.

These responses were facilitated by our council play workers who used a hard copy of the questionnaire and the prompts to encourage comment from the younger children aged 5-9 years old.

The key issues highlighted by young people include:

- Better retail mix for the city centre
- More and accessible places for young people to go
- More sustainable transport – better public transport, more walking and cycling routes
- Re-use of existing sites for development
- Environmental sustainability including the use of energy efficiency technologies and renewable energy.

A list of schools who responded is contained at Appendix A.

### **Sustainability Appraisal**

Two formal responses were received to the SA via email.

A list of respondents to the SA is contained at Appendix A.

### **Equality Impact Assessment**

Three formal responses to the EQIA were received, one via Citizen Space and two via email.

A list of respondents to the EQIA is contained at Appendix A.

## **2.5 Equality monitoring**

An EQIA Screening was carried out on the POP. This is done in order to promote equality of opportunity throughout the LDP process. A summary of the feedback provided in relation to the EQIA is contained in Section 12.

In addition, the POP consultation made sure to target a wide range of groups representing s75 groups, including:

- Shared City Partnership;
- Youth Forum;
- Women's Resource and Development Agency;
- Section 75 Insight Project;
- Section 75 Consultative Forum;
- Migrant Forum;
- Seniors Forum; and
- Section 75 Disability Group.

## Consultation

We also carried out equality monitoring in relation to the responses received to the consultation, which is summarised at Appendix B. The equality monitoring questions were voluntary and so we are only able to report on those who have completed these sections.

### 2.6 Approach to analysis of responses

Citizen Space has been used to analyse and identify trends from the responses received. As the majority of responses were submitted via email or hard copy they were imported on to Citizen Space before analysis could begin. These responses were reviewed and allocated to the appropriate question on Citizen Space.

The consultation response form for most preferred options asked respondents whether they supported the preferred option, inviting a response of, 'yes', 'no' or 'don't know'. Many respondents did not complete this question but provided a written response. For the purpose of this report their comments have been categorised into whether:

- they support an approach or are 'generally supportive';
- don't support an approach or are 'not supportive'; or
- provide mixed or neutral views or are 'non-committal'.

At the beginning of some preferred options you will find an 'at a glance' summary which details the percentage of respondents who are, 'generally supportive', 'not supportive' and 'non-committal'. These terms can be further defined as:

- **Generally supportive** – respondents answered 'yes' in the consultation response form or comments were judged to be generally supporting a proposed approach. Please note, many of these respondents also raised issues or concerns, but were overall supportive of the approach.
- **Not supportive** – respondents answered 'no' in the consultation response form or comments were judged to be generally against a proposed approach.
- **Non-committal** – respondents answered 'I don't know' in the consultation response form or it was unclear from comments submitted whether the respondents was supporting the proposed approach or not.

Social media comments, Youth POP responses and comments recorded at engagement events were also considered during the analysis process.

## 3. Vision, aims and objectives

### 3.1 LDP vision

#### We asked

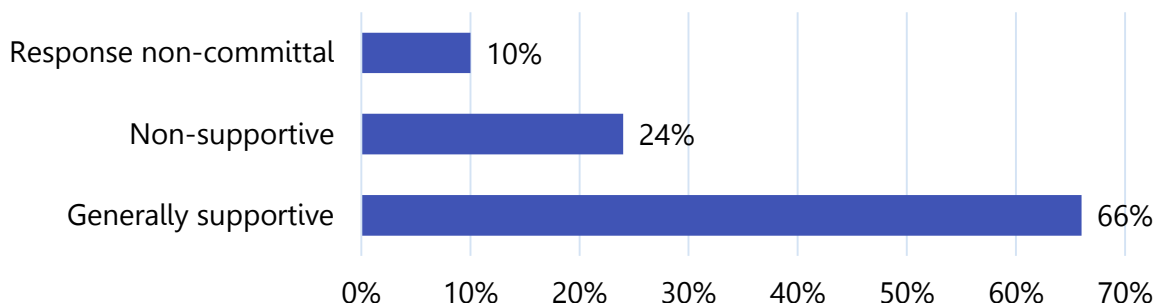
To what extent you agree with the LDP vision.

#### Our vision

Belfast will be a globally successful, dynamic smart 21st century regional city that is environmentally resilient with a vibrant economic heart. Bustling with sustainable mixed-use businesses that attracts investment, talent and visitors; and is surrounded by thriving well-connected neighbourhoods, where people love to live.

A strong local economy will support progressive, healthy, safe and vibrant communities and provides a gateway to opportunities locally, nationally and worldwide.

#### You said



- In total 71 respondents answered this question. Approximately 66 per cent of those respondents were generally supportive of the LDP vision.
  - They welcomed the LDP vision and fully supported the aim of creating a vibrant economic heart.
- Respondents who supported the LDP vision believed:
  - The LDP vision is clear and precise.
  - It is an ambitious and realistic vision.
  - The plan is impressive and they acknowledged it is a vision which aims to make Belfast a better and safer city for all.
- Respondents who disagreed with the LDP vision believed:
  - The LDP vision didn't make it immediately clear how the vision and objectives of the Belfast Agenda and LDP related to each other.

## Vision, aims and objectives

- It was too focused on the economy and prioritising economic investment and business over people.
- It was overly generalised and aspirational.
- It was too generic and lacked imagination and specific ambition.
- It said nothing about the uniqueness, identity and authenticity of Belfast.
- There was not adequate focus on the city's history, creativity, culture and politics and being renowned as a centre of learning and industry.
- Some also felt it fell short on the legislative requirement to further sustainable development.
- General comments in relation to the LDP vision included the need to:
  - Consider the challenges for delivery of the vision posed by the disconnection between planning at the local level and the regeneration function at central government level.
  - Ensure all government departments are linked into the process and signed up to the vision.
  - Be clear about good relations, it was suggested to include it as a cross-cutting theme or with Belfast's uniqueness being reflected in the vision.
- Suggestions for change to the LDP vision included the need to:
  - respond to the housing shortage;
  - include communities;
  - respect and preserve heritage and historic areas;
  - make clear reference to infrastructure;
  - embed, culture and arts;
  - take account of the role of the creative sector/industries; and
  - address issues of division and key spatial inequalities.

## Our response





- We welcome the support given to our vision, together with the constructive criticism and suggestions put forward in the comments we received.
- We will give consideration to all comments received, and to the suggestion to revisit the wording of our vision, especially relating to its being too general as well as omitting Belfast's uniqueness.
- In seeking the effective delivery of our vision, we will engage with the Department for Communities, which has responsibility for regeneration functions.
- We will consider whether changes are needed to the vision in relation to issues of division and key spatial inequalities that are experienced within the city. More broadly we will consider whether changes are required in respect of culture and identity.
- We will consider making amendments to our vision so that there is more explicit reference to those issues that have been suggested as potential areas for inclusion.

## 3.2 Strategic aims

### We proposed



### You said

	Aims	Generally supportive	This aim could be improved	Not-supportive	Non-committal
	Shaping a liveable place	63.93%	31.15%	1.64%	3.28%
	Creating a vibrant economy	66.13%	32.26%	0%	1.67%
	A smart connected and resilient place	68.33%	28.33%	1.67%	1.67%
	A green and active place	70.00%	25.00%	3.33%	1.67%

- The number of respondents ranged from 60, in respect of 'A smart connected and resilient place' and 'A green and active place', to 61 and 62, in respect of 'Shaping a liveable Place' and 'Creating a vibrant economy'.
- Of those respondents, support for each of our strategic aims ranged from approximately 64 per cent to 70 per cent.
- Respondents who supported the strategic aims believed:
  - The strategic aims are great. They set out simple, clear objectives for the city which are easy to understand.
  - All four strategic aims are clearly linked to the Belfast Agenda, showing cohesive approach to the delivery of the plan.
- Respondents made general comments in relation to our strategic aims, these included:

## Vision, aims and objectives

- The strategic aims lacked a shared city target to move beyond rhetoric to delivery, with good relations assumed, but not explicit.
- The need to start with the most deprived communities.
- The failure to mention or provide an indication of the role of the creative sector in contributing to key aspects of the aims.

Additional comments were submitted in relation to each of the strategic aims, these are summarised below.

### Shaping a liveable place



- The emphasis on health and wellbeing is welcomed and supported.
- The increase in density and the use of vacant and brownfield sites is important.
- Ensuring quality in residential areas is crucial.
- While heritage is mentioned, greater emphasis is needed for the protection and enhancement of the historic environment.
- Sustainable, inclusive and well-designed neighbourhoods can only happen with those that will inhabit them.
- Sustainable urbanism should be promoted as a key component in making successful liveable places.
- The commitment to provide shared housing is acknowledged, but it is important to tackle inequality in social housing provision.

### Creating a vibrant economy



- It is important to take a wider focus on the economy, and not concentrate on retail and office space.
- High streets require regeneration and support for small independent businesses, not shopping centres.
- Creating the conditions and support for regeneration opportunities to attract high quality inward investment and jobs is welcomed.
- The economy has moved beyond traditional economic uses, therefore, innovative solutions are necessary to achieve economic growth.
- Accommodation for business start-ups and emerging employment growth areas should be proactively planned for.
- Job creation should be aimed at those who are furthest from the job market as well as young people with all levels of qualification.

### A smart connected and resilient place



- There is a need for better cross-city routes instead of linear ones.
- The focus on a modal shift to sustainable transport is important.
- Consideration should be given to the navigational role of the River Lagan as a possible transport artery.



- Transportation needs to be more ambitious – we must be able to adapt to new technologies and innovation.
- There needs to be greater recognition of environmental protection.

## A green and active place



- Locations should be identified where particular types of development will be restricted or constrained.
- There could be more emphasis on linking/integrating developed areas and open space to make access easier and more natural.
- There is no reference to creating new and expanded green areas, particularly in residential areas.

### Our response

- We welcome support for our strategic aims and appreciate the comments received.
- We understand the unique circumstances of the city. In taking account of the comments received in relation to issues that are assumed, but not explicit, we will consider whether revisions are needed to our aims. Specifically, we will consider if revisions are required in relation to making more explicit reference to good relations/community cohesion, and associated issues such as deprivation within communities.
- We recognise that the historic environment makes an important contribution to the city and will review the need to strengthen our approach to the protection, enhancement and reuse of the city's built heritage.
- We welcome the many suggested issues to consider in relation to residential design and liveable places. These will be carefully considered and discussions with relevant organisations will help to inform the draft Plan Strategy.
- We also welcome the many suggested issues to consider in relation to the economy. We recognise the contribution of local independent and small business to the city and will aim to support local distinctiveness. We will seek to accommodate business start-ups and emerging employment growth areas, whilst aiming to ensure provision of an accessible job market.
- A Housing Needs Assessment/Housing Market Analysis will help to identify the right mix of housing tenures, including open market and specialist needs, to be facilitated through the LDP. In relation to social housing provision, consideration will be given of the need to tackle inequality.
- We welcome the many suggested issues to consider in relation to transportation. Transportation throughout the city will be dealt with in a holistic manner through a balanced approach that seeks to promote greater use of sustainable modes of transport. The LDP can seek to shape the physical environment to improve accessibility, such as ensuring all areas of the city are accessible by a range of transport options, including walking and cycling. Consideration will be given towards developments in

## Vision, aims and objectives

transportation technology, and the integration of new forms of transport that have potential to contribute to more efficient travel.

- We recognise that the natural environment makes an important contribution to the city. We will seek to protect, preserve and enhance the natural environment. By giving




consideration to the issues raised, we will seek to identify areas of development restriction/constraint, and also to encourage greater integration of developed areas to areas of open land, be it to existing greenspace or through the expansion or development of new green areas.


## 3.3 Strategic objectives

### We proposed

19 strategic objectives to support the vision and help deliver the city envisaged in 2035.

### You said

Objectives	Generally supportive	This aim could be improved	Not-supportive	Non-committal
(1) Growing the population of Belfast	75.00%	8.93%	5.36%	10.71%
(2) New residential development	66.07%	21.43%	1.79%	10.71%
 (3) High quality design	68.52%	16.67%	3.71%	11.11%
(4) Community safety	72.73%	14.55%	1.82%	10.91%
(5) Access to public services	81.82%	5.45%	1.82%	10.91%
(6) Protecting the historic environment	68.52%	18.52%	3.70%	9.26%
(7) Employment land supply	69.64%	19.64%	0%	10.71%
 (8) City centre and district centres	60.71%	26.79%	1.79%	10.71%
(9) Tourism and cultural infrastructure	61.82%	27.27%	0%	10.91%
(10) Regeneration	63.09%	18.18%	1.82%	10.91%
(11) Developer contributions	61.11%	25.93%	0%	12.96%
 (12) Sustainable transport	78.18%	9.09%	1.82%	10.91%
(13) Environmental challenges	83.02%	1.89%	3.77%	11.32%

Objectives	Generally supportive	This aim could be improved	Not-supportive	Non-committal
(14) Adapting to environmental change	81.13%	3.77%	3.77%	11.32%
(15) Waste and recycling	93.31%	1.96%	1.96%	11.76%
(16) Minerals development	74.00%	4.00%	10.00%	12.00%
(17) Open space, sport and recreation opportunities	69.81%	15.09%	3.77%	11.32%
 (18) Natural environment	76.47%	7.84%	3.92%	11.76%
(19) Protecting natural assets	78.85%	7.69%	1.92%	11.54%

- The number of respondents to each of our strategic objectives ranged from 50 to 56. With approximately 61 per cent to 93 per cent generally supportive of our strategic objectives.
- The highest levels of endorsement were for those objectives relating to waste and recycling, environmental challenges, access to public services and adapting to environmental challenge.
- Respondents who supported our strategic objectives is evidenced as follows:
  - They were in agreement with the overall thrust and direction of the strategic objectives.
  - The objectives provide the basis for developing Belfast as a liveable city.
- General comments on our strategic objectives, included:
  - That the plan objectives should reflect a requirement for disability access to all land uses.
  - That there is a need to set clear policies and to support implementation.
  - For an additional objective in relation to strengthening the knowledge economy and supporting the development of the higher education infrastructure.
  - That there should be a specific objective relating to promoting good relations.

Additional comments were submitted in relation to the strategic objectives which fall from the strategic aims, these are summarised under the relevant aims below.

### Shaping a liveable place



- There must be a policy to retain and reuse the city's built heritage without damaging the character of Belfast.
- The population doesn't need to grow.
- Growing the population will only be achievable if there is supporting infrastructure.
- Residential development should prioritise brownfield sites and also three-four storey buildings to prevent sprawl.
- Include a statement that design quality will require active street frontages.
- In terms of design quality of arterial routes and gateways, consideration needs to be given to points of arrival and the critical importance of creating the right first impression.
- Regeneration of under-developed parts of the city could be more explicitly encouraged.
- The Strategic Planning Policy Statement (SPPS) requirement for continuous five-year housing supply is not met.
- Objective 3, should be replaced by an objective focused on an approach to sustainable urbanism.
- Objective 6, should read 'to protect, conserve and enhance...'
- Objective 7, should make reference to the location of development relative to transportation measures and other land uses.

### Creating a vibrant economy



- Culture is tied with tourism. Culture and Arts is not just about tourism.
- Tourism infrastructure means more than isolated iconic projects.
- It is important to support local economies and ensure independent business needs and access to the city centre are not jeopardised.
- The city centre boundary could be altered to include other parts of the city.
- Adopting a 'city centre first' approach fails to recognise the importance of other, well established strategically located hubs.

### A smart connected and resilient place



- Planning is needed around the road systems and how we best use them in terms of travel.
- Consideration should be given to the navigational role of the River Lagan as a possible transport artery.
- It is reassuring to note consideration of environmental changes and the management of development to reduce the future risk of flooding.

## A green and active place



- Protecting the natural environment should not deprive society of affordable and sustainable homes.
- There should be green spaces and trees throughout the city.
- The potential use of greenspace as SuDS or temporary storage for excess water should be considered.
- Economic affordability must be considered in assessing sports and recreation opportunities.

### Our response

- We welcome support for our strategic objectives.
  - Policies will be brought forward in the draft Plan Strategy and draft Local Policies Plan.
  - We recognise disability access needs and will give consideration to the issue raised in this respect.
  - We will consider the need for additional objectives in relation to the knowledge economy and support for the higher education infrastructure, and in regard to the promotion of good relations.
  - We recognise that the historic environment makes an important contribution to the city and will review the need to strengthen our approach to the protection, enhancement and reuse of the city's built heritage.
  - While we acknowledge the competing views around growing the city, the growth of Belfast is a key objective of the Regional Development Strategy (RDS). It is necessary to help drive investment in the economy and create employment opportunities for all. We recognise that in achieving our growth aspirations, it is important to ensure that supporting infrastructure is provided.
  - We welcome the many suggestions for consideration in relation to design.
- These will be carefully considered and discussions with relevant organisations will help to inform the draft Plan Strategy.
- We recognise the contribution of local independent and small business to the city and will aim to support local distinctiveness.
  - A Retail Capacity Study will consider the health check of centres, review the state of centres and provide guidance on the centre boundary designation.
  - Within the SPPS, regional strategic objectives for town centres and retailing include a sequential approach to the identification of retail and main town centre uses in LDPs. Adopting a 'city centre first' approach also takes account of accessibility, including the transportation links to the centre of Belfast.
  - We will consider the need to identify more overtly a number of issues that have been flagged as being important in their own right. To this end, we will consider the various comments received in respect of the arts, culture and creative sector as being distinct from tourism.
  - We welcome the many suggested issues to consider in relation to transportation. Transportation throughout the city will be dealt with

## Vision, aims and objectives

in a holistic manner through a balanced approach that seeks to promote greater use of sustainable modes of transport. The LDP can seek to shape the physical environment to improve accessibility. Such as, ensuring all areas of the city are accessible by a range of transport options, including; walking, cycling and new initiatives that facilitate more efficient travel.

- We recognise that the natural environment makes an important

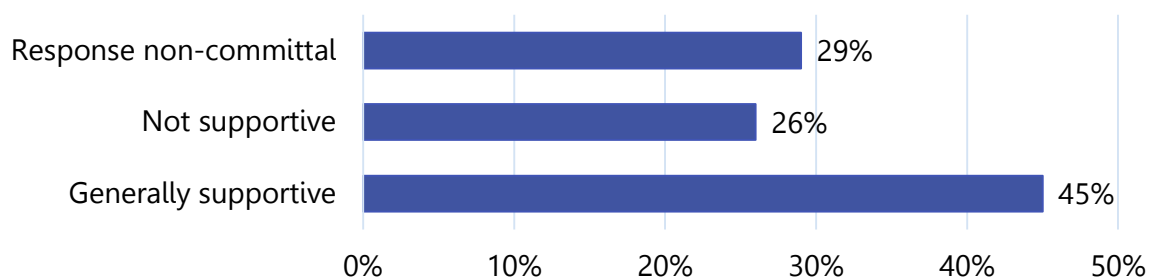
contribution to the city. We will seek to protect, preserve and enhance the natural environment while proactively accommodating development to meet the future needs of the city. By giving consideration to the issues raised, we will seek to encourage the use of SuDS through the city. This will help to identify areas of potential green space and ensure provision of open space that is accessible to all of the city's residents.

### 3.4 Balance of aims and objectives

#### We asked

Do the aims and objectives strike the right balance between social, economic and environmental considerations?

#### You said



- In total, there were 62 responses to this question. Only 26 per cent of those respondents felt our aims and objectives have not achieved the right balance between social, economic and environmental considerations. With 45 per cent being generally supportive and 29 per cent as non-committal.
- Supporting statements that the aims and objectives strike the right balance between social, economic and environmental considerations, including comments that:
  - There was a lot of thought put in to trying to achieve the right balance.
  - There is a commendable balance between the objectives, as they feature aspirations for all of Belfast's people. Acknowledging the importance of the environment amidst development and with a focus on growing the economy in an inclusive way.
- Other respondents considered the objectives to be balanced in most cases. However, drew attention to issues around implementation and factors of negative influence:
  - Previous development plans have repeatedly failed to strike the right

balance between social, economic and environmental considerations for a variety of reasons. The challenge for Belfast council will be to resist legal and other obstacles raised by powerful groupings who want to pursue their own agenda.

- Many of the objectives, while being well attended, need to be balanced against the commercial reality and tested against the viability of implementing them
- The wording does strike the balance but the reality is unfortunately very different.

Some respondents made specific comments in relation to the social, economic and environmental considerations. Primarily in regard to the prioritisation of some considerations over others. Examples of these comments are included under relevant thematic themes below.

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### Social

- There is a requirement for more references to an inclusive society with a need to plan from the outset for disabled access and provision.
- The priority should be to develop Belfast as a people centred place that in particular supports improved living conditions and opportunities for the more disadvantaged areas.

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### Cultural

- There needs to be some consideration given to 'cultural' – as distinct from the 'social' and in addition to the 'economic'.
- Cultural is incredibly important and there are concerns this is being eroded as Belfast is being shaped into another homogeneous space.

---

### Economic

- Economic development still takes undue precedence over environmental considerations.
- Economic development is prioritised well ahead and to the detriment of the environment, social health and heritage. In the longer term this will have a negative impact on the economy.
- Way too much emphasis on economic.
- Aims and objectives are overwhelmingly economic in their orientation. Put social wellbeing, liveability, culture, creativity and education first, and the economy will follow, not the other way around.
- At present macro and economic considerations dominate. It occurs we are a society not an economy.

---

### Environmental

- Too focused on environmental rubbish.
- Environmental should have greater priority.

---

### Regeneration

- The majority of the objectives strike a balance but a few could be re-considered in favour of regeneration.
-

## Vision, aims and objectives

### Heritage

- Built heritage should be given greater priority.
- More heritage consideration is certainly needed considering the amount of damage that has occurred in the last decade or more.

### Conservation

- Conservation and protection of our countryside, coast and hills is the very last out of 19 strategic objectives ... it should have more prominence in terms of its placement, given that so much of our health, our economy and our future depends on a healthy environment.

### Our response

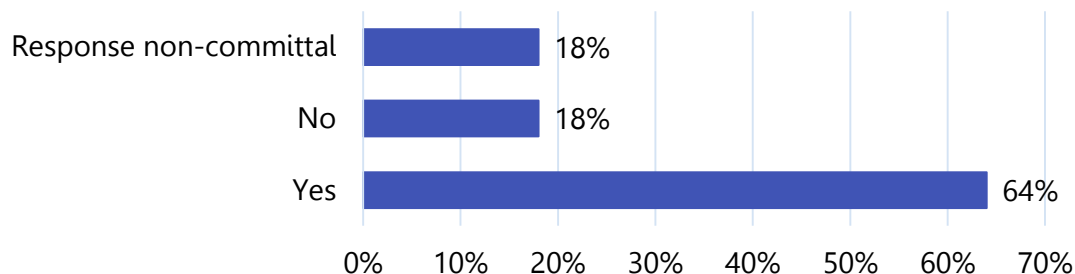
- We welcome the appreciation of those that consider us to have achieved the right balance between social, economic and environmental considerations.
- We acknowledge the potential for challenge to the balance between social, economic and environmental considerations and will respond to any challenges raised.
- We suggest that an appropriate balance has been achieved, but will take into account the comments of those respondents that feel certain considerations have been prioritised at the expense of others.
- We will consider reviewing our aims and objectives to see whether or not a greater balance is to be achieved. Or if explicit reference is required in respect to any of the issues raised, for example, in terms of regeneration, heritage and conservation.

## 3.5 Issues missed from vision, aims and objectives

### We asked

Are there any issues that we have missed from our vision, aims and objectives?

### You said



- In total, 66 respondents answered this question. Of those respondents, 64 per cent felt that there are issues that we have missed from our vision, aims and objectives.



Respondents raised a number of broad issues deemed to be missing from our vision, aims and objectives. One respondent suggested minor editorial revisions to the wording relating to some of the vision, aims and objectives. Other respondents made more specific comments, these are summarised under the broad thematic themes below.

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### **Planning charges**

- Consideration of the community levy fund which is implemented in England and Wales and encourages developers to build social housing.
- The implementation of Section 76, the equivalent of Section 106 of Planning Act in England and Wales.

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### **Social housing, deprivation and equality**

- The promotion of social and affordable housing.
- How will poverty in the city be addressed?
- Belfast City Council must guarantee that equality is being sought so that many communities within the city are not left behind.
- The need to address and bring to the forefront of the plan, the alleviation of a housing crisis, of low educational attainment, of poverty and inadequate living conditions, of limited access to healthcare, and of diverse life expectancy rates.

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### **Concepts of space and place**

- The word 'place' is all through the paper but misses the mark on what truly transformative place making is.
- The paper does not prioritise things that will make the city a better place in 2030 such as a civic centre that is based on shared space not commerce, retail that celebrates small local business over multi-national corporations, and a rates policy that animates space.
- The POP could more clearly acknowledge the key spatial 'types' that dominate the city: dead space; ethnic space; neutral space; shared space; cosmopolitan space. Ideally, the aim should be to expand the share of the city devoted to the promotion of the latter three spatial types.

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### **Transportation and land use**

- Connectivity between Belfast city centre and the two airports requires great improvement and should be addressed in the LDP.
  - The problems and expense of parking in Belfast, combined with lack of public transport and constant traffic jams resulting from lack of traffic flow strategies make it a difficult city to negotiate.
  - Other cities are combining new residential development and commercial developments with an increase in public green space.
-

## Vision, aims and objectives

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- Why is Belfast City Council not insisting on new green space as opposed to concrete in the new Belfast Transport Hub?
  - The city boundary should be expanded to include its natural hinterland.
  - There is a smaller, more focused office core within the city centre.
  - There should be a detailed centre hierarchy that gives priority to the heart of the city centre.
- 

### Arts, culture and the creative sector

- The role of the creative sector.
  - There is no mention of the arts, culture, creativity, apart from as a sub category of tourism.
  - The potential positive contribution of the creative and cultural industries should be recognised more.
  - The absence of the role of the creative sector in this plan.
  - Culture should lie at the heart of city development rather than being an add-on that is only addressed when other matters are dealt with.
- 

### Engagement

- There should be a focus on engaging people and communities.
- 

### Economy

- There should be a celebration of indigenous business as opposed to overseas investors.
- 

### Objectives

- Greater detail required on what the objectives aim for, and how they will get there.
  - A strategic objective on age-friendly design could be added.
  - A strategic objective on the use of space to build good relations, including intergenerational relationships could be added.
  - The council should consider how the proposed objectives will be delivered, measured and monitored.
  - As Water Framework Directive's objectives are currently failing. It is vital for the LDPs to recognise the need to protect and improve water quality.
- 

### Other strategies and policies

- Should be closer alignment with the emerging Industrial Strategy for Northern Ireland to provide certainty to those companies (in jobs growth sectors) that their proposal can be accommodated within the city.
  - Would like to see other strategies and policies included under the Regional Policy considerations.
-

### The Preferred Options Paper

- Lacks detail on how to achieve the aims and objectives.
- Consider the information contained within the POP to be lacking in terms of options, with only the preferred option presented.
- The importance of ecosystem services has not been fully explored in the POP.
- The LDP Topic Paper on Public Services and Utilities states that the council's preferred option for the future provision of cemeteries is a collaborative approach through working with adjoining local council areas. This is not carried through into the POP. It should have been included for public consultation and should be presented in forthcoming LDP drafts via operational policy.
- The RDS originally published in 2001 is not appropriate in relation to the aims and objectives of the Belfast LDP.
- Belfast's LDP Preferred Options Paper should acknowledge the interdependence and interaction with the LDPs of the surrounding council areas.

### Our response

- We welcome the identification of issues that respondents feel have been missed from our vision, aims and objectives. We will consider these issues as distinct elements, and also in the context of relevant sections of the POP.
- Specifically, we will consider those issues raised around important aspects of Belfast's contextual environmental that centre on social and economic difference. We will give greater consideration to the need to address more explicitly issues around concepts of; space and place, social and affordable housing, education and employment and other specific measures of deprivation.
- We acknowledge that connectivity between the city centre and the region's airports is an important issue. We will seek to improve connectivity by continuing to work with adjoining councils and through consultation with the airport authorities.
- We recognise the many problems in relation to transportation throughout the city, which we seek to deal with in a holistic manner through a balanced approach that promotes greater use of sustainable modes of transport. The LDP can seek to shape the physical environment to improve accessibility, such as ensuring all areas of the city are accessible by a range of transport options, including walking, cycling and new initiatives that facilitate more efficient travel.
- We acknowledge the comments in relation to planning charges and advise that, where appropriate, Section 76 Planning Agreements can be used to secure infrastructure provision and environmental

## Vision, aims and objectives

improvements, and will be brought forward under supplementary guidance.

- We aim to encourage more connected and integrated land-uses throughout the city, including proximate residential, commercial and green spaces.
- We will consider the need to recognise more overtly a number of particular areas that have been highlighted as being important in their own right. To this end, we will consider the various comments received in respect of the arts, culture and creative sector.
- The boundary of Belfast City was established under Local Government Reform. The LDP cannot expand the boundary to include hinterland areas that are under the responsibility of other councils. We do however recognise the interdependence and interaction with the LDPs of the surrounding council areas, and will continue to engage with neighbouring councils throughout the LDP preparation process.
- There will be opportunity for further engagement with the public and communities throughout the

consultation processes that will follow publication of the draft Plan Strategy and draft Local Polices Plan.

- We recognise the contribution of local independent and small business to the city and will aim to support local distinctiveness.
- We welcome the many suggested issues that have been identified in relation to our objectives. In light of these issues, we will consider making revisions to the objectives.
- The POP was produced with regard to regional policies, including the RDS 2035, published in March 2012. However, we will give consideration to having regard to a number of other strategies and policies identified by respondents.
- It is important to re-emphasise that the POP contains our preferred options for dealing with key issues in the plan area. The options and the alternative options considered in respect of these key issues have been demonstrated in the 'Sustainability Appraisal incorporating Strategic Environmental Assessment: Interim Report', published for public consultation alongside the POP.





# | How will we grow Belfast?

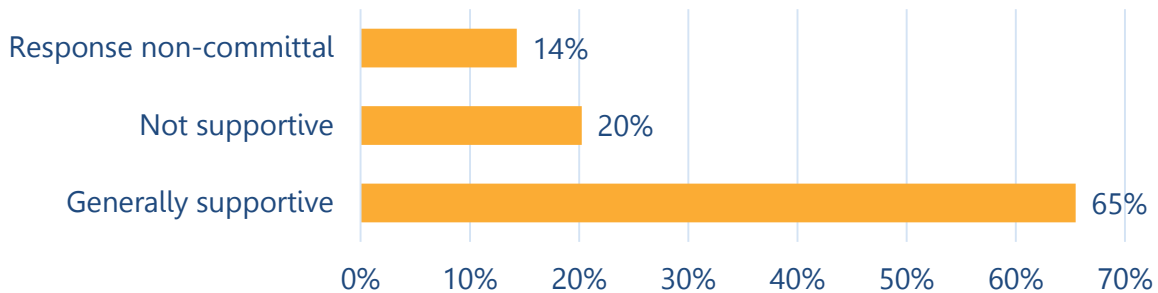


## 4.1 GR1 - Supporting economic growth

### We proposed

To grow Belfast by supporting a level of economic growth over the plan period that will allow the city to compete with similar sized UK cities and strengthen its position as the regional economic driver.

### You said



- Almost 65 per cent of respondents were generally supportive of our preferred growth option.
- There was broad recognition that Belfast needs to grow as the driver of the regional economy.
- The most frequent reasons cited for supporting the growth aspirations were:
  - the need for more housing;
  - the need to support investment in the economy;
  - improving access to employment opportunities; and
  - driving regeneration in the city.
- A number of the statements of support came with caveats, for example:
  - concerns over the ability of the infrastructure, such as transport and sewage, to cope with such a high level of growth; and
  - a question as to whether the level of development required can be delivered.
- A number of respondents raised questions around the growth sectors in the economy, the type of jobs to be created and how existing residents in some of the most deprived areas of Belfast would be able to access the new employment opportunities created.
- Statutory partners focussed on the fact that the preferred option exceeded the regional Housing Growth Indicators (HGIs) for the district and the implications that this may have for housing aspirations in other parts of the region.
- They also commented on the robustness of the evidence base required to justify such a departure from official growth projections.

“The HGIs are for guidance; they are not a cap or a target to be achieved. If the council proposes to exceed the HGI for their area, or falls short, there may be occasions when this is deemed acceptable if this can be justified given the particular circumstances of the individual council.” (DfI)



## How will we grow Belfast?

### Our response

- We welcome the strong support given to the preferred growth strategy.
- The growth of Belfast City is a key objective of the RDS and is necessary to help drive investment in the economy, create employment opportunities and support regeneration for all.
- We recognise that the proposed level of growth is ambitious, but believe that it is also realistic and deliverable.

“Housing Associations are among the largest developers in Northern Ireland and have an important role to play in meeting these housing aspirations.” (NIFHA)

- Phasing of land for development will ensure that delivery aligns with infrastructure investment.
- Research undertaken by Ulster University’s Economic Policy Centre, published alongside the POP, identifies the following growth sectors for the economy in relation to our preferred growth scenario:
  - administration services;
  - professional and scientific; and
  - information and communication.
- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring key employment locations are accessible by a range of transport options, including walking and cycling.
- The Belfast Agenda has identified ‘Working and Learning’ as one of the four key priorities for the city. This will complement the delivery of the LDP through the delivery of a range of programmes and services to improve skills, address barriers to employment and match skills to job opportunities.
- A robust evidence base is required to underpin all decisions in relation to the new LDP and is one of the key soundness tests that the LDP documents must pass before being adopted.
- In addition to the Housing Growth Options Report and Ulster University’s employment space requirements research, the Plan Strategy will be informed by a range of additional research, including:
  - **Urban Capacity Study** – to help identify an appropriate supply of both housing and employment land to accommodate the required development to realise growth.
  - **Housing Needs Assessment/Housing Market Analysis (HNA/HMA)** – to identify the right mix of housing tenures, including open market and specialist needs such as affordable housing, social housing, supported housing and traveller accommodation to be facilitated through the LDP.
- We welcome the recognition from DfI that the “HGIs are for guidance” rather than being “a cap or a target to be achieved”.
- We also welcome the recognition that there may be occasions where growth in excess of the published HGIs is deemed acceptable.
- The HGIs simply project forward existing trends and don’t take into account the potential impact of policy

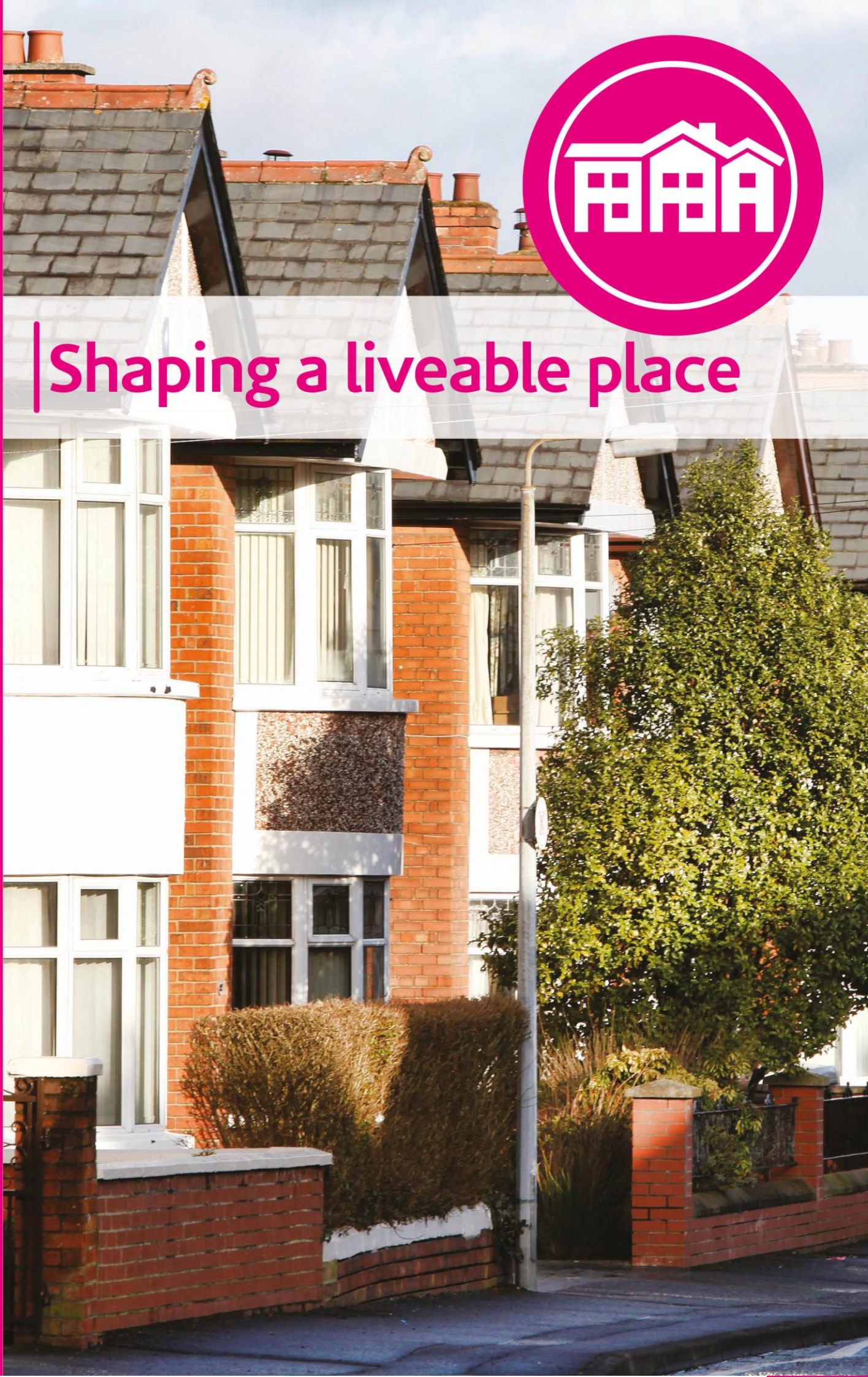


interventions, such as the RDS' aspiration to grow Belfast as the economic driver of the region. This

results in the HGIs projecting a growth level for Belfast that would seem at odds with the RDS aspirations.



# | Shaping a liveable place

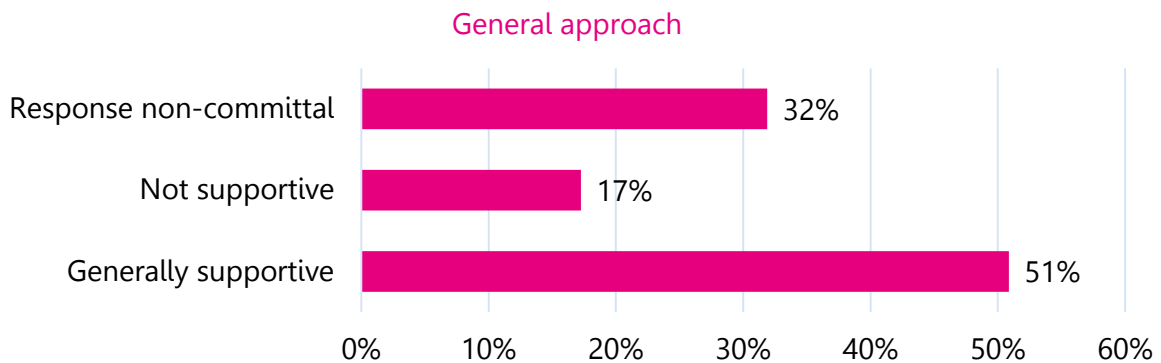


## 5.1 LP1 - Accommodating new homes

### We proposed

To allocate sufficient land to accommodate 37,000 new housing units, prioritising the reuse of vacant and derelict brownfield land and increasing the density of homes, particularly in the city centre and at other accessible locations.

