



# Belfast Local Development Plan

Draft Plan Strategy – Public consultation report  
August 2019



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## List of Abbreviations

# Introduction



## Introduction

### 1.1 Background

- 1.1.1 The Belfast Agenda is an ambitious community plan that promotes inclusive balanced economic growth to reduce social inequalities to deliver a thriving city and connected sustainable neighbourhoods. To support the Belfast Agenda, the council has prepared the Local Development Plan (LDP) draft Plan Strategy, which will guide future investment and development decisions to enable the sustainable spatial growth of the city up to 2035. The draft Plan Strategy, is guided by an overall vision, which provides an overarching context for the plan to ensure that economic, social and environmental issues are holistically considered to deliver sustainable developments up to 2035.
- 1.1.2 The council is committed to engaging with local communities and stakeholders and has sought to encourage inclusive discussions on the LDP and key planning policies that will guide future development to deliver the tangible social, economic and environmental benefits for the city. Public consultation was therefore an essential part of the plan making process.
- 1.1.3 This report summarises the participation process that has been undertaken in relation to the draft Plan Strategy in accordance with the Statement of Community Involvement (SCI)<sup>1</sup> and the Planning (Local Development Plan) Regulations (NI) 2015. It provides a summary of the key issues raised through the consultation process and an indication of the Council's view in relation to them. This report, alongside a full copy of the representations submitted as part of the consultation, will form a key part of the assessment of the soundness of the Plan Strategy when it is submitted to the Department for Infrastructure (DfI) in preparation for the independent examination.

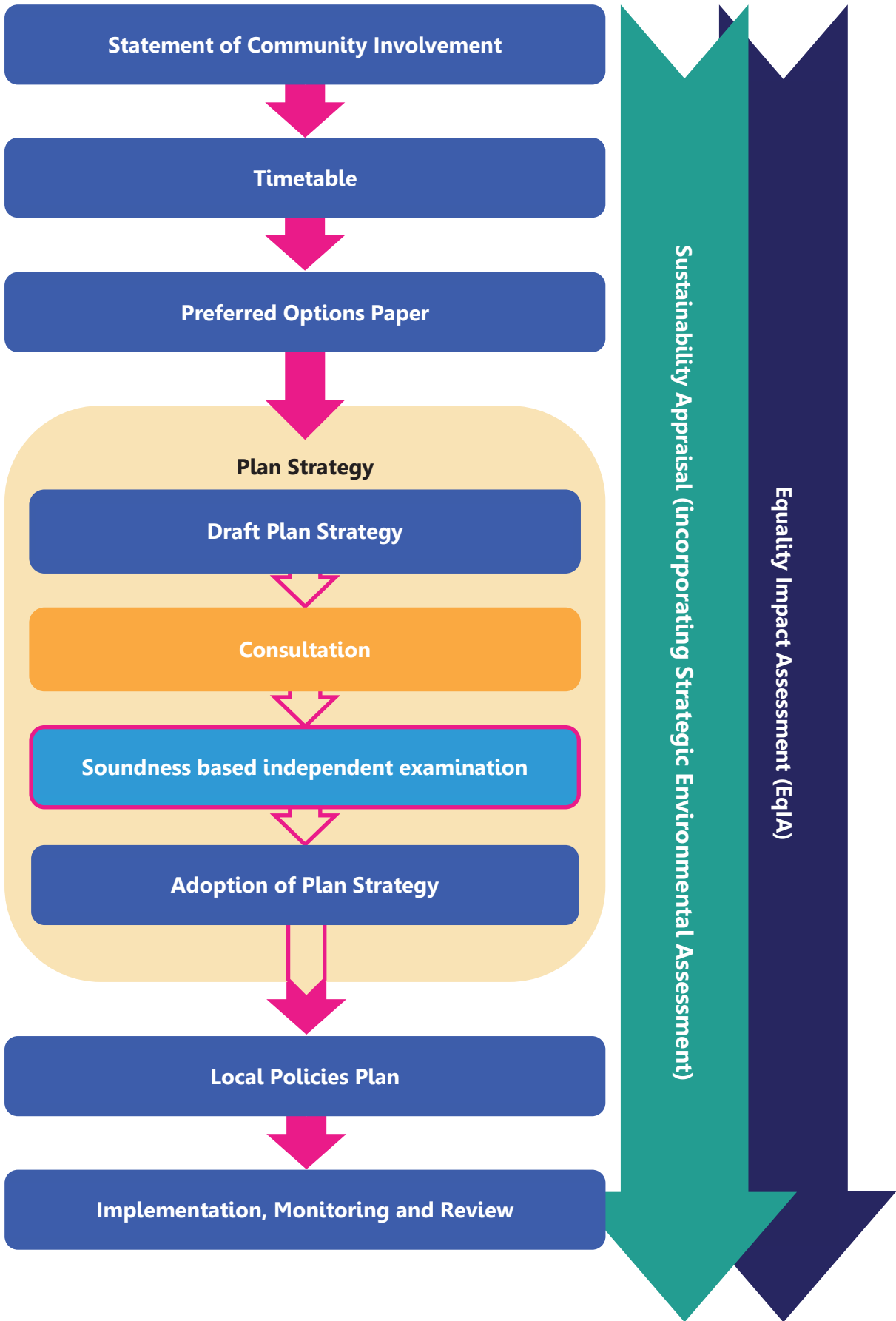
### 1.2 What is the Local Development Plan?

- 1.2.1 The LDP will outline the council's local policies and site-specific proposals for new development and the use of land in Belfast. Once complete, it will comprise of two development plan documents:
- 1. Plan Strategy** – The strategic policy framework for the plan area as a whole across a range of topics. It will set out an ambitious but realistic vision for Belfast as well as the objectives and strategic policies required to deliver that vision. Establishing this strategic direction early in the plan process will provide a level of certainty on which to base key development decisions in the area as well as the necessary framework for the preparation of the Local Policies Plan; and

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<sup>1</sup> The Statement of Community Involvement (SCI) was published in March 2018 and is available from: <http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/statement-community-involvement.aspx>





2. **Local Policies Plan** – The council’s local policies and site specific proposals in relation to the development and use of land in Belfast. It will contain the local policies, including site specific proposals, designations and land use zonings required to deliver the council’s vision, objectives and strategic policies, as set out in the Plan Strategy.

### 1.3 The Local Development Plan process

- 1.3.1 There are four key stages in the LDP process. The first was the initial plan preparation stage, which comprised the preparation of the plan Timetable and the council’s Statement of Community Involvement (SCI), alongside the preparation of a series of topic papers and the production of a Preferred Options Paper (POP). This POP provided the basis for consulting on a series of options for dealing with key issues identified in the plan area. A detailed report on the outcomes of this consultation process was published in July 2017<sup>2</sup> and forms part of the evidence base to inform the preparation of the subsequent development plan documents.
- 1.3.2 The second stage was the preparation of the draft Plan Strategy, another public consultation document and a key part of the public participation process. The Plan Strategy was therefore subject to a 12-week public consultation exercise, with documents made available four weeks in advance for the statutory 8 week consultation period. Following this initial consultation, the representations received were published and a further 8 weeks allowed for the submission of counter-representations. Following consideration of the representations and counter-representations, the draft Plan Strategy will then be submitted to DfI who will subject it to a soundness based independent examination. Following the examination, an advisory report of its findings will be issued to central government and a binding report then issued by central government requiring the council to formally adopt and publish the Plan Strategy as originally prepared, or with modifications.
- 1.3.3 The third stage is the preparation of the draft Local Policies Plan for public consultation. It will be consistent with the adopted Plan Strategy and will provide detailed land use proposals regarding the future development of Belfast. The Local Policies Plan will be subject to the same consultation and soundness based independent examination process as the Plan Strategy.
- 1.3.4 Once adopted, the Plan Strategy and Local Policies Plan will together be the principal consideration when determining future planning applications for development in the city. The fourth stage of the process will involve the regular monitoring and review of the performance of the LDP during the plan period.

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<sup>2</sup> *The Preferred Options Paper Public consultation Report (July 2017)* is available from: <http://www.belfastcity.gov.uk/nmsruntime/saveasdialog.aspx?IID=22988&slD=18628>

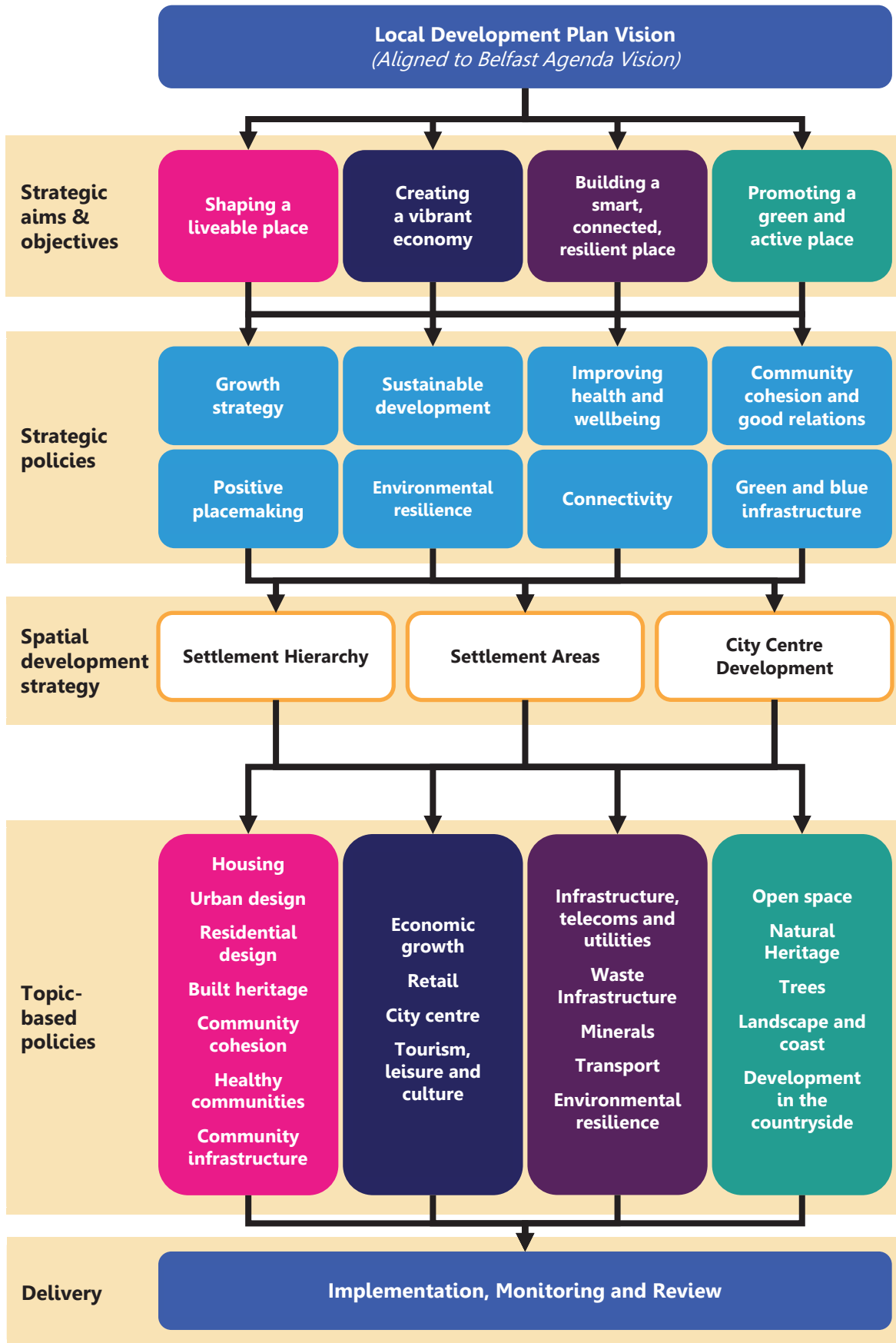
## 1.4 Draft Plan Strategy

1.4.1 The Plan Strategy consists of five parts, flowing from the overarching vision for the district:

- **Vision, aims and objectives:** The four strategic aims of the LDP closely reflect the Belfast Agenda priorities. These aims are supported by a series of strategic objectives designed to help achieve the delivery of the vision set out in paragraph 4.1.1
- **Strategic policies:** A series of overarching plan policies that embody the broad principles upon which the LDP is built. The overarching strategic policies are to be used as a guide to assist developers to deliver development proposals that are in line with the strategic objectives of the city.
- **Spatial development strategy:** Sets out how the council will manage the spatial growth for the plan area. It includes the hierarchy of settlements across the district, as well as the way the principal settlement of Belfast City will be identified into distinct 'settlement areas'. It also reflects the unique role the city centre plays and also the roles of other areas across the city should play in helping achieve the plan's strategic aims.
- **Topic-based policies:** This sets out a series of topic-based operational policies which help us deal with the land use challenges which affect Belfast. These policies will form the basis for making decisions on planning applications.
- **Delivery:** The final section is concerned with the delivery of the topic based policies providing details of how specific policies will be applied and proposals will be implemented. This is supported by a detailed monitoring framework which will assess the effectiveness of the policies in achieving the plan's aims for the future.

## 1.5 Draft Plan Strategy Public Consultation Report

1.5.1 This public consultation report details the engagement process undertaken in preparing and consulting on the draft Plan Strategy. It outlines the results of this process, including a summary of the key issues raised through representations in relation to each policy. It provides an indication of the Council's view in relation to the key issues and will form a key part of the evidence to be considered as part of the independent preparation for the independent examination. The detailed representations and counter-representations received are publicly available and can be read alongside this report.



## 1.6 Additional assessments

- 1.6.1 The LDP is supported by a series of formal assessments, which were also subject to public consultation in parallel with the initial 12-week public consultation on the draft Plan Strategy.

### **Equality Impact Assessment (EQIA)**

- 1.6.2 The EQIA considers how equality of opportunity can be promoted through the implementation of the LDP. The draft EQIA report considers how each policy might have an effect on the statutory groups set out in Section 75 of the Northern Ireland Act 1998 and, in addition, any potential impacts on good relations, having regard to the scope of the LDP and the key inequalities that the LDP can influence.
- 1.6.3 The EQIA of the new Belfast LDP is being carried out in three phases, in alignment with the development plan process. The first phase EQIA was alongside the Preferred Options Paper (POP) and was completed in July 2017. The second (current) phase EQIA is on the draft Plan Strategy. The draft EQIA will be finalised following public consultation and the adoption of the Plan Strategy. It will also help to shape equality assessment going forward in the third phase of the LDP process – the Local Policies Plan.

### **Sustainability Appraisal (SA)**

- 1.6.4 A Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a LDP. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met.
- 1.6.5 The Sustainability Appraisal report also incorporates the requirements of the EU Strategic Environmental Assessment Directive and the provision of a Strategic Environmental Assessment (SEA).

### **The Habitats Regulations Assessment (HRA)**

- 1.6.6 The Habitats Regulations Assessment (HRA) is required by The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended). It provides an appropriate assessment of the likely effects on environmentally sensitive sites in Northern Ireland, such as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, either alone or in combination with other plans or projects. It has been undertaken by the Shared Environmental Service on behalf of Belfast City Council in respect of the Belfast Local Development Plan 2035 in accordance with the Habitats Directive (Council Directive 92/43/EEC).

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### Rural Needs Assessment

- 1.6.7 The Rural Needs Act (NI) 2016 (the Act) provides a statutory duty on public authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services.
- 1.6.8 The purpose of the Act is to ensure that public authorities have due regard to the social and economic needs of people in rural areas when carrying out certain activities and to provide a mechanism for ensuring greater transparency in relation to how public authorities consider rural needs when undertaking these activities.

## 1.7 Structure of this report

- 1.7.1 This draft Plan Strategy consultation report is structured as follows:
- **Chapter 2: Consultation** – provides an overview of the consultation exercise, including our approach to engagement, communication methods and the key outcomes;
  - **Chapter 3: Overview of responses** – provides a high level summary of the responses received, our approach to the analysis of those responses and a summary of the key issues raised;
  - **Chapter 4: Council response to key issues raised** – provides a more detailed summary of the key issues raised in relation to each specific policy or section of the draft Plan Strategy, alongside an indication of the Council’s view on those issues;
  - **Chapter 5: Sustainability appraisal responses** – provides a summary of the key issues and responses to the comments made in relation to the Sustainability Appraisal;
  - **Chapter 6: Draft Habitats Regulations Assessments responses** – provides a summary of the responses submitted in relation to the draft Habitats Regulations Assessment; and
  - **Chapter 7: Errors and suggested minor modifications** – contains sections contain a number of typographical and drafting errors identified by respondents and ongoing internal review processes, as well as a number of what are considered to be minor changes which add clarity in some areas but which are not of significance, either individually or cumulatively, in terms of the soundness of the plan.

# Consultation



### 2.1 Engagement process

2.1.1 Broad participation is an important part of the process of preparing the new Local Development Plan for the city. The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 state that the Council must provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place.

#### **Local Development Plan Steering Group**

2.1.2 In accordance with the SCI, the Council established an LDP Steering Group as a high-level co-ordinating body to ensure overview and strategic input on behalf of the whole community, as well as from planning professionals. Membership of the group comprised of council Members, with the Chief Executive, Director of Planning and Building Control or Planning Manager and representatives from key statutory partners, including:

- Department for Infrastructure (DfI);
- Department for Communities (DfC);
- Department of Agriculture, Environment and Rural Affairs (DAERA); and
- Department for the Economy (DfE).

#### **Project management team**

2.1.3 A group comprising senior council officers established to oversee the development of the Plan, to support and advise the LDP Steering group and ensure key consultees co-operate in the plan making process.

#### **Metropolitan Area Spatial Working Group (MASWG)**

2.1.4 Alongside this, the surrounding councils within the wider Belfast metropolitan area were invited to form a Metropolitan Area Spatial Working Group (MASWG) along with DfI and other statutory representatives. The MASWG provides a forum for cross-boundary issues to be discussed along with the broader LDP development process. The MASWG membership was made up of both officers and political representatives and provides an opportunity to discuss shared and mutual interests.

#### **Thematic working groups**

2.1.5 Following the consultation on the POP, the Council also established a series of thematic working groups to bring together key stakeholders and ensure the coordination of the activity required to support the preparation of the LDP for Belfast. The working groups involved representation from key stakeholders, such as statutory partners and representative bodies, and provided a forum to:

- Gather information, views and details from a wide representation of stakeholders in order to maximise collaboration and build a consensus to provide the evidence base for the development of the Plan Strategy;
- Contribute to drafting the final LDP;
- Contribute to the LDP process through effective participation to ensure work is initiated and maintained in a timely manner to progress the Plan; and



- Provide a platform to inform sub-regional issues such as infrastructure and facilitate involvement from adjoining authorities.

2.1.6 The working groups established related to the following thematic areas:

- Population and Housing;
- Urban Design, archaeology and built heritage;
- Economy and retail;
- Transport and infrastructure;
- Waste;
- Water and sewerage;
- Minerals;
- Environmental resilience; and
- Green and active (open space, natural heritage, landscape and coast, etc.).

### **Consultation process**

2.1.7 In line with our Statement of Community Involvement, the draft Plan Strategy and supporting evidence was made available four weeks in advance for the statutory 8 week consultation period. The draft Plan Strategy was therefore published on 23 August 2018, with the formal consultation period running from 20 September 2018 to 15 November 2018.

2.1.8 During this time the plan team completed 66 engagement events to promote consultation and encourage engagement with the draft Plan Strategy. Through this process we sought to demonstrate how policies had evolved from the POP stage of the LDP development in response to consultation. This way of working was well received at POP stage and throughout the subsequent engagement sessions for the draft Plan Strategy. A full breakdown of these events is contained at Appendix A, but in brief can be summarised as follows:

- Two consultation launch events in City Hall, marking the publication of the Plan Strategy and the start of the formal consultation period;
- Four public area events based in north, south, east and west of Belfast;
- A public drop-in session in City Hall;
- Two MASWG meetings;
- 13 thematic working group workshops;
- 36 stakeholder consultations (including meetings with adjacent councils);
- Engagement with under-representative groups via the Senior's Forum, Youth Council, Shared City Strategic Partnership, Equality Consultative Forum and Equality Commission;
- Internal staff meeting and events; and
- Regular meetings with the LDP Steering Group and statutory consultees.

2.1.9 Following the draft Plan Strategy consultation, a copy of all of the representations received during the public consultation were published on 1 March 2019, with an

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opportunity to submit counter representations provided until 12noon on 26 April 2019.

## 2.2 Communication

### Consultation materials

2.2.1 Throughout the engagement process materials were required to promote and inform audiences in relation to the LDP generally, the draft Plan Strategy and the soundness based consultation process. These included:

- Draft Plan Strategy 2035 - full document;
- Draft Plan Strategy summary consultation document;
- 'Help shape the future of Belfast' Information leaflet;
- Promotional pop-ups; and
- Consultation response form.

2.2.2 A range of supporting studies, background papers and technical supplements were also prepared and published alongside the draft Plan Strategy providing the evidence to justify the policies proposed within the LDP. These documents included:

- Equality Impact Assessment (EQIA);
- Sustainability appraisal incorporating Strategic Environmental Assessment (SA/SEA);
- Habitat Regulations Assessment (HRA);
- 17 Technical Supplements:
  1. Population;
  2. Housing;
  3. Employment and economy;
  4. Belfast city centre and retailing;
  5. Tourism;
  6. Urban design and built heritage;
  7. Natural heritage;
  8. Open space, sport and outdoor recreation;
  9. Flood risk;
  10. Public services (health, education and community);
  11. Minerals;
  12. Development in the countryside;
  13. Renewable energy;
  14. Transportation;
  15. Public utilities;
  16. Environmental Issues; and
  17. Transitional plan period designations (including a series of 30 Maps associated with each designation).

- Supporting studies, including:
  - Housing Market Analysis update, Belfast City Council Area, NIHE, September 2017;
  - Housing growth options report – Belfast City Population and Housing Growth Study, Turley, October 2016;
  - Size and type of housing needed – addendum to the Belfast City housing growth options report, Turley, November 2017;
  - Residential densities: A comparative study, April 2017;
  - Belfast City Council – Urban Capacity study, Arup, March 2018;
  - Belfast Housing Land Availability (Housing Monitor) for 2015-2016, 2016-2017 and 2017-2018, Belfast City Council;
  - Retail and leisure capacity study 2035, Braniff Associates, September 2017;
  - Office sector study, August 2018;
  - Assessing employment space requirements, Ulster University Economic Policy Centre, September 2016;
  - Rural Needs Impact Assessment, August 2018; and
  - Countryside Assessment, August 2018.

2.2.3 This full range of consultation materials was made available to view and download online via Belfast City Council’s website and were available for inspection between the hours of 9am and 5pm from the Council’s office:

Belfast City Council, Planning Service, Cecil Ward Building, 4-10 Linenhall Street, Belfast, BT2 8BP.

2.2.4 Following the draft Plan Strategy consultation, a copy of all of the representations were published on the Council’s website and made available for inspection at the Council’s office at the address and during the times listed above. Alongside the representations submitted to the draft Plan Strategy, the representations submitted in relation to the EqIA, SA/SEA and HRA were also published. These representations were all accompanied by explanatory notes, a supporting ‘Frequently Asked Questions’ document and counter-representation response form.

2.2.5 All of these consultation materials remain available for inspection on the LDP pages of the Council’s website.

### **Communication channels**

2.2.6 A range of communications tools were used throughout the consultation period, integrating traditional and digital channels, 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.

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- Digital communications:
  - Belfast City Council website;
  - Online map viewer;
  - Animated explainer video;
  - Social media – Facebook, Twitter and Instagram; and
  - Email mailing list.

### Newspaper advertising

2.2.7 In line with the requirement of the SCI a public notice relating to the publication of the draft Plan Strategy was issued for two consecutive weeks, appearing during the weeks commencing 20 August 2018 and 27 August 2018 in the following newspapers:

- Belfast Gazette;
- Irish News;
- Newsletter;
- Belfast Telegraph; and
- Andersonstown News.

2.2.8 Upon publication of the counter representations a further set of public notices were published in the same newspapers during the week commencing 25 February 2019 and week commencing 4 March 2019.

### Publications

2.2.9 Council publications were used to inform staff and residents throughout Belfast of the LDP process and draft Plan Strategy consultation period. This included 'City Matters' magazine, published five times a year and delivered to all Belfast residents, and Intercom, a bimonthly staff magazine.

### Press releases

2.2.10 Two press releases were circulated to media outlets alongside the publication of the draft Plan Strategy on 23 August 2018 and to mark the start of the formal consultation period on 20 September 2018. Significant media interest was also generated during the consultation period, resulting in a range of articles in both digital and hard copy publications, including:

- 'Communities must shape new Belfast Local Development Plan – Ní Chuilín', 23 August 2018, [Sinn Féin](#);
- 'Next stage of Belfast's Local Development Plan unveiled' 24 August 2018, [Gravis Planning](#);
- 'Belfast plans nearly 32,000 homes by 2035', 24 August 2018, [Property Week](#);
- 'Belfast draft local plan includes anti-sectarian 'community cohesion' policy', 24 August 2018, [Planning Resource](#);
- 'Draft local plan strategy for Belfast published' 24 August 2018, [The Planner \(RTPI\)](#);
- 'Belfast City Council launches draft Plan Strategy, 24 August 2018, [Pragma Planning](#);

- 'Belfast LDP consultation events', 18 September 2018, [NI Environment Link](#);
- Consultation event information, 19 September 2018, Volunteer Now;
- 'Plans unveiled for next stage of Belfast's Local Development Plan', [Women in Business](#);
- 'Blueprint for Belfast's growth proposes rezoning business space for leisure and residential use', 21 September 2018, [Belfast Telegraph](#);
- Belfast LDP featured in discussion on the BBC Radio Ulster Talkback, 27 September 2018;
- Volunteer Now Newsletter, 1 October 2018, Volunteer Now;
- 'Presentation of the Belfast Local Development Plan - Draft Plan Strategy', 4 October 2018, [Royal Society of Ulster Architect \(RSUA\)](#);
- 'Belfast Local Development Plan', 12 October 2018, NIFHA event presentation, [NI Federation of Housing Associations \(NIFHA\)](#);
- 'Belfast Local Development Plan: draft Plan Strategy', 15 October 2018, [Turley](#);
- 'Belfast City Council Draft Plan Strategy - Where is it in the system?', 23 October 2018, [Brown O'Connor Communications](#);
- 'Presentation to Members – Belfast Local Development Plan – Wed 24 October – Wellington Park Hotel 7pm', 18 October 2018, [LANI](#);
- 'CIH NI response to BCC draft plan strategy', 15 November 2018, [Chartered Institute of Housing](#);
- Consultation event information, 1 November 2018, NI Council for Voluntary Action (NICVA);
- 'Federation submits its response to Belfast City Council's draft Developer Contributions Framework', 2 November 2018, [Construction Employers Federation \(CEF\) NI](#); and
- 'Belfast must show greater ambition in plan for future' 20 November 2018, [Belfast Telegraph](#).

### **Belfast City Council website**

2.2.11 A dedicated webpage<sup>3</sup> was created on the council website containing digital copies of all the consultation materials. The LDP also featured on the Belfast City Council website homepage banner for four separate periods during the consultation period. Over the entire period of the consultation there were 5,190 unique page views to the LDP landing page, with the draft Plan Strategy and Summary document downloaded 1,918 times and 598 times respectively.

### **Online Map viewer**

2.2.12 Alongside Technical Supplement 17: Transitional plan period designations and its associated series of 30 map booklets, a digital map viewer was provided to allow public viewing of the existing zonings and designations of relevance to the draft Plan Strategy. This portal allows users to layer different zonings and designations against a detailed base map in different areas of the city.

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<sup>3</sup> [www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)

### Explainer videos

2.2.13 A video of the Lord Mayor was recorded on the day of the launch and an animation video was developed to let people know about the LDP, draft Plan Strategy and about soundness tests, the basis on which representations will be considered at the independent examination. The second of these videos was shared extensively online, with 8,253 views recorded through the Council's social media channels (see below for more details).

### Social media

2.2.14 Social media tools were used to maximise the audience reach, these included Facebook, Twitter, LinkedIn and YouTube channels, using '#BelfastLDP'. Analysis of social media analytic data shows a reach of c. 3.5million user accounts<sup>4</sup>, including both the Council's own material and posts created by, and shared with, others. These posts sought to notify people of the consultation details, advertised key events and provided links to the explainer videos (see above). This social media activity can be summarised as follows:

Social Media Chanel	Activity	Reach
Facebook	12 Posts	Combined reach of 42.6K Generated 4,842 video views
Twitter	33 Tweets	Generated 1,044 video views
LinkedIn	6 Posts	Generated 2,120 video views
YouTube	Explainer video published	Generated 247 video views (includes views of video embedded on the Council website)

### Email mailing list

2.2.15 The Council's LDP webpages provide an opportunity for people and organisations who wish to keep up to date on the progress on the LDP to register to receive regular LDP emails. During the draft Plan Strategy consultation period, emails were circulated to this mailing list as follows:

- [Belfast City Local Development Plan 2035, 24 October 2018, highlighting the publication of the draft Plan Strategy;](#)
- [Hear more about our Belfast Local Development Plan, 11 September 2018, advertising public consultation events; and](#)
- [Belfast Local Development Plan draft Plan Strategy closes at 5pm on Thursday 15 November 2018, 9 November, 2018, highlighting closing dates for consultation.](#)

2.2.16 In relation to the counter-representations consultation, an additional email was sent on 25 February 2019 notifying recipients of the publication of representations and the closing date/time for counter representations.

<sup>4</sup> This can include material viewed or shared multiple times by the same accounts.

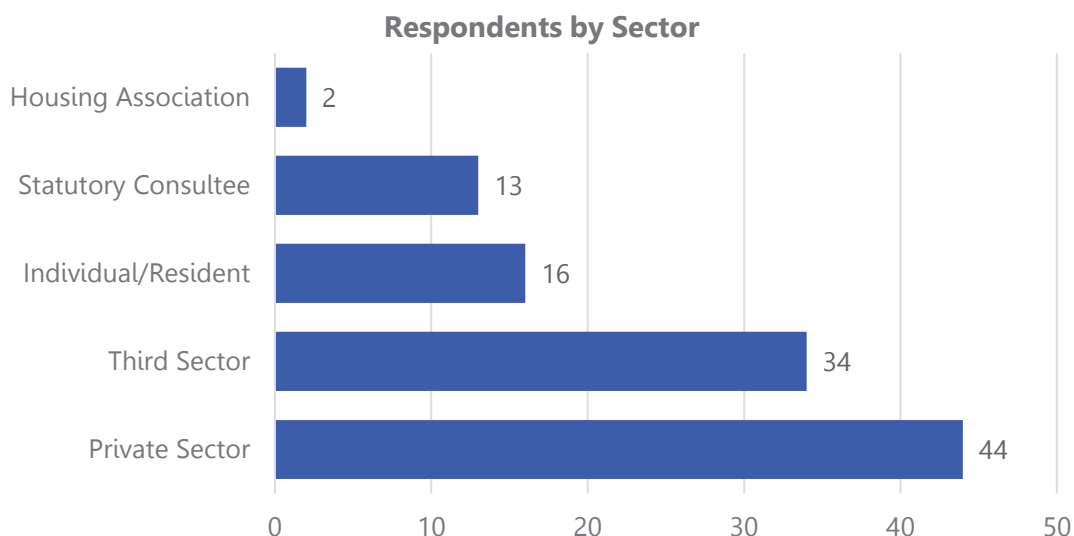


# Overview of Responses



### 3.1 Summary of responses received

3.1.1 109 representations were received during the consultation period for the draft Plan Strategy. No representations were received before the formal consultation period commenced in September. Three responses were received after the 5pm consultation closure and as such were not accepted as valid responses. A list of all organisations, individuals and other interested parties who submitted valid representations is contained at Appendix B. A copy of all the responses are available to view on the Council's website.



3.1.2 In summary, 40% of responses were received from private sector organisations and just over 30% from community and voluntary sector organisations and interest groups (the 'Third' sector). The remaining 30% consisted of responses submitted by statutory consultees, individuals or residents and housing associations. 17 representations found the draft Plan Strategy sound and 65, found it unsound and 27 representations provided no summary position.

### 3.2 Approach to analysis of responses

3.2.1 The consultation response form was designed in accordance with Development Plan Practice Note 9: Submission and handling of representations and was intended to ensure that all responses provided the information necessary to inform the independent examination. However, a large proportion of respondents chose not to utilise the form when submitting their response, meaning that it was not always possible to accurately ascertain the intention of the comments with respect to:

- Whether a respondent was supporting or objecting to the draft Plan Strategy;
- Which section, policy or paragraph number the comments relate to; and
- The relevant soundness test(s) to which an objection would relate.



- 3.2.2 To ensure no bias in the information presented, the Council made no assumptions with regard to respondents' views on the soundness of the plan or which soundness test(s) specific comments would relate to. Given the number of gaps in relation to the soundness tests in particular, limited information has been included on the relevant soundness test(s) as part of this consultation report. However, it should be noted that all soundness tests have been referenced by respondents as a whole and no single soundness test appears to have more prominence than the others.
- 3.2.3 In processing and analysing responses, the Council did however make a reasonable judgement as to the most relevant section or policy of the draft Plan Strategy a comment related to where it is not immediately clear from the response. The information presented in this report therefore reflects these assumptions, which are useful for broad analysis. The following sections of this report follow the overall structure of the draft Plan Strategy, with the main issues summarised in relation to each section or policy. The Council have then provided an initial response to these broad issues to help inform discussions as part of the independent examination process. Where the Council's response refers to a report or study which does not form part of the technical supplements and studies published alongside the DPS, it is provided at Appendix D.
- 3.2.4 Given that this information is presented in summary form, it is recognised that it has not been possible to address all issues and specific nuances in relation to particular issues as contained in individual comments. Nevertheless, this provides a broad indication of the key issues that will need to be considered as part of the independent examination. The detailed responses, without any assumptions, will be submitted to DfI and made available to the Planning Appeals Commission (PAC) to ensure no unintended bias arising from these assumptions and that all comments received will be adequately considered during the independent examination process.
- 3.2.5 Where respondents had not used the formal consultation response form, it was not clear whether a respondent wished that their response to be published anonymously and/or whether they wished to provide oral evidence as part of the independent examination or were content to be involved via written representation only. Where necessary, respondents were therefore contacted to provide clarification on these points. The responses were therefore redacted and published as required in accordance with these responses and this information will be submitted to DfI and the PAC, in accordance with data protection requirements, to be made available as part of the independent examination process.

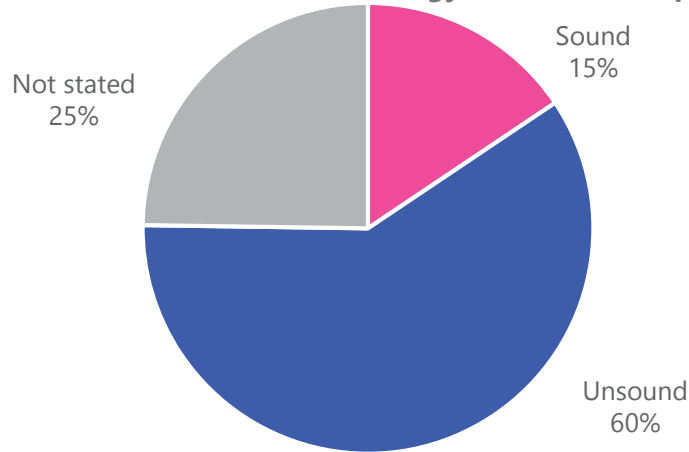
### 3.3 Summary of key issues raised

- 3.3.1 As shown in the chart below, 15% of respondents overtly stated that they felt the draft Plan Strategy was 'sound' and almost two thirds (60%) of respondents

## Overview of responses

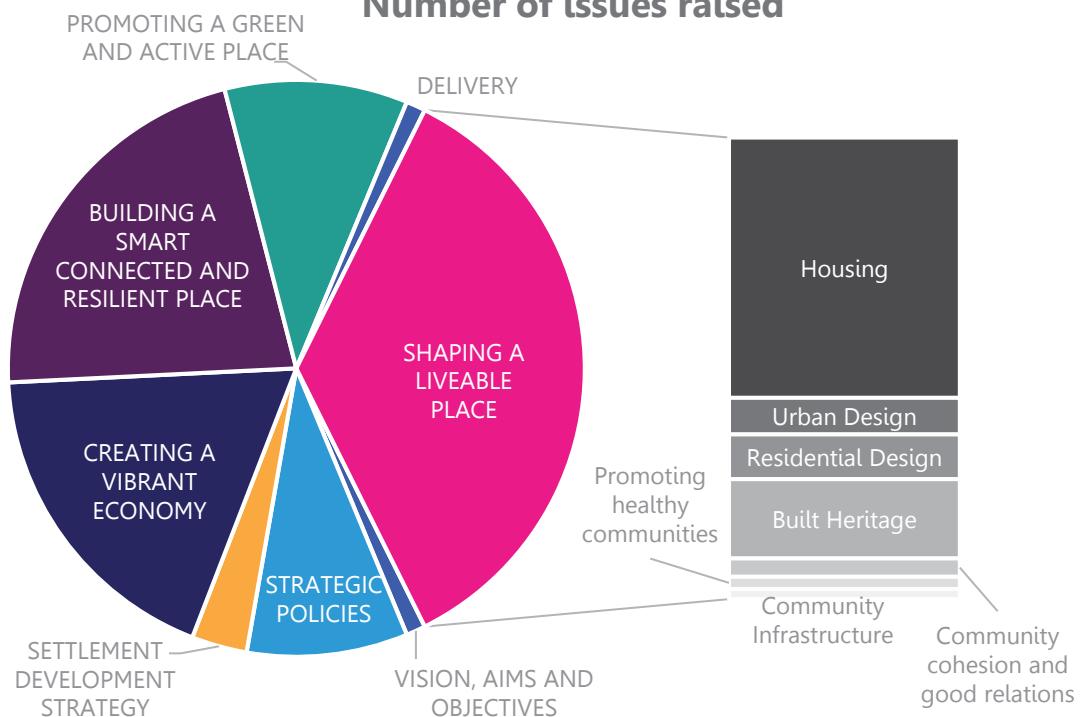
suggested that the draft Plan Strategy was 'unsound'. As noted above, a quarter of respondents didn't specifically state whether they felt the Plan Strategy as a whole was sound or unsound.

**Soundness of the draft Plan Strategy as stated in responses**



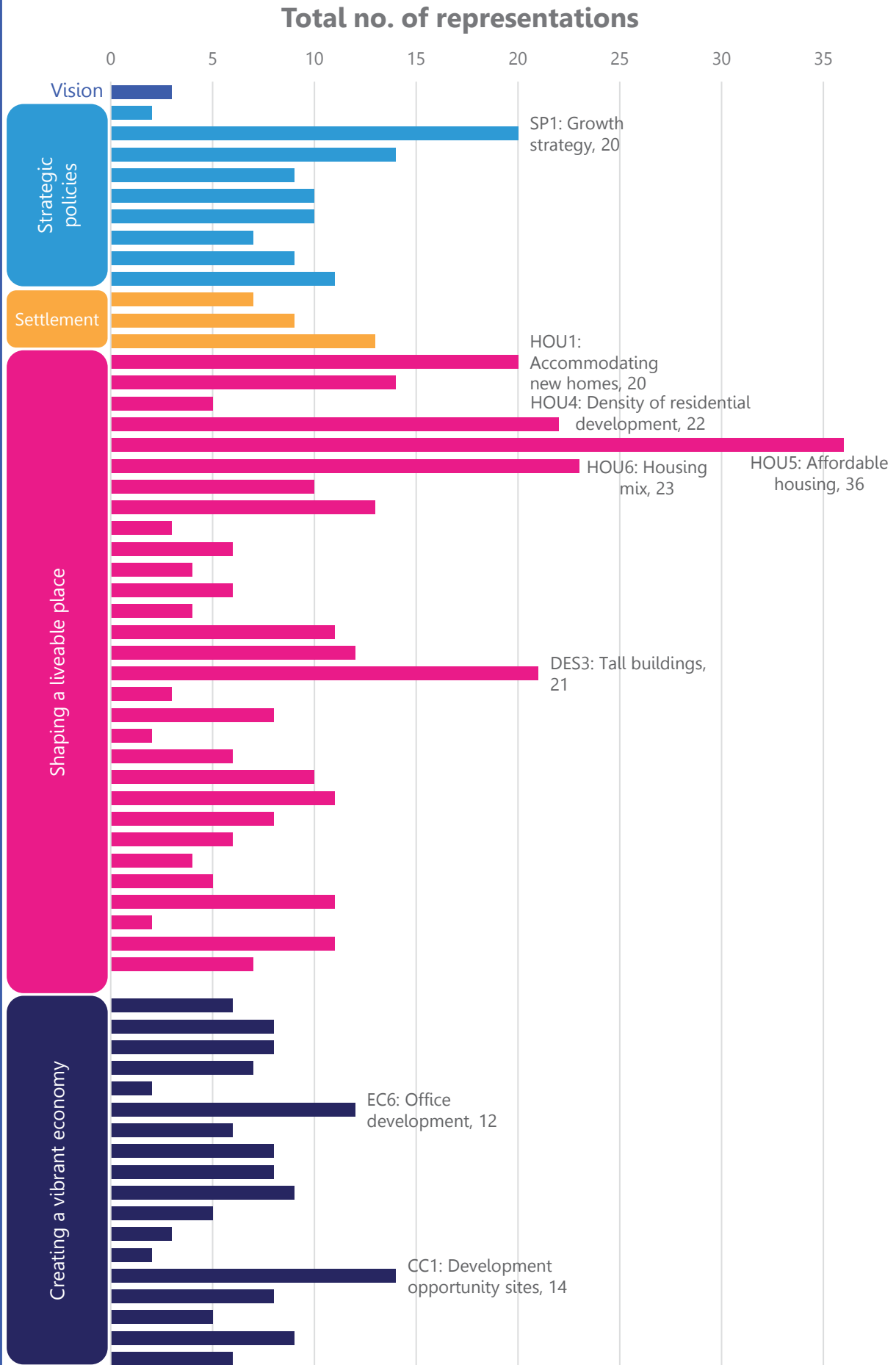
3.3.2 When distilling specific issues raised from representations submitted, over one third (227 issues or 35%) of all issues related to the 'Shaping a liveable place' section, with around two thirds (66%) of those issues relating to the housing and residential design policies. A number of the issues raised in relation to housing also related to the growth aspirations of the plan, with an additional 9% of all responses relating to the Strategic Policies, most notably, the growth strategy (Policy SP1). The main concern in this regard related to the growth aspirations and associated housing requirements being too ambitious and unrealistic.

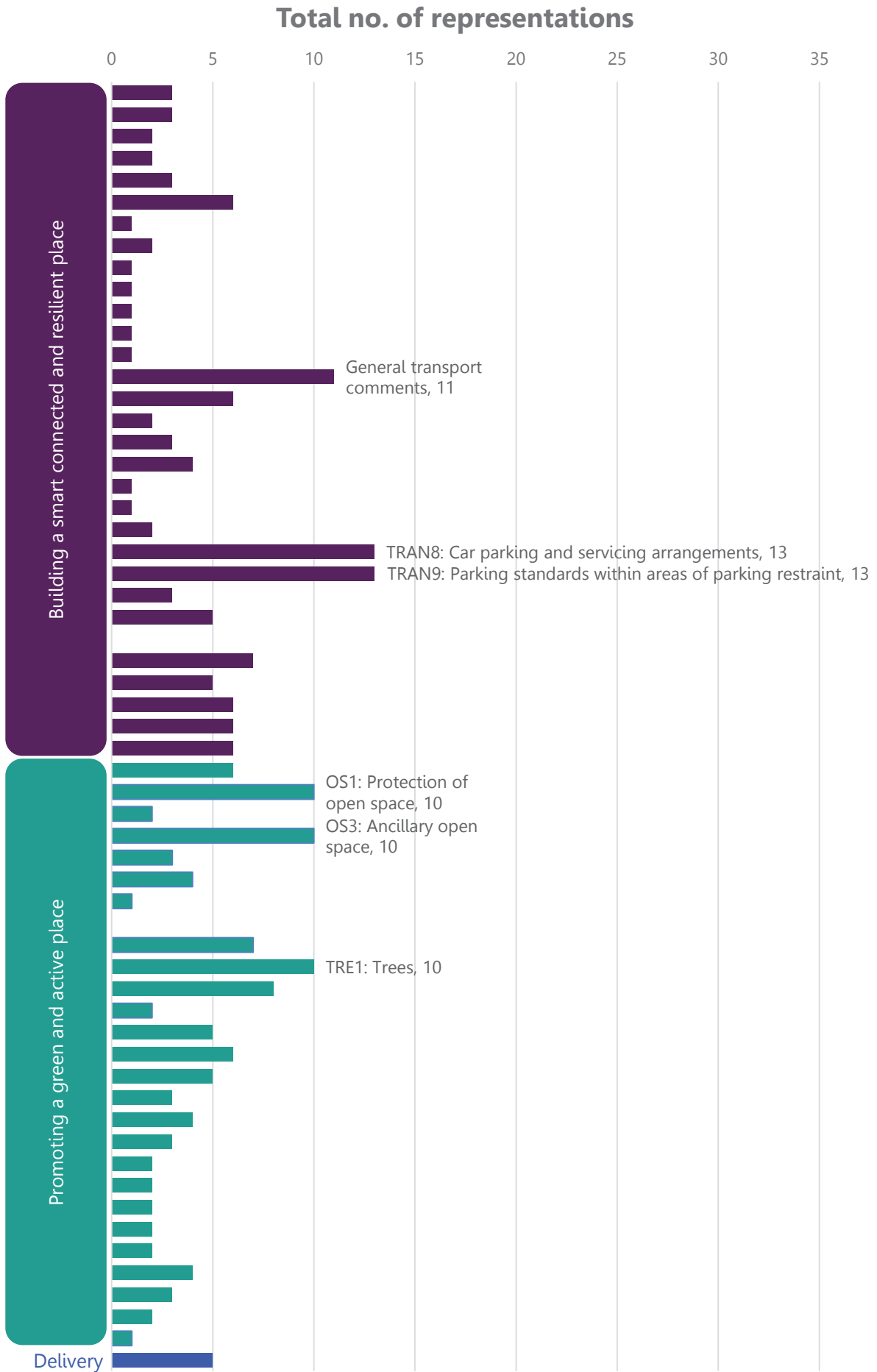
**Number of issues raised**



- 3.3.3 Of the remaining comments submitted, 140 of the issues (22%) raised related to the 'Building a smart connected and resilient place' section. Of these, half of the issues related to the transportation policies, with the infrastructure and environmental resilience policies were each subject to just under 30 issues being raised. Many of the issues raised related back to the lack of up to date evidence with respect to transportation issues and infrastructure considerations associated with the ambitious growth aspirations of the Plan.
- 3.3.4 118 issues (18%) were raised in relation to the 'Creating a vibrant economy' section, of which 44% related to the retail policies and 41% to the economic development policies. 66 issues were raised in relation to the 'Promoting a green and active place' section, with almost one third relating to open space provision, just under 30% relating to the landscape and coast and a further 30% to development in the countryside. A small number of comments also related to the overarching vision, aims and objectives, the settlement strategy and the delivery sections.
- 3.3.5 The charts on the following pages provide a breakdown of the total number of representations relating to each policy, with those likely to form part of the focus for the independent examination highlighted.
- 3.3.6 Based on this high level analysis, the Council would summarise the main issues to be considered in relation to the Plan as follows:
- **Growth strategy:** whilst there is broad support for the approach of linking housing growth to economic and employment growth and wide recognition of Belfast's important role as the driver of the regional economy, a number of concerns were raised in relation to:
    - The cumulative impact of growth alongside the growth proposed by other councils within the wider Belfast Metropolitan Urban Area;
    - Technical questions regarding the methodology for the underpinning Housing Growth Study;
    - Lack of recognition that the functional Housing Market Area is broader than Belfast's district;
    - Whether the scale of growth proposed is realistic and deliverable; and
    - The wider impact on the wider transport and infrastructure networks.
  - **Windfall Housing:** Suggestion that the windfall allowance is too low and that the proposed policies will encourage higher levels of unplanned windfall development;
  - **Affordable Housing:** Concern that affordable housing policies will render housing development unviable and concern over whether the appropriate mechanisms exist to ensure delivery.
  - **Transport infrastructure:** A number of issues were raised in relation to transport generally, including:
    - The absence of an up to date Transport Plan/Strategy;

## Overview of responses





## Overview of responses

- Lack of capacity in the existing transport networks;
  - Lack of reference to the need to change how people travel to enable planned growth to be delivered in line with the other Council objectives; and
  - No recognition of the existing Parking Strategy and need for enhanced demand management.
  - **Broader Infrastructure networks:** A number of issues were raised in relation to transport generally, including:
    - The absence of Infrastructure Plan to clarify how required infrastructure will be provided; and
    - Lack of capacity in wastewater treatment
- Cross-boundary engagement:** Suggestion of a lack of engagement and cooperation with our adjoining councils, of which two made representations indicating that they considered the plan unsound.