### You said



- Just over half of respondents were generally supportive of this preferred option. However, a significant number (32 per cent) of responses were non-committal, indicating some uncertainty around the level of growth proposed and the ambitious goals of city centre living and high density development.
- There was general agreement that brownfield sites should be developed in advance of other sites in the city.
- While some advocated the 'city centre first' approach, others pointed to brownfield sites elsewhere in the city that may enable the provision of a more diverse mix of house types or which may support other objectives. It was noted that many socially deprived neighbourhoods are located outside the city centre, leading to suggestions that brownfield land in such areas should be promoted to assist in regeneration.
- In addition, it was suggested that areas which are within convenient walking distance of the city centre should also apply a higher density.
- A more flexible approach to brownfield redevelopment was inferred, with some suggesting a need to equally promote all previously



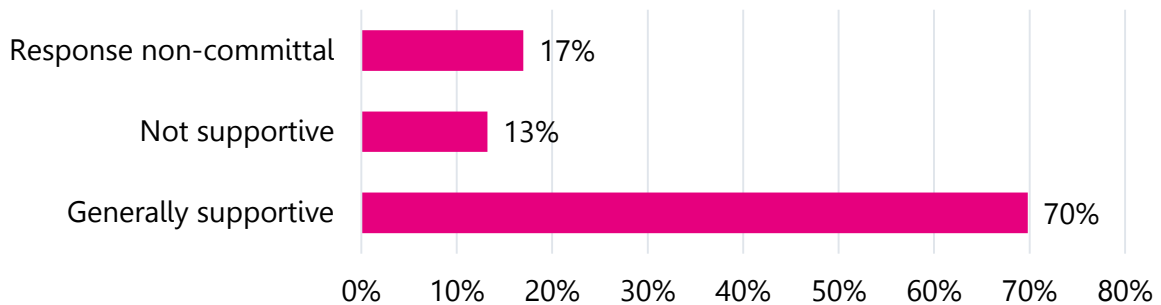


## Shaping a liveable place

developed brownfield land within the city, given the ambitious growth targets proposed.

- The city centre was recognised as an area which needs to accommodate new housing growth, providing multicultural, diverse city living in quality developments. A key point made by respondents was the need to ensure that residents have convenient access to services and amenities that cater for all ages and particularly for families.
- The poor visual quality of some parts of the city centre was noted, but also the opportunities presented to redevelop older buildings lying derelict.
- There was general support for increasing the density of development to help accommodate new growth, both in the city centre and at accessible locations. This would bring Belfast more in line with other denser cities such as Liverpool and Dublin.
- However, it was noted that a broad brush application of higher densities may not provide a suitable mix of housing, such as homes suitable for families.
- It was acknowledged that the quality of life standard within higher density schemes also needs to be carefully considered.

### Restricting new housing development in the countryside



- 70 per cent of the respondents who answered this question agreed that the LDP should restrict housing development in the countryside. There was a common understanding of the countryside as an asset that needs to be protected.
- With particular regard to the small settlement of Edenderry, there was a general opinion that its existing rural character should be preserved in the face of continuing development pressures.

### Our response

- We welcome the support for this preferred option, notwithstanding the concerns raised in relation to our proposed level of growth. We believe that this level of growth is both necessary and sustainable.
- The SPPS and supporting guidance outline a range of processes and evidence requirements to be considered when developing policies relating to housing in settlements, including:

- **The regional Housing Growth Indicators (HGIs)** – the HGIs formed the baseline for developing our range of growth options within the Housing Growth Options Report. However, they should be understood as indicators rather than targets.
- **RDS housing evaluation framework** – Used to establish the proposed Settlement Hierarchy for the district.
- **Allowance for existing housing commitments** – will be taken into account when setting housing targets within the Plan Strategy and when considering land allocations as part of the Local Policies Plan.
- **Urban Capacity Study** – Will help to identify an appropriate supply of both housing and employment land, including consideration of appropriate densities as outlined in LP1.
- **Allowance for windfall housing** – we will make allowance for housing development on non-zoned land through analysis of historic housing monitor data.
- **Application of a sequential approach** – Policy LP1 seeks to apply the sequential approach within the Belfast context.
- **Housing Needs Assessment/ Housing Market Analysis**– We are currently liaising with Northern Ireland Housing Executive (NIHE) regarding the completion of a HNA/HMA, to inform identify the need for different types, size and tenures of housing units.
- There are cross-boundary implications arising from the effective housing market area, which will be addressed through liaison with NIHE and neighbouring authorities.
- Regional policy requires that priority is given to land within the existing urban footprint, as opposed to new greenfield development. Belfast is a compact city with a finite land resource, so the use of higher densities and the reuse of derelict sites and buildings is essential to deliver an accelerated pace of growth.
- A focus on city centre living is also necessary to generate the critical mass of population needed to sustain high quality services and amenities, to make better use of existing building stock, and to provide suitable and appropriate housing to enable people to live closer to their place of work.
- We welcome the general agreement from respondents that new housing development needs to be restricted in the countryside. The rural setting of Belfast and the small settlements which surround it will arguably gain even greater importance as the urban footprint continues to be consolidated and higher density development prevails.

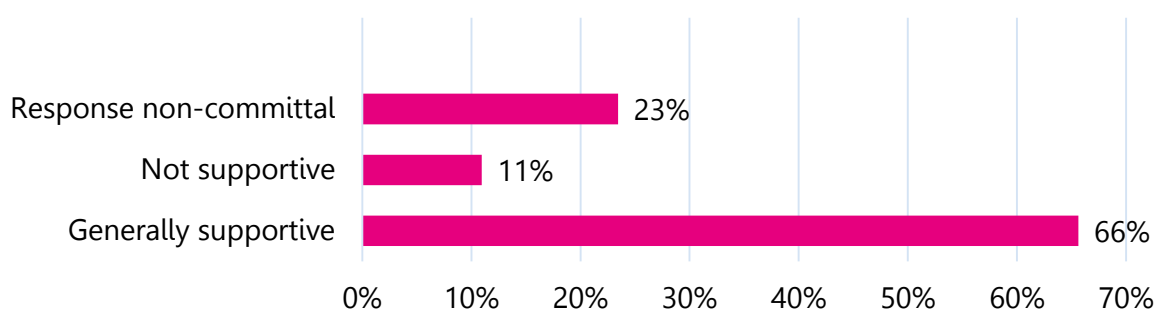


## 5.2 LP2 - Social and affordable homes

### We proposed

To require a percentage of all new homes in larger developments to be affordable.

### You said



- Two thirds of respondents were generally supportive of the option to require a percentage of all new homes in larger developments to be affordable.
- The key themes related to:
  - the definition of affordable;
  - the proportion of affordable homes within a scheme;
  - viability;
  - housing supply; and
  - impact on a community.
- A number of respondents queried the definition of 'affordable housing'. NIHE stated:

"Whilst we acknowledge this is the definition as outlined in the RDS, we would like to see the POP adopt the definition contained in the SPPS, which states that affordable housing is social rented housing and intermediate housing." (NIHE)



NIHE also suggested that private rental accommodation where housing benefit is paid should not be included as affordable housing, nor should low cost owner occupied housing purchased with 30 per cent or less gross household income.

- The NIFHA commented that the definition needed clarification, noting that the Department for Communities (DfC) was currently reviewing the

definition to establish an agreed meaning across government. They suggested that it would be beneficial if, when agreed, this definition would be used in the final LDP.

- Some comments referred to other regulatory mechanisms within existing housing markets, which continue to promote social/affordable housing.
- These included the private-rental sector, social housing right-to-buy and intermediate housing co-ownership.
- Issues surrounding viability, proportion of affordable housing and type of provision were also considered by respondents.
- Some respondents raised concerns about affordable housing being

“...a robust policy expectation for on-site delivery was vital for a developer contribution policy to be effective. Off-site provision and commuted sums should only be accepted in exceptional circumstances and in cases where doing so will contribute significantly more to affordable housing supply than could be achieved through onsite delivery” (NIFHA)

‘pepper-potted’ throughout schemes as potentially distorting the housing market, raising viability issues and creating community tensions.

### Our response

- We welcome the support for this preferred option. Such a policy will support the SPPS policy aim to facilitate an adequate and available supply of quality housing to meet the needs of everyone. Affordable housing will form an important element of the overall growth strategy proposed.
- The comments made in relation to the definition of ‘affordable housing’ are noted. We will carry out further detailed research and discuss this issue with the relevant partners as the plan-making process progresses. It is clear that the differing definitions between the SPPS and RDS need regularised to provide clarity on what affordable housing is.
- While the NIHE comments in relation to the private rental sector being excluded from the affordable housing definition are noted, a number of other respondents referenced increasing unaffordability in the private rented sector as rent levels continue to rise.
- The comments in relation to development threshold, proportions, viability and type of affordable provision (units, land, commuted sums) are all noted. The specific details of how any affordable housing policy will be applied will be developed following further research, including the completion of a HNA.

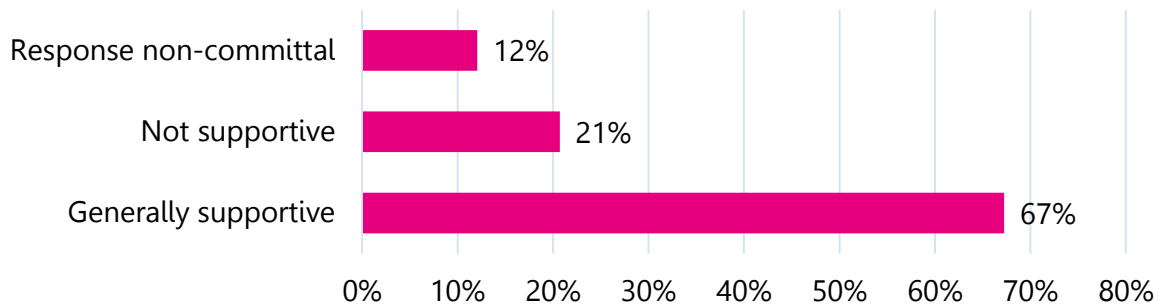


### 5.3 LP3 - Ensuring an appropriate mix of housing

#### We proposed

Policies to support a mix of housing types, sizes and tenures being delivered over the plan period to meet the needs of the projected population, including a requirement to help deliver mixed and balanced communities.

#### You said



- The majority of respondents supported our proposed approach to ensuring an appropriate mix of housing (67 per cent).
- There was broad recognition that an appropriate mix of housing units could help foster balanced communities, provide housing choice, benefit health and wellbeing, reduce social exclusion and help tackle area based deprivation.
- Other reasons cited for support included responding to demographic changes such as an ageing population, the need for smaller household sizes and responding to changes to Housing Benefit and Local Housing Allowance.
- Some respondents recognised that appropriate mixes could assist with increasing densities to grow the city population and there were suggestions that the policy could rebalance areas of the city where there is currently a concentration of certain housing types.
- A number of respondents highlighted the importance of ensuring a suitable supply of alternative housing types such as co-housing, inter-generational homes/home-share and traveller accommodation.
- A number of comments received via social media encouraged appropriate accommodation to meet the needs of the homeless community.
- There was a general recognition of the importance of the private rented sector in contributing to housing supply and that there is both a growing desire, and need, to rent long term. However, concerns were raised

"The Housing Executive supports LP3 ensuring an appropriate mix of housing. We believe this is important to facilitate mixed and sustainable communities." (NIHE)



around affordability, design quality and management.

- Future regulation of short-term holiday lets was also raised.
- A number of statements of support came with caveats, for example, highlighting the role of supporting facilities and the overall liveability of an area, whilst others requested more detail.
- Viability and deliverability issues were

raised as concerns and some respondents suggested that flexibility was required to respond to market conditions and site specific characteristics and conditions. There were conflicting opinions on the merits of housing mix requirements on key sites and larger schemes and most respondents sought more details.

#### Our response

- We welcome the strong support received in relation to this preferred option.
- Such a policy on housing mix aligns with guidance on achieving balanced communities set out in the SPPS.
- The various types of housing accommodation proposed by respondents is noted. Detailed research will be completed to identify the appropriate mix of housing to be facilitated through the LDP, including a HNA/HMA.
- We recognise that the Private Rental Sector (PRS) plays an important role in meeting housing need and will ensure that concerns regarding affordability of rents and management issues are considered within the LDP.
- Issues around flexibility, viability and deliverability are all noted. The POP sought to gauge opinion on the principle of such a policy approach. The specific details will be explored at length before being written into the draft Plan Strategy.

## 5.4 LP4 - Specialist accommodation for older people

### We proposed

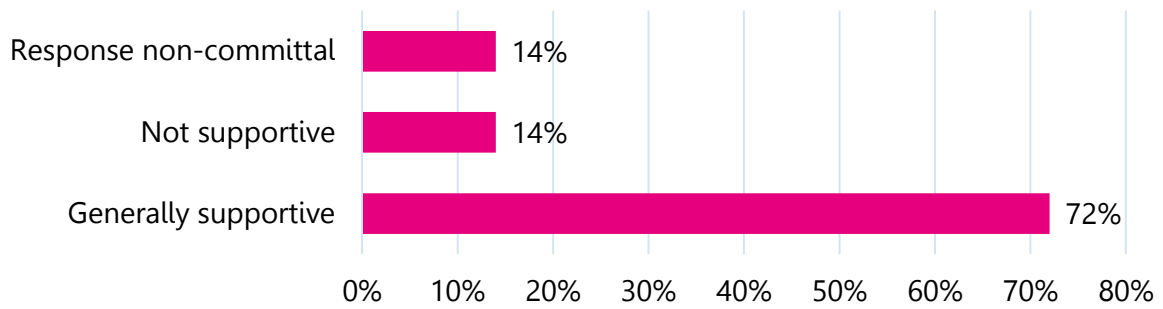
To set locational criteria to ensure specialist housing for older people maximises access to supporting facilities and services. A requirement for a proportion of new homes on strategic housing sites to be built to Lifetime Homes standards.



## Shaping a liveable place

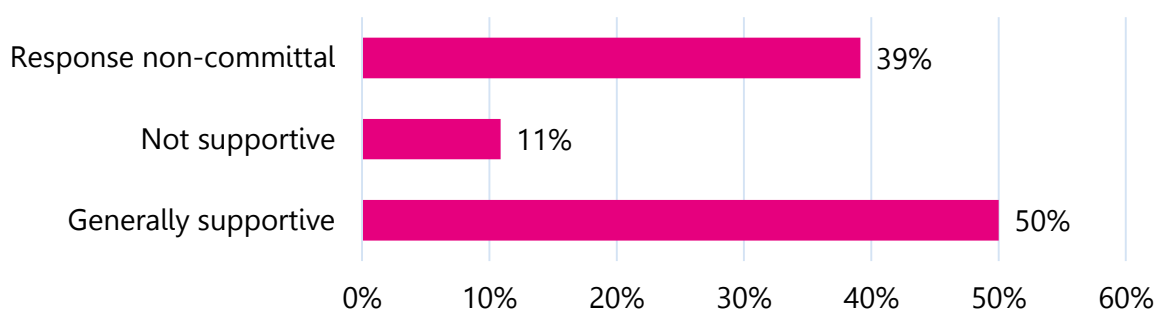
### You said

#### General approach to specialist housing for older people



- The majority of respondents supported our proposed approach to homes for older people (72 per cent). There was less support for the proposed approach to Lifetime Homes (50 per cent).
- Proposed location criteria was generally welcomed and the majority of respondents recognised the need to ensure accommodation for older people is integrated into existing communities and has good accessibility to local facilities and services. Active lifestyles, sustainable transport and social inclusion were highlighted as benefits of appropriate criteria.
- There were differing opinions expressed on the suitability of peripheral locations; generally focussing on issues of isolation and inclusion.
- Some respondents caveated their support by cautioning against policy that was too prescriptive or lacked flexibility.
- Suggested criteria included accessibility, brownfield, provision of green space, local amenities, parking and planning history.
- Specific accommodation types were highlighted by various respondents, including; specialist dementia accommodation, bungalows and supported housing. Some respondents emphasised the benefits of associated care and support services alongside supported housing.
- Some respondents said the proposed approach was too restrictive and that the policy should cater for all with specialist needs, not just older people.

#### Lifetime Homes



- Although 50 per cent of respondents were generally supportive of our proposed approach to Lifetime Homes standards, nearly 40 per cent were non-committal. Comments received indicate that this is because respondents required more detail on the proposal.
- Some respondents suggested flexibility in application of the Lifetime Homes standard and questioned the impact on viability and deliverability.
- A number of respondents advocated that Lifetime Homes standards should be applied to all new housing, across tenures.
- Other respondents consider that in many cases Lifetime Homes cannot be adapted to meet all specialist needs. In this regard they do not wish to see prescriptive requirements.
- Some respondents said that the location of Lifetime Home standard developments must be carefully considered and may not be appropriate in all areas.
- It was also suggested that where a standard becomes the minimum requirement, it can often become a design target for quality, and not a starting point.
- The point was also made that many of the more relevant Lifetime Homes standards are already addressed by the building regulations.

### Our response

- We welcome the strong support received in relation to the proposed approach to specialist housing for older people, notwithstanding the issues raised in relation to criteria, flexibility and locations.
- Detailed research is currently being completed and further discussions with key stakeholders will continue to further explore the issues raised in relation to specialist accommodation for older people to inform the Plan Strategy.
- The specific types of housing accommodation proposed by respondents is noted.
- The significant proportion of non-committal responses to the issue of Lifetime Homes and the comments received in relation to flexibility, viability and deliverability are all noted. The POP sought to gauge opinion on the principle of such a policy approach; the specific details will be researched before drafting the Plan Strategy.

## 5.5 LP5 - Traveller accommodation

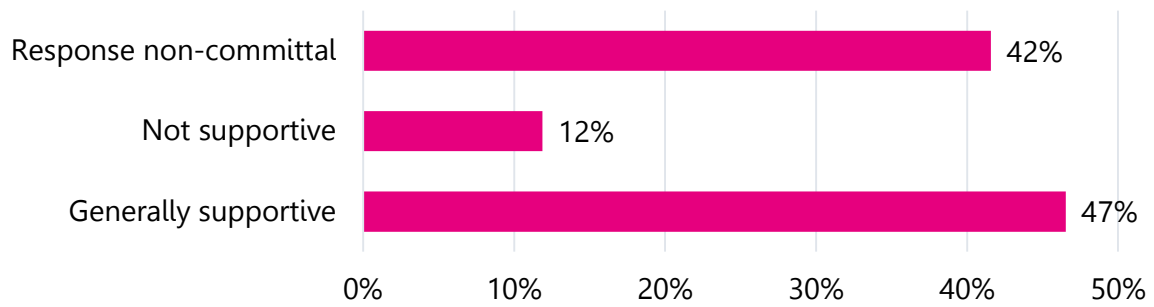
### We proposed

To protect existing traveller facilities and provide a criteria-based policy for assessing future proposals for the provision of suitable facilities.



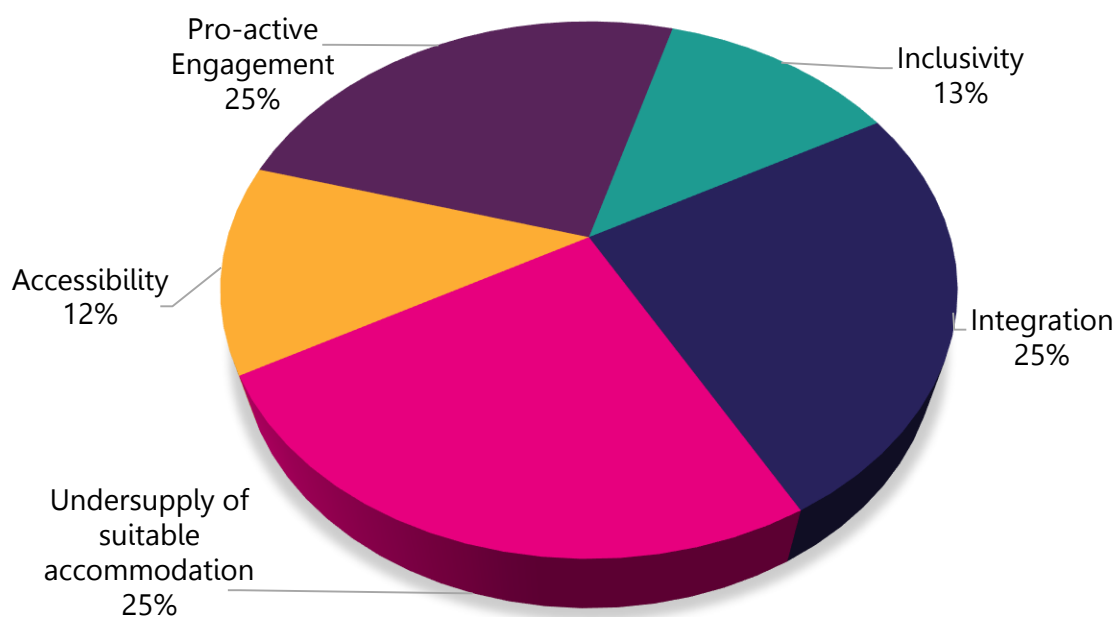
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### You said



- Nearly half (47 per cent) of respondents were generally supportive of the proposal to protect existing traveller facilities and provide a criteria-based policy for assessing future proposals.
- Statutory partners, including DfI, the NIHE and the Equality Commission NI, were generally in support of the proposed approach.
- However, it is notable that 42 per cent of respondents were non-committal.
- The key issues raised by respondents centred on the need for pro-active engagement with the traveller community, accessibility to services, under-supply of accommodation and inclusivity and integration.
- The provision of an appropriate level of ethnically suitable accommodation – Transit, Permanent, Co-operated site and Group Housing – was seen as vital.
- However, other respondents suggested that dealing with travellers as a separate housing need in the Plan could be detrimental to the traveller community and that the plan should be inclusive and not exclusive to any one section of society.

### Traveller accommodation key issues



**Our response**

- We welcome the support received for the policy approach, particularly from statutory partners.
- The relatively high proportion of respondents who were non-committal may suggest a lack of understanding among the public at large of the key issues which affect travellers.
- We acknowledge the key issues raised and would concur that proper integration of travellers at sites which fully meet their needs and where services and amenities are available is of paramount importance.

“The Commission continues to advocate the need for an adequate programme of accommodation to meet the needs of the Irish Traveller Community and remains concerned by the lack of progress in securing planning permission for sites in the areas identified as most need in the NIHE (2015) Traveller Accommodation Needs Assessment” (Equality Commission NI)

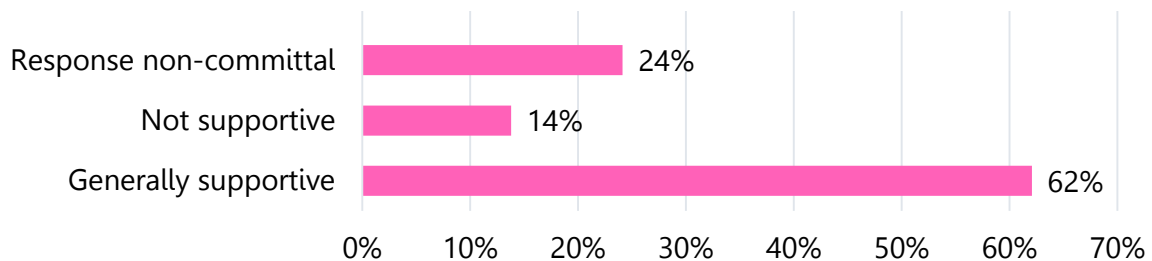
- Regarding the concerns about traveller issues being dealt with as a separate section, the SPPS requires specific consideration given that “travellers have distinctive needs” as a group, which require specific housing solutions. The specific need will be identified through the HNA.

**5.6 LP6 - Shared housing provision**

**We proposed**

To manage shared housing provision to maintain balanced communities, focussing on the future supply of Houses in Multiple Occupation (HMOs), flats or apartments and Purpose Built Managed Student Accommodation (PBMSA).

**You said**



- The majority of respondents supported our proposed approach to managing the future supply of shared housing (62 per cent). Almost a quarter of responses commented on the issues but neither supported nor objected to the proposals.
- Many respondents cited a range of social impacts of HMOs as justification for their support, including anti-social



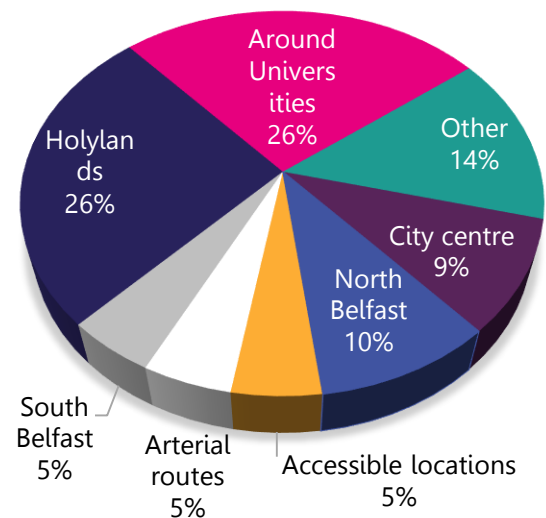
## Shaping a liveable place

behaviour, traffic and parking, proliferation of to-let signs and lack of care from 'transient' residents.

- Most respondents agreed that we should seek to manage both HMOs and flats/apartments, although a small number suggested we should only target HMOs.
- There was strong recognition that the effective management of student accommodation is needed in future and strong support for the provision of PBMSA.
- Though our in-depth discussions with local residents' groups from the Holyland area, there is a perception that HMOs are not being accurately captured in baseline evidence, such as the NIHE's HMO Register. There was a suggestion that landlords are converting properties without the necessary approvals and registration.
- When asked which areas should be targeted in relation to managing concentrations of shared housing, over a quarter (26 per cent) said the Holyland area and a further 26 per cent said areas near to the universities. Other locations such as the city centre and North Belfast are also likely to be linked to the expansion of Ulster University's campus in the north of the city centre.

- A significant number of respondents highlighted that HMOs and shared forms of housing are not only occupied by students, but serve an important part of the affordable housing supply for migrants, asylum seekers and young professionals.
- In relation to this, there were also broader issues raised around the role and management of the PRS as a whole. Concerns were raised regarding the quality of some existing rented properties and the affordability of rents in some areas.
- The Equality Commission NI noted welfare reforms may place more reliance on the PRS and shared forms of housing in future

Locations to actively manage concentrations of shared housing



### Our response

- We welcome the strong support received in relation to this preferred option and note the range of social issues that arise when communities are imbalanced in terms of housing type, tenure or size.
- We also recognise that many of the problems currently being experienced

in communities where there exist high concentrations of HMOs relate to the behaviour of individual residents and not all tenants in HMOs are responsible for difficulties.

- We recognise that the effective management of shared housing can significantly reduce many of the

negative impacts, but note that this often falls within other statutory functions, such as landlord registration, HMO registration/licensing and environmental health.

- The promotion of PBMSA as an alternative to un-managed private HMOs recognises that this form of accommodation for students is better able to deliver effective management.
- Some issues are associated with the physical fabric of an area, such as changes in the character of an area, the layout of a locality and its ability to cope with traffic and parking arrangements. The LDP can play a role in addressing such environmental considerations.
- We acknowledge that a robust, evidence-based approach will be required to identify areas with existing concentrations of shared forms of housing and are currently developing additional evidence to help inform future decisions. However, it is clear that the evidence can sometimes differ from perceptions of those most

acutely affected by the problems that can arise. The suggestions of areas to be targeted therefore provide a valuable indication of locations to consider when developing future policies.

"HMOs are an essential part of how society has developed, however not all people will be suited to this type of living."  
(Community interest group)

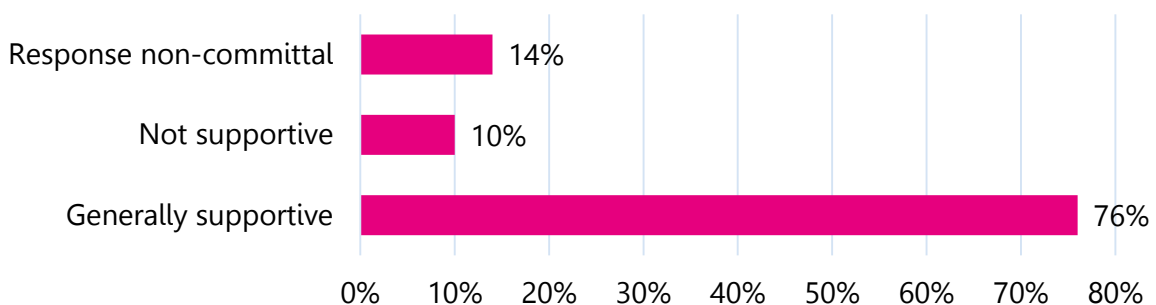
- We recognise that shared housing and HMOs make a valuable contribution to meeting housing needs and wish to facilitate this form of housing in a balanced way across the city. The problems occur where concentrations lead to an imbalance in a local population.
- We recognise that the PRS plays an important role in meeting housing need and will ensure that concerns regarding affordability of rents are also addressed within the LDP.

## 5.7 LP7 - Quality design in residential development

### We proposed

A single criteria based policy to ensure quality in all residential development.

### You said





## Shaping a liveable place

- The majority of respondents supported our proposed approach to ensure quality design in residential developments (76 per cent).

"...high quality residential development will be an important element in attracting people to live in Belfast, and can help achieve the aim to grow the population of Belfast." (NIHE)

- A number of respondents caveated their support for a criteria-based approach and cautioned against an overly prescriptive set of criteria. Respondents suggested flexibility to respond to market conditions, allow for site-specific conditions and to encourage creativity and innovation.
- Respondents welcomed the prospect of clear guidance and certainty for applicants although some highlighted the need to have regard to commercial viability. A City Architect or Urban Design Department were proposed to provide better advice.
- Respondents were largely supportive of minimum housing space standards and some provided additional suggestions such as use of balconies.
- While some respondents proposed enhanced standards for access to open space, citing benefits for sustainable communities and enhancing health and wellbeing, other respondents suggested greater flexibility. For example, parts of the city suggested where amenity space provision could be relaxed included areas in close proximity to existing, quality open space and sites on arterial routes or in the city centre.
- Relaxed parking standards in highly accessible areas was suggested by a number of respondents and some flexibility for social housing schemes due to lower levels of car ownership.
- Use of Design and Access Statements and Landscape Plans were encouraged for new residential developments.
- The benefits of biodiversity on quality of place was highlighted and it was suggested that further emphasis should be placed on how good residential design can protect and enhance biodiversity and encourage wildlife.
- Some respondents encouraged arts and culture to be considered as part of quality design and 'placemaking', including public art provision.
- Design for intergenerational living and specific criteria to encourage child friendly developments was suggested, including use of Lifetime Homes standards.
- Respondents also highlighted a number of specific issues to consider, including:
  - airport noise contours;
  - broadband connectivity;
  - climate change, energy efficiency, flood risk and SuDs;
  - crime and security. Secure by design standards were suggested;
  - encouraging biodiversity and use of green roofs;
  - home maintenance and refuse collections;
  - links to public transport, walking and cycling infrastructure;
  - risk of overshadowing;
  - use of sound; and
  - wildlife friendly lighting.



**Our response**

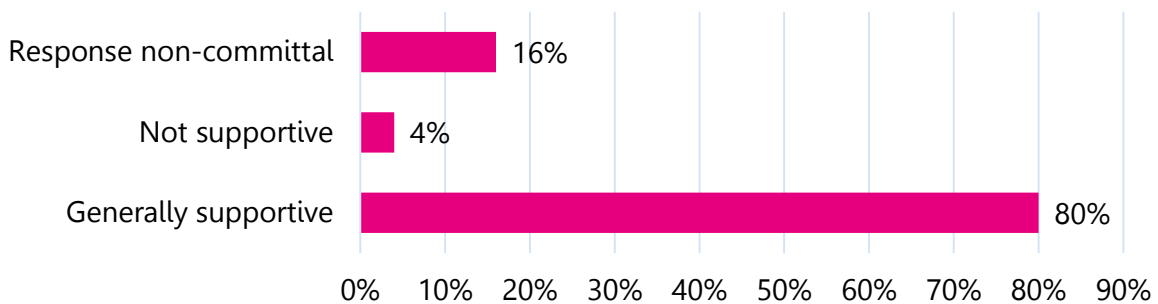
- We welcome the strong support for ensuring quality design in residential developments.
- The issues raised in relation to flexibility of proposed criteria and viability are noted. We acknowledge that the criteria-based approach should find an appropriate balance and the specific details will be explored at length before greater detail is provided within the Plan Strategy.
- We acknowledge the suggested issues to consider in relation to residential design. These will be carefully considered in discussion with key stakeholders to inform the Plan Strategy.

**5.8 LP8 - Promotion of health and wellbeing**

**We proposed**

To include strategic policies to ensure that all new developments maximise opportunities to promote healthy and active lifestyles. This will include supporting active travel options, improving accessibility to local service centres, adequate provision of public open space, leisure and recreation facilities and managing the provision of restaurants, cafes and hot food bars.

**You said**



- The vast majority of respondents to this particular preferred option supported our proposed approach to the promotion of health and wellbeing in the LDP.
- Overall, of those expressing an opinion, 80 per cent of respondents agreed with the proposed approach, whereas 4 per cent disagreed.
- There was a general acknowledgement that the LDP should seek to create sustainable, balanced and more self-sufficient neighbourhoods as these are fundamental to better health and wellbeing. In this regard, some respondents commented that the focus must be across all city neighbourhoods and should not concentrate unduly on the city centre.
- A frequent issue raised was the need for better accessibility for all of the population to amenities, facilities and services. This included reference to child-friendly and age-friendly places.



## Shaping a liveable place

- There was particular reference to the need for more and better green and open spaces, with better access for all and greater connectivity. This included general support for a green network of connected and accessible open spaces.
- A number of respondents commented that the LDP should also recognise the

importance of culture and arts to health and wellbeing. In addition, the benefits of the city's built and historic environment were raised.

- Where the respondent indicated a reason for not supporting our proposed approach, this related to the specific need to provide more and better cycle lanes across the city.

### Our response

- We welcome the strong support given to the preferred option for promoting health and wellbeing.
- We agree that the LDP should help to create more sustainable neighbourhoods across the city by seeking to focus new investment and development at appropriate locations. While the city centre is an important focus for the entire city and is key to the success of Belfast as the regional economic driver, it is important that all neighbourhoods benefit from new investment and development. The LDP will include policies that help to sustain and improve neighbourhoods in all parts of the city.
- The particular responses in support of more and better green and open spaces are noted and we acknowledge the clear linkages between access to open space and health and wellbeing. While specific matters relating to green and open spaces are included in the 'green and active' theme of the POP, the multiple benefits of accessible quality open space are recognised.

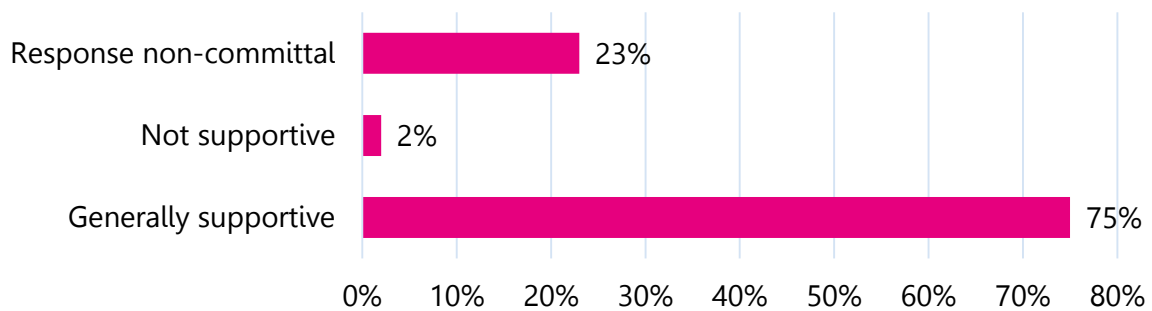
- The LDP will seek to protect green and open spaces and ensure that new development makes appropriate provision or contribution to new or improved facilities. The LDP will also incorporate proposals for an integrated 'green and blue infrastructure network' that includes connected green and open spaces.
- We also note the support for improved accessibility for all to services and facilities, particularly by sustainable travel modes. We also acknowledge the important health and wellbeing benefits of active travel. Specific matters relating to travel and transport are included in the 'smart, connected resilient place' theme of the POP and the responses indicate a strong endorsement of our proposed approach. The LDP will include policies that seek to ensure that new development is at an appropriate location and is accessible to all by a range of travel modes. In addition, through the green and blue infrastructure network, we will seek to improve accessibility and connectivity across the city.

## 5.9 LP9 - Community infrastructure

### We proposed

To protect and provide development opportunities for community, health, leisure, nurseries and educational facilities based on local need in line with the projected population growth over the plan period to 2035. Where appropriate, new developments should be required to contribute towards any new community infrastructure requirements arising as a result of development and should ensure good accessibility to existing services and facilities intended to serve future residents.

### You said



- The vast majority of respondents to this particular question supported the proposed approach to seek developer contributions towards community infrastructure.
- 57 respondents answered this question and 38 respondents also provided additional comments on this matter. Overall, of those expressing an opinion, 75 per cent of respondents agreed with the proposal, whereas 2 per cent disagreed.
- Some respondents stated that the contribution funds should be used to improve a variety of issues in addition to community facilities. These included arts and culture, open space, natural environment and affordable housing.
- A number of responses noted that, while financial contributions may be beneficial to the wider community, these should not prejudice the viability of the proposed development and the overall process should be fair and transparent.
- The respondent that indicated no support for the proposed approach stated that development should not be hindered by a requirement for contributions.

### Our response

- We welcome the strong support given to the preferred option for seeking contributions towards any new community infrastructure requirements arising as a result of development, including good accessibility to existing services and facilities.



## Shaping a liveable place

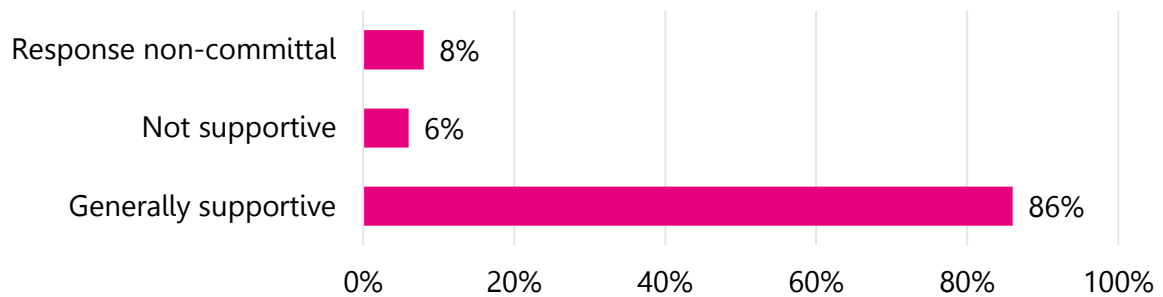
- We acknowledge that measures to collect and spend developer contributions must be fair and transparent. In addition, we also recognise that contributions must take account of the nature, scale and location of the development and its financial viability.

## 5.10 LP10 - Community cohesion

### We proposed

To encourage all new developments to promote community cohesion and improve community relations.

### You said



- The majority (8 per cent) of respondents were generally supportive of our approach to addressing community cohesion. However, of these, 54 per cent suggested that there was more the LDP could be doing to improve community relations.

Plan will fail to facilitate Belfast  
 Collaboration / building trust between stakeholders  
 Shared Urban Narrative  
 intergenerational  
 Addressing divisions & residential segregation  
 local services Socio-economic issues & Regeneration  
 Child Friendly Digital divide  
 Co-ownership bonfire sites Funding  
 Integrated education Well designed  
 Low skilled employment Mix of Uses  
 Green spaces Legacy issues Heritage Celebrate diversity

# Involve communities

Culture & arts connectivity  
 Place Making Mixed tenure Tenure blind  
 defensive architecture/design community centres  
 Social housing need Inner city  
 Public policy support  
 Broader understanding of geography of interface areas  
 Consideration of sound in shared spaces  
 Removing physical barriers won't erase social differences

- It was suggested that the need to address community relations is very unique to the Northern Ireland and Belfast context and a number of respondents suggested there should be a specific objective relating to promoting good relations.
- A consultation workshop undertaken with our Shared City Strategic Partnership also concluded that the LDP needs to be more explicit in relation to good relations, perhaps including as a cross-cutting theme or with Belfast’s uniqueness being reflected in the overarching vision.

"We recommend therefore that the LDP should include a specific objective on improving community/good relations..."  
(Equality Commission NI)

- ‘pepper potting’ social/affordable housing throughout developments;
- connectivity and the need for better integration of neighbourhoods throughout the city;
- provision of open space and shared/neutral space; and
- the need for well-designed buildings and spaces and a ‘place making’ approach.