## 3.4 Equality monitoring

- 3.4.1 As noted above, an EQIA has been carried out in relation to the draft Plan Strategy in order to promote equality of opportunity throughout the LDP process.
- 3.4.2 In addition, the Council worked to ensure that the draft Plan Strategy consultation targeted a wide range of groups representing s75 groups. This included engagement with:
- Belfast Senior's Forum;
  - Youth Council;
  - Shared City Strategic Partnership;
  - Equality Consultative Forum; and
  - Equality Commission.
- 3.4.3 We also carried out equality monitoring in relation to the responses received to the consultation, which is summarised at Appendix C. The equality monitoring questions were voluntary and so we are only able to report on those who have completed these sections. Less than 45% (48) of the 110 responses submitted had associated equality monitoring questions completed, meaning that data is unavailable for over half of the respondents.

# Council response to key issues raised



## Council response to key issues raised

### Vision, Aims and Objectives

#### Summary of Responses

**Three respondents** provided comments in relation to Chapter 4, which can be summarised as follows:

- One respondent commented that they were supportive of the vision set out in the LDP.
- One respondent commented that there should be commitment to positive action such as demand management.
- A respondent stated that land in accessible locations should be prioritised to promote sustainable transport.

#### Respondents Received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-U4-M</a>	Sustrans, Northern Ireland

Reference	Respondent
<a href="#">DPS-A-6Z-U</a>	Individual

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent stated that there was not a commitment to positive action such as demand management.	Demand management action is covered in Policy TRAN 9 which focuses on controlling the amount of non-operational parking within areas of parking restraint in the city centre and fringe area. Further designations will be considered in the local policies plan in commercial areas outside the city centre. A minor amendment can be made to strengthen this commitment within the strategic aims and objectives section ( <b>see minor modifications table</b> ).
A comment was made that policy should be strengthened to prioritise land in accessible locations to promote the use of sustainable transport.	A key objective under the Building a Smart Connected and Resilient Place theme is to ensure availability of land to facilitate sustainable patterns of development and promote travel by more sustainable modes of transport.
Concern was expressed that the dPS does not bring together policies, measures &	It is considered that the Strategic Policies section introduces overarching policies to



Main Issue	Council Response
mechanisms supportive of overall vision for city.	support the overall vision of the draft Plan Strategy.
The Vision set out in the Plan was welcomed for Belfast to be “a globally successful, smart regional city that is environmentally resilient with a vibrant economic and social heart”.	BCC welcome support for this policy approach.
A change in wording was requested in relation to car parking, to change 'suitable' to 'appropriate'.	A minor amendment to wording to use the terminology 'appropriate' rather than 'suitable' can be made without affecting the soundness of the plan. <b>See minor modifications table.</b>
One respondent stated that the Vision did not taken account of dPFG indicator 25: 'Increase the use of public transport and active travel'. It was suggested that all planning must put this Indicator at the forefront of transport provision and actively discourage car use.	Technical Supplement 14 refers to the dPFG indicator 'increase the use of public transport and active travel' as informing the draft plan strategy approach. The dPS contains a range of policies to deliver sustainable patterns of development, which reduce the need for motorised transport and prioritise active travel and travel by public transport.
A comment was made relating to inclusive growth and the need for access to public transport.	The dPS recognises the benefits of a good public transport system for the city. It contains a range of policies to deliver sustainable patterns of development, which reduce the need for motorised transport and prioritise active travel and travel by public transport.

## Council response to key issues raised

### Strategic Policies

#### Summary of Responses

Comments were received that related to all eight of the strategic policies, suggesting that these read more like broad objectives or themes than policies and that the order of these suggested growth was being prioritised above all other strategic considerations, including sustainable development. However, it was acknowledged that the strategic policies as a whole provide positive aspirations and address important strategic considerations.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8N-H</a>	Lisburn & Castlereagh City Council (LCCC)

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link (NIEL)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>All Strategic Policies</b>	
<p>Comments were received that related to all eight of the strategic policies, with specific implications for Policy SP1. One respondent suggested that the strategic policies read more like broad objectives or themes than policies, whilst others were concerned that the order of these suggested growth was being prioritised above all other strategic considerations, including sustainable development. However, it was acknowledged that the strategic policies as a whole provide positive aspirations and address important strategic considerations. Further comments suggested the strategic policies fail the coherence and effectiveness soundness tests as it is unclear how the subsequent topic based policies relate to the strategic policies.</p>	<p>General support for the intent of the eight strategic policies is welcome.</p> <p>The strategic policies represent eight key cross-cutting issues that are applicable to all development and therefore sit alongside the topic based policies within the rest of the Plan Strategy. They are not intended to have any form of hierarchy and so the order in which they appear has no bearing on how important one policy is considered in relation to the others.</p> <p>The nature of the different policies and their roles mean that there is no inconsistency between the strategic policies and the topic-based operational policies that follow.</p>

## Policy SP1 – Growth strategy

### Summary of Responses

20 respondents provided comments in relation to Policy SP1. The comments included:

- Suggestion that the **strategic policies** read more like broad aims than policies and that they should be re-ordered to reflect prioritisation;
- **Support** for proposed growth strategy, noting that the ambitious growth aligns with the RDS objective to grow the City of Belfast and would help Belfast drive the regional economy;
- Some respondents suggested that the **growth ambitions are unrealistic or unsustainable** when read in the context of current house build rates. In contrast, other respondents suggested use of the **higher housing figure** of 37,000 units from the Preferred Options Paper (POP) to provide greater flexibility;
- The growth strategy conflicts with regional planning aims and the Regional Development Strategy (RDS) as they **exceed the stated Housing Growth Indicator (HGI)** for the District;
- Comments in relation to the **cross-boundary implications** of the growth strategy on the Belfast Metropolitan Area / functional housing market area. There was also reference to the cross boundary implications of **employment growth**, including the need to assess employment land supply across the wider BMA and considering the regional role of Sprucefield and its implications for Belfast's retail strategy;
- The need for integration between transportation and land-use planning, suggesting a need for additional evidence to show how the **transport network** has been considered as a facilitator for growth in absence of an up to date Transport Plan. However, it was acknowledged that the transport elements broadly align with the strategic direction of the draft Programme for Government, the RDS and the current regional approach to transportation;
- **Infrastructure** concerns or a lack of evidence as to how infrastructure requirements would be met. This referred primarily to waste water and sewerage infrastructure, although infrastructure generally was referenced in more general terms within a number of comments, as was community infrastructure (health, education, etc.);
- Suggestion that additional detail was required in relation to the potential need to **phase development** to align with infrastructure provision; and
- Concerns in relation to the **zoning of land**, including a lack of flexibility in the zoning of land that is already available for development and queries regarding how the allocation of land will correlate with areas of housing need.

A number of respondents questioned the soundness of the evidence base in relation to population forecasts, housing growth, transport and infrastructure capacity, employment land availability and social/environmental infrastructure. A number of suggestions were made in relation to additional evidence required to make the Plan Strategy sound.

## Council response to key issues raised

Miscellaneous issues were also raised in relation to access for local communities to new employment opportunities and the need for interventions to deliver benefits for existing residential areas. One respondent complained that their comments made in response to the Preferred Options Paper consultation regarding compliance with the RDS had not been taken into account within the draft Plan Strategy. Concerns were also raised relating to the sustainability appraisal process.

### Responses received

Reference	Respondent
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council (ANBC)
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council (ANDBC)
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade & Commerce
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation (CEF)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (DfI)

Reference	Respondent
<a href="#">DPS-B-AZ-6</a>	George Best City Airport
<a href="#">DPS-A-1G-3</a>	Individual
<a href="#">DPS-A-XQ-M</a>	Individual
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited
<a href="#">DPS-B-8N-H</a>	Lisburn & Castlereagh City Council (LCCC)
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link (NIEL)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-1R-E</a>	Organisation
<a href="#">DPS-A-6R-K</a>	Organisation
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-B-U4-M</a>	Sustrans, Northern Ireland

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Support was expressed for the proposed growth strategy due to general alignment with the RDS objective to grow the City of Belfast and to help Belfast drive the regional economy.	Support for the proposed policy approach is welcomed, including the recognition of alignment with the RDS objective to grow Belfast as the driver of the regional economy.
<b>Growth too high</b>	
A number of respondents stated that the growth ambitions of the draft Plan Strategy are too high as it is	The growth aspirations represents the Council's commitment to population and jobs growth reflecting the ambition to capitalise on the role of Belfast as the driver of the regional economy. The level at which this is set is

Main Issue	Council Response
<p>unrealistic or unsustainable when read in the context of current house build rates.</p>	<p>based on robust evidence provided in the Housing Growth Options report.</p> <p>As set out within Technical Supplement 2: Housing (TS02), the level of housing proposed is comparable with historic build rates recorded through the housing monitor, which has demonstrated the ability of the development industry to sustain a level of house building over and above the level required to achieve the Plan Strategy's allocation during the economic peaks of the mid-2000s. Whilst the current economy is still within a period of recovery and there is still short-term uncertainty associated with Brexit, the economic outlook for the plan period to 2035 is relatively positive and has been bolstered by the recent City Deal approval. It therefore remains realistic to assume that as the economy improves, the level of housing delivery will also step up in pace to meet increasing demand.</p>
<p>It was suggested that a broader range of public sector interventions are required to deliver the step-change in delivery that would be required to see the growth aspirations realised.</p>	<p>It is recognised that the growth aspirations are ambitious and that public sector intervention may be required to help deliver the step change required. As noted above, notwithstanding the unknown effect of Brexit, the economic forecast for the plan period is positive and the proposed housing growth is closely aligned to potential economic growth.</p> <p>The LDP is only one element in a complex dynamic and the Council are continuing to assess the likely market impact of the emerging housing policies alongside potential incentives and measures to stimulate the different residential sectors. To date this has involved primary market research prepared by Colliers International which acknowledges that "public sector intervention in the form of a market stimulus may be required" in the short term to support market adjustments to the new policy environment.<sup>1</sup></p> <p>The Belfast Region City Deal is designed to deliver a step change in our region's economic fortunes, help achieve a</p>

<sup>1</sup> See 'Report to Belfast City Council's Development Planning and Policy Unit to consider the impact of its proposed housing policies (as set out Belfast Local Development Plan Draft Plan Strategy) on the residential property market located within the planning area', April 2019, Colliers International

## Council response to key issues raised

Main Issue	Council Response
	<p>15 year programme of inclusive growth, an increase of £470m Gross Value Added and create up to 20,000 new and better jobs, accessible to people from all communities. Although these benefits will be shared across the wider metropolitan area, not to mention the wider regional economy, the City of Belfast will remain at the core.</p> <p>Alongside this, the Plan Strategy itself includes a range of broader policies that will help support growth, such as policies relating to density of development, tall buildings, affordable housing, housing mix, delivering inclusive economic growth, etc. Furthermore, the Council also continue to work with key partners around the delivery of various aspects of growth, such as city centre regeneration and mechanisms for the delivery of affordable housing.</p>
<p><b>Growth too low</b></p>	
<p>The higher housing figure of 37,000 units used within the Preferred Options Paper should be reinstated to provide greater flexibility in ensuring a 5-year supply of land for housing.</p>	<p>As noted above, the rate of proposed growth is ambitious and is set at an appropriate level in accordance with the robust evidence contained within the Housing Growth Options report. It is therefore not considered appropriate to increase the rate of growth beyond that stated.</p> <p>The current rate will provide sufficient flexibility over the plan period, particularly given that higher levels of growth will most likely occur in the later part of the plan period.</p> <p>On-going monitoring of housing supply and land availability will ensure that a 5 year supply of land will be maintained throughout the plan period, with reviews of policy and allocation to be reviewed if necessary.</p>
<p><b>Conflict with Regional Development Strategy (RDS)</b></p>	
<p>The growth strategy conflicts with regional planning aims and the Regional Development Strategy (RDS) as they exceed the stated Housing Growth Indicator (HGI) for the District.</p>	<p>DfI acknowledge within their response (DPS-B-U5-N) to the draft Plan Strategy that “the HGI is not a target to be achieved, or a cap on development”, but that it rather provides a starting point for considering the level of housing likely to be required to meet housing need. The background paper on the HGIs on the Department’s website confirms that the original methodology used to create 2008-based HGIs was set-aside to create 2012-based updated figures. In this regard, it is notable that</p>

Main Issue	Council Response
	<p>the HGIs are based on the extrapolation of recent trends, which do not take into account issues such as the impact of policy on the size of the future population. In this context, exceeding the HGI for the district therefore offers no conflict with the RDS and can be justified by robust evidence.</p> <p>The dPS's growth strategy embodies an essential correlation between economic performance and the growth ambition that we see as necessary to allow the city to sustain its redevelopment and regeneration in a sustainable way. The approach moves away from the more trend based analysis utilised within the HGIs to one which focuses on place making and place shaping to have a positive influence on many of the legacy challenges faced by the city. It is an outcome based approach in line with the principles of the Belfast Agenda that takes cognisance of the potential for policy to influence the continued sustainable regeneration of the city.</p> <p>The Housing Growth Options report uses a robust methodology to link population and housing growth to economic outcomes, providing a comparison to the HGIs as part of the process. The report itself notes that the HGIs are "an important reference point for the development of planning policy" but analysis indicates "an apparent risk that planning to accommodate population and household growth as projected under the official datasets may result in a changing population profile which will not support anticipated employment growth."</p> <p>Additional technical clarifications to the Housing Growth Options Report have been provided by Turley and Edge Analytics relating specifically to the economic implications of limiting housing growth to the proposed HGI levels. It concludes that "the HGI would provide a labour force capable of supporting 18,500 jobs in Belfast", rather than the 46,000 new jobs predicted, without requiring unrealistic changes to key trend assumptions</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>such as commuting, unemployment rates or double jobbing.<sup>2</sup></p> <p>The housing growth proposed in the draft Plan Strategy therefore instead reflects the level of housing required to support the predicted baseline employment growth.</p>
<p>Conflicts with regional policy as growth should be underpinned by the principle of achieving 'balanced regional growth', addressing the 'critical issue' of 'tackling regional imbalance' in terms of economic growth.</p>	<p>The draft Plan Strategy is fully aligned to the aims of the RDS, including the need for strong, sustainable growth to benefit all parts of Northern Ireland and to strengthen Belfast as the regional economic driver. The spatial outworking of these aims is articulated through the Spatial Framework Guidance (SFG), to which 5 relate to Belfast and its wider Metropolitan Area.</p> <p>The growth articulated through the Plan Strategy, in terms of both employment and housing growth, is in full accordance with this regional guidance. In fact, as outlined in Belfast City Council's Regional Growth Comparison<sup>3</sup>, the housing growth articulated through the emerging LDPs of the Councils across NI, shows that the Belfast Metropolitan Area equates to just over 38% of the total regional growth proposed. This is broadly aligned with the balance between the Belfast Metropolitan Area and the rest of NI contained within the 2016 HGIs (40%), but falls significantly short of the recommended growth split of 48% for the Belfast Metropolitan Area (BMA) in the RDS 2035.</p>
<p>Conflicts with regional policy due to a lack of recognition that Belfast is at the centre of a wider metropolitan area, with the proposed growth failing to identify the implications for other settlements within the neighbouring council districts. Housing Market Analysis should be based on existing Housing Market Areas.</p>	<p>This issue is addressed fully in the following section on cross-boundary implications within the BMA below.</p>

<sup>2</sup> See 'Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, p13

<sup>3</sup> Belfast Local Development Plan Submission Topic Paper – Regional Growth Comparison



Main Issue	Council Response
<p>Conflicts with regional policy because economic growth should be at key locations throughout the BMA, including Major Employment Locations identified within the in RDS based on a full Employment Land Review to assess impact in terms of the functional economic market area. This includes recognition of Sprucefield as a regional out-of-town shopping centre; and</p>	<p>The draft Plan Strategy does not preclude the provision of economic growth at key locations throughout the BMA, and is therefore in full accordance with the RDS. In relation to Belfast's district, the draft Plan Strategy identifies the Major Employment Location of the Belfast Harbour Area as a key location for economic growth within the spatial development strategy (Policy SD2).</p> <p>To help establish economic growth projections and employment space requirements, the Council commissioned the Ulster University's Economic Policy Centre to forecast future economic scenarios and associated employment space requirements before publishing the POP. Alongside this, a review of the existing employment land supply was carried out as part of the Urban Capacity Study, but will be supplemented by more detailed analysis in the form of a full Employment Land Review to inform land zonings and designations to be considered as part of the subsequent Local Policies Plan.</p> <p>Our approach to the establishment of a retail hierarchy within the district is set out within Policy RET1, focussing on Belfast City Centre as the regional capital in full accordance with the sequential approach set out in the SPPS. This makes no comment in relation to the role of Sprucefield as a regional out-of-town shopping centre, which is located outside Belfast City Council's boundary.</p>
<p>There is a lack of a joined up approach to regional planning issues, including housing growth and infrastructure provision, with problems cited particularly in relation to waste water/sewerage infrastructure capacity and the need to cope with the high volume and variety of traffic passing through Belfast without having an adverse impact on journey times and emissions.</p>	<p>This issue is addressed fully in the sections on Transport and Infrastructure below.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>A number of suggestions were made for how the issues above could be addressed to make the dPS sound, including:</p> <ul style="list-style-type: none"> <li>• Revising the evidence base to demonstrate how the projected growth in housing can achieve sustainable growth;</li> <li>• Align growth with the 2016 HGIs, taking the lower level of growth forward in a realistic manner; and</li> <li>• Help achieve regional balance by scaling back of development in Belfast.</li> </ul>	<p>As noted above, the rate of proposed growth is set at an appropriate level in accordance with the robust evidence contained within the Housing Growth Options report. It is therefore not considered appropriate to reduce the rate of growth in Belfast. It is notable that this research highlights the risk household growth in line with HGIs may not serve the population required to support anticipated economic growth. This is made more explicit within the additional Technical Clarifications to the Housing Growth Options Report have been provided by Turley relating specifically to the economic implications of limiting housing growth to the proposed HGI levels.<sup>4</sup></p> <p>As also noted above, there is therefore no need to scale back the draft Plan Strategy to help the regional balance, given that the housing growth proposed in Belfast, alongside the growth articulated by other Council's across NI through their emerging LDPs, is broadly aligned with the balance between the Belfast Metropolitan Area and the rest of NI contained within the 2016 HGIs.</p> <p>However, in the light of the comments received, the Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination.</p>
<p>It was suggested that effective joint-working should be established with neighbouring councils to ensure that LDPs do not conflict with each other and that potential areas of conflict are identified and resolved prior to a Development Plan Document being submitted to the Department to cause an Independent Examination.</p>	<p>Given that all local planning authorities are required to engage with their neighbouring authorities, the Council considered the most appropriate forum for joint working in the light of good practice and experience from other jurisdictions. A Metropolitan Area Spatial Working Group (MASWG) was therefore established by Belfast City Council to provide a forum for cross-boundary issues to be discussed along with the LDP development process and to identify where the potential for consensus in policy and designations could be possible. The MASWG membership was made up of both officers and politicians from the neighbouring councils, along with DfI and other statutory representatives. The terms of reference for the group were agreed collectively by the group and specifically reference the need for a joined up approach</p>

<sup>4</sup> See 'Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, pp5-13

Main Issue	Council Response
	<p>to address issues and agreements that are considered to cross administrative boundaries.</p> <p>The MASWG provides an opportunity to explore shared and mutual interests and its role will undoubtedly become more important as detailed plans are developed. It has offered an invaluable forum to share information and provide a platform to discuss mutual themes, including transport issues, strategic housing markets and housing growth, the environment and cross-boundary designations, retail and economic development</p> <p>Whilst this has helped in identifying areas of conflict / consensus, and indeed agreement, at an early stage, it is important to emphasise that it is not the function of the MASWG to resolve areas of dispute as the group has no authority to remedy these. This was clarified on a number of occasions as part of discussions at the MASWG where differing views arose. Minutes of the meeting on 3 December 2018 specifically acknowledge that “the reality is that consensus cannot always be achieved on all issues” despite the ethos of the group being to “seek consensus on key topic issues.” They conclude that it would ultimately be the “role of the [Planning Appeals Commission]” to determine the soundness of the plan as part of the public examination process in considering the evidence submitted with the plan and any representations.</p>
<b>Cross boundary implications – Belfast Housing Market Area</b>	
<p>Belfast’s three neighbouring district councils and DfI made comments in relation to the cross-boundary implications of the growth strategy on the Belfast Metropolitan Area / functional housing market area. Whilst ANBC acknowledge that further cross-boundary engagement can take place on zonings and designations as the Local Policies Plan is developed, other respondents suggest</p>	<p>As noted above, it is the role of the examination in public to resolve any areas of conflict, through consideration of the evidence submitted with the plan and any representations.</p> <p>The Council acknowledge in TS02 that discussions will continue with neighbouring authorities and NIHE regarding the wider “cross boundary implications arising from the effective housing market area” as well as highlighting the potential to explore the prospect with neighbouring councils of enabling “land in these jurisdictions to be used to accommodate some of Belfast’s population growth” (paragraph 4.18) should</p>

## Council response to key issues raised

Main Issue	Council Response
<p>that further engagement should take place so that potential areas of conflict are identified and resolved prior to submission of the Plan Strategy for independent examination.</p>	<p>there be a residual housing need once appropriate land is zoned within the Belfast district.</p> <p>This position was recognised and welcomed by ANBC as part of their consultation response, but such detailed discussions will not be possible until more detailed work commences on the Local Policies Plan. However, initial indications from neighbouring districts, as documented in their POP consultations, suggest a supply of land that exceeds likely planned housing growth in the Districts, particularly in ANBC and ANDBC, suggesting capacity to accommodate some of Belfast's growth in the wider metropolitan area. However, land in neighbouring Districts is predominantly undeveloped greenfield land and so would be sequentially less preferable than brownfield land within Belfast.</p>
<p>The evidence base fails to adequately assess the implications of Belfast's growth on other settlements in neighbouring areas in terms of both jobs growth and housing provision. This is particularly important for areas that have strong labour force relationships with Belfast;</p>	<p>At the time of publication of the Belfast LDP draft Plan Strategy, the Council completed analysis of the emerging growth projections across the region based on the information available through the POP's/draft Plan Strategies of other NI councils<sup>5</sup>. Whilst acknowledging that two of the neighbouring authorities, alongside Belfast, were suggesting housing growth in excess of the HGI, the overall balance regional balance remains aligned with that of the HGIs due to higher growth proposed outside of the Belfast metropolitan area in Derry and Strabane and Armagh, Banbridge and Craigavon area.</p> <p>As also noted above, there is therefore no need to scale back the draft Plan Strategy to help the regional balance, given that the housing growth proposed in Belfast, alongside the growth articulated by other Council's across NI through their emerging LDPs, is broadly aligned with the balance between the Belfast Metropolitan Area and the rest of NI contained within the 2016 HGIs.</p> <p>In addition, the Housing Growth Options report specifically analyses and assesses the implications of</p>

<sup>5</sup> Please note at the time, ANDBC were yet to publish their Preferred Options Paper and had not supplied any information in relation to their housing growth. For estimation, the proposed HGI for that District was therefore utilised. This position has since been confirmed following publication of the ANDBC POP.

Main Issue	Council Response
	<p>Belfast's growth on settlements in neighbouring areas though consideration of labour force relationships, migration flows and commuting ratios between Belfast and other council areas, as part of the development of growth scenarios. It concludes that a continuation of past trends in terms of labour force behaviour would not support forecast economic growth within Belfast and that reasonable and conservative assumptions on future changes in labour force behaviour would ensure delivery of the preferred growth scenario.</p> <p>This is made more explicit within the additional Technical Clarifications that have been provided by Turley relating specifically to the migration flows associated with the recommended growth scenarios.<sup>6</sup> This illustrates how inward migration from the rest of the UK and the rest of the world, rather than from within NI, can ensure that "Belfast could achieve and maintain the net inflow [of residents] required to grow...without affecting the established trend of that has seen other districts continue to receive a net inflow from Belfast over recent years."</p> <p>As noted above, in the light of the comments received, the Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination.</p>
<p>Neighbouring councils' plans or strategies do not appear to have been clearly cross-referenced in the development of the draft Plan Strategy, meaning the cumulative effects of the housing growth proposed by the other Councils within the BMA haven't been fully assessed. DfI suggest that the collective growth of Councils within the BMA exceeds the combined HGI.</p>	<p>The existing policy context, which affects both Belfast's district and neighbouring districts, formed one of the first stages of the process of developing the Belfast LDP. This is summarised within chapter 3 of the draft Plan Strategy, as well as being outlined in greater detail in relation to specific topics within the suite of Technical Supplements.</p> <p>At the time of publication of the Belfast LDP draft Plan Strategy, the Council completed analysis of the emerging housing growth projections across the region to ensure cumulative effects were understood. Based on information available from emerging LDPs within the districts in the Belfast metropolitan area, the total proportion of proposed housing growth within BMA is</p>

<sup>6</sup> See 'Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, pp14-20

## Council response to key issues raised

Main Issue	Council Response
	<p>broadly comparable with the proportion contained within the 2015 HGIs. This ensures that the growth proposed would not adversely affect the general balance between the Belfast Metropolitan Area and rest of NI.</p>
<p>Although the Council has engaged through the MASWG, there is little evidence that this has influenced the housing growth set out in the draft Plan Strategy.</p>	<p>The MASWG has provided an invaluable opportunity to share information, explore issues and discuss areas mutual interest throughout the development of the draft Plan Strategy. The minutes of the meetings, agreed at the beginning of each subsequent meeting, provide adequate evidence of the issues raised and key actions taken as a result.</p> <p>It should be recognised that the focus for the group when first established was on the development of the Plan Strategy for Belfast and the ability of the surrounding authorities to engage and indeed articulate their defined positions was dependent on the stages they had reached in their own evidenced policy or plan development. For example, at the MASWG meeting on 1<sup>st</sup> November 2017, Belfast City Council officers provided an overview of the current Belfast position on housing issues, including population and housing growth, the initial findings of the urban capacity study and potential implications for neighbouring areas. At this same meeting, Dfl confirmed “that evidence suggests ability to build beyond HGIs” as they acknowledged the divergence in approach.</p> <p>At the subsequent meeting on 26<sup>th</sup> January 2018, LCCC reported that they were also seeking to appoint independent consultants to consider their approach to housing growth, the results of which have not yet been made available to Belfast City Council. Furthermore, at this meeting, Dfl also confirmed that the HGI methodology may need to be more flexible in taking into account the housing backlog that has built up over recent years.</p> <p>As noted above, whilst the MASWG has from the outset provided a useful forum for meaningful engagement helping to identify areas of cooperation, concern and consensus, it is important to emphasise that it is not the function of the MASWG to resolve areas of dispute as the</p>

Main Issue	Council Response
	<p>group has no authority to remedy these. Where necessary, that is the function of the examination in public.</p> <p>Alongside this, formal responses were also submitted by two of the neighbouring Councils as part of the POP consultation, with the outcomes and Council's responses summarised in the POP Public Consultation Report (July 2017). Belfast City Council have also provided both formal and informal written responses to neighbouring Councils in response to their POP consultations and emerging policy approaches, which highlight implications for Belfast and how alignment with Belfast's emerging plan can be achieved. The role of the MASWG will undoubtedly continue to evolve as the LDP as a project moves through the stages of the plan development. The scope for areas of mutual cooperation or agreed change will shift as the emphasis moves to the Local Policies Plan processes. This was widely accepted by the constituent partners at the most recent meeting on 11<sup>th</sup> March 2019, where it was suggested the terms of reference for the group could evolve as the LDP process progresses.</p>
<p>Little consideration has been given to the wider Metropolitan Housing Market Area, which is regarded as important to promote strategic partnership working. The RDS advises that Councils' will need to work closely together when making strategic planning decisions around the level of housing growth and the infrastructure required in support of that growth.</p>	<p>Clearly, a sound understanding of the functional housing market area is important when developing housing policies for a specific District within. The SPPS states that the NIHE will carry out the Housing Market Analysis required to inform the LDP. The Housing Market Analysis Update (September 2017) was therefore prepared by NIHE specifically to "inform Local Development Plans (LDP) housing policies..." In addition to the update provided in 2017, the Council have also had regard to the original 'Belfast Metropolitan Housing Market Area: A Local Housing System Analysis' (NIHE, 2011).</p> <p>Additional technical clarifications to the Housing Growth Options Report have been provided by Turley and Edge Analytics relating specifically to understanding the implications of housing market areas. It notes that whilst local authorities may need to demonstrate 'an understanding' of their housing market area geography, it is nevertheless necessary at some point to focus on the</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>District given that the SPPS is clear that a Plan Strategy must be prepared for specific the Council area.<sup>7</sup></p> <p>Within the 2017 update report, NIHE note that the analysis relates to the Belfast Council area and acknowledged that the housing market area boundaries were under review, with revisions to be published in 2018. However, the new Housing Market Areas were only published in August 2018, so weren't available at the time the Plan Strategy was developed. The implications of any up to date housing market analysis for the wider Belfast metropolitan housing market area will be considered when available.</p> <p>The Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination. Any subsequent updates to market analysis taking account of actual delivery as part of the plan period will also be considered as part of the Council's routine monitoring once the Plan Strategy is adopted.</p>
<p>It is not evidenced how the projected growth can be facilitated in terms of infrastructure provision and what the infrastructure impact may be for neighbouring Council districts.</p>	<p>This issue is addressed fully in the section on Infrastructure below.</p>
<p>There is insufficient evidence to demonstrate that the planned growth, in combination with neighbouring councils can be supported by the transport network. It is noted that it is not possible or feasible to detach a transport plan for Belfast from the wider BMA and so should be completed collectively.</p>	<p>This issue is addressed more fully in the section on Transport below.</p>

<sup>7</sup> See 'Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, pp21-23



Main Issue	Council Response
<p>A number of suggestions were made for how these issues could be remedied, including:</p> <ul style="list-style-type: none"> <li>• Provision of further evidence on the impacts of growth on neighbouring Councils, suggesting the growth should achieve a neutral impact;</li> <li>• Evidence to demonstrate that the population growth predictions have been discussed with neighbouring councils to secure agreement of collective growth figures, in terms of employment and housing targets for the BMA, which can be realistically facilitated by infrastructure partners; and</li> <li>• Joint working by the councils in the BMA and Dfl towards agreed infrastructure and transport strategies.</li> </ul>	<p>There is no requirement for a LDP to have 'neutral' impact on adjoining areas, but rather that the plan has 'regard' to the plans, policies and strategies within adjoining council areas. The minutes of the meetings of the MASWG provide robust evidence of the engagement between Councils and summarise the key issues discussed, including any consensus, potential for cooperation and concerns raised by neighbouring authorities that the Belfast LDP should have regard to. As noted above, this included a presentation and discussion on Belfast LDP's evidence base and emerging 'housing issues' on 1 November 2017, as well as extensive discussions around the implications of differing methodologies for housing growth recorded at the meeting on 26 January 2018. This same meeting in January 2018 also involved a focussed discussion on employment land and the economy, including the emerging evidence base within each District, whilst transport issues were raised in every MASWG that has taken place.</p> <p>As noted above, whilst the MASWG has an important role around information sharing, cooperation and discussing mutual areas of interest, it is not the function of the group to resolve areas of dispute or where areas of disagreement occur as the group has no authority to remedy these. That is the function of the examination in public.</p> <p>The Regional Strategic Transport Network (RSTN) Transport Plan is part of a new suite of transport plans being prepared by the Department for Infrastructure. The plans will set out the new transport infrastructure proposed for delivery to year 2035 in line with the Programme for Government outcomes and regional objectives. Until they are complete, the Council will continue to have regard to the existing Belfast Metropolitan Transport Strategy and regional plans and policies, as well as the findings of the BMTP Interim Review undertaken in 2016. Similarly, Dfl would be the appropriate authority to produce a BMA Infrastructure Plan. However the Council is undertaking an Infrastructure Study that is intended to ensure</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>infrastructure providers are planning for the correct level of future development including the growth ambitions of the emerging LDP.</p> <p>It is important to recognise that our that the latest housing monitor (2018/19) identifies land for over 22,000 units, whilst our 2015 baseline assessment of housing land<sup>8</sup> suggested closer to 26,000 units, much of which already has planning approval. Similarly our employment baseline assessment<sup>9</sup> indicates that we have somewhere in the region of 608,000sq m of committed office and employment space. These have come through the planning process, involving an assessment of wider infrastructure needs in consultation with the relevant statutory authorities.</p> <p>It should also be noted that the specific transport and infrastructure implications of individual developments will continue to be assessed through consultation with the relevant statutory partners at the planning application stage. It is recognised that this will need to take into account and appropriately mitigate any negative implications, such as cross boundary impacts of the development on the wider BMA.</p>
<p><b>Cross-boundary implications – Employment land</b></p>	
<p>The cross-boundary implications of employment growth were queried, with questions raised around how economic success would be defined.</p>	<p>The Council appointed Ulster University’s Economic Policy Centre to develop economic growth projections and assess employment space requirements across the City. The same consultants advise not only BCC but also the NI Assembly on growth projections and employment needs for the wider region. The methodology followed therefore reflects wider growth implications across the region, whilst highlighting the specific requirements for the Belfast district.</p> <p>The proposed growth builds upon the baseline economic forecasts, the outcome of which are detailed within the UU report<sup>10</sup>. Within the Belfast Agenda, long-term success is articulated as the Belfast economy supporting</p>

<sup>8</sup> Appendix D2 – 2015 Housing Baseline

<sup>9</sup> Appendix D1 – 2015 Employment Baseline

<sup>10</sup> Assessing Employment Space Requirements across the City 2015-2030, UU Economic Policy Centre

Main Issue	Council Response
	46,000 additional jobs by 2035. This ambition is carried forward within the LDP as part of Policy SP1.
<p>There is a need to assess employment land supply across the wider BMA, noting a number of major employment locations identified within the RDS. The regional role of Sprucefield and its implications for Belfast's retail strategy was also referenced.</p>	<p>This issue is addressed fully in the section on the Conflict with the Regional Development Strategy (RDS) above.</p>
<b>Transport</b>	
<p>There is a need for integration between transportation and land-use planning. Although it is noted that the transport elements broadly align with the strategic direction of the draft Programme for Government, the RDS and the current regional approach to transportation, it is suggested that the Council have provided insufficient evidence to show how the transport network has been considered as a facilitator for growth. Similarly, it is suggested that the transport implications across BMA cannot be assessed in the absence of an up to date Transport Plan, although it is acknowledged that the evidence base refers to the current local transport plan, the Belfast Metropolitan Transport Plan (BMTP).</p>	<p>The SPPS places an importance on the interrelationship between the location of local housing, jobs, facilities and services and infrastructure. Belfast's continued success at creating new employment opportunities has exacerbated transport problems associated with housing being provided outside of Belfast. This has created patterns of long commutes and stress on transport infrastructure.</p> <p>The policies contained in the Transportation section of the Plan Strategy outline an approach to deliver sustainable patterns of development which reduce the need to travel and policies which clearly prioritise active travel and travel by public transport. As noted by DfI, this approach aligns with the direction of travel set out in the PfG, RDS and current approach to regional transportation.</p> <p>We believe that it is more sustainable in terms of reducing the need to travel and encouraging walking and cycling to locate new homes within Belfast's district rather than in more peripheral locations of neighbouring districts. In the latter case, this is likely to lead to more trips into Belfast via private car, which Belfast's existing road network is unable to accommodate. There is evidence within SA/SEA process of how transport implications in a general sense have been taken on board in assessing the sustainability of our preferred approach.</p> <p>The BMTP 2004 will continue to be the extant transport plan until such times as its replacement is adopted.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Furthermore, the Interim Belfast City Centre Transport Framework review undertaken in 2016 was in part an attempt to plan for the impact of major new development in the city centre that was either currently under construction or already had planning permission.</p> <p>As above, it should also be noted that our latest housing monitor (2018/19) and baseline assessment<sup>11</sup> identifies land for over 22,000 homes and c.608,000sq m of committed office and employment space respectively which have come through the planning process, following an assessment of wider transport needs in consultation with the relevant statutory authorities. It must therefore be accepted as a starting point that the existing transport networks should be able to accommodate such growth, given that valid consents can in many cases be implemented without further planning approval.</p>
<p>There is a need for less reliance on the private car and a need for affordable alternatives, such as a high-speed, efficient public transport system.</p>	<p>This acknowledgement is welcomed. The draft Plan Strategy seeks to establish a policy framework to facilitate these transport outcomes.</p>
<p><b>Infrastructure</b></p>	
<p>There is a lack of evidence as to how infrastructure requirements will be met. This referred primarily to waste water and sewerage infrastructure, although infrastructure generally was referenced in more general terms, as was community infrastructure (health, education, etc.). The need for a co-ordinated approach to infrastructure delivery in partnership with service providers and neighbouring councils was noted, given the</p>	<p>The SPPS notes the need to manage growth in a sustainable way, placing particular emphasis on the importance of the inter-relationship between the location of local housing, jobs and infrastructure. DfI are the statutory authority responsible for regional infrastructure provision and would therefore be the appropriate authority to produce a BMA Infrastructure Plan.</p> <p>The council are currently completing a Belfast Infrastructure Study, which will help identify where investment is needed and the associated risks, which can be addressed at the LPP stage. For clarity the LPP will need to address infrastructure requirements in a supplement to the Delivery chapter of the draft Plan Strategy. This work could also be refined to formally address mitigation measures outlined in the SA in relation</p>

<sup>11</sup> Appendix D1 – 2015 Employment Baseline

Main Issue	Council Response
<p>cross-boundary nature of most infrastructure networks.</p>	<p>to infrastructure constraints and initiatives such as Sustainable Urban Drainages Systems (SuDS).</p> <p>In relation to wider community infrastructure requirements, such as open space, health, education or community facilities, the LDP contains a number of policies to facilitate delivery, such as Policy CI1: Community infrastructure or Policy GB1: Green and blue infrastructure network.</p> <p>In terms of the ability for the likely infrastructure implications associated with potential new zonings, detailed Housing Monitor information is available in addition to the sites identified as part of the published Urban Capacity Study. The latest housing monitor (2018/19) identifies land for over 22,000 units, a significant proportion of which already have extant planning approval or have been previously zoned for housing through the BMAP processes. Similarly, our baseline assessment of employment land<sup>12</sup> identifies c.608,000 sq m of committed office and employment space which has come through the planning process, following an assessment of wider infrastructure needs in consultation with the relevant statutory authorities. The transport and infrastructure authorities, as a statutory consultee in the development management and previous plan development processes, recognised that the existing transport and other networks would need to be able to accommodate such growth.</p>
<p><b>Phasing</b></p>	
<p>Additional detail is required in relation to the potential need to phase development to align with infrastructure provision. In one case, it was suggested that phasing could be inflexible and that references to phasing should be removed from the final Plan Strategy.</p>	<p>The SPPS notes the need to manage growth in a sustainable way, placing particular emphasis on the importance of the inter-relationship between the location of local housing, jobs and infrastructure. Where infrastructure constraints are identified, there may therefore be a need to phase the delivery of housing or employment space to align with infrastructure investment. This will be considered in more detail as part of the Local Policies Plan, informed by the pending Belfast Infrastructure Study.</p>

<sup>12</sup> Appendix D1 – 2015 Employment Baseline

## Council response to key issues raised

Main Issue	Council Response
	<p>However, as noted above that the latest housing monitor identifies land for over 22,000 units, much of which already has planning approval. Similarly our baseline assessment<sup>13</sup> indicates that we have somewhere in the region of 608,000sq m of committed office and employment space. These have come through the planning process, involving an assessment of wider infrastructure needs in consultation with the relevant statutory authorities. Many such committed sites cannot therefore be subject to phasing, given that valid consents can in many cases be implemented without a further planning application.</p>
<h3>Zoning</h3>	
<p>Suggestion that the zoning of land that is already available for development will not deliver the growth aspirations due to lack of flexibility. It is also unclear how the allocation of land for housing will correlate with areas of housing need.</p>	<p>The zoning of land for housing is a statutory requirement and one which will ensure a planned approach to future housing delivery, which is appropriate to ensure infrastructure and services can also be planned alongside.</p> <p>In addition to the comments made above in relation to phasing, the zoning of land and how it correlates with areas of housing need, will be considered in detail as part of the Local Policies Plan.</p>
<h3>Evidence base</h3>	
<p>The soundness of the evidence base was questioned, including a critique of the methodology followed within the Housing Growth Options Report and discrepancies between it and the population associated with Ulster University's forecasting model.</p>	<p>The Housing Growth Options report, produced by Turley and Edge Analytics, uses a robust methodology to link population and housing growth to economic outcomes. The Housing Growth Report notes the discrepancies referenced in these comments and explains that they likely to relate to assumptions around future economic participation and/or changes in commuting levels, rather than migration rates.</p> <p>This confirmed within the additional Technical Clarifications that have been provided by Turley and Edge Analytics, which illustrates how inward migration from the rest of the UK and the rest of the world, rather than from within NI, can ensure that "Belfast could achieve and maintain the net inflow [of residents] required to grow...without affecting the established trend of that has</p>

<sup>13</sup> Appendix D1 – 2015 Employment Baseline

Main Issue	Council Response
	<p>seen other districts continue to receive a net inflow from Belfast over recent years.”<sup>14</sup> It also confirms that holding housing growth to HGI levels would result in unsustainable changes in commuting and unrealistic changes in economic activity within the labour force to achieve the baseline growth predicted by Ulster University (UU) Economic Policy Centre (EPC).</p> <p>It should be noted that UUEPC were commissioned to assess employment space requirements across the City, whilst Turley and Edge Analytics were commissioned specifically to develop a range of population and housing growth scenarios. As such, the population projections derived from the UU models are considered less reliable than the models produced by Edge Analytics specifically to look at population and housing implications.</p>
<p>It was suggested that the evidence base should include an analysis of market sectors and locations for housing growth, as well as a review of the market reality of achieving a notable uplift in the supply of housing, particularly evidence that wider public sector support exists for the scale of potential pipeline in the city centre to be achieved.</p>	<p>As noted above, the Belfast Region City Deal is designed to deliver a step change in our region’s economic fortunes, help achieve a 15 year programme of inclusive growth, an increase of £470m Gross Value Added and create up to 20,000 new and better jobs, accessible to people from all communities. Although these benefits will be shared across the wider metropolitan area, not to mention the wider regional economy, the City of Belfast will remain at the core. It is realistic to assume that such an intervention will have a significant impact on the broader economy and that a notable uplift in the level of housing delivery will occur to ensure that supply continues to meet increasing demand.</p> <p>As set out within TS02, the level of housing proposed is comparable with historic build rates recorded through the housing monitor, which has demonstrated the ability of the development industry to sustain a level of house building over and above the level required to achieve the Plan Strategy’s allocation during the economic peaks of the mid-2000s. The Council are continuing to assess the likely market impact of emerging housing policies through primary market research with the development industry and partnership with other stakeholders to</p>

<sup>14</sup> See ‘Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, pp17

## Council response to key issues raised

Main Issue	Council Response
	<p>encourage developments that deliver the ambitions for the city. This will supplement work previously undertaken by Three Dragons and referenced within the Housing Technical Supplement.</p> <p>As part of this, research completed by Colliers International notes that despite some geographical sensitivities, “there is no overriding impediment to the draft policies set out in the dPS contributing to the supply of affordable housing in Belfast.”<sup>15</sup> Additional research will also be undertaken as required to inform both the zoning of land through the LPP and proposed SPG on key policies such as affordable housing.</p>
<p>It was suggested that the evidence base should include an assessment of the cumulative impacts of housing growth alongside that proposed by the other Councils within the BMA.</p>	<p>This issue is addressed fully in the following section on cross-boundary implications within the BMA above.</p>
<p>There is a need for evidence building upon the Urban Capacity Study to substantiate that the required rates of housing delivery can be delivered.</p>	<p>As set out within TS02, the level of housing proposed is comparable with historic build rates recorded through the housing monitor, which has demonstrated the ability of the development industry to sustain a level of house building over and above the level required to achieve the Plan Strategy’s allocation during the economic peaks of the mid-2000s. Whilst the current economy is still within a period of recovery and there is still short-term uncertainty associated with Brexit, the economic outlook for the plan period to 2035 is relatively positive and has been bolstered by the recent City Deal approval. It therefore remains realistic to assume that as the economy improves, the level of housing delivery will also step up in pace to meet increasing demand.</p> <p>The high-level findings of the Urban Capacity Study will be supplemented by more detailed site-specific analysis to help inform the zoning of land in the subsequent LPP. As outlined in Appendix F of the draft Plan Strategy, the</p>

<sup>15</sup> See ‘Report to Belfast City Council’s Development Planning and Policy Unit to consider the impact of its proposed housing policies (as set out Belfast Local Development Plan Draft Plan Strategy) on the residential property market located within the planning area’, April 2019, Colliers International



Main Issue	Council Response
	<p>on-going housing land availability monitor will also provide an annual assessment of the delivery of housing growth during the plan period and the statutory 5 yearly review will offer an opportunity for any appropriate adjustments to be made if required.</p>
<p>Evidence is required to demonstrate that the infrastructure required to facilitate the proposed level of growth is realistic and affordable to all infrastructure partners.</p>	<p>This issue is addressed more fully in the section on Infrastructure above.</p> <p>However, the council are currently completing a Belfast Infrastructure Study, which will help identify where investment is needed and the associated risks, which can be addressed as the LPP stage. This will help inform DfI, as the statutory authority responsible for regional infrastructure provision, in the discharge of their duty. The Local Policies Plan will take the findings of the Study into account will address infrastructure requirements in a supplement to the Delivery chapter of the draft Plan Strategy.</p>
<p>Evidence should quantify the transport network capacity and future transport infrastructure improvements required to facilitate anticipated growth in both housing and jobs. This should include an assessment of the practicality and impacts of such improvements and the likelihood of funding becoming available.</p>	<p>This issue is addressed more fully in the section on transport above.</p> <p>As noted above, the existing quantum of development that comprises the already approved or baseline position (through consents or previous development plan processes) – over 22,000 homes and c.608,000sq m of committed office and employment space – must be accepted as a starting point for existing transport networks to accommodate, given that valid consents can in many cases be implemented without further planning approval. This covers the period that extends well beyond the first formal plan reviews that will be informed by a new monitoring approach.</p> <p>The conclusion of the LDP process through completion of the detailed Local Policies Plan will only be achieved through the quantification of implications for infrastructure and transport for inclusion, where appropriate, within the plan to ensure the maintenance of an effective land supply and viable sites.</p>
<p>A full Employment Land Review is required and an</p>	<p>A high level review of the existing employment land supply was carried out as part of the Urban Capacity</p>

## Council response to key issues raised

Main Issue	Council Response
<p>assessment of likely demand for employment floorspace or the level that the market would be willing to bring forward.</p>	<p>Study, but will be supplemented by more detailed analysis in the form a full Employment Land Review to inform land zonings and designations to be considered as part of the subsequent Local Policies Plan.</p> <p>Ulster University (UU) Economic Policy Centre were commissioned to assess employment space requirements across the City, resulting in the employment floor space requirements set out in the draft Plan Strategy.</p>
<p>It was suggested that the evidence base should include an assessment of the social and environmental infrastructure required to satisfy the growth strategy, where and how it can be provided and how it will be funded.</p>	<p>The local social and environmental infrastructure context is summarised within the suite of Technical Supplements published alongside the Plan Strategy. In addition, a Belfast Open Space Strategy (BOSS) is being prepared alongside the LDP, which includes an open space audit that has informed the plan preparation. This was published for public consultation on 17 June 2019, alongside the Belfast Green and Blue Infrastructure Plan (GBIP), before being finalised later in the year.</p> <p>In relation to other social infrastructure, such as health and education, the statutory responsibility for providing such services lies with external agencies. Both the Education Authority and the Belfast Health Trust have been consulted as part of the plan preparation process. Both bodies will ensure that adequate provision is made in line with future growth.</p> <p>The draft Plan Strategy includes a number of facilitative policies to enable the provision of such social and environmental infrastructure that arises during the plan period. Any specific land use requirements arising in relation to social and environmental infrastructure will also be addressed where known as part of the subsequent Local Policies Plan.</p>

Main Issue	Council Response
<b>Miscellaneous issues</b>	
<p><b>Type of jobs</b></p> <p>There is a need for access for local communities to new employment opportunities and for interventions to deliver benefits for existing residential areas.</p>	<p>Who gains employment as a result of new jobs created is outside the remit of the Plan.</p>
<p><b>Existing communities</b></p> <p>It was suggested that comments made in response to the Preferred Options Paper consultation in relation to the compliance with the RDS had not been fully taken into account within the draft Plan Strategy.</p>	<p>Comments raised as part of the POP consultation were analysed and helped inform the development of the draft Plan Strategy. A full copy of the POP Public Consultation Report is available on the Council's website at: <a href="http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport">http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport</a>. This includes a summary of all the comments received and the Council's responses to them.</p>
<b>Sustainability appraisal</b>	
<p>Concerns were raised in relation to the sustainability appraisal process, with suggested omissions including:</p> <ul style="list-style-type: none"> <li>• Reference to neighbouring Councils' plans and strategies;</li> <li>• The lack of full consideration of transport implications; and</li> <li>• That baseline demographic growth should be represented as a positive outcome.</li> </ul>	<p>Detailed response included within summary of SA responses.</p>

### Policy SP2 – Sustainable development

#### Summary of Responses

Fourteen respondents provided comments in relation to policy SP2. Of the comments submitted:

- Supporting comments for Policy SP2;
- Evidence base should include predicative and adaptable planning papers on new emerging technologies.
- The demand for the number of homes and the timing and rate of site releases with potential impact on infrastructure capacity.
- Historic Environment should be used as a descriptive wording.
- Improve clarity and definition of Brownfield development
- Ordering of the Strategic Policies.
- The demonstrable harms test and precautionary principle.
- Evidence base for assessing Transportation needs to accommodate Development Growth
- Policy is too prescriptive

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure's (DfI) Water and Drainage Policy Division (WDPD)
<a href="#">DPS-B-UF-6</a>	Ashton Centre
<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited

Reference	Respondent
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-99-W</a>	Historic Monuments Council
<a href="#">DPS-A-Q3-F</a>	Ireland Brownfield Network
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-A5-1</a>	The National Trust NI
<a href="#">DPS-A-6X-S</a>	Translink
<a href="#">DPS-A-6U-P</a>	Organisation

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Predicative and adaptable planning papers should be considered in the plan. Not considered driverless technology.	The UK government is currently researching emerging transport technologies and business mobility models to enable the development of principles that will guide government's response to maximise the benefits from transport innovation in

Main Issue	Council Response
	urban areas. The LDP has recognised the potential expansion of electric vehicles in the Technical Supplement 13 Renewable Energy and provision for future technology has been made in Policy TRAN 8 – Car parking and servicing arrangements to accommodate electric vehicles.
No evidence about the timing and rate of site releases, and the demand for, and number of homes. Provide evidence to justify the release of land to deliver the social and economic priorities.	Most of our site are brownfield and will in many ways respond to market conditions as opposed to large greenfield development where phasing is more straight forward to manage. Housing will be delivered in accordance with the requirements set out in Policy HOU1 – Accommodating new homes, (page 61). Figure 7.2: Delivery of housing supply on page 62 illustrates how the housing supply within policy HOU1 can be delivered over the plan period, in accordance with the indicative annual rates of delivery. The supporting evidence is supplied in Technical Supplement 2 and Housing studies that were publicly available alongside the draft Plan Strategy during the public consultation exercise in 2018.
Concerned about capacity and funding issues to be able to accommodate proposed population growth.	Housing population growth will be delivered in accordance with the requirements set out in Policy HOU1 – Accommodating new homes, (page 61). Figure 7.2: Delivery of housing supply on page 62 illustrates how the housing supply within policy HOU1 can be delivered over the plan period, in accordance with the indicative annual rates of delivery. In para 7.1.9, page 61, states <i>If necessary, land may be phased to ensure alignment of housing delivery with planned infrastructure investment and development lead-times.</i>
Role of the historic and natural environment recognised in creating sustainable development. The term historic environment should be included in the definition to make the policy sounder.	See minor modifications.
The Policy is undermined by statements within the LDP document concerning the reuse of	The definition of brownfield sites is the accepted definition as set out in the RDS.

## Council response to key issues raised

Main Issue	Council Response
brownfield sites. Amend definition of brownfield sites.	
Should be the first policy in the LDP. Focusing on growth places it above other strategic matters. SP2 listed as the first overarching policy guiding all development decisions.	There would be no significant change in status achieved from renumbering the Strategic Policies. All of the strategic policies (SP) are overarching policies that have to be considered at the outset of any proposed development.
<p>Policy wording has failed to comply with the demonstrable harms test and precautionary principle. Amend to replicate SPPS Paragraph 5.72. Also the exact wording of SPPS Paragraph 3.9 is included.</p> <p>Amend, where there is demonstrable harm to interests of importance, permission will be refused.</p>	This is an overarching strategic policy which must be read in conjunction with the other policies in the draft plan strategy, in particular Policy NH1 – Protection of natural heritage resources (page 255) will adopt the precautionary principle. Policy SP2 (page 36) Para 5.2.3 addresses the issue of demonstrable harm caused by development proposals that are in conflict with the LDP. Therefore the dPS fully complies with RDS and SPPS requirements concerning sustainable development.
<p>Lack of transport plan to inform the sustainability of land supply. Fails to note the POP comments. Requires a robust evidence base and a transport study, to assess the traffic impacts of the LDP.</p>	<p>This is an overarching strategic policy which must be read in conjunction with the other policies in the draft plan strategy, in particular Policy SP7 Connectivity (page 41) and The Transport policies contained in section 9.4 (205) comprising Policy TRAN 1 – Active travel – walking and cycling, Policy TRAN 3 – Transport assessment, Policy TRAN 4 – Travel plan, Policy TRAN 5 – New transport schemes.</p> <p>The draft Plan Strategy was developed on the basis that the BMTP 2004 will continue to be the extant plan, alongside other strategic Transport Statements, until such times as the said replacement is adopted. This approach reflected that for the adoption of BMAP in 2014 – which was progressed some 10 years after the transport plan. This was not to suggest there was no review of the context in terms of the transport interventions and proposals which were brought forward after the publication of the BMTP. It should be recognised that the Interim Belfast City Centre Transport Framework review undertaken in 2016 was carried out to consider the implications of significant new development, predominantly in the city centre, which was either</p>

Main Issue	Council Response
	<p>currently under construction or already had planning permission. This point is particularly pertinent as through that process the volume of planning approvals which had gone through the process were highlighted, in terms of the extent of development considered in the context of all material considerations at that time. As part of the decision making governance structures the transport and water and other infrastructure agencies were content with the scale and location of developments proposed. Whilst the growth aspirations for Belfast undoubtedly appear ambitious they need to be considered against the backdrop and scale of permissions already granted, as a baseline position for the city, with direct and assessed implications or requirements for infrastructure already recognised by the relevant statutory authorities. Under the new two tier LDP process, the proposal has always been to carry out more detailed analysis of transport impacts associated with specific sites at the Local Policies Plan Stage.</p>
<p>Prescriptive in keeping the pillars lined up is prejudicial to the plan objectives.</p>	<p>Policy SP2 sustainable development is a strategic policy adopting the requirement of the RDS and SPPS to ensure a balanced development approach that is protective of all three pillars for building resilience for current citizens, biodiversity, and for future generations.</p>

### Policy SP3 – Improving health and wellbeing

#### Summary of Responses

**Nine** respondents provided comments in relation to **Policy SP3**. Of the comments submitted:

- One respondent, while supporting the policy, stresses the need for ongoing consultation and engagement;
- Two respondents consider it is important that health is considered as part of the planning process and that health impacts are considered in decision-making to help achieve the Belfast Agenda aims;
- One respondent suggests that the policy is unclear and questions what the tests are to enable compliance and how this will be monitored. Also unclear if **SP3** is intended to provide support for **CI1** policy;
- One respondent requires further discussion to ensure policies benefit citizens and neighbourhoods;
- One respondent finds the draft Strategic Policy is not robust and is contrary to RDS and SPPS;
- One respondent stated that the policy should state strong presumption against greenfield/urban fringe development;
- One respondent stated that the council should adopt its cohousing model, which supports social cohesion and wellbeing, and should allocate sites for cohousing;
- One respondent stated that the policy has broad objectives rather than policies.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-A-6U-P</a>	Organisation (DPS-A-6U-P)
<a href="#">DPS-A-QS-F</a>	Cohousing NI
<a href="#">DPS-B-8N-H</a>	Lisburn and Castlereagh City Council
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-A-Q2-E</a>	LATT Ltd
<a href="#">DPS-A-QT-G</a>	Sandy Row Community Forum
<a href="#">DPS-A-6R-K</a>	Organisation

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Unclear what the tests are to enable compliance and how this will be monitored.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies. <b>HC1 and CI1</b> in particular provide the



Main Issue	Council Response
The policy overlaps with <b>CI1</b> and it is unclear if <b>SP3</b> is intended to provide support for that policy.	operational policies in the delivery of healthy communities and community infrastructure for development management. Future SPG and KSR will provide further guidance on this matter.
The policy requires further discussion to ensure policies benefit citizens & neighbourhoods.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies. HC1 and CI1 in particular provide the operational policies in the delivery of healthy communities and community infrastructure for development management. Future SPG and KSR will provide further guidance on this matter this will be shaped through further engagement. The development management process facilitates engagement with local residents who may be impacted by proposed developments.
Policy not robust and is contrary to RDS and SPPS.	BCC does not agree with this issue. Both the RDS and SPPS recognise the importance of improving health and wellbeing and the role planning plays in this. Therefore the dPS fully complies with RDS and SPPS. These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies.
Policy has broad objectives rather than policies.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies.
The policy should state strong presumption against greenfield/urban fringe development	<b>SP3</b> is one of a number of overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies. The LDP prioritises brownfield development and this forms part of the overall development strategy. The plan should be read in its entirety and it is not necessary to repeat or duplicate other policy provisions.
The policy should support cohousing development.	The dPS supports the provision of a range of house types and tenure mixes across the city to meet local needs, including through any proposals based on the co-housing model. BCC considers that it is not necessary to make any reference to specific types of housing models throughout the dPS.

### Policy SP4 – Community cohesion and good relations

#### Summary of Responses

Ten respondents provided comments in relation to Policy SP4. The comments can be summarised as follows:

- 40% expressed **support** for the policy, welcoming the positive contribution the LDP can make to improving community cohesion and promoting good relations and promoting shared city agenda. It was particularly welcomed as one of the main strategic policies, but noted that it may be difficult to put Policy SP4 into practice;
- The need for an agreed **definition** of what is meant by ‘shared’ or ‘shared space’;
- A number of respondents discussed the role of community infrastructure and shared services in creating and promoting access to **shared space**. It was noted that there is a need for accompanying programme support alongside physical regeneration and a need for integrated planning of services to promote/encourage sharing;
- Additional details are required regarding **housing** options. Cohousing was given as an example of housing that can contribute to the development of diverse communities, help develop community cohesion and good relations, build relationships and tackle conflict in a positive way;
- **Consultation** on strategic policies was narrowed to process only, but a broader conversation is required;
- Need to ensure that the **skills** of citizens keeps pace with the rate of development (new business etc.) to ensure inclusive growth;
- A number of comments in relation to **HMOs**, which are addressed more fully in the Section relation to Policy HOU10 Housing Management Areas.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council
<a href="#">DPS-A-QS-F</a>	Cohousingni
<a href="#">DPS-B-8K-E</a>	Department for Communities
<a href="#">DPS-B-9G-B</a>	Falls Community Council
<a href="#">DPS-B-8N-H</a>	Lisburn & Castlereagh City Council

Reference	Respondent
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-63-M</a>	Padraig Walsh
<a href="#">DPS-A-QT-G</a>	Sandy Row Community Forum
<a href="#">DPS-B-9D-8</a>	Shared City Partnership

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>Welcome the commitment as one of the strategic policies to improving community cohesion, promoting good relations and advancing shared city agenda. One of the respondents commented that it may be difficult to put Policy SP4 into practice.</p>	<p>Support for the proposed policy approach is welcomed.</p>
<p>Need to define what we mean by 'shared' or 'shared space'.</p>	<p>It is recognised that the terms 'shared' and 'shared space' mean different things to different people. The Plan supports the outcomes set out in the Belfast Agenda, including the creation of a City that is 'welcoming, safe, fair and inclusive for all'. The LDP will also align with the Council's draft Belfast Good Relations Strategy, which was subject to public consultation during early 2019, to help underpin the continued development of shared space in Belfast. The term shared space is used to describe space that is welcoming, accessible, good quality and safe. This can be further expanded in the context of physical development as part of subsequent SPG.</p>
<p>Addressing the issue of interfaces should be twinned with addressing access to a shared city. Community infrastructure is crucial to promote access to shared space and services and there is a need to encourage the use and development of shared spaces/services through integrated planning and accompanying programme support.</p>	<p>Policy SP4 recognises that the provision of good quality shared social and community infrastructure is critical for social cohesion. It sits alongside a number of other overarching strategic policies including Policy SP7: Connectivity and Policy SP8: Green and blue infrastructure network. The Plan therefore supports connectivity to and within the city by sustainable means and recognises that sustainable connectivity is vital to social inclusiveness and the ability of communities to access employment and services.</p> <p>The justification and amplification to Policy SP4 acknowledges that the early involvement of affected communities can play a significant role in building support for new development schemes and embedding good relations into the planning process. Figure 5.2 outlines a range of cross-community initiatives that can be used to work towards shared spaces, emphasising the need for a long term collaborative consultation process in building a</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>sense of belonging for everyone. This can be further expanded in the context of physical development as part of subsequent SPG.</p> <p>The approach to Policy SP4 is supported by Policy CGR1: Community cohesion and good relations, which highlights through criterion b) the need to support initiatives working towards the removal of peace infrastructure and territoriality in the physical environment. It also specifically addresses the need to improve connectivity (criterion c) and the important role of shared neighbourhood facilities and services (criterion d).</p>
<p>Additional details are required regarding housing options, with Cohousing providing a good example of how housing can contribute to the development of diverse communities, help develop community cohesion and good relations, build relationships and tackle conflict in a positive way.</p>	<p>The merits of Cohousing solutions in the context of building diverse, cohesive and sustainable communities are accepted. The relative benefits of a broader range of housing products, such as cohousing, are addressed in more detail under the summary of responses to Policy HOU5: Affordable Housing. The justification and amplification to HOU5 states that affordable housing should be delivered in mixed tenure developments, and that, as well as helping to promote community cohesion, this approach will help create a feeling of belonging and contribute to the development of sustainable neighbourhoods.</p>
<p>The consultation process was too narrow and there was not enough discussion with communities as to how the strategic policies will be shaped.</p>	<p>In considering the development of the Plan Strategy, the Council has taken into account the regional and local policy context, and considered the spatial issues arising from the Belfast Agenda, which itself was informed by a broad and inclusive consultation process.</p> <p>In addition, comments raised as part of the POP consultation were analysed and helped inform the development of the draft Plan Strategy. A full copy of the POP Public Consultation Report is available on the Council's website at: <a href="http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport">http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport</a>. This includes a summary of all the comments received and the Council's responses to them.</p>

Main Issue	Council Response
	<p>Further opportunities to continue the conversations with key stakeholders will be afforded through the preparation of subsequent SPG.</p>
<p>Ensure rate of development (new businesses etc.) keeps pace with the skills of all citizens to ensure inclusive growth.</p>	<p>Central to the Belfast Agenda is a commitment to supporting inclusive growth. A core focus of the LDP, as the spatial articulation of the Belfast Agenda, is ensuring that the city has an appropriate land supply to cater for growing and emerging economic growth.</p> <p>However, it has to be recognised that the LDP cannot address these challenges on its own and that it forms one part of a broader programme of work to address such issues. A key element of the Belfast Agenda, for example, is investment in activities to support skills development and job creation for our residents.</p> <p>As part of our planning function, the Council and its partners are also committed to working with developers to explore how Developer Contributions can contribute to the delivery of these activities, in line with the ambitions set out in the Belfast Agenda.</p> <p>By way of example, the Council's draft Developer Contributions Framework, states the Council will consider the use Developer Contributions to help mitigate the loss of economic development uses which is otherwise contrary to planning policy. This could be through support for employability and skills initiatives to enable displaced employees and people who may have sought employment at the site, to gain employment elsewhere. This may be through direct participation in work programmes and/or funding of programmes.</p>
<p>Houses in Multiple Occupation (HMOs) policies fail to achieve balanced communities.</p>	<p>Please see responses provided in the section of this report relating to draft Policy HOU10: Housing Management Areas.</p>

### Policy SP5 – Positive placemaking

#### Summary of Responses

Ten respondents provided comments in relation to Policy SP5, comments received included:

- Several respondents supported the policy.
- The policy criteria and its ability to be implemented effectively highlighted as policy considered aspirational.
- Greater consistency with dPS policies and regional policies mentioned.

#### Representations received

Reference	Respondent
<a href="#">DPS-A-QS-F</a>	Cohousingni
<a href="#">DPS-B-UQ-H</a>	Department of Communities – Historic Environment Division
<a href="#">DPS-B-9G-B</a>	Falls Community Council
<a href="#">DPS-B-8N-H</a>	Lisburn & Castlereagh City Council

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-1R-E</a>	Organisation
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-A-QT-G</a>	Sandy Row Community Forum
<a href="#">DPS-A-6U-P</a>	Organisation

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p><b>Support</b></p> <p>One respondent highlighted that in advance to potential new governance arrangements this policy can help make way for integrated approach to planning, that BCC and other agencies can begin the process of co-operation and collaboration and suggested a series of pilot studies to seek pragmatic solutions to the built environment issues to be rolled out over priority areas.</p>	<p>Council welcomes this comment, this policy will be utilised alongside others within the draft Plan Strategy to achieve positive well designed places for people throughout the city.</p>
<p><b>Clarification of policy</b></p> <p>Policy considered to contradict with SP2.</p>	<p>Well-designed places that contribute to placemaking should by their very nature be sustainable. The policy is not considered to contradict with SP2 which advocates sustainable development.</p>
<p>The policy is considered to be entirely aspirational and lacking in detail about what is</p>	<p>Both <i>'good design'</i> and <i>'placemaking'</i> are subjective terms that are difficult to</p>

Main Issue	Council Response
<p>meant by “good design” and “positive placemaking” in the context of Belfast and how it might be delivered.</p>	<p>define. A definition of the term ‘placemaking’ is included within the glossary of the draft Plan Strategy (pg. 299). These high level policies are supported by more detailed operational policies and SPG.</p>
<p><b>General comments</b></p>	
<p>Concern that strategic policies need further consultation to ensure the benefits to citizens and neighbourhoods.</p>	<p>These are overarching strategic policies that help deliver the key aims of the LDP and advocate greater consultation with communities throughout the planning process. These high level policies are supported by more detailed operational policies and SPG.</p>
<p>One respondent suggested the policy needed to make more reference to the historic environment for greater consistency with regional policy.</p>	<p>The draft Plan Strategy needs to be read as a whole and contains the necessary safeguards and policy requirements to prevent adverse impact being caused to the historic environment.</p>
<p>Unclear how these aspirational policies will be implemented.</p>	<p>The strategic policies represent eight key cross-cutting issues that are applicable to all development that help deliver the key aims of the LDP through the more detailed operational policies.</p>

### SP6 - Environmental resilience

#### Summary of Responses

**Seven** respondents provided comments in relation to **Policy SP6**. Of the comments submitted:

- Two respondents provide general comments of support, with one respondent also supporting an objective to develop local renewable energy schemes and ensure that new developments are resource and energy efficient;
- One respondent states that **SP6** is contrary to SPPS and RDS and requires more consideration of providing local facilities in deprived areas, thereby reducing need for (and cost of) travel;
- One respondent would like the **SP6** wording amended to include all other policy requirements;
- One respondent states that there is no up to date evidence or transport plan to support the policy objectives;
- One respondent states that the council should support the cohousing model, which promotes environmentally friendly building design;
- One respondent states that the policy has broad objectives and, whilst positive, the link to operational policy is unclear.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-A-6U-P</a>	Organisation (DPS-A-6U-P)
<a href="#">DPS-A-QS-F</a>	Cohousing NI
<a href="#">DPS-B-8N-H</a>	Lisburn and Castlereagh City Council

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-6X-S</a>	Translink
<a href="#">DPS-B-8Z-W</a>	RSPB NI

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Amend wording to include all other policy requirements - cross referencing.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies. The dPS should be read in its entirety and it is not necessary to duplicate specific policy provisions throughout the document.
Policy requires more consideration of deprivation and provision of local	BCC does not agree with issue. Both the RDS and SPPS recognise the importance of environmental resilience and the role planning plays in this. Therefore the dPS fully



Main Issue	Council Response
facilities – it is contrary to RDS and SPPS.	complies with RDS and SPPS. BCC note that these are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies. It is noted the LDP aims to better integrate land use planning and transport by reducing the need to travel and promoting development at accessible locations. Whilst tackling deprivation is largely outside the scope of the LDP the LPP stage can identify areas and further opportunities for investment and improvement.
There is no up to date survey or transport plan to support SP6.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies. The current transport plan provides an adequate evidence base pending the preparation of a new transport plan by Dfl.
The policy should support cohousing development, which promotes eco-friendly design.	The dPS supports the provision of a range of house types and tenure mixes across the city to meet local needs, including through any proposals based on the co-housing model. All new development should incorporate eco-friendly design principles in accord with other policies in the dPS. BCC considers that it is not necessary to make any reference to specific types of housing models throughout the dPS.
The policy has broad objectives rather than policies.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies.

### Policy SP7 – Connectivity

#### Summary of Responses

Ten respondents provided comments in relation to Policy SP7, which can be summarised as follows:

- One respondent made a number of comments relating to the difficulty of increasing density along public transport corridors, the need to focus on cleaner technologies to tackle air quality issues and the lack of reference to the Council's Car Parking Strategy.
- One respondent requested a reference to densification in the justification text.
- The definition of access was questioned, stating it is not just physical or spatial.
- The poor connectivity within deprived neighbourhoods and access to services was highlighted.
- One respondent disagreed with the policy approach to reduce the reliance on the private car, stating that lack of availability of car parking provision caused pollution and there should be more emphasis on autonomous vehicles/smart technology.
- One respondent suggested the addition of connectivity to the airport to the policy wording.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade and commerce
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-AZ-6</a>	George Best City Airport

Reference	Respondent
<a href="#">DPS-B-9G-B</a>	Falls Community Council
<a href="#">DPS-A-1G-3</a>	Individual
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-B-8C-6</a>	Individual
<a href="#">DPS-A-QS-F</a>	Cohousing NI
<a href="#">DPS-A-6Q-J</a>	Project Hope

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support was expressed for encouraging shared transport and active living options.	BCC welcome support for this policy approach.
One respondent requested a reference to densification in the justification text starting that increased density at key accessible locations will be key.	The Council would consider that this reference is already covered in the policy text. The justification text for SP7 states the following "This will require the intensification of mixed used development in accessible locations along existing and planned public transport corridors such as

Main Issue	Council Response
	the Belfast Rapid Transit routes. This will enable the development of a compact, walkable city with mixed-use communities, connected to high quality public transport and active travel networks." This statement clearly promotes densification of use in accessible locations.
View expressed that many of the low density transport corridors are Conservation Areas and cannot be intensified. Policy SP7 Connectivity should be drafted to reflect the existing nature of the city's arterial routes and transport corridors.	SPPS states that "planning authorities must deliver: increased housing density without town cramming: higher density housing development should be promoted in town and city centre and in other locations that benefit from high accessibility to public transport facilities. Policy BH2 - Conservation areas provides protection along with additional text within SPPS which states that "Within established residential areas it is imperative to ensure that the proposed density of new housing development, together with its form, scale, massing and layout will respect local character and environmental quality as well as safeguarding the amenity of existing residents."
Respondent stated policy SP7 should be amended as follows – 'The council will support connectivity to and within the city by sustainable transport modes, such as public transport, walking and cycling and support access to and from the airport which provides direct and convenient air access to locations outside of Belfast, including rest of the UK and beyond.'	It is not considered that text relating to access to and from the airport is required in Policy SP7. This can be considered in more detail at the local policies plan stage.
Concern was expressed regarding the poor connectivity within deprived neighbourhoods and access to services was highlighted	Poor connectivity mainly within deprived residential communities is acknowledged in the plan due to dominant road infrastructure and poorly designed housing areas. SP7 Connectivity is an overarching policy which seeks to support the integration of sustainable transport networks and land use to improve

## Council response to key issues raised

Main Issue	Council Response
	<p>connectivity. A number of more detailed policies within the strategy also seek to promote higher quality design for development proposals such as Policy DES 1 and supplementary guidance will be produced to give further guidance to developers. This will guide any new development proposals or redevelopment of existing areas.</p>
<p>View expressed that Belfast City Council's Parking Strategy and Action Plan should be incorporated into the Local Development Plan.</p>	<p>Technical Supplement 14: Transportation sets out the vision and objectives of the Council's Car Parking Strategy and Action Plan. The Strategy has informed the policy approach for a number of policies within the draft Plan Strategy and the Transportation elements generally. Policy SP7 "supports connectivity to and within the city by sustainable means". Policy TRAN 8 clearly states that "in dealing with development proposals for car parking the emphasis will be to allow parking provision that will assist in reducing reliance of the private car in particular for commuting into the city, help tackle growing congestion and bring about a change in travel behaviour". Policy TRAN 9 – Parking Standards within areas of parking restraint outlines reduced standards in the city centre and commercial areas outside Belfast City Centre.</p>

## Policy SP8 – Green and blue infrastructure network

### Summary of Responses

**Eleven** respondents provided comments in relation to **Policy SP8**. Of the comments submitted:

- One respondent supports the policy while making reference to certain geographical areas/projects and their success;
- One respondent agrees with the policy approach to protect and provide open space including a network of green and blue infrastructure and would like to see the council work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated;
- One respondent strongly agrees with **SP8** and makes additional reference to Urban Landscape Wedges;
- One welcomes the policy but recommends that the term 'historic environment' should be specifically included in the definition and supporting narrative to make the policy sound;
- One respondent while supportive of the intention to develop Green and Blue network states that there was no engagement;
- Two respondents object to the policy and state that the council should incorporate its specific aspirations for Green and Blue infrastructure that have reached an advanced stage and these should be integral to the plan strategy;
- One respondent states that open spaces should incorporate needs of those with sensory and developmental disabilities;
- One respondent objects that **SP8** is contrary to SPPS;
- One respondent states that the council should adopt its cohousing model, which supports active living, and should allocate sites for cohousing;
- One respondent states that the policy has broad objectives rather than policies.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-A-6U-P</a>	Organisation (DPS-A-6U-P)
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-A-QS-F</a>	Cohousing NI
<a href="#">DPS-B-8N-H</a>	Lisburn and Castlereagh City Council
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-99-W</a>	Historic Monuments Council (DFC)
<a href="#">DPS-A-1R-E</a>	Organisation
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council
<a href="#">DPS-A-6R-K</a>	Organisation

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>Policy unsound and suggests incorporation of council's specific aspirations for Green and Blue infrastructure that have reached an advanced stage and should be integral to the plan strategy.</p>	<p>BCC considers this strategic policy provides adequate support for green and blue infrastructure commensurate with the dPS stage. Any more detailed projects or proposals will be considered at the LPP stage. In addition BCC will engage further before finalising its GBIP.</p>
<p>Open spaces should incorporate needs of those with sensory and developmental disabilities</p>	<p>This is a detailed design matter that would be considered during the development management process. Nevertheless the dPS incorporates other policies that promote inclusive design and increased accessibility.</p>
<p>The policy is contrary to SPPS and RDS.</p>	<p>BCC does not agree with this issue. Both the RDS and SPPS recognise the importance of facilitating the protection and provision of green and blue infrastructure. Therefore the dPS fully complies with RDS and SPPS.</p>
<p>Should reference Urban Landscapes Wedges as community greenways</p>	<p>Welcome support in principle and note the additional comments in relation to Landscape Wedges. These are protected through the Landscape policies in the dPS. These form part of green and blue infrastructure. The dPS should be read in its entirety and it is not necessary to duplicate specific policy provisions throughout the document. Any detailed landscape wedge designations will be considered at the LPP stage.</p>
<p>Supportive of Green and Blue Infrastructure Network but lacked meaningful engagement to date on cross-boundary issues.</p>	<p>Welcome support. BCC will continue to work with a range of stakeholders including adjoining councils on matters relating to future community greenways. In addition the Metropolitan Working Group and further engagement on the GBIP will facilitate continued corporation with adjoining councils. In addition any detailed landscape wedge designations will be considered at the LPP stage.</p>

## Council response to key issues raised

Main Issue	Council Response
Should support active living and socially interactive communities through cohousing development	The plan promotes a range of house types and tenure mixes across the city to meet local needs, including through any proposals based on the co-housing model. BCC considered that it is not necessary to make any reference to specific types of housing models throughout the dPS. In addition, green and blue infrastructure promoted by the LDP through a range of policies (including SP8) helps to support active living and socially interactive communities.
The policy has broad objectives rather than policies.	These are overarching strategic policies that help deliver the key aims of the LDP through the more detailed operational policies.
While supportive of the policy <b>SP8</b> , it should make reference to the Historic Urban Landscape (HUL) approach and the benefits of referencing the Historic Environment.	Welcome support and note the additional comments in relation to the Historic Environment, which is referenced in other policies within the dPS. The dPS should be read in its entirety and it is not necessary to duplicate specific policy provisions throughout the document.

## Supportive- Site related

Comments	Council Response
Support for green and blue infrastructure network – Further comments about Laburnum Park Lands.	Welcome support. BCC also notes that this submission relates to a specific site and the future zoning of this site will be considered at the LPP stage.

## Council response to key issues raised

### Policy SD1 – Settlement hierarchy

#### Summary of Responses

There were seven respondents who commented on Policy SD1. Their comments can be summarised as follows:

- Four were broadly **supportive** of the policy given a focus for development on the Principal City of Belfast;
- Suitability of **open space** for development should be reviewed in areas of high housing demand. In such areas there should be a presumption in favour of development; and
- It is unclear where the **settlement limits** are drawn. There is a need for minor adjustments to the settlement development limit of Belfast.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited
<a href="#">DPS-B-8D-7</a>	Individual
<a href="#">DPS-B-UK-B</a>	Markets Development Association (MDA)

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council (ANBC)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The settlement hierarchy is sustainable given a focus for development on the Principal City of Belfast by reducing the need to travel and allowing development of an appropriate scale to the settlement in question.	Support for the proposed policy is welcome.
Policy SD1 is contrary to the SPPS as existing open space will be required in areas of high housing demand. In such areas there should be a presumption in favour of development.	The LDP is the appropriate place to consider the re-zoning of existing open space and how land correlates with areas of high demand. However, as part of the two-tier planning system, the zoning of land following consideration of such issues will be undertaken as part of the Local Policies Plan.
It is unclear where the settlement limits are drawn – the maps provided need more clarity. There is a need for	The map shown in Figure 6.2 is deliberately diagrammatic and for illustrative purposes only. The Settlement Development Limit will be



## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
minor adjustments to the settlement development limit of Belfast.	defined precisely as part of the Local Policies Plan.

## Council response to key issues raised

### Policy SD2 – Settlement Areas

#### Summary of Responses

Nine respondents provided comments in relation to Policy SD2, which can be summarised as follows:

- **Supporting** comments, noting the benefits of differentiation based on character and function;
- Suggestions for changes to the Settlement Areas, including:
  - Identifying the **City Airport** as a Regional Gateway, with a specific role and function;
  - Providing density guidance in relation to the **Belfast Harbour Area**;
  - Expanding the City Centre to include **Titanic Quarter**; and
  - Reviewing the **District Centre** designations.
- Communities should be engaged in a **co-design process** in relation to any designations; and
- The associated map needs more clarity to enable the **accurate identification of boundaries**.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-AZ-6</a>	George Best City Airport
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-A-QT-G</a>	Sandy Row Community Forum

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Supporting comments noted the benefits of differentiation based on character and function.	Support for the proposed policy approach is welcomed.
George Best Belfast City Airport suggested that the Airport should be specifically identified as a Regional Gateway, with a specific role and function. Reference was	See minor modifications regarding the importance of the City Airport as a regional gateway and enabler of economic growth. The Airport Public Safety Zone will be taken into account as a constraint when

Main Issue	Council Response
also made to the control of development in the Airport Public Safety Zone.	considering specific uses for land in the Local Policies Plan.
Density guidance should be provided in relation to the Belfast Harbour Area designation as a Settlement Area, as well as the implications for transport capacity.	This comment is addressed in relation to Policy HOU4, where density guidance is provided in relation residential development in different settlement areas. There are no changes required to Policy SD2 as a result.
The City Centre should be expanded to include Titanic Quarter (TQ) given its synergy with the City Centre. Comments noted that TQ is well aligned with the role and function of the City Centre, well connected and will help achieve the aspirations relating to the Waterside area outlined in Policy SD3.	This will be considered as part of the preparation of the Local Policies Plan. The map shown to illustrate this policy in Figure 6.2 is deliberately diagrammatic and for illustrative purposes only, with the exact extent of each of the Settlement Areas, including the Harbour Area and City Centre, to be defined in detail as part of the Local Policies Plan.
Not all District Centres serve their intended function and should therefore be reviewed.	A review of all Local and District centres will be undertaken against a list of pre-defined criteria as part of the Local Policies Plan preparation. The map shown in Figure 6.2 is deliberately diagrammatic and for illustrative purposes only at this stage.
Query regarding the location of Sandy Row within the inner city/City Centre area.	The exact extent of each of the Settlement Areas, including the Inner City and City Centre will be defined in detail as part of the Local Policies Plan. The map shown in Figure 6.2 is deliberately diagrammatic and for illustrative purposes only at this stage.
Suggestion that communities should have been engaged in a co-design process in relation to any such designation.	The exact extent of each of the Settlement Areas, including the Inner City and City Centre will be defined in detail as part of the Local Policies Plan. This will be subject to additional community engagement and public consultation as part of its preparation.
The map provided to illustrate the settlement areas needed more clarity to enable the accurate identification of boundaries.	The map shown in Figure 6.2 is deliberately diagrammatic and for illustrative purposes only. The exact extent of each of the Settlement Areas will be defined in detail as part of the Local Policies Plan.

## Council response to key issues raised

### SD3 - City centre

#### Summary of Responses

Thirteen respondents provided comments in relation to policy SD3. Of the comments submitted:

- Supporting comments, noting the benefits of supporting the Policy SD3 City centre.
- Queried the extent of the City Centre Boundary.
- Queried the green and blue infrastructure on Map Fig 6.3.
- Raised matters about master planning and engagement.
- Training / Social Inclusion should be considered.
- Raised matters concerning opportunity for social enterprises, regenerative benefit of neighbourhood employment sites and connectivity of neighbourhoods to the city centre.
- Issues concerning the supporting evidence base.

#### Responses received

Reference	Respondent	Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners	<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive	<a href="#">DPS-A-QN-A</a>	West Belfast Partnership Board
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade & Commerce	<a href="#">DPS-A-QW-K</a>	MJM Group
<a href="#">DPS-A-1G-3</a>	Individual	<a href="#">DPS-B-UK-B</a>	Markets Development Association (PART 1)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure – Transport Strategy Division, Roads and Rivers – Roads, Public Transport Division & Safe and Sustainable Travel Division	<a href="#">DPS-B-86-S</a>	East Belfast Community Development Agency
		<a href="#">DPS-A-6Z-U</a>	Professor Austin Smyth
		<a href="#">DPS-B-A8-4-1</a>	Belfast Harbour Commissioners and Titanic Quarter
		<a href="#">DPS-A-6Q-J</a>	Project Hope

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Fig 6.3 It is not clear what the green and blue infrastructure alignments shown are	The concept map shown in figure 6.3 is deliberately diagrammatic and for illustrative purposes only. The exact extent of a green and blue infrastructure network in the City Centre, will be defined in detail as part of the Local Policies Plan.

Main Issue	Council Response
<p>City centre ordered into different uses, and four separate districts defined. Clarity is required. Spatial Development Strategy is not appropriate, and focus should be mixed use.</p> <p>Require a holistic City Core vision. Consulting on the preparation of district Master plans.</p>	<p>Policy SD3 provides a holistic vision for the development of the city centre recognising that there are distinct character areas that provide diversity and opportunities for investment and development. It proposes to protect the retail uses in the city centre core to ensure it fulfils the requirement of RDS SFG3, to support and strengthen the distinctive role of Belfast City Centre as the primary retail location in Northern Ireland. The operational Retail Policies in the draft Plan Strategy will define the appropriate uses for the city centre core to ensure a compact diversity of offer to maintain its attractiveness and resilience as a prime shopping location. The Waterfront, Innovation, and Mercantile Districts, are broad character areas within the city centre that clearly brand the city's opportunity areas to attract and guide potential investors and developers. Policy SD3 promotes mixed use commercial and residential schemes to improve the diversity of land uses within the city centre to facilitate the growth of the knowledge economy that would strengthen the City Centre's position as the economic driver for the region. The Council agrees that master planning and consultations is a critical component in developing robust master plans.</p>
<p>Without proper management, the innovation district will cause further inequalities in north Belfast. Programme of upskilling to ensure local people can compete for new jobs in the innovation district.</p>	<p>The Council recognises that training and upskilling to secure employment opportunity in the emerging knowledge economy is key to enabling inclusive economic and social growth. This is outside the remit of the LDP. This matter will be addressed in the Community Plan - Belfast Agenda's priority for "Working and Learning."</p>
<p>Support focus on the districts for investment. Want policy reference to neighbourhood regeneration.</p>	<p>SD3 is a strategic spatial development policy specific to the city centre to ensure it is the primary business location in Northern Ireland. The draft Plan Strategy does outline in the operational policy EC2 Employment Land Supply, paragraph 8.1.4 (page 147) "The council must ensure that an adequate supply of land is available, on sites in a</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>range of locations, sizes and conditions, to attract investment into the city and to support existing business sectors. This is in line with the policies and objectives of the SPPS and recognises the importance that an adequate supply of employment land plays in the economic success of the city.” PolicyEC2 Major Employment and Strategic Employment Locations (page 149) has a priority focus to provide a number of key employment areas within the city. The exact location and extent of the designated employment lands will be defined in detail as part of the Local Policies Plan. This should help to ensure that economic investment and development can assist in the regeneration of disadvantaged neighbourhoods.</p>
<p>Need more focus on the social economy, and solutions to remove blight to regenerate areas.</p>	<p>The Social economy is cover under the work streams contained in the Belfast Agenda and sits outside the scope of the LDP.</p> <p>The reference to vesting sites is outside of the remit of the LDP and is a planning legislative matter.</p>
<p>Integrate city centre economic growth with local neighbourhoods to ensure sustainable development.</p>	<p>The SPPS sets a hierarchy of how some uses ought to be directed to the city centre to maintain its regional function. However, connectivity has been considered in the Justification and Amplification section Page 56 paragraph 6.3.3, reference the need to connect the adjacent neighbourhoods to the City Centre by the green and blue infrastructure network, and high quality routes that are accessible to all sections of the community. The operational Transportation Policies are encouraging sustainable forms of transport to reduce the reliance on private car journeys, i.e. TRAN1, TRAN3, TRAN4 and TRAN8. This should help to reduce congestion and commuter parking in residential areas. The draft Plan Strategy is also promoting balanced growth to achieve vibrant neighbourhoods, and local centres to secure sustainable development.</p>

Main Issue	Council Response
<p>Lacks a robust evidence base or a coherent strategy. No mechanisms for delivery and monitoring. Provide supporting evidence</p> <p>.</p>	<p>The 17 technical supplements provide the baseline (updated in 2018), and studies supply the evidence base, to inform the draft Plan Strategy. However they should be read together, as there are interrelated matters that cannot be considered in isolation to help understand the rationale and justification for the proposed policies. The technical supplements expand on the 18 thematic topic papers prepared and published alongside the Preferred Options Paper in 2017, which established the baseline position as at April 2017 and identified the key issues that need to be addressed in the LDP. Evidence was also drawn from the information gathered in the preparation of the Belfast Agenda, which outlines a programme of activity to deliver the Council's Community Plan. The Delivery Chapter 11 outlines how the draft Plan Strategy is to be implemented and monitored throughout the plan period.</p>
<p>Extent of northern waterfront District boundary. Defining City Districts should not be restrictive. Support investment in all parts of the City Centre, which do not prevent non-conforming' uses.</p>	<p>SD3 provides the overarching policy to guide development in the city centre. Four broad character areas have been identified to encourage new sustainable mixed-use development to facilitate population and economic growth. The Policy intention is to stimulate investment and to facilitate the growth of the knowledge economy that would strengthen the City Centre's position as the economic driver for the region. This would help to deliver a sustainable compact vibrant mixed use city centre.</p>
<p>Titanic Quarter is located outside the city centre, and excluded from the Waterfront district. Modify the City Centre boundary to include Titanic Quarter into the Waterfront District.</p>	<p>The respondents' comments are premature and are only relevant at the Local Policy Plan Stage. The concept map shown in figure 6.3 is deliberately diagrammatic and is for illustrative purposes only. The exact extent of each of the Districts in the City Centre, will be defined in greater detail as part of the Local Policies Plan. Likewise the extent of the Harbour Area, which includes Titanic Quarter will also be defined in detail as part of the Local Policy Plan.</p>

### Policy HOU1 – Accommodating new homes

#### Summary of Responses

20 respondents provided comments relating to Policy HOU1. Three respondents **supported** or welcomed the ambitious targets for new homes, as well as the sequential approach to the distribution of units across the settlements as set out in Policy HOU1;

Many of the issues raised reflected those also raised in relation to Policy SP1 - Growth strategy, which is not surprising given that Policy HOU1 reflects the overall housing growth outlined in Policy SP1. These correlating issues can be summarised as follows:

- Suggestion that the overall target for new homes are **unrealistic and unachievable**, particularly in relation to the indicative build rates for the final period;
- Set against this was the suggestion that the policy should revert back to the original **higher target** for new additional homes (37,000) as set out in the Preferred Options Paper (POP);
- The housing aspirations conflict with regional planning aims and the Regional Development Strategy (RDS) as they **exceed the stated Housing Growth Indicators (HGIs)**;
- Comments in relation to the **cross-boundary implications** of the housing growth;
- The need to consider the **transport implications** arising from housing growth, including the impact upon the transport network, parking implications and how the transport network can facilitate growth;
- Infrastructure concerns or a lack of evidence about how **infrastructure requirements** can be met, most notably sewage and waste water demands. It was suggested that detailed infrastructure plan is needed across the wider metropolitan area, including details of costs and timeframes for delivery;
- Concerns regarding the proposed **indicative average annual rates** for three phases of the plan period. This included a risk that more suitable/viable sites may be restricted, an associated lack of flexibility within the plan and unrealistic annual average rates for the final period (2030-2035); and
- Specific issues raised in relation to the **zoning of land** that will arise from the proposed housing allocations. Concerns included alignment of land with need, differentiation in terms of land supply in different areas of the city and the likely lack of available land for housing in east Belfast and west Belfast to provide family housing.