"A spatial approach to community cohesion will only succeed if it's supported by solid social and economic development on the ground..."  
(Interest group)

- The need to involve local communities in any development at interfaces was by far the most significant response, with over 22 per cent of respondents referring to this in some form.
- Suggestions for what the LDP could do to better promote good relations also highlighted the cross-cutting nature of community relations issues, with many referring to other LDP preferred options, such as:
  - mixed tenure and ‘tenure blind’ development;

- A range of wider public policy interventions were also suggested, such as integrated education, management of bonfires and community development.
- A number of respondents suggested that the LDP should do more to tackle problems in existing social housing estates, the majority of which are single identity.
- Issues relating to bonfires were also frequently highlighted, with a number of comments suggesting bonfire sites should be developed, rather than retained as open space, to prevent problems in the future.

**Our response**

- We welcome the strong support given to this preferred option, but recognise that it is complex topic that will

require a range of interventions to address.



## Shaping a liveable place

"The Department recognises that this is a significant challenge given the spatial legacy of conflict in the City...The council is to be commended for its flexible approach to this difficult matter." (DfI)

- Such a high level of support shows that the fact that we are seeking to address these issues within the LDP is very welcome, whilst the high volume of suggested ways to do this highlights the complexity of the issues.
- While the LDP can aim to address the spatial legacy of conflict and promote community cohesion, it should be

recognised that it is only one element of the multi-faceted approach needed to address good relations as a whole.

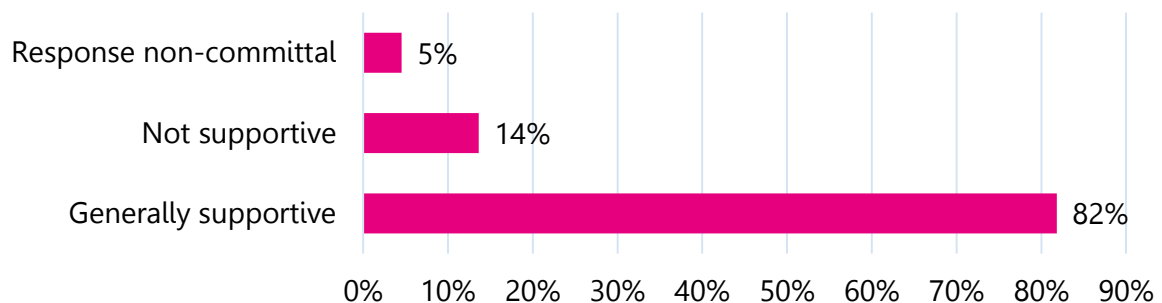
- We acknowledge that Belfast faces significant challenges with community cohesion and that the planning solutions cut across a range of policy areas.
- We will therefore consider whether revisions are needed to the vision, aims or objectives to better reflect this, or whether the community cohesion could be articulated as a cross-cutting theme – an approach followed throughout the SPPS.
- While there is a limit to the impact the LDP can have on existing housing stock, development at interface locations should have a significant impact on existing residents.

### 5.11 LP11 - Urban design

#### We proposed

That applications will be required to demonstrate how their design supports the creation of an attractive environment in Belfast, with development proposals needing to demonstrate that they have regard for a number of criteria.

#### You said



- A total of 82 per cent of respondents were generally supportive of our urban design approach.
- There was a general reference to the importance that should be placed on our heritage and that a robust

approach to urban design criteria was required to ensure that Belfast's unique characteristics were given due regard above commercial interests.

- A common theme that emerged is that the urban design policy approach marked a positive step in the way of 'placemaking' and the examination of a places form and function and the relationship between buildings and spaces as opposed to looking at buildings in isolation.
- Emphasis has also been placed on the importance of active street frontages as outlined within our approach given their importance as spaces of everyday life and social interaction.
- A number of comments responded positively to the approach in its promotion of permeable and legible urban environments. However, points were regularly raised in relation to the sterile and blighted lands around the

inner ring roads and the need for direction on how to deal with these barriers and vacant spaces.

- While supporting our approach, a number of respondents raised concerns in relation to the amount of recent demolition of historic buildings within the city centre and the knock on effect this has on displacement of local businesses.
- Where responses included reasons for not supporting our proposed approach, these stated that if not managed accordingly, such criteria could result in overly restrictive and prescriptive parameters that may stifle imaginative design and enhancement of the built environment.
- Reference was also made to the need for greater flexibility regarding listed buildings in Belfast and the relaxation of current legislation.

### Our response

- We welcome the strong support given to the urban design preferred option.
- We agree that the LDP should promote key elements such as active frontages, high quality public realm and an approach that puts people and place first before buildings.
- Of particular importance is the value that should be placed on some non-listed historic buildings which contribute to local distinctiveness.
- We acknowledge that the urban design policy approach should find an appropriate balance in its criteria in providing officers and applicants with valuable parameters based on good practice, while not being overly

"It is widely recognised that well designed buildings and successful places can have a positive impact on how people feel. The way in which places and buildings are configured, patterns of movement in the space around us and the level of access to quality open space are all factors that make us feel good." (SPPS)

prescriptive as to stifle creative design.

- Those responses that reference good 'placemaking' as a key component to this policy have been duly noted.



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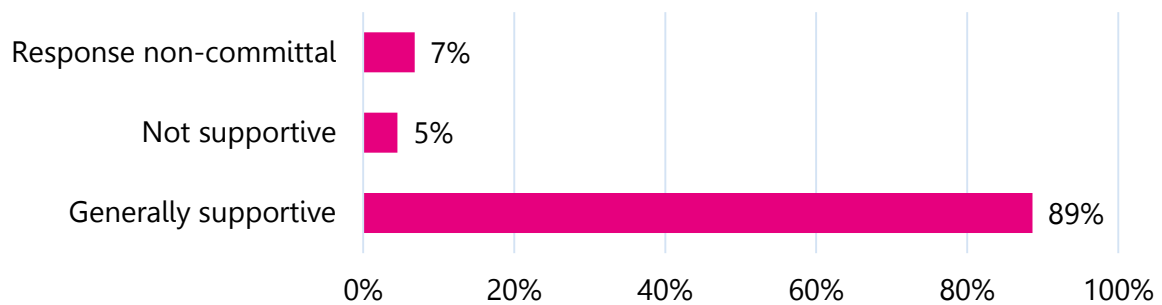
- We agree that emphasis needs to be placed on those vacant sites located around the inner ring roads in order to mitigate their restriction to movement and the role they can play in restitching the urban environment in a positive way.
- We will consider suggestions for the development of design teams for particular areas within the city and the building up of design skill sets within the council.

## 5.12 LP12 - Arterial routes and gateways design

### We proposed

To provide policy which supports quality design vitality and function of arterial routes and key city centre gateways, accompanied by Supplementary Planning Guidance to guide development proposals for the arterial routes of the city and key gateway or arrival corridors.

### You said



- There were 44 responses. Overall, of those expressing an opinion, 89 per cent of respondents were generally supportive of the proposal and 5 per cent were not supportive.
- A lot of emphasis within responses was placed on the design quality of arterial routes and the need to improve their overall look. Here suggested approaches included the planting of trees along main routes, quality street furniture and landscaping proposals which could create a better sense of arrival.
- Some responses highlighted the unattractive nature of a number of these connectors when compared to other cities and the bad impression this can give. In this regard responses suggested that the design quality of arterial routes, gateways and arrival corridors should be treated as a priority.
- The issue of traffic has been raised under this theme particularly in relation to the impact of bus lanes at peak times. A number of respondents view these bus priority measures as having had a negative impact along arterial routes, causing additional congestion and hampering instead of easing traffic.
- The aspiration is that policy could assist in helping to promote and



protect the character of existing local centres and create vibrant neighbourhoods that people want to live in.

- Some comments have suggested that any policy should be flexible enough to encourage regeneration and development along arterial routes.
- Respondents suggested that due regard must also be had to the biodiversity value of these areas, with Royal Society for Protection of Birds (RSPB) NI highlighting the crucial role that green and blue infrastructure can play in supporting healthy communities, particularly along river corridors.
- Where responses incorporated reasons for not supporting our proposed approach, these included:
  - that the preferred option has not examined the integral issues of transport and accessibility; and
  - that the promotion of 'strong neighbourhood centres' can have

adverse effects on community relations if they are made inaccessible to other communities.

- In relation to which arterial routes, key gateways or arrival corridors that need most attention, responses included the following locations;
  - North - Clifton Street, York Street, Antrim Road, Crumlin Road, Cliftonpark Avenue, Ligoniel Road;
  - West – Westlink, Millfield/Lower Falls/Shankill;
  - East – Sydenham Bypass/Dee Street, Castlereagh Road, Cregagh Road, Lower Newtownards Road, East Belfast shatterzone, Albertbridge Road;
  - South – Donegall Road, Donegall Pass, Donegall Avenue, Ormeau Road, Lisburn Road, Queens Corridor (QUB to city centre) and;
  - City centre - College Square, Great Victoria Street, Cromac Street.

### Our response

- We welcome the strong support given to the arterial routes and gateway design preferred option.
- We acknowledge that promoting design quality along these key routes and gateways presents a major opportunity to introduce and implement good practice street centred urban design principles.
- These principles can help to strengthen liveability and connectivity along these routes by allotting priority to walkable, safe and welcoming environments while addressing the issue of fragmented urban form.
- However, as these routes also act as key points of arrival to the city for those that live, work and visit there, it is also critical that an appropriate balance is struck between supporting the quality of life and sense of place for communities who live along these routes whilst supporting their important and strategic role as transport corridors.
- Specific issues such as "amending bus lanes so that they are orderly" and "continuous and not stop-start" fall under the responsibility of DfI. Nevertheless, as a significant number of people still commute to Belfast



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along these routes from surrounding settlements, policies within the LDP need to ensure that transport demands do not overshadow principles of successful 'placemaking' and the promotion of softer modes of transport such as walking and cycling. The promotion of vibrant and lively streets as opposed to thoroughfares.

- We have recently commissioned a green and blue infrastructure plan as

part of an overarching Open Space Strategy for the city. This piece of work will take into consideration those biodiversity issues raised by respondents.

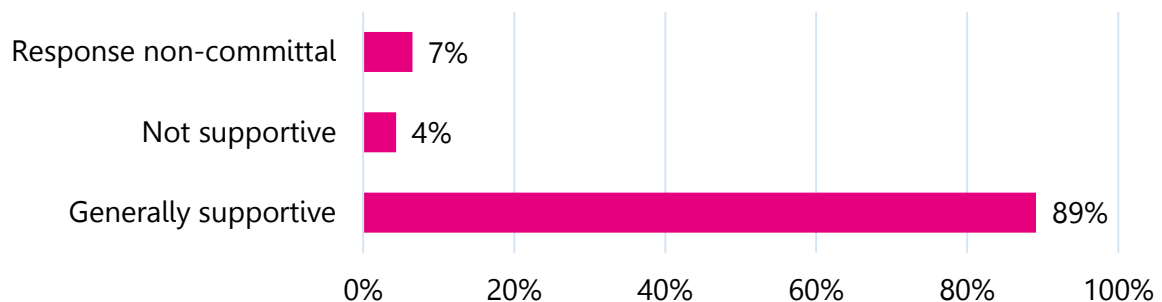
- We acknowledge those arterial routes and gateway locations that have been highlighted by respondents and will endeavour to take these into consideration as the draft Plan Strategy is developed.

### 5.13 LP13 - Spatial connectivity

#### We proposed

To include an overarching strategic policy that ensures all new development promotes greater connectivity between places. This approach would support the identification of areas of the city that suffer from poor connections between different places and neighbourhoods to facilitate greater connectivity and integration. Supplementary Planning Guidance would also be produced in order to promote a more cohesive approach that recognises the need to establish a sense of arrival into the city centre and to address its distinctive nature.

#### You said



- We asked if respondents agreed with our proposed spatial connectivity approach. A total of 46 respondents answered this question with 34 respondents providing additional comments on this matter. Overall, of those expressing an opinion, 89 per cent of respondents were generally supportive with the proposal and 4 per cent were not supportive.
- There was a broad recognition that there are too many barriers and interfaces within the city, particularly north Belfast, which needed to be addressed in line with any new development. It was suggested that the removal of defensive architecture at interface locations should be examined as part of the overall

regeneration strategy to allow for greater permeability.

- A number of responses highlighted that high levels of segregation, the divisive impact of major roads and the general disconnect between housing, green space and other essential public services have all had an impact on spatial connectivity within the city.
- Suggested solutions include the careful mapping of the city which identifies those barriers and obstacles to movement alongside a positive move towards shared space and integrated social housing developments around interface areas.
- In respect of the barrier effect of road networks, responses suggest that any strategic vision should consider how areas be made more legible, permeable and friendlier for pedestrians and cyclists and the creation of a proper high quality cycle network on wide pathways.
- Particular areas have been highlighted as having the potential to promote greater spatial connectivity if handled

### Our response

- We welcome the strong support given to the spatial connectivity strategy.
- The growth of Belfast City is a key objective of the RDS and is necessary to help drive investment in the economy, create employment opportunities and support regeneration for all. The formulation of policy that promotes greater spatial connectivity will assist in making city living attractive.
- The LDP can seek to shape the physical environment by improving accessibility to ensure key community

appropriately. These include the Sirocco works, Titanic Quarter, Northside/York Street, Ulster University campus development and the 'shatter-zone', all of which could assist in reknitting existing infrastructure so that they integrate with surrounding communities.

- A number of responses acknowledged that the city would benefit from more connected bus routes throughout the city, highlighting the link between connectivity/transport and economic growth.
- In relation to Supplementary Planning Guidance, responses suggested that providing clarity around these areas is crucial and they provide the potential for heritage-led development within this process.
- Where responses included reasons for not supporting our proposed approach, a small number of responses cautioned that the policy did not examine "the integral issues of transport and accessibility".

services and employment locations are accessible by a range of transport options, including walking and cycling.

- Facilitating good quality and direct access to key areas of the city will be one of the priorities of this policy. Access and connectivity to and between communities, services, employment and places of recreation will be examined.
- We acknowledge that Belfast is a divided city. The creation of spatial connectivity policy would give



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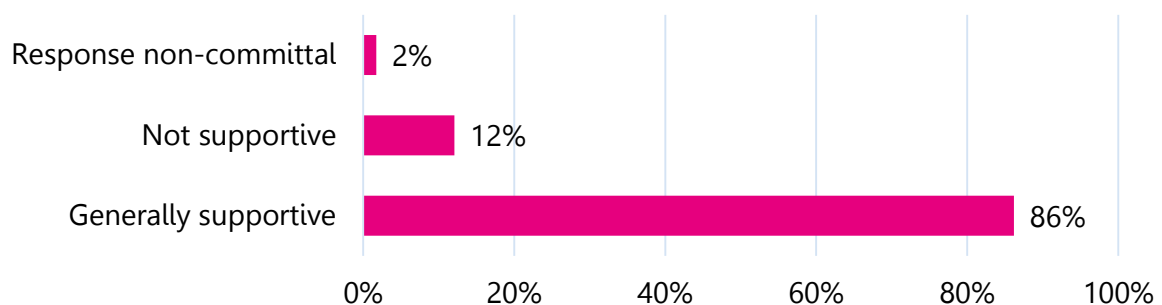
- consideration to those barriers and interfaces within the city with a view to addressing those issues that presently prevent the promotion of greater connectivity between places.
- These would include the promotion of active street frontages that provide a sense of place, the promotion of non-gated developments and the safeguarding of locally distinctive features and characteristics within new development along strategic gateways to the city. As suggested, the removal of defensive architecture at interface locations would also assist in this regard.
- We take on board those comments that many inner-city communities presently feel isolated from the city centre despite their close proximity to it and how this could be addressed in part through better streets, roads and pathway networks and how best to treat fragmented urban fabric.
- We welcome the recognition that the utilisation of our heritage assets can help to build stronger communities, enhance distinctiveness of place, connecting communities to the landscape and the potential for heritage-led development at key locations.

### 5.14 LP14 - Tall buildings

#### We proposed

To establish a policy on taller buildings that would allow the LDP to adopt an approach which identifies sites where taller buildings may be acceptable in certain locations subject to a range of criteria. This criteria would include; where they contribute to a cluster or interesting skyline when grouped, support locations of civic or visual importance and provide focus and catalyst to regeneration areas. As well as, form appropriate landmark gateway buildings, provide a focus for long distance views, positively contribute to the legibility of the city and long distance orientation and provide quality architectural assets for the city.

#### You said



- A total of 39 respondents answered this question with 42 respondents providing additional comments on this matter. Overall, of those expressing an opinion, 86 per cent of respondents were generally supportive with the proposal and 12 per cent were not supportive.

- The majority of responses acknowledge that Belfast would benefit from a policy on tall buildings, particularly in relation to managing where they should be located and where they should not be permitted.
- There was an acknowledgement that tall buildings can provide a focus and catalyst for regeneration. In this regard a number of responses have suggested that instead of being restrictive, new guidelines should instead facilitate tall buildings and therefore policy wording should suggest that acceptable proposals are required to meet some of the criteria but not necessarily all.

“ There are a number of areas within and surrounding the city centre where tall buildings would be appropriate. It is appropriate to identify these areas and provide guidance including a definition of a tall building.”  
(Planning Consultant)

- Suggested locations for proposed tall buildings include Titanic Quarter, along the Lagan and on the northern edge of the city centre adjacent to the M3.

“HED would welcome a policy with respect to managing the location of tall buildings. However tall buildings can have an impact on historic skylines and the setting of listed buildings (and other heritage assets) and would not be appropriate in all areas of the city.”  
(Historic Environment Division)

- Emphasis was also placed on ensuring that any tall building should be of a high quality design and construction.

- A number of responses did caution against allowing tall buildings to be located in areas which would obscure views of the Belfast Hills which are seen by locals and visitors as being one of the city’s greatest assets.
- Where responses included reasons for not supporting our proposed approach, reasons given included the potential for high congestion, the modest scale of the city and that policy stipulating appropriate locations could be overly prescriptive.

**Our response**

- We welcome the strong support given to the tall building preferred option.
- We acknowledge those elements of the city which contribute to Belfast’s local distinctiveness including the setting of numerous listed buildings, the special character of its Conservation Areas and Areas of Townscape Character (ATC), the unique backdrop of the Belfast Hills,

historic skylines, amenity of inner city communities and the integrity of the traditional urban grain, height, scale and massing within the more historic locations.

- In this regard, while it would be advantageous for criteria to provide clear direction on where consideration could be given to the location of tall buildings, the benefits of such criteria



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would also allow us to clearly set out those areas where tall buildings would not be appropriate, particularly if they would have a negative impact on those areas listed above.

- We agree that the protection of key views is paramount. These would include key views into and out of the city, key historic vistas and wider views of the Belfast Hills.
- We also agree that within the appropriate context, tall buildings can

make a valuable contribution from social, environmental and economic points of view and can provide a focus and catalyst for regeneration while contributing positively to the legibility of the city.

- We take on board those suggestions for tall building policy to consider architectural quality, sustainability of design, relationship to transport infrastructure, and where appropriate, a balanced mix of uses.

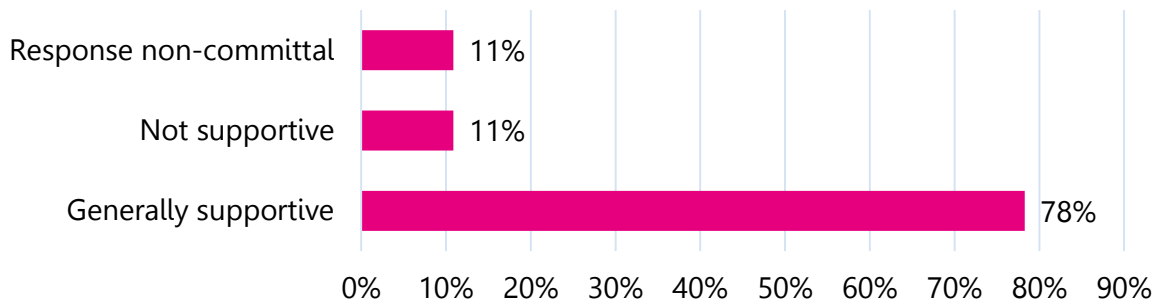
## 5.15 LP15 - Archaeology and built heritage

### We proposed

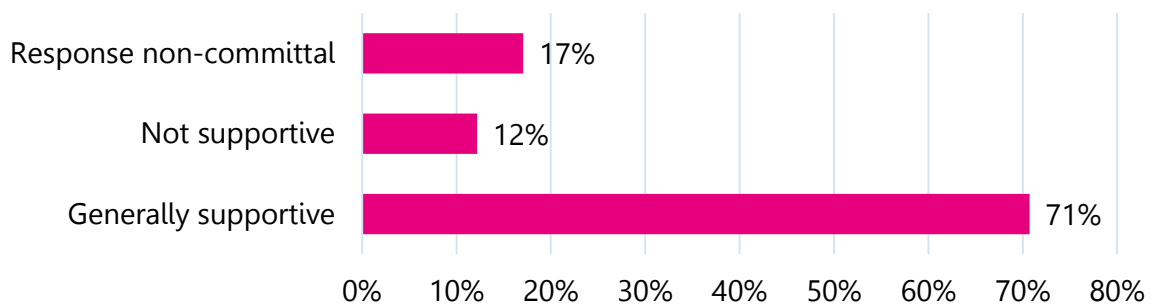
To identify the city's heritage assets and include additional policy criteria to address specific issues and demand pressures affecting the heritage assets. To review and monitor ATC, including appropriateness of current boundaries.

### You said

#### Heritage approach



#### Removal of permitted development rights



- Several comments emphasised that too many beautiful buildings are being demolished. Historic buildings give Belfast its unique character.
- Local distinctiveness is being undermined; this is essential to maintain a sense of place.
- Many stated that policy should emphasise retention and conversion of heritage assets – including residential accommodation of upper floors – for e.g. clarity in policy is to be welcomed but flexibility should be retained to permit re-use of heritage assets – not facadism.
- Some commented that new buildings should still be permitted – policy should not exclude high quality, modern design. A balance needs to be struck. New development can sit alongside historic buildings. Conservation should not deter investment.
- Heritage assets provide unique opportunities for heritage led sustainable regeneration facilitating community cohesion in shared spaces.
- Some stated that the impact of tall buildings on Conservation Areas and ATC should also be considered, and that new development should respect grain, height, scale and massing.
- In relation to a specific area it was considered that the distinctive character of the Cathedral Quarter should be maintained including the mix of independent retailers.
- Some argued that greater clarity is required as to the future interventions in terms of area built heritage designations, with greater emphasis needed on enhancement.
- Character appraisals would assist in providing certainty by identifying buildings that make a contribution to character.
- It was stated that a stronger statement in favour of support of built heritage is required.
- One stated that they strongly support supplementary policies aimed at protecting the built environment in addition to the SPPS, and that this should relate to established conservation principles and consider the setting of the historic environment and be updated to reflect changes to legislation.
- One respondent desired more Conservation Areas and ATC.
- One commentator stated that proposals affecting the historic environment should be heritage led.
- Vernacular architecture should be protected.

### Our response

- We have a statutory duty to preserve and enhance its historic environment, including listed buildings, Conservation Areas and ATC.
- Conservation Area Designation is outside the scope of the plan but a new policy in relation to Conservation Areas will seek to ensure that new developments respect their context, including their setting.
- We welcome the support for additional policy and Supplementary Planning Guidance.
- ATC will be reviewed as part of the LDP process. This is in accordance with best practice in terms of built heritage assets. This will not preclude



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designation of new ATC possibly in response to responses to public consultation exercises.

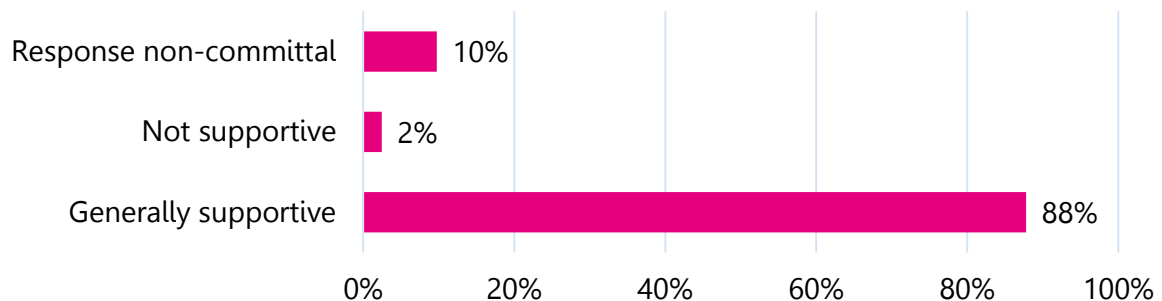
- We will consider how best to take forward the recognition of non-designated heritage assets.

### 5.16 LP16 - Local distinctiveness

#### We proposed

To provide policy on local distinctiveness which would allow the LDP to set out the unique and distinctive features of the city. This would provide guidance for applicants, decision makers and any future neighbourhood plans. It would be based on analysis of the heritage evidence base.

#### You said



- A total of 40 respondents answered this question with 35 respondents providing additional comments on this matter. Overall, of those expressing an opinion, 88 per cent of

respondents were generally agreeable with the proposal and 2 per cent of respondents indicated they were not supportive.

- There was general acknowledgement that the new LDP should safeguard the locally distinctive features of the city and should not restrict architectural innovation and creativity but should add to the richness and diversity of the city.
- A frequent issue raised was the need to safeguard the city's existing heritage by preserving and protecting our built heritage but not unduly restrict or potentially hinder development.
- There was recognition it is possible to maintain local distinctiveness and balance development, for example, the reuse of existing listed and non-

"HED considers the council should consider the preparation of a list of non-designated heritage assets (including vernacular buildings) in their local area. We intend to publish a guidance document on the identification and protection of Historic Buildings of Local Importance to assist councils should they wish to develop their own bespoke policies."  
(Historic Environment Division)



listed buildings for various uses (housing, Grade A office space etc).

- Reference has also been made to Edenderry and the retention of its sense of place and strong historic connections linked to the milling industries.
- There was particular reference for the need to develop better urban design and suggestions put forward included:
  - to give consideration to area based design teams;
  - more references to streetscape design;
  - the importance of sound within the built environment; and
  - the desire for more public art work.
- Some respondents highlighted the need to make 'real' plans for the regeneration of neighbourhoods that would allow for discussion on

permeability between divided communities, peace walls, boundaries and vacant sites.

- Recognition of natural heritage with regard to species, habitats and local biodiversity as distinctive features of the city that help to reinforce the sense of place and should therefore be addressed within any policy and guidance.
- Clarity was sought on how LP16 local distinctiveness builds on or complements the proposed retained policies under PPS 6, 'Planning, Archaeology and the Built Heritage' and the SPPS. It was thought that proposed additional layers of planning assessment to an already stretched system, be eliminated unless their added value to the LDP could be justified.

### Our response

- We welcome the strong support given to the local distinctiveness policy approach.
- We acknowledge that the LDP needs to strike an appropriate balance between protecting the local distinctiveness of a place and allowing for new high quality innovative development.
- Promoting the adaptive reuse of historic buildings within the city, if carried out sensitively and as part of heritage-led regeneration approach, would assist in strengthening local distinctiveness.
- While elements of this policy will have resonance with planning policies PPS 6 and SPPS, particularly in relation to

the reuse of historic buildings, this represents only one component of our proposed approach. In the case of new development, other components that will be pertinent to local distinctiveness include existing grain, local building forms and materials as well as the scale, massing and height of existing buildings.

- Another key area which would fall outside the would potentially be the treatment of buildings and sites that fall outside designated areas that would normally offer a degree of protection e.g. non listed buildings and sites outside Conservation Areas and ATC's. We would support HED's suggestion that consideration be



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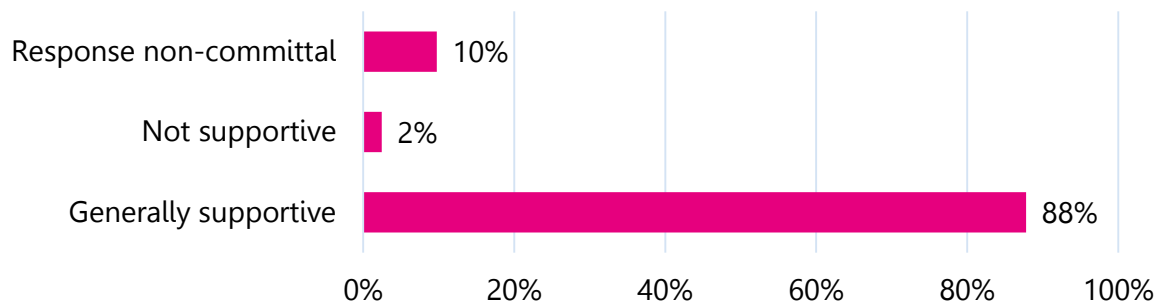
- given to cataloguing non-designated heritage assets at local level.
- We agree that socially sensitive issues such as peace walls and barriers should be addressed as part of this policy approach (with overlap in relation to other policy approaches including LP13 and VE12).
- We acknowledge that an area's biodiversity including locally protected sites, species and habitats can provide locally distinctive features of the city which can help reinforce a sense of place.
- We also acknowledge the importance of retaining local distinctiveness of smaller rural settlements such as Edenderry and Hannahstown.
- We have recently commissioned a green and blue infrastructure plan as part of an overarching Open Space Strategy for the city. This piece of work will take into consideration a range of biodiversity issues as raised by respondents.

### 5.17 LP17 - Energy efficient design

#### We proposed

To promote an approach which facilitates high standards of energy efficiency in design requiring a minimum Building Research Establishment Environmental Assessment Method (BREEAM) rating for non-residential buildings, unless it is demonstrated not to be viable.

#### You said



- A total of 39 respondents answered this question with 22 respondents providing additional comments on this matter. Overall, of those expressing an opinion, 88 per cent of respondents were generally supportive with the proposal and 2 per cent were not supportive.
- There was a general consensus that having such policy in place would be welcomed for new buildings. However, a degree of flexibility should be included in relation to the retrofitting of older buildings, including heritage assets.
- Responses suggested that consideration of energy efficiency measures early on in the process (during construction stage) would contribute to the lifetime of the property and thereby avoid costly and potentially difficult adaptation works. Phasing developments to ensure there

is room for innovative green new builds was also raised.

- Some responses believe that the policy could be more ambitious in its aspirations and should ideally deliver zero carbon buildings to deliver the low carbon future that is needed to mitigate climate change.
- In their responses, Ulster University (UU) and Belfast Harbour have commented that their new buildings, including the UU Campus in Belfast City Centre and the City Quays development, are already being developed to BREEAM standards.
- In relation to whether energy efficient design requirements should also apply to new residential buildings, the following represents a summary of responses received:

“In order to reduce our carbon footprint, the Housing Executive believes that new developments should be energy efficient....delivered in a three tiered approach, firstly reduce demand; secondly improve energy efficiency and finally providing renewables, where applicable.”  
(NIHE)

- where it is feasible and practical to do so;
- so long as the underlying viability of proposed schemes remains intact; and
- the cost of implementing these measures across housing developments would be unviable.

### Our response

- We welcome the strong support given to the spatial connectivity strategy.
- We acknowledge that cities have a key role in mitigating the effects of climate change and changing behaviours and habits will have an impact on our ability to reduce emissions and have a positive impact on climate change.
- Due consideration will be given to a ‘fabric first’ approach in relation to house construction in order to achieve high levels of energy efficiency.
- This approach would also include as assessment of physical attributes such as building orientation, passive solar gain and materials in an effort to maximise energy efficiencies.
- We recognise that any policy needs to avoid being overly onerous in relation to minimum standards for energy

efficiencies. This would be particularly pertinent in the cases of older and historic building stock.

- In the case of historic assets, specialist advice will be required to ensure that the attainment of high standards of energy efficiency does not result in the undue loss of historic fabric.
- While due consideration will be given to those measures suggested within responses received, particularly those which aspire for carbon neutral developments and refurbishment projects, we have to be mindful that they do not have an undue impact on development viability in the city.
- We acknowledge that information sharing and best practice with respect to new and innovative technology would be advantageous.



# | Creating a vibrant economy

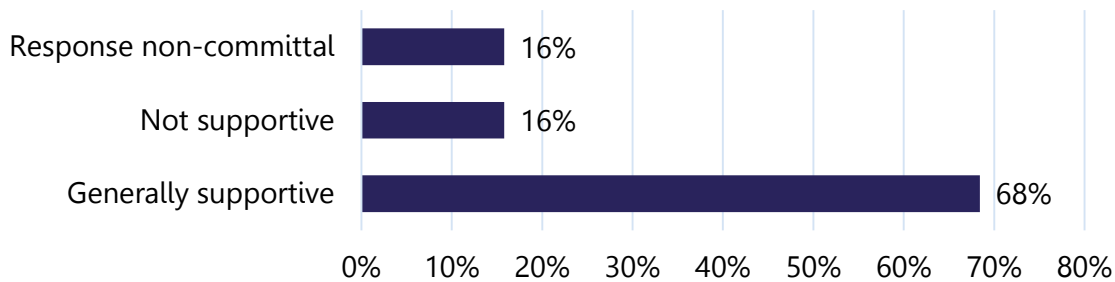


## 6.1 VE1 - Supporting economic growth

### We proposed

To identify and maintain a flexible and varied supply of business accommodation and employment land, that will allow the city to compete with similar sized UK cities and strengthen its position as the regional economic driver.

### You said



- The majority of respondents supported our proposed approach to employment growth. 68 per cent of those who responded were in general support, while 16 per cent were not supportive and a further 16 per cent were non-committal.
  - the need to support investment in the economy;
  - improving access to employment opportunities; and
  - driving regeneration in the city.
- A number of the statements of support came with caveats, for example:
  - the future impact of Brexit on the economy;
  - the quality of the jobs that are delivered;
  - concerns over the ability of the infrastructure to cope with such a high level of growth;
  - question as to whether the level of development required can be delivered over the plan period; and
  - whether there was enough land to facilitate the amount of employment land required.

"It is acknowledged that economic growth is essential to the success and prosperity of the city but such growth must be linked with accessing employment for those furthest from the employment market"  
 Community interest group

- There was broad recognition that Belfast needs to grow as the driver of the regional economy.
- The most frequent reasons cited for supporting the employment growth were:



## Creating a vibrant economy

### Our response

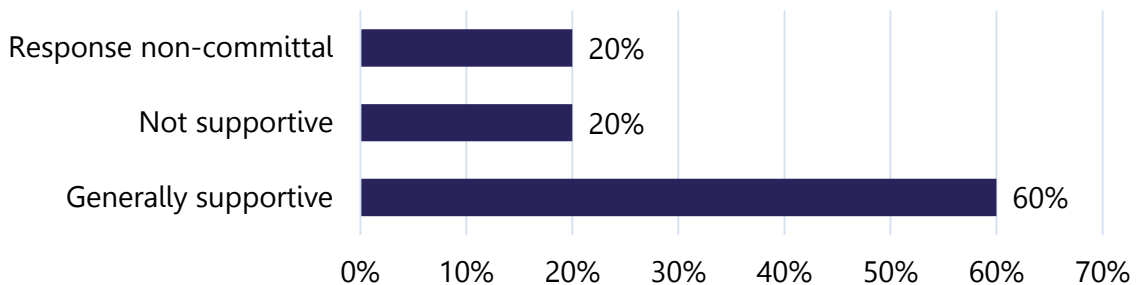
- We welcome the strong support given to the preferred growth option.
- The growth of Belfast City is a key objective of the RDS and is necessary to help drive investment in the economy and create employment opportunities.
- We recognise that the proposed level of growth is ambitious, but believe that it is also realistic and deliverable.
- We agree that the LDP should help to deliver more jobs across the city by seeking to focus new investment and development at key locations throughout the city.
- An Urban Capacity Study will consider the land available to accommodate the required development to realise growth.
- We also note the support for improved accessibility for all to employment opportunities and facilities, particularly by sustainable travel modes.
- We note your comments in relation to the sustainable reuse of existing buildings.

## 6.2 VE2 - Strategic employment locations

### We proposed

To review the strategic employment locations as set out in Belfast Metropolitan Area Plan (BMAP) and identify smaller opportunity sites to ensure projected employment needs are accommodation over the plan period.

### You said



- The vast majority of respondents supported our proposed approach to employment locations. 60 per cent of those who responded were in general support, while 20 per cent were not supportive and a further 20 per cent were non-committal.
- There was particular reference to the need for local jobs to support local communities.
- A frequent issue raised was the need to support small businesses and freelancers and not to rely entirely on external investment.
- The most frequent reasons cited for supporting the aspirations were:
  - the need to strike the right balance of employment locations across the city centre; and
  - the need to ensure employment areas are located in close proximity to areas of high deprivation and unemployment.

- Regarding the location of employment opportunities there was a strong support for the city centre and areas which benefitted from high accessibility.

"It is agreed that smaller more localised sites can provide and safeguard local jobs and prevent the need for additional travel"  
 Planning consultant

- A point raised was the need for the LDP to make provision of economic development opportunities in the countryside.
- A further comment noted was the need to introduce Section 76 planning agreements on planning approvals for

**Our response**

- We welcome the support given to the preferred option on the review of strategic employment locations.
- The review of these locations and the identification smaller opportunity sites is critical to ensure the economic growth of Belfast City and is necessary to help drive investment and create employment opportunities.
- An Urban Capacity Study will help identify an appropriate supply of employment land.
- We also note the support for the integration of transportation and land

**6.3 VE3 - Protection of existing employment land**

**We proposed**

To protect areas of existing employment against other competing uses to facilitate opportunities for economic regeneration and employment growth. While there is presumption in favour of retaining employment use, it is recognised that a flexible approach

major developments, requiring the inclusion of social clauses specifically aimed providing employment and training opportunities to young employment and the long-term unemployed.



use to improve connectivity and promote sustainable pattern of travel. The LDP will include policies that seek to ensure that new employment sites are located an appropriate locations and are accessible to all by a range of travel modes.

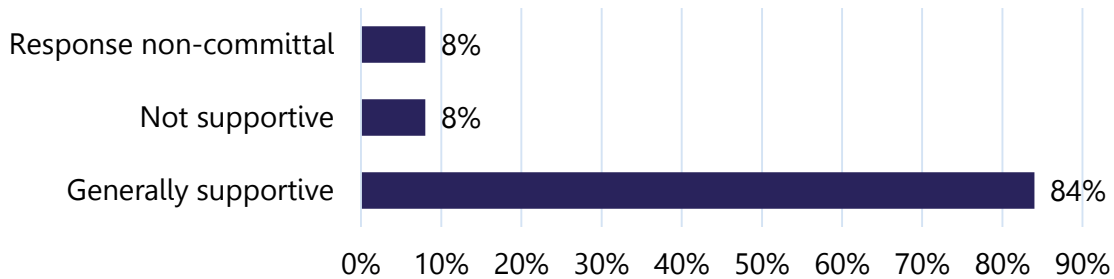
- We acknowledge that there is the need to strike the right balance of employment sites across the city to ensure equity and opportunity for all.



## Creating a vibrant economy

to allow for alternative uses on employment land where such sites are not capable of accommodating similar employment uses.

### You said



- The majority of respondents supported our proposed approach to the protection of employment land. 84 per cent of those who responded were in general support, while 8 per cent were not supportive and a further 8 per cent were non-committal.
- There was a general acknowledgement that the preferred option in respect to the protection of employment land should be flexible and responsive to changing needs.
- An issue raised was the need to balance the needs for employment growth and the land required to facilitate this growth with the demand for housing across the city.
- There was particular reference to the fact that some employment uses are incompatible to adjacent uses due to environmental issues and relocation to more suitable sites should be considered as an option.

- There was also strong agreement that brownfield sites should be considered first for employment uses.

“The overall approach to protection is in our opinion the correct one, as it ensures an adequate supply of suitable employment land in accordance with the RDS and SPPS”  
Planning consultant

- A respondent raised the point that the LDP should only allow alternative uses where there is evidence that the site has been marketed for a reasonable period of time. And there has been no take-up for employment use or redevelopment together with evidence of viability.

### Our response

- We welcome the support given to the preferred option on the protection of existing employment land.
- The protection of employment land is essential to facilitate economic growth and economic regeneration.
- We recognise that a flexible approach is required to limit vacancy and to ensure on-going beneficial use of land to maximise economic growth.
- A robust evidence base is required to underpin decisions in relation to the



new LDP. An Urban Capacity Study will help identify an appropriate supply of employment land.