Several respondents questioned the soundness of the **evidence base** for Policy HOU1 in relation to the number and distribution of homes, the impact of growth in neighbouring districts and the implications for transport and wider infrastructure networks. Again, there is a considerable amount of synergy between these responses and questions raised in relation to the evidence base for Policy SP1: Growth strategy, given that it is the overall growth strategy that sets the context for distribution of housing growth. A number of respondents



## Council response to key issues raised

suggested that the existing evidence base presented was insufficient or not robust, but offered no alternative evidence or suggestions of improving the baseline information.

Specific suggestions for additional evidence that were made included:

- More detail regarding the distribution of land to accommodate new homes;
- Account taken of housing provision up until 2020 (i.e. the start of the LDP plan period);
- Evidence of wider policy/strategy required to support the growth outlined in SP1 and HOU1;
- Evidence to substantiate that the required rates of housing delivery can realistically be delivered;
- An assessment of the effect on the market of such large numbers of homes becoming available in a short period;
- Further evidence on how the growth will impact on neighbouring areas; and
- Additional work in relation to transport, including an up-to-date survey of transport network capacity and traffic in the district, an assessment of transport needs, an up-to-date Transport Plan and accessibility analysis for individual sites.

In addition to the issues outlined above, the comments/suggestions made specifically in relation to Policy HOU1 can be summarised as follows:

- Comments relating to the delivery of **housing in the city centre**, most notably that it will be difficult to deliver family housing, which is the most in demand housing type;
- Questioning the zero net provision of housing in **Hannahstown**, based on affordable housing need and changing demographics in the area;
- The allocation for the **'Rest of Belfast'** is too general and should illustrate how the 18,100 figure will be allocated across different areas of the city;
- The allowance made for **windfall housing** is too low;
- Highlighting the need to consider greenfield sites beyond the current **settlement limits** to facilitate housing growth; and
- **Specific sites** being advocated for housing development within the district, including land in Hannahstown, Twinbrook/Poleglass and Glenmona.

A number of other miscellaneous comments were also made by a range of respondents, which can be summarised as follows:

- Given the emphasis placed on new housing being delivered on previously developed or brownfield land, there is a need to consider the re-zoning of excess **employment land** (whether zoned or un-zoned) for housing;
- The focus on high density housing development will result in a failure to address the significant requirement **for family housing**; and
- That **prematurity** should be applied to avoid an increase in planning applications in order to avoid policy provisions, which may be in place post-plan adoption, prejudicing the ability of the plan to achieve the strategic objectives and aims.

## Council response to key issues raised

Finally, a number of comments were made in relation to the overall plan making process, including:

- Reference to comments made during the **Preferred Options Paper (POP) consultation** relating to the need to achieve sustainable development within environmental limits and subjecting current zonings to accessibility analysis; and
- Concerns in relation to the **sustainability** of the proposals, including infrastructure implications, transport implications and the sustainability of the growth aspirations in relation to ecosystem services, such as water provision.

## Responses received

Reference	Respondent
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-HP-3</a>	Eastside Partnership
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited

Reference	Respondent
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-8N-H</a>	Lisburn & Castlereagh City Council
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-6R-K</a>	Organisation
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-B-8E-8</a>	Organisation
<a href="#">DPS-B-8R-N</a>	Organisation
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-A-6X-S</a>	Translink

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Support or welcome for the ambitious targets for new homes, as well as the sequential approach to the distribution of units across the settlements as set out in Policy HOU1.	Support for the proposed policy approach is welcomed.
<b>Housing growth too high</b>	
The overall target for new homes are unrealistic and unachievable, particularly in	The growth aspirations represent the Council's commitment to population and jobs growth set out in the Belfast Agenda, which is ambitious and capitalises

## Council response to key issues raised

Main Issue	Council Response
<p>relation to the indicative build rates for the final period.</p>	<p>on the role of Belfast as the driver of the regional economy. The level at which this is set is based on robust evidence provided in the Housing Growth Options report.</p> <p>As set out within Technical Supplement 2: Housing (TS02), the average rate of housing delivery proposed over the plan period is comparable with historic build rates recorded through the housing monitor, which has demonstrated the ability of the development industry to sustain a level of house building over and above the level required to achieve the Plan Strategy's allocation during the economic peaks of the mid-2000s.</p> <p>For comments in relation to the indicative annual rates, please see the section addressing 'Phasing' issues below.</p>
<p>Achievement of housing growth targets will be highly dependent on the housing policies adopted in neighbouring district areas and on the extent to which greenfield development is able to contribute to overall targets.</p>	<p>The Council acknowledge that development opportunities outside of the Belfast district may have implications for the delivery of housing within Belfast. The Council will continue to engage with neighbouring Councils via the Metropolitan Area Spatial Working Group (MASWG) to highlight any areas of concern and discuss issues of mutual interest. The Council will also continue to monitor the emerging plans in neighbouring areas and will provide formal comments as part of the relevant consultation processes. Any concerns regarding the impact of proposals within neighbouring districts will therefore be addressed as and when they arise. Please see also comments relating to 'Cross-boundary implications' below.</p> <p>Given the significant level of inward commuting to employment opportunities within Belfast, it is more sustainable in terms of reducing the need to travel and encouraging walking and cycling to locate new homes within Belfast's district rather than in more peripheral locations of neighbouring districts. In the latter case, this would lead to more trips into Belfast via private car, which Belfast's existing road network is unable to accommodate. It is notable that the Housing Growth Options study retains commuting at a fixed rate when</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>modelling future growth, which helps to minimise the effect on neighbouring districts. However, to not plan to accommodate the required growth within the District, when the Urban Capacity Study suggests there is sufficient land for housing, would contravene legal principles by assuming future policy decisions in neighbouring Districts<sup>1</sup>.</p> <p>It is also apparent that much of the available land in neighbouring districts is greenfield, whilst Belfast has a significant volume of brownfield land available. In accordance with the SPPS sequential approach it is preferable to regenerate brownfield sites within Belfast than to rely on greenfield development in more peripheral locations of neighbouring districts. Please see also comments relating to 'Windfall' below.</p>
<b>Growth too low</b>	
<p>The policy should revert back to the original target for new additional homes (37,000) as set out in the Preferred Options Paper (POP). The 37,000 new homes target should be distributed on a pro rata basis to the various settlements/areas (with a revised table included to reflect distribution of a revised target on a pro-rata basis).</p>	<p>The level of housing growth set out in the draft Plan Strategy is in line with the 37,000 new homes quoted in the POP for the period 2014-2035. As set out in paragraphs 4.03-4.04 of Technical Supplement 2: Housing, this figure has been adjusted to reflect the 15 year plan period (2020-2035) and to take account of the shortfall since 2014.</p> <p>As noted above, this rate of proposed growth is ambitious, but is set at an appropriate level in accordance with the robust evidence contained within the Housing Growth Options report. It is therefore not considered appropriate to increase the rate of growth beyond that stated.</p> <p>On-going monitoring of housing supply and land availability will ensure that 5 year supply of land will be maintained throughout the plan period, with reviews of policy and allocation to be reviewed if necessary.</p>
<b>Conflict with Regional Development Strategy (RDS)</b>	
<p>The housing aspirations conflict with regional planning aims and the Regional Development</p>	<p>DfI acknowledge within their response (<a href="#">DPS-B-U5-N</a>) to the draft Plan Strategy that "the HGI is not a target to be achieved, or a cap on development", but that it</p>

<sup>1</sup> See 'Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, p9

## Council response to key issues raised

Main Issue	Council Response
<p>Strategy (RDS) as they exceed the stated Housing Growth Indicators (HGIs).</p>	<p>rather provides a starting point for considering the level of housing likely to be required to meet housing need. In this context, exceeding the HGI for the district therefore offers no conflict with the RDS and can be justified by robust evidence.</p> <p>The Housing Growth Options report uses a robust methodology to link housing growth to economic outcomes, providing a comparison to the HGIs as part of the process. The report itself notes that the HGIs are “an important reference point for the development of planning policy” but analysis indicates “an apparent risk that planning to accommodate population and household growth as projected under the official datasets may result in a changing population profile which will not support anticipated employment growth.”</p> <p>Additional technical clarifications to the Housing Growth Options Report have been provided by Turley and Edge Analytics relating specifically to the economic implications of limiting housing growth to the proposed HGI levels. It concludes that “the HGI would provide a labour force capable of supporting 18,500 jobs in Belfast”, rather than the 46,000 new jobs predicted, without requiring unrealistic changes to key trend assumptions such as commuting, unemployment rates or double jobbing.<sup>2</sup></p> <p>The housing growth proposed in the draft Plan Strategy therefore instead reflects the level of housing required to support the predicted baseline employment growth.</p>
<p>Despite the concerns regarding alignment with the RDS, DfI note that the transport elements broadly align with the strategic direction of regional policy and the RDS.</p>	<p>The recognition that the proposed approach aligns with the direction of travel set out in the PfG, RDS and current approach to regional transportation is welcomed.</p>

<sup>2</sup> See ‘Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, p13

## Council response to key issues raised

Main Issue	Council Response
<b>Cross boundary implications – Housing Market Area / Belfast Metropolitan Area (BMA)</b>	
<p>The cross-boundary implications of housing growth are unclear for neighbouring areas and the Council should have regard to the wider impact of housing delivery on the wider Belfast Metropolitan Area (BMA), based on the revised Housing Market Area boundaries produced by NIHE in August 2018.</p>	<p>Clearly, a sound understanding of the functional housing market area is important when developing housing policies for a specific District within. The SPPS states that the NIHE will carry out the Housing Market Analysis required to inform the LDP. The Housing Market Analysis Update (September 2017) was therefore prepared by NIHE specifically to “inform Local Development Plans (LDP) housing policies...” In addition to the update provided in 2017, the Council have also had regard to the original ‘Belfast Metropolitan Housing Market Area: A Local Housing System Analysis’ (NIHE, 2011).</p> <p>Additional technical clarifications to the Housing Growth Options Report have been provided by Turley and Edge Analytics relating specifically to understanding the implications of housing market areas. It notes that whilst local authorities may need to demonstrate ‘an understanding’ of their housing market area geography, it is nevertheless necessary at some point to focus on the District given that the SPPS is clear that a Plan Strategy must be prepared for specific the Council area.<sup>3</sup></p> <p>Within the 2017 update report, NIHE note that the analysis relates to the Belfast area and acknowledged that the housing market area boundaries were under review, with revisions to be published in 2018. However, the new Housing Market Areas were only published in August 2018, so weren’t available at the time the Plan Strategy was developed. The implications of any up to date housing market analysis for the wider Belfast metropolitan housing market area will be considered when available.</p> <p>The Council will therefore keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the</p>

<sup>3</sup> *Ibid*, pp21-23

## Council response to key issues raised

Main Issue	Council Response
	<p>independent examination. Any subsequent updates to market analysis taking account of actual delivery as part of the plan period will also be considered as part of the Council's routine monitoring once the Plan Strategy is adopted.</p> <p>Furthermore, at the time of publication of the draft Plan Strategy, the Council completed analysis of the emerging housing growth projections across the region to ensure cumulative effects were understood. This ensured that the growth proposed would not adversely affect the general balance between the Belfast Metropolitan Area and rest of NI. Further details are provided as part of the council's response to issues raised under Policy SP1.</p>
<p>Developments in neighbouring areas within travelling distance of Belfast, which are often greenfield sites that are easier to deliver, will have implications for the delivery of housing within Belfast's district.</p>	<p>The Council acknowledge that development opportunities outside of the Belfast district may have implications for the delivery of housing within Belfast. The Council will continue to engage with neighbouring Councils via the Metropolitan Area Spatial Working Group (MASWG) to highlight any areas of concern and discuss issues of mutual interest. The Council will also continue to monitor the emerging plans in neighbouring areas and will provide formal comments as part of the relevant consultation processes. Any concerns regarding the impact of proposals within neighbouring districts will therefore be addressed as and when they arise.</p>
<p><b>Transport</b></p>	
<p>There is a need to consider the transport implications arising from housing growth, including the impact upon the transport network, parking implications and how the transport network can facilitate growth.</p>	<p>The SPPS places an importance on the interrelationship between the location of local housing, jobs, facilities and services and infrastructure. Belfast's continued success at creating new employment opportunities has exacerbated transport problems associated with housing being provided outside of Belfast. This has created patterns of long commutes and stress on transport infrastructure.</p> <p>The policies contained in the Transportation section of the Plan Strategy outline an approach to deliver sustainable patterns of development which reduce the need to travel and policies which clearly prioritise active</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>travel and travel by public transport. This approach aligns with the direction of travel set out in the PfG, RDS and current approach to regional transportation.</p> <p>We believe that it is more sustainable in terms of reducing the need to travel and encouraging walking and cycling to locate new homes within Belfast's district rather than in more peripheral locations of neighbouring districts. In the latter case, this is likely to lead to more trips into Belfast via private car, which Belfast's existing road network is unable to accommodate. There is evidence within SA/SEA process of how transport implications in a general sense have been taken on board in assessing the sustainability of our preferred approach.</p> <p>The BMTP 2004 will continue to be the extant transport plan until such times as its replacement is adopted. Furthermore, the Interim Belfast City Centre Transport Framework review undertaken in 2016 was in part an attempt to plan for the impact of major new development in the city centre that was either currently under construction or already had planning permission.</p>
<p><b>Infrastructure</b></p>	
<p>Concerns about how infrastructure requirements can be met, most notably sewage and waste water demands. It was suggested that detailed infrastructure plan is needed across the wider metropolitan area, including details of costs and timeframes for delivery.</p>	<p>The SPPS notes the need to manage growth in a sustainable way, placing particular emphasis on the importance of the inter-relationship between the location of local housing, jobs and infrastructure. DfI are the statutory authority responsible for regional infrastructure provision and would therefore be the appropriate authority to produce a BMA Infrastructure Plan.</p> <p>The council are currently completing a Belfast Infrastructure Study, which will help identify where investment is needed and the associated risks, which can be addressed at the LPP stage. For clarity the LPP will need to address infrastructure requirements in a supplement to the Delivery chapter of the draft Plan Strategy. This work could be refined to formally address mitigation measures outlined in the SA in terms of</p>



## Council response to key issues raised

Main Issue	Council Response
	<p>specific initiatives such as Sustainable Urban Drainages Systems (SuDs).</p> <p>It should be noted that a significant amount of infrastructure requirements have already been considered by the relevant infrastructure providers. The latest housing monitor (2018/19) identifies land for over 22,000 housing units, a significant proportion of which already have extant planning approval or have been previously zoned for housing through the BMAP processes. The infrastructure authorities, as statutory consultees in the development management and previous plan development processes, have therefore already recognised that the existing infrastructure networks would need to be able to accommodate such growth.</p>
<b>Phasing</b>	
<p>Concerns relating to the proposed indicative average annual rates for three phases of the plan period. It was suggested that the phasing of housing land could prevent more suitable/viable sites being developed, with an associated lack of flexibility (soundness test CE4) within the plan. It was also suggested that the annual average rate of the final period (2030-2035) were unrealistic and unachievable. The removal of this phasing element was recommended to make the Plan sound.</p>	<p>The need for a phased approach to housing delivery within Belfast arises as a result of two issues. Firstly, the SPPS notes the need to manage growth in a sustainable way, placing particular emphasis on the importance of the inter-relationship between the location of local housing, jobs and infrastructure. Where infrastructure constraints are identified, there may therefore be a need to phase the delivery of housing to align with infrastructure investment. This will be considered in more detail as part of the Local Policies Plan, informed by the pending Belfast Infrastructure Study.</p> <p>Secondly, the economy is still within a period of recovery and there is still short-term uncertainty associated with Brexit. Although the economic outlook for the plan period to 2035 is relatively positive, the current rate of delivery, although rising, is still below where it needs to be to meet housing need. However, it is realistic to assume that as the economy improves during the plan period, that the level of housing delivery will also step up in pace to meet increasing demand.</p> <p>Nevertheless, the annual average required to meet the housing demand over the 15 year period is unlikely to</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>be achieved in the short term (e.g. 2020-2025), meaning that without a phased approach for monitoring purposes, there is a risk that annual monitoring could necessitate an early review during the first 5 year period. The indicative average annual rates within Policy HOU1 are therefore clearly articulated as monitoring parameters rather than operational 'requirements'.</p> <p>Given that the latest housing monitor (2018/19) identifies land for over 22,000 housing units, a significant proportion of which already have extant planning approval or have been previously zoned for housing through the BMAP processes, it is unlikely that these monitoring phases are going to constrain development in the short-term. The Council therefore believe that the broad ranges provided as indicative average annual rates will provide sufficient flexibility over the plan period, particularly given that higher levels of growth will most likely occur in the later part of the plan period.</p>
<b>Zoning</b>	
<p>A number of specific issues were raised in relation to the zoning of land that will arise from the proposed housing allocations, including:</p> <ul style="list-style-type: none"> <li>• Whether the available land aligns with regarding where needs in different parts of the city; and</li> <li>• The lack of differentiation in terms of land supply in different areas of the city and the likely lack of available land for housing in east Belfast and west Belfast, especially to provide family housing.</li> </ul>	<p>The zoning of land for housing is a statutory requirement and one which will ensure a planned approach to future housing delivery, which is appropriate to ensure infrastructure and services can also be effectively planned.</p> <p>In addition to the comments made above in relation to phasing, the zoning of land and how it correlates with areas of housing need, will be considered in detail as part of the Local Policies Plan.</p>
<b>Evidence base</b>	
<p>More detailed evidence should be provided regarding the</p>	<p>A high level review of the existing housing land supply was carried out as part of the Urban Capacity Study. The associated maps provide a broad indication of</p>

## Council response to key issues raised

Main Issue	Council Response
distribution of land to accommodate new homes.	where future housing may be accommodated, but will be supplemented by more detailed analysis to inform land zonings and designations to be considered as part of the subsequent Local Policies Plan.
Evidence need to take account of the housing provision up until 2020 (i.e. the start of the LDP plan period).	As set out in Figure 5 of Technical Supplement 2, the level of housing growth proposed within the draft Plan Strategy has been adjusted to take account of the shortfall in housing delivery between prior to 2020, including both the actual shortfall 2014-2017 and a realistic estimates of any likely shortfall during 2018/2019.
Evidence should outline the wider policy/strategy support required for the growth outlined in HOU1.	<p>It is recognised that the growth aspirations are ambitious and that public sector intervention may be required to help deliver the step change required. As noted above, notwithstanding the unknown effect of Brexit, the economic forecast for the plan period is positive and the proposed housing growth is closely aligned to potential economic growth.</p> <p>The LDP is only one element in a complex dynamic and the Council are continuing to assess the likely market impact of the emerging housing policies alongside potential incentives and measures to stimulate the different residential sectors. To date this has involved primary market research prepared by Colliers International which acknowledges that “public sector intervention in the form of a market stimulus may be required” in the short term to support market adjustments to the new policy environment.<sup>4</sup></p> <p>The Belfast Region City Deal is designed to deliver a step change in our region’s economic fortunes, help achieve a 15 year programme of inclusive growth, an increase of £470m Gross Value Added and create up to 20,000 new and better jobs, accessible to people from all communities. Although these benefits will be shared across the wider metropolitan area, not to mention the wider regional economy, the City of Belfast will remain at the core.</p>

<sup>4</sup> See ‘Report to Belfast City Council’s Development Planning and Policy Unit to consider the impact of its proposed housing policies (as set out Belfast Local Development Plan Draft Plan Strategy) on the residential property market located within the planning area’, April 2019, Colliers International

## Council response to key issues raised

Main Issue	Council Response
	<p>Alongside this, the Plan Strategy itself includes a range of broader policies that will help support growth, such as policies relating to density of development, tall buildings, affordable housing, housing mix, delivering inclusive economic growth, etc. Furthermore, the Council also continue to work with key partners around the delivery of various aspects of growth, such as city centre regeneration and mechanisms for the delivery of affordable housing.</p> <p>As noted above, in the light of the comments received, the Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination.</p>
<p>Evidence should be provided as to how the Council will achieve the required step change in net migration referenced within the Housing Growth Options report.</p>	<p>The Housing Growth Options Report specifically considered migration flows as part of the development of growth scenarios. Migration is strongly influenced by the economy and trend-based projections, such as those used to generate the HGIs, risk extrapolating recessionary trends into the future. Instead the preferred growth scenario is based on a robust methodology that uses realistic assumptions around future migration to and from other NI districts, the UK and internationally, linked to economic growth, rather than being based solely on past trends.</p> <p>In addition, the report illustrates at Figure 3.22 that natural change (i.e. migration is modelled with a neutral impact) is forecast to represent a significant driver of population growth in the future. The migration assumptions therefore serve to suppress the growth that would materialise as a result of natural population change, resulting in a reduction in the level of housing that would otherwise be required.</p> <p>This is made more explicit within the additional Technical Clarifications that have been provided by Turley relating specifically to the migration flows associated with the recommended growth scenarios.<sup>5</sup></p>

<sup>5</sup> See 'Technical Response to Comments on the Draft Plan Strategy for Belfast, July 2019, Turley, pp14-20

## Council response to key issues raised

Main Issue	Council Response
	<p>This illustrates how inward migration from the rest of the UK and the rest of the world, rather than from within NI, can ensure that "Belfast could achieve and maintain the net inflow [of residents] required to grow...without affecting the established trend of that has seen other districts continue to receive a net inflow from Belfast over recent years."</p>
<p>Evidence is required to substantiate that the required rates of housing delivery can realistically be delivered, particularly the sustained high level required in the final 5 year period.</p>	<p>As noted above, as set out in TS02, the level of housing proposed is comparable with historic build rates recorded through the housing monitor, which has demonstrated the ability of the development industry to sustain a level of house building over and above the level required to achieve the Plan Strategy's allocation during the economic peaks of the mid-2000s. Whilst the current economy is still within a period of recovery and there is still short-term uncertainty associated with Brexit, the economic outlook for the plan period to 2035 is relatively positive and has been bolstered by the recent City Deal approval. It therefore remains realistic to assume that as the economy improves, the level of housing delivery will also step up in pace to meet increasing demand.</p>
<p>Evidence should include an assessment of the effect on the market in Belfast and the wider Belfast Metropolitan Area of such large numbers becoming available in a short period.</p>	<p>The council have commissioned work to assess the likely market impact of emerging housing policies, which will involve primary market research with the development industry to try and predict the potential market impact of the emerging LDP housing policies on development in different areas of the City.</p> <p>However, as noted above, the level of housing proposed is comparable with historic build rates, so shouldn't represent a difficulty for the local market given that demand continues to remain well above the available supply. The development industry have demonstrated both an ability and desire to sustain a level of housing supply building over and above the average level required to achieve the Plan Strategy's allocation during the economic peaks of the mid-2000s.</p>
<p>Require further evidence on how the significant growth will impact on neighbouring areas.</p>	<p>This issue is addressed fully in the section on cross-boundary implications within the Belfast Metropolitan Area (BMA) above.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Additional evidence is required in relation to transport implications, including an up to date survey of the existing transport network capacity and traffic of the district, an assessment of the transport needs in the Plan area, an up-to-date Transport Plan and accessibility analysis for individual sites.</p>	<p>Comments relating to the transport implications arising from housing growth and the impact upon the existing transport network are addressed more fully in the section on 'transport' above.</p> <p>DfI are the statutory authority responsible for regional transport and are currently developing a new Transport Strategy for the wider Belfast Metropolitan Area. Until that time, the Council will continue to have regard to the existing Belfast Metropolitan Transport Strategy, as well as the findings of the Interim Review in 2016.</p> <p>In relation to accessibility, although high level analysis has been undertaken as part of the Urban Capacity Study. This is illustrated within our 2015 baseline assessment of housing land<sup>6</sup> through the summary of the relative accessibility of the housing land supply in Belfast via public transport, specifically Translink Metro and Glider services. This shows that over 95% of available dwelling units from sites in the 2017/18 housing monitor were within 200m of a bus route or bus stop and that almost all of the units are within 400m. This high level accessibility analysis will be supplemented by more detailed work to help inform the zoning of land as part of the Local Policies Plan process to be undertaken following adoption of the Plan Strategy.</p>
<p><b>City centre</b></p>	
<p>Comments relating to the delivery of housing in the city centre included the difficulty in delivering family housing, which is the most in demand housing type. It was noted that medium-high density apartment/flat developments will not cater for young families.</p>	<p>Creative and innovative design solutions are available to enable the delivery of a range of housing options within the City Centre. This includes the potential to provide accommodation suitable for families whilst still delivering higher density development.</p> <p>Policy HOU6: Housing Mix sets out the requirements for a suitable mix of house types and sizes to be provided in new developments, but notes that the exact mix of house types and sizes will be negotiated with developers on a case by case basis. In addition, in response to the evidence base for the LDP, the policy</p>

<sup>6</sup> Appendix D2 – 2015 Housing Baseline

## Council response to key issues raised

Main Issue	Council Response
	<p>makes specific reference to the need for smaller homes across all tenures to meet future household requirements, which can be easily accommodated within higher density city centre development.</p>
<b>Hannahstown</b>	
<p>The zero net provision of housing in Hannahstown was questioned, with 20 additional units required in Hannahstown to meet affordable housing need and a need for more, smaller homes to serve the future likely demand trend resulting from changing demographics in the area.</p>	<p>Whilst it is recognised that additional housing may be required within Hannahstown over the plan period, this is not precluded by the net zero homes requirement for the settlement. Analysis of historic housing monitor data and background research undertaken as part of the Urban Capacity Study process indicate capacity within the existing settlement development limit of Hannahstown to secure well in excess of 20 units. Giving no specific housing requirement for the Hannahstown, will minimise any pressure for expansion of the settlement into the countryside, with a particular risk for Hannahstown of coalescence between the two distinct parts of the settlement. Should social or private housing be brought forward within Hannahstown this would instead form part of the windfall allowance made within Policy HOU1.</p> <p>By contrast, Edenderry has land available within the existing settlement limit with an extensive planning history, including mixed use development, non-residential development and pending planning applications for a low density residential development. There is therefore likely to be more pressure for housing land in Edenderry than in Hannahstown, which may necessitate a revision to the settlement development limit at the LPP stage. Similarly, Loughview has little land available within the existing settlement, which again may necessitate revising the settlement limit at the next stage. The housing requirements in these instances will therefore provide a stronger justification for the formal review of the settlement development limits for these small settlements within the LPP of the plan process.</p>
<b>Rest of Belfast</b>	
<p>The allocation for the 'Rest of Belfast' is too general and it should be illustrated how the</p>	<p>As noted above, a high level review of the existing housing land supply was carried out as part of the Urban Capacity Study and the associated maps provide</p>

## Council response to key issues raised

Main Issue	Council Response
<p>18,100 figure will be allocated across different areas of the city. It was suggested that the greatest demand is in north and west Belfast.</p>	<p>a broad indication of where future housing may be accommodated. However, further detail analysis will be carried out to inform the zoning of land as part of the subsequent Local Policies Plan process. This will include consideration of how land correlates with areas of housing need.</p>
<p><b>Windfall</b></p>	
<p>The windfall allowance was too low and it is unlikely that sufficient land can be zoned to accommodate the housing requirements without greater reliance on windfall development. A number of respondents suggest reviewing the evidence base to re-calculate the appropriate level for windfall.</p>	<p>Within the new plan-led system, BCC intend to take a more coherent approach to the identification of land, including mixed use development opportunities, within the Local Policies Plan process. This will have the impact of significantly reducing the reliance on 'windfall' supply going forward.</p> <p>Whilst historic levels of windfall delivery may have been significantly higher than that proposed within the draft Plan Strategy, a significant proportion of historic housing supply was delivered on un-zoned (i.e. windfall) land, due to the absence of an up to date development plan against which to record such changes (until the initial BMAP adoption). In addition, BMAP treated development on mixed-use sites as windfall, further exacerbating the reliance on windfall land for the supply of housing. This anomaly has since been rectified through the refinement of the Housing Monitor data.</p> <p>The windfall allowance made within Policy HOU1 is based on robust analysis of the historic supply of residential units on sites in the Urban Capacity Study. It concludes that below the size threshold for future zoning (i.e. yielding less than 5 units) and the level of delivery has averaged 94 units per annum (2000-2015). This is derived from historic housing monitor data, which takes account of all development with a net gain in units. This approach addresses the queries in relation to windfall supply for 'sub-divisions', 'change of use' and/or 'demolition and redevelopment' within existing residential areas.</p>
<p>It was also suggested that the windfall allowance should be removed from Policy HOU1, being replaced instead with a</p>	<p>Policy HOU2 provides a general policy in relation to windfall housing development and it is therefore considered unnecessary for such a statement to be included within Policy HOU1. Nevertheless, the Council</p>



## Council response to key issues raised

Main Issue	Council Response
<p>general statement recognising the need for windfall development to meet overall housing need.</p>	<p>will continue to monitor the delivery of housing from windfall sources over the plan period as part of the regular monitoring requirements and will make any necessary adjustments should the trigger identified in Appendix F of the draft Plan Strategy be reached.</p>
<b>Settlement limits</b>	
<p>There is a need to consider greenfield sites beyond the current settlement limits to facilitate housing growth. The LDP is the most appropriate mechanism to make such decisions. It was noted that high levels of housing delivery in the past have relied more on greenfield than brownfield land.</p>	<p>Analysis of Belfast's historic housing delivery set out within TS02 confirms that Belfast's housing supply has been consistently in excess of 90% on brownfield land, even during the peak levels of delivery in 2004-2007. Nevertheless, Policy HOU1 does not preclude the provision of some of the district's new housing requirement over the plan period on land outside of the existing settlement limit. As part of the subsequent Local Policies Plan process, all available land will be assessed and prioritised in accordance with the sequential approach outlined in the SPPS.</p>
<b>Site specific comments</b>	
<p>A number of specific sites were advocated for housing development within the district, including land in Hannahstown, Twinbrook/Poleglass and Glenmona.</p>	<p>Any sites proposed as part of Plan Strategy consultation process will be considered as part of the subsequent Local Policies Plan process. This will build upon the high level findings of the Urban Capacity Study, but will be supplemented by more detailed analysis of specific sites. A call for sites may be undertaken as part of this subsequent process, at which point new sites can be promoted by landowners and developers. Nevertheless, suggestions made at this stage can form part of the review process at this later stage.</p>
<b>Miscellaneous issues</b>	
<p><b>Employment land</b> Given the emphasis placed on new housing being delivered on previously developed or brownfield land, there is a need to consider the re-zoning of excess employment land (whether zoned or un-zoned) for housing.</p>	<p>The zoning or re-zoning of land will be considered in detail as part of the Local Policies Plan. This will include the examination of the suitability and capacity of any excess employment land for residential development. The Urban Capacity Study already notes in Section 4.3 that some sites within existing employment areas may be suitable for residential development.</p>
<p><b>Family homes</b> The focus on high density housing development will result in a failure to address the</p>	<p>Within the district overall, the Council are content that ample land is available for the delivery of the full range of housing required over the plan period. More detailed analysis of the need in terms of the size and type of</p>

## Council response to key issues raised

Main Issue	Council Response
<p>significant requirement for family housing.</p>	<p>houses needed is contained within the Addendum to the Housing Growth Study on the 'Size and Type of Housing Needed' as a result of the preferred growth scenario.</p> <p>As noted above, creative and innovative design solutions are available to enable the delivery of a range of housing options, including housing for families, within higher density development. Policy HOU6: Housing Mix sets out the requirement for a suitable mix of house types and sizes to be provided in new developments, but notes that the exact mix will be agreed on a case by case basis.</p>
<p><b>Prematurity</b></p> <p>Prematurity should be applied to avoid an increase in planning applications in order to avoid policy provisions, which may be in place post-plan adoption, prejudicing the ability of the plan to achieve the strategic objectives and aims.</p>	<p>Paragraphs 1.10 of the SPPS notes that a "transitional period will operate until such times as a Plan Strategy for the whole of the council area has been adopted." It goes on to state that local planning authorities should continue to apply existing Departmental policies and guidance, such as the suite of retained Planning Policy Statements (PPSs), during this 'transitional period'. This in effect limits the extent to which prematurity can be applied whilst the Plan Strategy is in draft form, as no direct mention is made of weight to be afforded to emerging LDP policies as part of these transitional arrangements.</p> <p>However, Paragraph 5.73 of the SPPS notes that prematurity can be applied where individual development proposals are so substantial, or whose cumulative effect would be so significant, that to grant planning permission would prejudice the outcome of the plan process. The absence of site specific policies within the Plan Strategy may therefore make the application of prematurity on these grounds difficult to substantiate. Nevertheless, the Council will continue to consider the implications of proposed development on LDP objectives during the transitional period to identify if any proposals raise concerns in terms of prematurity.</p>
<p><b>Response to Preferred Options Paper (POP)</b></p>	<p>Comments raised as part of the POP consultation were analysed and helped inform the development of the draft Plan Strategy. A full copy of the POP Public</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Comments made during the POP consultation relating to the need to achieve sustainable development within environmental limits and the need for current zonings to be subjected to accessibility analysis have not been taken fully into account when drafting the Plan Strategy.</p>	<p>Consultation Report is available on the Council's website at: <a href="http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport">http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport</a>. This includes a summary of all the comments received and the Council's responses to them.</p> <p>In relation to accessibility, although high level analysis has been undertaken as part of the Urban Capacity Study, this will be supplemented by more detailed analysis to help inform the zoning of land as part of the Local Policies Plan process to be undertaken following adoption of the Plan Strategy</p>
<b>Sustainability</b>	
<p>Concerns were raised in relation to the sustainability appraisal process, with suggested omissions including:</p> <ul style="list-style-type: none"> <li>• Clarity regarding the likely infrastructure implications arising from proposed growth, alongside growth in neighbouring areas; and</li> <li>• The use of out-dated information in relation to an assessment of transport implications.</li> </ul> <p>Concerns were also raised regarding the sustainability of the growth aspirations in relation to ecosystem services, such as water provision.</p>	<p>Detailed response included within summary of SA responses.</p>

## Council response to key issues raised

### Policy HOU2 – Windfall housing

#### Summary of Responses

14 respondents provided comments in relation to Policy HOU2, two of which were broadly supportive, welcoming a positive approach to the development of housing on un-zoned land whilst ensuring such development still meets sustainable development standards, with the necessary infrastructure to support development. The remaining 12 respondents cited a range of concerns in relation to the Policy, which can be summarised as follows:

- Some respondents suggested that the policy has the potential to encourage **increased supply** of housing from windfall sources. In contrast, other respondents suggest that the proposed policy will **downgrade or curtail windfall** housing provision unnecessarily, removing flexibility from the Plan;
- Arguing that it will not be possible to accommodate all new housing development on brownfield land. It was suggested that the wording of Policy HOU2 be amended to take cognisance of the fact that some new housing development is likely to be delivered on **lands outside of the urban footprint** and outside of the existing settlement development limit, as well as the need for an exceptions test in relation to greenfield development;
- Noting that the presumption that all new housing should be delivered on brownfield land within the urban footprint should not apply to the housing allocated **to small settlements**. This housing must be delivered within the small settlements;
- The policy should not ignore the proposed policy of using **excess employment land** for housing;
- Suggestion that a number of terms used within the policy require **definition**, including 'suitable', 'accessible' and 'convenient';
- Suggestion that the **policy should be removed** given that most of its provisions reflect normal planning considerations. A new policy could instead be introduced to advocate the prioritisation of previously developed land within the existing urban footprint when zoning land for housing; and
- Concerns raised under HOU2 relating to the **level** of allowance made for windfall.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council (ANDBC)
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-A-6N-F</a>	Braidwater Ltd
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited

Reference	Respondent
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation (CEF)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (DfI)
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-A-6A-2</a>	LATNER 10

## Council response to key issues raised

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-6R-K</a>	Organisation

Reference	Respondent
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-B-8R-N</a>	Organisation
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Broad support for the policy, welcoming a positive approach to the development of housing on unzoned land whilst ensuring such development still meets sustainable development standards, with the necessary infrastructure to support development.	Support for the proposed policy is welcomed.
The policy, as currently drafted, has the potential to encourage supply from windfall sources, contrary to reduction in the allowance implied through a more proactive approach to the zoning of land in the plan and the low windfall allowance made for in Policy HOU1.	See response under Policy HOU1 for comments in relation to the level of windfall housing allocation made. Policy HOU2 is intended to help manage harmful impacts, such as greenfield development, that could arise from the increased pressure for housing development resulting from the ambitious growth aspirations. It is therefore unclear why this would actively encourage windfall housing.
The proposed policy will downgrade or curtail windfall housing provision unnecessarily, removing flexibility from the Plan (Soundness Test CE4). It was suggested that windfall housing is the only provision during an economic downturn.	It is unclear how this policy is likely to curtail windfall housing, other than developments on unzoned, greenfield sites outside of the urban footprint. This reflects best practice in that the development plan process is the appropriate place to consider and make provision for greenfield/urban extensions. It is intended to help manage harmful impacts that could arise from the increased pressure for housing development resulting from the ambitious growth aspirations, but should serve to facilitate appropriate redevelopment on un-zoned brownfield land.
It will not be possible to accommodate all new housing development on brownfield land. This is an optimum position that is not supported by the evidence base, including the Urban Capacity Study and	Policy HOU2 does not preclude the provision of some of the district's new housing requirement over the plan period on greenfield land outside of the existing urban footprint. As noted above, the Local

## Council response to key issues raised

Main Issue	Council Response
<p>historic levels of brownfield land delivery. There are often difficulties associated with bringing forward brownfield development in comparison to greenfield land and the RDS recognises that not all brownfield land will be suitable for housing development.</p> <p>It was suggested that the wording of Policy HOU2 should be amended to take cognisance of the fact that some new housing development is likely to be delivered on lands outside of the urban footprint and outside of the existing settlement development limit. A need for an exceptions test in relation to greenfield development was also raised.</p>	<p>Development Plan is the appropriate place to consider the merits of greenfield development. This will be undertaken as part of the Local Policies Plan process with available land to be assessed and prioritised in accordance with the sequential approach outlined in the SPPS. It is therefore considered that no exceptions test is required in relation to un-planned greenfield development.</p> <p>Policy HOU2 will therefore only apply to land that isn't zoned for residential development and is intended to help manage harmful impacts that could arise from the increased pressure for housing development resulting from the ambitious growth aspirations. It should serve to facilitate appropriate redevelopment on un-zoned brownfield land.</p>
<p>The policy should not ignore the proposed policy of using excess employment land for housing. However, no changes to the policy were proposed.</p>	<p>The Council will consider the re-use of excess employment land for housing as part of the Local Policies Plan process to be undertaken following adoption of the Plan Strategy. Where windfall development is brought forward on zoned employment land outside of the formal development plan process, developments would have to demonstrate compliance with both Policy EC4 and Policy HOU2.</p>
<p>The presumption that all new housing should be delivered on brownfield land within the urban footprint should not apply to the housing allocated to small settlements. This housing must be delivered within the small settlements.</p>	<p>Provision will be made for the housing need identified within Belfast's three small settlements in accordance with Policy HOU1 as part of the Local Policies Plan. Re-development of un-zoned previously developed land within small settlements will continue to be subject to usual planning considerations and wider policies on housing in settlements. Policies relating to development in the countryside, such as Policy DC2 and Policy DC8, will be relevant for developments on the edge of small</p>

## Council response to key issues raised

Main Issue	Council Response
	settlements, with a general presumption against such developments.
A number of terms used within the policy require definition as part of the justification and amplification text. This includes 'suitable' within criterion a) and 'accessible and convenient' in criterion b). This could be addressed within the justification and amplification text.	The suitability of land for a particular use, such as housing, is a frequently used policy test, the meaning of which is widely understood. Similarly, 'accessibility' and 'convenience' in terms of location are widely used throughout existing planning policy and as such do not require specific definition in relation to this policy. Inevitably, such policy 'tests' often require professional judgement as to whether each individual criterion has been met in a specific instance. The justification and amplification text therefore does provide high level guidance as to how this policy should be applied in practice and this could be further supported by SPG should further clarification be required in the future.
The policy should be removed given that most of its provisions reflect normal planning considerations when taking forward development on unzoned land. Instead, the policy should be replaced with a policy advocating the prioritisation of previously developed land within the existing urban footprint when zoning land for housing.	Policy HOU2 as currently drafted achieves both of the suggested outcomes – i.e. a policy advocating prioritisation of brownfield land within the urban footprint and setting out a range of planning considerations for assessing future planning applications for housing development on un-zoned windfall land.
Concerns were raised under HOU2 relating to the level of allowance made for windfall within the draft Plan Strategy.	See response under Policy HOU1: Accommodating new homes. This has been considered under the summary of responses to that policy, alongside other comments made in relation to the level of windfall allowance.

## Council response to key issues raised

### Policy HOU3 – Protection of existing residential accommodation

#### Summary of Responses

Five respondents provided comments in relation to Policy HOU3. Of the comments submitted:

- Three respondents expressed **support for/welcomed** the policy. One of the respondents stated support for the approach to ensure a permanent supply of residential stock and the exception for community infrastructure to help support sustainable communities. The respondent added that its Asset Management Strategy, dealing with Northern Ireland Housing Executive (NIHE) tower blocks, may result in the need for additional sites to meet total housing need in the event of any demolition of the existing blocks. A second respondent welcomed the approach as important for inner-city communities, but suggested it should go beyond the retention of residential stock to also provide protection to long established communities. The remaining respondent supported the approach and reference to community infrastructure, but suggested additional developments should incorporate local neighbourhoods in regeneration opportunities through parking permits, thoroughfares and local amenities.
- One respondent suggested the **definition** of established residential areas in Appendix B is overly restrictive and compromises the future sustainable development of existing residential areas.
- It was stated that planning permission is not required for the demolition of buildings, and therefore, the policy is in direct **conflict with the law**.
- A respondent argued the policy presumption in favour of retaining residential stock has no caveats that would reflect the **quality of residential accommodation** and could impact on the ability to meet housing growth targets, for example, in instances where it would be preferable to remove dwellings to increase density or develop new buildings that better meet modern living conditions.
- Attention was drawn to the need for development of lands fronting a city corridor to be complementary to surrounding residential uses and have no adverse effects on residential amenity. It was suggested that this is unnecessary and **duplicates RD1 policy**.
- Reference was made to **short-term let (STL) accommodation**. It was suggested the policy is not strong enough to protect existing residential communities and that it does not protect the residential stock in areas of high residential need; with not enough emphasis on the regulation of STL accommodation.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-UK-B</a>	Markets Development Association

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-6U-P</a>	Organisation



## Council response to key issues raised

Reference	Respondent
DPS-B-9Z-X	Sinn Fein

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>Three respondents expressed support for/welcomed the policy.</p> <ul style="list-style-type: none"> <li>One respondent stated support for the approach to ensure a permanent supply of residential stock and the exception for community infrastructure to help support sustainable communities. The respondent added that its Asset Management Strategy, dealing with NIHE tower blocks, may result in the need for additional sites to meet total housing need in the event of any demolition of the existing blocks.</li> <li>A second respondent welcomed the approach as important for inner-city communities, but suggested it should go beyond the retention of residential stock to also provide protection to long established communities.</li> <li>The remaining respondent supported the approach and reference to community infrastructure, but suggested additional developments should incorporate local neighbourhoods in regeneration opportunities through parking permits, thoroughfares and local amenities.</li> </ul>	<p>Support for the proposed policy approach is welcomed.</p> <ul style="list-style-type: none"> <li>The Council recognise the importance of promoting choice to meet housing need. However, it is acknowledged that the NIHE are without options appraisals recommended by the Asset Management Strategy and therefore the exact implications of the strategy are unknown. Notwithstanding, lands for residential use will be identified at the Local Policies Plan (LLP) stage. In this context, and as part of the ongoing LDP process, the Council will engage with the NIHE.</li> <li>The Plan needs to be read as a whole. The protection of established communities can be helped through the Plan policies that seek to achieve a more geographic dispersal of shared forms of housing as a means of sustaining balanced communities.</li> <li>The Council seeks to support connectivity to and within the city. This is stated in Policy SP7 along with the policy aim to safeguard land for sustainable transport infrastructure projects and maximise opportunities to protect and enhance existing provision. It is considered that sustainable connectivity will help improve the ability of local communities to access local amenities. The responsibility for implementing Residents Parking Schemes lies with the Department for Infrastructure (DfI) and is outside of the remit of the Plan to address.</li> </ul>

## Council response to key issues raised

Main Issue	Council Response
<p>The definition of established residential areas in Appendix B is overly restrictive and compromises the future sustainable development of existing residential areas.</p>	<p>This definition aligns with the definition of an established residential area, as contained in existing planning policy (i.e. Annex E of the Addendum to Planning Policy Statement 7: Safeguarding the Character of Established Residential Areas) and is considered necessary in order to support proposed policies.</p> <p>It is not considered that the definition is overly restrictive and compromises the future sustainable development of existing residential areas. In fact, the proposed wording recognises that some established areas have a less uniform pattern of development. It also notes that future developments may necessarily differ from existing densities, where this can be achieved in a sustainable way, in keeping with the established character of an area, in accordance with design requirements.</p>
<p>Planning permission is not required for the demolition of buildings. The policy is in direct conflict with the law.</p>	<p>The Council note the comments, but consider Policy HOU3 appropriate. Notwithstanding provisions with regards to heritage assets, the Council acknowledge that planning does not control the demolition of buildings where permitted by law. However, Policy HOU3 sets a clear statement of intent to retain existing residential stock for permanent residential use and legislative provisions need to be considered in that context. The redevelopment of vacant lands (where made vacant through prior demolition) will be subject to the same planning considerations in respect of compatibility with adjacent land-uses, impact on amenity, etc. as proposals for redevelopment and/or change of use of existing dwellings for other uses.</p>
<p>Policy HOU3 seeks to retain existing residential stock. This policy has no caveats</p>	<p>The policy approach would not preclude the redevelopment of sites containing existing</p>

## Council response to key issues raised

Main Issue	Council Response
that would reflect the quality of residential accommodation. Many development sites remove dwellings to increase density on a site. It is difficult to see how the Council will deliver 31,660 dwellings in Belfast on brownfield land where there is a presumption to retain all housing stock irrespective of quality or its ability and design to meet modern living standards.	residential stock where the proposed use is residential.
The policy refers to the need for development of lands fronting a city corridor to be complementary to surrounding residential uses and have no adverse effects on residential amenity. This is unnecessary and duplicates RD1 policy.	Policy RD1 deals with new (build) residential development whereas Policy HOU3 deals specifically with the redevelopment and/or change of use of existing dwellings to other uses. Criterion a) of Policy HOU3 is therefore necessary.
With regards to short term holiday accommodation, the policy is not strong enough to protect existing residential communities. It does not protect the residential stock in areas of high residential need and there is not enough emphasis on the regulation of this type of development.	The Plan needs to be read as a whole. STL accommodation falls outside of the residential use class. The change of use from a permanent residential use to STL accommodation is considered a material change requiring planning permission. As well as meeting the requirements of Policy HOU3, applications for change of use to STL accommodation will usually be subject to wider policy requirements, including those of Policy HOU13.