- A market-led approach as suggested by a number of respondents could create issues around sustainability and piece meal development of land.
- We noted your comments concerning office development being prioritised in the city centre. The SPPS advocates a 'city centre first' approach for main

town centre uses, which includes offices. It is the most sustainable location within the city for high-density employment use.

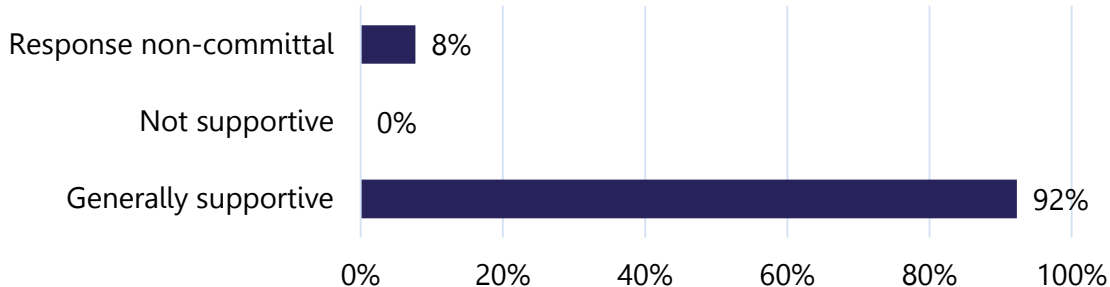
- It is welcomed that there is agreement that employment land should be periodically reviewed and that zoned land, which is not coming forward for employment use, should be considered on a site-specific basis having regard to strategic needs.

## 6.4 VE4 - Supporting development needs of higher education facilities

### We proposed

To provide a policy framework that is generally supportive of a range of development needs associated with Belfast's five Higher Education Institutions (HEIs).

### You said



- The vast majority of respondents supported our proposed approach to be generally supportive of HEIs. 92 per cent of those who responded were generally support, while 8 per cent were non-committal.
- There was broad recognition of the role of Belfast's HEIs in supporting the city's aspirations of a 'learn city'.
- The most frequent reasons cited for supporting the aspirations were:
  - to ensure that Belfast continues to have a highly educated and skill workforce to assist in the enabling economic growth and inward investment; and
  - the key role these institutions play in the research and development sectors such as ICT, cyber security and data analytics and their potential to help deliver the required economic growth over the plan period.
- A number of the statements of support came with caveats, for example:



## Creating a vibrant economy

- the need to create high quality buildings and spaces;

“The preferred option will seek to ensure that Belfast continues to have a highly educated and skilled workforce which will assist in enabling economic growth and inward investment”  
Planning consultant

- the need to properly manage student accommodation;
- that the policies relating to the five HEIs are flexible to encourage the necessary investment; and
- the need to integrate third level educational uses in a wider mix of uses to ensure vibrancy and vitality, especially in the evenings.

### Our response

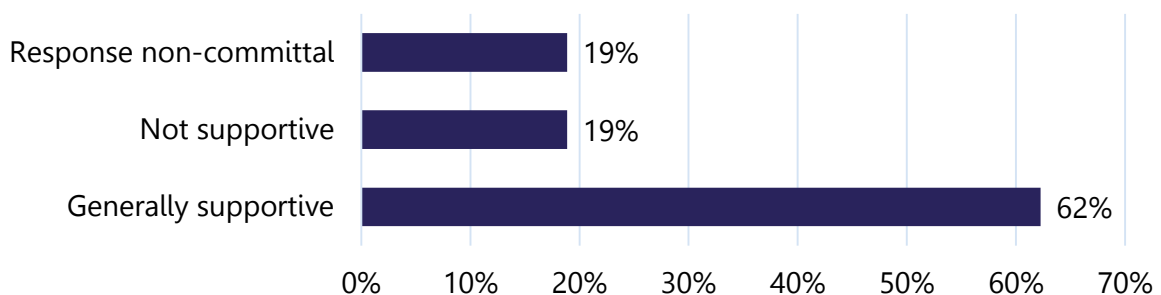
- We welcome strong support given to the preferred option on supporting the development needs of HEIs.
- Support for the five HEIs is necessary to help drive investment in the economy and create employment opportunities.
- We acknowledge the growth in the knowledge based industries and their links to the HEIs. A supportive policy approach will enable better collaboration and shared learning between these institutions and various business further enabling economic growth and inward investment.
- We note your concerns in respect to the displacement of communities and the impact of student accommodation.
- We also note your comments that seek to ensure that policies are sufficient flexible to encourage the necessary investment and allow for the construction of sufficient infrastructure to future proof these institutions over the plan period and beyond.

## 6.5 VE5 - Network and hierarchy of centres

### We proposed

To define a network and hierarchy of centres as the best framework for directing future development; based on that currently defined within BMAP: Belfast city centre; district centre; local centres; and arterial routes or commercial routes.

### You said



- The majority of respondents were supportive of defining a hierarchy and a sequential approach to provision.
- We asked if respondents if they agreed with our proposed network and hierarchy of centres. 62 per cent of those who responded were in general support, while 19 per cent were not supportive and a further 19 per cent were non-committal.
- There was broad recognition that a network and hierarchy promotes equity across the city.
- There was overwhelming support for local neighbourhood centres.
- The most frequent reasons cited for supporting the hierarchy were:
  - To allow the city centre to be a vibrant hub.
  - To ensure development is complementary not competitive.
  - To ensure a precautionary approach to out of centre development.
  - To provide local communities with local services.
- To reduce vehicle trips and promote sustainable travel.
- To promote a sense of place.
- A number of the statements of support came with caveats, for example:
  - Concerns that the transport system links do not sufficiently connect centres.
  - That Belfast city centre is not promoted at the expense of the peripheral areas.
  - That local employment is required to spend on local services.
- It was thought urban villages and streets as 'placemaking' required better mention.
- There were comments that the approach is complicated and were was need to explain/define what is meant by the centres.
- A couple of statutory partners mentioned the need for a strategy between local councils/cross-council working.

**Our response**

- We welcome strong support given to the preferred hierarchy.
- The growth of Belfast City is a key objective of the RDS and is necessary to help drive investment in the economy, create employment opportunities and support regeneration for all.
- The Belfast Agenda has identified 'living here' and 'growing the economy' as key priorities for the city. This will complement the delivery of the LDP through the delivery of a range of programmes and services to improve neighbourhoods, provide fit for purpose city services and that everyone benefits from a thriving and prosperous economy.
- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring centres are accessible by a range of transport options, including walking and cycling and will work with statutory partners DfI.
- The Retail Capacity Study, will review the status of centres and provide guidance on designation, may identify places and streets that require inclusion in the centre hierarchy.



## Creating a vibrant economy

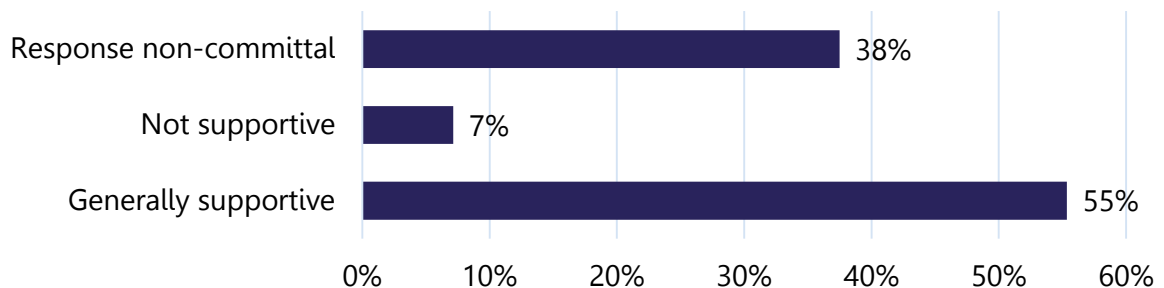
- The strategy will seek to provide a glossary of terms to clarify the nature of the centres and reduce ambiguity of the sequential test.
- A joint council working group has been set up to discuss the relationships of centres with cross-boundary catchments

## 6.6 VE6 - Defining the boundaries of centres

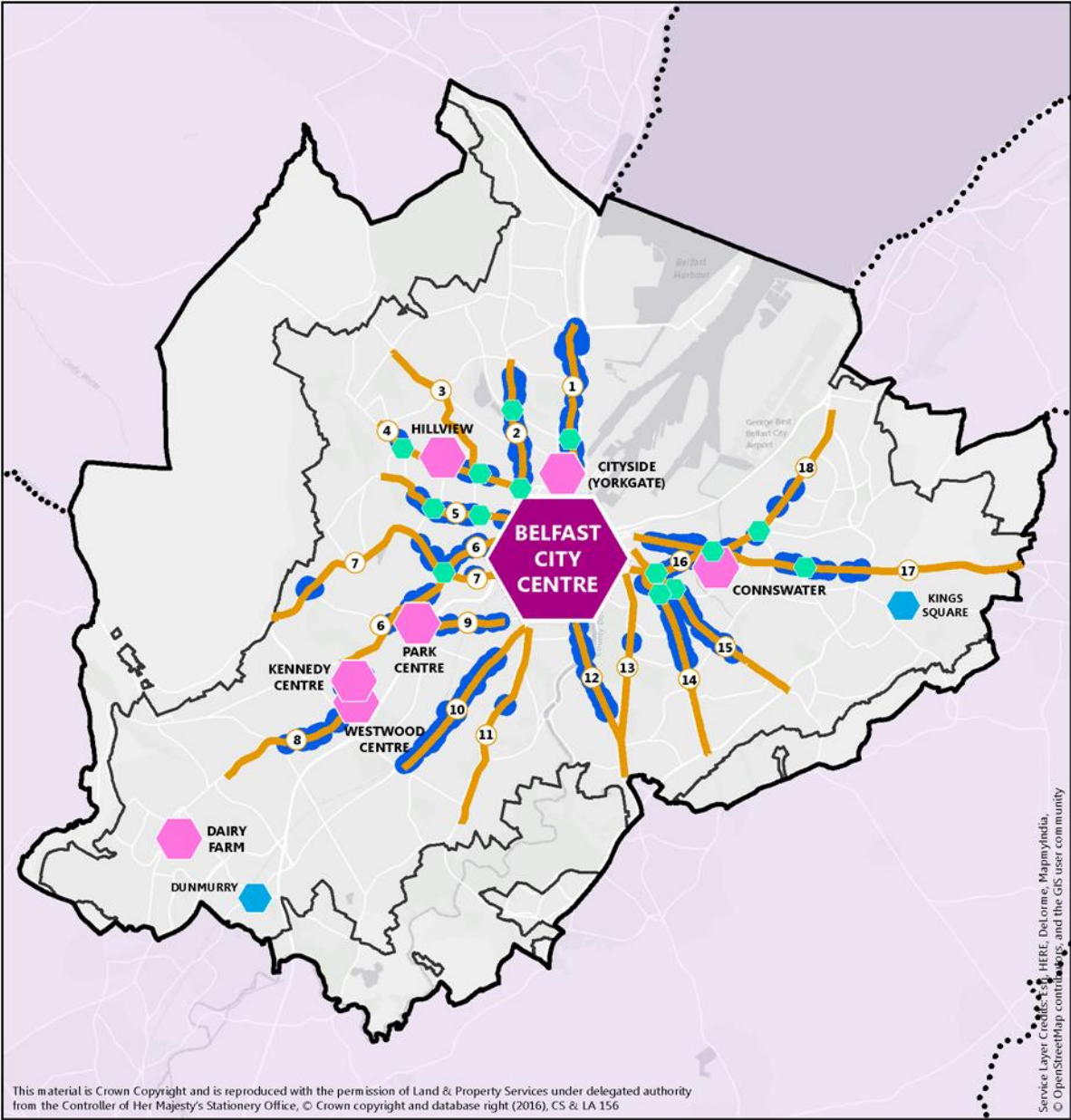
### We proposed

To define centre boundaries for all district, local and commercial nodes on arterial routes to provide a focus for managing development and investment to maintain compact centres and ensure a balance of service and community facilities.

### You said



- The majority of respondents were supportive of reassessing centre boundaries. 55 per cent of those who responded were in general support, 7 per cent were not supportive and 38 per cent were non-committal.
- There was broad recognition that centres undergo constant change and have evolved.
- The most frequent reasons cited for supporting were:
  - To better reflect the situation on the ground.
  - To provide for growing/population changes.
  - To reflect current and projected functions.
  - To provide a cluster of uses.
  - To meet a need in the catchment.
- A number of the statements came with caveats, for example:
  - That there are areas within the council boundary that do not benefit from arterial route status.
  - That transportation nodes should be at the heart of centres to connect the edges.
- Promotion of unimplemented planning consents in centres.
- A number of agents mentioned the need for a retail capacity study to be City wide and not only City Centre.
- Concerns were raised regarding the detailing of large proposals and need for robust assessment of retail impact assessments.
- There was over-whelming support for centres with distinctive flavours e.g. Ballyhackamore for its range of eateries and suggestions of more street markets.



**Retail Centres Hierarchy**

- City Centre
- District Centre
- Local Centre
- Commercial Node
- Council Area
- Metropolitan/Settlement Development Limit
- Shopping/Commercial Area (Indicative)
- Arterial Route:

- 1 York Street/York Road/Shore Road
- 2 Antrim Road
- 3 Oldpark Road
- 4 Crumlin Road
- 5 Shankill Road/Woodvale Road/Ballygomartin Road
- 6 Divis Street/Falls Road/Glen Road
- 7 Grosvenor Road/Springfield Road
- 8 Andersonstown Road/Stewartstown Road
- 9 Donegall Road
- 10 Lisburn Road
- 11 University Road/Malone Road
- 12 Ormeau Road
- 13 Ravenhill Road
- 14 Woodstock Link/Woodstock Road/Cregagh Road
- 15 Castlereagh Street/Castlereagh Road
- 16 Albertbridge Road
- 17 Newtownards Road/Upper Newtownards Road
- 18 Holywood Road

Source: Belfast Metropolitan Area Plan 2015 (Adopted September 2014)





## Creating a vibrant economy

### Our response

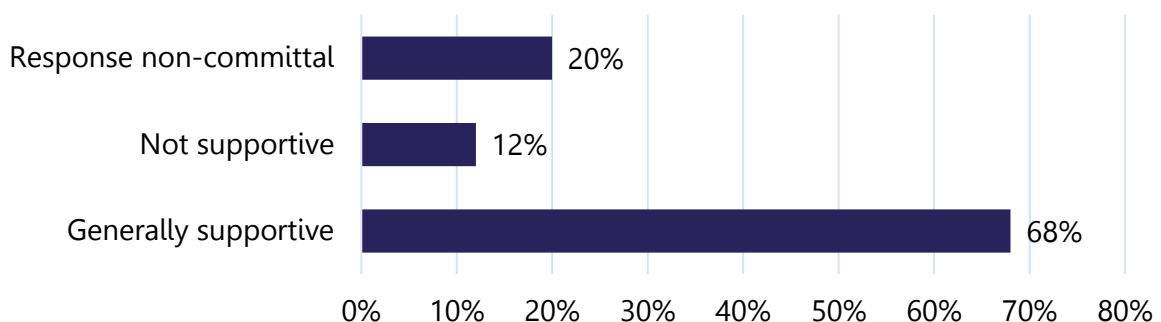
- We welcome the support given to reassessing centre boundaries.
- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring centres are accessible by a range of transport options, including walking and cycling.
- The Belfast Agenda has identified 'living here' and 'growing the economy' as key priorities for the city. This will complement the delivery of the LDP through the delivery of a range of programmes and services to improve neighbourhoods, provide fit-for purpose city services and that everyone benefits from a thriving and prosperous economy.
- A robust evidence base is required to underpin all decisions in relation to the new LDP and is one of the key soundness tests that the Plan Strategy and Local Policies Plan must pass before being adopted.
- A Retail Capacity Study will consider the health check of the centres, review the status of the centres and provide guidance on the centre boundary designation.
- We acknowledge the impact that unimplemented schemes can have on centres in terms of environmental quality, service provision and determining retail impact assessments. Planning cannot act in the commercial interest of one party and can only act within what can reasonably be delivered within our remit.
- We welcome recognition of Belfast City's uniqueness and local distinctiveness.

## 6.7 VE7 - Ensuring the vitality and viability of centres

### We proposed

That a proportion of units be maintained as Class A1 shops and change of use to other A Class uses and non-retail uses will be managed to prevent over-concentration of non-retail uses and a diverse mix to meet local shopping demand.

### You said



- The majority of respondents were supportive of managing uses to provide diversity. 68 per cent of those who responded were in general support, while 12 per cent were not supportive and a further 20 per cent were non-committal.
- There was broad recognition that retailing has evolved through online shopping and customers seek shopping destinations and retail experiences.
- The most frequent reasons cited for supporting were:
  - To prevent proliferation and provide for a large range.
  - To shape opportunities for local communities.
  - To contribute to healthier lifestyles (such as controlling hot food uses).
  - To complement the city centre.
- A number of the statements came with caveats, for example:
  - Less dependency on retail.
  - Too prescriptive may prohibit non-retail regeneration.
- Support for the twilight and evening economy.
- The impact of parking and servicing of different uses.
- Need to reduce vacancy and increase footfall.
- Importance of cafes and restaurants and other services.
- A number of local residents raised concerns around environmental quality, civic stewardship and safety of centres.
- There were also comments regarding attracting tourism shoppers.
- Questions were raised regarding what temporary uses will be acceptable.
- A number of points were made regarding balancing multi-national's shops with independents to provide for niche shopping. Concerns were raised that Cathedral Quarter would be solely retail.
- Our young people stated that they would like places for music, studios, activity centres and more shops.

**Our response**

- We welcome strong support given to managing uses.
- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring centres are accessible by a range of transport options, including walking and cycling.
- The Belfast Agenda has identified 'living here' and 'growing the economy' as key priorities for the city. This will complement the delivery of the LDP through the delivery of a range of programmes and services to improve neighbourhoods, provide fit-for purpose city services and that everyone benefits from a thriving and prosperous economy.
- A robust evidence base is required to underpin all decisions in relation to the new LDP and is one of the key soundness tests that the Plan Strategy and Local Policies Plan must pass before being adopted.
- A Retail Capacity Study will consider the health check of the centres, review the status of the centres and provide



## Creating a vibrant economy

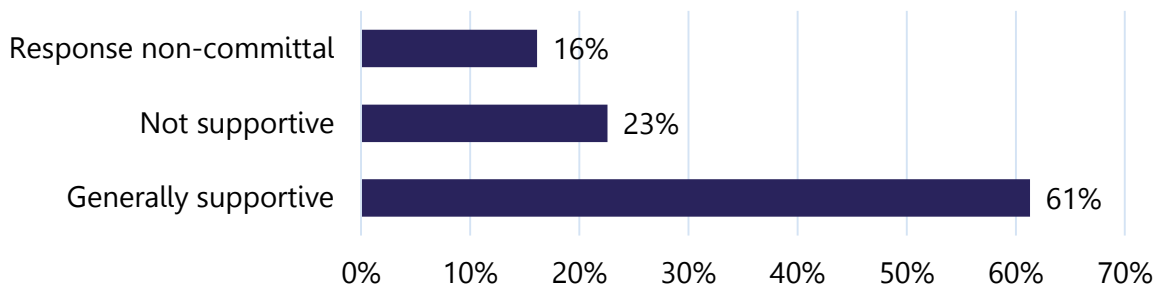
- guidance on the designation of the centres.
- We acknowledge that any retail policy requires flexibility, such as percentages for example to provide for mixed uses, cafes and restaurants which add to footfall and support the evening economy.
- We recognise the impact that parking and service delivery can have on centres functionality and will address this through Plan Strategy and Local Policies Plan.
- We welcome the recognition of civic stewardship of centres and place making to promote good places.
- We acknowledge that retail forms part of the tourism offering and need to strengthen this growing sector of the economy.
- It is acknowledged that temporary uses/pop-ups can address vacancy and provide a platform for emerging small business.
- We welcome recognition of Belfast City's uniqueness, local independent and small business and will aim to support local distinctiveness.

## 6.8 VE8 - The city centre boundary

### We proposed

To review and define the boundary to reflect the existing use, scale and built form and to accommodate the projected development needed over the plan period.

### You said



- The majority of respondents were supportive of redefining and largely extending the city centre boundary.
- 61 per cent of those who responded were in general support, while 23 per cent were not supportive and a further 16 per cent were non-committal.
- There was broad recognition that the plan should encourage a growing and evolving city centre.
- The most frequent reasons cited were:
  - To facilitate and enable future development, housing and employment.
  - To provide for growth in tourism.
  - To accommodate the river along both banks.
  - To cater for recent expansion of the University and offices.
  - To identify key areas for development.



- A number of the statements of support came with caveats, for example:
  - That there is residual land/vacancy within the existing city centre.
  - That the office core/Linen Quarter is promoted as the CBD.
  - That it is a contradiction to exclude residential areas whilst promoting city centre living.
- Better integration between eastern and western riverbank.
- A number of people raised the need for social infrastructure, shared spaces and green spaces within the city centre.
- There was suggestion of extension to the south to connect Queens University and north to connect Titanic and the waterfront.

**Our response**

- We welcome strong support given to reassessing the city centre boundary
- The RDS 2035 aims to strengthen Belfast as the regional economic driver. The LDP can shape the physical environment by bringing certainty and clarity to those seeking to develop and invest in Belfast.
- The LDP seeks to accommodate new homes in the city centre of mixed tenure and reuse through emerging policies for support and regeneration. The purpose of defining a city centre boundary will help manage appropriate city centre uses including higher density city centre living.
- We welcome the recognition of an office core and the LDP will continue to support the Linen Quarter’s role as a key office destination to promote Grade A accommodation.
- We acknowledge the vacancy and residual land within the city centre boundary which can meet need and promote sustainable patterns of development.
- We recognise the opportunities of the waterfront and need for better connections to the core and edges as identified our Belfast’s City Centre Regeneration and Investment Strategy (BCCRIS).
- We have commissioned an open space survey to identify where publicly accessible green spaces could be provided.
- We welcome suggestions of extensions to incorporate a university ‘learning corridor’ and Titanic Quarter and will address this at draft Plan Strategy and Local Policies Plan stage.

**6.9 VE9 - The city centre primary retail core**

**We proposed**

To review the primary shopping area and the type of uses and define the boundary necessary to accommodate future growth.



## Creating a vibrant economy

### You said

- The majority of respondents supported definition of the primary retail core but did not express preference to increasing or decreasing its size.

character  
E-commerce  
adequate infrastructure destination  
balance <sup>unique</sup> linkages  
transport  
cultural mix  
pedestrian  
vacancy  
flexibility

- There was broad recognition that there is need for flexibility to changing trends and circumstances in retailing.
- The most frequent reasons cited for supporting a defined core were:
  - To drive footfall.
  - To maintain a vibrant core.
  - To accommodate growth and investment.
  - To identify key areas for development.
- A number of the statements of support came with caveats, for example:
  - That there exist great levels of commercial vacancy.
  - Retail frontages are dead once shops close.
  - There is a decline of physical space required due to online shopping and the digital economy.
  - Non-retail activities are needed to complement retailing.
  - The necessity to sustain independents and our unique character on our high street.
- There was a question if the primary retail core and frontage are supported through regional policy.
- A number people raised the need for continued betterment of public transport and pedestrian access to allow the primary retail core to compete with free parking at centres out of town.
- There was suggestion of more affordable units alongside need for units of larger footprint to accommodate large anchor stores.
- Concerns were raised that the PRC does not have the infrastructure network capacity to accommodate development.
- There was suggestion of more shared surfaces and environmental improvements such as seating to socialise, performance space and art/murals.
- Many respondents were worried that buildings of heritage are being demolished in the primary retail co

**Our response**

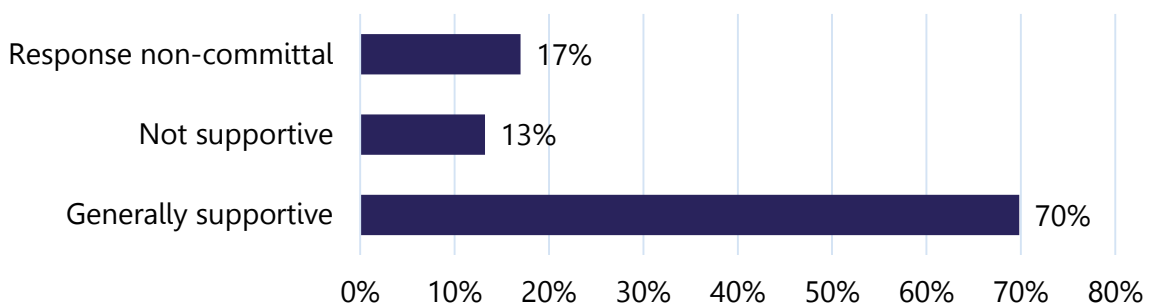
- We welcome support given to defining a retail core.
- The RDS 2035 recognises Belfast City as the primary retail location in Northern Ireland and the LDP will continue to support and strengthen the distinctive role of the city centre.
- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring centres are accessible by a range of transport options, including walking and cycling.
- In addition, we will continue to work with our statutory partner for transport delivery and stakeholders to adapt to changing servicing and delivery means and foster new management solutions.
- We welcome recognition of Belfast City’s small business and will aim to support alongside larger multi-national stores by promoting appropriate policies.
- We acknowledge that any retail policy requires flexibility and clear policy for an appropriate mix of uses, cafes and restaurants which add to footfall and support the evening economy.
- The LDP will continue to build the city’s resilience for future generations through improvements to green and blue networks capacity.
- We also welcome the recognition of place making to promote good places
- The LDP will seek to include policies to protect and enhance the built environment that fosters our local distinctiveness.

**6.10 VE10 - Supporting leisure and tourism in the city centre**

**We proposed**

To support leisure and tourism in the city centre with a policy framework to guide development and support opportunities for tourism projects and hotels in recognition of the role of the city centre as a regional economic driver.

**You said**



- 70 per cent of respondents were generally supportive of our preferred leisure and tourism option. 13 per cent were not supportive and a further 17 per cent were non-committal.
- There was broad recognition that policies for the tourism industry, leisure, cultural facilities, and accommodation is important to



## Creating a vibrant economy

strengthen Belfast's role as the regional economic driver.

- There was broad support for a 'city centre first' approach policy framework to support tourism and leisure development to:
- Reinforce it as the focus for cultural, entertainment, tourism and leisure facilities.
- Develop an evening economy.
- Integrate the city centre as a place to live, work and play.
- Identify development sites and historic buildings for key visitor attractions,
- Include the natural environment, to form a green network as a visitor attraction.
- Protect and enhance the natural environment and the built heritage that attracts tourists.
- Mixed views concerning hotel developments being located specifically in the city centre. However, hotel accommodation should be developed within a defined tourism cluster such as Titanic Quarter, or at

### Our response

- We welcome the support given to the preferred option.
- The growth of Belfast City is a key objective of the RDS and is necessary to help drive tourism and leisure investment in the economy, create employment opportunities and support regeneration for all.
- Our Integrated Tourism Strategy will help to deliver our ambition to double the value of tourism in the city. It will help to inform the LDP Policy framework.
- The Integrated Tourism Strategy builds on Belfast's unique cultural appeal and

strategic locations accessible to transport hubs.

- The plan needs to ensure a wide range of tourist accommodation is provided for all tourists. Should encourage the refurbishment of heritage buildings for tourist accommodation, floating hotel and themed hotels.

"Policy for Tourism and Leisure aligns perfectly with what is expected of Belfast and its environs, i.e. an authentic and people centred small City with a history which dwarfs its physical size."

- Consideration should be given to the provision of overnight coach parking facilities in the city centre to encourage more tourist to stay overnight in city centre hotels
- Policy should include art and cultural attractions, to promote cultural tourism.

history, its built heritage and natural environment. It recognises that these are the inherent attractions that appeal to visitors and tourists.

- The city centre is key to creating economic growth, however it has still some way to go in being a city centre tourism destination in comparison to other European Cities of comparable size.
- It is recognised that a strong city centre requires a policy framework to deliver an appropriate mix of tourism and leisure facilities that can offer variety during the day and evening

that would encourage tourist and visitors to extend their stay.

- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring key tourism and leisure attractions are accessible by a range of transport options, including walking and cycling.
- The Belfast Agenda has identified tourism and leisure as a “City Development Priority” to create a strong sense of place that will attract visitors to the city.
- The Belfast Agenda has identified the need for a world class visitor attraction

in the city centre, which would have huge benefits for Belfast and transform the city tourism offer that would be complementary the existing offers including Titanic Quarter.

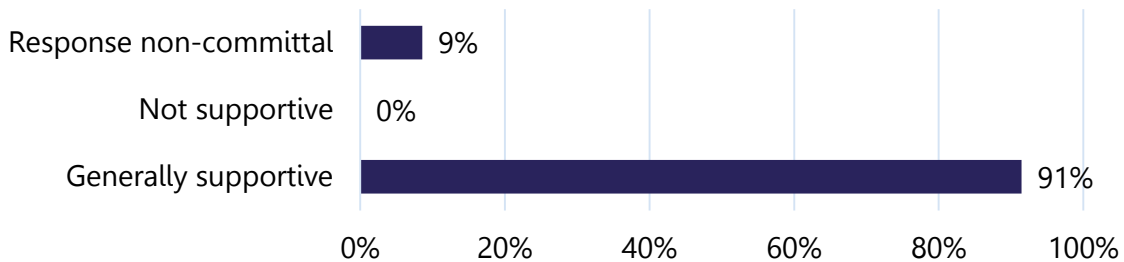
- Recognise that there may be existing tourism clusters out with the city centre i.e. Titanic Quarter, Queen’s Quarter that have a role in delivering a strong city tourism brand.
- The LDP will examine the opportunity to make provision for overnight coach parking in the city.

## 6.11 VE11 - City centre living

### We proposed

To accommodate a significant proportion of new residential development within the city centre by supporting increased densities, reuse of existing buildings and inclusion of residential accommodation as part of mixed use development schemes.

### You said



- 91 per cent of respondents were generally supportive of our preferred city centre living option. 9 per cent were non-committal.
- Respondents recognised that the provision city centre living can provide the following benefits:
  - increasing the supply of housing to promote growth;
  - regenerating and revitalising the city centre;
  - providing a safe and secure environment;
  - improving commercial viability for businesses;
  - ease of access to services and community facilities;
  - reducing social isolation;
  - reducing pressure for greenfield development; and
  - reducing the need to travel and traffic congestion.



## Creating a vibrant economy

- The majority of respondents stated that city centre living would encourage vitality and a more vibrant city. In particular, it was noted that it could help extend activity after 5pm to improve the evening economy in the city centre that would be more welcoming for residents and visitors
- A number of the statements of support came with caveats, for example:
  - Require good service and community infrastructure to create a balanced city centre neighbourhood ie schools, playgrounds, convenience shops.
  - Require good quality green spaces for informal play, walking cycling and relaxation.
- It was suggested that residential developments should be part of mixed use developments and buildings, to provide a mix of tenures, sizes and types of accommodation.
- Good support for refurbishing derelict and listed buildings for residential development. In particular, the reuse of vacant upper floors for living Over the Shop (LOTS) schemes. There should be opportunities for the provision of work spaces within LOTS accommodation.
- To encourage people to live in the city respondents identified a range of issues that would need to be considered as part of the Plan Strategy process:
  - Provision of mixed tenure and housing types within residential schemes to appeal to all demographic groups.
  - Affordability based on price, and suggestions of incentivising city centre living, reduced rates, access to subsidised public transport or car sharing pools.
  - Improvements in internal residential space standards, providing flexibility to reflect lifestyles and household types. This should include balconies, and roof gardens.
  - Require services and facilities that support city centre living, local shops, schools, leisure and cultural facilities.
- Many respondents stated that access to new green spaces (parks, community gardens, allotments) in the city centre would be important if housing density was to increase. In particular, green walking and cycling networks would make the city centre accessible to reduce the need for a car.
- Safety particularly at night would need to be improved with a better street lighting.
- Need to consider night time noise and incompatible uses pub/clubs adjacent to residential accommodation.

### Our response

- We welcome the strong support given to the preferred option to encourage city centre living, as it makes a key contribution to bringing added vitality throughout the day and evening. A growing city centre population is therefore a key objective for the LDP.
- Within the city centre, residential accommodation is likely to be an important part of mixed use

developments, particularly on larger development opportunity sites.

- The RDS seeks to grow the population of the city by providing a wide variety of additional dwelling types. The plan will seek to provide for all types of tenure to create balanced communities and a shared sense of ownership by all. Encouraging an increase in residential uses will help re-invigorate the city centre. The LDP

will facilitate improve accessibility to local services, community facilities and connectivity to open spaces and green infrastructure network across the city.

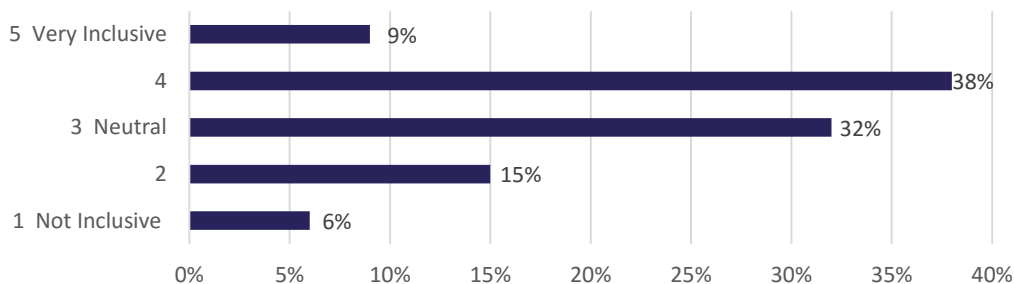
- In the preparation of the LDP a HNA/HMA will be prepared to identify the right mix of housing tenures, including social housing, open market and affordable housing, for the city centre.

## 6.12 VE12 - Shared space in the city centre

### We proposed

To promote the principles of a shared society through guidance and a spatial approach built on improving connectivity, delivering balanced development and supporting regeneration.

### You said



- We asked respondents how inclusive they think the city centre is. 48 per cent stated that it was very inclusive or inclusive whilst 32 per cent did not consider it inclusive or not inclusive.
- It was stated that the city centre was not just a place to shop; but it should be about creating attractive communal and event spaces where people want to meet, to sit and talk with friends.
- Refocussing role of the city centre as a shared meeting place rather than just a retail destination would encourage more social cohesion.
- Support for additional open spaces and parks. In particular, green spaces

in the city centre suitable for children and families. It was stated that open spaces can positively encourage social cohesion.

- There was concern expressed about existing open spaces being used for bonfires. Suggested alternative uses should be considered for the bonfire sites that would help to regenerate the communities.
- There were suggestions for mixed use developments and pilot schemes in the city centre that would help to promote community inclusion.
- There were references to reconnecting the city, and the need to plan for the



## Creating a vibrant economy

regeneration of the interface boundaries, walls and adjacent neighbourhoods. Improving physical and visual links to the city centre would help to demonstrate that the centre is easily accessible from surrounding neighbourhoods. There was a suggestion that Urban Connection Projects, not plans, could help encourage belief in the 'One City' agenda.

- Design of spaces is important to create a sense of inclusivity and promote improved accessibility for all groups. Need to create quiet audibly comfortable open spaces would encourage a greater mix of people using the open spaces. Guidance, such as, Lifetime Neighbourhoods, Department for Communities and Local Government (DCLG), Building for Life, and Inclusion by design, from Design Council would be beneficial.

### Our response

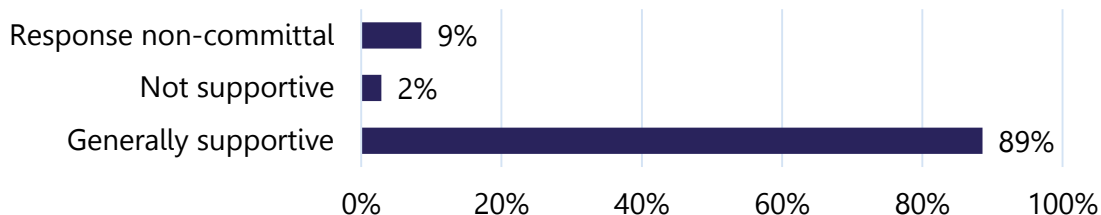
- We welcome the support given to the preferred option to encourage social cohesion and inclusivity.
- The RDS promotes development which improves the health and wellbeing of communities and the SPPS elaborates on this through its principles of creating and enhancing shared space and supporting good design and positive 'placemaking'. This is emphasised within document 'Living places an urban stewardship and design guide for Northern Ireland' and Executive policy 'Together-Building United Communities' 2013.
- The LDP will seek to shape the physical environment to improve accessibility, particularly for the mobility impaired in the city centre.
- The LDP proposes the development of a 'green and blue infrastructure network' within the city which would help to reconnect the neighbourhoods to the city centre.
- The Belfast Agenda has identified 'Living Here' as one of the four key priorities for the city. We will work in partnership to help deliver a more inclusive city for all.

## 6.13 VE13 - City centre development opportunities

### We proposed

To provide a policy framework to guide development and regeneration opportunities in recognition of the city centre role as the regional economic driver.

### You said





- We asked respondents if they considered the preferred option for employment growth to be a realistic ambition for Belfast.
- 89 per cent of respondents were supportive for the preferred option to provide policy frameworks, masterplans and supplementary guidance to identify development sites and to guide development. A variety of reasons were provided in support:
  - To identify sites and establish the context for individual projects
  - To provide certainty for investors.
  - To guide regeneration at key city centre development sites, to deliver a mix and diversity of uses,
  - Provide useful design guidance to the development sector
  - To encourage economic development and generate employment opportunities
  - To address a range of complex urban issues
- Provide urban design frameworks to promote ‘placemaking’.
- It is a positive process that helps to unlock development opportunities, attract investment, engage local communities, identify priorities for action and clarify the actual delivery strategy.
- There were some caveats concerning policy frameworks which needs to be considered:
  - Be aspirational, realistic and flexible to respond to changing economic circumstances over the plan period.
  - Should pay due respect to the historic environment and be based on consultation.
  - Not to be overly prescriptive to restrict economic development.
  - Only used to guide and influence those decisions, it cannot dictate them.
  - Commercial and economic factors will determine where investment and development go.
  - The mix of uses for each opportunity site should be clearly identified in Key Site Requirements within the LDP.
- There was support for development contribution to provide a balanced mix of tenure within a housing development. Particularly the implementation of an affordable housing contribution.
- Though there were qualifications that developer agreements must be based on a clear statement of the need for contributions, ideally linked to the community plan and a charging schedule should be developed to enable certainty over the extent of contributions. Also it should take account of commercial viability.

**Our response**

- We welcome strong support given to the preferred option.
- The growth of Belfast City is a key objective of the RDS and is necessary to help drive investment in the economy, create employment opportunities and support regeneration for all.
- The plan will bring forward supplementary guidance with regard to developer agreements and contributions which can better



## Creating a vibrant economy

facilitate the development of land and activities to be carried out within the city centre. These agreements and contributions can be used to improve public realm and physical connections; provide for a balanced mix of tenure within a housing development or to facilitate hotels and offices within the city centre.

- While our functions are restricted by the devolvement of powers to differing authorities, there is every eventuality that regeneration powers will be devolved to us over the plan period which may provide the plan with greater scope and further opportunities.





# A smart connected and resilient place



## 7.1 SCR1 - Telecommunication infrastructure

### We proposed

To support the development of new telecommunications infrastructure or promote an upgrade of existing networks to support the competitiveness of the city and region; enhance connectivity; and encourage investment.

### You said

- The comments reflected the growing importance of access to high-quality digital communications for businesses and homes as well as in the wider environment.
- Comments reflected the view that a modern and comprehensive network of infrastructure crucial for growing the population of Belfast and the need for greater investment in the digital infrastructure.
- DfI noted the important role the planning system must play in supporting the Executive and wider government policy and strategies to address any existing or potential barriers to infrastructure development.
- A number of comments requested enhanced coverage of Wi-Fi across the city and region.
- The scope for improving deployment of digital infrastructure was raised by ensuring it is integrated into other infrastructure projects at an early stage such as transport infrastructure and also in new residential development to ensure it is “smart” and facilitates changes to working patterns. Access along greenways, cycle-ways and in parks was also raised.
- One comment mentioned that environmental sensitivity in the POPs approach should also include factors beyond visual amenity.

### Our response

- We welcome the support for the proposed approach to the development of telecommunication infrastructure.
- We recognise the importance of a high quality telecommunications infrastructure and the role the LDP can play in facilitating its development.
- The scope for improving the deployment of digital infrastructure by ensuring it is integrated into other infrastructure projects is noted and will be supported in the approach going forward.
- The approach will ensure that the criteria for the siting and design of the new telecommunication infrastructure considers visual amenity and wider environmental factors.

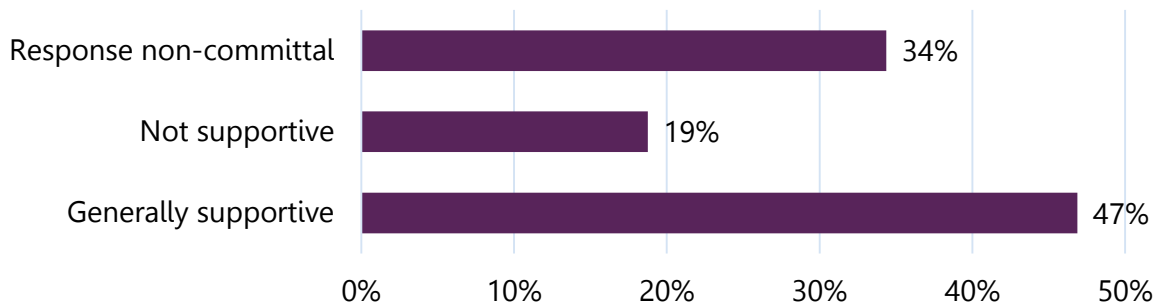


## 7.2 SCR2 - Water and sewerage infrastructure

### We proposed

The LDP will seek to facilitate the development of water and sewerage infrastructure in an efficient and effective manner while keeping the visual and environmental impact to a minimum.

### You said



- 47 per cent of respondents were generally supportive of our preferred option for the development of water and sewerage infrastructure.
- The importance of investment in upgrading the water and sewerage infrastructure to accommodate future growth and development was highlighted. There is a concern that infrastructure would not keep pace with the proposed growth and it is currently under strain.
- DfI requested further consideration of this option in connection with other work on the development of GR1 - Supporting economic growth option and calls for close working with statutory bodies and service providers.
- The Department stated that it will bring forward work in relation to spatial planning and infrastructure delivery which will build on the RDS as the overarching spatial strategy for Northern Ireland. This will take the spatial elements of the RDS to form a vision for the delivery of infrastructure at a regional level up to 2050.
- There was strong support for SuDS and that our draft plans should commit to SuDS by stipulating that planning applications for housing and commercial development must include consideration of SuDS, as laid out in the SPPS and the Long-Term Water Strategy for Northern Ireland.
- Concern was raised on the potential capacity of Waste Water Treatment Works (WWTW) serving the city and that the POP makes no reference to any potential WWTW capacity issues, either now or in the future as a result of the predicted growth strategy.
- Concern was also raised that the approach may not achieve appropriate integration of infrastructure needs and environmental considerations. Respondent suggested for future upgrade work to water and sewerage infrastructure it should be ascertained if there are any environmental implications.

- The Department for the Economy (DfE) raised the issue of groundwater which can be viewed as a natural resource that requires careful protection and as a water source that can be used for growth and economic development. DfE requested that both aspects are given consideration so as to look after the valuable resource and to use it

sustainably to enhance and support future development needs.

- A respondent highlighted the need for the plan to recognise the need to protect and improve water quality. The plan does not make the links with water quality objectives under the Water Framework Directive (WFD), and the current risks with water status throughout Belfast and Belfast Lough.

### Our response

- We welcome the support for the preferred option for water and sewage infrastructure.
- The importance of investment in upgrading the water and sewerage infrastructure to accommodate future growth and development is recognised. It is proposed under GR1 - Supporting economic growth option that there will be a phasing of development to ensure that delivery aligns with infrastructure investment. We propose a close working relationship with infrastructure providers in the development of the LDP and note that the Department will bring forward work in relation to spatial planning and infrastructure delivery.
- The strong support for the consideration of SuDs is noted and is outlined under SCR12 Flood risk preferred option. Our approach recognises the need to promote SuDs within all elements of design to ensure a proactive approach towards flood risk and help alleviate risks and concerns.
- The approach recognises the importance of environmental considerations and will give further consideration to the water quality objectives outlined under the Water Framework Directive.
- The need to consider the issue of groundwater is noted and it will be given further consideration.

## 7.3 SCR3 - Electricity and gas infrastructure

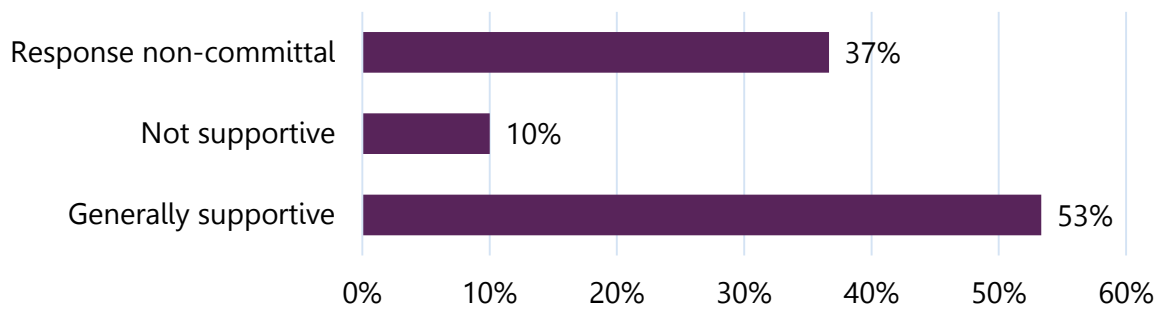
### We proposed

To develop new or replace/upgrade existing infrastructure or grids by utility providers. The LDP will seek to facilitate the development of such infrastructure in an efficient and effective manner whilst keeping the visual and environmental impact to a minimum.



## Smart connected resilient place

### You said



- Investment in upgrading the electricity and natural gas network, as well as exploring renewable heat and energy was highlighted as essential to grow Belfast's economy and support a growing population.
- The Department highlighted the need for overlapping boundary issues to be identified in relation to electricity and gas infrastructure. They also stated that critical infrastructure should not be located in flood plains or flood-prone areas.
- A number of comments called for electricity and gas infrastructure to be considered under an 'Energy' heading, alongside SCR10 - Renewable energy.
- The location of electricity and gas infrastructure developments was raised as a concern and the potential risks posed if it is located close to residential areas and the city centre.
- SONI, the provider supported the approach outlined in the LDP and suggested the inclusion of the additional text:  
that the LDP "will seek to facilitate the development of such infrastructure and any other infrastructure that may be deemed necessary by utility providers in an efficient and effective manner whilst keeping the visual and environmental impact to a minimum."
- SONI would also like to see a policy to protect existing strategic transmission infrastructure in the new Plan as follows: "Planning applications in the vicinity of existing transmission substations and other transmission grid infrastructure must demonstrate that they are not in conflict with any future development of such infrastructure in the interests of ensuring the consistent and reliable transmission of electricity on Northern Ireland's high-voltage grid."
- SONI referred to the principle underlying the SPPS that new power lines will be considered having regard to potential impact on amenity and should avoid areas of landscape sensitivity, including Areas of Outstanding Natural Beauty (AONBs) and seeks to comply, however it stated that it may not always be possible to avoid AOBNs because of the nature of generator and demand locations.
- The cost of energy in Northern Ireland was raised as an issue and the importance that the plan facilitates the development of alternative forms of energy in a manner which will make Belfast more competitive. Several comments suggested that the council proactively enables the development of storage facilities for electricity.



**Our response**

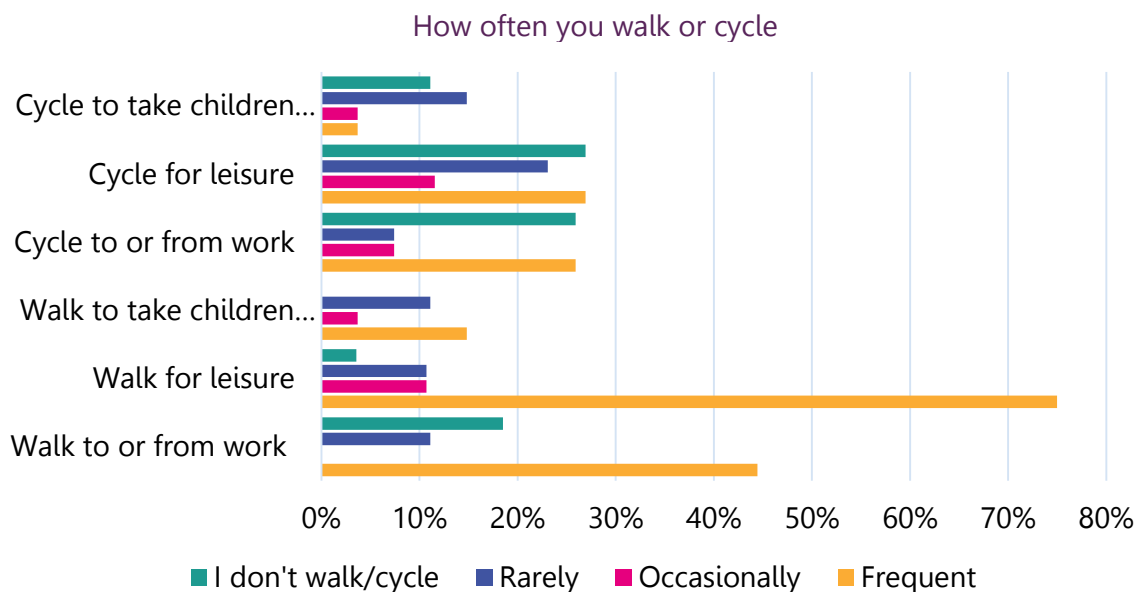
- We welcome the support for the electricity and gas infrastructure option. The importance of the energy network to ensure sustainable economic growth is recognised.
- The need for overlapping boundary issues to be identified in relation to electricity and gas infrastructure is recognised and a working group has been set up with neighbouring authorities to deal with any regional issues.
- It is noted that critical infrastructure should not be located in flood plains or flood-prone areas.
- The need for the LDP to actively promote the adoption and location of technologies that will facilitate an effective and efficient grid is paramount and will be emphasised in our approach.
- Our approach is in line with the principle outlined in SPPS that new power lines will be considered having regard to potential impact on amenity and should avoid areas of landscape sensitivity, including AONBs. It is noted that that it may not always be possible to avoid AOBNs because of the nature of generator and demand locations.

**7.4 SCR4 - Walking, cycling and sustainable modes of transport**

**We proposed**

To support walking and cycling as sustainable modes of transport by the provision of facilities and safeguarding existing and proposed cycle and walkway routes to encourage active travel. The plan will support design guidance that encourages pedestrian movement and establishment of safe and attractive pedestrian routes.

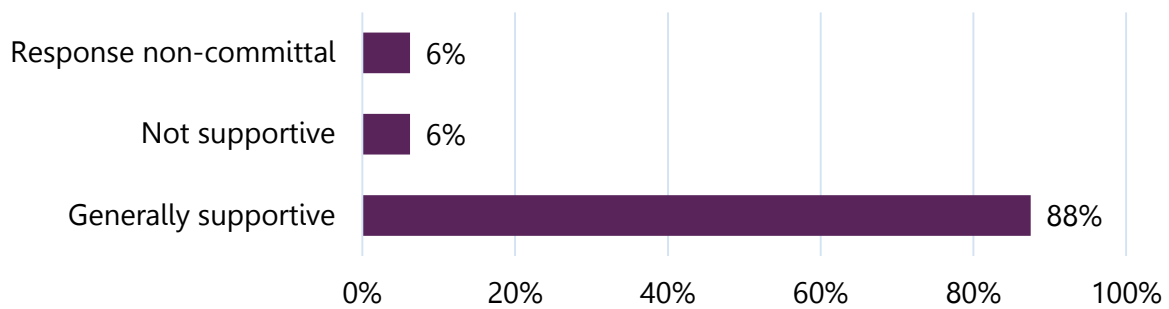
**You said**





## Smart connected resilient place

We also asked if you would walk or cycle more if there were improved networks and connections in place.



- 88 per cent of respondents were generally supportive of our preferred approach for walking and cycling.
- A majority of the comments related to the cycling infrastructure in Belfast and the need to enhance and improve the infrastructure through the provision of high quality, segregated cycle routes as part of an integrated network. There was also support the provision of secure cycle parking and shower facilities for employees in new developments.
- It was stated that the LDP should support the Bicycle Network Plan for Belfast, and should also take follow best practice from cities with very successful cycling networks, such as Amsterdam or Copenhagen.
- In relation to walking, it was noted that Belfast does have some good walking routes but they are not well signposted or promoted. The increased use of green and blue infrastructure was acknowledged and the need for better connectivity between green spaces and parks with directional signage for walkers and cyclists. Opportunities for better usage of our green assets such as Lagan Valley Regional Park, Bog Meadows and Belfast Hills was highlighted. New routes linking communities and connecting to the city centre should be explored, the Connswater Community Greenway project was cited as an example of good practice.
- Antrim & Newtownabbey Borough Council welcomed further discussion on any identified overlapping boundary issues in terms of walking and cycling links.
- The importance of urban design principles was highlighted which create a built environment to support and encourage walking by providing for pedestrian comfort and safety and connects people with varied destinations.
- The lack of cross city walking and cycling routes was raised and the need to address the poor urban environment 'shatter zones' which connect the city centre to neighbourhoods.
- British Telecommunications (BT) suggested that there is real scope for improving deployment of digital infrastructure by ensuring it is integrated into infrastructure projects, such as walking and cycle routes.
- The Housing Executive supported SCR4 -Walking and cycling and the emphasis on sustainable transport. It was their view that sustainable transport policies to encourage

choices including walking, cycling and public transport can promote healthy lifestyles, minimise climate change and to improve connectivity for those who do not have access to a private car, including children and older people.

- Respondents stated, the LDP should promote and support development that puts walking and cycling (and public transport) ahead of the private car, in accordance with the principles of sustainable urbanism.
- A representation from Sustrans called for the adoption of policies that embed Active Travel in all developments and ensure integrated land use planning. For example, a clear policy of creating safe routes to

schools, public transport nodes and other key community links.

- The role of the Belfast Public Bike Share Scheme was recognised and that it has been transformational in terms of cycling within the city. A number of comments called for the scheme to be developed and extended in a strategic way, for example, linked to new developments as an alternative to car parking provision
- Smart cycle parking at key Belfast Rapid Transit (BRT) stops was suggested along with the need for the LDP to focus on integration of walking and cycling routes with public transport.

### Our response

- We welcome the strong support for the preferred option for walking and cycling. We agree that the plan should facilitate the development of active travel network to encourage a modal shift and achieve health and environmental benefits.
- The LDP will support good design and positive place making to encourage walking and cycling and journeys linked to public transport.
- The approach will promote the provision of adequate facilities for cyclists in new developments as outlined in the SPPS.
- The successful integration of transport and land use is a key principle in our approach and we are committed to working closely with the DfI on the review of the Belfast Metropolitan Transport Plan and to facilitate the implementation of the Belfast Bicycle Network Plan.

## 7.5 SCR5 - Public transport network

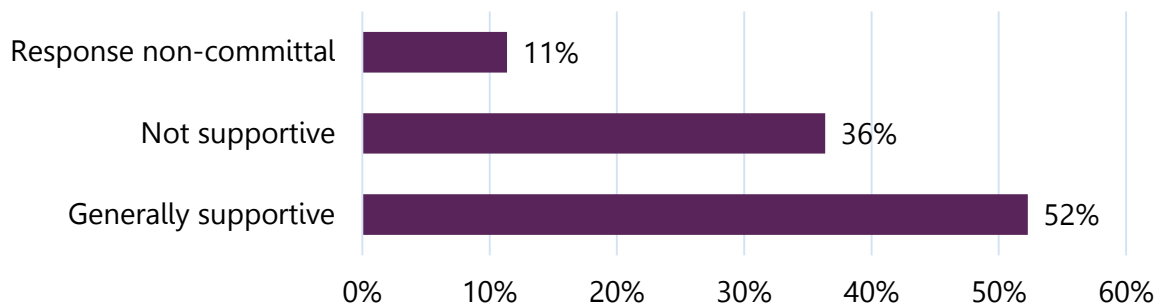
### We proposed

To protect the land required to facilitate new public transport schemes or planned improvements to the existing network. The plan should encourage higher density developments and promote regeneration opportunities linked to new and existing public transport networks.



## Smart connected resilient place

### You said



- Over half the respondents to the question, supported the approach outlined in the POP for public transport.
- Comments indicate support for initiatives which will encourage a modal shift toward sustainable transport options and an emphasis on movement of people rather than cars.
- Translink state that city centre penetration by bus is an asset in competing with out of town shopping centres and should not be further compromised by future public realm or regeneration schemes.
- Some criticism was received on the existing bus lane infrastructure in the city and that bus services can be too expensive for deprived communities. A number of respondents stated that Northern Ireland is a rural region and there is a high dependence on the private car for travel with public transport services not providing an adequate alternative.
- Belfast Chamber Trade and Commerce (BCTC) outlined a cautious approach stating that the LDP should not unfairly discriminate against or neglect the car user prior to significant improvements in the city's public transport system.
- Pump priming public transport infrastructure through developer contributions was suggested to ensure that travel by bus or rail is an option in the early stages of a development to establish sustainable travel habits.
- The importance of improving access for people who do not have access to a car was raised and ensuring that services and associated transport facilities are accessible by all.
- There was support for greater emphasis on the potential for improvements to rail services and the need for new rail halts to service the Ulster University at York Street and George Best Belfast City Airport. The promotion of Park and Ride services outside the council area was also supported.
- Neighbouring authorities welcomed our approach and called for further consideration of cross boundary issues which is welcomed.

**Our response**

- We welcome the support for the preferred option for public transport. The approach is in line with the SPPS with the emphasis on the need to integrate transportation and land use.
- We recognise the potential of rail services in improving accessibility and promoting sustainable patterns of travel and transport and will give it further consideration.
- It is noted that further consideration should be given to the transportation options in conjunction with GR1 - Housing and economic option and further discussion of land use allocations and associated transport infrastructure is needed with the DfI.
- We recognise that new transport schemes, walking and cycling; disused transport routes, car parking; and protected routes as well as other transport issues are important considerations for the next stage of Plan preparation and will work closely with DfI as well as neighbouring authorities on these issues.
- We acknowledge that investment in public transport infrastructure and sustainable modes is necessary if car dependency is to be reduced. We work jointly with DfI on the review of the Belfast Metropolitan Transport Plan to ensure the successful integration of transport and land use planning going forward.

**7.6 SCR6 - Highway network****We proposed**

The plan should protect land required for new road or road improvement schemes as identified as essential by the DfI and provide design guidance to ensure wider benefits to the surrounding areas through improved connectivity and regeneration benefits.

**You said**

- The preferred option for the Highway Network attracted various comments ranging from:
  - the need to reduce the impact of road infrastructure on inner city neighbourhoods;
  - new policy and measures to significantly reduce private car transportation;
  - the need to expand the highway network to support future growth;
  - better traffic management; and
  - the need to reduce congestion by improving public transport provision.
- The DfI called for greater clarity on direction of policy on provision of new highway capacity. Transport NI agreed with the approach to protect land required for new or road improvements schemes as identified as essential by the Department.
- The need to integrate road schemes with the surrounding land, minimise land requirements and reduce barriers to non-motorised transport was highlighted with an emphasis on dealing with vacant spaces that surround the city core.



## Smart connected resilient place

### Our response

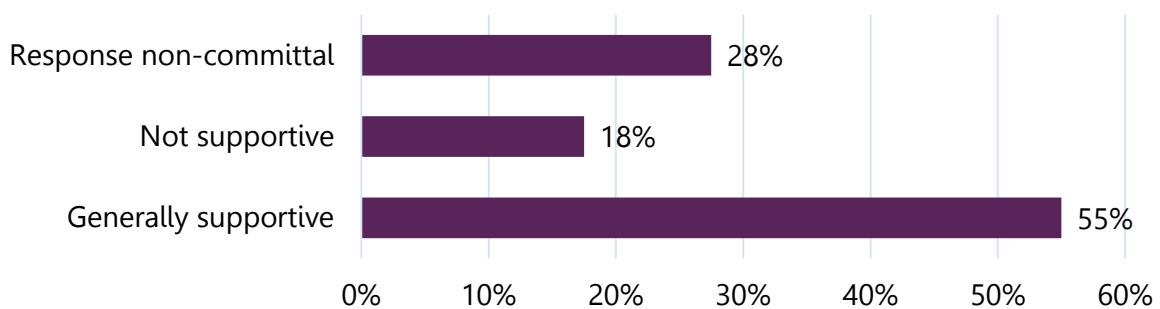
- The general comments relating to the highway network show that it can be a highly divisive issue with respondents either requesting that car access should be curtailed in the city or that it should not be restricted.
- Our approach is to deliver a balanced approach to transport with the recognition that vehicle access to the city in suitable amounts is necessary for the city to function as well as to ensure accessibility for all. The SPPS advises that councils should identify and protect sites and routes that could be critical in developing infrastructure where there is robust evidence to widen transport choice.
- Our approach recognises the impact of road schemes on the adjoining residential areas and outlines an enhanced approach of providing design guidance to ensure wider benefits to the surrounding areas.
- For clarification our approach is in line the regional strategic objective to promote sustainable patterns of development and facilitate travel by public transport in preference to the private car. The LDP will emphasise the need to integrate transportation and land use to maximise development around sustainable transport networks.
- The successful integration of transport and land use is a key principle in our approach and we are committed to working closely with the DfI on the review of the Belfast Metropolitan Transport Plan.

## 7.7 SCR7 - Parking demand management

### We proposed

To consider revised local parking standards to include guidelines to allow a flexible approach to be applied and to encourage the use of more sustainable modes of transport. The plan will ensure adequate provision for parking in new developments including provision for disabled and family friendly spaces. The plan will include provision for designating areas of parking restraint and managing the provision of long term parking spaces.

### You said



- A number of respondents were generally supportive of the approach to parking demand management. Comments included the following requests:
  - the need to restrict car parking in the city centre;
  - the impact of commuter parking in residential areas and the need to implement residential parking schemes;
  - the need to increase Park and Ride capacity on rail and bus routes; and
  - a focus on pedestrian and public transport access to city centre.
- Similar, to SCR6, the preferred option for parking demand management raised some issues of concern:
  - the need to ensure Belfast will not become inaccessible due to parking management policies and penalising car users;
  - the cost of car parking in the city centre is considered too expensive;
  - the need for parking provision for disabled people generally and not just in new developments; and
  - the need for more multi storey parking provision at sporting and entertainment venues.
- The Housing Executive supports a flexible approach to parking standards set out in policy SCR7 - Parking demand management. Due to the lower levels of car ownership amongst social housing tenants, they support a flexible approach to car parking standards, for social housing schemes.
- A number of respondents commented on the issue of commuter parking on inner city neighbourhoods causing a range of environmental, social and health problems for inner city residents. The need to introduce Resident's Parking schemes and parking management strategies was seen as a priority in the short term in order to manage any future growing population of the city and creating additional jobs.

### Our response

- We recognise there is currently a high volume of commuters travelling by car to Belfast which is leading to problems of increasing congestion and associated emissions resulting in poor air quality in a number of areas in the city. It is recognised that there is limited capacity in the city's highway network and therefore the promotion of public transport along with the appropriate provision for cars as part of a balanced approach is outlined in the preferred options paper. The use of parking policies that will assist in reducing reliance on the private car and help tackle congestion is a key part of the approach.
- The impact of commuter parking on inner city residential areas is recognised as a major problem and identified as a priority to address in our Draft Car Parking Strategy. It is proposed that we work closely with the DfI to carry out parking studies as part of the review of the Belfast Metropolitan Transport Plan.

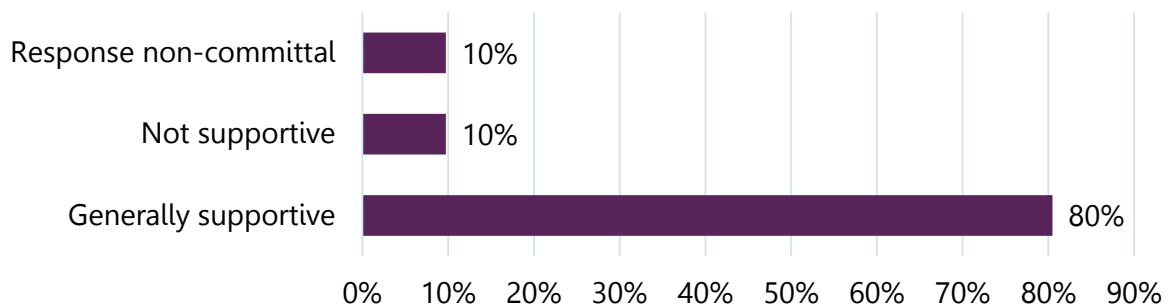


## 7.8 SCR8 - Environmental quality

### We proposed

To enhance environmental quality, where possible, and protect communities from materially harmful development. To consider issues of environmental quality related to ground contamination, air quality, noise and light pollution to ensure that amenity for end users is protected.

### You said



- 80% of respondents were generally supportive of the approach to enhancing Environmental quality.
- The most frequent reasons cited for supporting environmental quality were:
  - increase green areas with provision of more trees;
  - to further enhance Belfast's physical environment;
  - to reduce vehicle trips and promote sustainable travel;
  - to improve air quality 'for vulnerable groups by reducing air pollution through provisions of sustainable transport and compact walkable neighbourhoods';
  - to reduce air pollution by providing local communities with local services, and;
  - to ensure development contribute to environmental quality, and increase amenity from both environmental and human perspectives.
- A number of the statements of support came with caveats, for example:
  - air quality and congestion cited as major problems;
  - option requires more ambition;
  - environmental legislation should be utilized effectively;
  - transport infrastructure lacks resilience, and;
  - issue of flooding.
- A number of local residents raised questions around:
  - the need to create more green spaces and additional need for landscaping and trees; and
  - communities should be protected from materially harmful development.
- Statutory partners focussed on the need to recognise water quality and meeting WFD objectives.



## Our response

- We welcome strong support given to the preferred option.
- We welcome the support for the following:
  - active travel and green networks initiatives;
  - general support for renewable energy and energy conservation; and
  - reduction in greenhouse gas emissions deliver through sustainable transport.
- The LDP will aim to promote the growth of the city where people will live and work, with enhances green infrastructure to improve environmental quality and connectivity for sustainable transport that will reduce the number of car journeys in the urban area.
- The LDP will seek to encourage improvement in environmental quality as a result of new development.
- This will also include remediation of contaminated land as part of redevelopment.
- We also note the support for need for improved transport infrastructure provision and how this will bring about increased resilience and health benefits for all.
- The Council recognises that the quality of the physical environment is vitally important for health and biodiversity.
- We recognise the important role that LDP has in preventing both new and existing development from contributing to or being put at risk from unacceptable levels of contamination, air, noise and light pollution.
- We will aim to safeguard and, where possible, enhance the quality of the city's environment as this will be a key part of achieving the LDP vision for Belfast.
- We will play a key part in continuing to meet the commitments under the WFD and obligations under other environmental legislation.
- We are also represented on the Living with Water Programme Board we will continue to participate to play our part in the promotion and management of water quality, waste and water treatment.
- The LDP can seek to shape the physical environment to improve accessibility, such as ensuring key employment locations and residential developments are accessible by a range of sustainable transport options, including walking and cycling.
- The Belfast Agenda recognises the need for everyone in Belfast to experience good health and wellbeing as one of the key priorities for the city. This will complement the delivery of the LDP through the delivery of a range of programmes and services to improve our environment, improve infrastructure to support environmental quality.
- A robust evidence base is required to underpin all decisions in relation to the new LDP and is one of the key soundness tests that the Plan Strategy and Local Policies Plan must pass before being adopted.

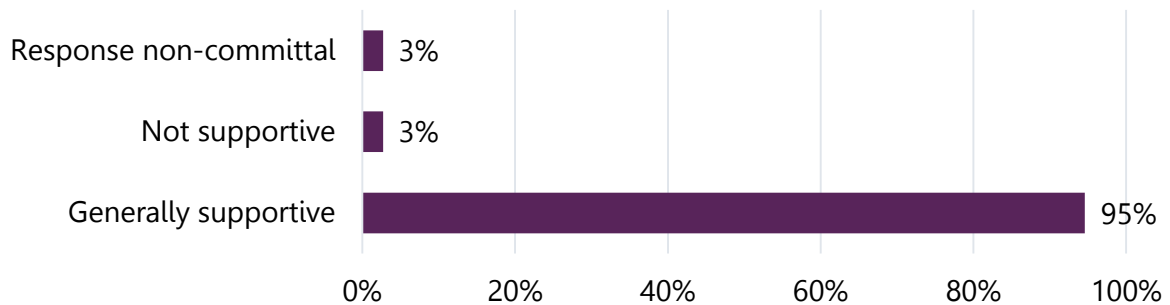


## 7.9 SCR9 - Mitigating environmental change

### We proposed

To reduce greenhouse gas emissions, the plan will facilitate the development of clean technologies, and sustainable design to help reduce greenhouse gas emissions, and ensure sustainable development.

### You said



- 95% of respondents were generally supportive of our preferred option to mitigate environmental change and the need to encourage the reduction of greenhouse gas emissions to improve air quality.
- The most frequent reasons cited for were:
  - leading the way in reducing green gas emission;
  - learning from other European World Health Organisation cities and elsewhere;
  - a low carbon city like Bristol;
  - a well-designed city with more opportunities for walking, cycling and public transport;
  - future proof new developments;
  - use of renewable energy;
  - clean technologies, sustainability at the heart; and
  - increased biodiversity.
- A number of the statements of support came with caveats:
  - concerns over the poor underfunding and under planned infrastructure; lack of resilience of our road network; reliance on fossil fuels; recognition of ecosystem services; city at sea level must do more, flooding.
- Questions were raised over:
  - Sustainable design
  - Principles of urbanism.
  - Concern over the council Air Quality Plan.
- Statutory partners welcomed further discussion and continuing to work with us to build environmental resilience.
- They also commented on the need to widen the scope of the option in order to meet government targets in mitigating and reducing environmental change.

### Our response

- We welcome strong support given to the preferred option.
- In particular, for the following:
  - sustainable active travel and green networks initiatives.
  - renewable energy and energy conservation.
  - Reduction in greenhouse gas emissions.
- We recognise the support for the need for a low carbon city which will deliver economic, environmental and health benefits across the city and with Belfast leading the way.
- Support for the need for new developments to be future proofed with the use of renewable energy, sustainability at the heart
- We recognise the support to explore renewable and clean technologies and care will be taken over the location for these to meeting the aims of LDP not only creating a healthier city and city's ambition to be a global one.
- Belfast is part of the '100 Resilient Cities Movement' which help cities around the world to become more resilient to the physical, social and economic challenges of the 21st Century. We can learn from elsewhere, which offers Belfast the opportunity to develop state of the art solutions to local challenges. To enable us to contribute to healthy people and communities as well as healthy environments
- The LDP will aim to meet the obligations and requirements set out in Climate Change legislation which establishes the UK target. to reduce carbon emissions ,the NI Executives Strategic Energy Framework (SEF), RDS and SPPS focus on the need to combat climate change.
- The Council already works closely with Rivers Agency to build environmental resilience and looks forward to working with other statutory bodies in making Belfast a smart, connected and resilient place.
- The LDP will aim to promote the growth of the city where people will live and work, with enhances green infrastructure to improve environmental quality and connectivity for sustainable transport that will reduce the number of car journeys in the urban area.
- We also note the support for need for improved transport infrastructure provision and how this will bring about increased resilience and health benefits for all.
- The Council recognises that the quality of the physical environment is vitally important for health and biodiversity.
- We recognise the important role that LDP has in creating a sustainable development approach to mitigate and adapt to the environmental challenges affecting the city.
- The Council will aim to safeguard and , where possible , enhance the quality of the city's environment will be a key part of achieving the LDP vision.
- The LDP can seek to create a compact city, designing in neighbourhoods, with local amenities and services, increasing opportunities for walking, cycling or taking public transport and to reduce the need to use the car. .
- The Belfast Agenda recognises the need for everyone in Belfast to experience good health and wellbeing



## Smart connected resilient place

and the desire for a connected, attractive and environmentally friendly city. This will complement the delivery of the LDP through the delivery of a range of programmes and services to

improve our environment, improve infrastructure to support environmental quality and reduce greenhouse gas emissions.

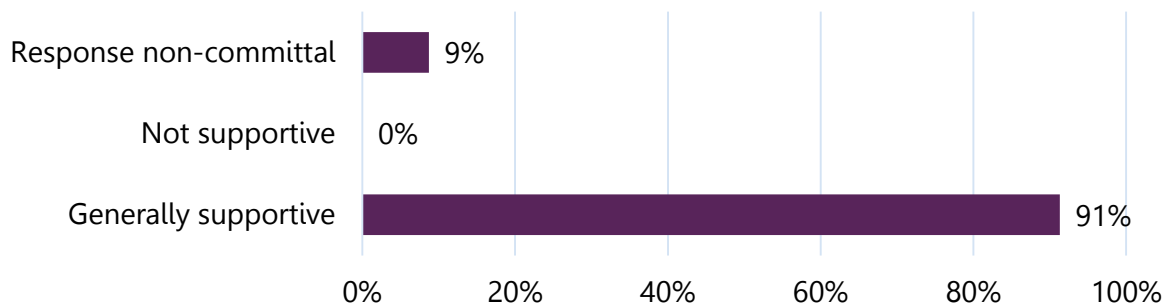
## 7.10 SCR10 - Renewable energy

### We proposed

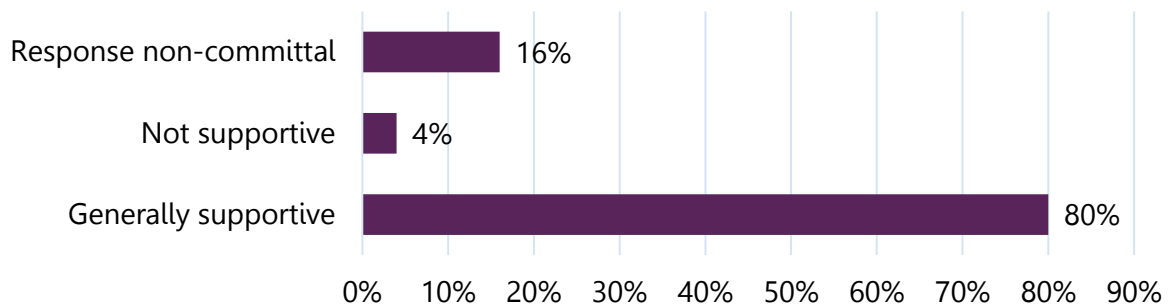
The LDP will review and revise the scope of the existing policies to facilitate the delivery of a planned, and integrated renewable energy generation supply appropriate for the urban area.

### You said

We asked to what extent you agree that we should promote the delivery of a planned and integrated renewable energy generation supply.



We also asked if you support policies for community energy generation schemes.



- The positive basis outlined in the preferred option for renewable energy was generally welcomed. The role that renewable energy presents in the transition to a low-carbon economy; promoting energy sustainability and improving security of supply was recognised. Further benefits including improvements in air quality; the provision of a significant economic boost through job creation, technology innovation and commercial rates; and the potential to attract attraction of foreign direct investment are recognised.
- The issue that certain forms of renewable energy, e.g. biomass, could have the potential to negatively affect air quality was raised.

**Our response**

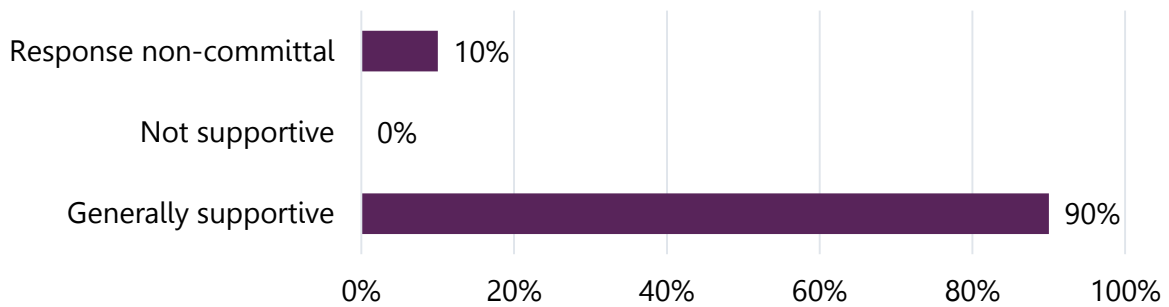
- We welcome the support given to the preferred option for renewable energy. The use of renewable energy sources is widely supported by government policy and the LDP will seek to facilitate the siting of renewable energy generating facilities in appropriate locations.
- The LDP will ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed and ensure adequate protection of the city’s built, natural, and cultural heritage features.
- The approach will also facilitate the integration of renewable energy technology into the design, siting and layout of new development. The opportunities to widen the policy to proactively encourage the retrofit of renewable technologies in the city will be given further consideration.

**7.11 SCR11 - Adapting to environmental change**

**We proposed**

To facilitate the incorporation of adaptation measures to adapt to environmental changes, which will support a resilient city that protects communities, biodiversity, the built and natural environment.

**You said**



- 90% of respondents to this particular option supported our proposed approach to adapting to environmental change in the new LDP.
- There was recognition for the need for Belfast to become resilient over the long term and that this would be addressed throughout the LDP.
- Questions were raised over the option:
  - adaptation to environmental change needs to be covered within all the of the policies in the Plan Strategy.
- A number of the statements of support came with caveats:
  - need resilient infrastructure that protects people, businesses and the environment;
  - climate change affects the long term weather patterns and will affect the flooding problems;



## Smart connected resilient place

- need to adopt the precautionary approach to be used in the assessment of flood risk;
  - flood risk from rivers, the sea, surface water and controlled reservoirs;
  - adherence to policy; and
  - review of ecosystems services.
- Statutory partners welcomed further discussion and continuing to work with us to build environmental resilience especially in the areas of flood risk.
  - They also commented on the need to adhere to existing planning policy and environmental legislation.

### Our response

- We welcome the strong support given to the preferred option
  - We also welcome support for measures that will aim to make Belfast more resilient to the effects of climate change and will be covered thoroughly throughout the plan in a multi-faceted approach.
  - The option will be further developed at the Plan Strategy stage within the LDP and it is noted that there is a need for cross referencing and reflection throughout the whole plan. This will ensure that there is more clarity and ambiguity over how the plan will tackle adaptation to environmental change.
  - The Council will ensure that any future policies will have regard to the relevant planning policies such as the RDS, SPPS and any other relevant documentation.
  - The council welcomes the support given from Rivers Agency and will continue to work to build environmental resilience in relation to Flooding.
  - The council notes the comments in relation to need to consider flood risk from rivers, the sea, surface water and Controlled Reservoirs as defined by the Reservoirs Act (Northern Ireland) 2015.
- The SEA process will ensure that for the plan will be take into consideration all the environmental, social and economic elements of the preferred options
  - The LDP will aim to promote the growth of the city where people will live and work, with enhances green infrastructure to improve environmental quality and connectivity for sustainable transport that will reduce the number of car journeys in the urban area.
  - We recognise the important role that LDP has in creating a multi-faceted approach to tackling environmental change that helps build a resilient city.
  - The Council will aim to safeguard and, where possible, enhance the quality of the city's environment will be a key part of achieving the LDP vision.
  - The Belfast Agenda recognises the need for everyone in Belfast to experience good health and wellbeing improve our environment, improve infrastructure to tackle environmental change
  - A robust evidence base is required to underpin all decisions in relation to the new LDP and is one of the key soundness tests that the Plan Strategy and Local Policies Plan must pass before being adopted.