### Policy HOU4 – Density of residential development

#### Summary of Responses

22 respondents provided comments in relation to policy HOU4. Of the comments made, 45% of respondents (10) were broadly **supportive** of the policy. Notwithstanding, a number of concerns were also raised, which in summary included:

- A lack of clarity as to whether HOU4 will be interpreted strictly as **a policy or a guide** to determine applications;
- Suggestion that policy be reworded into a **more generalised** form;
- The need for **flexibility** in the policy, on a site-by-site basis, allowing for example lower densities in the inner city to cater for a preference for family sized units, or higher densities in areas already characterised by such developments;
- Specific comments relating to a number of the **character areas** identified in the Plan:
  - **Tall buildings:** policy states that locations will be identified, contrary to policy DES3, which does not refer to a locational-based policy. This needs clarified with respect to tall buildings in the city centre;
  - **Inner city:** this should be defined in the policy and a map included;
  - **Outer Belfast:** densities are too low and should be increased;
  - **City corridors:** policy should identify these routes and enable densification along them; and
  - **Harbour area:** query as to why this is not included in HOU4, given the significant housing allocation to this area and the number of protected sites.
- The need for **increases in density** generally to meet project demand;
- Specific **density concerns** relating to town cramming and overshadowing, compatibility with existing character and the need for detailed site analysis;
- Suggested **exemption** from policy requirements for major regeneration/masterplan sites including those with a waterfront location;
- Comments relating to the provision of **amenity/open space**, including both relaxation of requirements to allow for higher densities, but also the need to ensure adequate amenity space as part of high density developments;
- Highlighting the need for the policy to be adjusted to account for **mixed-use development**;
- The policy should make reference to modifying **parking standards** to permit the achievement of quality higher densities;
- A number of respondents questioned the soundness of the evidence base in relation to:
  - How it has been determined that the **density bands are realistic or achievable**, taking account of other policies, in particular RD1; and
  - Whether or not the density bands prescribe a density that is **inconsistent with the planning context** and the already approved and completed developments in Belfast – specific reference made to the amended TQ Development Framework (and the Concept Masterplan and Design Principles documents) together with the

## Council response to key issues raised

already approved and completed developments in Titanic Quarter, along the East Bank.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-81-M</a>	Agent
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners & Titanic Quarter
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus Healthcare Developments
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations (NIFHA)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-8R-N</a>	Organisation
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-8Z-W</a>	RSPB
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-Q9-N</a>	Total Architecture

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Broad support of the policy, noting alignment with the SPPS, flexibility through the range of acceptable densities and the intent to increase density without town cramming.	The Council welcomes the support for draft policy HOU4.
<b>Guide or policy?</b>	
A number of respondents refer to a tension in the policy – the opening paragraph stating that development proposals should accord with the density bands,	The proposed density bands have taken account of variations in the character areas by using higher and lower density limits. Rather than being a discrepancy, the draft policy wording has deliberately tried to provide both clarity and flexibility for developers. The policy is intended to provide certainty in that

## Council response to key issues raised

Main Issue	Council Response
<p>the final paragraph referring to them as a guide.</p>	<p>developers know if they are within the stated broad bands, the density of their proposed development will generally be acceptable. It also allows for developments outside of these broad bands to be considered on a case-by-case basis, subject to meeting all other policy requirements.</p> <p>This approach is considered to be the best option given the intention to grow the city, whilst ensuring a high design standard, protecting amenity and ensuring sustainable development.</p>
<p>Information should be moved to the Local Policies Plan (LPP) and clearly identified as a guide.</p>	<p>As noted in the comments submitted, the Plan Strategy is the first document in a two stage process. The SPPS emphasises the need for higher densities in settlements without town cramming. This coupled with the Council's significant growth aspirations, justifies the strategic need for a policy on density. The subsequent local policies plan will allow for the assessment of specific sites, with scope for any implications in terms of proposed densities to be addressed as appropriate through key site requirements.</p> <p>However, at this stage the policy as currently drafted outlines the clear direction of travel at this stage in the plan process, embodying the strategic principle of increasing densities in highly accessible locations, with all of the benefits in terms of sustainable development which that offers. The broad bands are intended to provide sufficient flexibility to ensure new development can be adapted to meet the broad requirements, although there also remains a caveat to allow for the review of individual schemes on their merits.</p> <p>The Plan Strategy also notes at Appendix E that the policy will be supported by Supplementary Planning Guidance (SPG), which can provide further clarity on the requirements.</p>

## Council response to key issues raised

Main Issue	Council Response
<b>More generalised wording</b>	
<p>Suggestion that the policy is reworded into a more generalised form as follows:</p> <p><i>'An increase in the density of housing and mixed use developments will be promoted in town and city centres and other locations which benefit from high accessibility to public transport facilities.'</i></p>	<p>The re-wording of the policy into a more generalised form would mirror almost exactly the wording currently contained within the SPPS. The proposed policy offers greater detail in that it offers bespoke guidance as to what this should look like in a Belfast-specific context and is considered an appropriate out-working of the regional strategic policy for housing in settlements. As noted above, this policy offers the best balance between certainty for developers and flexibility to consider exceptions on a case by case basis.</p>
<b>Flexibility</b>	
<p>Request for flexibility within the inner city, to facilitate the potential for affordable housing delivery at lower densities, to meet the need for family households.</p>	<p>Currently, the draft policy includes a lower limit of 75 dwellings per hectare (dph) for the inner city, which reflects existing patterns of development and existing planning approvals. However, it does build in flexibility in that proposals outside of the broad bands will be considered on their merits, subject to other policy requirements.</p> <p>In terms of affordable housing delivery, the Housing Market Analysis prepared by NIHE to inform the LDP's development notes that "the predominance of single person and small family households on the waiting list will mean that smaller units and higher densities will be required in the future." Creative and innovative design solutions are available to enable the delivery of a range of housing options, including housing for families, within both higher and lower density development at different locations across the city. The inclusion of larger 3 bed flats, for example, within new city centre developments, particularly where these are affordable homes, could encourage larger households, including families to move there. The Council is therefore content that the proposed densities will not act as a barrier to meeting affordable housing need across the city.</p>
<p>Density requirements will vary on a site-by-site basis and should be well informed by site assessments</p>	<p>Detailed site assessments will be carried out as part of the subsequent LPP stage to inform the zoning of land. If appropriate and necessary at that stage, the Council could utilise key site requirements (KSRs) to</p>

## Council response to key issues raised

Main Issue	Council Response
to understand constraints and locational opportunities	provide more specific density criteria that will take account of any site-specific matters. This could include consideration of constraints that limit put back on a site or could highlight opportunities for higher densities. In addition, the proposed SPG can provide additional information to assist in developing suitable densities for future residential schemes.
Reference to some developments along city corridors being well in excess of the stated density band – higher densities should be permitted where they already exist	<p>The SPPS recognises the potential for higher density housing development at locations with high accessibility, to help maximise the use of existing infrastructure. Draft policy HOU4 has taken account of this by proposing higher densities along city corridors up to 175dph within the inner city and up to 150dph in outer Belfast.</p> <p>Although it cannot automatically be assumed that where densities in excess of the bands currently exist, it would be appropriate to reciprocate them, such a factor would certainly form part of a number of considerations at individual site level.</p>
<b>Character areas</b>	
<p><b>Tall buildings</b></p> <p>A number of respondents note a discrepancy between Policy HOU4 and DES3 Tall Buildings. HOU4 refers to a density based policy approach whereas DES3 only applies to buildings over 35 metres in height, which will be assessed against a criteria based assessment.</p>	<p>The Urban Design &amp; Built Heritage technical supplement that accompanies the dPS refers to existing and emerging clusters of tall buildings being identifiable within and bordering the city centre. It also advises that further detailed analysis will be carried out within these broad clusters at the LPP stage, which may include taller building locational-based assessments. This is what HOU4 is referring to in terms of identifying locations and this ties in with criteria (d) of DES3, which refers to “contributing to a cluster...when grouped together”. It should also be noted that Policy HOU4 refers solely to residential development while Policy DES3 applies to all forms of development. Further detail in relation to this can also be addressed in future SPG relating to density or urban design (see Appendix E of Plan Strategy). (See also minor modifications).</p>
<p><b>Inner city</b></p> <p>Boundary should be defined and a map included.</p>	<p>The exact extent of the inner city will be defined in detail as part of the LPP. The map shown in Figure 7.3 is deliberately diagrammatic and for illustrative purposes only at this stage.</p>



## Council response to key issues raised

Main Issue	Council Response
<p><b>Outer Belfast</b> The densities are not high enough and should be increased.</p>	<p>The proposed density bands were informed by a robust evidence base, which has assessed existing residential developments, housing monitor approvals and site-specific studies of traditional housing areas. As already noted above, it is important to strike a suitable balance between meeting housing needs whilst ensuring quality developments appropriate to their locations, which do not compromise amenity or environmental quality. In this context, it is considered that the proposed bands are appropriate. As previously noted, however, this does not preclude proposals outside of the proposed band on a site-by-site basis where a developer can justify the provision of a higher density.</p>
<p><b>City corridors</b> Clarity is needed and these routes should be clearly designated at dPS stage. The policy should also be adapted to enable densification along the city corridors rather than restricting to the current densities – suggestion of 250-300dph.</p>	<p>As noted above, although shown illustratively on Figure 7.3, the exact extent of the city corridors will be defined in detail as part of the LPP.</p> <p>AS previously noted, the intention of the policy is to encourage increased densities whilst ensuring quality developments appropriate to their locations, which do not compromise amenity or environmental quality. In this context, it is considered that the density bands proposed, which have taken account of existing and permitted development in the relevant character areas, are appropriate and should not be altered. That said, the policy does allow for proposals outside of the proposed bands on a site-by-site basis where a developer can justify the provision of a higher density.</p>
<p><b>Harbour area</b> Despite being listed in Policy HOU1 (housing allocations) and in Policy SD2 (settlement areas), the Harbour Area is not identified as an area with appropriate density guidance within Policy HOU4. As it also contains a number of internationally protected sites, appropriate densities should be clarified</p>	<p>The Harbour Area is a diverse area that will not all be appropriate for residential development. Those areas that are likely to accommodate new homes have already been subject to detailed master planning, through the TQ Development Framework and a number of extant planning consents for residential development. This has helped to inform the allocation set out in HOU1 and, as such, it is intended that detailed, site-specific guidance can be provided through KSRs as part of the Local Policies Plan. This approach, together with the detailed assessment of</p>

## Council response to key issues raised

Main Issue	Council Response
together with information on transport capacity.	individual proposals, will be sufficient to determine appropriate residential densities within the area.
<b>Increases in density</b>	
Densities need to be increased to ensure that projected housing demand can be met.	The proposed density bands were informed by a robust evidence base, which has assessed existing residential developments, housing monitor approvals and site-specific studies of traditional housing areas. As already noted above, it is important to strike a suitable balance between meeting housing needs whilst ensuring quality developments appropriate to their locations, which do not compromise amenity or environmental quality. In this context, it is considered that the proposed bands are appropriate. As previously noted, however, this does not preclude proposals outside of the proposed band on a site-by-site basis where a developer can justify the provision of a higher density.
<b>Density concerns</b>	
Town cramming should be defined with reference to density.	The term 'town cramming' is referenced in regional policy and a broad definition is provided within paragraph 6.137 of the SPPS. However, Development Control Advice Note (DCAN) 8: Housing in Existing Urban Areas provides a fuller definition, referring to it in terms of unsympathetic development being forced into established residential areas, with negative impacts on environmental quality, local character and the privacy of existing residents. The SPPS notes at paragraph 1.14 that the full suite of DCANs will continue to be a material planning consideration following adoption of the Plan Strategy. Subsequent SPG will further reference town cramming.
Risk of overshadowing within existing neighbourhoods.	The proposed density bands set out in draft policy HOU4 have to take account of all other policy requirements, including those relating to design quality. Criteria b) of draft Policy RD1 requires that new residential development will not affect the privacy or amenity of neighbouring residents, including issues of overshadowing and dominance. Further guidance as to how potentially competing policy requirements should be balanced in design terms will be provided through subsequent SPG.

## Council response to key issues raised

Main Issue	Council Response
Higher density forms of development will become the norm rather than conventional family dwellings and will often be out of character with surrounding development.	The need for an appropriate balance between density and local character, environmental quality and amenity is referenced within the SPPS. As above, proposed densities therefore need to be balanced with all other policy requirements, including Policy HOU6 requiring an appropriate mix in terms of size and type of housing and Policy RD1 requiring conformity with the character of established residential areas. Further guidance as to how potentially competing policy requirements should be balanced in design terms will be provided through subsequent SPG.
<b>Policy Exemptions</b>	
Suggested exemption from policy requirements for major regeneration/masterplan sites including those with a waterfront location.	Rather than an exemption from the requirements of HOU4, major regeneration sites are likely to be dealt with at the LPP stage through the use of detailed KSRs. This is likely to outline specific density requirements which take account of all site opportunities and constraints.
<b>Amenity/open space</b>	
Need to emphasise the importance of adequate quality open space in high density locations.	Creative and innovative design solutions are available to enable the delivery of adequate open space as a part of high density development. Alongside Policy HOU4 there are also a range of wider policy requirements relating to open space and amenity. These include the requirement for appropriate open space within all new residential development through Policy RD1 and the need for residential development of 25 or more units or on sites of 1 hectare or more to provide public open space as an integral part of the development. Policy OS1 also applies a presumption against the loss of existing open space. High density proposals will therefore be assessed on their merits in accordance with all of these policies. Further guidance in relation to the provision of open space as an integral part of new residential developments will also be provided through subsequent SPG.
Policy should facilitate relaxation of garden sizes to achieve quality higher densities.	The majority of higher density developments are likely to consist of apartments that do not have private gardens, but rather areas of communal open space or private balconies. As above, draft Policy RD1

## Council response to key issues raised

Main Issue	Council Response
	<p>on new residential development refers to the provision of appropriate open space. Draft Policy OS3 facilitates an exception to the provision of public open space for apartment developments where a reasonable level of private communal open space is being provided. Further guidance in relation to the provision of open space as an integral part of new residential developments will also be provided through subsequent SPG.</p>
<b>Mixed use development</b>	
<p>The policy should be adjusted to cater for mixed use developments</p>	<p>The Council acknowledge the opportunities presented by appropriately located mixed-use development to enable higher residential densities. It is considered that the specifics of any future mixed use scheme can be appropriately assessed taking the relevant density band from Policy HOU4 into account for the residential elements. Further guidance in relation to this issues will be addressed through the subsequent SPG on density.</p>
<b>Parking</b>	
<p>The policy should make reference to modifying parking standards to permit the achievement of quality higher densities.</p>	<p>The general thrust of draft policies TRAN8 and TRAN9 is to ensure that parking provision does not incentivise the use of the car over the use of sustainable transport modes. They refer to areas of parking restraint and to reduced levels of parking provision in certain circumstances, both of which offer flexibility to consider the reduction in parking standards that could assist in maximising densities where appropriate to do so. Please see summary of response to Policies TRAN8 and TRAN9 for more detail in relation to this.</p>
<b>Evidence base</b>	
<p>Additional evidence is needed to show that the densities proposed are realistic/achievable, help to meet the levels of growth set out in Policies SP1/HOU1 and are compatible with other policies.</p>	<p>As already outlined above, the proposed density bands were informed by a robust evidence base using a three-tiered approach to the analysis of existing and proposed residential development in the city. The policy allows flexibility to consider proposals outside of the proposed bands on a site-by-site basis where a developer can justify the provision of a higher density. As already noted above, it is important to strike a suitable balance between meeting housing needs whilst ensuring quality developments</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>appropriate to their locations, which do not compromise amenity or environmental quality. The Council are therefore content that the proposed bands are appropriate.</p> <p>In relation to compatibility with other policies, all policies in the Plan were subject to sustainability appraisal, with account also taken of cumulative and synergistic effects with other plan policies. It is evident throughout this work that the continuation of low density development that relies on high levels of car use within a city that is already congested is not a sustainable or desirable approach. The application of the density policy instead seeks to maximise the use of existing infrastructure and services, minimising the need to travel and building a more sustainable city for the future.</p>
<p>The density bands prescribe a density inconsistent with the planning context and the already approved and completed developments in Titanic Quarter, along the East Bank.</p>	<p>As noted above, the proposed density bands were informed by a robust evidence base using a three-tiered approach to the analysis of existing and proposed residential development in the city. The policy allows flexibility to consider proposals outside of the proposed bands on a site-by-site basis where a developer can justify the provision of a higher density.</p> <p>It is possible that concerns over a lack of compatibility with residential densities and extant approvals may stem from the way in which densities are calculated in the case of mixed-use development. Further guidance in relation to this issue will be addressed through the subsequent SPG on density. See also comments on 'Mixed-use development' above.</p> <p>Many of the areas referenced in the responses are locations that have already been subject to detailed master planning, through for example the TQ Development Framework, Queen's Quay Masterplan and the East Bank Development Strategy. As outlined above, detailed, site-specific guidance could be provided through KSRs as part of the subsequent LPP.</p>

## Council response to key issues raised

Main Issue	Council Response
<b>Miscellaneous issues</b>	
<p><b>Monitoring</b></p> <p>Need clear mechanisms for monitoring and to take corrective action if infrastructure not provided.</p>	<p>Appendix F of the dPS outlines the Council's intention to monitor draft Plan Strategy policies. For HOU4, the Council will monitor average densities actually delivered within each character area as part of the housing monitor. Where the average densities fall outside of broad density bands, this will trigger the need to review the operation of the policy and take corrective action as necessary. However, the Council recognise that the assessment of average densities will only ever provide an indicator of how effectively the policy is working to help achieve the more sustainable and high quality urban fabric desired.</p> <p>In respect of infrastructure, this and all other relevant factors operate within the context of a plan led system where the primacy of the Plan Strategy is enshrined in legislation. It is therefore vital that all stakeholders in the process work together to realise the aspirations of the Plan as enshrined in the Belfast Agenda. Where infrastructure becomes a restraint on development, this will become apparent through the routine monitoring of plan objectives, such as a slowing in the delivery of new residential development in accordance with growth ambitions.</p>
<p><b>Wider policy requirements</b></p> <p>The main policy wording needs to include <i>'planning permission will be subject to meeting all other policy requirements'</i> to make it more effective and consistent with paragraph 3.9 of the SPPS</p>	<p>Paragraph 3.9 of the SPPS refers to a precautionary approach in a situation where a policy such as HOU4's requirement for higher densities could result in significant environmental damage. In such circumstances, wider policies such as Policy NH1 – protection of natural heritage assets – would also have to be considered alongside the provisions of Policy HOU4. The existing policy wording already refers to the need to 'meeting all other policy requirements', many of which have been referenced above.</p>

## Policy HOU5 – Affordable housing

### Summary of Responses

36 respondents provided comments in relation to policy HOU5, equating to almost 1/3 of all respondents to the Draft Plan Strategy. This was the highest response rate to any of the policies in the draft Plan Strategy.

Of the comments made, 25% of respondents (10) were broadly **supportive** of the policy. Although supportive, some respondents still had caveats, i.e. they were supportive of the policy intent, but had some concerns around implementation and the suitable alternatives to be used.

In summary, the other comments submitted included:

- Concerns over the **20% proportion** of units to be provided as affordable housing on residential sites meeting the size threshold. Comments raised included comparison of this figure to the affordable need identified in the NIHE's Housing Market Analysis, the need for greater flexibility, including potential discounts to or exemption from the requirement and the concern that the proportion will work against housing delivery;
- Comments on the **site size threshold**, with the majority of respondents suggesting the 5 or more units and/or 0.1ha or more threshold is too low and not backed up by evidence, as well as the need for policy review post-Brexit in the context of viability;
- Suggestions that the proposed threshold approach is contrary to **regional policy**, primarily the SPPS, which advocates a locational approach through use of zonings and Key Site Requirements (KSRs), and that no evidence has been presented to justify a departure from this. It was recommended that Policy HOU5 be deleted and that affordable housing should instead be dealt with at the LPP stage;
- Reference to the **definition** of affordable housing, citing the need to increase the supply of good quality affordable accommodation, for eligible households only, and to ensure affordability of units in perpetuity. It was also noted that any change to the definition would need the approval of two ministers;
- A number of respondents suggested different approaches should be used to that set out in HOU5. **Alternative approaches** included a more targeted approach based on need using KSR, more flexibility through the use of bands based on increasing scheme size and consideration of site type;
- Reference to **viability** issues arising from the requirements of HOU5. The general consensus was that the requirements would be too onerous on small developers, taking account of increasing development costs, the current housing market and the potential impacts of Brexit, resulting in housing development being unviable. Conversely, however, it was suggested that the viability argument could be used by developers to avoid having to provide affordable housing within their developments;
- More than half of respondents (20) commented on the policy's reference to '**suitable alternatives**'. The issues of concern centred on the application of the policy on a

## Council response to key issues raised

blanket basis and the lack of evidence and delivery mechanisms around the 'suitable alternatives'. In respect of the suitable alternatives themselves, these included discounts on the number of affordable units required, complete exemptions for certain developments and allowing the payment of commuted sums;

- The need for **flexibility** in the policy, to deal with changing circumstances, to accommodate new/different products and to adapt to site specifics.
- More than 60% of respondents to this policy (22) highlighted issues in relation to **delivery and implementation** mechanisms that would be required. The comments made can be summed up under two general issues – the role of Housing Associations (HAs) and the use of section 76 agreements;
- Concerns regarding the **local housing market** and the potential for affordable housing requirements to cause a shortfall in provision, market housing prices to increase and land values to increase. Reference was also made to the mismatch between land availability and need and the failure to consider societal and political divisions;
- Linked to this, the need for clear mechanisms for **monitoring/review** of the policy;
- Comments on the issue of **tenure mix and design**, including the importance of good tenure mix and design for building sustainable communities, alongside the need for flexibility in terms of the mix of homes to be purchased by HAs from a developer. In relation to the tenure blind approach, it was suggested that the Council should consider a softer approach, where pepper-potting is a preference rather than a stipulation. It was also noted that private developers and HAs currently build to different design standards, with an opportunity to amend the space standards for all housing; and
- A number of respondents commented on the **Sustainability Appraisal** of the dPS, with the majority outlining that a series of reasonable alternatives to draft policy HOU5 need to be identified. Others commented on a specific objective within the SA relating to the viability of schemes of 5-10 units.

A number of respondents questioned the soundness of the **evidence base** in relation to:

- How the policy can deal with areas that have no social housing need;
- Reliance on the outdated DSD Three Dragons report (Dec 2015) and the need for the Council to produce its own evidence. It was suggested that the 2015 DSD report is not reflective of the current values/costs or difficulties in the local housing market, nor the current mechanisms for affordable housing delivery in NI;
- The lack of evidence on the market impact of the proposed policy on viability;
- The application of policy to Build to Rent (BTR) and the wider private rented sector (PRS) and the use of alternative affordable housing products;
- Evidence required for the intermediate housing requirements on sites; and
- Lack of evidence on engagement with neighbouring authorities and potential for different affordable rates in different jurisdictions.



## Council response to key issues raised

## Responses received

Reference	Respondent
<a href="#">DPS-A-HS-6</a>	PG Ltd
<a href="#">DPS-B-AF-J</a>	Galgorm Group
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade & Commerce
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus Healthcare Developments
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-A-6N-F</a>	Braidwater Ltd.
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-A-QE-1</a>	Chartered Institute of Housing
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-AN-T</a>	Clyde Shanks Ltd
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-8V-S</a>	Co-Ownership Housing
<a href="#">DPS-B-U8-R</a>	Declan Hill
<a href="#">DPS-B-8K-E</a>	Department for Communities
<a href="#">DPS-A-1G-3</a>	Individual
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited

Reference	Respondent
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-A-6A-2</a>	Latner 10
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations (NIFHA)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-A-QK-7</a>	DR Mitchell Ltd
<a href="#">DPS-B-8R-N</a>	Organisation
<a href="#">DPS-A-1R-E</a>	Organisation
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-8G-A</a>	Queen's University Belfast
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-Q9-N</a>	Total Architecture
<a href="#">DPS-A-QN-A</a>	West Belfast Partnership Board
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Broadly supportive of the policy, although some respondents still had caveats, i.e. supportive of the policy intent, but with some concerns around implementation and the suitable alternatives to be used.	The Council welcomes the support for draft policy HOU5. There is a critical need for affordable housing, as determined by the NIHE in their Housing Market Analysis /Housing Needs Assessment (HNA), and

## Council response to key issues raised

Main Issue	Council Response
	<p>the LDP, as acknowledged in the SPPS, will be the primary vehicle to help meet this identified need for affordable housing. Matters of concern are addressed under the relevant theme headings below.</p>
<p><b>Proportion of affordable housing</b></p>	
<p>The proportion of affordable housing is too high and will prohibit the development of sites for housing, working against the delivery of the required number of new homes by 2035.</p> <p>It is suggested that there is a lack of evidence to justify 20% and that the proportion should therefore be reduced to 10%.</p>	<p>The Housing Market Analysis (Sept 2017), produced by NIHE to inform the LDP, outlines the need for over 1,500 units of affordable housing per year. This would equate to around 75% of the total proposed housing growth (31,600), giving an imperative to require the highest possible affordable housing provision. 20% is the maximum considered viable in the DSD Three Dragons report. A lower proportion of affordable housing is unnecessary given the flexibility to consider suitable alternatives where viability may be an issue.</p>
<p>The proposal to increase the minimum 20% requirement where viable and necessary undermines the proportion set – if this is to be retained, the opposite situation should also be applied, i.e. where there is no demonstrable need, there should be no affordable requirement.</p>	<p>At Local Policies Plan (LPP) stage, the Council considers it appropriate and necessary to reserve the right to adjust the affordable requirement upwards where this is deemed to be viable through the use of KSR on larger, strategic sites. The policy makes provision for the opposite of this, whereby suitable alternatives, which may include reducing the affordable housing requirement, may be considered where viability is marginal. Further guidance in relation to this will be provided through Supplementary Planning Guidance (SPG) on Affordable Housing, which is proposed within Appendix E of the draft Plan Strategy. Separate SPG may also be prepared specifically addressing how the issue of viability will be considered as part of the planning process.</p> <p>Currently, the draft policy advises that the mix of affordable housing will have regard</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>to demand / prevailing housing need. Despite social housing need not existing in all areas of Belfast, intermediate housing demand exists right across the city. Therefore there will remain a need for affordable housing in all areas of the District.</p>
<p>The clause should not use terms like "minimum" as it will take certainty for developers to help the council satisfy its ambitious plans.</p>	<p>The inclusion of a policy requiring a proportion of housing to be provided as affordable housing is intended to provide greater certainty for developers and is set at a level that offers the best balance between viability and need. As noted above, there is scope within the policy for the proportion to be higher or lower depending on individual site circumstances. To require exactly 20% would remove this flexibility, and could for example prevent 100% affordable housing developments being brought forward in areas with acute affordable housing need. Nevertheless, the scale of affordable housing need in the district suggests that 20% should be considered a minimum.</p>
<p><b>Site size threshold</b></p>	
<p>The proposed threshold is too low and will work against housing delivery / impact on viability of development. No evidence is presented to justify how the threshold was determined. Recommendations for revised threshold included apply to sites of 50+ units and 0.5ha and above.</p>	<p>Given that the level of affordable housing need in Belfast is such that the provision should be maximised as far as possible, the Council are content that the proposed threshold offers the best balance between addressing need without reducing deliverability. The DSD Three Dragons report advised that 5 units was a "realistic starting point" and that this would lessen the impact on small businesses when compared with application in all cases. A higher threshold (for example 10 units or more) would also remove a significant number of schemes from the affordable housing requirements, due to Belfast's land supply being characterised by small sites.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>The adopted Plan will also be subject to annual monitoring and necessary remedial action taken should it become clear that affordable housing provision is more than 10% above/below target. The Council will also formally review the Plan as a whole every 5 years in line with statutory requirements.</p>
<p>The NIHE Housing Market Analysis refers to the need for larger scale developments to deliver mixed tenure, mixed income communities, in order to avoid large concentrations of social housing, deprivation and social inequality. This would suggest a conflict with the low site size threshold proposed in the draft Plan Strategy.</p>	<p>The NIHE Housing Market Analysis rightly notes the importance of larger schemes being mixed tenure, to avoid the creation of mono-tenure estates. This remains valid, notwithstanding the level of threshold applied to the policy. This does not preclude the provision of smaller numbers of social housing in smaller schemes, which by definition avoid the creation of large, mono-tenure estates. As noted above, the threshold proposed in HOU5 has taken account of the land supply profile in Belfast and a higher threshold would remove a large number of sites from the affordable housing requirement.</p>
<p>Figures should be reviewed after 5 years when the impacts of Brexit are more certain, viability evidence can be updated and the success of the policy and its impacts on overall housebuilding can be assessed.</p>	<p>The adopted Plan will be subject to annual monitoring and necessary remedial action taken should it become clear that affordable housing provision is more than 10% above/below target.</p>
<p>Caution should be taken in setting a threshold approach as it will need to be reflective of the different affordable products. For example social housing is not needed in all locations and therefore policies requiring both social and intermediate housing to be provided on each site should be avoided.</p>	<p>The wording of draft policy HOU5 refers to the provision of social rented housing <i>and/or</i> intermediate housing, implying that the requirement could involve social housing, intermediate housing or a mix of both. While site-specific zonings on their own would be inflexible, the Council, in addition to the requirements of HOU5, may seek to apply KSR to certain strategic sites, thereby affording the opportunity to boost social housing supply in areas where there is significant housing need. This will be considered as part of the LPP.</p>

## Council response to key issues raised

Main Issue	Council Response
<b>Regional policy</b>	
<p>The proposed threshold approach is contrary to the SPPS, which advocates a locational approach through the use of zonings and KSR. The Council have provided no evidence to justify a departure from this approach.</p>	<p>The Council considers that draft policy HOU5 is in line with the SPPS and has been founded on robust evidence that outlines significant affordable housing need throughout Belfast. In the policy justification, the use of KSR within the LPP is referenced, in the context of certain viable developments providing higher than the minimum requirement of affordable housing, necessary due to the acute level of need. However, with the significant need that exists, together with the issue of access to land, it is considered that KSR on zoned land on its own would be insufficient. A threshold approach as proposed would be more flexible to respond to changes in need over time and would also capture provision through windfall sites. Full consideration of these alternatives is outlined within the Sustainability Appraisal.</p>
<b>Definition</b>	
<p>It is acknowledged that the definition of affordable housing might be amended to better suit current and foreseeable housing demands and increase the supply of suitable housing, however it is noted that any change to the current definition will likely require approval of two Ministers – Communities and Infrastructure.</p>	<p>The current definition for affordable housing is set out within the SPPS and is therefore beyond the scope of the plan to update. However, it is noted that the definition of intermediate housing may change over time and the policy justification fully acknowledges this, stating that <i>'where this is the case, such additional products will be considered suitable to help meet the affordable housing obligations of this policy in the future'</i>.</p> <p>The Council also consulted extensively with key stakeholders during the process, including DfC, who at the time of drafting the Plan Strategy were working on a revised definition of affordable housing and were actively piloting additional intermediate products. DfC have since</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>launched a 12 week consultation on the 'Definition of Affordable Housing' from 24 June to 13 September, which seeks to move towards a broader "non-product based definition" whilst recognising the "clear potential to broaden the focus for intermediate housing". This broadly aligns with the approach outlined within the draft Plan Strategy.</p> <p>However, as noted, any formal changes to the definition is beyond the scope of the LDP and will require Ministerial approval and potentially amendment to the SPPS to ensure broader alignment of the planning definition. The policy as currently drafted nevertheless provides the broadest definition possible whilst maintaining alignment with the current regional policy framework, but should remain flexible enough to adapt as and when the new regional definition is finalised.</p>
<p>Any change to the definition to include the following criteria:</p> <ul style="list-style-type: none"> <li>• The affordable housing is delivered by a registered housing association;</li> <li>• The affordable housing is allocated by a housing association to eligible households who cannot access market housing; and</li> <li>• The affordable housing units should remain at an affordable price for future eligible households or if these restrictions are lifted, the subsidy shall be recycled for alternative affordable housing provision.</li> </ul>	<p>As noted above, the definition of affordable housing lies outside the remit of the LDP. DfC are currently consulting on the 'Definition of Affordable Housing' from 24 June to 13 September 2019. When finalised, we would expect to address a number of the issues raised.</p> <p>Confirmation of the range of products that meet an updated regional definition of affordable housing for consideration in relation to this policy will be addressed through proposed affordable housing SPG, which will be updated as necessary to ensure alignment with any changes made as a result of the changing definition and DfC guidance during the lifetime of the plan.</p>
<p>Policy goal should be to increase the supply of good quality, suitable affordable homes and include products like Rent to Own.</p>	<p>Increasing the supply of good quality, suitable affordable homes is one of the strategic objectives within the 'Shaping a</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>liveable place' section of the draft Plan Strategy.</p> <p>The justification and amplification text for Policy HOU5 acknowledges that the shared ownership product has been expanded to include 'Rent to Own', which is currently at pilot stage and which is likely to be facilitated in any revised definition.</p> <p>As noted above, DfC are currently consulting on the 'Definition of Affordable Housing' from 24 June to 13 September, which seeks to move towards a broader "non-product based definition" whilst recognising the "clear potential to broaden the focus for intermediate housing". This broadly aligns with the approach outlined within the draft Plan Strategy. The range of products that meet any revised definition lies outside the remit of the LDP. Nevertheless the policy is written to ensure flexibility over the plan period as new products are developed.</p>
<p>How can the policy guarantee that dwellings remain affordable in perpetuity?</p>	<p>Whilst planning has an important role in helping to contribute to the challenges of affordability, it has statutory limitations in respect of future property costs and financial issues around tenure. The retention of affordable dwellings in perpetuity is inextricably linked to the delivery mechanisms for affordable housing provision.</p> <p>For example, social housing provided by a registered provider is still subject to the right to buy, meaning there is no guarantee that a social rented home will remain as such throughout its lifetime. Similarly, the Council note that many intermediate housing products require the ability to staircase to full ownership, again</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>potentially limiting the opportunity for retention in perpetuity.</p> <p>Therefore, the Council will work closely with statutory partners, including DfC and NIHE, to explore mechanisms which would allow for the retention of affordable housing in perpetuity where possible. This forms a key consideration in the current DfC consultation on the 'Definition of Affordable Housing', which recognises the need to retain affordable housing that is funded by Government or provision made for the repayment or recycling of public subsidy where this may not be the case. This specific aspect could be further expanded in subsequent SPG in the light of the pending DfC consultation's outcomes.</p>
<p><b>Alternative approaches</b></p>	
<p>A phased introduction/approach to affordable housing:</p> <ul style="list-style-type: none"> <li>• 1 to 20 units Nil</li> <li>• 21 to 50 units 10%</li> <li>• 51 to 250 units 15%</li> <li>• 250 plus units 20%</li> </ul>	<p>Such a phased approach to affordable housing provision would not be compatible in the Belfast context, given that a significant percentage of the city's land supply is made of small sites (with less than 10 unit capacity). This would drastically cut the amount of affordable housing delivered which is obviously not favoured given the acute need that exists.</p> <p>However, the Council recognises that there will need to be a period of adjustment to allow the market to adjust to the new policy requirements. With this in mind, the Council are continuing to assess the likely market impact of the emerging housing policies alongside potential incentives and measures to stimulate the different residential sectors.</p> <p>As part of this, research completed by Colliers International notes that Co-ownership intermediate housing has been vital to suburban development in recent</p>



## Council response to key issues raised

Main Issue	Council Response
	<p>times, providing certainty for developers on a certain percentage of dwellings in a scheme being 'sold' at the outset.</p> <p>The policy also has flexibility built in through the reference to suitable alternatives where it is accepted that it is unviable to meet the affordable housing requirements in full. This is most likely to be the case while the policy is in its infancy, but the Council expect that land transactions should adjust over time to take account of new planning obligations and their consequential impact on viability.</p>
<p>The policy should differentiate between site types (greenfield, brownfield, etc.) using a banding system as in York or between variations in land values as in Leeds. A less stringent policy approach as in Manchester could also encourage provision of affordable housing in new residential developments.</p>	<p>The Council recognises the many complex issues that come into consideration in the purchase and sale of sites, the construction of housing and the sale of completed developments. However, there is a desire to avoid an approach that becomes too intricate or too heavily caveated. That is why the Council has structured HOU5 to allow for circumstances where demonstrated viability issues necessitate an alternative approach to a development, recognising that all cases are different.</p> <p>As noted above, the policy has inbuilt flexibility through consideration of suitable alternatives where it is demonstrated that viability is a valid concern, which doesn't preclude the outcomes achieved through these examples from elsewhere. Viability appraisals will therefore necessarily consider any abnormal costs of development, such as remediation associated with certain brownfield land, land values in a locality and or sale values in different areas of the city, etc.</p> <p>Further guidance in relation to this will be provided through SPG on Affordable</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Housing, which is proposed see Appendix E of the draft Plan Strategy. Separate SPG may also be prepared specifically addressing the processes and key assumptions to be used by the Council when viability is identified as an issue.</p>
<p>Opportunities need to be identified where, for example, social housing need coincides with 'non-specific' open space, there should be a presumption in favour of development – not exploring this is contrary to the RDS and the SPPS.</p>	<p>The Council considers that this issue has been catered for under draft Policy OS1, which includes the caveat that an exception to the policy presumption in favour of open space retention should only be appropriate where its redevelopment would bring substantial community benefit outweighing its loss, or where its loss would have no significant detrimental impact (see also SPPS Section 6.205). Facilitating social housing need on certain open space sites could be construed as having a significant community benefit. However, consideration of the suitability of specific sites for residential development will form part subsequent LPP.</p>
<p>Use of KSR through zoning of land at LPP stage, based on identified need only (both social and intermediate), ensuring the right housing is provided at the right locations and enabling a developer to plan costs. This could allow developers to argue for density ranges on zoned lands that enable viable development and could provide a proportion of a site for social/affordable housing, where a need exists in an area.</p>	<p>The SPPS advocates the use of KSR in making provision for affordable housing in LDPs and the Council, in its policy justification, refers to the use of KSR within the subsequent LPP, in the context of developments providing higher than the minimum requirement of affordable housing where viable, and necessary due to an acute level of need.</p> <p>It is not considered that KSR would be used for all affordable provision, as this would be inflexible to respond to changes in need over time. As outlined in the Sustainability Appraisal, a two-pronged approach through the use of a strategic threshold policy within the Plan Strategy alongside KSR at LPP stage, is considered the best option.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Concern that social housing could be subsumed within the broader concept of affordable housing. Social housing is an important category in its own right meeting a distinct need and this should be reflected in the Plan. Suggestion that there must be clear zoning and allocation for social housing, and sites that must provide only social units within the overall mix.</p>	<p>Existing planning precedent from 2013 (see Nelson Street appeal decision - ref 2012/A0079) presents significant difficulties in securing social housing on land specifically zoned for social housing where this is not already in public ownership. Without a policy such as the Policy HOU5, the zoning of land for social housing will not therefore provide any greater access to land and is therefore unlikely to secure the level of affordable housing required.</p> <p>The current policy wording makes it clear that the mix of affordable housing will be based on an up to date analysis of demand and prevailing housing need, which generally refers to social housing need. Given that the level of social housing need annually over the plan period is around 50% higher than intermediate need (940 units versus 630), it is unlikely that intermediate housing will take precedence to the detriment of social housing supply. In fact, as the annual social housing requirement over the plan period is 50% higher than intermediate need, it is likely that some mixed tenure schemes will only include social rented homes alongside market housing.</p>
<p>The affordable housing requirement should be applied on a case by case basis.</p>	<p>It is considered that the best course of action, as indicated by the evidence base and through the Sustainability Appraisal of the Plan, is to stipulate an appropriate % requirement as a baseline (20%) and then deal with any viability issues arising on a case by case basis. This provides greater certainty for developers when considering land acquisition and development feasibility.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>All planning applications are assessed on their individual merits. The policy enables this through the reference to suitable alternatives where it is accepted that it is unviable to meet the affordable housing requirements in full.</p>
<p><b>Viability</b></p>	
<p>HOU5 needs to provide evidence on the economic impact and deliverability of the proposed policy. Viability concerns cited include:</p> <ul style="list-style-type: none"> <li>• Reference to increasing development costs;</li> <li>• Unknown effects of Brexit;</li> <li>• Housebuilders still managing land banks bought at a peak of the market are building out to minimise a loss;</li> <li>• Precarious state of the NI housing market; and</li> <li>• High proportion of small house builders in NI compared to other jurisdictions.</li> </ul>	<p>The SPPS clearly sets out the requirement for local authorities to make provision for affordable housing where it is required. The NIHE Housing Market Analysis has clearly outlined the significant affordable need for both social rented and intermediate housing. This necessitates an approach which maximises the levels of affordable housing provided within viability constraints.</p> <p>The threshold proposed in HOU5 has taken account of the majority of Belfast’s land supply which consists of small sites. An increase in the threshold to, for example, 10 units and above, would remove a large number of sites from the affordable housing requirement. The DSD Three Dragons report advised that 5 units was a “realistic starting point” and that this would lessen the impact on small businesses when compared with application in all cases.</p> <p>The LDP is only one element in a complex dynamic and the Council are continuing to assess the likely market impact of the emerging housing policies alongside potential incentives and measures to stimulate the different residential sectors. This will involve primary market research with the development industry and partnership with other stakeholders to encourage developments that deliver the ambitions for the city.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>In light of the comments received, the Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination. Further guidance in relation to the implementation of this policy will be provided through SPG on Affordable Housing, which is proposed within Appendix E of the draft Plan Strategy. This SPG will also provide additional information on the suitable alternatives that can be considered should viability issues be demonstrated. Separate SPG may also be prepared specifically addressing the processes and key assumptions to be used by the Council when viability is identified as an issue. For more details, please also see comments provided below under <i>evidence base</i>.</p>
<p>Strong viability evidence needed to avoid delays in agreements and housing supply through unrealistic affordable housing requirements. A more precautionary approach is advised in the initial 5 years of the Plan in order to protect economic growth, rather than operating a monitoring system that may be required to remediate damage caused by the policy.</p>	<p>As noted above, the Council are committed to the provision of further guidance in relation to the implementation of this policy by way of Affordable Housing SPG. This will be based on additional research and evidence and will provide additional information on flexibility offered within the policy in terms of the suitable alternatives that can be considered should viability issues be demonstrated. See also section of 'evidence base' below.</p>
<p>The Housing Market Analysis notes that the number of new dwelling starts in 2015 and 2016 was less than the number of completions, suggesting '<i>completion rates may fall in the future</i>'. Therefore, it is deemed necessary that the Local Development Plan aids construction as far as possible, not only to promote economic sustainability but also to assist in delivering social sustainability objectives.</p>	<p>The provision of affordable housing has the potential to aid construction by providing certainty for developers on a certain percentage of dwellings in a scheme being 'sold' at the outset. This will both serve to reduce the risk of development and to enable options for cross-subsidy of housing.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>As noted above, the Council are continuing to assess the likely market impact of the emerging housing policies alongside potential incentives and measures to stimulate the different residential sectors. To date, this has included primary market research completed by Colliers International, which indicates that Co-ownership intermediate housing has been vital to suburban development in recent times precisely for the reasons outlined above.<sup>1</sup></p> <p>As with all policies within the draft Plan Strategy, the Sustainability Appraisal of options was based on assessment of 19 strategic objectives across social, economic and environmental considerations, to derive a balanced outcome on preferred options. A LDP that actively seeks to secure affordable housing across the city through mixed tenure developments is considered to provide the best balance between economic and social sustainability.</p>
<p>Recommendation for an agreed viability approach on a site by site basis to determine the affordable housing requirements – this approach should be defined before the Plan is adopted, together with mechanisms for review and how viability decisions can be challenged. It was noted that experience of viability appraisals in England presents difficulties in what is considered a ‘competitive returns’ (quoted in National Planning Policy Framework (NPPF)) for developers, with ‘positive returns’ proposed instead.</p>	<p>The DSD Three Dragons report references a 15% developer return, however it notes that during consultation, it was suggested that profitability can vary during the build process and that viability can be determined across multiple schemes in a developer’s portfolio. In relation to details on level of developer return, it is not considered the remit of the Plan at this stage to explore the complexities of this matter, other than to acknowledge the issue of viability exists and to provide for alternatives where relevant.</p>

<sup>1</sup> See ‘Report to Belfast City Council’s Development Planning and Policy Unit to consider the impact of its proposed housing policies (as set out Belfast Local Development Plan Draft Plan Strategy) on the residential property market located within the planning area’, April 2019, Colliers International

## Council response to key issues raised

Main Issue	Council Response
	As noted above, further guidance in relation to the consideration of viability in determining planning applications will be provided through SPG on Affordable Housing and Viability. This will specifically address the processes and key assumptions to be used by the Council when viability is identified as an issue, and will acknowledge the need for a developer to make a reasonable return while at the same time recognising the social value of contributions.
Concerns raised that in its current form, the policy may require the majority to prepare and submit viability reports, which would put significant strain on local authority resources.	The resourcing of the Council to process planning applications is not considered a relevant issue in the context of Plan soundness. Nevertheless, the Council are committed to delivering an effective planning application process through adequate resourcing.
Evidence from both London and Dublin indicates that high levels of social provision on private schemes reduces the delivery of both social and private housing.	Belfast-specific research completed by DfC and NIFHA in June 2018 entitled 'Mainstreaming Mixed Tenure in Northern Ireland' notes a "perception that social housing could negatively impact the demand for, and sales price of, new homes", but finds instead that "Mixed-tenure offers the possibility of making housing development more viable". Key to minimising any negative implications associated with social housing is ensuring good design quality in all housing and operating a tenure-blind approach as promoted through this policy.
<b>Suitable alternatives</b>	
A number of suggestions were made in relation to what should be considered a suitable alternative, including: <ul style="list-style-type: none"> <li>• A reduction in the proportion of affordable housing;</li> <li>• A financial contribution to an affordable housing development elsewhere in the district; and</li> </ul>	As noted above, the Council intended to produce SPG which will provide more clarity on the delivery mechanisms to achieve affordable housing, the issue of viability, together with detail on the range of suitable alternatives. The examples provided within the justification and amplification text are illustrative and not