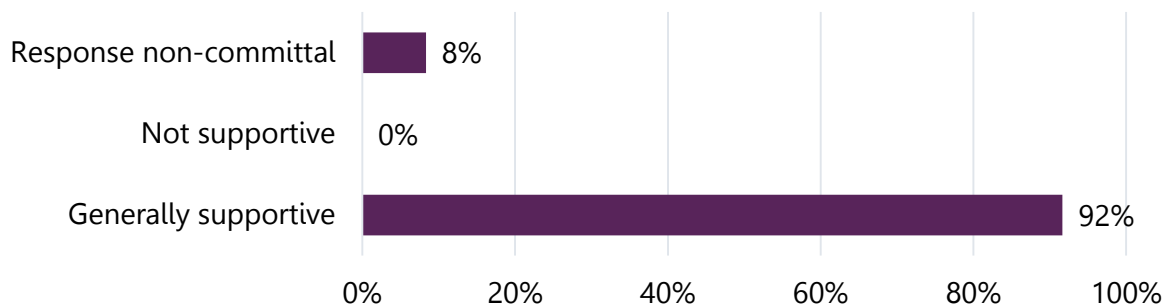
## 7.12 SCR12 - Flood risk

### We proposed

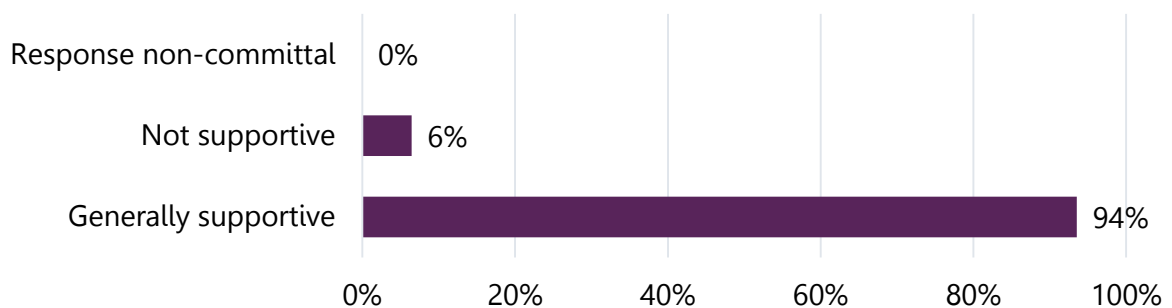
To review the scope of existing policy to focus on the management of potential flood risk in the urban area. This will consider the potential for supplementary guidance on how to incorporate flood mitigation measures, such as SuDS appropriate for the urban environment.

### You said

#### Measures to manage flood risk, such as green and blue infrastructure and SuDS



#### Drainage assessment requirement for new residential development within flood risk areas



- Majority of respondents supported our proposed approach to flood risk. 92 per cent of respondents supported the proposal and 8 per cent were non-committal.
- There was recognition for the need for Belfast to become resilient over The vast majority of respondents to this particular option supported our proposed approach to the range of measures proposed to manage potential flood risk within the plan areas, such as green and blue infrastructure and the development of SuDS in the LDP.
- 94 per cent support for a drainage assessment to be provided for all new residential development within potential flood risk areas.
- Some respondents said it should be for all new development to be assessed for flood risk not just residential schemes.
- Development in proximity to reservoirs.
- The main reasons cited were:



## Smart connected resilient place

- a flood risk reduction improves the lives of homeowners;
- recommendation for all local council areas to become champions for SuDs and take a lead role;
- need to restrict development in flood risk areas;
- support for SuDs; and
- benefits of flood risk management.
- A number of the statements of support came with caveats:
  - restrict building in flood plains;
  - all local plans should commit to SuDs for residential and commercial development;
  - welcome reference to climate change and blue and green infrastructure;
  - consideration of coastal flooding;
  - address flood risk at feasibility, design and construction stages of schemes;
  - needs to go further in addressing flood risk management and the promotion of a sustainable approach;
- need to link to water quality;
- issue of sea level and sea water;
- presumption against culverting and canalisation of watercourse; and
- natural flood plains' and natural watercourse should be retained and restored.
- Statutory partners welcomed further discussion and continuing to work with us to build environmental resilience especially in the areas of flood risk. They also commented on the:
  - need to adhere to existing planning policy statement 15 (PPS 15) and environmental legislation;
  - need to consider flooding from all sources, the sea, rivers, surface water and controlled reservoirs
  - higher priority for dealing with coastal flood risk.

### Our response

- We welcome the strong support given to the preferred option
- We welcome support for measures proposed to manage potential flood risk within the plan area and also the need to require a drainage assessment to be provided for all new residential developments within flood risk areas
- We will have regard to the SPPS regional Strategic Policy, prevailing PPS 15 and Long-Term Water Strategy for Northern Ireland, WFD and the Floods Directive.
- Recognise the need to work with other statutory bodies and other professional bodies in the development of flood risk management to facilitate the preparation in the LDP SuDs in NI.
- Recognise that SuDs can positively impact on water quality, quantity and amenity value biodiversity for the surrounding area, reducing combined sewer overflow and flood risk.
- Note the recommendation to address flood risk at feasibility, design and construction stages of schemes
- We recognise the benefits of flood mitigation measures and flood relief schemes. As well as the opportunity to bring previously flooded lands into



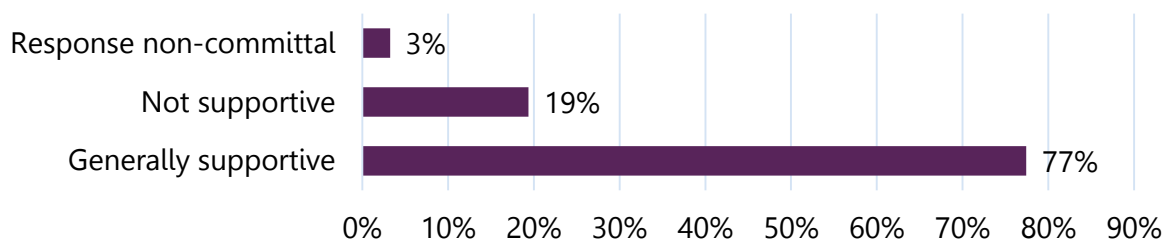
- amenity use such as the Connswater flood alleviation scheme.
- We will ensure that any future policies will have regard to the relevant planning policies such as the RDS, SPPS and any other relevant documentation.
- We welcome the support given from Rivers Agency and will continue to work to build environmental resilience in relation to flooding.
- We note the comments in relation to need to consider flood risk from rivers, the sea, surface water and Controlled Reservoirs as defined by the Reservoirs Act (Northern Ireland) 2015.
- The LDP will take a strategic approach to flood risk by considering the River Lagan catchment area as a whole, and will promote SuDs within all elements of design to ensure a proactive approach to flooding.
- We welcome the support for drainage assessments for developments in particular recognise their important role and give further consideration.
- A robust evidence base is required to underpin all decisions in relation to the new LDP and is one of the key soundness tests that the Plan Strategy and Local Policies Plan must pass before being adopted.

### 7.13 SCR13 - Waste infrastructure

#### We proposed

The LDP should facilitate the development of new infrastructure in appropriate locations or an upgrade of existing facilities to increase resource efficiency and enable a shift towards a circular economy as well as have regard to the proximity principle. The plan will ensure that appropriate provision is made for the storage of waste recycling containers in all new development schemes to maintain a high quality environment.

#### You said



- A majority of respondents supported the proposed approach to sustainable waste management throughout the city.
- The acknowledgement of waste as a resource was welcomed as well as the recognition of the circular economy. The economic potential of the circular economy was highlighted with clear support to prioritise a reduction and reuse approach to waste management.
- It was suggested that the LDP should set clear policies on appropriate locations for any new waste infrastructure including energy from waste facilities.
- A number of respondents called for improved recycling amenities in the



## Smart connected resilient place

city and more regular bin collections. The issue of euro bins and tipping in entries in particular in areas with a

concentration of HMO's in the city was raised.

### Our response

- We welcome the support to our approach to sustainable waste management throughout the city.
- Future waste management facilities will be considered through the council's Waste Management Plan and

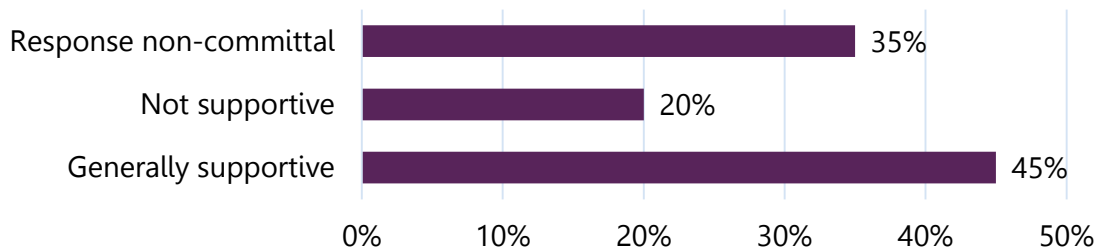
the LDP will take account of the locational criteria as set out in the SPPS. The LDP will also identify the need for appropriate facilities within new development.

## 7.14 Minerals

### We proposed

Is there anything within the existing approach to minerals you would like to see amended?

### You said



- The preferred option for minerals should be to adopt the sustainable development approach that strikes a balance between the economic benefits of mineral development and the need to protect the environment.
- It was noted that the minerals industry makes a contribution to the local economy through the supply of raw materials and the provision of jobs. In considering the need for a local supply of aggregate materials for the construction industry, it is important for us to consider as part of the plan strategy, a Joint Mineral Plan with surrounding council areas. This would ensure supply from other council areas to meet Belfast development demand.
- Existing policy aims to protect known mineral reserves from surface development that might prevent their future extraction, is considered appropriate. The existing MIN3, as updated by the SPPS, is the appropriate policy for delineating Areas of Mineral Constraint where mineral development would not generally be suitable.
- The LDP should consider and include policies for:
  - Groundwater, both as a water asset and its role in flood risk mitigation.
  - Potential for shallow geothermal energy through ground source heat pump to reduce greenhouse gas emissions and to increase the

- use of low carbon energy resources to help meet heating and cooling needs within Belfast.
- Exploitation of unconventional hydrocarbon extraction should not be permitted in Belfast until there is sufficient evidence on all environmental impacts.
- Protection of peatlands.
- Review of old minerals planning consents
- Consideration be given to providing a framework for the restoration of quarries to provide benefits for biodiversity, habitats and local people.

**Our response**

- We welcome the support and the views concerning mineral exploration and the environmental effects.
- We recognise that there needs to be a balance between the economic benefits of mineral development and the need to protect the environment.
- Recognition that any future policy wording should provide sufficient protection to the natural environment as required by the RDS, SPPS and PPS 2 and the Habitats Directive.
- We recognise the support and need for sustainable restoration of minerals sites that can help to support biodiversity and provide community benefits for recreation.
- We are required to co-operate with adjacent councils in the preparation of the Plan Strategy. We are seeking to establish a Sub-Regional Group to address strategic issues with the adjoining authorities and the need for a Joint Mineral Plan could be linked to the work of the Sub-Regional Group.

- quarry owners should be required to prepare a Restoration Plan. The approach should be focused on improving habitat as oppose to restoring land.
- Protection of the visual sensitivity of the Belfast hills and the historic environment assets, particularly previously unrecorded archaeological remains to mineral extraction enterprises. Conversely certain quarries are an important supply of natural stone used for repairing historic buildings.

- The next formal stage is the Plan Strategy which will include the detailed policies that will form the basis of future planning decision making, and many of the issues and concerns raised will be addressed at this Plan Strategy stage.
- As part of the LDP preparation a Review of Minerals (ROMPs) will be considered.
- The LDP will be reviewing policies concerning the mitigation and adaption of environmental change. This will include measures to minimise flood risk within the river catchment area. We also recognise the role of peatlands to store carbon, and its contribution to reducing greenhouse gasses.



# | A green and active place



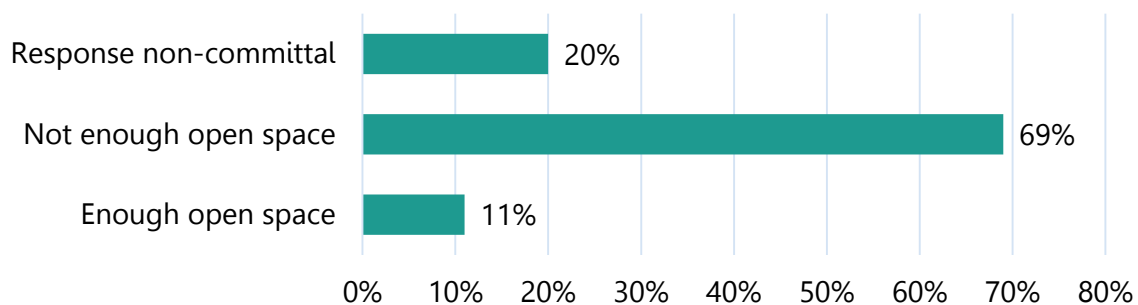


## 8.1 GA1 - Open space, sport and outdoor recreation

### We proposed

To continue the existing policy approach to the provision and protection of open space including community greenways, natural heritage areas, the Regional Park, Belfast Hills, green wedges, and linear green communal spaces, to support an integrated approach to green and blue infrastructure networks. The plan will also review and update policy in respect of the scale of proposal for which the provision of new communal space is a requirement.

### You said



- 69 per cent of respondents thought that there are not enough open spaces, etc. in Belfast, whereas 11 per cent thought that there was enough.
- The majority of respondents to this particular issue felt that there are not enough open spaces and recreational facilities in Belfast. While a number of people thought that there is enough, this tended to relate to their immediate area and not to the entire city.
- Many respondents thought that, in particular, there is not enough open or green space in the city centre and that a city centre park is needed. The Sirocco site is suggested by some respondents as an opportunity.
- There is strong support for more open spaces and leisure facilities, including a variety of uses such as pocket parks, greenways, sports clubs, leisure centres and playgrounds.
- Another key issue raised was better access for all to open spaces and greater connectivity between them. In particular, a number of respondents thought that all homes should be within a maximum distance to safe and accessible open space and play facilities.
- A frequent issue raised was the need for better accessibility for all of the population, including taking account of age, ability and special needs.
- A number of respondents thought that more could be made of important assets, such as the Belfast Hills, Lagan Valley Regional Park and waterways. In addition, some felt that existing parks and open spaces could be improved, with additional facilities and activities.
- Respondents noted the multi-benefits of open and green spaces, including for health, wildlife, landscape, etc.



## Green and active place

Reference was made to opportunities for new or meantime uses of vacant sites. A number also made suggestions for specific parks, facilities and sites. In addition, many respondents stressed the importance of consultation in designing new and

improved open space and recreation facilities.

- While a general protective approach was acknowledged, some respondents stated that limited release of open space may be appropriate in circumstances where the space is disused or obsolete.

### Our response

- We acknowledge the strong opinion that there are not enough open spaces and recreational facilities across the city and we recognise the important role that safe and convenient access to such facilities plays in creating sustainable, healthy and well communities.
- We also recognise the multiple benefits of our green and blue infrastructure network (including open space and outdoor recreational facilities) to the city, including in relation to biodiversity, landscape, air quality and flood risk.
- The LDP will seek to protect green and open spaces throughout the city and ensure that new development makes appropriate provision or contribution to new or improved facilities. The LDP will also incorporate proposals for an integrated 'green and blue infrastructure network' that includes connected green and open spaces. This will help to identify locations where opportunities exist to provide new and improved open space and linkages.
- We also note the general support for improved accessibility for all to open

space and recreational facilities, including the desire to have local facilities within easy reach of people's homes. Through the green and blue infrastructure network, we will seek to improve accessibility and connectivity to open spaces and recreational facilities across the city. In addition, working with our partners, we will seek to further protect valuable open space resources, such as the Belfast Hills and Lagan Valley Regional Park, including seeking ways to enhance accessibility and improve facilities.

- The LDP will continue a generally protective policy approach to open space and recreation facilities. However, it is recognised that there may be exceptional circumstances where the development of an area of open space may be acceptable, subject to a range of specific considerations. This will be taken into account in preparing the draft Plan Strategy policies.
- Where specific facilities and locations have been suggested for open space and recreation facilities, we will take account of these in preparing the Local Policies Plan.

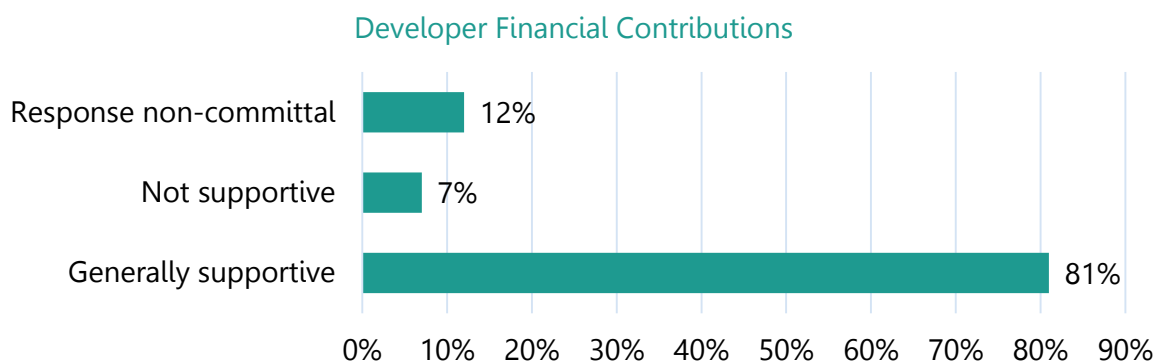
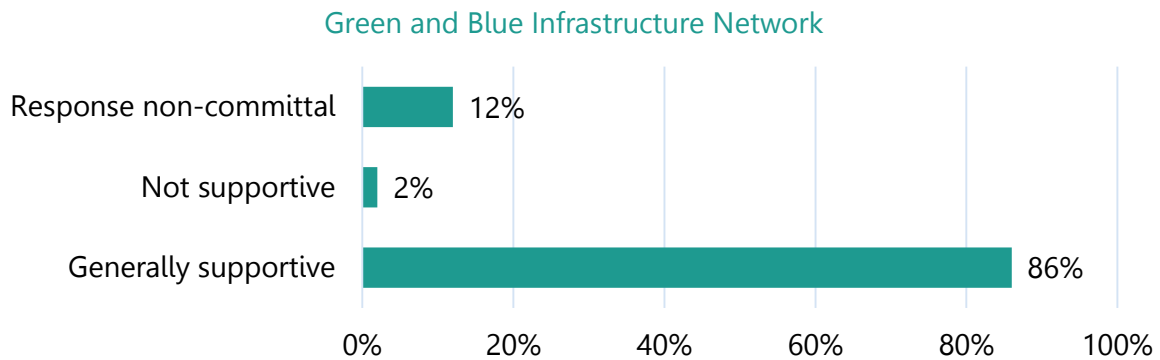


## 8.2 GA2 - Provision of new open space and green corridors

### We proposed

To provide guidance on where contributions may be appropriate to support the green and blue infrastructure networks located in proximity to the new residential development.

### You said



- 49 respondents answered the question on Green and Blue Infrastructure and 41 respondents answered the question on Developer Contributions. Respondents also provided additional comments on these matters. Overall, of those expressing an opinion, 86 per cent of respondents thought that the LDP should include proposals for a 'green and blue infrastructure network' and 81 per cent of respondents felt developer contributions should be sought. None of the respondents answering in the negative for either question indicated a reason for their response.
- The majority of respondents supported the development of an integrated 'green and blue infrastructure network' and also supported the proposal for financial contributions from developers towards this. The multiple benefits of an open space/green network were recognised, including health, natural heritage, active travel and air quality. Many see this as a quality of life issue that can help to inter-connect neighbourhoods and promote health and wellbeing.
- As with earlier questions on open space, many respondents expressed a need for new and improved open



## Green and active place

space, including better inter-connectivity between sites using, for example, new greenways and along waterways. One respondent commented that watercourses should not be culverted and should be preserved for nature and other benefits.

- Once again, some respondents thought that, in particular, there is not enough open or green space in the city centre. One respondent commented that all development should make room for open space unless there were exceptional circumstances.
- There is support for the development of an integrate network of sites and corridors with a range of functions. In particular, the potential for flood alleviation and incorporation of SuDs measures was highlighted. The need for a clear strategy or plan to direct

### Our response

- We welcome the support for the development of an integrated 'green and blue infrastructure network' and for financial contributions from developers towards this. We also recognise the multiple benefits of our green and blue infrastructure network to the city, including in relation to biodiversity, landscape, air quality and flood risk.
- The LDP will seek to improve existing open spaces throughout the city and ensure that new development makes appropriate provision or contribution to new or improved facilities. The proposals for an integrated 'green and blue infrastructure network' will help

investment and secure project delivery was raised.

- There was strong support for developer contributions to improve the quality of life in the localities that development occurs. There was also a suggestion that any funds raised should be spent both locally and strategically across the city. Some respondents noted that the viability of development projects should be taken into account and care should also be taken to ensure that planning permissions cannot be 'bought' by contributions.
- A number of respondents made suggestions for specific areas, facilities and sites in accordance with the follow-up question. Responses include improvements to particular parks, ancillary facilities at parks and greenways, new amenities at specific areas and greater use of heritage assets.

to identify locations where opportunities exist to provide new and improved open space and linkages.

- We acknowledge that measures to collect and spend developer contributions must be fair and transparent. In addition, we also recognise that contributions must take account of the nature, scale and location of the development and its financial viability. We intend to provide guidance on where contributions may be appropriate to support the green and blue infrastructure networks located in proximity to the new development.





- Where specific facilities and locations have been suggested for green and blue infrastructure measures and improvements, we will take account of

these in preparing the Local Policies Plan and any guidance for development contributions.

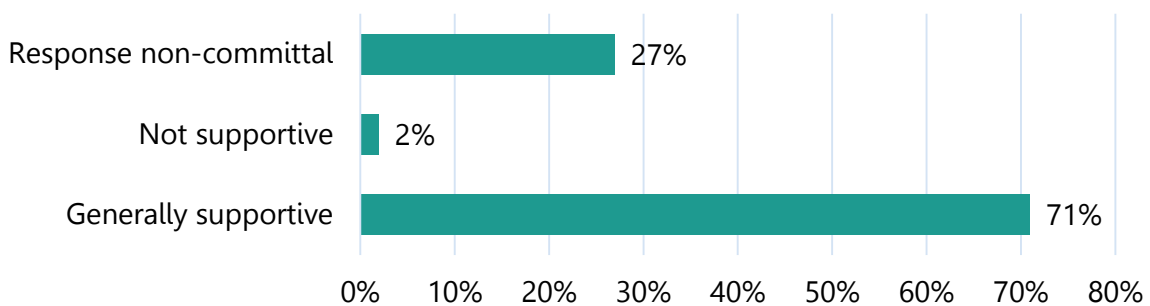
### 8.3 GA3 - Natural heritage

#### We proposed

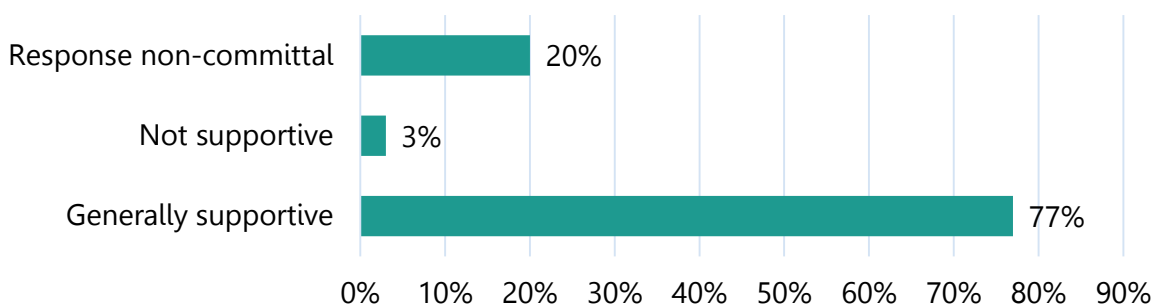
To review existing policy regarding local sites of nature conservation importance and consider the potential for the preparation of management plans and local design guides for designated areas such as AONB and Special Countryside Areas. The Local Development Plan will adopt a strategic approach to opportunities for green and blue infrastructure networks to help support biodiversity. It will establish policies to recognise the value of community greenways, natural heritage areas, open spaces, green wedges and linear, green open spaces, as part of integrated green and blue infrastructure networks.

#### You said

Proposed natural heritage approach



Management plans and design guides



- 49 respondents answered the question on the proposed natural heritage approach and 35 respondents answered the question on management plans and design guides. Respondents also provided additional comments on these

matters. Overall, of those expressing an opinion, 71 per cent of respondents agreed with the proposed approach to natural heritage and 77 per cent agreed with the preparation of management plan and design guides. There was one



## Green and active place

- negative response for each question from the same respondent.
- The majority of respondents supported the proposed approach to natural heritage as outlined in the POP. This includes the development of policies for designated nature conservation sites, other areas of natural interest and consideration of biodiversity improvement measures in the development of an integrated 'green and blue infrastructure network'.
  - The need to give appropriate and proportionate protection to sites and assets, taking account of their relative importance, was generally supported. It was noted that a balance requires to be struck between economic, social and environmental matters to secure sustainable development. Nevertheless, one respondent acknowledged the importance of natural heritage to the city's attractiveness for investment and quality of life.
  - The particular importance of the landscape setting of Belfast was raised by some respondents and there was a concern that the POP did not give adequate recognition to this. Specific reference was also made to the Lagan Valley Regional Park area, which is an AONB, and greater recognition of this was suggested.
  - The importance of urban fringe areas was also highlighted by a number of respondents and the need to adopt specific measures to tackle environmental degradation issues at the urban/rural interface.
  - A number of area/species-specific suggestions were also made, including the importance of urban landscape wedges, the Belfast Hill and all watercourses. In addition, it was suggested that the large number of local designations, such as Local Landscape Policy Areas (LLPAs) and Sites of Local Nature Conservation (SLNCIs). The importance of SLNCIs, should be reviewed as part of the LDP process.
  - Department of Agriculture, Environment and Rural Affairs (DAERA) reminded us of the need to consider marine policy documents and to consider water quality issues, particularly water ultimately flowing into Belfast Lough. One respondent also highlighted our obligations in protecting the natural environment and stated that there was a need for robust decision-making and strong enforcement.
  - The preparation of management plans and local design guides for designated important landscape and natural heritage areas was generally supported. It was noted that these should be used to promote high quality design whilst being robust enough to ensure that they are effective in protecting and conserving the natural heritage asset.
  - The respondent who did not agree with the proposed approaches in this matter stated that there was too much emphasis given to nature, rather than development to meet the population's needs. It also stated that the designation of important landscapes discriminates against landowners.



### Our response

- We welcome the support for the proposed approach to natural heritage as outlined in the POP.
- We recognise the multiple benefits of protecting and conserving our natural environment, including in terms of biodiversity, human health and quality of life. There is a need to give appropriate protection to natural assets, taking account of their relative importance. While it is acknowledged that the 'environment' is one of the three pillars of 'sustainable development' and that an appropriate balance has to be struck, the importance of city's natural heritage is also a key influence on the city's social and economic wellbeing. We do not, therefore, accept that environmental consideration is given too much weight in planning.
- In preparing the draft Plan Strategy, we will give all due consideration to its environmental and statutory obligations and powers to ensure appropriate protection and conservation of the natural environment, including the landscape setting of the city. We will also consider reviewing the local designations in preparing the Local Policies Plan, including a review of boundaries to ensure that they remain appropriate and necessary.
- The general support for the preparation of management plans and local design guides for designated important landscape and natural heritage areas is also welcomed and this will be further considered as part of the LDP process. In seeking to protect and enhance the natural environmental quality of designated areas, such plans and guidance will also give due regard to landowner's rights.

## 8.4 GA4 - Trees

### We proposed

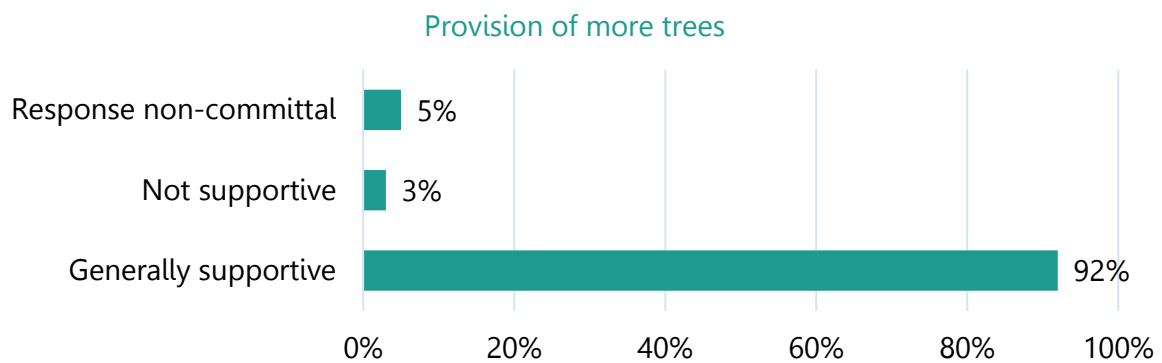
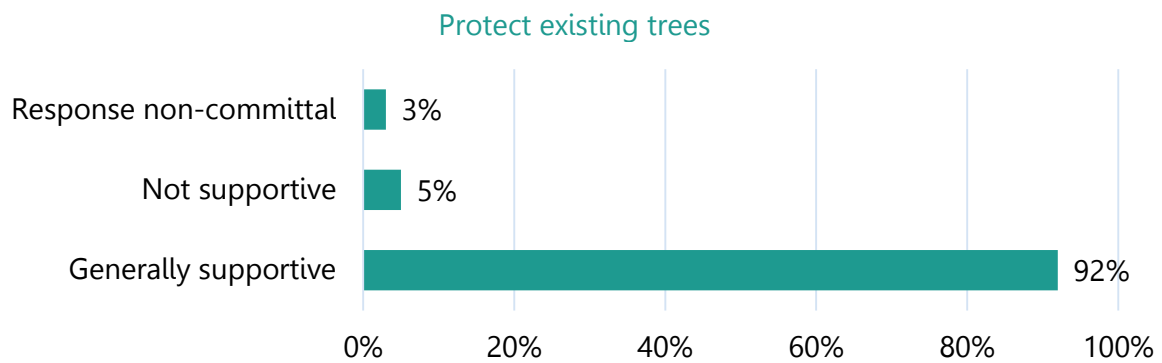
To protect existing trees and encourage further provision to offset unavoidable carbon emissions, reduce air pollution, provide shade and mitigate flood risks. This will be achieved by:

- adopting a precautionary approach to the net loss of trees;
- protecting trees from harm caused by development; and
- requiring proposals to consider the potential to plant new or replacement trees through either on or off-site provision.



## Green and active place

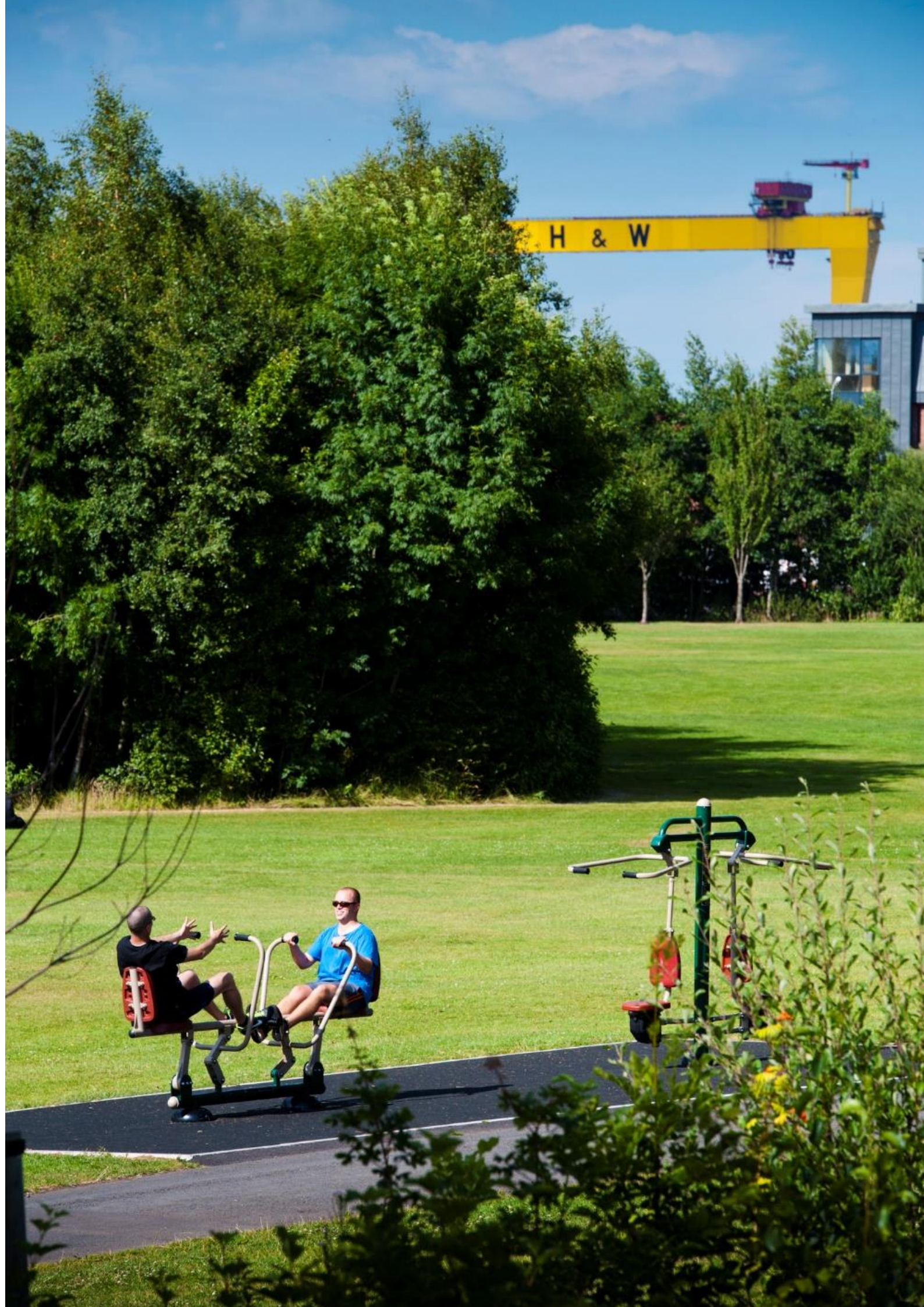
### You said



- The majority of respondents supported the proposed approach to tree protection and new tree planting.
  - 39 respondents answered each question. Respondents also provided additional comments on the issues.
  - Overall, of those expressing an opinion, 92 per cent of respondents agreed with protection of valuable and historic trees and 92 per cent agreed with provision of more trees.
  - The only negative response with a stated reason cited the importance of focusing on net gains in tree numbers rather than protecting all existing trees.
  - The multiple benefits of trees and woodland were recognised by a number of respondents: these include wildlife & biodiversity, visual amenity, health & wellbeing, urban cooling, carbon storage, shade and air quality.
- The particular value of tree sounds in the streetscape was also highlighted.
- There was general support to require trees in new development and seeking to ensure that existing trees are retained, where possible. Where tree removal is unavoidable, compensatory planting should be required. In addition, tree planting should form an integral part of the design process and care should be taken to ensure the appropriate species choice for the location.
  - One respondent suggested that all ancient/long-established woodlands and historic trees should be identified and protected – including as part of an area’s character.
  - DAERA supported the proposed approach, provided that the tree planting is appropriate and does not adversely affect any other natural heritage assets.

### Our response

- We welcome the general support for the proposed approach to trees as outlined in the POP.
- We recognise the multiple benefits of protecting existing trees and providing additional trees at appropriate locations across the city and surrounding areas. In particular, the benefits of trees to the natural environment and health and wellbeing is recognised.
- In preparing the draft Plan Strategy, consideration will be given to policies that seek to protect existing trees from development and seek a net gain in tree numbers. We will encourage careful consideration of existing and new trees in the urban design process and make appropriate use of our statutory powers to protect significant trees.



## 9. Other comments

### 9.1 Other issues raised

#### You said

In addition to the comments received in relation to the preferred options, as outlined in the previous chapters of this report, we also received a number of additional comments as part of the consultation process. A number of these could be deemed non-planning issues, such as comments:

- requesting reductions in the level of rates or rates exemptions;
- relating to bin collections and the management/collection of waste;
- street cleaning and littering;
- the general maintenance of existing buildings;
- relating to licensing laws and Sunday trading;
- highlighting the need for food banks; and
- problems with public transport.

However, there were also a number of other issues raised that, while not specific to the preferred options, provide useful information that will help to inform the preparation of the LDP moving forwards. For example, a number of respondents submitted topic based research papers to be reviewed as part of the evidence base to help inform the development of future policies.

Other comments related to the consultation process generally. Some respondents commended the POP on structure and the ease of use, while others felt the consultation documents were not user friendly and contained too much technical jargon. A large number of respondents requested further consultation with us as the LDP process progresses and requested forms of co-authorship of future policies.

"...the document is easy to read making it accessible to the public..." (DfI)

"In developing the LDP we suggest the council should consider how to make their process relevant and engaging, especially to inner city communities with little resources and multiple urban stresses."  
(Interest group)

"Where are the images and voices of the young people this will impact!"  
(Local resident)

A number of respondents also highlighted the need for specific engagement with young people, given that the plan projects forward to 2035, meaning that it is today's young people who are likely to be most impacted by policy decisions implemented now.

## Other Comments

### Our response

- Where comments have been received that are not of direct relevance to the LDP, we have sought to pass these on to relevant internal departments, where appropriate.
- In relation to comments on the consultation process, we have gone to great lengths as part of the consultation process to ensure that all sectors of society have been made aware of the consultation process and have been able to respond. This has included the preparation of a short, 'easy read', non-technical summary of the full POP report and a youth specific version of the POP.
- As outlined in section 2 of this report, our consultation process has included a series of area-based events, general awareness raising in public venues, a targeted exercise with young people and specific events with harder to reach groups.
- We strive to improve the engagement process and the comments and suggestions have all be noted and will help to inform future consultation exercises including those relating to the Plan Strategy and Local Policies Plan.

## 9.2 Site specific submissions

We received 14 submissions during the POP consultation period which contained proposals for specific sites within the plan area.

These site specific submissions will be taken into account in the next stages of the plan development process, but are of most relevance when we move onto the Local Policies Plan stage, following the adoption of the Plan Strategy. At that stage, sites proposed will be considered for zoning, where appropriate.

An Urban Capacity Study is currently being prepared which will consider the land available to accommodate the level of housing and employment growth proposed in the POP. It will inform the preparation of both the Plan Strategy and Local Policies Plan. Depending on its findings, we may issue a formal 'Call for Sites' at the Local Policies Plan stage, at which point the submissions received to the POP will also be taken into account.



## 10. Sustainability Appraisal (incorporating Strategic Environmental Assessment) (SA/SEA)

The Planning Act (Northern Ireland) 2011 requires us, under statutory duty, to undertake a SA incorporating SEA. SA/SEA is a tool for appraising policies to ensure they reflect sustainable development objectives (that is social, environmental and economic factors). This is required in relation to both development plan documents, the Plan Strategy and Local Policies Plan. The scope and the interim report of the SA/SEA was developed and consulted upon alongside the POP.

The SA/SEA process to date has involved two key stages:

- A **Scoping Report** was produced and subject to a five-week consultation period with the consultation body, NIEA and the HED between November and December 2016. Comments received during that period were reviewed and addressed as appropriate and were included within the Scoping Report and the SA Interim Report during the POP consultation.
- The **Interim Report** was developed in conjunction with the POP. It identified and evaluated the likely significant effects on the environment of implementing the plan. It considered the reasonable alternatives and the reasons for selecting the preferred options and the alternatives. It included a description of the assessment and any difficulties encountered in compiling the information. The Interim Report was developed to enable statutory authorities or other interested bodies to make comment and identify any significant gaps in the information gathered. An overview of the consultation process is set out below.

### 10.1 Consultation process

The SA/SEA consultation ran alongside the POP. The questionnaire was structured around six sections which reflected the layout of the Interim Report. This section of the report summarises the feedback received on the SA/SEA Interim Report and associated documents. The report follows the structure of themes of the questionnaire and provides an overview of the responses. As well as the key points, potential environmental impacts or concerns and suggestions for mitigating and monitoring these effects.

Two formal responses were received by email to the Interim Report from the consultation body and additional comments were received by DfI in their response to the overall POP.

### 10.1.1 Plans, policies and programmes review

#### You said

- A number of documents were suggested for inclusion such as:
- **International** – UNESCO Convention on the Protection of the Underwater Cultural Heritage (2001), The X'ian Declaration and the EU Adaption Strategy 2013.
- **National** – UK Climate Change Act 2008.
- **Regional** – Protection of Shipwrecks Act (1973); DAERA's Local Air Quality Management Policy Guidance; The Protection of Military Remains Act 1986; The Planning (Listed Buildings)

Regulations (Northern Ireland) 2015; The Protocol for the Care of the Government Historic Estate; Regeneration: The Value of our Built Heritage. Position Paper 2017; A Study of the Economic Value of Northern Ireland's Historic Environment; British Standard BS 7913:2013 Guide to the conservation of historic buildings; Historic Buildings and Energy Efficiency – A Guide to Part F of the Northern Ireland Building Regulations 2006.

#### Our response

- The above documents have been noted and will be included in future iterations of the Scoping Report and

the subsequent Environmental Reports which will be developed at each stage of the LDP process.

### 10.1.2 Baseline Information

#### You said

- The following key issues were raised by the consultation body to highlight or include into the baseline data:
  - **Water quality** - concerns were raised regarding the water environment in the plan area as all of the water bodies in the Belfast vicinity are failing to meet WFD objectives. It was noted, the LDP should recognise the need to protect and improve water quality which is also a Programme for Government indicator. It was also highlighted that waste water treatment in the city is under pressure and is potentially at capacity.

- **Air quality** – there were references to nitrogen dioxide levels on the A12 Westlink Corridor as being in breach of limit values in Air Quality Directive. Alongside this, under 'Climate Change', Northern Ireland emissions in 2014 fell to 20.3 MtCO<sub>2</sub>e<sup>56</sup>, a reduction of 17.4 per cent below the 1990 base year.
- **Housing** – clarity is sought on the number of vacant properties in Belfast. It is suggested due consideration must be given to the need for the number of new buildings when there is an opportunity to reuse existing listed

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

and non-listed vacant building stock.

- **Human health** – there was recognition of the important role which the historic environment, its individual assets and space has in promoting positive health benefits. As well as its contribution to the quality of the local landscape and those that are open provide an important recreational resource for physical activity may be considered for ‘Quiet Areas’.
- **Culture, leisure and recreation** – recommendations were made for further research in the accessibility of Historic Parks, Gardens and Demesnes in the city which could be potentially made open to the public, particularly those with significant open space and/or designated landscapes, or that are council owned assets eg graveyards.
- There were recommendations for sympathetic reuse of disused railway lines to expand the greenway network would encourage the restoration of former structures associated with the network.
- **Belfast Harbour** – there was a suggestion that further information is required regarding the sensitive and significant location of Belfast Harbour for regional maritime heritage. It was

noted that ‘any development in this area has the potential to affect the setting of listed buildings, scheduled monuments and industrial and maritime archaeology and would require a sympathetic heritage-led approach, with high quality design (in terms of scale, height, massing and alignment), detailing and materials in line with SPPS.

- **Tourism** – it is suggested that further reference to the role of the historic environment is explored.
- **Cultural and built heritage** – a recommendation was made on the use of ‘Historic Environment’ as a term in future documents. Further discussion is recommended around the legislative protection of listed buildings and should be identified according to their sub-classifications (Grade A, B etc). It was noted it may be possible to highlight some buildings that are now ‘saved’ from the Buildings at Risk Register Northern Ireland (BARNI) subject to owners’ permissions.
- **Areas of Townscape Character (ATC) and Areas of Village Character (AVC)** - consideration of designating new ATCs and AVCs would be welcome.
- **General** – include a glossary of terms.

### Our response

- We welcome the above suggestions for the baseline information and will update the Scoping Report and associated baseline evidence reports

as appropriate. The baseline information will be included in subsequent Environmental Report(s)

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

which will be completed at each stage of the LDP.

- A number of key documents including an Open Space Strategy and Urban Capacity Study have been commissioned to refine the baseline evidence specific to the plan area.

Additional to this, there are plans to undertake a Retail and Leisure Study. The NIHE have committed to develop a Housing Needs Assessment and Housing Market Analysis which may feed into the baseline.

### 10.1.3 Sustainability issues

#### You said

- It was suggested the following are considered as a sustainability issues:
  - **Housing** - The reuse of historic building stock.
  - **Education** - Nurturing of and training of traditional skills and using the historic environment as an educational resource.
  - **Population and human health (segregation)** - Fostering community pride and identity through conservation or regeneration of local heritage assets to discourage heritage crime and address problems associated with dilapidated or unsightly buildings/sites. Particularly those on the BARNI Register and other vacant listed and non-listed buildings.
  - **Climate change** - The reuse of existing historic architecture and infrastructure.
  - **Tourism** - Heritage assets in neglect and decay are a significant sustainability issue. There is an opportunity to seize the tourism potential of several underutilised heritage assets.
  - **Cultural and built heritage** - Heritage assets at risk from neglect or decay or development

pressure; there are a large number of vacant historic properties in Belfast; inappropriate development/enhancement/design which does not demonstrate an informed understanding of heritage assets and their settings (eg through having conducted adequate assessments or compiling conservation management plans); conserving and enhancing designated and non-designated assets and their settings; lack of awareness of the historic environment; heritage crime; permitted development; demolition or loss of heritage assets, prior to them being protected; traffic pollution and its impact on heritage assets; and tall buildings and their impact on the historic environment.

- **Landscape** - Areas where there is a risk of significant loss or erosion of landscape or townscape character or quality, or where development might have a significant impact on the historic environment and/or peoples' enjoyment of it.

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- Areas of Outstanding Natural Beauty – designation of 'Quiet

Areas' associated with some heritage assets.

### Our response

- We welcome feedback on the sustainability issues presented in the Interim Report and will consider the inclusion of the suggestions, as appropriate. It may be prudent to consider some suggestions as 'an

opportunity' to the LDP rather than an issue. The issues suggested may have already been raised in the Interim Report but may require revised wording.

## 10.1.4 Sustainability objectives

### You said

- A suggestion was put forward to reword the SA objective in relation to climate change to incorporate mitigation – 'Measures to mitigate

against the impact of climate change and support action to adapt to climate change'.

### Our response

- A suggestion was made to reword objective 19, 'Support the adaptation to climate change and effectively manage flood risk' to include mitigation. It is the view that both 'adaptation' and 'mitigation' be treated as two separate objectives for the purposes of SA. The issue of adaptation is currently referred to in objective 19 and mitigation is referenced in objective 10, 'Support the transition to a low carbon economy'.

- While, the wording around mitigation may not be immediately clear in objective 10, NIEA has since supported the proposal to reword this objective to read 'Support mitigation efforts to reduce greenhouse gas emissions and the transition to a low carbon economy'. It was also agreed to reorder the objectives so that both objectives relating to 'Climatic Factors' (mitigation and adaptation) sit together in the SA objectives table (Table 2 in the Interim Report).

## 10.1.5 Appraisal and assessment of reasonable alternative options

### You said

- The following feedback was received from the consultation body on the appraisal and assessment of reasonable alternatives.
- **General** - where any new development is concerned be it economic, renewable energy

infrastructure or housing, while in some cases there may be a positive effect for the historic environment, there is almost always also a significant potential for negative effects. For example, development in the setting of historic assets, historic

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- structures continue to decay or destruction of previously unidentified below ground archaeological remains. It was suggested it may be more appropriate to score the effects of such options as positive and negative or uncertain, rather than positive/neutral.
- Provision of green infrastructure could perhaps link in with active travel infrastructure (walking and cycling) thereby decreasing private car use and leading to reduction in air pollutant emissions.
  - It was noted the difficulty in scoring the policies at present as these have not been drafted.
  - **GR1 Supporting Economic Growth** - the preferred option will apply in further pressures on sewerage infrastructure. Possible mitigation could be achieved by better sewage treatment. The Living with Water Programme (LWWP) recognises that this will be challenging to achieve and no solutions have yet been identified. Further discussion is required with NI Water on headroom capacity within the Belfast WWTWs to treat this additional population equivalent and determine mitigation measures. Given that all Belfast water bodies are already failing WFD objectives and before the necessary infrastructure and mitigation measure are taken, could lead to further deterioration in water quality which may have significant negative effects.
  - The additional growth and housing proposed on brownfield sites could have a disproportionate adverse effect on the priority habitat, Open Mosaic Habitats in Previously Development Land (OMHPDL) which should be recognised and adequately mitigated.
- SA indicates that there are no significant negative or positive economic effects associated with option 2. This appears at odds with the justification in the Housing Growth Options Report and indeed the rationale for the desired approach to growth set out in the POP.
  - **LP1 Accommodating new homes** - new homes could potentially put further pressures on the water environment and there is not a clear understanding about how the additional sewage will be treated and to avoid any further deterioration in water quality.
  - **LP7 Quality design in residential developments** - Under design mitigation, green infrastructure with SuDS could be included within designs. There is consideration of a potential relationship between quality design and the SA objective 17 'Promote the quality, efficient use of water resources'.
  - **LP8 Promotion of health and wellbeing** - The appraisal of the options indicates that there are neither positive nor negative environmental effects from the options. However, if green infrastructure was used to connect open space and provide greater connectivity there is likely to be additional benefits for biodiversity, landscape and water quality and quantity if designed correctly.
  - Promotion of sustainable transport and cycling could have benefits for air quality.

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- **LP12 Arterial routes and gateways** - the promotion of a hierarchy of arterial routes could have air quality implications for more heavily used routes which should be considered and mitigated within any design guidance.
- **LP14 Tall buildings** - concerns of a combined negative effects of this option on the historic environment could set a negative precedent for future developments.
- Tall buildings can significantly change the local wind environment which could also be considered within a tall buildings policy.
- **LP15 Archaeology and built heritage** – It was strongly recommended that the policies in SPPS (through application in PPS 6) have a demonstrable track record of protecting the historic environment, its assets and settings effectively and in line with the requirements of international conventions on the protection of heritage to which the UK is a signatory. Supplementary local policy and guidance akin to that outlaid in PPS 6 could then flow from these. HED disagreed with Option 1, and said ‘utilising policies as outlaid in the SPPS would have a negative impact on the historic environment and believe that this scoring needs to be reviewed...as this would have a neutral or minor positive effect’.
- It was noted that Option 1 was scored negatively in several instances through the matrix and highlight that as this proposes implementation of policies as per SPPS, the effect should be neutral or minor positive. The policies in SPPS are similar to those contained in PPS 6. This is particularly so when the option is scored against objective 13, ‘Protect, conserve and enhance the historic environment, heritage assets and their setting’.
- It was highlighted that:
  - policies which help protect, conserve and enhance the historic environment could have a minor positive outcome in relation to objective 3, ‘To provide opportunity for good quality housing and enable people to meet their housing needs’ through reuse of vacant historic structures.
  - policies which protect the historic environment can be of minor positive effect in relation to objective 5, ‘To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities’, through the maintenance of historic environment assets and access to these.
  - the potential for positive minor effect in relation to objective 10, ‘Support the transition to a low carbon economy’. The historic environment is a carbon neutral resource with embodied energy. Through re-use of existing historic environment assets such as empty buildings a positive contribution can be made toward a low carbon economy.
  - Positive protection of the historic environment through the appropriate policies therefore has a minor positive impact in relation to objective 11, ‘Maintain and enhance biodiversity assets and protect habitats and species’.

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- policies which provide protection for historic environment assets such as historic parks, gardens and demesnes, Areas of Significant Archaeological Interest (ASAs) and sites, monuments, graveyards and buildings have a minor positive impact in relation to objective 15, 'Protect and enhance open space and natural greenspace including Belfast's countryside asset'.
- policy which protects historic environment assets has a minor positive impact, because of the assets' carbon neutral make up and embodied energy particularly in relation to objectives 18 ('Reduce air pollution and ensure continued improvements to air quality') and 19, ('Support the adaption to Climate Change and effectively manage flood risk').
- **LP16 Local distinctiveness** – Consideration to local landscapes and habitats can be described as important features of local character and distinctiveness which would benefit from a local policy.
- **VE2 Strategic employment locations** - The additional growth and housing proposed on brownfield sites could have a disproportionate adverse effect on the priority habitat, Open Mosaic Habitats in Previous Development Land (OMHPDL) which should be recognised and adequately mitigated.
- **VE8 Defining the city centre boundary** - Impacts on Belfast's cityscape from the policy options which should be considered in the subsequent LDP environmental reports and could be recognised in SA objective 14, 'Protect, maintain and enhance the quality of Belfast's distinctive landscape and geodiversity'.
- **VE10 Leisure and tourism in the city centre** - the selection of tourism sites has the potential to impact on biodiversity and landscape which should be considered in the subsequent LDP environmental reports.
- **VE13 Development opportunities** – There is the opportunity to further biodiversity and enhance landscape if there was a framework or plan for development sites.
- While the approach to the reuse of heritage buildings will be facilitated through site master-plans, there may also be negative outcomes in relation to development in the setting of heritage assets and proposed alterations to listed buildings, which shall only be realised on receipt of proposals. For this reason it is suggested scoring also as unknown.
- **SCR2 Water and sewerage infrastructure** - the incorporation of SuDS and the low carbon economy is welcomed. However, there is a failure to recognise that current infrastructure is at capacity and under increasing pressure.
- **SCR3 Electricity and gas infrastructure** – It was noted the micro-generation of energy does not necessarily have the same positive effects on air quality that it may have with regard to reducing greenhouse gas emissions.
- **SCR8 Environmental quality** - there was no mention of water quality, or meeting WFD objectives.
- **SCR11 Adapting to environmental change** - SuDS and green and blue



## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

infrastructure are welcomed. However, the document fails to make the link with improved water quality, which is a key benefit in addition to flood mitigation.

- **GA2 Provision of new open space and green corridors** - this is to be welcomed, and particularly the reference to integrating green and blue infrastructure, and making the links with biodiversity etc.
- **GA3 Natural heritage** - We consider that this policy could have a significant positive effect on SA objective 11, 'Maintain and enhance biodiversity assets and protect habitats and species' as it aims to improve linkage of sites as well as protecting existing areas of natural heritage interest.
- Policies that promote energy efficiency and sustainable travel, as well as reducing carbon emissions, can often benefit air quality also, for example, in options LP17 'Energy Efficient Design', VE5 'Network and

Hierarchy of Centres' and SCR6 'Highway Network'.

- DfI noted:
  - The preferred options for LP11, LP12 and LP13 does not appear to have examined the integral issues of transport and accessibility.
  - We should ensure that the justification for selecting the preferred Options includes cross referencing with the SA. This would provide additional objectivity and transparency to the process by linking decisions with the evidence used to justify our approach.
  - ensuring that the SA informs the development of policies will assist us in balancing and integrating the variety of complex social, economic and environmental matters that are in the long term public interest. This is fundamental to the achievement of sustainable development and ultimately will be important in demonstrating the plan soundness.

### Our response

- The feedback received from the consultation body will be reviewed and revised as appropriate with particular reference to the following points.
- The Environmental Report for the draft Plan Strategy will review the reasonable alternatives and associated scoring in Interim Report. The feedback received from the consultation body and interested parties will be taken on board as appropriate. The Scoping Report is an evolving document and the baseline data will be updated to reflect current situations and state of the environment including air quality, water quality and all the other SA/SEA topics.
- Ongoing research is being undertaken in relation to water quality and capacity issues.
- Further clarity will be sought from NIEA on the locations of OMHPDL, where it occurs, habitats and any other datasets.
- An Open Space Strategy has been commissioned to carry out an audit of green space in Belfast. Alongside this, a green and blue infrastructure

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

masterplan will be developed to explore solutions and the connectivity and relationships between green, blue and grey infrastructure. It could have the ability to provide opportunities for investment through potential Section 76 Developer Contributions. The benefits of both plans are multifaceted in providing linkages to green and blue space encouraging health and environmental benefits.

- Sites for tall buildings and tourism will be identified as part of the Local Policies Plan will be subject to SA
- The preferred options and reasonable alternatives have been subject to SA which involved consideration of the options against the SA Objectives. The SA objectives considered the integral issues of transport and accessibility within the following objectives:

- SA6. Retain and enhance access to local services and facilities
- SA7. To ensure local residents have access to employment opportunities
- SA9. Promote an integrated transport system and encourage sustainable travel
- Justification for bringing forward the preferred options is summarised in chapter 4 of the SA Interim Report and the scoring matrices of all preferred options and reasonable alternatives have been subject to SA. Consideration is also given to the mitigation measures that could reduce or offset the negative effects identified, including mitigation that may be provided by policies in the emerging plan.

### 10.1.6 Cumulative effects

#### You said

- Agreement with the assertion that the plan is likely to have a cumulative mixed minor positive and minor

negative effect on the historic environment.

#### Our response

- We note this comment.

### 10.1.7 Mitigation

#### You said

- The following recommendations were made:
  - LP7 Quality design in residential developments - Quality design in residential developments. Under design mitigation, green and blue infrastructure with SuDS could be included as it is important to

include it within designs to ensure it works.

- SCR11 Adapting to environmental change - SuDS and green and blue infrastructure are welcomed but explicit linkages are required with improved water quality, which is a key benefit in addition to flood mitigation.

## Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- Stronger references to the North Eastern River Basin Management Plan and specifically noting the Programme of measures contained within the North Eastern River Basin Management Planning (NERBMP) which provide for actions and mitigation against further deterioration in water quality in the Basin and the attainment of 'Good' water quality.

### Our response

- We note the suggestions on mitigation measures and will update the report as appropriate.

## 10.1.8 Monitoring

### You said

- Under SA Objective 13, 'Protect, conserve and enhance the historic environment, heritage assets and their settings', it was suggested to consider rewording the decision making criteria 'to encourage and support the articulation of statutory requirements in relation to Scheduled Historic Monuments Order (i.e. requirement for consent)'. It was noted the decision making criteria should not solely be about encouraging and supporting the articulation of statutory requirements in relation to the Order but also to consider the issue of cross compliance.
- DfI noted that further thought should be given to the types of sustainability indicators that would be required to monitor progress towards achieving objectives. This should also help with refining the objectives themselves'.

### Our response

- We note the suggestion regarding SA Objective 13 and will update the report as appropriate.
- In line with Schedule 2 (9) of the Environmental Assessment of Plans and Programmes (EAPP) (NI) 2014, a description of measures concerning monitoring in accordance with regulation 16 are presented in Chapter 6, Table 9 of the SA Interim Report. The table presents each SA objective alongside decision making criteria of which to assess each option (including reasonable alternatives) and a range of indicators (109) to enable clarity in the assessment process as to whether the LDP meets the SA objectives and to assess the long term effect on the environment of the implementation of the LDP.
- The 109 'Potential Indicators' in the SA framework include a potential source of data to be used for monitoring, most of which will be provided by external bodies. During the course of the LDP process, we will continue to work with statutory bodies to finalise and agree the relevant sustainability effects to be monitored.

### 10.1.9 Additional information

#### You said

- SA of Belfast LDP strategic objectives
  - It was suggested the compatibility of SA Objective 13, 'Protect, conserve and enhance the historic

environment, heritage assets and their settings' with the LDP objectives be revisited and the scoring reviewed.

#### Our response

- We will review the SA matrix of the Belfast LDP strategic objectives.

#### You said - carried forward policies

- DfI note, the PPS policies retained under transitional arrangements were not subject to SA. We will note that the act of incorporating this policy within a Local Development Plan may

mean that these provisions should also be the subject of SA/SEA. Failure to undertake SA of these elements may raise issues of soundness.

#### Our response - carried forward policies

- Any policy proposal including those from existing PPS will be integrated and assessed as part of the

subsequent environmental reports associated with the LDP process.

## 11. Rural Proofing

From 1 June 2017, under the Rural Needs Act NI (2016), councils are required to have due regard for and consciously consider the rural needs when developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services. The Act defines 'rural needs' as "the social and economic needs of rural areas"<sup>1</sup>.

The Rural Needs Act does not explicitly refer to or prescribe any specific process to be used by public authorities in having 'due regard to rural needs'. However, rural proofing is a process which is well established in Northern Ireland as a means of identifying rural needs and impacts, based on analysis of evidence; considering the scale and significance of those impacts; and consider any potential adjustments or mitigation to address those impacts.

The 'Belfast Conversation' brought together key stakeholders across the sectors for consultation event to gain a better understanding of residents', community groups' and partner organisations' aspirations for the city and how they would like to see it shape and develop over the next 15 years. As part of this, in December 2015, rural groups were identified and directly consulted to get a better insight into potential rural needs and issues.

### POP Consultation

Belfast has three rural settlements – Edenderry, Hannahstown and Loughview. With the absence of any formal guidance to implement the relevant sections of the Rural Needs Act NI (2016), we met directly with Hannahstown Community Association and Edenderry Residents Association to define their rural needs and discuss the POP in detail. A community group was not identified in Loughview, however, Lagan Integrated College located in the Loughview settlement, participated in the Youth POP. Direct engagement enabled identification and clarity on issues but also offered an opportunity to discuss the POP in detail to improve delivery and mitigate against any negative impacts.

The general flavour of responses correlated with the following options:

- **GR1 Supporting economic growth** – assurances were sought that the level of growth would not put pressure on the countryside.
- **LP1 Accommodating new homes** – as above in GR1. The groups expressed the importance of keeping Belfast's rural settlements unique and asked for consideration be given to the sensitive zoning of land in the later stages of the plan. Maintain the unique function and purpose of the village were asked to be a key consideration of policy development. A balance between development and preserving and maintaining the countryside is required.

<sup>1</sup> <http://www.legislation.gov.uk/nia/2016/19/enacted>

## Rural Proofing

- **LP8 Promotion of health and wellbeing** – there was general recognition that linkages to the environment are crucial for urban living including the green and blue network eg towpath and encouraging better and safer access to the Belfast Hills.
- **LP16 Local distinctiveness** – encouraging the sense of place through the retention of maintaining the uniqueness of Belfast’s rural villages.
- **VE7 Ensuring the vitality and viability of centres** - encouraging vitality in the city centres by opening the city centre up through interventions such as removal of shutters, night time economy etc.
- **VE11 City centre living** – lifetime housing will be key to sustaining city centre living.
- **SCR4 Walking, cycling and sustainable modes of transport** – new developments should have the appropriate level of footpaths and should link into the existing cycling network. Public transport in some rural villages are poorly serviced and is irregular and expensive.
- **SCR5 Public transport** - public transport in some rural villages are poorly serviced and is irregular and expensive.
- **SCR7 Parking demand management** – the lack of joined up government is a contributing factor to people wanting more parking in the city centre rather than thinking about better public transport into and around the city.
- **GA2 Provision of new open space and green corridors** – there was recognition that green networks are vital to the city and the groups were largely supportive of Section 76 Developer Contributions. Safe and continuous access that links the city to the hills will encourage positive health and economic benefits. Current access to the hills is poor and there is a need to explore greater and safer linkages between the city and countryside.
- **GA3 Natural heritage** – the Belfast Hills and Lagan Valley Regional Park are Belfast’s biggest assets. Appropriate protection should be afforded to protect the natural environment and to retain the integrity of the villages.

Our response to the above issues have been incorporated and addressed in the relevant options in Chapter 3 of this report.

## 12. Equality Impact Assessment (EQIA)

Section 75 of the Northern Ireland Act 1998 requires all public authorities in carrying out their functions relating to Northern Ireland to have due regard to the need to promote equality of opportunity between:

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

In addition, without prejudice to the above obligation, public authorities must, in carrying out their functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

The Disability Discrimination (NI) Order 2006 introduced new duties requiring all public authorities in carrying out their functions relating to Northern Ireland, to have due regard to the need to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life.

The Equality Impact Assessment (EQIA) will ensure these obligations are met to the fullest possible extent and that the promotion of equality of opportunity will be at the core of the LDP. The main purpose of the EQIA for the LDP is to ensure that, in identifying and taking forward future planning policy, we will give due regard to the need to promote equality of opportunity by addressing inequalities within and between Section 75 groups. It is therefore important to identify clearly the key inequalities which the future LDP has the potential to address.

The POP has been developed to support the aspirations and vision set out in the emerging Community Plan for the city (the Belfast Agenda). The POP provided us with the opportunity to consult with the public and stakeholders to encourage inclusive engagement aimed at stimulating discussion on key planning issues at this early stage of the LDP preparation.

### 12.1 Consultation questionnaire

The consultation questionnaire was structured around two sections which related to the content of the EQIA and Equality monitoring. This section of the report concentrates on feedback received on our approach to EQIA. The report focuses on the key findings and conclusions of the assessment, potential impacts and suggestions on how to address issues raised.

Three responses were received specifically on the EQIA. One from the Belfast Health and Social Care Trust, one from the Equality Commission and one from an individual. An overview of the responses is set out below and correlates with the structure of the questionnaire and includes responses to the key findings of the assessment, potential impacts on Section 75 groups and some suggestion about how they can be addressed through the plan.

#### You said

##### Key findings and conclusions of the Assessment

- There was general agreement with the EQIA's findings and conclusions.
- The structure of the EQIA was also endorsed but with the suggestion that the precept should be broadened to include promotion of equality and good relations at the core of the plan.
- Respondents endorsed the scale and variety of engagement to reach out to a broad spectrum of society and in particular hard to reach groups.

##### Potential impacts

- There was a broad view that the EQIA had identified most of the potential impacts, however there were a number of suggestions for inclusion
- Suggestion that cultural diversity should be considered more explicitly.
- There was a recommendation that the nine categories of section 75 groups could be extended most notably to include disability and BME workers (black and minority ethnic), Migrant workers, Roma, asylum seekers or

refugees. There was a concern that these groups disproportionately represented low employment levels.

- The plan should consider the impact of an ageing population.
- Emphasis on the importance of addressing housing need and in particular homelessness. Proposals on affordability were welcomed.
- Welcome housing mix and responding to changing demographics.
- There was support for an adequate programme of accommodation for Travellers, the needs of refugees and migrants and improved management of housing particularly HMOs.
- Welcome proposals for specialist accommodation for older people and lifetime homes.
- Support for improving health and wellbeing.
- Transport was seen to be a critical component of addressing inequality, particularly in relation to traffic congestion and air quality.



## Equality Impact Assessment (EQIA)

- Support for improved connectivity and the need for better accessibility for all of the population to amenities, facilities and services. Should be more focus on people with disabilities.
- Need for more and better green and open spaces with better access for all and greater connectivity.
- Awareness of increased reporting of hate crimes.
- Need to address physical and psychological aspects of division. Welcome need to address community cohesion through increased shared space, shared accommodation.
- Need for equality of opportunity across the city not just in the city centre.
- Implications of Brexit on the economy, inward investment and the City's attractiveness particularly to students. No regression from existing protections.

### Our Response

#### Key findings and conclusions of the assessment

We welcome the strong support given to the promotion of equality of opportunity and for the scale and variety of engagement that was undertaken during the consultation process. We welcome the suggestion that the promotion of good relations should be at the core of the plan.

#### Potential impacts and how they can be addressed

- **Section 75 Groups / Cultural diversity** - In its broadest sense the delivery of the LDP is likely to have a positive

#### How they can be addressed

- Many of the issues raised can be addressed through the promotion of equality of opportunity which should be at the core of the LDP.
- There is a need for collaborative working in terms of equality and good relations to address division and segregation
- Suggestion that the plan should aspire to nurture a sustainable and diverse workforce and promote economic and social well-being to help grow Belfast.
- A connected transportation strategy is required.
- Need to elaborate on connection between potential for open space to provide opportunities for communities from different community backgrounds to come together. The statement that, 'this is particularly important for those who do not have access to a car should be elaborated upon'.

impact on all Section 75 groups, both directly and indirectly by contributing to the economic, social and environmental regeneration and wellbeing of the city. Carefully managing the growth of the city has the potential to grow the city's attractiveness as a place to live in, work in, visit, study in or invest in.

- **Ageing population** - We agree that the LDP should in spatial terms contribute to addressing issues around life expectancy. The changing demographic profile of the city will present challenges for the provision of appropriate housing, to ensure that

housing needs are met at an appropriate scale and quality and that they are developed in sustainable locations.

- **Housing and homelessness** - A major focus of the LDP is on creating a liveable place which deals with the complex and multi-faceted nature of housing. By identifying the correct level of growth the plan will through a HNA identify not only the correct number of houses needed over the plan period but also the breakdown of types of housing that is required.
- **Health and wellbeing** – We acknowledge the clear linkages between active travel health and wellbeing. The multi-benefits of accessible quality open space are recognised. The LDP will seek to protect green and open space throughout the city and ensure that new development makes appropriate provision or contribution to new or improved facilities. The LDP will also incorporate proposals for an integrated 'green and blue infrastructure network' that includes connected green and open spaces.
- **Transport and Accessibility** - The Department is commencing work on a new Belfast Metropolitan Transport Plan which will set out the main transport proposals for the city. Closely aligned to this will be the Belfast City LDP which will include a major focus on accessibility and acknowledges the critical role that it will play in a successful and sustainable city.

There are opportunities to reconnect the city by improving public transportation networks and extend

service provision by promoting appropriate design in new developments to make the city more permeable and aid both vehicular and pedestrian movement. New development could be encouraged along routes connecting the city centre to inner-city neighbourhoods that are currently poorly integrated with the urban core.

We also note the support for accessibility for all to services facilities, particularly by sustainable transport modes. Specific matters relating to travel and transport were included in the smart, connected resilient place' theme of the POP and the responses indicate a strong endorsement of our proposed approach. The LDP will include policies that seek to ensure that new development is at appropriate locations and is accessible to all by a range of travel modes. In addition, through the 'green and blue infrastructure network', we will seek to improve accessibility and connectivity across the city.

- **Disconnection** - There are a number of ways that the LDP can attempt to reconnect the city by promoting accessibility and improving the physical environment. Many parts of the city are fractured, disjointed and poorly presented. Traffic congestion in the inner city contributes disproportionately to this disconnection and leads to negative environmental effects including poor air quality. The POP has suggested that planning policy and guidance including masterplans will be prepared to achieve greater urban cohesion tailored to specific locations.

## Equality Impact Assessment (EQIA)

- **Division** - There is an opportunity to increase equality of opportunity and contribute to a breakdown of the physical and psychological aspects of division by rejuvenating interface areas and facilitating the removal of barriers and other forms of infrastructure or architecture that serve to reinforce patterns of division within the city. There are opportunities to promote development of shared sites and facilities that provide safe access for all of the community and have potential to foster greater levels of social integration.
- **Economy** - A more competitive economy in Belfast will bring the potential for increased prosperity to all residents and the potential for more sustainable employment. We believe that the LDP will have the potential for positive impacts for Section 75 groups both directly and indirectly by contributing to the economic social and environmental regeneration and well-being of the city.  
We agree that the LDP should help to create equality of opportunity across the city by seeking to focus new

investment and development in appropriate locations. Whilst the city centre is an important focus for the entire city and is key to the success of Belfast as the regional economic driver, it is important that all neighbourhoods benefit from new investment and development. The LDP will include policies that help to sustain and improve neighbourhoods in all parts of the city.

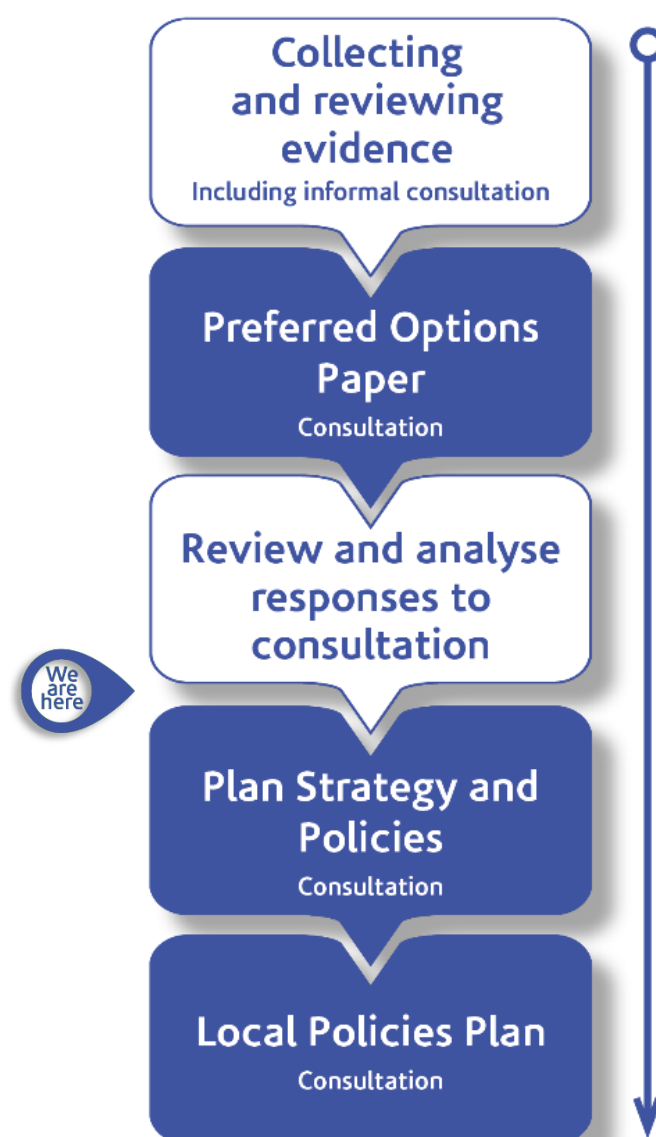
There are also opportunities to support and promote the continued regeneration of the city centre to attract inward investment and encourage a more diverse economy that will contribute to an enhancement in liveability and the city centre as a place. Such opportunities offer potential to attract residents to the city and facilitate initiatives to address dereliction and poor-quality environments within the city, and to promote the night-time economy.

- **Brexit** - The out workings and implications of Brexit do offer some significant uncertainties, but section 75 applies to Northern Ireland and is likely to continue irrespective of the UK's position within the EU.



## 13. What Happens Next?

- The POP was published on 26 January 2017 and was open for consultation until 5pm on Thursday 20 April 2017.
- The POP representations will inform the preparation of the draft Plan Strategy later in 2017.





# Glossary

<b>Active frontage</b>	Building frontage where there is an active visual engagement between those on the street and those on the ground floors of buildings.
<b>Active travel</b>	An approach to travel and transport by physically active, human powered modes, as opposed to motorised ones.
<b>Affordable Housing</b>	In its broadest sense the phrase affordable housing is housing that provides its occupants with an adequate standard of living without costing so much that a household is unable to meet other basic needs. Planning policy needs to develop an agreed approach to check whether proposed housing is in fact 'affordable'. This is usually based on the type of housing (such as social housing), a link between average house prices or rents and average incomes, or a combination of these two elements. A number of responses to our POP consultation related to how we should define affordable housing within the Plan Strategy – we intend to meet with all key stakeholders to discuss this matter further.
<b>Air Quality Management Areas (AQMA)</b>	Belfast City Council has a statutory duty to annually review, assess and report on air quality across the city under the Local Air Quality Management (LAQM) regime. This is provided for via Part 3 of the Environment (Northern Ireland) Order 2002 and the relevant Policy and Technical Guidance documents LAQM.PGNI(09) and LAQM.TG(16). Belfast City Council has designated four Air Quality Management Areas where the health based air quality objectives for nitrogen dioxide and particulate matter were exceeded.
<b>Areas of High Scenic Value (AOHSV)</b>	Areas of High Scenic Value (AOHSV) are designated to protect the setting of the Metropolitan Urban Area and other areas of particular landscape merit. There are portions of three AOHSV in the Belfast City Council area.
<b>Areas of Mineral Constraint</b>	Areas generally protected from minerals development, normally because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage).
<b>Areas of Outstanding Natural Beauty (AONB)</b>	A designation in recognition of areas of national importance as their landscapes possess a distinctive character and landscape features of high scenic value. The purpose of this designation is to protect and enhance the qualities of these areas for environmental fulfilment, outdoor recreation and public enjoyment. There is one AONB in the Belfast City Council Area.

## Glossary

### **Areas of Significant Archaeological Interest (ASAs)**

The SPPS notes the importance of LDP in taking into account the implications of local policies and proposals on all features of the archaeological and built heritage. It states that where appropriate, LDPs should designate Areas of Significant Archaeological Interest (ASAs). The Giants Ring is the only ASA in the Belfast City Council Area.

### **Areas of Townscape Character (ATC)**

The SPPS notes that in managing development within ATCs designated through the LDP process, the council should only permit new development where this will maintain or enhance the overall character of the area and respect its built form. There are 57 Areas of Townscape Character within the Belfast City Council Area.

### **Areas of Village Character**

Village areas designated in Development Plans where planning policies seek to protect their particular character, which is normally based on their historic built form or layout

### **Belfast Agenda**

The Belfast Agenda is the new Community Plan for Belfast and was created by a partnership of key city stakeholders, residents and community organisations. The plan sets out a joint vision and long-term ambitions for Belfast's future, as well as outlining the priorities for action over the next four years.

### **Belfast Bicycle Network Plan**

Scheme in Belfast which commenced in 2015 allowing members to hire bikes to rent from designated locations across the city. Bikes can be rented for a half an hour for free, after which time a fee will apply.

### **Belfast City Centre Regeneration and Investment Strategy (BCCRIS)**

The BCCRIS outlines a vision to develop a world-class city centre for the future. It was prepared by the Belfast City Council City Centre Development Team and sets out a collective ambition for the continued growth and regeneration of the city core and its surrounding areas to 2030.

### **Belfast Conversation**

This was the name given to the extensive period of public and stakeholder consultation which took place in advance of preparing the new Community Plan for Belfast – the Belfast Agenda. The 'Belfast Conversation' brought together key stakeholders across the various sectors for consultation to get a better understanding of residents', community groups' and partner organisations' aspirations for the city and how they would like to see it shape and develop over the next 15 years.

### **Belfast Metropolitan Area Plan (BMAP)**

The Belfast Metropolitan Area Plan 2015 is a development plan prepared under the provisions of Part 3 of the Planning (Northern Ireland) Order 1991 by the Department of the Environment (DOE). The Plan covers the City Council areas of Belfast and Lisburn and the Borough Council areas of Carrickfergus, Castlereagh, Newtownabbey and North Down.



<b>Belfast Metropolitan Transport Plan</b>	A local transport plan, published in 2004 by former Department for Regional Development now Department for Infrastructure, for the Belfast Metropolitan Area. It sets out proposals and priorities to improve walking, cycling, public transport and the highway network to 2015.
<b>Belfast Public Bike Share Scheme</b>	Consultation document published in 2017 which aims to guide the development and operation of the bicycle infrastructure in Belfast for the next 10 years. It proposes to develop different types of routes depending on user needs and network requirements. It identifies a Primary Network consisting of 8 arterial/radial routes and 3 orbital routes and a secondary network proposed to reach further into communities providing access to services and other key destinations.
<b>Brownfield</b>	Land that has previously been developed. May include vacant or derelict land, infill land, land occupied by redundant or unused buildings and developed land.
<b>Built Heritage</b>	The Belfast Council Area contains a significant number of archaeological sites and monuments, listed buildings, conservation areas, historic parks, gardens and demesnes and has an important industrial heritage.
<b>Building Research Establishment Environmental Assessment Method (BREEAM)</b>	BREEAM, first published by the Building Research Establishment in 1990, is the world's longest established method of assessing, rating, and certifying the sustainability of buildings.
<b>Buildings at Risk Register</b>	Buildings and monuments of architectural and historic interest. Deemed to be under threat and may be suitable for restoration and repair. There are currently 49 buildings and monuments listed in the Belfast City Council area.
<b>Community Cohesion</b>	Community cohesion refers to the sense of togetherness and bonding exhibited by a community, which helps to hold that community together. It may include feelings of belonging together, shared purpose or identity, or sense of place.
<b>Community Infrastructure</b>	The community, health, leisure, nurseries and educational facilities and services that serve and help to sustain a community.
<b>Conservation Areas</b>	The SPPS notes that in managing development within a designated Conservation Area the guiding principle is to afford special regard to the desirability of enhancing its character or appearance where an opportunity to do so exists, or to preserve its character or appearance where an opportunity to enhance does not arise. There are 13 conservation areas within the Belfast City Council area.