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>An exemption from the policy.</li> </ul>	<p>intended to provide an exhaustive list. In reality, the Council are likely to develop a hierarchy of preference in terms of suitable alternatives as part of the SPG, with a primary focus on securing access to land and maximising mixed tenure development.</p> <p>NIHE, who are the local housing authority, note within their representation that the primary purpose of the policy is to provide access to the land, which raises concerns regarding the use of alternative sites or commuted sums. Their preference would therefore be a reduction in the proportion of affordable units required on the site. However, the use of an alternative mix of affordable units and intermediate products available may be preferable.</p>
<p>Concern that “affordable housing on a suitable alternative site” or “a reduction in the number of affordable homes” may be used as an excuse for developers not to incorporate affordable housing within their development.</p>	<p>The Council welcomes these comments, recognising the significant affordable housing need that exists and the importance of providing these units within mixed tenure developments throughout the city. As noted above, full consideration of all suitable alternatives will be addressed in subsequent SPG.</p>
<p>There are numerous other affordable housing products that could become available and as such policies should be flexible enough to respond to other products.</p>	<p>The Council, in formulating draft policy HOU5, has carefully considered its longevity and flexibility, given that the Local Development Plan will operate over a 15 year period. It is fully aligned with the SPPS, noting that the definition of intermediate housing may change over time. The policy justification fully acknowledges this, stating that <i>‘where this is the case, such additional products will be considered suitable to help meet the affordable housing obligations of this policy in the future’</i>.</p>



## Council response to key issues raised

Main Issue	Council Response
	<p>The Council also consulted extensively with key stakeholders during the process, including DfC, who at the time of drafting the Plan Strategy were working on a revised definition of affordable housing and were actively piloting additional intermediate products. DfC have since launched a 12 week consultation on the 'Definition of Affordable Housing' from 24 June to 13 September, which seeks to move towards a broader "non-product based definition" whilst recognising the "clear potential to broaden the focus for intermediate housing". This broadly aligns with the approach outlined within the draft Plan Strategy.</p> <p>The policy as currently drafted provides the broadest definition possible whilst maintaining alignment with the current regional policy framework, but should remain flexible enough to adapt as and when the new regional definition is finalised.</p>
<p>Consideration should be given to discounting the amount of social housing provision required for residential schemes that utilise vacant/derelict buildings – justified by the high development costs associated with this type of development.</p>	<p>Although it is acknowledged that works to protected or architecturally sensitive buildings can incur higher development / redevelopment costs, it is not considered appropriate at this stage to include a policy caveat that applies a blanket discount on the affordable housing required for this type of development. The existing references to sustainability or viability issues and that suitable alternatives will be considered on a case by case basis are considered adequate to ensure flexibility for such developments.</p>
<b>Flexibility</b>	
<p>The policy is not reasonably flexible to deal with changing circumstances (e.g. Brexit), as it does not allow for an exemption from the requirements.</p>	<p>HOU5 outlines that suitable alternatives will be considered on a case-by-case basis where viability concerns are apparent. Given the acute affordable housing need that exists in Belfast, along with the</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>significant population and growth targets, it is likely that an exemption from the policy requirements would be a last resort, reserved for exceptional circumstances. As already noted above, SPG to be prepared will establish a clear preferential order in which suitable alternatives should be considered where viability is demonstrated to be an issue.</p>
<p>Policy wording should be flexible particularly in relation to the delivery of different affordable housing products.</p>	<p>As noted above, the policy justification notes that where the definition of affordable housing (specifically intermediate housing) is expanded to include other products, these will be considered suitable to meet the affordable housing obligations of HOU5. The Council have also consulted extensively with key stakeholders during the process and the policy as currently drafted provides the broadest definition possible whilst maintaining alignment with the current regional policy framework, but should remain flexible enough to adapt as and when the new regional definition is finalised.</p> <p>Since drafting the Plan Strategy, DfC have launched a 12 week consultation on the 'Definition of Affordable Housing' from 24 June to 13 September, which seeks to move towards a broader "non-product based definition" whilst recognising the "clear potential to broaden the focus for intermediate housing". This broadly aligns with the approach outlined within the draft Plan Strategy.</p>
<p>The policy needs flexibility, as the location of social housing need cannot be determined across a 15 year plan period as those in need of social housing can change their locational preference at any time. Site specific zonings for affordable housing</p>	<p>The draft policy is clear in stating that affordable housing mix will have regard to an up to date analysis of demand, including housing stress and prevailing housing need. While acknowledging that waiting lists are fluid, the Council have a</p>

## Council response to key issues raised

Main Issue	Council Response
<p>would therefore not be flexible enough to provide for changes in need over time. Instead, the type of affordable provision should be provided based on the need in the location at the time.</p>	<p>statutory duty to prepare a local development plan and the SPPS advises that the development plan process will be the primary vehicle to facilitate any identified need for affordable housing. In this regard, Policy HOU5 has been informed by the most up to date evidence available at the time – the NIHE’s Housing Market Analysis (Sept 2017) which outlined the geographic social housing need over the period 2017-2032. The approach proposed is considered sufficiently flexible through the use of both a threshold approach and KSR on certain sites at the LPP stage.</p>
<p><b>Delivery &amp; Implementation</b></p>	
<p><i>The role of Housing Associations</i></p>	
<p>The policy is not reflective of the mechanisms for affordable housing provision in NI. Private developers are not able to provide social housing in the absence of DfC regulation, so have to rely on Housing Associations (HAs) for delivery. A revised policy must therefore:</p> <ul style="list-style-type: none"> <li>• Insist on legally binding design and build contracts between private developers and housing associations; and</li> <li>• Provide mechanisms and opportunities for partnerships between the private development sector and HAs.</li> </ul>	<p>The policy justification refers to the preparation of SPG which, amongst other things, will <i>‘provide advice in relation to the models available to deliver affordable housing...’</i> However, it must be remembered that the LDP process, which is a statutory requirement, can only facilitate the provision of affordable housing through requiring a proportion of a site to be used for this purpose or through zoning / KSR.</p> <p>The Council are therefore already working in partnership with DfC and NIHE and other relevant stakeholders to ensure that delivery mechanisms are adapted to reflect the emerging policy approach. This includes detailed discussions regarding the current and future processes required for the effective implementation of the policy.</p>
<p>In other jurisdictions, policies specifically reference the provision of a percentage land contribution, after which the affordable housing provider purchases the bricks and mortar on the associated land. This</p>	<p>The approach referenced here is one of the potential delivery mechanisms available for the implementation of the policy. Similar to a post construction sale model, it can provide clarity as stated, but also enable</p>

## Council response to key issues raised

Main Issue	Council Response
<p>approach maximises clarity for developers as they can factor the cost into negotiations with land owners while the relevant homes represent a pre-sale which can give funders confidence.</p>	<p>cross-subsidy of the remainder of the site, as the affordable element would be fully funded. Again, as noted above, the SPG will aim to provide more detail and ensure that the mechanisms needed for such an option would be put in place.</p>
<p><i>Section 76 Planning Agreements / developer contributions</i></p>	
<p>Section 76 Planning Agreements considered cumbersome and time-consuming, it was suggested that agreements need to be in a standard form, with maximum time limits set to ensure processing in a timely manner. Other issues suggested that S76 Planning Agreements should cover include tenure mix, layout and design, timing of the development and key attributes (including financial security, value for money, adaptive &amp; sustainable), etc.</p>	<p>The detail of Section 76 Planning Agreements is an issue which lies outside the remit of the Plan Strategy. The Council's recent Developer Contributions Framework begins to address some of these issues on the basis of existing policy, but will need to be updated as the new policies are implemented. As noted above, these issues are also likely to form part of the issues covered under the proposed Affordable Housing SPG.</p>
<p>Suggestion that the Council remove reference to S76 Planning Agreements and instead deal with these matters by planning condition.</p>	<p>Given the complexities surrounding the delivery of a proportion of affordable housing as part of mixed-use developments, it is unlikely that all of the issues can be addressed through the use of planning conditions alone. As set out in draft Policy HOU5, it is more likely that affordable housing will have to be secured by way of Section 76 Planning Agreement, which will need to be in place in advance of planning permission being granted.</p>
<p>Affordable housing contributions should not be considered in isolation from contributions for other aspects, such as infrastructure provision.</p>	<p>As is currently the case, the full range of developer contributions will be taken into account when considering the impact of such contributions on the viability of development.</p>
<p>One respondent suggested that the developer contributions consultation should have been aligned with the LDP consultation as both are intrinsically linked.</p>	<p>The Council's recent consultation on the Draft Developer Contributions Framework sought to gauge views on the use of developer contributions as a planning tool used to mitigate or manage the impacts of new development. It was based on existing policy provision and therefore is not reflective of the changes that will be</p>

## Council response to key issues raised

Main Issue	Council Response
	implemented as a result of the draft Plan Strategy. However, where seeking views from similar groups of stakeholders, the two consultation exercises were aligned wherever possible.
A statement be included that a future plan review could lead to the requirement for developer contributions for affordable housing.	As noted above, access to land is one of the primary issues with the provision of affordable housing, particularly social housing. The provision of affordable housing on-site as part of mixed tenure developments is therefore preferable to the payment of commuted sums for off-site provision. The Council are likely to develop a hierarchy of preference in terms of suitable alternatives as part of the Affordable Housing SPG, with a primary focus on securing access to land and maximising mixed tenure development.
<b>Local housing market</b>	
Policy HOU5 may discourage housing development, by increasing the cost of private housing and impacting upon land values, exacerbating the shortfall.	<p>The SPPS requires the Council to make provision for affordable housing to facilitate any need identified by the NIHE. The LDP is the primary vehicle for this. For Belfast, the need is acute and draft Policy HOU5 is considered necessary to assist in meeting this need.</p> <p>However, as noted above, the Council recognises that there will need to be a period of adjustment to allow the market to respond to the new policy requirements. As noted above, the Council are continuing to assess the likely market impact of the emerging housing policies alongside potential incentives and measures to stimulate the different residential sectors. This will involve primary market research with the development industry and partnership with other stakeholders to encourage developments that deliver the ambitions for the city.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Initial market research suggests that rather than discourage development, the policy may ultimately stimulate development by enabling cross-subsidy and providing security through guaranteed sales at an early stage. For example, if any social housing element of a scheme is fully grant funded, with a suitable return for developers included, there should be no direct effect on the price of market housing.</p>
<p>The policy needs to be informed by up-to-date information and evidence on local markets, including housing need, in order to achieve, through negotiation, the right mix between social rented homes and co-ownership housing in developments.</p>	<p>The draft policy is considered to be clear in reinforcing the need for an appropriate mix of social rented and intermediate housing on sites which shall be based on up-to-date need (the NIHE produce an annual Housing Needs Assessment to address social housing requirements). The local market, in the context of the acute affordable housing need that exists, is the main reason for having such a policy in the Plan. The Council acknowledge the importance of implementation and have committed to the production of SPG to outline delivery mechanisms in more detail. As noted above, the Council are also working with a range of key stakeholders, including NIHE and DfC, to review delivery practices and processes.</p>
<p>While the Council acknowledges that areas identified as being in highest need of social housing are areas where land is in short supply, it fails to consider the intricacies of the housing markets within Belfast and the impact on the delivery of social housing. For example, it is unlikely that it would be possible to meet the social housing need in all areas of the city due to religious and political divisions.</p>	<p>The location of land for housing and its relationship with social housing need will be considered in detail as part of the subsequent LPP process. Whilst Belfast has a range of challenges associated with single identity areas of social housing, this does not preclude the need for an affordable housing policy that seeks to maximise provision. Policies SP4 and CGR1, alongside the pursuit of mixed tenure, tenure blind housing developments are all intended to help proactively address some of these challenges. However, the Council</p>

## Council response to key issues raised

Main Issue	Council Response
	acknowledge the need for collaboration with all stakeholders in respect of delivering affordable housing where it is needed. As outlined within Section 11 of the draft Plan Strategy, the provision of affordable housing will be subject to regular monitoring during the plan period and any necessary adjustments made to ensure effective delivery.
The Plan does not address the housing crisis and fails to show the vision of the Belfast Agenda.	One of the biggest issues concerning housing in Belfast is the lack of provision of affordable accommodation. Policy HOU5 is trying to proactively address this by facilitating the development of affordable homes (social and intermediate) so that everyone who needs an affordable home can access one. This is in full alignment with the ambition of the Belfast Agenda. That said, it is important to recognise that the Council cannot deliver the objectives of the LDP alone. This is particularly true in the context of Belfast, where many of the key functions required to deliver physical development, such as regeneration powers, housing strategy, transport and infrastructure etc. lie outside the remit of the Council. In its community planning role, the Council will maximise opportunities for partnership working in terms of resourcing, delivery and shared learning.
<b>Monitoring/Review</b>	
There need to be clear mechanisms for monitoring/reviewing policy implementation and for challenging the numbers.	The Council have outlined in Appendix F of the dPS the intention to monitor the delivery of affordable housing, with a trigger for action if delivery is more than 10% above or below the 20% target. Such an action may include a plan review, which is also a statutory requirement on a 5 yearly basis.

## Council response to key issues raised

Main Issue	Council Response
	<p>In relation to the challenge to figures, the draft policy has recognised that sustainability or viability issues might arise in certain cases, with 'suitable alternatives' on a case-by-case basis. This provides an opportunity for developers to challenge the affordable housing requirements in instances where meeting requirements in full may impact a scheme's viability. As noted above, further details on this process will be contained within subsequent Affordable Housing SPG.</p>
<p><b>Tenure mix and design</b></p>	
<p>NIHE will determine the mix in terms of tenure (social/ intermediate) and size of affordable housing required. However, it is noted that annual Housing Need Assessments (HNAs) prepared by the NIHE only consider social housing need, not intermediate.</p>	<p>The justification and amplification for Policy HOU5 acknowledge the roll of NIHE and housing associations in advising on the appropriate mix of affordable housing required in each case (see 7.1.34). This includes both social and intermediate housing.</p> <p>It is accepted that the NIHE's annual HNA only addresses social housing need, including those in housing stress, but the broader Housing Market Analysis undertaken periodically by NIHE provide a broader assessment of intermediate housing need over the longer term.</p> <p>In addition, the Council have commissioned specific research as part of the Housing Growth Options Report and Addendum on the Size and Type of Housing Needed to provide additional evidence on the mix of housing associated with the preferred growth scenario. This has been reflected with policy HOU6: Housing Mix and will form an important part of the monitoring process for both policies over the Plan Period.</p>



## Council response to key issues raised

Main Issue	Council Response
<p>Mixed tenure development is considered vital in the interest of sustainable communities and should be linked to need in the area. However, there should be flexibility for Housing Associations in terms of the final mix of units that they purchase from the developer.</p>	<p>As noted above, the mix of affordable units required on a site specific basis (both tenure and size) will be determined by NIHE in accordance with prevailing housing need in that area. In some cases, the level of need may necessitate that all affordable units on a site are social rented. It is considered that this issue would be dealt with at an early stage, i.e. through pre-application discussions.</p>
<p>A number of respondents discussed the merits of clustering affordable housing units versus pepper-potting. Concerns included potential for different design standards/specifications and management issues. Recent DfC/NIFHA think piece on mixed tenure developments suggests 'pepper potting' should be a preferred approach, rather than a prescribed requirement in every case.</p>	<p>The Council agree that full pepper-potting may not be appropriate in all cases. The use of the word 'should' in relation to the provision of affordable housing as an integral part of mixed tenure development, integrated with general needs housing, provides a degree of flexibility where this may not be feasible. For example, the policy justification acknowledges that, for apartment buildings, in the interest of efficient future management arrangements, some clustering of units may be appropriate. Details as to how this aspect of the policy will be applied in practice, alongside other design considerations will provide within the proposed SPG.</p>
<p>It is important that the homes for shared ownership and social housing should be provided to a sufficient standard i.e. they should not have a lesser specification than the market housing.</p>	<p>The DfC are currently working on revised space standards for social rented housing, however it is noted that in many cases, the specifications of social rented housing already exceed that of market homes. The Council, in draft policy HOU7, are proposing increased standards for all new housing, aligned to some of the Lifetime Homes criteria. Draft policy HOU5 has also been worded to recognise the importance of tenure blind mixed tenure development, i.e. that the affordable homes are '<i>not readily distinguishable in terms of external design, materials and finishes</i>'.</p>
<p>The draft policy has missed the opportunity to improve social housing space standards</p>	<p>This issue is more appropriately dealt with under draft policy RD1, which directly</p>

## Council response to key issues raised

Main Issue	Council Response
<p>or recommend DfC emerging draft standards</p>	<p>references the space standards in Appendix C of the draft Plan Strategy.</p>
<p><b>Evidence base</b></p>	
<p>How has the evidence base considered areas where there is no identified need?</p>	<p>Notwithstanding the significant numbers of those in housing stress, it is acknowledged that social housing need does not exist in all areas of Belfast. However this draft policy seeks to provide affordable housing – which is both social rented and intermediate housing. Despite social housing need not existing in all areas of Belfast, intermediate housing demand exists right across the city. Therefore there will remain a need for affordable housing in all areas of the District.</p>
<p>There were a number of concerns raised in relation to the DSD Three Dragons report referenced as part of the evidence base , including:</p> <ul style="list-style-type: none"> <li>• It is out of date;</li> <li>• Its findings on viability testing have not been taken into consideration, with further evidence now required to assess if the policy is viable;</li> <li>• Assumptions do not include any 1-bed flats in the proposed market housing mix;</li> <li>• A developer return of 15% is not considered sufficient;</li> <li>• There appears to be no account taken of contingency costs or significant upfront costs, such as contamination mitigation;</li> <li>• Modelling is on a static basis (i.e. costs and income are assumed to occur at a single point in time);</li> <li>• Testing doesn't account for larger schemes or those incorporating tall buildings;</li> <li>• Assumes a difference in minimum Gross Internal Areas for each tenure, which does not accord with the principle of 'tenure blind' development.</li> </ul>	<p>It is acknowledged that the report by DSD with specialist input from Three Dragons and Heriot-Watt University was prepared at a point in time, despite the dynamic nature of the local housing market. It is also acknowledged that the assumptions used within the research including the size of units, tenure mix, density, etc. were not tailored specifically to Belfast's current context. However, the report did acknowledge that changing economic circumstances (namely an increase in market values) would make the viability of an affordable housing contribution in Belfast more certain. In this context, and bearing in mind that house prices have risen since 2015, up-to-date data is unlikely to have a significant impact on the report's findings.</p> <p>As noted above, the policy has inbuilt flexibility through consideration of suitable alternatives where it is demonstrated that viability is a valid concern. Viability appraisals will therefore necessarily consider any abnormal costs of development, such as contamination</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>mitigation, as well as up to date land values and sale prices in different areas of the city, etc.</p> <p>Further guidance in relation to this will be provided through Supplementary Planning Guidance (SPG) on Affordable Housing, which is proposed within Appendix E of the draft Plan Strategy. Separate SPG may also be prepared specifically addressing the processes and key assumptions to be used by the Council when viability is identified as an issue. If required, this may be informed by additional research to identify the appropriate assumptions to be included within any approach to viability, including acceptable developer returns, contingency/abnormal costs, design standards, etc. Please also see following comments on additional viability research.</p> <p>As noted within Appendix F, the Council will closely monitor the delivery of affordable housing throughout the Plan period and consider remedial steps should the 10% trigger be reached.</p>
<p>The Council should undertake its own assessment of viability in order to ascertain policy effectiveness, operational implications and the cumulative impact of policies on the delivery of housing numbers. This should include a sample sites across housing market sectors, high level feasibility appraisals, coherence with other policies (appropriate mix, densities, design standards), taking account of other potential developer contributions, and strategic viability, etc.</p>	<p>The policy approach is supported by a robust evidence base which underlies the entire Plan and has been compiled to ensure Plan soundness. It was also analysed within the Sustainability Appraisal, along with other reasonable alternatives and was determined to be the most appropriate course of action to meet plan objectives.</p> <p>Nevertheless, the Council are continuing to assess the likely market impact of emerging housing policies through primary market research with the development industry and partnership with other stakeholders to encourage developments</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>that deliver the ambitions for the city. As part of this, research completed by Colliers International notes that despite some geographical sensitivities, “there is no overriding impediment to the draft policies set out in the dPS contributing to the supply of affordable housing in Belfast.”<sup>2</sup></p> <p>As noted above, additional research may be undertaken to inform subsequent SPG on affordable housing and/or viability to help establish an agreed approach to viability testing. This may include a high level, strategic assessment of viability in different locations across the City.</p> <p>As already referenced above, the Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination.</p>
<p>Whilst the NIHE’s Housing Market Analysis identifies areas where affordability is an issue for the sales and rental market, it does not consider the levels of requirement needed but has been cited in the justification for the proportion employed</p>	<p>The NIHE Housing Market Analysis forms part of the evidence underpinning the 20% proportion, along with the DSD Three Dragons report. Whilst it does not directly advise on an appropriate percentage, it does detail the level of affordable housing need – 940 social dwellings and 630 intermediate dwellings annually over the Plan period. This significant need is considered in the context of the potential percentage considered viable in the DSD Three Dragons report. As 20% is the maximum they consider as possible in the Belfast context (i.e. 10-20%) this upper figure is considered necessary to service the identified need.</p>
<p>Further evidence is required in relation to the development of different affordable</p>	<p>As already noted, the Council intends to produce SPG on affordable housing, which</p>

<sup>2</sup> See ‘Report to Belfast City Council’s Development Planning and Policy Unit to consider the impact of its proposed housing policies (as set out Belfast Local Development Plan Draft Plan Strategy) on the residential property market located within the planning area’, April 2019, Colliers International

## Council response to key issues raised

Main Issue	Council Response
<p>housing products (equity loans, affordable rent, discount market sale housing, rent to own, etc.) and how they can be applied to different models of housing delivery (e.g. Build to Rent (BTR)/Private Rented Sector). It is noted that whole area of affordability has many spheres and each should be further developed and guidance produced. It is also noted that intermediate housing is based on individual choices for purchasers and is not catalogued in any housing association list.</p>	<p>will provide additional clarity on the delivery mechanisms.</p> <p>DfC are currently consulting on a revised 'Definition of Affordable Housing' for intermediate housing, which seeks to move towards a broader "non-product based definition" whilst recognising the "clear potential to broaden the focus for intermediate housing". This specifically references 'Rent to Buy' or 'Rent to Own', 'Shared Equity' housing, 'Discounted market sales' housing and affordable rent products, such as 'Mid-market Rent' as potential products that may be available to meet the revised affordable housing definition in the future. This broadly aligns with the approach outlined within the draft Plan Strategy.</p> <p>This revised definition, once adopted, and the proposed SPG should therefore facilitate new intermediate housing products, many of which are already available in other jurisdictions. The additional guidance produced will address many of these concerns, including the application in BTR schemes. The DfC consultation, for example, specifically notes that affordable rent products are likely to be "particularly well suited to Build to Rent Schemes"</p> <p>As noted above, the broad requirement for intermediate housing is evidenced within NIHE'S Housing Market Analysis, which identifies a need for 633 intermediate units per year in Belfast. It also notes that there is considerable scope for this market to be increased as finance for full home ownership continues to be constrained by mortgage lenders.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>As noted above, the Council are continuing to assess the likely market impact of emerging housing policies through primary market research with the development industry and partnership with other stakeholders to encourage developments that deliver the ambitions for the city. The Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination.</p>
<p>There is also no evidence of engagement with neighbouring authorities in terms of comparative policy requirements for affordable housing, and the impact this may have on demand across the wider housing market area.</p>	<p>The Council recognises that the local housing market extends well beyond the boundary of Belfast. A Metropolitan Area Spatial Working Group (MASWG) was established by Belfast City Council to provide a forum for cross-boundary issues to be discussed along with the LDP development process. Consisting of both officers and politicians from the neighbouring councils, along with DfI and other statutory representatives, a series of MASWG meetings have taken place to date, which has included discussions on the emerging approach to affordable housing in each District. However, it is important to emphasise that it is not the function of the group to reach any joint agreement on shared approaches across multiple districts, such as ensuring uniformity in the policy approach to affordable housing.</p>
<p>The precautionary approach outlined within the NIHE Housing Market Analysis with regard to predictions and forecasts, should also be applied to affordable housing policy.</p>	<p>It is not clear how the 'precautionary' approach suggested should be applied to this policy as such wording is normally associated with potential effects on environmentally sensitive receptors. However, the respondent may mean that caution should be taken when considering strategic viability evidence, or that the market impact may be lessened through a</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>phased introduction of such policy. Draft policy HOU5 has been informed by a robust evidence base and addresses the SPPS need to make provision for affordable housing need. The acute need in Belfast is such that what has been proposed is considered a necessary intervention.</p> <p>As noted above, the Council are committed to the provision of further guidance in relation to the implementation of this policy by way of Affordable Housing SPG. This will be based on additional research and evidence and will provide additional information on flexibility offered within the policy in terms of the suitable alternatives that can be considered should viability issues be demonstrated.</p>
<b>Sustainability Appraisal</b>	
<p>Concerns were raised in relation to the sustainability appraisal, specifically:</p> <ul style="list-style-type: none"> <li>• The lack of consideration of reasonable alternatives to HOU5; and</li> <li>• Reference to a specific comment in the SA relating to the viability of an affordable requirement on schemes of 5-10 units.</li> </ul>	<p>Detailed response included within summary of SA responses.</p>
<b>Miscellaneous issues</b>	
<p><b>Land Supply</b></p> <p>Reference to the supply of land and its allocation to meet local demand for housing as being paramount in increasing the number of people living in the city. Also recognises the importance of windfall, protecting existing residential accommodation, avoiding cramming and ensuring new housing development includes community infrastructure and local amenities</p>	<p>The Council recognises that access to land has been one of the main issues in the failure to deliver the levels of required affordable homes to date. This is the main reason why draft policy HOU5 is needed. The Council considers that the use of thresholds plus having the option of KSR for specific sites at the LPP stage, is the best option, both to maximise the delivery of affordable housing and to achieve sustainable, mixed tenure communities.</p>
<p><b>Engagement</b></p> <p>There is a need for wider consultation with the housing industry.</p>	<p>In the first instance, the Council would refer to its Statement of Community Involvement, which was a statutory</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>requirement at the start of the plan process. Aside from the mandatory public consultation periods for the POP and DPS, a number of housing workshops were held with key stakeholders throughout the process to date. Attendees included the NIHE, DfC, representatives from HIFHA and a number of housing associations and the Federation of Master Builders. Further engagement with all key stakeholders will also be undertaken in due course as part of the preparation of the proposed Affordable Housing SPG.</p>
<p><b>Homelessness</b> The Plan Strategy makes the assumption that homelessness is covered through social housing need assessment. It would be preferable to make specific mention of this issue, e.g. after HOU5 in the amplification</p>	<p>The Council acknowledges that the issue of homelessness is of critical importance and would note the NIHE Homelessness Strategy 2017-2022, which the Council was consulted on. Homelessness is catered for within the NIHE's Housing Needs Assessment, with applicants in housing stress on the Common Waiting List who are currently homeless dealt with as a priority. Homelessness is therefore adequately addressed by the proposed approach to affordable housing in Policy HOU5.</p>
<p><b>Supported living</b> As for 5 unit / 20% affordable housing thresholds, there should be a similar provision to manage and measure how supportive living accommodation is provided.</p>	<p>Part of the Council's evidence base includes the NIHE's September Housing Market Analysis update (Sept 2017). In respect of supported housing, it states that no new schemes were planned for Belfast at the time of writing. It also alludes to the '<i>rigorous commissioning process with partners</i>' in relation to the provision of such accommodation. The Council considers that any future need for such schemes can be facilitated on a case-by-case basis, and that it would be unnecessary to establish a threshold system for this type of provision.</p>



## Policy HOU6 – Housing mix

### Summary of Responses

23 respondents provided comments in relation to policy HOU6. Of the comments made, 36% of respondents (8) were broadly **supportive** of the policy. The comments made also included a number of general concerns, along with a series of suggested amendments, including the deletion of HOU6. The comments submitted can be summarised as follows:

- Queries to the **flexibility** of Policy HOU6 in terms of its application across tenures and on a site-by-site basis, how it can react to changes in locational and/or social housing need and the requirement for a variation in unit size in single apartment developments;
- A range of comment were provided in relation to **deliverability**, focussing on market demands and developers being allowed to deliver homes that people want to buy, how the policy aligns with the Council's ambition for more homes, how sites already purchased and/or partially developed will be treated and the operation of an active stock management approach;
- There is a lack of evidence on the **viability** implications of HOU6 in terms of financial risk and economic impact and the viability of larger units in the city centre, together with the structural and infrastructure costs associated with many home types, in the context of apartment block developments;
- Comments relating to **tenure mix** and linkages with draft Policy **HOU5 on affordable housing**;
- Comments highlighting **design considerations** associated with housing mix, including the process for establishing the appropriate mix, consideration of the character of the local area and consistency with broader housing residential design policies; and
- Concerns regarding the provision of **family housing**, particularly in a high density, city centre development context.

The soundness of the **evidence base** was also queried by a number of respondents, citing the following issues:

- There is no evidence of how design need is assessed and why private market need is to be displaced;
- Evidence is required to demonstrate there is a market for larger units in Belfast;
- The need set out in the NIHE Housing Market Analysis is specific to social housing and doesn't provide any justification for the type of houses private developers build; and
- There is no detail of how the mix of house types required is applied on a site-by-site basis, when and on what evidence base.

### Responses received

Reference	Respondent
<a href="#">DPS-A-HS-6</a>	Agent
<a href="#">DPS-B-AF-J</a>	Agent

Reference	Respondent
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited

## Council response to key issues raised

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus Healthcare Developments
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-AN-T</a>	Clyde Shanks Ltd
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-A-QZ-P</a>	Individual

Reference	Respondent
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations (NIFHA)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-6J-B</a>	Organisation
<a href="#">DPS-B-8E-8</a>	Organisation
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-Q9-N</a>	Total Architecture
<a href="#">DPS-A-QN-A</a>	West Belfast Partnership Board

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Broad support for the policy with reference to the promotion of choice, creation of balanced communities and alignment with the SPPS.	Support for the proposed policy approach is welcomed.
<b>Flexibility</b>	
Reference to the ' <i>Size and Type of Housing Needed</i> ' Study, which states in particular that policy shouldn't be applied on a site by site basis. Flexibility is needed to respond to local market context, viability issues, demand and prevailing housing need.	Policy HOU6 has been prepared to reinforce the need to promote choice and assist in meeting community needs. It provides flexibility in that the exact mix of house types and sizes will be negotiated "on a case by case basis", which allows any developer concerns to be addressed at that stage. This should provide sufficient flexibility in the application of the policy. The specific reference in the policy to the need for smaller homes across all tenures stems from demographic evidence of an ageing population and the undersupply of accommodation over the plan period to cater for the forecast reduction in

## Council response to key issues raised

Main Issue	Council Response
	household size. Further guidance in relation to this issue can be provided through the proposed Supplementary Planning guidance (SPG) on Housing Mix noted in Appendix E.
Requirement to vary unit sizes in single apartment developments does not provide flexibility. For example, where these are part of mixed-use schemes or where local housing need has changed housing mix should be developer's choice. Suggestion that policy be amended so that a mix of sizes in apartments is only required where demand is identified.	The requirement to vary unit sizes within single apartment developments is a way to introduce variety in the interests of creating balanced and sustainable communities. Where a mix of unit types may not be viable, sufficient flexibility exists for this to be taken into account. The evidence base highlights the need for both larger family housing and smaller units and to omit larger schemes containing apartments could significantly reduce the number of units where a suitable mix of house types and sizes are provided. Such an outcome would reduce choice and work against the Council's objective to grow the population. As noted above, further guidance can be provided through subsequent SPG.
<b>Deliverability</b>	
Need to take account of market demands and consequential impact on deliverability. No attempt appears made to analyse the private housing market currently, with a view to achieving the goal for additional homes in the city. There is also a lack of detail on how this policy would be applied to sites already purchased and/or partially developed.	The predicted demographic trends, the need for more compact urban forms to realise the city's growth aspirations and the direction set by regional policy and good practice means that a one size fits all approach will not meet the long term housing needs of the city. It is therefore necessary to include a strategic policy to ensure that future housing stock is diverse enough to provide for the city's full range of housing needs. The Council recognise that there may be a transitional period during which the market will adjust to new policy requirements. However, this approach of encouraging a broader mix of housing is neither new nor unique to Belfast.

## Council response to key issues raised

Main Issue	Council Response
	<p>In addition to the evidence developed on housing mix, the council have commissioned primary market research with the development industry to try and predict the potential market impact of the emerging LDP housing policies on development in different areas of the City. In the light of the comments received, the Council will keep the evidence base relating to housing growth under review and will provide updates as appropriate as part of the independent examination.</p> <p>As noted already, the policy allows for the exact mix of house types and sizes to be negotiated on a case by case basis, subject to a number of criteria, allowing for 'local adjustments'. This is considered sufficient to enable future developer concerns on individual sites to be addressed.</p> <p>See also subsequent section on Viability.</p>
<p>Without a clearer definition of what housing mix entails and how it can be achieved, there will be challenges and contention.</p>	<p>As already outlined above, the Council intend to prepare SPG in relation to housing mix. This SPG will seek to provide clarification on the successful delivery of housing mix and will provide a basis to inform discussions on a case by case basis.</p>
<p>The NIHE outline that the operation of an active stock management approach will require sufficient house types, form and size to accommodate a variety of household needs across age and health requirements.</p>	<p>The Council recognise the importance of promoting choice to assist in meeting community needs and it is considered that draft Policy HOU6 will facilitate this.</p>
<p><b>Viability</b></p>	
<p>Not clear how viability has been taken into account in formulating HOU6, in terms of financial risk and economic impact. It is suggested that there will be significant increases in the structural and infrastructure costs associated with many home types,</p>	<p>As draft Policy HOU6 only refers to a 'suitable mix' of house types and sizes, it is only when individual schemes are negotiated, with account taken of up to date need, location of site and characteristics of the development, that</p>

## Council response to key issues raised

Main Issue	Council Response
<p>including increasing the mix of apartment types in a development.</p>	<p>the specifics relating to viability can be fully assessed. However, any approach to viability must recognise that construction and infrastructure costs will apply irrespective of the mix of house types and denser forms of development are likely to maximise the use of any such infrastructure investment.</p> <p>As noted in comments on draft Policy HOU5, Viability SPG may be prepared specifically addressing the processes and key assumptions to be used by the Council when viability is identified as an issue. This may be informed by additional research to identify the appropriate assumptions to be included within any approach to viability.</p>
<p>Market demand does not always correlate with prevailing housing need. To be overly prescriptive could have impacts on house prices for products for which there is market demand but limited supply. For example, large units in the city centre are not viable because there is no market demand for the price needed to cover the cost of building larger units.</p>	<p>The Council does not intend to be prescriptive on housing mix on every site – this would be inflexible as the market is dynamic and need changes over time. However, it is the intention to negotiate with developers on a case-by-case basis, where account will be taken of both market demand and prevailing need. Such discussions should avoid the situation arising where demand exists for housing that is in limited supply, as such a scenario would continue to exacerbate existing affordability issues in the city. It is likely that as the growth in city centre living envisaged through the Plan Strategy materialises the resultant market demand will in turn help to address concerns over viability.</p>
<p><b>Linkages with affordable housing policy</b></p>	
<p>The issue of housing type and size should only apply to affordable housing (as defined within the SPPS) and be considered as an integral part of Policy HOU5. Developers will want to deliver market housing bespoke to</p>	<p>The SPPS emphasis on good quality housing offering a variety of house types, sizes and tenures to meet different needs applies to all tenures. This is crucial in the development and retention of balanced</p>

## Council response to key issues raised

Main Issue	Council Response
<p>the housing market area i.e. a product home owners want to buy. Policy HOU6 should be deleted.</p>	<p>and sustainable communities. To only apply the policy to affordable housing approach could eliminate up to 80% of all new housing. There is therefore an imperative for the Plan to seek an appropriate mix of size and type of housing through a specific housing mix policy.</p>
<p>The NIHE's Housing Market Analysis needs to be updated on a defined timeframe and the affordable requirement needs to be defined prior to the issuance of the Plan.</p>	<p>The SPPS states that the NIHE will carry out the Housing Market Analysis, required to inform the LDP. The Council's evidence base therefore includes the most up to date Housing Market Analysis Update (prepared in September 2017) available at the time. In addition to the update provided in 2017, the Council have also had regard to the original 'Belfast Metropolitan Housing Market Area: A Local Housing System Analysis' (NIHE, 2011).</p> <p>The 2017 Housing Markey Analysis update outlined the social housing need for the next 15 years, up to 2032. It also set out the annual intermediate requirement and advised that there was <i>'considerable scope for this market to be increased.'</i></p> <p>The Housing Market Analysis is updated periodically and it is understood that the NIHE are currently working on a revised version to reflect updated housing market areas. In addition, an annual Housing Needs Assessment (HNA) is published by NIHE to identify a rolling 5 year social housing need across the city, which will be taken into account when considering the appropriate mix of housing types and sizes for affordable housing.</p>
<p>Need robust baseline understanding of existing social housing provision in the area,</p>	<p>As noted in paragraph 7.1.43, the housing mix in terms of tenure (social/</p>

## Council response to key issues raised

Main Issue	Council Response
including quality of stock and future social need.	intermediate), size and size of affordable housing required will be determined by NIHE on a case by case basis, in accordance with the latest evidence available. Please also see the summary of responses to draft Policy HOU5, which directly addresses the evidence base underpinning the affordable housing requirement.
Intermediate housing need will be more market driven and is better understood within the local market for sale and private rented markets.	The Council acknowledge that intermediate housing will be 'more market driven' and this aligns with the SPPS, which recognises that the definition of intermediate housing may change over time to incorporate other forms of housing tenure below market rates. There is a clear affordability issue in Belfast and therefore the need to expand the range of intermediate products to maximise choice, including products that are currently available elsewhere, for example affordable rent and discount market sale housing.
The reference in Policy HOU 6 to affordable housing should be removed.	The reference to the affordable housing requirement in HOU6 has been included specifically in relation to single apartment developments. Due to a mix of house types being impossible in such cases, the relevant section of the policy emphasises the need for an appropriate mix in terms of tenure mix and a mix of unit sizes. If this sentence only referred to a mix of sizes, there may be ambiguity in relation to the need for tenure mixing, despite the requirements of Policy HOU5 being applicable regardless (assuming the relevant thresholds are met).
The threshold contained within the policy (as for Affordable Housing) is considered very low at 0.1 ha or 5 units and is not evidence based.	The rationale for the threshold and proportion used is addressed more fully under the summary of responses to draft Policy HOU5. Application of the same threshold through Policy HOU6 will help

## Council response to key issues raised

Main Issue	Council Response
	<p>ensure consistency and aligns with Belfast's land supply being characterised by small sites.</p> <p>As outlined in Section 11 and Appendix F of the draft Plan Strategy, the Council will closely monitor the delivery of this policy throughout the Plan period and will consider remedial steps in line with statutory requirements should the identified triggers be reached.</p>
<p>The policy should recognise the potential impact of '<i>peer pressure</i>' on being the person/family in the affordable homes.</p>	<p>The delivery of affordable housing as part of mixed tenure development is addressed within the summary of response on draft Policy HOU5 (affordable housing). Within that policy, the emphasis is placed on mixed tenure development and the principle of 'tenure blind' development, both of which should assist in lessening any pressures experienced on being the affordable home residents within a development.</p>
<p><b>Design considerations</b></p>	
<p>There should be clarity about who decides and assesses the design need (mix) for a site, how they make those decisions and on what basis. It needs to be in the area plan for each site and should be clear that there is a right of challenge to the assessment</p>	<p>Whilst key site requirements (KSR) relating to the mix of units requirement may apply to larger sites at Local Policies Plan (LPP) stage, it is unlikely that the mix of units would be prescribed for most sites. Instead, the policy provides flexibility in that the exact mix of house types and sizes to be negotiated "on a case by case basis", which allows any developer concerns to be addressed at that stage. As noted above, further guidance in relation to this issue can be provided through the proposed SPG on Housing Mix.</p>
<p>Consideration that the character of the local area may also be a factor in the determination of an appropriate housing mix.</p>	<p>The Council agree that the character of the surrounding area will also be an important consideration. The 'location' of a site and 'specific characteristics' of a development within Policy HOU6</p>



## Council response to key issues raised

Main Issue	Council Response
	therefore imply the need to consider surrounding character. However, this issue is also addressed in further detail within residential design Policy RD1 (criterion a)), which will also be a material consideration in any planning applications for future housing. It is therefore not necessary to reference this overtly within Policy HOU6.
It has not been demonstrated that the policy is coherent with other proposed residential and design policies.	The Council, in preparing the DPS, carefully considered the relationship of proposed policies with each other and are content that this policy offers no conflict with any other policies within the draft Plan Strategy. Comments in relation to linkages with Policy HOU5 specifically are addressed above.
<b>Family housing</b>	
Family housing forms a significant percentage of the proposed mix but the LDP doesn't demonstrate this, e.g. in terms of the densities proposed (Policy HOU4) & allocations in the city centre / harbour estate etc.	<p>The '<i>Size and Type of Housing Needed</i> Study prepared to inform the Plan Strategy concludes that families will continue to account for a reduced, but sizeable proportion of the city's households by the end of the plan period. However, it notes the trend towards smaller household sizes overall and an increase in lone parent households and concludes that "meeting the needs of families will therefore likely require a balanced profile of housing development in Belfast over the plan period."</p> <p>Monitoring data indicates that over half of all new homes completed in Belfast in recent years have been flats and the aspiration for population growth and higher density development are likely to continue this trend. Nevertheless, the Council are content that ample land is available in the District for the delivery of a suitable mix of house types and sizes required over the plan period.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>The plan fails to enforce a mix of housing sizes for single apartment developments since such housing developments are most likely to occur in the city centre, it will be difficult to provide a proper housing mix here.</p>	<p>As noted above, the Council are content that ample land is available within the district as a whole for the delivery of the full range of housing required over the plan period. Policy HOU6 clearly outlines the need for a suitable mix of house types and sizes to be provided in new developments, but recognises that the mix will need to be monitored at a district level, rather than prescribed on a site by site basis.</p> <p>The Council recognise the difficulties associated with achieving different unit types within single apartment developments. However, the draft policy is clear in stating that “in such cases, the housing mix will be considered acceptable through greater variety in the size of units.” Creative and innovative design solutions are available to enable the delivery of a range of housing options, including housing for families, within higher density development. The inclusion of larger 3 bed flats, for example, within new city centre developments, particularly where these are affordable homes, could encourage larger households, including families to move there.</p>
<p>Homes within certain parts of the city may be more desirable to certain occupants due to the amenities that are located nearby.</p>	<p>The Council recognise that support services and amenities available in the surrounding area (or lack of) will form a large part of the decision for a household whether or not to move to an area to live. To help account for this, the criterion within Policy HOU6 ensure that the broad location of the site will be taken into account in negotiations with developers on the housing mix for individual schemes. The Council will also make provisions where appropriate and</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>necessary for supporting infrastructure and services as part of the subsequent LPP process.</p>
<b>Evidence base</b>	
<p>No evidence in plan documents outlining why the policy should be applied to all housing development regardless of tenure.</p>	<p>Following completion of the Housing Growth Options Report (Belfast City Population &amp; Housing Growth Study), the Council commissioned further research to ascertain the future need for different sizes and types of housing over the plan period, as well as establishing the specific needs of different groups within the housing market. This Study is referenced in the policy justification and is the source of the suggested city-wide figures for housing mix over the plan period. It notes a historic supply of small apartments within the City and recommends a policy that isn't overly prescriptive but rather aims to ensure a "supportive framework" to ensure the delivery of the size and type of housing needed over the Plan period.</p> <p>As noted in the policy justification, the inclusion of Policy HOU6 is also consistent with the SPPS which references the key regional objective of balanced communities, specifically that: '...good quality housing offering a variety of house types, sizes and tenures to meet different needs.....is fundamental to the building of more balanced communities'.</p>
<p>The need set out in the NIHE Housing Needs Assessment is specific to social housing and doesn't provide any justification for the type of houses private developers build.</p>	<p>While the Housing Market Analysis does outline the social housing need for Belfast, it is an important document also providing significant information on the owner occupied market and the private rented sector. As noted above, the NIHE revise their Housing Market Analysis periodically and the Council's evidence base therefore includes the most up to</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>date Housing Market Analysis Update (prepared in September 2017) available at the time.</p> <p>Alongside this, as noted above, the Council also commissioned research to ascertain the future need for different sizes and types of housing associated with the proposed growth scenario over the plan period, as well as establishing the specific needs of different groups within the housing market. This Study is referenced in the policy justification and is the source of the suggested city-wide figures for housing mix over the plan period.</p>
<p>Up to date analysis of housing need must include Housing Stress/Homelessness as well as the need for private dwellings.</p>	<p>The NIHE's HNA and Housing Market Analysis detail the need for social housing provision, which is housing available to households in housing need, allocated in accordance with the common selection scheme, prioritising those households living in unsuitable or insecure accommodation. This includes all those deemed to be in housing stress and/or homeless.</p>
<p>No timeframe is given as to how, when and on what evidence basis 'local adjustments' are made and agreed.</p>	<p>As outlined above in section on flexibility, Policy HOU6 provides flexibility in that the exact mix of house types and sizes will be negotiated "on a case by case basis". As already outlined above, the Council intend to prepare SPG in relation to housing mix, which will help provide clarification on process to agree a suitable mix of housing in a particular case.</p>

## Policy HOU7 – Adaptable and accessible accommodation

### Summary of Responses

10 respondents provided comments in relation to Policy HOU7. Of the comments made, 30% of respondents (3) were broadly **supportive** of the policy. Notwithstanding, a number of concerns were also raised which can be summarised as follows:

- Reference to the differences regarding **Lifetime Homes Standards** between the Preferred Options Paper (POP), which refers to an ‘appropriate proportion’ of homes, and the draft Plan Strategy (DPS), which applies to ‘all sites’;
- Reference to the NIHE Housing Market Analysis and lack of clarity in how the 10% **wheelchair housing** requirement on sites of 10 or more units was arrived at;
- Suggestion that a target of 10% of the 31,600 new homes should be made available for **supported living** accommodation;
- The relationship to **Policy HOU5: Affordable housing** and whether the 10% wheelchair accessibility requirement can be provided within the allocation for social housing;
- Concerns regarding the potential **economic impact** of the policy, with a suggested need for an Economic Impact Assessment to include the design and cost impact of the policy. The appropriateness of a one size fits all overarching policy was also queried, suggesting that developers cater for those house types in demand within the market; and
- A number of respondents questioned the **evidence base** in relation to:
  - The relevance of an English housing survey to the accessibility of existing stock in NI;
  - The justification for application of the policy to private housing; and
  - Justification for some of the relevant standards being transferred into policy, whilst others have been excluded.
- Issues were also raised relating to **flexibility**, comparison to the **English Building Regulations** and the need to allow **active stock management**.

### Responses received

Reference	Respondent
<a href="#">DPS-A-HS-6</a>	Agent
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-A-6N-F</a>	Braidwater Ltd.
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation (CEF)

Reference	Respondent
<a href="#">DPS-A-6A-2</a>	Latner 10
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-1R-E</a>	Organisation
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Broad support of the policy	The Council welcomes the support for draft policy HOU7.
<b>Lifetime Homes</b>	
There is a lack of accessible housing for households who wish to live independently in private sector accommodation.	This issue is noted. With an ageing population, it is considered necessary to adopt a proactive approach towards increased accessibility of housing stock across all tenures. This is supported by the NI Housing Strategy, which outlines the need to "support older and disabled people to live independently if they wish to do so".
The Draft Plan Strategy or Housing Technical Supplement have not justified the divergence from the Preferred Options Paper (POP), which referred to an appropriate proportion of units within strategic housing sites being built to Lifetime Homes standards, whereas the dPS requires all new homes to incorporate accessible criteria a) to f).	<p>The POP (April 2017) had sought to gauge opinion on the principle of a Lifetime Homes policy that would apply to all tenures, noting that social housing already had to comply with these standards. The POP consultation report outlined that 50% of respondents were generally supportive of the approach, with another 39% being non-committal, with many of these citing the need for more detail.</p> <p>The Council committed to additional research on the subject to inform the dPS. Consultation with Building Control confirmed that many of the Lifetime Home standards are already included in Part R of the Building Regulations and additional research found that the Standards cost little extra than building to Part R of the Building Regulations and that the wider social benefits considerably outweigh the minor additional costs.</p> <p>The NIHE Housing Market Analysis Update (sept 2017) confirms this, stating "development of homes to these standards is especially important in the</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>context of an ageing population and can prevent the need for costly and disruptive adaptations whilst providing more suitable accommodation." It also confirms that "any additional cost of delivering Lifetime Homes standard housing is minimal", noting that all social housing is already built to this standard in NI. NISRA statistics published in October 2017 also reinforced the reality of an ageing population – a 3.6% rise in those aged 85 and over was recorded between 2006 and 2016.</p> <p>All of the above factors were taken into account in arriving at criteria a) to f) of draft policy HOU7, which seek to address those elements of the Lifetime Homes standards capable of assessment at planning stage.</p> <p>Given the wider social benefits in comparison to the relatively small additional costs, the principle of accessible homes should be applied to all housing schemes with non-compliance being the exception rather than the norm. This same principle is applied through a range of sustainable design standards (see reference to BREEAM in summary of responses to Policy DES2), with many developers now choosing to implement higher standards voluntarily due to the longer term cost benefits.</p>
<p>Recommendation that the Lifetime Homes requirements be omitted from the policy.</p>	<p>Based on the comments already set out above, it is considered necessary to adopt a proactive approach towards increased accessibility of housing stock across all tenures.</p>
<p><b>Wheelchair housing</b></p>	
<p>It is unclear from NIHE's Housing Market Analysis how the 10% proportion of</p>	<p>NIHE's Housing Market Analysis notes that Belfast's older population is expected to</p>

## Council response to key issues raised

Main Issue	Council Response
<p>wheelchair accessible homes on sites of 10 units or more has been derived.</p>	<p>increase to 17% by 2025, and this along with the health problems associated with old age is likely to lead to increased demand for more accessible properties, including wheelchair housing. The report also notes a recognised shortage of this type of accommodation. They also note that “developing new homes to wheelchair standard is significantly cheaper and more effective than providing adaptations to existing unsuitable properties.”</p> <p>Based on Belfast’s existing land supply (which consists of a significant number of smaller sites) and the levels of growth set out over the plan period, applying a 10% requirement for wheelchair accessible homes on all sites of 10 units or more, would provide sufficient wheelchair accessible units per year to meet identified need (as opposed to 10% of all new developments as suggested in the Housing Market Analysis).</p>
<p><b>Supported living accommodation</b></p>	
<p>10% of new homes should be made available for supported living accommodation.</p>	<p>Unlike affordable housing or wheelchair housing, where a specific need has been identified, the NIHE’s Housing Market Analysis states that no new supported housing schemes were planned for Belfast at the time of writing the report. Moreover, within the public sector, supported housing is generally supplied through a rigorous commissioning process by the relevant public bodies. Any speculative private sector development will also have to demonstrate need. In this context, it is not considered necessary or appropriate to apply a threshold to this type of development in the Plan. Please also see response under ‘Supported living’ in summary of responses to Policy HOU5.</p>



## Council response to key issues raised

Main Issue	Council Response
<p>Although referring to older people and people with limited mobility, other needs within this category should be considered, including emergency accommodation for people fleeing their homes as a result of violence, people in crisis, people receiving floating support, and people in supported living programmes which include those living with addiction</p>	<p>Many of the categories referenced here correspond to those who would be determined to be in housing stress and included on the NIHE's common waiting list, as a priority for social rented housing provision, which is addressed through draft Policy HOU5: Affordable housing. The requirement for specialist forms of accommodation, such as supported living accommodation is addressed under draft Policy HOU8: Specialist Residential Accommodation.</p>
<p><b>Linkage to HOU5</b></p>	
<p>It is unclear how the 10% wheelchair accessible requirements of HOU7 relates to the social housing provision under HOU5 (i.e. the DfC Housing Association Guide (HAG) wheelchair housing requirement)</p>	<p>The wheelchair requirement that applies to social housing schemes is currently 7%, although the draft NI Programme for Government suggests this should be raised to 10%. The NIHE Housing Market Analysis suggests that the number of households requiring wheelchair accessible housing would equate to approximately 12% of our proposed housing growth over the plan period, but concludes that a 10% requirement for all new build housing is the appropriate level.</p> <p>Whilst all proposals for residential development will need to meet the adaptable and accessible homes criteria of draft Policy HOU7 (Criteria a) to f)), it is only schemes of 10 units or more will be required to conform with both Policy HOU5 and Policy HOU7's wheelchair accessible requirements. In such instances, 10% of the overall development will need to be wheelchair accessible, regardless of the tenure mix. Therefore if a greater proportion of affordable housing units are designed to be wheelchair accessible, a lower proportion of the private housing will be required to meet these requirements and vice versa.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>The Council have proposed the production of Supplementary Planning Guidance (SPG) on adaptable and accessible accommodation (see Appendix E of the draft Plan Strategy, which can provide further details in relation to this issue.</p>
<p><b>Economic impact</b></p>	
<p>Concerns regarding a one-size-fits-all overarching requirement and recommendation that an Economic Impact Assessment be undertaken.</p>	<p>As already outlined above, the Lifetime Homes Standards can be included in new build for relatively little additional cost, when compared to expensive adaptations at a later stage, and with significant societal benefits. A high level cost benefit analysis has been widely documented and is summarised within Technical Supplement 02: Housing. This builds upon work published by the NI Housing Council in 2010<sup>1</sup> and Habinteg in October 2015<sup>2</sup>. Greater accessibility in the housing stock is a necessity, with a specifically identified deficit in the private sector and the Council also recognise the implications of an ageing population which will have a significant impact on the design of dwellings. The Council are therefore content that the policy is founded on a robust evidence base.</p>
<p><b>Evidence base</b></p>	
<p>Evidence regarding the accessibility of existing stock is from an English housing survey and therefore not relevant to Northern Ireland.</p>	<p>The reference to the English Housing Survey is a drafting error. The inaccessible nature of the existing housing stock in NI has been confirmed through the NIHE Housing Market Analysis, which notes the inability to readily meet accessible housing demand in owner occupied or</p>

<sup>1</sup> "Why the Private Sector should build to Lifetime Homes Standards: A business case by the Northern Ireland Housing Council", NI Housing Council, 2010.

<sup>2</sup> "7 Points about the new Housing Standards 2015", Habinteg, October 2015. Available from: <https://www.habinteg.org.uk/reports-and-briefings/7-points-about-the-new-housing-standards-2015-779>

## Council response to key issues raised

Main Issue	Council Response
	private rented accommodation. See minor modifications.
Evidence is required to justify why accessible/adaptable homes need to be provided for everyone and that they are wanted by private and affordable home purchasers	<p>As noted in the draft policy justification and amplification, demographic realities coupled with the inaccessibility of much of the existing housing stock, present clear evidence for all housing to meet an accessible and adaptable standard. Pointing to the Plan's growth aspirations, accessible homes are an important consideration in that they facilitate households changing needs over time, and can be lived in and visited by a wide range of people. A recent policy publication by the NI Equality Commission<sup>3</sup> recommended the application of accessible housing standards to all new builds.</p> <p>Whilst such standards do not necessarily mean an individual will stay in the same home throughout their lifetime, they do ensure that the housing stock is more flexible and able to adapt to varying requirements throughout its lifetime. A more accessible and adaptable stock will therefore also support more balanced and sustainable communities, in line with the objectives of the SPPS.</p>
It is unclear why those standards that have not been included in the policy were excluded.	<p>The Lifetime Homes and HAG wheelchair standards that were omitted from the draft policy were excluded for one of two reasons:</p> <ul style="list-style-type: none"> <li>a) They were considered to lie outside the remit of planning control; or</li> <li>b) The requirements were already covered in the existing NI Building Regulations and/or British Standard BS 8300-2:2018</li> </ul>

<sup>3</sup> See *Equality and Housing in Communities, Equality Commission, February 2019*

## Council response to key issues raised

Main Issue	Council Response
	<p>Appendices D and E of the Housing Technical Supplement provide further information in relation to this. The wording of the criteria set out in the draft policy was also discussed with the Council's Building Control unit to ensure no conflict.</p>
<p><b>Miscellaneous issues</b></p>	
<p><b>Flexibility</b> More flexibility is needed and similar wording to that in Para. 7.1.52 should be used to ensure requirements should be reviewed on a case by case basis for more innovative housing types.</p>	<p>The policy justification and amplification are to be read alongside the draft policy itself. The Council, in paragraph 7.1.52, accepts that there will be instances where it is not possible, viable, or practical to accommodate all the listed criteria, and cites the example of converting a historic building into apartments.</p>
<p><b>English Building Regulations</b> Reference to the 2015 revision to the English Building Regulations to incorporate many of the Lifetime Homes Standards and the pressure for a similar change to the NI Regulations. In this context, it is may not be necessary for planning policy to impose these standards – ongoing monitoring of this during the plan-making process is therefore crucial.</p>	<p>Whilst the Lifetime Homes and wheelchair standards are mandatory for the social rented sector and must be applied in order to drawdown grant funding, the more basic access requirements in the NI Building Regulations, are referred to in Guidance: Technical Booklet R (Oct 2012) as <i>'making reasonable provision to ensure that buildings are accessible and useable'</i>. Part R focuses on the visitor to a dwelling, rather than the occupier(s) themselves.</p> <p>When the NI Building Regulations may be updated is beyond the remit of the Council and it is unable to speculate as to which requirements might be mandatory or optional in future revisions. Although the Lifetime Homes standards were incorporated as Category 2 of the English Regulations in 2015, they are optional, rather than mandatory, with Category 1 (the former part M) still remaining the default standard.</p> <p>Taking account of all the above, the Council are content that the requirements</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>of Policy HOU7 are justified and are unlikely to be in conflict with any future revisions to NI Building Regulations. Nevertheless, as suggested, the Council will continue to monitor this throughout the plan period and can make any necessary changes as part of the statutory review processes.</p>
<p><b>Active stock management</b>            Consideration that the Plan could be stronger on the need for the active stock management of all housing, i.e. a 'better size and fit' of housing types for the changing demographic pattern</p>	<p>The Council recognise the importance of promoting choice to assist in meeting existing and future community needs and it is considered that draft policy HOU7 will facilitate this. Please also see response under 'Deliverability' in summary of responses to Policy HOU6.</p>

### Policy HOU8 – Specialist residential accommodation

#### Summary of Responses

13 respondents provided comments in relation to Policy HOU8, which can be summarised as follows:

- Eight respondents expressed **support for/welcomed** the policy;
- The requirement for a **statement of specialist housing need** in criteria a) should be removed in the absence of any policy basis in the Strategic Planning Policy Statement (SPPS) and in the context of the acknowledgement within the justification that there is a need for such development;
- The **policy basis** for the policy in the SPPS relates to supported housing schemes delivered by a public sector body, but it has been applied to all specialist residential accommodation proposals despite there being no policy basis for that approach;
- Several related to the **evidence base**, specifically:
  - There is a lack of evidence and non-appreciation of the range of uses which could be provided within a specialist housing development. Evidence is therefore required in relation to the range of products to enable exemptions to criterion b), such as where proposals involve a mix of uses intended to serve the development or where the type of specialist residential development is unsuitable within an established residential area;
  - There is no evidence as to why specialist residential accommodation that may draw from an area wider than the local community has not been catered for; and
  - Querying whether the population assessments used and if the assessments take account of population increases over the plan period.
- Reference should be included to the **planning history** of a site; and
- The **definition** of specialist accommodation would require specific supplementary planning guidance (SPG).

#### Responses received

Reference	Respondent
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus Healthcare Developments (HK) Ltd
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association

Reference	Respondent
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

## Council response to key issues raised

Reference	Respondent
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution

Reference	Respondent
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Support expressed for the positive policy position in relation to specialist accommodation such as extra-care and dementia friendly homes. The exemption of specialist residential accommodation from affordable housing obligations was also welcomed.	Support for the proposed policy approach is welcomed.
<b>Statement of specialist housing need</b>	
The Housing Technical Supplement identifies a growing need for specialist housing which is likely to increase with an ageing population and relatively high levels of poor health in parts of the city. However, this does not align with the policy position regarding the requirement for a statement of need (criterion a). Without an identified market demand, a private operator would not pursue such a specialist product	<p>The Council acknowledge that there will be an increasing need for specialist residential accommodation over the plan period. For example, as noted in the policy justification and amplification, independent research undertaken to inform the Plan (Addendum to the Housing Growth Options Report – Size and Type of Housing needed, Turley, 2017) suggests a need for 820 additional bed spaces in residential care homes for older residents over the Plan period.</p> <p>However it is important that the type of accommodation provided matches the most up-to-date evidence of housing need given that such specialist forms of accommodation are usually unsuitable for alternative use. Given that needs may change over the 15 year lifetime of the plan, it is therefore prudent to ensure that provision continues to reflect need and does not result in excessive speculation. This same research quoted above recommends on-going monitoring to ensure supply continues to meet need over the plan period. Draft Policy HOU8 therefore aims to facilitate development to</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>meet need and assist in the monitoring of supply in relation to demand over the Plan Period.</p> <p>Public sector schemes will be brought forward through a rigorous commissioning process in response to identified needs. Similarly, respondents contend that a private operator would not pursue specialist products without evidence of market demand. It should therefore not be onerous for any applicant to provide evidence of the need their proposals are seeking to address. Such an approach will also ensure information is available for monitoring purposes and to assist subsequent proposers in identifying unmet needs.</p>
<b>Policy context</b>	
<p>There is no policy basis within the SPPS to support the approach advocated. The council has applied the SPPS approach to supported housing schemes delivered by a public sector body to all types of specialist residential accommodation.</p>	<p>The SPPS is considered sufficiently broad in referring to supported housing as addressing a <i>'need which cannot be met through a general needs housing solution but requires the provision of a specialised, accommodation based solution'</i>. Draft policy HOU8, refers to sheltered housing, extra care housing, nursing homes and retirement villages, all of which fall within this definition as they all meet specific needs not accommodated by general needs housing provision.</p>
<b>Evidence base</b>	
<p>There is a lack of evidence and non-appreciation of the range of uses which could be provided within a specialist housing development. Evidence is therefore required in relation to the range of products to enable exemptions to criterion b), such as where proposals involve a mix of uses intended to serve the development or where the type of specialist</p>	<p>The evidence base prepared to inform the draft Plan Strategy highlights the increasing need for specialist residential accommodation over the plan period. For example, the NIHE's Housing Market Analysis Update identifies the need for planning, housing and social care policies to address the growing needs of households with disability or mobility problems. Independent research</p>



## Council response to key issues raised

Main Issue	Council Response
<p>residential development is unsuitable within an established residential area.</p>	<p><i>(Addendum to the Housing Growth Options Report – Size and Type of Housing needed, Turley, 2017)</i> also suggests a high need for additional bed spaces in residential care homes over the Plan period. A pro-active policy to help manage the supply of suitable specialist accommodation to meet this growing need in appropriate locations with good service provision is therefore clearly justified.</p> <p>However, while the Council recognises that some specialist residential developments can include support services and facilities such as a shop, GP surgery or pharmacy, these are often limited in the range of services on offer or lack the critical mass to ensure longer-term viability if delivered in more peripheral locations. The locational criterion b) therefore seeks to ensure convenient access to as wide a range of services as possible, responding to the mobility issues that many older and disabled persons may face. Public transport options should also be readily available.</p> <p>The current policy wording makes no reference to location in relation to established residential areas. However, the accompanying justification and amplification notes the need for balance between ensuring access to services and protecting established character of existing residential areas. The compatibility of specific schemes within established residential areas is therefore an issue that would be assessed on a case-by-case basis.</p>
<p>No evidence has been given as to why private specialist residential accommodation, which may draw from an area wider than the defined local community, is not catered for.</p>	<p>The proposed wording of draft policy HOU8 does not preclude the consideration of schemes for private specialist residential accommodation. It is acknowledged that such schemes, whether public sector or</p>

## Council response to key issues raised

Main Issue	Council Response
	private, may draw residents from an area wider than the local community.
Evidence should be provided for the population assessments used and if those assessments take into consideration the increase in population over the plan period.	The justification and amplification text notes a need for over 820 additional bed spaces for older residents over the plan period. This is based on the assessment of need associated with the preferred population growth scenario set out in the Belfast Agenda as evidenced through the 'Housing Growth Options Report'. It therefore takes into account increases in population expected over the plan period. The specific need for housing for older people was identified through the Addendum to the Housing Growth Options report on 'Size and Type of Housing Needed'. This same research suggested that the number of households with specific needs are also likely to increase and recommends on-going monitoring to ensure supply continues to meet need over the plan period.
<b>Miscellaneous issues</b>	
<p><b>Planning history</b></p> <p>The planning history of a site should be included within the policy criteria.</p>	The planning history of a site (through previous planning approvals) is a material planning consideration and will be taken into account when considering any future planning applications. To add such a criteria to the policy could result in greater weight being given to planning precedents set before the new policy was adopted, which could actually work to reduce the impact of the new policy.
<p><b>Supplementary Planning Guidance (SPG)</b></p> <p>The definition of specialist accommodation would require specific SPG.</p>	Appendix E of the dPS outlines the intention to produce SPG on specialist residential accommodation, which is likely to detail the different types and considerations of need that will be facilitated in the Plan.

## Policy HOU9 – Traveller accommodation

### Summary of Responses

Three respondents provided comments in relation to Policy HOU9, two of which were broadly **supportive**. The specific comments made included:

- Concern about the **time** taken to deliver traveller specific accommodation once a need is identified;
- Lack of reference to '**emergency halting sites**' in the list of traveller facilities; and
- Lack of recognition that **key reports** such as 'Out of Sight, Out of Mind' (NI Human Rights Commission).

### Responses received

Reference	Respondent
<a href="#">DPS-B-97-U</a>	Equality Commission for Northern Ireland
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Although traveller accommodation needs are based on the NIHE Traveller Accommodation Needs Assessment, there are often significant delays in the identification of sites and securing planning approval to meet identified need.	<p>The Housing Market Analysis Update (prepared by NIHE in September 2017) notes that there are currently "no traveller accommodation requirements identified for Belfast." However, it also notes that work should have now commenced on a new NI Traveller Accommodation Needs Assessment 2019-24. Any need identified through this updated evidence base can be addressed through the zoning of land as appropriate as part of the subsequent LPP process.</p> <p>Draft Policy HOU9 provides a strategic policy to help in the consideration of proposals for all traveller facilities over the plan period, and should help provide greater certainty and clarity to improve the decision making process for traveller facilities in the future.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Emergency halting sites are not included in the list of Traveller facilities.</p>	<p>The Housing Market Analysis Update (prepared by NIHE in September 2017) outlines three types of accommodation that form part of the NI programme including Group housing, serviced sites and transit sites. An 'Emergency Halting Site', sometimes referred to as 'Temporary Stopping Place', is a temporary (less than 28 days) place to park with appropriate facilities that usually do not require planning permission due to the temporary nature of their use. If such a site is to be used more regularly or for longer periods of time, this suggests an unmet demand which should be addressed through the provision of additional serviced or transit sites. Such sites would then be subject to the requirements of Policy HOU9. See also minor modifications.</p>
<p>There is a lack of recognition that key reports such as the Human Rights Commissions (NIHRC) Report 'Out of Sight, Out of Mind' have been incorporated when writing this section.</p>	<p>All relevant research and information has been reviewed to help inform the preparation of the Plan Strategy. The Council's Planning Service were active participants in the NIHRC research and provided a significant volume of information as part of the investigation. Several members of the LDP team were present at the launch of the 'Out of Sight, Out of Mind' report, which was hosted by Belfast City Council, and cognisance has been paid to the recommendations. This includes the recommendation that "Local Councils should take reasonable steps to prevent undue delays in the planning application process relating to Travellers' accommodation. They should also ensure that all planning decision-making processes are fair, impartial and transparent."</p> <p>As noted above, Draft Policy HOU9 provides a strategic policy to help in the consideration of proposals for all traveller facilities over the plan period, and should help provide greater certainty and clarity to improve the decision making process for traveller facilities in the future.</p>

## Policy HOU10 – Housing management areas (HMAs)

### Summary of Responses:

Six respondents provided comments in relation to Policy HOU10, which can be summarised as follows:

- **Support** for the policy, as Houses in Multiple Occupation (HMOs) can help meet the need for affordable housing;
- The provision of HMOs and Housing Management Areas (HMAs) must consider the broader role of the **private rented sector (PRS)** and its impact on the residential nature of areas. The policy needs to address the growing housing need – both PRS accommodation being used by the statutory bodies to deliver housing alternatives and the impact of HMOs in areas of high housing need on social/affordable housing;
- The need for **enforcement** and clear guidance to prevent an increase in the number of HMOs/flats in HMAs.
- The 20% **threshold** was questioned, with a suggestion that 20% is well below the existing level in HMO Policy Areas versus the suggestion that the threshold for HMOs/flats in HMAs should be reduced to 10% to support rebalancing of communities. It was also suggested that the threshold should take into the suitability of buildings for non-HMO/flat use;
- Concerns with the accuracy and transparency of the **evidence base**;
- ‘Balanced communities’ have not been maintained through the existing HMO policies and the proposed approach is seeking to continue these **existing policy failures**. Existing problems associated with concentrations of HMOs have worsened since the introduction of HMO Policies, and there is a need to restore environmental quality through pro-active efforts to reduce the number of HMOs in areas where there is overprovision;
- Reference was made to the aspirations within the plan to **build community cohesion**, but not in relation to areas experiencing an overprovision of HMOs, such as Stranmillis and the Holyland;
- Problems associated with long-stay parking and desire to implement new **resident parking schemes**.
- There is an inherent unfairness in the **ratings system** with regard to private properties and HMOs; and
- An issue was raised in relation to a lack of awareness of the **consultation process**.

### Responses received

Reference	Respondent
<a href="#">DPS-A-68-S</a>	Áine Groogan
<a href="#">DPS-A-66-Q</a>	Ben McClelland
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-A-63-M</a>	Padraig Walsh
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-Q9-N</a>	Total Architecture

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>Support for policy, noting that HMOs can meet need for affordable housing, but need to be well managed to ensure a balance of housing stock.</p>	<p>Support for the proposed policy approach is welcomed. The policy approach seeks to meet the need for shared housing, while protecting residential quality and ensuring balanced communities.</p>
<p>The provision of HMOs and HMAs must consider the broader role of the private rented sector (PRS) and its impact on the residential nature of areas. The policy needs to recognise and address the needs of those in housing stress and the impact the PRS is having in areas of high housing need. PRS accommodation is being used by statutory bodies to deliver housing alternatives.</p>	<p>Whilst the Council acknowledge that PRS properties can impact upon the residential nature of a community, in planning terms, there is no distinction drawn within the Planning (Use Classes) Order (NI) 2015 between different tenures of housing units. There is therefore no mechanism available within the planning system to manage concentrations of private rented housing.</p> <p>HMOs, by definition, are part of the PRS. However, as defined in the Houses in Multiple Occupation Act (Northern Ireland) 2016, HMOs are specifically listed in the Use Class Order (NI) as lying outside of any specific class (often referred to as 'sui generis') and can therefore be subject to separate planning controls. Similarly, the creation of new housing units through the sub-division of existing units constitutes development and is therefore also subject to planning controls.</p> <p>The approach to HMOs set out in the Plan Strategy therefore seeks to target HMOs and flat conversions by balancing meeting the desire/need for a shared form of housing against the need to maintain balanced communities. The level of affordable housing need in an area can be considered when designating HMAs as part of the Local Policies Plan (LPP) process.</p>
<p>Increase in HMOs and flat conversions in an area marked as a HMA. Strategy/policy not realistic if not enforced and clear guidance needed to</p>	<p>HMAs will be identified at the LPP stage. Policy and justification/amplification offers clear guidance for planning application decision-making in respect of proposed HMA</p>

## Council response to key issues raised

Main Issue	Council Response
prevent further HMOs/flat conversions in HMAs.	designations. The Council's planning enforcement team will investigate any reports alleging a breach/breaches of planning control.
In relation to the 20% threshold proposed for designated HMAs, it was suggested that this is well below existing levels of such accommodation in HMAs. However, this is balanced against the suggestion that the threshold figure should be 10% to ensure support the rebalancing of communities within HMAs. Account should also be taken of existing buildings within HMAs and whether they are suitable for non-HMO/flat use (i.e. terraced houses that lack private amenity space/parking are not desirable for modern family needs).	<p>The 20% threshold is deemed appropriate to meet the need for shared housing and to protect residential quality and ensure balanced communities. It is based on the most robust evidence available to the Council at the time of drafting this policy. This suggests that a higher threshold would result in more HMOs/flats resulting in areas where there are already problems associated with concentrations.</p> <p>The exact extent of HMAs will be identified at the LPP stage based on the most robust evidence available at that time, taking into account all considerations, such as suitability of existing residential accommodation.</p> <p>The threshold is intended to help protect residential quality and ensure balanced communities, but there is little scope through the adoption of a threshold-type planning policy to reduce numbers in areas where there are already concentrations. Instead, the Council are pro-actively promoting Intensive housing nodes (IHN) under Policy HOU11 to direct shared forms of housing to suitable locations that can accommodate higher concentrations. Policy HOU12 also seeks to support Purpose Built Managed Student Accommodation in appropriate locations to help reduced overall demand for intensive forms of housing in locations already experiencing problems. These linked policies will work together to help maintain balanced communities.</p>
The percentage figure listed by Planning for the number of HMOs in the Sandymount Policy area is incorrect and there is secrecy in relation to the NIHE HMO Register.	The Council acknowledge the discrepancy between planning records and the NIHE HMO Register within Technical Supplement 02: Housing and it is likely that neither data source provides a 100% accurate picture. The Council will continue to keep this evidence base under

## Council response to key issues raised

Main Issue	Council Response
	<p>review and will make future decisions based on the most up to date evidence available.</p> <p>Since the publication of the draft Plan Strategy, a new statutory HMO Licensing Scheme has been introduced to replace the NIHE registration scheme, and responsibility for future licensing has transferred from NIHE to the Council. This will allow the Council to review both data sources in detail and necessary actions taken to address any discrepancies between the two data sets.</p> <p>It should be noted, as the definition of HMOs requires knowledge of the relationships between tenants, there can be a perception that more properties are in HMO use than actually are. The policy also acknowledges that where properties have been sub-divided and fall outside of HMO definitions (due to the relationships of people within) or where the conversion/sub-division of existing properties to flats/apartments has occurred.</p>
<p>It was suggested that ‘balanced communities’ have not been maintained through the existing HMO policies and that the approach is seeking to continue the existing policy failures. Respondents referenced a list of existing problems associated with concentrations of HMOs, such as parking, cleansing and noise control, and noted the need to restore environmental quality through proactive efforts to reduce the number of HMOs in areas where there is overprovision. Reference was made to the aspirations within the plan to build community cohesion, but not in relation to areas experiencing an overprovision of HMOs, such as Stranmillis and the Holyland.</p>	<p>The Council acknowledge that, under current HMO policies as set out in the HMOs Subject Plan, instances may have occurred whereby applicants have sought to circumvent HMO restrictions by sub-dividing larger properties into flats and apartments. The policies proposed within Policy HOU10 therefore seek to build on the existing policies, rather than continue the existing approach unchanged. They do this by setting a threshold within HMAs for the percentage of HMOs and flats/apartments combined. This seeks to maintain a balance between meeting the desire/need for a shared form of housing and helping to sustain balanced communities.</p> <p>The purpose of the Plan is to guide future development across the Council area by setting out policies applicable to future planning</p>



## Council response to key issues raised

Main Issue	Council Response
	<p>applications. As such, unfortunately new policies cannot be applied retrospectively to revert an area to an earlier condition. However, as noted above, it is envisaged that policy approaches of Policy HOU11 and Policy HOU12 will help to ease pressures experienced in areas where there is already an overprovision of intensive forms of housing. The 10% threshold outside of HMAs will help ensure such concentrations don't occur elsewhere in the future.</p> <p>The issues associated with concentrations of HMOs, including behaviours often considered anti-social, are well documented and cannot be addressed through planning policies alone. However, outside of the planning remit, the Council are working with a number of key partners via the Learning City Inter-Agency Group to help tackle the range of issues associated with HMOs.</p>
<p>Problems associated with long-stay parking and desire to implement new resident parking schemes. Such schemes will help promote balanced communities, but can be blocked by HMO Landlords and traders.</p>	<p>The responsibility for implementing Residents Parking Schemes lies with the Department for Infrastructure (Dfi) and is outside of the remit of the Plan to address. However, as noted by respondents, there has been limited progress on delivering such schemes.</p> <p>The Belfast Metropolitan Transport Plan 2015 states that "controls in the form of residents parking schemes will be implemented in order to restrict parking availability" in the Belfast City Centre Core and Fringe Zones. It is anticipated that Dfi will consider this approach through the revised Belfast Transport Strategy and Plan process which is currently underway.</p> <p>The Council is supportive of the approach and our Car Parking Strategy and Action Plan published in April 2018 states the following action as a priority "work with Dfi and local communities to consider parking management</p>

## Council response to key issues raised

Main Issue	Council Response
	for inner city areas, either through the implementation of on-street parking regimes or Residents Parking schemes.”
The ratings system is unfair with regards to classifications of private houses and HMOs.	Land & Property Services (LPS) are responsible for the billing and collection of rates in Northern Ireland. Issues with the ratings system is a matter for that agency and fall outside of the remit of this consultation.
There was lack of awareness in relation to the consultation on the dPS.	The Council carried out an extensive engagement exercise in which a number of public events were held to raise awareness of the consultation, together with meetings and workshops. In addition, a leaflet and summary document were produced and a comprehensive media schedule, including press releases, photocalls and use of social media platforms were employed to help raise awareness.

## Policy HOU11 – Intensive housing nodes

### Summary of Responses

Four respondents provided comments in relation to Policy HOU11, which can be summarised as follows:

- **Support** for the policy, agreeing that in suitable locations it may be appropriate to have higher percentages of HMOs to meet needs;
- **Evidence** should be provided:
  - To define 'town cramming';
  - In relation to processes/procedures informing the assessment of housing demand/need; and
  - The impact of 'geographic dispersal' on the demand for homes and therefore deliverability.
- **More nodes** should be designated, specifically suggesting that properties in HMAs which are located on arterial routes should be designated as nodes.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AG-K</a>	Carville Developments Limited
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-Q9-N</a>	Total Architecture

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Support for proposed policy, agreeing that in suitable locations it may be appropriate to have a higher percentages of HMOs to help meet needs.	Support for the proposed policy approach is welcomed.
<b>Evidence</b>	
Evidence should be provided to detail what 'town cramming' is.	It is not considered necessary that evidence be provided to detail what 'town cramming' is. The term 'town cramming' is referenced in regional policy and a broad definition is provided within paragraph 6.137 of the SPPS. Development Control Advice Note (DCAN) 8: Housing in Existing Urban Areas provides a fuller definition, referring to it in terms of unsympathetic development being forced into established residential areas, with negative

## Council response to key issues raised

Main Issue	Council Response
	<p>impacts on environmental quality, local character and the privacy of existing residents. The SPPS notes at paragraph 1.14 that the full suite of DCANs will continue to be a material planning consideration following adoption of the Plan Strategy. Subsequent SPG will further reference town cramming.</p>
<p>Evidence should be provided to detail how housing demand/need is assessed in the context of this policy, who does it, on what basis, the timeframe for so doing and how it can be challenged.</p>	<p>The designation of Intensive Housing Nodes (IHNs) within the Local Policies Plan, will take into account the need and demand for intensive forms of housing as identified within the most up to date Housing Market Analysis, prepared periodically by NIHE, available at the time. There is therefore no requirement to address demand or need at the time of application in relation to this policy.</p>
<p>Evidence should be provided for the 'geographic dispersal' and the impact this has on the demand for homes and therefore deliverability.</p>	<p>Evidence shows numerous issues associated with the over-proliferation of intensive forms of housing (i.e. high concentrations of HMOs/flats) in particular areas of the city. IHNs seek to meet the demand/need for shared forms of housing by directing them to appropriate locations, helping to ease pressures experienced in areas where there are high concentrations of properties in use as HMOs/flats. The designation of IHNs is therefore a form of 'geographic dispersal' of intensive forms of housing. Existing HMO development nodes as designated in the HMOs Subject Plan for Belfast City Council Area 2015 are not subject to the range of issues impacting HMO policy areas.</p>
<p><b>More Nodes</b></p>	
<p>There are not enough nodes. More nodes are required and properties in HMAs that are located on arterial routes should be designated as nodes.</p>	<p>As noted at paragraph 7.1.75, IHNs will seek to prioritise locations with good sustainable transport connectivity and access to jobs and services, which may include appropriate locations on City Corridors (formerly Arterial Routes). IHNs will be designated as part of the Local Policies Plan following adoption of the Plan Strategy.</p>

## Policy HOU12 – Large scale purpose built managed student accommodation (PBMSA)

### Summary of Responses

Six respondents provided comments in relation to Policy HOU12, which can be summarised as follows:

- **Support** for the policy to avoid concentrations of students in established residential areas and belief that management of student accommodation may reduce anti-social behaviour as well as providing a safe environment for students;
- The addition of a **policy aim** at the start of Section 7.1 to reference PBMSA and other forms of specialist residential accommodation;
- The policy is **not suitable** for students at Queen's University as there is minimal scope for such developments in close proximity to the university.
- Changes in respect of specific criteria within the policy, including:
  - Criterion b) the requirement for a minimum of **200 occupants**; and
  - Criterion e) the requirement for a statement of **student housing need**.
- The need for clarity in respect of relationship between the policy and **Policy HOU5: Affordable housing**;
- The use of bed spaces **outside of term times**;
- The policy should not prohibit development within **existing residential areas**; and
- Careful consideration is required when processing applications that may **impact on existing communities** and neighbourhoods.

### Responses received

Reference	Respondent
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade & Commerce (BCTC)
<a href="#">DPS-B-92-P</a>	Historic Buildings Council

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-8G-A</a>	Queen's University Belfast
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-Q9-N</a>	Total Architecture

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support for the policy to avoid concentrations of students in established residential areas. The management of student accommodation may also reduce	Support for the proposed policy is welcomed.

## Council response to key issues raised

Main Issue	Council Response
<p>anti-social behaviour as well as providing a safe environment for students.</p>	
<p>There is no explicit reference to 'specialist housing' in the Policy Aims (Para. 7.1.5). An additional policy aim was proposed to address this, referring to specialist housing needs, shared housing, student accommodation and traveller accommodation.</p>	<p>The lack of explicit reference to 'specialist housing' in relation to the aims of the housing policies does not affect the soundness of the plan. Notwithstanding, see minor modifications.</p>
<p>The policy is not suitable for students at Queen's University as there is minimal scope for such developments in close proximity to the university. Suitable sites should be identified for PBMSA within acceptable walking distance of the university and threshold for HMOs &amp; flat conversions in all HMAs should be increased.</p>	<p>Criterion a, identifies the need for proposals to be accessible to higher education institution (HEI) campuses via sustainable transport modes. Further guidance relating to location and accessibility is provided in current Supplementary Planning Guidance (SPG) for PBMSA in Belfast. The Council will revise this existing SPG in line with the new LDP and will consider changes to guidance on location and accessibility, as necessary, but does not consider it appropriate to identify specific sites for PBMSA.</p> <p>Consideration of the threshold for HMOs and flat conversions in HMAs is addressed in the section on Policy HOU10: Housing Management Areas.</p>
<p>A number of respondents made comment in relation to the requirement for a minimum of 200 occupants, suggesting it is unnecessary and that flexibility should be applied if there is evidence that full time management could be supported in smaller developments. It was also suggested that the policy title should be amended to remove reference to 'large scale' and that smaller units can be delivered with much less damage to the urban environment.</p>	<p>The main concern relating to Criterion b) is the need for appropriate management arrangements for PBMSA. The report of the Planning Appeals Commission into objections to the Houses in Multiple Occupation (HMOs) Subject Plan for Belfast City Council Area 2015 considered Departmental evidence which suggested that full time management of purpose built large scale halls of residence would not be economically viable for complexes of less than 200 students.</p> <p>The PAC report recommended that the policy title relating to the use should be amended to refer to "Large Scale Purpose</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Built Student Accommodation" and that Criterion 1 of that policy should be reworded to the effect that developments should consist of a minimum of 200 occupants. This recommendation is reflected in Policy HMO 7 of the current (adopted) HMOs Subject Plan and has therefore been continued into draft Policy HOU12.</p> <p>This does not preclude the development of smaller PBMSA developments, but rather recognises that smaller developments are unlikely to be able to support the level of management required to maximise the benefits of PBMSA. Proposals for smaller PBMSA developments will therefore be considered on their merits.</p>
<p>The requirement for a statement of student housing need should be removed. This, like all forms of commercial development, must be at the risk of the developer and not determined by the planning authorities.</p>	<p>Existing Supplementary Planning Guidance (SPG) for PBMSA requires that a statement of need should be submitted as part of any application for PBMSA. This approach is considered necessary to ensure the right balance between meeting student housing needs and preventing an over-supply of accommodation that would be unsuitable for any alternative occupation.</p>
<p>The justification and amplification should clarify that HOU5 does not apply to proposals under Policy HOU12.</p>	<p>As PBMSA does not contribute to the general housing stock, affordable housing requirements would apply in the case of PBMSA. This will be addressed in subsequent SPG on affordable housing. See also minor modifications.</p>
<p>The policy should be amended to reference the scope for the use of PBMSA outside of terms times. This is currently only addressed in the justification and amplification text.</p>	<p>The use of occupancy conditions is deemed to be an implicit implication of the policy, which provides accommodation specifically for students. As such, it is considered that the explicit reference within the amplification text is sufficient to ensure this issue is considered on a case by case basis and conditioned appropriately.</p>

## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
The policy should not prohibit development within existing residential areas, not least because the city centre is becoming residential in itself in some areas.	The policy approach is considered appropriate in seeking to protect existing residential areas as defined in Appendix B of the draft Plan. The approach would not preclude the delivery of PBMSA within the city centre or other areas accessible to the City's HEI campuses.
Careful consideration is required when processing applications that may impact on existing communities and neighbourhoods.	The approach set out in the Plan Strategy seeks to meet the need for PBMSA and protect established residential areas (see criterion a)) by ensuring that there is a positive integration between student accommodation and existing communities.



## Policy HOU13 – Short-term let accommodation

### Summary of Responses

Four respondents provided comments in relation to Policy HOU13, which can be summarised as follows:

- **Support** for the policy included acknowledgment that it is better to plan for short-term let (STL) development and support the provision of good quality tourist accommodation and support for the siting approach of criterion C.
- The policy could be more effective if 'close proximity' was **defined**;
- Part of the property being in **permanent residential use** may not be viable or physically achievable in small properties;
- Queried whether STL accommodation advertised on Airbnb has received **planning permission** for change of use and, if not, questioned how the Council is monitoring and controlling this along with the Tourist Board and other relevant agencies; and
- STL accommodation is **sited** to HMAs due to transience of tenancy. The respondent suggested STLs should be allowed in HMAs without demonstration of need, and that account should be taken of tourist attractions suitable for STL accommodation as well as properties not suited to modern family requirements.

### Responses received

Reference	Respondent
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-A-Q9-N</a>	Total Architecture

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support for the policy, as it is better to plan for STL development and support provision of good quality tourist accommodation.	Support for the proposed policy approach is welcomed.
Support the siting approach of criterion C, but suggested the policy could be more effective if 'close proximity' was defined.	Support for the siting approach of criterion C is welcomed. See also minor modifications.
Retaining part of the property in permanent residential use may not be viable or physically achievable in small properties.	The requirement for part of the property being in permanent residential use is necessary to protect existing housing stock for long-term residents. It is consistent with

## Council response to key issues raised

Main Issue	Council Response
	<p>proposed Policy HOU3: Protection of existing residential accommodation. This criterion only applies for the change of use of existing residential, but would not be relevant in the case of purpose built tourist accommodation.</p>
<p>Have STL accommodation advertised on Airbnb received planning permission for change of use? If not, how is the Council monitoring and controlling this along with the Tourist Board and other relevant agencies.</p>	<p>Not all properties listed on internet letting sites will require planning permission. However, the Council is working closely with Tourism NI – who have statutory responsibility for the certification of such accommodation – to identify properties that may be operating without the necessary planning consents.</p>
<p>STL accommodation is suited to HMAs due to transience of tenancy. STLs should be allowed in HMAs without demonstration of need, and account should be taken of tourist attractions suitable for STL accommodation as well as properties not suited to modern family requirements.</p>	<p>STL accommodation has the potential to exacerbate some of the problems already associated with concentrations of intensive housing uses in HMAs given their transient nature. Accordingly, the policy seeks to avoid STL accommodation, but allows exceptions to be made based on the demonstration of need if there is unmet demand for tourist accommodation in a specific locality. Other forms of tourist accommodation may still be appropriate in such locations subject to wider policies on overnight visitor accommodation. The Policy as drafted is considered to provide sufficient scope/flexibility to ensure that account can be taken of tourist attractions and other properties deemed suitable for STL accommodation.</p>

## Policy DES1 – Principles of urban design

### Summary of Responses

Eleven respondents provided comments in relation to Policy DES1, comments received included:

- Three respondents submitted supporting comments, welcoming the fact that the policies aim for high quality design throughout the city;
- Remaining comments suggested areas that could be explored further within the policy such as neighbourhood identity, improving connectivity and defining high quality urban design and placemaking;
- Respondents also suggested areas requiring further evidence and justification that included, management and monitoring of growth, economic impact of energy efficient design and the retention of trees.

### Representations received

Reference	Respondent
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-11-D</a>	Individual

Reference	Respondent
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage
<a href="#">DPS-A-6X-S</a>	Translink

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Supporting comments noted the benefit of greater design quality and restricting dead frontages. The importance of community involvement and creating a connected city where also raised.	Support for the proposed policy approach is welcomed.
<b>Evidence</b>	
Evidence should be provided to justify " <i>growth ... needs to be managed appropriately to ensure that it occurs in the</i>	Evidence to justify growth established within the urban capacity study.

## Council response to key issues raised

Main Issue	Council Response
<p><i>most suitable locations</i>". Evidence should also be provided as to how this management is to be achieved, by whom, what time frame and what is the economic impact. Further evidence demonstrating how this management is going to defeat market demand.</p>	
<p>A number of comments identified concerns regarding the policies criteria to encourage the integration of energy efficient technologies and the introduction of the BREEAM assessment tool, noting the impact this can have on the development process such as access to NIE grids and the additional costs such measures can incur.</p>	<p>The council acknowledge that energy efficient technologies can create additional issues and can have an impact on upfront costs at the start of the development process. Notwithstanding this, the Council is aware that many developers implement these and indeed higher standards voluntarily due to the longer terms cost benefits as well as a wider acceptance of the environmental benefits these standards offer.</p>
<p>There are no robust baseline evidence, indicators, targets or triggers with which to guide and monitor progress in these highly important areas, which have a cross cutting influence in all other areas of the plan, and which are essential to delivery of the vision for the city. These are serious omissions and thought needs to be given as to how to define and measure objectively what many see as largely subjective topics. However current exemplars exist in other areas of the UK, and elsewhere, and these should be investigated. A related issue, for consideration outside the plan, concerns the responsibility within the council for the ownership of, and driving forward of, the urban design objectives.</p>	<p>Decision making in planning is discretionary where decisions are made having regard to all material considerations. No single planning policy can deal with the myriad of issues that arise during the course of a determination and design issues will always have a degree of subjectivity and professional judgment.</p> <p>The technical supplement has been subject to ongoing analysis and review. Work on this is ongoing.</p>
<p>There is an absence of an up-to-date survey of the transport system and traffic of the district and of a transport plan, these would inform the requirement in Policy DES1(h) to promote <i>'sustainable development that support and encourage walking cycling and access to public transport that maximises</i></p>	<p>The policy approach outlined in DES1 (h) to promote <i>'sustainable development that support and encourage walking cycling and access to public transport that maximises connections to the city's network of green and blue infrastructure'</i> is in line with the SPPS and PfG objectives. The draft Plan</p>

Main Issue	Council Response
<p><i>connections to the city's network of green and blue infrastructure'</i> The policy fails to take full account of the representation made by Translink to the Preferred Options Paper which stated; POP Q21 Placemaking whether it be for new homes or future centres of employment need to be screened for accessibility by modes other than the private car and mitigating measures put in place, be it new infrastructure and /or service support. Promoting travel by more sustainable modes of transport will necessitate the co-operation of adjoining Council areas to facilitate improved infrastructure e.g. Park and Ride. Furthermore, expansion of green infrastructure needs to properly consider the potential impact on existing as well as future public transport networks as well as better integrate with these modes.</p>	<p>Strategy does not outline site specific zonings for new housing and employment sites therefore accessibility analysis has not been carried out. Under the new two tier LDP process, the proposal has always been to carry out more detailed analysis of transport impacts associated with specific sites at the Local Policies Plan Stage.</p>
<p><b>Clarification of policy</b></p>	
<p>Respondents noted the need to acknowledge areas of the city that have a wider significance to the city as well as being part of a local area.</p>	<p>Local distinctiveness is a key theme throughout all design policies and is also supported by strategic policy SP5. The justification text highlights the importance of locally distinctive characteristics regardless of whether they are of significance locally or city wide. Areas of wider significance are not identified and are somewhat subjective, however further character area studies and locational policies will follow within the LPP stage.</p>
<p>The impact of development on amenity, loss of daylight/sunlight (7.2.18) has been highlighted within two responses which suggest the policy criteria conflicts with the need for diversification.</p>	<p>LDP policies relating to placemaking and design will ensure all development will enhance the quality of places and spaces, and respond positively to aspects of local context and character that contribute towards a sense of place. The potential impact of development on amenity will be assessed at planning application stage and consideration will be given to elements</p>

## Council response to key issues raised

Main Issue	Council Response
	such as visual impact, loss of light, overlooking, privacy, disturbance and likely traffic movements. Planning legislation and policy cannot seek to enshrine individuals right to a particular view, however LDP policies relating to design and placemaking will ensure that development by virtue of its scale, siting and layout will not cause material harm to outlook or privacy.
The protection and enhancement of differing neighbourhoods outside the inner core was highlighted and how the plan strategically aims to break down barriers between areas and promote connectivity and well-being.	The draft Plan Strategy has a number of policies that aim to promote greater local identity not only through the DES policies but also at a strategic level, SP5, SP6. The need to create locally distinctive places that are connected and welcoming is essential to creating places for people within the city as a whole.
One organisation noted that although the plan advocates high quality design and placemaking, there is a lack of definition of what these terms mean within the Belfast context and how they should be monitored and highlighted that although this is subjective there are exemplars within areas of the UK.	Defining high quality design and placemaking can be difficult due to its subjective nature. The policy therefore aims to establish principles that promote contextually appropriate, high quality development. While a definition of the term 'placemaking' is included within the draft Plan Strategy glossary (pg 299), the draft Plan Strategy will also be supported by design SPG and the LPP stage will also provide an opportunity to develop locational based policies.
<b>Suggested policy amendments</b>	
Criteria to retain existing trees has been highlighted in respect to potentially hindering development, suggested that the policy should be adopted to enable the removal of trees that do not have a TPO.	The policy criteria has been included to protect the character and appearance of areas within the city that benefit from existing tree coverage. A primary function of the planning system is the protection and integration of key environmental assets. It is acknowledged that there will be cases when trees will be required to be removed to accommodate development. Where this is the case, consideration will be given to appropriate replanting and

## Council response to key issues raised

Main Issue	Council Response
	landscaping, which is supported by policy TREE1.
It was suggested by one respondent that reference should be made to acknowledge innovative development models and design proposals that explore a contemporary built language.	<p>The need for innovative and creative design within the city is acknowledged and encouraged, as highlighted in paragraph 7.2.5 <i>"The urban design policy should not lead to a rigid and formulaic approach to decision making but instead encourage good design and responsible innovation, originality or initiative as outlined within the SPPS."</i></p> <p>DES1 sets out strategic principles that should apply to all types of development, particularly those that aim to create dynamic architectural developments within the city.</p>
In addition to the expectation that all applications will be expected to adhere to supplementary planning guidance and policy criteria (a) – (k), the policy wording should also include <i>'planning permission will be subject to meeting all other policy requirements'</i> to make it more effective and consistent with Paragraph 3.9 of the SPPS.	The plan is intended to be read in the round with design policies being applied in conjunction with a range of other policies contained within the plan.
<b>General comments</b>	
Supportive of policy DES1, DES2 and DES 3. Re design and the restriction on tall buildings. The remainder of the plan is excellent.	Support for the policy is welcomed
Supportive of Policy DES1 particularly in relation to the unacceptability of basement/semi basement car parks which create dead frontage and a threatening and unpleasant environment.	Support for the policy is welcomed
We support the policy and all the principles of urban design. However, we would like to see the policy reinforce the importance of community involvement over simple consultation and to encourage planning applications to engage with local people beyond the required statement of community involvement.	Support for the policy is welcomed. The plan is intended to be read in the round with design policies being applied in conjunction with a range of other policies contained within the plan.