## Glossary

- Countryside Assessment** Provides an overview of the existing environmental assets in the Belfast City Council Area and how these are protected. This will include the following four interrelated strands:
- An Environmental Assets Appraisal;
  - A landscape Assessment;
  - A Development Pressure Analysis; and
  - A Settlement Appraisal.
- Department for Infrastructure (Dfi)** The Department for Infrastructure (Dfi) is one of nine Northern Ireland Departments. The main responsibilities of the Department are:
- Regional strategic planning and development policy;
  - Transport strategy and sustainable transport policy;
  - Public transport policy and performance;
  - Road safety and vehicle regulation policy, including strategies to reduce the number of people killed or seriously injured on our roads;
  - Driver and operator licensing and driver and vehicle testing
  - Provision and maintenance of all public roads;
  - Certain policy and support work for air and sea ports;
  - River and sea defence maintenance and the construction of flood alleviation schemes;
  - Provision of flood maps and risk information;
  - Policy on water and sewerage services and management of the Department's shareholder interest in Northern Ireland Water.
- Development contribution (Section 76)** A contribution, either financial or in kind, which allows the provision of infrastructure that is necessary for a development to go ahead.
- Draft Car Parking Strategy** Strategy commissioned by Belfast City Council which seeks to address car parking issues in the city centre including location, quantity, quality and pricing of parking provision as well as commuter parking and its impact on residential communities. The strategy includes a draft action plan to address the challenges and balance parking provision with other transport modes. It also seeks to balance the access requirements of residents, businesses, commuters and visitors.
- Fabric first' approach** A 'fabric first' approach to building design involves maximising the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems.

<b>Green and Blue Infrastructure</b>	Green and Blue Infrastructure is a phrase used to describe all green and blue spaces in and around our towns and cities. The term enables the consideration of the collective value of all of these spaces together. Constituent elements of green and blue infrastructure include parks, private gardens, agricultural fields, hedges, trees, woodland, green roofs, green walls, rivers and ponds. The term covers all land containing these features, regardless of its ownership, condition or size. It is all green and blue spaces in and around our towns and cities.
<b>Green Corridor</b>	A strip of land that provides sufficient habitat to support wildlife, often within an urban environment, thus allowing the movement of wildlife along it. Can act as vital linkages for wildlife dispersal between wetlands and the countryside. Common green corridors include railway embankments, river banks and roadside grass verges. Green corridors can also be continuous paths and cycle routes, which can link housing areas to the city centres, places of employment and community facilities. They help to promote environmentally sustainable forms of transport such as walking and cycling within urban areas.
<b>Greenfield</b>	Land on existing undeveloped or green space.
<b>Habitats Directive</b>	The Habitats Directive aims to maintain biodiversity of a range of "rare, threatened or endemic animal and plant species" whilst taking cognisance of the economic, social, cultural and regional requirements.
<b>Habitats Regulations Assessment (HRA)</b>	Section 102 of the Conservation of Habitats and Species Regulations (2010) requires a Habitats Regulations Appraisal (HRA) to be undertaken during the preparation of a LDP, if necessary.
<b>Higher Educational Institutions</b>	Higher Educational Institutions refers to the collective of third level educational facilities including universities and technical colleges.
<b>House in Multiple Occupation (HMO)</b>	HMO stands for House in Multiple Occupation and generally refers to one of the following: <ul style="list-style-type: none"> <li>• A house split into bedsits;</li> <li>• A house or flat-share where each tenant has their own tenancy agreement; and</li> <li>• Students living in shared accommodation.</li> </ul>
<b>Housing Association</b>	A housing association is a society, body of trustees or company that provides rented accommodation and specializes in accommodation for special needs groups. Housing Associations are the main developers of new social housing for rent in Northern Ireland.

## Glossary

### **Housing Growth Indicators (HGIs)**

The RDS introduces the concept of having housing growth indicators applied to the Region. Their purpose is to direct the distribution of housing in the Region over the period to 2035, through the development plan process, in accordance with the Spatial Development Strategy.

### **Housing Growth Options Report**

A report commissioned by Belfast City Council as part of the evidence base in the preparation of the new local development plan, setting out in detail the different options for new housing growth in the city.

### **Housing Market Analysis**

The method used by the Northern Ireland Housing Executive to estimate the need for social housing across Northern Ireland.

### **Housing Market Area (HMA)**

A housing market area is defined as a geographical area where most people both live and work and where most people moving home (without changing job) seek a house. HMA's can overlap, and often do not marry well with local authority boundaries. Moreover, they are dynamic and HMA boundaries can change over time.

### **Housing Monitor**

The purpose of a Housing Monitor is primarily to inform local development plan preparation by assessing the extent of housing land available within an area and the estimated number of units that this could accommodate. It will also help the Council identify where a potential shortfall in land supply might exist and serve to inform house builders on the availability of land that may be suitable for housing.

### **Housing Needs Assessment**

An important planning tool which enables an understanding of current housing market trends and identifies potential future imbalances in the Housing Market. It also provides a more detailed and rigorous inter tenure analysis of the housing market to complement the Housing Needs Assessment.

### **Infrastructure**

The basic physical and organizational structures and facilities (e.g. buildings, roads, power supplies, water services) needed for the operation of a society or enterprise.

### **Integrated Tourism Strategy**

The Belfast Integrated Tourism Strategy sets out our aims, objectives and major projects to drive the expansion of tourism into Belfast. In particular, it shows how we can:

- Develop and manage the city's reputation as a destination,
- Build the capacity of the city with regard to facilities and services for tourists, and
- Prioritise the development of new products and attractions for visitors.

<b>Interim Report-Sustainability Appraisal</b>	<p>The Interim Report is part 2 of the first stage (Stage A) of the SA process. Stage A (2) requires the preparation of the environmental report which involves:</p> <ul style="list-style-type: none"> <li>• Identifying, describing and evaluating the likely significant effects on the environment of implementing the plan;</li> <li>• Reasonable alternatives taking into account the geographical scope of the plan and reasons for selecting the alternatives dealt with; and</li> <li>• Description of how the assessment was undertaken including any difficulties encountered in compiling the required information.</li> </ul>
<b>Joint Minerals Plan</b>	<p>A plan covering 2 or more district councils that provides a jointly-agreed framework for minerals development, which might also define areas of minerals constraint and safeguarding areas for minerals resources and associated facilities.</p>
<b>Key Site Requirement</b>	<p>A set of criteria applying to a specific allocated area of land, against which all site development proposals will be assessed.</p>
<b>Life expectancy</b>	<p>The average period that a person may expect to live.</p>
<b>Lifetime Homes</b>	<p>A set of 16 design criteria that provide a model for building accessible and adaptable homes to meet the needs of the occupier over their lifetime.</p>
<b>Listed Building</b>	<p>The SPPS recognises that Listed Buildings of Special Architectural or Historic Interest are key elements of our built heritage and are often important for their intrinsic value and for their contribution to the character and quality of settlements and the countryside. There are approximately 1379 listed buildings within the Belfast City Council area.</p>
<b>Living Over the Shop Schemes</b>	<p>The LOTS scheme was introduced to encourage people to live in properties over shops in certain areas of town centre regeneration.</p>
<b>Living with Water Programme</b>	<p>The Living with Water Programme is an interdepartmental programme set up to develop a Strategic Drainage Infrastructure Plan to support economic growth, protect the environment and address flood risk in Belfast.</p>
<b>Local Landscape Policy Areas</b>	<p>Areas designated in Development Plans areas warranting additional protection from undesirable or damaging development because of their particular amenity value, landscape quality or local historical or natural significance.</p>

## Glossary

<b>Local Policies Plan</b>	The Local Policies Plan is prepared following adoption of the Plan Strategy. It outlines the detailed land use proposals, including zonings and key site requirements, for the local development plan. Together with the Plan Strategy, it will be the principle consideration when determining future planning applications for development in the city.
<b>Masterplan</b>	A masterplan is a plan that outlines an overall development concept for an area, including urban design, landscaping, infrastructure, service provision, circulation, present and future land use and built form. It provides a structured approach and creates a clear framework for the future development of an area.
<b>North Eastern River Basin Management Plan</b>	River Basin Management is a key element in implementing the Water Framework Directive (WFD), taking an integrated approach to the protection, improvement and sustainable use of the water environment. It applies to groundwater and to all surface water bodies, including rivers, lakes, transitional (estuarine) and coastal waters out to one nautical mile. The North Eastern River Basin Management Plan covers an area of around 4000 km <sup>2</sup> , including 1000km <sup>2</sup> of marine waters. It takes in large parts of Counties Antrim and Down and a smaller portion of Derry.
<b>Northern Ireland Housing Executive (NIHE)</b>	NIHE, the Northern Ireland Housing Executive, was established in 1971 as Northern Ireland's strategic housing authority. It offers a range of services to people living in socially rented, privately rented and owner occupied accommodation as well as supporting and working with a number of other public bodies, and with registered Housing Associations to facilitate the delivery of social housing in areas of identified need.
<b>Northern Ireland Executives' Strategic Energy Framework</b>	Government framework document published in 2010 setting out key energy goals around ensuring future access to secure, competitively priced and sustainable energy supplies for all in Northern Ireland.
<b>Northern Ireland Statistics and Research Agency (NISRA)</b>	NISRA is the principle source of official statistics and social research on Northern Ireland. It aims to provide a quality, cost effective registration, statistics and research service.
<b>One city</b>	Integrating the fragmented city together as one coherent entity to be planned and developed as a whole,
<b>Open Mosaic Habitats in Previously Development Land</b>	Open Mosaic Habitats in Previously Development Land is a priority habitat and are found mainly in urban formally industrial areas and have high biodiversity value.

<b>Placemaking</b>	Placemaking is a multi-faceted approach to the planning, design and management of public spaces. Placemaking capitalizes on a local community's assets, inspiration, and potential, with the intention of creating public spaces that promote people's health, happiness, and wellbeing.
<b>Plan Strategy</b>	The Plan Strategy outlines the strategic aims and objectives of the Local Development Plan. It is prepared following consultation on the Preferred Options Paper. Together with the local policies plan, it will be the principle consideration when determining future planning applications for development in the city.
<b>Planning Policy Statement</b>	Planning Policy Statement set out policies on particular aspects of land-use planning and apply to the whole of Northern Ireland.
<b>Preferred Options Paper (POP)</b>	This Paper represents the start of work on a Local Development Plan and is a consultation document outlining what are considered to be the key plan issues and the preferred options available to address them. It seeks to promote debate on issues of strategic significance that are likely to influence the shape of future development within the city.
<b>Previously Developed Land</b>	Previously developed land (also commonly referred to as brownfield land) is that which is, or was occupied by, a permanent structure within a defined settlement limit. The term may encompass vacant or derelict lands; infill sites; land occupied by redundant or under-used buildings; a piece of industrial or commercial property that is abandoned or under-used and often environmentally contaminated.
<b>Private Rental Sector (PRS)</b>	The purpose of PRS is to accelerate the growth of investment in the private rented sector, providing a supply of new, purpose built and professionally managed private rented sector homes, helping improve standards and increase choice for tenants.
<b>Purpose Built Managed Student Accommodation (PBMSA)</b>	PBMSA is accommodation that is built, or converted, with the specific intent of being occupied by students undertaking a full time course of higher or further education – either individual en suite units or sharing facilities. The inclusion of the word 'managed' highlights the importance of such accommodation being centrally supervised by the developer or landlord to provide welfare support for students and to ensure compliance with any code of conduct or tenancy agreements, etc.

## Glossary

### **Quiet Areas**

The designation of Quiet Areas is a further legal requirement of END and the Environmental Noise Regulations (Northern Ireland) 2006. END requires Member States to 'preserve environmental noise quality where it is good' by identifying Quiet Areas within agglomerations (urban areas with a minimum population density). On 7th June 2016, Lagan Meadows was proposed as a Candidate Quiet Area and is currently under consideration by DAERA.

### **Regional Development Strategy (2035)**

The Regional Development Strategy sets the context for the sustainable development of Northern Ireland to 2035. The RDS acts as the spatial strategy of the Northern Ireland Executive's Programme for Government. The RDS was revised in 2010 to reflect the changing development of Northern Ireland and continues to set the overarching planning framework for the region.

### **Renewable Energy**

Any naturally occurring source of energy such as solar, wind, tidal wave, biomass and hydroelectric power that is not derived from fossil or nuclear fuel.

### **Retail Capacity Study**

An analysis of the quantity and quality of existing retail provision within the city and an assessment of the quantum and location of new retail provision to meet future needs.

### **Rural Needs Act NI (2016)**

The Rural Needs Act NI (2016) places a duty on public authorities to have due regard to rural needs when developing, implementing or devising policies, plans or programmes.

### **Rural Proofing**

Rural proofing is the process where any major policy and strategy are assessed to determine whether they have a differential impact on rural areas, and where appropriate, make adjustments within their plans to take account of particular rural circumstances.

### **Scheduled Historic Monuments and Archaeological Objects (NI) Order 1995**

Scheduled Historic Monuments and Archaeological Objects (NI) Order 1995 is one of the primary pieces of legislation used to protect archaeological sites and built heritage.

### **Scheduled Zone (Scheduled Monuments)**

Archaeological sites and monuments are scheduled for protection under the Historic Monuments and Archaeological Objects (NI) Order 1995 and the work of scheduling is ongoing. There are 37 scheduled archaeological monuments in the Belfast City Council area.



<b>Sequential Approach</b>	The sequential test sets out the requirements for developments for main town centre uses. It states that these should be located within the town centre, or if this isn't possible, edge-of-centre locations. Only in cases where there is a distinct lack of suitable sites outside of the town centre be considered. The test is intended to ensure that retail developments (and other types of development that are appropriate to be situated within town centres) will not end up in a location that would draw away trade from the town centre.
<b>Shatter Zones</b>	Areas of land within towns and cities which have been physically separated by road, rail or other physical barriers, and have consequently become disconnected from surrounding areas. They often lie derelict, are exposed to littering and vandalism, and can attract unwanted anti-social behaviour.
<b>Sites of Local Nature Conservation Importance (SLNCIs)</b>	SLNCIs are established under the Wildlife (NI) Order 1995 and Local Nature Reserves that may be established by local Councils under the Nature Conservation and Amenity Lands (NI) Order 1985. SLNCIs are managed by public agencies or voluntary bodies and are identified by their local nature importance on the basis of their flora, fauna or scientific interest. In the Belfast City Council area, there are 60 SLNCIs
<b>Sites of Local Nature Conservation Interest</b>	Areas designated in Development Plans of local nature conservation importance on the basis of their flora, fauna or earth science interests.
<b>Social Housing</b>	Housing provided by registered Social Landlords for rent. Such housing is allocated by reference to an approved (Department for Social Development) Common Waiting List and allocation system.
<b>Spatial Connectivity</b>	A measure of how well places, areas or spaces are connected or linked to each other.
<b>Strategic Environmental Assessment (SEA)</b>	The SEA is set out in European Directive 2001/42/EC and is transposed into Northern Ireland law by the 'Environmental Assessment of Plans and Programmes Regulations (NI) 2004 (EAPP (NI) 2004), referred to as 'SEA Regulations'. The SEA is a procedure that contributes to the integration of environmental considerations in the preparation and adoption of plans and programmes.

## Glossary

### **Strategic Planning Policy Statement (SPPS)**

The Department of the Environment's (now Department of Infrastructure) Strategic Planning Policy Statement (SPPS) published in 2015, sets out strategic subject planning policy for a wide range of planning matters. It also provides the core planning principles to underpin delivery of the two-tier planning system with the aim of furthering sustainable development. It sets the strategic direction for the new councils to bring forward detailed operational policies within future local development plans.

### **Supplementary Planning Guidance (SPG)**

Supplementary Planning Guidance (SPG) supports, clarifies or illustrated by example planning policy statements and plans. This can take the form of design guidance, such as the recent one council developed on Purpose Built and Managed Student Accommodation or guides prepared for Conservation Areas. It also includes a set of Development Control Advice Notes that explain the criteria and technical standards to be considered when dealing with specific categories or particular aspects of development. Where relevant to a particular development proposal supplementary guidance will be taken into account as a material consideration in making decisions.

### **Supported Housing**

Supported Housing enables vulnerable people to live more independently, both in their own home and in the community, through the provision of housing related support services.

### **Sustainability Appraisal - Scoping Report**

The Scoping Report is the first stage (Stage A) of the SA process and it involves:

- Reviewing relevant plans, policies and programmes, and objectives relevant to the plan with information on synergies or inconsistencies;
- Collecting baseline information;
- Identifying the economic, social and environmental issues and objectives the Council proposes to address in helping to deliver sustainable development through the LDP;
- Developing the proposed framework by which the strategic options and detailed policies and proposals of the LDP will be appraised; and
- Consulting on the scope of the SA (incorporating SEA) in accordance with the SEA Directive, which has been transposed into Northern Ireland law by the 'Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 EAPP (NI) Reg 11.

### **Sustainability Appraisal of Reasonable Alternative Options**

Presents the summaries of the likely significant effects (positive and negative) of the Reasonable Alternatives considered to determine the preferred option for the preparation of the Preferred Options Paper (POP).

## Sustainable Development

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- An economic role. Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- A social role. Supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural wellbeing; and
- An environmental role. Contributing to protecting and enhancing our natural, built and historic environment and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

## Sustainable Drainage Systems (SUDS)

SUDS are a sequence of water management practices that seek to alleviate the problems associated with hard and paved surfaces in urban environments, by storing or re-using surface water at source, thereby decreasing flow rates to watercourses and improving water quality.

## Sustainable Urbanism

The application of sustainability and resilient principles to the design, planning, and administration/operation of cities.

## Travellers

A generic group as defined by the Race Relations (NI) Order 1997 i.e. "having a shared history, culture and traditions, including a nomadic way of life."

## Glossary

<b>Urban Capacity Study</b>	An Urban Capacity Study assesses the supply of land and buildings that may be available to accommodate new housing development. They are a valuable tool in facilitating sustainable development by identifying land and buildings within an area that might be reused for housing purposes and to form the basis for choosing new housing sites and the management of their release through the LDP.
<b>Urban Connection Projects</b>	The Urban Connection Project is an organisation that is centered around raising the odds of success amongst urban students.
<b>Urban Footprint</b>	This is defined as the continuous built-up area of a settlement. Urban footprints have been identified and set as the baseline of January 2001 and for monitoring purposes will not be altered for five years. The boundary is represented by an uninterrupted line, often lying inside the planned settlement limit. It contains land that has a formal urban use and, for example, gardens on the edge of the settlement will be included within the urban area as they form part of a curtilage of a building. Undeveloped zoned land at the edge of the settlement is excluded.
<b>Urban Landscape Wedges</b>	Urban Landscape Wedges are open areas that are designated to separate localities within the Metropolitan Urban Area. They have a significant role in helping to define and retain the identities and character of the component parts of the urban area and preventing the merging of different city communities. There are 5 designated sites within the Belfast City Council area.
<b>Viability</b>	A measure of a centres capacity to attract ongoing investment for maintenance, importance and adaptation to changing needs.
<b>Vitality</b>	A measure of how busy a centre is.
<b>Waste Water Treatment Works</b>	Waste Water Treatment works is the location where sewage is treated and cleaned. The sewerage system is the network of sewers, pipes and pumps that lie unseen beneath virtually every road and street that carry sewage from where it is produced to the waste water treatment works.
<b>Water Framework Directive</b>	The Water Framework Directive aims to achieve 'good ecological status' or better, for the quality of all water bodies.
<b>Wellbeing</b>	A good or satisfactory condition of existence; a state influenced by health, happiness and prosperity. For a larger group of people, it could be described as the welfare of that group.
<b>Windfall Housing</b>	Housing sites that were not allocated as such nor anticipated during the preparation of the development plan, but which become available during the lifetime of the Plan.



## Appendix A: Respondents

The following organisations provided a response to the POP consultation:

- Alanis Capital Ltd
- Alfred Street Properties Ltd
- Antrim and Newtownabbey Council
- ArdMackel
- Autism NI
- Ballyvessey Holding Ltd
- Belfast Chamber of Trade & Commerce
- Belfast Civic Trust
- Belfast Gas Transmission
- Belfast Harbour
- Belfast Health and Social Care Trust
- Belfast Healthy Cities
- Belfast Hills Partnership
- Belfast Holyland Regeneration Association
- Belfast Metropolitan Residents' Group
- Belfast Travellers
- Big Lottery Fund
- Blackstaff Community Development Association
- Braniff Associates (Belfast Royal Academy)
- BT
- Car Park Services Ltd
- Chancery House Investments
- Chartered Institution of Highways and Transportation (CIHT)
- Choice
- City Repairo
- Clyde Shanks for Neptune Group
- CoHousing NI
- Colin Neighbourhood Partnership Board
- Community Arts Partnership
- Consumer Council
- Conway Group
- D R Mitchell Ltd
- Department for Infrastructure
- Department for the Economy
- Development Trusts NI
- Disability Action
- EIRGRID obo SONI
- Equality Commission
- Falls Community Council
- Fraser Homes Ltd
- George Best City Airport
- Greater Shankill Partnership
- Healthy Ageing Strategic Partnership
- Henderson Group Property
- Hermes Real Estate Management Belfast
- Heron Bros
- Hillview Centre Belfast Ltd
- Historic Environment Division - Department for Communities
- Historic Monuments Council - Department for Communities
- Inner North Neighbourhood Renewal Partnership
- Inner South Belfast Neighbourhood Partnership
- Institution of Civil Engineers
- Invest NI
- Kennedy Shopping Centre
- Kilmona Holdings Ltd
- Lacuna Developments Ltd
- Lagan Homes
- Lagan Navigation Trust
- Lagan Valley Regional Park
- Lambert Smith Hampton
- Ligoniel Improvement Association
- Lisburn and Castlereagh City Council
- Lower Ormeau Residents Action Group (LORAG)
- Lower Shankill Community Association

## Appendix A: Respondents

- Lower Woodstock Community Association
  - Mae Murray Foundation
  - Markets Development Association
  - McAleer & Rushe
  - McCaw Architects
  - Michael Burroughs Associates
  - Ministerial Advisory Group
  - Mount Eagles Drive Action Group
  - Mr David Magill
  - NI Environment Agency (NIEA)
  - NI Environment Link (NIEL)
  - NI Federation of Housing Associations (NIFHA)
  - NI Housing Executive (NIHE)
  - NI Independent Retail Trade Association (NIIRTA)
  - NI Renewable Industry Group (NIRG)
  - PLACE
  - Planning for Spatial Reconciliation at QUB
  - Police Service of Northern Ireland
  - PPR
  - Pragma Planning
  - Probation Board for Northern Ireland
  - Queen's University Belfast (QUB)
  - Queen's Film Theatre (QFT)
  - R. Stanley Laird & Son
  - Recomposing the City Research Group, QUB
  - Rivers Agency
  - RNIB
  - RSPB
  - Savills obo PG Ltd
  - Seedhead Arts
  - South Belfast Partnership Board
  - Stranmillis Residents Association
  - Sustrans
  - Swinford (Sirocco) Ltd
  - The Baird Group
  - The O'Neill Family
  - Titanic Foundation Ltd
  - Titanic Quarter Ltd and Belfast Harbour (Belfast Agenda incl)
  - Township NI
  - Translink
  - TSA Planning
  - Ulster Architectural Heritage Society (UAHS)
  - Ulster University
  - URPA
  - Woodland Trust
  - WRDA
- There were also 40 Individuals who responded and 2 elected members.

A total of 58 responses were received, 47 via Citizen Space and 11 hand written using hard copies of the questionnaire. Of the 11 schools contacted, 53 responses were received from the following schools:

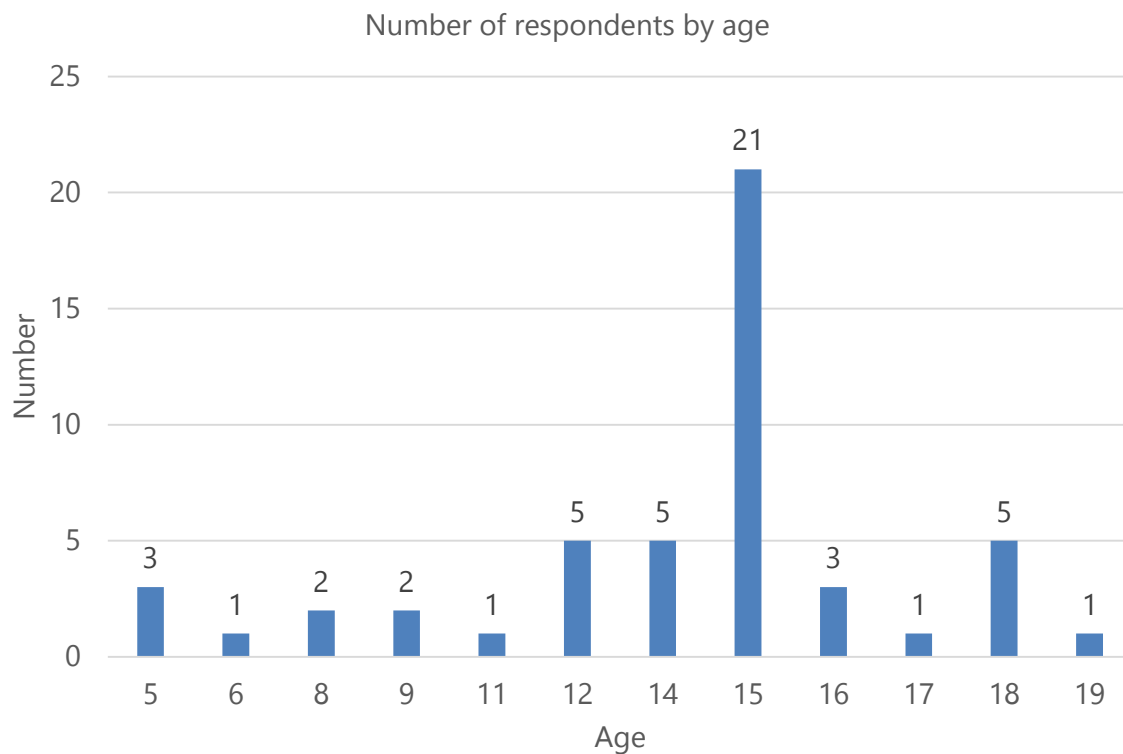
- Ashfield School (1)
- Belfast Royal Academy (6)
- Dominican College Fortwilliam (6)
- Grosvenor Grammar School (17)
- Hunterhouse College (1)
- Lagan College (7)
- Our Lady's & St. Patricks College (1)
- Park Grammar (2)
- St Dominic's Grammar School (12)

Additionally, there were a further 5 responses gathered from the following After Schools groups:

- Lagan Village Group After Schools (2)
- Lower Oldpark After School (2)
- North Queen St. Play Centre (1)

## Appendix A: Respondents

The age of respondents ranged from 5 – 19 year olds as shown in the following graph:



The following organisations also responded to the **Sustainability Appraisal**:

- NI Environment Agency A number of responses to the POP also referred to sustainability issues.
- NI Environment Agency: Historic Environment Division

The following organisations also responded to the **Equality Impact Assessment**:

- Belfast Health & Social Care Trust There was also 1 Individual who responded to the EQIA.
- Equality Commission NI A number of responses to the POP also referred to sustainability issues.



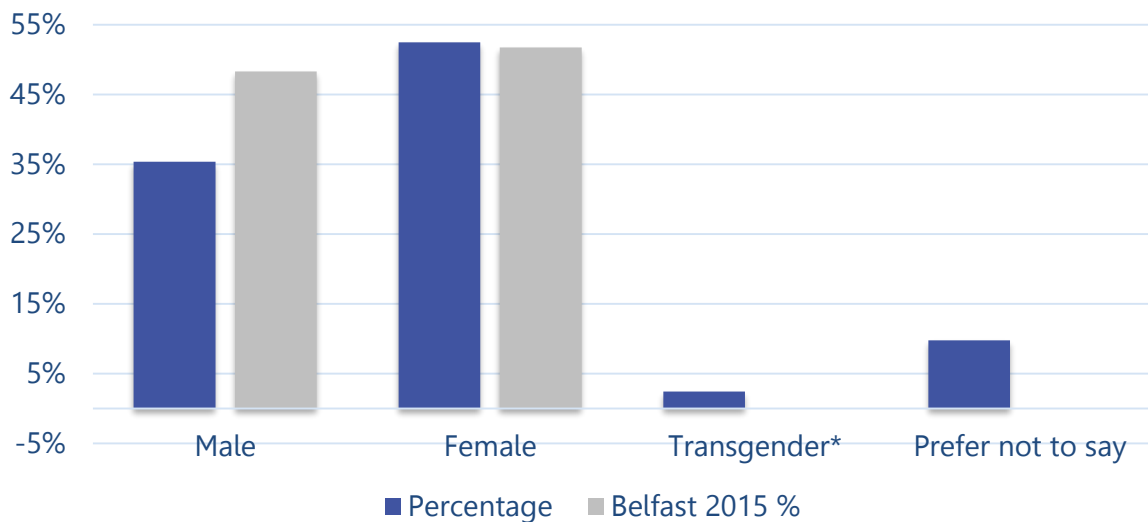


## Appendix B: Equality monitoring

Of respondents who completed the equality monitoring section of the POP consultation response:

### Gender

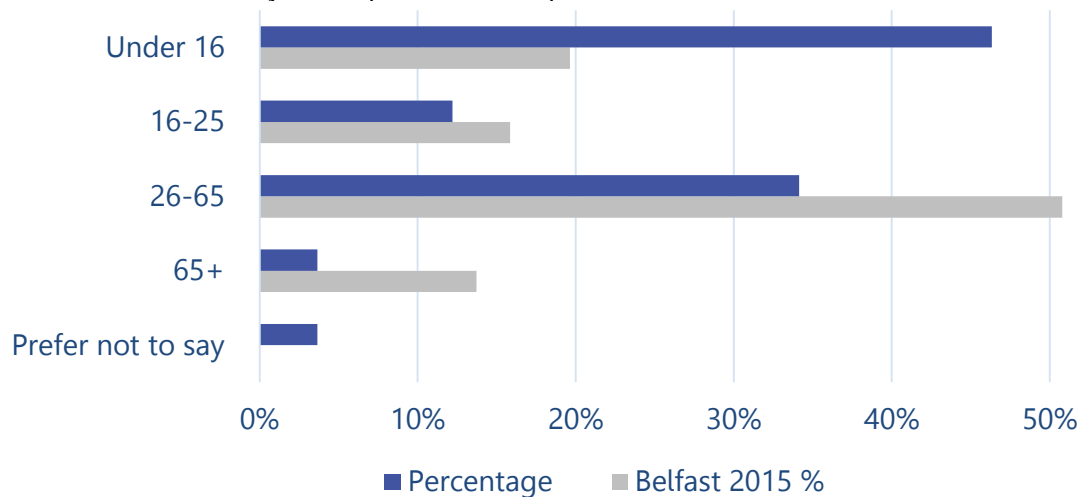
This was answered by 82 respondents (38 per cent)



\* Belfast 2015 Mid-year population estimates do not include Transgender category

### Age

This was answered by 82 respondents (38 per cent)



### Marital status

This was answered by 35 respondents (16 per cent)

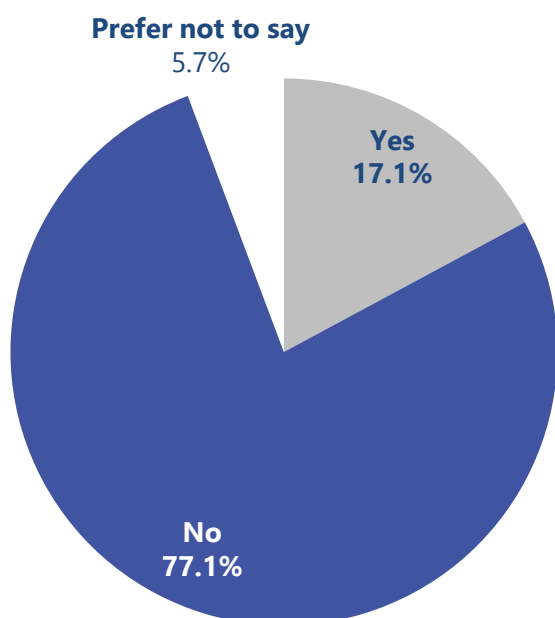
	Count	Percentage
Single (never married or in a same sex civil partnership),	6	17.1%
Married, or registered in a same sex civil partnership	17	48.6%
Living together as if you are married or in a same sex civil partnership	4	11.4%
Separated, divorced, or formerly in a same sex civil partnership that is now dissolved	2	5.7%
Widowed, or surviving partner from a same sex civil partnership	1	2.9%
Other please specify (comment box)	0	0.0%
Prefer not to say	5	14.3%
<b>Total</b>	<b>35</b>	

### Disability

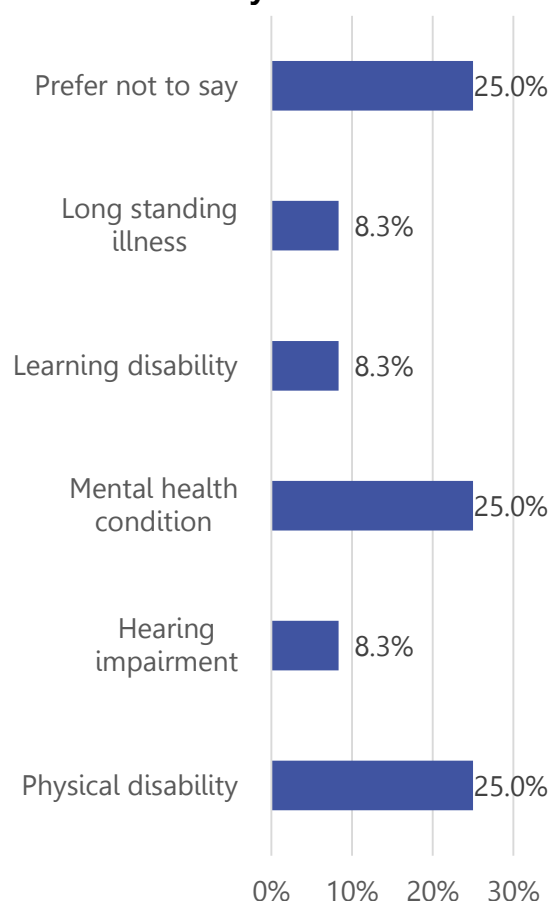
This was answered by 35 respondents (16 per cent).

Under the Disability Discrimination (NI) Act 1995 a disabled person is defined as a person with: "A physical or mental impairment, which has a substantial or long term adverse effect on their ability to carry out a normal day's activities."

#### Having read this definition, do you consider yourself to have a disability?



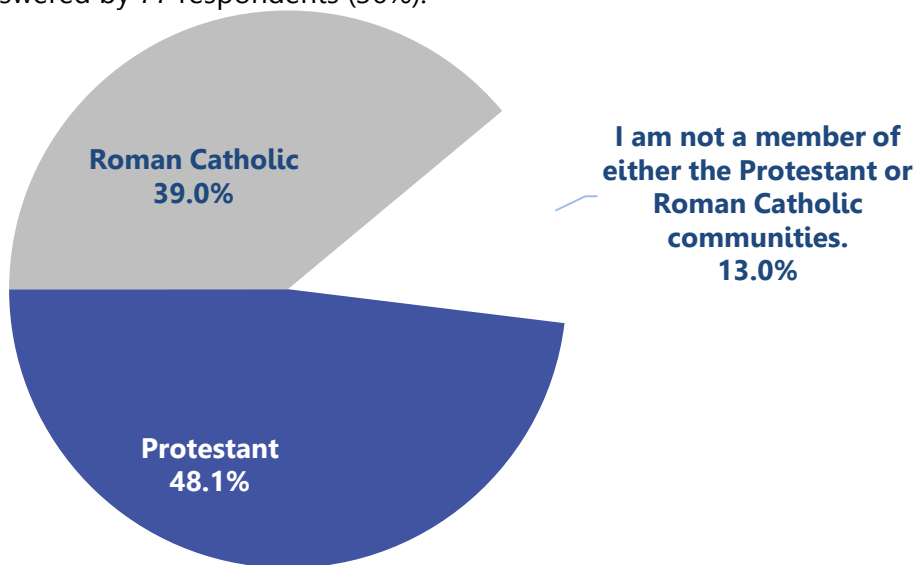
#### If yes, how does this disability affect you?



## Appendix B: Equality Monitoring

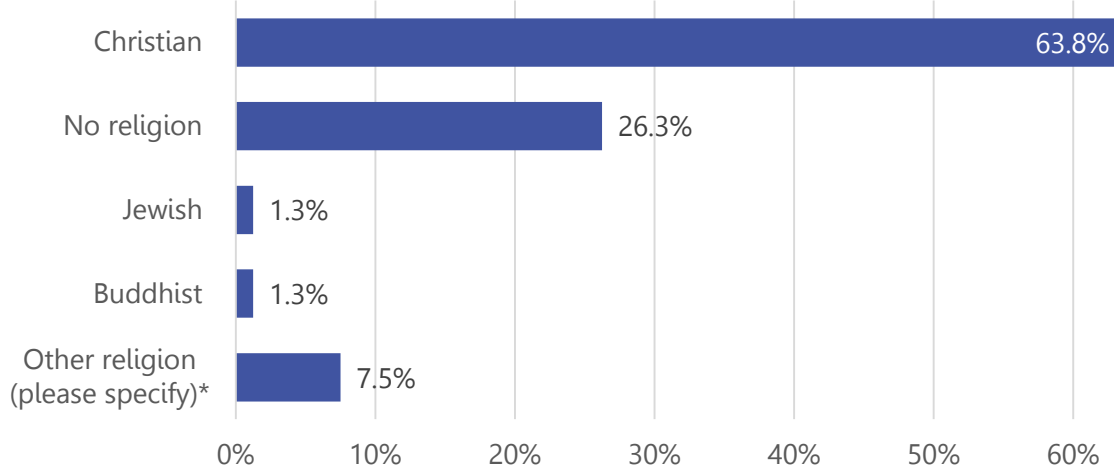
### Community background

This was answered by 77 respondents (36%).



### Religious denomination

This was answered by 80 respondents (37%).



\* Other included: Agnostic, Hindu and Sikh, Buddhist and Hindu

### Ethnicity

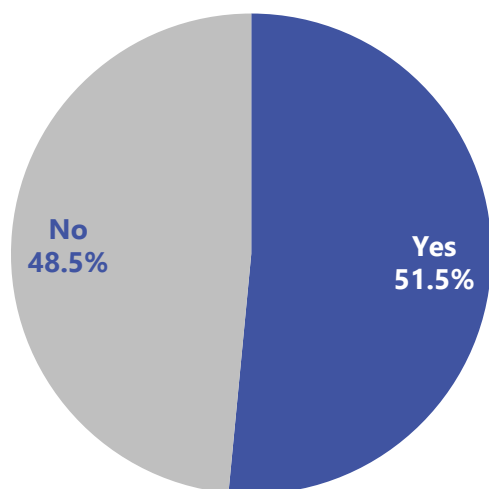
This was answered by 81 respondents (38%).

	Count	Percentage
White	74	91.4%
Indian	1	1.2%
Black African	1	1.2%
Mixed ethnic group (please specify)	1	1.2%
Other (please specify)	4	4.9%
<b>Total</b>	<b>81</b>	

### Dependents

This was answered by 33 respondents (15 per cent).

**Do you have dependants or caring responsibilities for family members or other persons?**



**If yes, which of the following caring responsibilities do you have?**

	Count	Percentage
A child or children	17	89.5%
A person with a disability	2	10.5%
An elderly person	0	0.0%
Other (please specify)	0	0.0%
<b>Total</b>	<b>19</b>	

### Sexual orientation

This was answered by 35 respondents (16 per cent).

**Is your sexual orientation towards someone of...?**

	Count	Percentage
The same sex	3	8.6%
Different sex	27	77.1%
Both sexes	0	0.0%
Questioning / not sure	1	2.9%
Prefer not to say	4	11.4%
Other (please specify)	0	0.0%
<b>Total</b>	<b>35</b>	

**Belfast Planning Service  
Belfast City Council  
Cecil Ward Building  
4-10 Linenhall Street  
Belfast  
BT2 8BP  
T: 028 90 320 202, ext 2255  
E: [planning@belfastcity.gov.uk](mailto:planning@belfastcity.gov.uk)**



**Belfast  
City Council**