## Council response to key issues raised

Main Issue	Council Response
<p>It is essential that urban design is not tick box exercise but takes a holistic place making approach. Individual design issues should not detract from the overall quality and importance of places.</p>	
<p>Improved connectivity throughout the city is a main objective of DES1 that has been commented on within a number of responses. In particular the need for development to utilise public transport and promote further connections to areas outside the city centre.</p>	<p>The importance of achieving a highly connected and sustainable city is acknowledged throughout the draft Plan Strategy and is included within a number of policy areas. Supplementary planning guidance will also support this policy approach (also LPP stage and masterplans).</p>
<p>One response highlighted the area of biodiversity within the design process and the need to consider the quality of a place from a biodiversity perspective within the development process.</p> <p>There is no recognition either implicit or explicit that good design can promote biodiversity and encourage wildlife (as stated in PPS 7, paragraph 4.3), this is a step backwards in policy formulation for sustainable development and biodiversity.</p>	<p>High quality design that takes account of its surrounding context is promoted through DES1 and supported by additional policies within the draft Plan Strategy, and as such will be utilised alongside each other to help promote and protect the city's built and natural environments. The area of sustainable design will also be supported by SPG.</p>
<p>One respondent commented that DES1 policy criteria did not cover developments that deal with "<i>problematic land</i>" such as bonfire sites.</p>	<p>The draft Plan Strategy strategically addresses the areas of the city that have been affected by the troubles and the unique issues surrounding certain physical barriers such as that identified. DES1 is intended to be read alongside a number of strategic policies, including Community Cohesion SP4 and Positive Placemaking SP5. It is however important to outline that each individual site will be considered on its own material considerations as there is not a one size fits all solution. The issue of bonfires also lies outside the remit of the plan.</p>



## Policy DES2 – Masterplanning approach for major development

### Summary of Responses

Twelve respondents provided comments in relation to Policy DES2, comments received included:

- Four respondents submitted supporting comments, welcoming the strategic masterplanning approach for major development which support the principles of placemaking;
- Concern regarding policy criteria for the retention of existing trees;
- The inclusion of sustainable assessment tool BREEAM and potential impacts on development;
- Suggested policy wording amendments and clarifications also highlighted.

### Representations received

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-UQ-H</a>	Department of Communities – Historic Environment Division

Reference	Respondent
<a href="#">DPS-A-6R-K</a>	Organisation
<a href="#">DPS-B-UW-Q</a>	Individual
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-6Q-J</a>	Project Hope
<a href="#">DPS-B-11-D</a>	Wirefox and Bywater Properties Ltd
<a href="#">DPS-A-6X-S</a>	Translink
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p><b>Evidence base</b></p> <p>The inclusion of BREEAM within the policy criteria has been questioned with issues regarding the evidence base supporting this.</p> <p>Evidence should be provided on the necessity of applying BREEAM regulations and the economic impact of doing so.</p>	<p>Sustainable development is an overarching principle of the SPPS and the LDP as indeed are BREEAM standards.</p> <p>The council acknowledges that energy efficient technologies can create additional issues and can have an impact on upfront costs at the start of the development process. Notwithstanding this, the council is aware that many developers implement these and indeed higher standards</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>voluntarily due to the longer-term cost benefits as well as a wider acceptance of the environmental benefits these standards offer.</p> <p>The inclusion of BREEAM within the policy criteria promotes greater awareness and integration of sustainable developments that contribute to tackling the issues of climate change. A degree of flexibility is contained within the wording of the policy which seeks to achieve BREEAM 'excellent' or comparable standard. Further clarity will be provided in forthcoming supplementary planning guidance.</p>
<b>Clarification of policy</b>	
<p>Compliance with regional policy has been mentioned with regards to the wording of policy criteria (h) in that the text does not adhere to RDS RG11 notably 3.30 and SPPS notably 6.12.</p> <p>Recommend greater clarity is required within the justification and amplification text to clarify what item (h) is referring to with regard to "unique parts of the city through the realisation of key landmarks within key prominent or gateway locations". Greater clarity is required to ensure no misinterpretation. To ensure soundness with the RDS and SPPS the policy must make reference to existing landmarks, including heritage assets.</p>	<p>The main aim of DES2 policy criteria (h) is to recognise and appropriately reference those gateway locations within the city where design emphasis can reflect the prominence of these key sites. Greater clarity will be provided in relation to criteria (h) within forthcoming supplementary planning guidance.</p> <p>This policy should also be read alongside policies BH1, BH2, BH3, BH4, BH5 and BH6 which seek to conserve protect and where possible enhance the built heritage and listed buildings of special architectural or historic interest as stated within the RDS (RG11 para 3.30) and the SPPS (6.12). DES2 should therefore be read in conjunction with these policies and not interpreted in isolation.</p>
<p>Section (h) of policy DES2 does not adequately define or specify an acceptable, appropriate landscape management and maintenance plan.</p>	<p>Section (f) of policy DES2 refers to the inclusion of an appropriate landscape management and maintenance plan early in the planning process as an integral part of all landscape proposals. Further details pertaining to what should be included within a landscape management plan and</p>

## Council response to key issues raised

Main Issue	Council Response
	maintenance plan will be included in forthcoming supplementary planning guidance.
Felt that policy CC1 (Development Opportunity Sites) is inconsistent with objectives of policy DES2.	DES2 sets out strategic masterplanning principles for major development which may include, but would not be restricted to, opportunity sites (policy CC1). It is intended that DES2 will complement the more detailed criteria set out within those five masterplan areas identified under policy CC1.
Respondents suggested that the policy criteria did not articulate clearly who the responsibility for producing masterplans laid with.	The policy is intended to help set out guidelines that any public or private sector masterplan should follow to achieve high quality developments throughout the city.
It is not clear what is meant by criterion (d). How can development proposals be required to deliver the identified objectives prior to planning applications being submitted for individual sites? The plan is not sufficiently flexible as it would appear to preclude the ability to bring forward applications for individual sites, which in the long term is likely to prejudice the ability to bring forward much needed development to the city centre.	Criterion (d) relates to the promotion of higher density residential and mixed use developments along city corridors and gateway locations. This element of the policy should be read in conjunction with policy HOU4 which relates to recommended density bands for residential developments.
<b>Suggested policy amendments</b>	
A number of responses outlined concerns regarding the wording of policy criteria " <i>seek to retain existing trees</i> " highlighting that this will constrict design and construction.	The policy criteria seeks to protect existing trees and is amplified within the justification text 7.2.27. See also minor modifications.
One respondent refers to the wording of policy justification text (7.2.25) " <i>materials should complement the character</i> " stating that this will result in pastiche development. Suggested that this be amended to " <i>materials should result in high quality design contrasting with or complementing the character</i> ".	The wording of the policy justification text in 7.2.25 is considered appropriate. High quality design that complements the surrounding context can also include contrasting materials, if considered contextually appropriate.

## Council response to key issues raised

Main Issue	Council Response
<p>Add a bullet point i.e. avoiding prejudice to the local and strategic traffic/road networks, to reduce congestion and promote road safety.</p>	<p>The plan is intended to be read in the round and matters relating to the impact of development on local and strategic traffic/road networks and the reduction of congestion and promotion of road safety are believed to be sufficiently addressed within the draft Plan Strategy as a whole.</p>
<p>Two respondent highlights that while DES2 seeks to require major development to comply with masterplanning principles, the policy does not define 'major projects'.</p> <p>One respondent also states "<i>PPS 7 only requires a concept masterplan for developments over 300 units. The Planning (Development Management) Regulations (Northern Ireland) 2015 defines major development as being over 50 units or over 2 hectares. Clearly a site that has a high density and provides over 50 units could be on a narrow urban footprint, with density achieved in height of the development. Opportunities for master planning are limited in such schemes.</i></p> <p>Policy DES 2 should state that: "<i>Planning permission will normally be granted for major development over 3 hectares where it accords with the following master planning principles</i>".</p>	<p>In the context of Belfast, the LDP will replace regional policy PPS7 as well as a host of other PPSs. This is despite the de facto use of PPS7 in relation to greenfield and largely suburban developments, which is arguably not bespoke to Belfast as we tend to assess higher density development on smaller brownfield sites. It is the council's view that there are opportunities to use this policy on sites more relevant to the needs of the city.</p> <p>Setting minimum site area criteria where DES2 should apply, such as 3 hectares as suggested, is considered inappropriate as this would exclude many smaller but prominent city centre sites where higher densities would be encouraged, which in itself could equate to 'major development'.</p> <p>See also minor modifications.</p>
<p>We support masterplanning approach for major developments. This supports the principle of placemaking. With regards to policy criteria (g), we would like to see that riverside development will not prohibit public walkways alongside the Lagan.</p>	<p>The council welcomes support for this policy. The city's blue and green infrastructure is promoted throughout the plan, policy criteria (g) further supports this and is considered appropriate.</p>
<p><b>General comments</b></p>	
<p>Strong support for a masterplanning approach as proposed for major development but there is no overall strategic framework into which these and smaller projects and developments would</p>	<p>The council welcomes support for this policy. It is intended that DES2 would apply to major developments only. Smaller projects and developments would be assessed under the general principles of</p>

## Council response to key issues raised

Main Issue	Council Response
fit. Difficult to visualise how future development can be adequately controlled and directed to deliver the strategic vision for the city.	urban design policy DES1, as well as all other relevant policies contained within the plan.
We are very supportive of policies DES1, DES2 and DES3. The remainder of the plan is excellent.	The council welcomes support for this policy.
Support the Masterplanning approach for Major Development set out in Policy DES 2 and as set out in the Justification and amplification text Paras 7.2.21 – 7.2.27. Ideally, whilst it may be advantageous for developers and adjacent landowners to collaborate with each other and bring forward one comprehensive development proposal, this is not always possible. It is therefore important that this policy is not overly restrictive whereby smaller scale proposals cannot come forward over time and investment is therefore lost.	The council welcomes support for this policy. The policy approach advocates for greater communication between developers / landowners and a greater awareness of how development can impact the potential of neighbouring sites. Decision making in planning is discretionary where decisions are made having regard to all material considerations. No single planning policy can deal with the myriad of issues that arise during the course of a determination and design issues will always have a degree of subjectivity and professional judgment.

## Council response to key issues raised

### Policy DES3 – Tall buildings

#### Summary of Responses

Twenty one respondents provided comments in relation to Policy DES3, comments received included:

- Several respondents were supportive of the policy approach;
- A number of respondent outlined further policy amendments and areas requiring clarification;
- The evidence base supporting the policy and the justification for the proposed height threshold that would trigger DES3 was discussed within a number of responses;
- General comments were also made in relation to the topic of tall buildings and the role they play within cities. DES3 and its relationship with other policy areas was also mentioned.

#### Representations received

Reference	Respondent
<a href="#">DPS-B-UF-6</a>	Ashton Community Trust
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-UG-7</a>	Benmore Group
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-UW-Q</a>	Individual
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-92-P</a>	Historic Buildings Council

Reference	Respondent
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-U9-S</a>	ArdMackle Architects
<a href="#">DPS-B-A8-4-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-B-8B-5</a>	Osborne and Co.
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd
<a href="#">DPS-B-UZ-T</a>	Organisation

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Support</b>	
Supporting comments referred to the benefits of protecting heritage assets, promoting high quality design,	Support for the proposed policy approach is welcomed.

Main Issue	Council Response
<p>improving legibility, clustering tall buildings, accentuating views/vistas and the creation of new residential and mixed use opportunities which would add to a vibrant economy. A number also highlighted the need for tall buildings to be assessed on a case by case basis.</p>	
<b>Evidence base</b>	
<p>One respondent refers to the list of tall building approvals contained within the evidence base and suggests that these demonstrate that breaking height limits set out in draft BMAP has become the norm.</p> <p>Policy criteria speaks of judging each case on its own merits, this contradiction means that heights are actually determined by precedent of other approvals.</p>	<p>Planning applications have to be considered against all material considerations including policy and planning history. We now operate within a plan led system and the new plan offers an opportunity to review planning approvals which will be considered when setting new policy and identifying suitable locations for taller buildings in the next stage of the plan.</p>
<p>Policy founded on analysis of some but not all extant planning permissions.</p>	<p>This is a new plan going forward into the next 15 years and we will not necessarily be held by previous permissions, particularly where poor decisions were made. However extant permissions are material and will be taken into consideration within the planning process.</p> <p>This table is subject to ongoing review and monitoring, clarification of the methodology and applications included will therefore be subsequently added throughout the plan process.</p>
<p>Additional analysis suggested for evidence base included;</p> <ul style="list-style-type: none"> <li>• Considered all extant planning permissions in the city centre (see Table 5.1);</li> <li>• Analysed other planning permissions and guidance outside the dBMAP city centre boundary and other masterplans/ frameworks;</li> </ul>	<p>The analysis undertaken by council was limited to the city centre boundary due to the current focus of tall building development pressures within this area. Analysis of existing city centre masterplan areas, as referenced under policy CC1, was also undertaken in the formulation of this policy. Further tall building locational assessments may be carried forward at LPP stage, if considered appropriate.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>On the basis that (a) and (b) have not been undertaken the respondent considered the threshold of 35m AOD to be unsound.</p>	
<p>Figure 7.4 of the draft Plan Strategy fails to recognise a considerable amount of development which in its context would be considered a tall building however fall below the threshold of 35m e.g. City Quays hotel, City Quays 1 and multi storey car park.</p>	<p>Only those buildings that exceeded the 35m height threshold were mapped in Figure 7.4 and limited to the city centre boundary (as defined by dBMAP), due to the sensitivities within this area. Further tall building locational assessments may be carried forward at LPP stage where appropriate.</p>
<p>VUCITY analysis to identify clusters and emerging clusters. This additional analysis considers some but not all existing, committed and implemented schemes and therefore we also consider it unsound. Without considering these schemes, which are greater than 35mOD, we would disagree with the identification of the clusters and emerging clusters.</p>	<p>The council's VUCITY model has been utilised to provide an overview of existing built form of the city centre to help inform the policy criteria. The council acknowledges that not all consented and extant permissions have been included, as a result of inconsistencies in applications being modelled at the time of analysis. The analysis has been utilised to help establish a visual representation of the cities built form and we acknowledge the inconsistencies raised.</p> <p>This analysis and the VUCITY software is subject to ongoing review and monitoring. The council considers that such an exercise would not affect the soundness of the plan.</p>
<p>One respondent commented that technical supplement No.6 Urban Environment for dBMAP is considerably out of date and cannot be relied upon for a current picture of the urban design of the city. It should, at least, have been the subject of a review and updating to inform the current draft plan.</p>	<p>The technical supplement has been subject to ongoing analysis and review. However a considerable amount of detail contained within this document is place specific and would benefit the next stage of the plan. Work on this is ongoing.</p>
<p>Draft Belfast building heights guidance policy 2009, should have been reviewed by current LDP team.</p>	<p>The draft Belfast buildings heights guidance policy 2009 has been reviewed by the LDP team. However a considerable amount of detail contained within this document is place specific and would benefit the next stage of the plan. It is also noted that the draft</p>



## Council response to key issues raised

Main Issue	Council Response
	building height document is now 10 years old and was never adopted.
<p>One respondent commented that there is no evidence presented in the topic paper to enable an informed decision to be taken on whether or not the proposed tall building policy in Belfast is necessary.</p>	<p>The council continues to regularly receive planning applications for tall buildings on sites throughout the city. This was recognised by the Department previously when they were the planning authority resulting in the draft building heights guidance policy 2009.</p> <p>Three options were appraised within Appendix 4 (Assessment of Options) of the SA Interim Report in relation to Tall Buildings during the Preferred Options Paper stage of the plan. These comprised Option 1 (Continue Maximum/Minimum height guidance), Option 2 (Specific Tall Buildings Policy) and Option 3 (No policy on Tall Buildings). Following assessment it was concluded that Option 2 (Specific Tall Buildings Policy) was the preferred option. Further details can be found in the SA Interim Report as well as the Preferred Options Paper (Public Consultation Report - July 2017).</p> <p>Tall buildings may be considered acceptable within the appropriate context, where they will not have an unacceptable impact on surroundings and where they are of a high design quality. DES3 enables such development to be managed appropriately so as to minimise any adverse impact such buildings may have.</p>
<p>Several respondents commented that if the council intends to introduce a locational based assessment for tall buildings, evidence to support this change should be provided.</p>	<p>The Urban Design and Built Heritage technical supplement that accompanies the draft Plan Strategy advises that further detailed analysis will be carried out at the LPP stage which may include tall building locational based assessments. Any such analysis would be accompanied by supporting evidence.</p>
<p><b>Comments on policy criteria</b></p>	
<p>One respondent commented that there was subjectivity around the term</p>	<p>Decision making in planning is discretionary where decisions are made having regard to all</p>

## Council response to key issues raised

Main Issue	Council Response
<p>'<i>significantly higher</i>' within the main wording of the policy and also the term '<i>interesting</i>' in relation to criteria (d). Suggests that these arguably introduce uncertainty as to the circumstances in which the policy will be applied.</p>	<p>material considerations. No single planning policy can deal with the myriad of issues that arise during the course of a determination and design issues will always have a degree of subjectivity and professional judgment.</p> <p>The reference to '<i>Significantly higher than their surroundings</i>' within DES3 ensures that a level of protection is afforded to those lower density (largely suburban) areas where proposals may well be under the 35m AOD height threshold yet still represent a comparatively tall building given their lower context. The inclusion of the term 'significant' is considered to be appropriate to distinguish between unacceptable risks and those minor risks for which mitigation may be appropriate.</p> <p>Criteria (d) relates to tall buildings that '<i>Contribute to a cluster or an interesting skyline when grouped together</i>' which acknowledges the role that tall buildings can play in contributing to a legible and varied city skyline. These points will be elaborated upon in forthcoming supplementary planning guidance.</p>
<p>One respondent regards that section of policy which states that existing tall buildings will not set a precedent for similar development on adjacent sites as unsound because it sets aside an assessment of context and character.</p>	<p>Existing tall buildings in Belfast will not necessarily set a policy precedent for similar development on adjacent sites. The council acknowledges that extant planning permissions are material, however we will not necessarily be held by poor decisions.</p> <p>While surrounding context is a material consideration in the assessment of new planning applications, merely identifying taller buildings within the city to justify building height in an entirely different context, will not be considered an acceptable design rationale. In all cases applications for tall buildings will be expected to adhere to supplementary planning guidance.</p>

Main Issue	Council Response
<p>Three respondents commented that the policy criteria under DES3 are considered unsound as they do not read across other policies in the plan, specifically those set out in the built heritage section.</p>	<p>The plan is intended to be read in the round with design policies being applied in conjunction with other policies, including built heritage. Any proposals for taller buildings sited within, or impacting upon, built heritage areas or their setting, will therefore be assessed against both design and built heritage policies and any other policies deemed relevant.</p>
<p>Respecting key public views and vistas is also supported. However the policy should be strengthened to ensure that the impact of tall proposals on the settings of our built heritage assets are also assessed, to reflect the SPPS. Development which has an adverse effect on the settings of heritage assets should be refused. This approach would make the plan more effective in protecting and enhancing our heritage assets consistent with government advice.</p>	<p>The council welcomes support for policy criteria (c) which seeks to respect key public views and vistas.</p> <p>The plan is intended to be read in the round with design policies being applied in conjunction with built heritage policies. Policy criteria DES3 (b) states that planning permission will not be granted for tall buildings that have an adverse impact on heritage assets.</p> <p>The council also considers that the built heritage policies proposed within the plan (BH1-6) includes the necessary safeguards and policy requirements to prevent adverse effects on the setting of heritage assets.</p>
<p>One respondent comments that the policy is not effective and is inconsistent with the SPPS and is therefore unsound.</p>	<p>The council notes that no reference has been made by the respondent to any specific section of the SPPS. The plan is intended to be read in the round with design policies being applied in conjunction with a range of other policies contained within the plan, including those relating to the built and natural heritage.</p>
<p>One respondent commented that the proposed policy falls far short of adequate for tall buildings planning in Belfast. Advocating that tall buildings should be '<i>...sited in locations within the street pattern that terminate or accentuate key vistas and where they place emphasis on areas of civic or visual importance</i>' does not refer to design</p>	<p>The plan is intended to be read in the round with design policies (including DES1 – Principles of Urban Design) being applied in conjunction with other policy areas, including built heritage policies.</p> <p>Any proposals for taller buildings sited within or impacting upon built heritage areas, or their setting, will be assessed against both</p>

## Council response to key issues raised

Main Issue	Council Response
<p>quality, massing or true contextual consideration, and has real potential to conflict with principles for the protection of our built heritage asset and the character of our streets and city. This policy statement pre supposes that tall buildings will enhance our streets and city.</p>	<p>design and built heritage policies as well as any other policy area deemed relevant.</p>
<p>One respondent highlighted uncertainty as to the circumstances in which policy criteria (d) and (e) will be applied in that both need to be met due to the way the policy is expressed.</p> <p>This would leave no scope for single tall building opportunities that would be compliant with criteria (e) if there are no tall buildings in the locality for them to cluster with.</p> <p>Furthermore, criterion (d) and the requirement to contribute to a cluster appears to be cancelled out by the policy text that states, "<i>Existing tall buildings within Belfast will not set a policy precedent for similar development on adjacent heights</i>".</p>	<p>The council acknowledges that cases may exist whereby not all DES3 criteria (a) to (h) can be fully realised in relation to new tall building(s) within the city.</p> <p>This could include the scenario presented by the respondent whereby criteria (e) is met while (d) is not. In such cases the overall positive impacts of the development will be weighed against any potential negative impacts and a balanced assessment made. The policy criteria set out in DES3 are not meant to be interpreted as a tick-box exercise to determine upfront whether a tall building will or will not be granted planning permission. Instead they represent good practice placemaking principles that will be considered in the round in the assessment of tall building proposals.</p> <p>Existing tall buildings within Belfast will not automatically set a policy precedent for similar development on adjacent sites. While surrounding context will be a material consideration in the assessment of a new planning application, merely identifying taller buildings throughout the city to justify building height within an entirely different context will not be considered an acceptable design rationale.</p>
<p>Two respondents highlighted that identifying the role and contribution of tall buildings as part of an overall vision of a place is important, as set out in</p>	<p>The council acknowledges the positive role that tall buildings can play in an evolving city. DES3 sets out good practice placemaking principles which will help in appropriately</p>

Main Issue	Council Response
<p>Historic England's Tall Buildings Advice Note 4, particularly in relation to an evolving skyline.</p>	<p>managing the siting and impact that such buildings may have including any positive benefits to the city skyline.</p>
<p><b>Suggested policy amendments</b></p>	
<p>A number of responses are unresponsive of the wording of the policy including the 35m AOD upper height threshold which would trigger the policy.</p> <p>Based on analysis undertaken they recommend that the threshold of 35m AOD is revisited and the text '<i>those which are significantly higher than their surroundings</i>' is dropped as there is no evidence base for this.</p>	<p>The tall building definition included within DES3 (35m AOD) is based on desktop research and analysis of the city including use of the council's 3D VuCity model. Consideration will be given to buildings which exceed this height, however in such cases DES3 policy criteria would be triggered.</p> <p>The inclusion of the text '<i>...those which are significantly higher than their surroundings</i>' within the definition of a tall building ensures that a level of protection is afforded to those lower density areas where proposed buildings may well be under the 35m AOD height threshold, yet still constitute a tall building given their lower context.</p>
<p>Criteria (d) – a number of responses suggested to replace '<i>Contribute to a cluster or an interesting skyline when grouped together</i>' with '<i>Contribute to a cluster or create a focal point or beacon (a Point Block) which acts as a form of marker contributing to a positive skyline.</i>' As drafted there is a conflict in respect of the clustering and grouping and assessing each application on its own merits. Individually, or in groups, tall buildings can affect the image and identity of the city.</p> <p>Para 3.4 of the Technical Supplement 06 states that '<i>Tall buildings are generally easily recognisable and act as key landmarks within a city's skyline either individually or as a cluster.</i>'</p>	<p>The wording of the policy as drafted is considered to address the areas raised. The wording as suggested regarding the creation of '<i>...a focal point or beacon (a Point Block) which acts as a form of marker...</i>' if unilaterally applied could result in the widespread development of stand-alone tall buildings across the city. This approach would undermine the very objective of DES3 by failing to take into account the hierarchical make-up of the urban fabric of the city and potential impacts on its more sensitive locations including the setting of listed buildings, conservation areas, areas of townscape character and historic monuments/gardens.</p> <p>The council acknowledges the role that tall buildings can play in acting as key landmarks within a city's skyline, as outlined within Technical Supplement 06. However in such</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>cases, new development must be considered appropriate to its context, be of high design quality and demonstrate that it will not have an unacceptable impact on its surroundings.</p>
<p>Criteria (e) – a number of responses suggested to replace '<i>Support locations of civic or visual importance including major transport nodes, civic spaces and areas of high employment</i>' with '<i>Support locations of civic or visual importance including major transport nodes, civic spaces, areas of high employment, at arrival points into the city, waterfront and areas of regeneration including those identified as Development Opportunity Sites and masterplans</i>'.</p> <p>Consideration should be given to including criteria in DES3 that '<i>regard should be had to extant masterplans/frameworks or extant planning permissions whereby locations for taller buildings are identified or approved</i>'.</p>	<p>The wording of criteria (e) as drafted is considered to address the areas raised. Criteria (d) makes reference to city corridors and gateway locations which also addresses areas raised.</p> <p>DES3 sets out good practice placemaking principles that will be considered in the round in the assessment of tall buildings which may include, but would not be restricted to, opportunity sites (policy CC1). It is intended that DES3 will complement the more detailed criteria set out within those five masterplan areas identified under policy CC1.</p> <p>Extant planning permissions would be material considerations in the assessment of any new planning application. Masterplans are only material if they have been composed within specified planning framework. BCC intend to review existing non-statutory masterplans and potentially develop new plans through the LPP stage.</p>
<p>Criteria (f) – a number of responses suggested to add '<i>will bring significant regeneration benefits and contribute positively to place-making</i>' similar to other UK cities it should be acknowledged that taller buildings can act as catalysts for wider regeneration. Skylines of cities such as Manchester, Leeds, Liverpool and Birmingham act as markers and signposts of regeneration.</p>	<p>The wording of the policy as drafted is considered to address the areas raised. DES3 sets out good practice placemaking principles that will be considered in the round in the assessment of tall buildings.</p> <p>Paragraph 3.4 of the Technical Supplement 06 recognises that tall buildings '<i>...are often seen as being an economically viable option especially within city centres, intensifying the use of land and potentially acting as a catalyst for regeneration</i>.' However as a result of their dominant scale and massing, tall buildings can have a greater environmental impact and</p>

Main Issue	Council Response
	therefore require a greater degree of scrutiny and consideration.
<p>Criteria (g) – a number of responses suggested to remove '<i>Existing tall buildings within Belfast will not set a policy precedent for similar development on adjacent sites</i>'. This is unsound because it is an invitation to set aside an assessment of context and character, factors which are genuine and important material considerations in making a planning decision within the new policy framework.</p>	<p>Existing tall buildings in Belfast will not necessarily set a policy precedent for similar development on adjacent sites. The council acknowledges that extant planning permissions are material, however we will not necessarily be held by poor decisions.</p> <p>While surrounding context and character are material considerations in the assessment of new planning applications, merely identifying taller buildings within the city to justify building height in an entirely different context, will not be considered an acceptable design rationale.</p>
<p>Suggested omission of the second sentence in the policy justification text (7.2.29) as it is in conflict with the last paragraph of the policy text. The current wording has potential to retain the existing reactionary planning approach to 'tall buildings'. With the inclusion of this sentence it could be argued that tall buildings are acceptable in locations which otherwise would be deemed inappropriate.</p>	<p>The second sentence of policy justification text (7.2.29) reads '<i>They (tall buildings) should generally be limited to areas where existing clusters of taller buildings have already been established, as well as being sited in locations within the street pattern that terminate or accentuate key vistas and where they place emphasis on areas of civic or visual importance</i>'.</p> <p>The suggested amendment to delete this section of justification text is not supported. DES3 sets out good practice placemaking principles that will be considered in the round in the assessment of tall buildings. These include the resistance of tall buildings that would have an adverse impact on the character and appearance of listed buildings, conservation areas, areas of townscape character and historic monuments/gardens.</p> <p>The text refers to the need for tall buildings to demonstrate that they will not have an unacceptable impact on their surroundings and to be of high quality design. Built heritage policies along with all other relevant policies</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>are considered to achieve the necessary safeguards needed to consider taller buildings throughout the city.</p>
<p>Tall buildings should not be permitted within conservation areas and areas of townscape character and a sympathetic and appropriate height restriction for these areas should be clearly stated.</p>	<p>A blanket policy that does not give due consideration to tall buildings within conservation areas and areas of townscape character, would in itself be unsound. Policy criteria DES3 (b) requires that tall buildings do not have an adverse impact on the character and appearance of listed buildings, conservation areas and areas of townscape character.</p> <p>The plan is intended to be read in the round with design policies being applied in conjunction with built heritage policies (BH1-6) which also include safeguards and policy requirements to prevent adverse effects on the setting of heritage assets.</p>
<p>The conflict between the policy criteria should be removed by amalgamating criteria (d) and (e) with supplementary text as follows, "<i>Contribute to a cluster or an interesting skyline when grouped together, or in locations where no opportunity to cluster exists, tall buildings should support locations of civic or visual importance including major transport nodes, civic spaces and areas of high employment</i>".</p>	<p>The suggested amendment to amalgamate policy criteria (d) and (e) is not supported. The policy criteria set out in DES3 are not meant to be interpreted as a tick-box exercise to determine upfront whether a tall building will or will not be granted planning permission. Instead they represent good practice placemaking principles that will be considered in the round in the assessment of tall buildings.</p>
<p>One respondent has suggested to amend the second sentence of Paragraph 7.2.29 to read '<i>Tall building opportunities will be encouraged to locations where existing clusters of taller buildings have already been established. Opportunities for tall buildings will also be considered outside of existing clusters in locations within the street pattern that terminate or accentuate key vistas and where they place emphasis on areas of civic or visual importance</i>'.</p>	<p>The second sentence of policy justification text (7.2.29) reads '<i>They (tall buildings) should generally be limited to areas where existing clusters of taller buildings have already been established, as well as being sited in locations within the street pattern that terminate or accentuate key vistas and where they place emphasis on areas of civic or visual importance</i>'.</p> <p>The proposed rewording suggests that where clusters do not exist, stand-alone tall buildings</p>



## Council response to key issues raised

Main Issue	Council Response
	<p>should then be considered on all locations that terminate or accentuate key vistas and where they place emphasis on areas of civic or visual importance, which could arguably amount to a wide range of sites across the city. While these aspects may be considerations in themselves, permissions for tall buildings would not be solely assessed against this criteria alone but all those criteria (a) to (h) included within DES3.</p> <p>The rewording of this policy justification text as proposed is therefore not supported.</p>
<p>In conservation areas and areas of townscape character tall buildings should not be permitted and a sympathetic and appropriate height restriction for these areas should be clearly stated within the LDP.</p>	<p>The Council acknowledges that the low lying nature of the historic core of the city means that it is relatively sensitive to the impact of tall buildings. However the council continues to receive planning applications for tall buildings throughout the city, including sites which are next to or within heritage assets.</p> <p>Policy DES3 sets out good practice placemaking principles that will be considered in the round in the assessment and management of tall buildings. Tall building locational based assessments may form part of the LPP stage of the plan and within SPG if considered appropriate.</p>
<p><b>Clarification of policy</b></p>	
<p>Suggested that in order to make the policy sound, it should be clarified that opportunities for 'one-off' tall buildings outside existing established clusters may also be considered acceptable where it can be demonstrated they will not have an unacceptable impact on their surroundings and where they are of a high quality design in their own right, while enhancing their immediate location and wider settings.</p>	<p>The suggested clarification is not supported. DES3 sets out good practice placemaking principles that will be considered in the round in the assessment of tall buildings. These include the resistance of tall buildings that would have an adverse impact on the character and appearance of listed buildings, conservation areas, areas of townscape character and historic monuments/gardens. The clarification suggested regarding 'one-off' tall buildings would undermine the objectives that these principles seek to achieve.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>There is tension between the policy and its supporting technical supplements which suggest that further policies may be brought forward at Local Plan Policies stage based on clusters.</p>	<p>Technical Supplement No.6 (Urban Design and Built Heritage) outlines the intention for further tall buildings analysis within the city at LPP stage. This may include tall building locational based assessments to help inform the LPP and further information to be provided within supplementary planning guidance. See also minor modifications.</p>
<p>Three respondents sought clarity on the requirement for applications to be accompanied by a tall building design statement.</p>	<p>Justification and amplification text 7.2.30 and 7.2.31 outline the need for an accompanying tall building design statement and what such a statement should include. While design and access statements are a useful tool in demonstrating the broad design approach/ethos of a site, a tall building design statement would set out the design vision specifically in relation to the tall building element, clearly outlining how the criteria within DES3 have been addressed and provide justification as to the appropriateness of a tall building at the location proposed. Other detailed factors that would be taken into consideration within the tall building design statement (that may not form part of the traditional design and access statement) are details pertaining to the buildings carbon footprint, energy efficiency, waste management and sustainable construction methods.</p> <p>Further information in relation to tall building design statements will be provided within forthcoming supplementary planning guidance.</p>
<p>A number of respondents note a discrepancy between Policy DES3 and HOU4 (Density for residential development). HOU4 refers to a density based policy approach whereas DES3 only applies to buildings over 35 metres</p>	<p>The Urban Design and Built Heritage technical supplement that accompanies the draft Plan Strategy refers to existing and emerging clusters of tall buildings being identifiable within and bordering the city centre. It also advises that further detailed analysis will be carried out within these broad clusters at the</p>

## Council response to key issues raised

Main Issue	Council Response
<p>in height, which will be assessed against a criteria based assessment.</p>	<p>LPP stage may include taller building locational based assessments. This is what HOU4 is referring to in terms of identifying locations and this ties in with criteria d) of DES3, which refers to '<i>contributing to a cluster...when grouped together</i>'. Further detail in relation to this can also be addressed in future SPG relating to density or urban design (see Appendix E of Plan Strategy). It should also be noted that policy HOU4 refers solely to residential development while DES3 applies to all forms of development. See also minor modifications.</p>
<p><b>General comments</b></p>	
<p>One respondent states that a positive result of such a policy could be to prevent the enormous disparity in heights communities around the core experience in developments immediately adjacent.</p> <p>This respondent further suggests that areas such as inner arterial routes and shatter-zones around the city core need specific designations.</p>	<p>The areas highlighted would require specific locational designations and further analysis with regards to defining such areas in the city along with agreement on what constitutes a '<i>shatter-zone</i>', requiring extensive research and consultation.</p> <p>The issues highlighted will be assessed further at LPP stage, however it is considered inappropriate to identify such areas/designations within the overarching draft Plan Strategy policies.</p>
<p>Existing tall buildings and their impact on residential amenity with regards to overshadowing. There is no agreed shadow cast analysis that deals with studying these issues rationally and fairly. While VuCity can allow this, no light and shading methodology has been agreed.</p>	<p>The impact of existing tall buildings on residential areas as highlighted by the respondent are acknowledged. Policy criteria DES3 (g) highlights the need to minimise the effects of overshadowing and overlooking, particularly within residential areas. The request to include reference to agreed shadow cast analysis is considered overly detailed and specific. This element of DES3 will be supported by forthcoming supplementary planning guidance.</p>
<p>Given the large amounts of excessive space and shatter-zones it would be better to cap heights which would regularise site values, bring certainty and increase the 'filling in' of the 'missing city'.</p>	<p>Capping heights would involve place specific polices to be put in place with heights differing throughout the city, which is not considered appropriate at this strategic policy level stage of the plan.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>A respondent advocated that dense cities are not wrong. <i>'Berlin and Paris at 7/8 storeys create much higher densities than Belfast. Density is a function of clever and astute urban form, courtyards, wide pavements, tree lined avenues as amenity and the balance of built form to space to create maximum density while maintaining the quality of urban space'</i>. Other forms of building types available that can introduce varied densities within the city that don't necessarily involve building taller.</p>	<p>The council agrees with this response and would refer to the density study outlined within the supporting evidence documents. The 7/8 storeys as suggested also reflects the general height datum within the city centre which fed into the definition of a tall building as contained within DES3 (35m AOD) height threshold.</p> <p>We acknowledge that there is a role for taller buildings but not at the expense of the established character and the general height datum, key factors which contribute to Belfast's sense of place.</p>
<p>Impact of tall buildings on inner city working class areas, referenced within judicial reviews and well published cases (Stephen Street, Stewart Street, and UU), these cases could be studied and drawn with care in tall buildings paper.</p>	<p>The wording of the policy as drafted is considered to address the issue raised. Forthcoming tall buildings supplementary planning guidance will provide an opportunity for further guidance.</p>
<p>Respondents highlighted areas within the city (Waterfront locations, Titanic Quarter) which were also appropriate for tall buildings.</p>	<p>The policy is intended to strategically assess tall buildings regardless of their location within the city. Locational aspects may be looked at in further detail during the LPP stage.</p>
<p>Respondents highlighted the need for the city to accommodate the expected growth figures and indicated the role that higher and denser buildings will have in meeting this demand. The council needs to be flexible and to be able to respond to changing economic conditions.</p>	<p>The policy criteria aims to assess applications for taller buildings within the city that will not only meet changing economic demands but also add to the diverse built heritage. The policy advocates ways in which tall buildings can be appropriately managed within Belfast, however it does not purport to be the only option to accommodate growth within the city. While the LDP seeks to increase residential opportunities through higher densities, this will need careful evaluation across the city and in cases may be achieved without the need for a tall building solution.</p> <p>We acknowledge that there is a role for taller buildings within the city, however in relation to future growth the plan is primarily focussed</p>

## Council response to key issues raised

Main Issue	Council Response
	on increasing densities where appropriate and not necessarily height.
Three respondents suggested that further consideration given to the promotion of well-designed and high quality tall buildings.	<p>The wording of the policy as drafted is considered to address the areas raised. The plan is intended to be read in the round with DES3 being applied in conjunction with other policy areas. This would include DES1 (Principles of Urban Design) which promotes <i>'...new development that is of a high quality, sustainable design that makes a positive contribution to placemaking.'</i></p> <p>Further details in relation to well designed and high quality tall buildings will be included in forthcoming supplementary planning guidance.</p>
Respondents requested that the merits of new taller 'iconic' buildings next to buildings of architectural and historic interest is considered demonstrating both the old and the new.	It is considered that the wording of the policy as drafted addresses the areas raised. Further details in relation to the siting of tall buildings will be included in forthcoming supplementary planning guidance.
Respondent highlighted the need for the reuse of more existing, smaller scale buildings by a large number of developers, which would better spread the physical and economic benefit to the enhancement of streets.	It is considered that the wording of the policy as drafted addresses the areas raised. Further details in relation to the siting of tall buildings will be included in forthcoming supplementary planning guidance.
<p>Anything over the height threshold (35m AOD) should only be exceptionally permitted in the city centre with tall buildings possibly being more acceptable in TQ.</p> <p>With the clearance of the Queen's Island lands for TQ and the vacancy levels still remaining after many years there is an argument to be made that there is no need for tall buildings in Belfast City core at all.</p>	<p>The Council acknowledges that the low lying nature of the city means that it is relatively sensitive to the impact of tall buildings. However the council continues to receive planning applications for tall buildings throughout the city.</p> <p>Policy DES3 sets out good practice placemaking principles that will be considered in the round in the assessment and management of tall buildings. Tall building locational based assessments may form part of the LPP stage of the plan.</p>
The reuse of more existing smaller scale buildings by a larger number of	The adaptive reuse of buildings, where appropriate throughout the city, is an area

## Council response to key issues raised

Main Issue	Council Response
<p>developers could better spread the physical (and economic benefit) and is far more likely to give benefit of enhancement to our streets and our city.</p>	<p>which is promoted within the draft Plan Strategy. The efficient reuse of buildings and sites are referenced within policies DES1, DES2 and in the cases of built heritage policies BH1, BH2, BH3 and BH4. Policy DES3 enables tall buildings to be managed appropriately so as to minimise any adverse impact such buildings may have.</p>
<p><b>Sustainability Appraisal</b></p>	
<p>While supportive of the criteria based policy contained within DES3 several respondents considered there was insufficient evidence in the SA which tested reasonable tall building policies. Respondents asked for the formulation of an evidence base to address the policy and having done so reassess whether there is sufficient evidence to support the policy.</p>	<p>Detailed response included within summary of SA responses.</p>

## Policy DES4 – Advertising and signage

### Summary of Responses

Three respondents provided comments in relation to Policy DES4, comments received included:

- The policy criteria and its consistency with built heritage regional policy highlighted by two respondents.
- Additional supplementary guidance to support the policy was also requested along with some additional policy criteria and justification text.

### Representations received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-UQ-H</a>	Department of Communities – Historic Environment Division

Reference	Respondent
<a href="#">DPS-B-AZ-6</a>	George Best City Airport

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>Comments on policy</b>	
Suggested policy amendment to either policy criteria or justification text that advertising equipment proposed for footways must be positioned to minimise obstruction to pedestrian movement, having regard for people with visual impairments.	The policy criteria is considered to appropriately address the impact of advertising and signage on the amenity through criteria (a) and (d). SPG for advertising and signage will be included as part of forthcoming urban design SPG as referenced within Appendix E.
Suggested policy amendment to include policy criteria that addresses the need for signage at gateway locations in order for the policy to be consistent with the RDS and PPS17.	The policy is considered to provide sufficient scope to address gateway locations throughout the city. SPG for advertising and signage will be included as part of forthcoming urban design SPG as referenced within Appendix E.
Considered that the policy criteria does not cater for the hierarchy of built heritage assets and suggested policy amendments provided to address this issue.	The draft Plan Strategy is to be read in the round and alongside regional policies and is therefore considered to appropriately address the hierarchy of built heritage assets.

## Council response to key issues raised

Main Issue	Council Response
<b>General comments</b>	
One respondent suggested the need for additional SPG for advertising and signage that would be an update of PPS17	SPG for advertising and signage will be included as part of forthcoming urban design SPG as referenced within Appendix E.



## Policy RD1 – New residential developments

### Summary of Responses

Eight respondents made representation in respect of Policy RD1. Of the comments submitted:

- **Support** was expressed for the policy, as it will help ensure high quality residential developments;
- **Changes** were put forward in respect of the policy's introduction;
- The need for the policy to give greater consideration to **good urban design**, rather than poor precedents in the local area;
- A number of comments related **to roads/transport issues**, including a conflict with roads/car parking regulations which prevent sustainable design, provision of cycle parking, accessibility to public transport and walking/cycling infrastructure and the absence of a robust evidence base;
- A number raised issues relating to **open space, which included** the lack of evidence in respect of aspects of private open space and issues of density and potential use of surrounding greenspace with regards to public open space;
- There was a missed opportunity to improve social housing **space standards**, currently emerging from the Department for Communities;
- Criterion G regarding **units wholly to the rear** is confusing and needs to be clarified to ensure planning officers are not overly restrictive in assessing applications and so there is no misinterpretation of the policy;
- Objection to the exclusion of HMO areas as **established residential areas** and in relation to **HMOs** more generally; and
- Miscellaneous comments regarding failure to take account of **POP representations** and in relation to problems with **residential management companies**.
- Concerns were raised in relation to the **sustainability appraisal** process in terms of the use of out-dated information relating to an assessment of transport implications.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent (DPS-B-AF-J)
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (DfI)

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-6R-K</a>	Organisation (DPS-A-6R-K)
<a href="#">DPS-A-63-M</a>	Padraig Walsh
<a href="#">DPS-A-6X-S</a>	Translink

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support for the policy, which will help ensure the development of high quality residential environments.	Support for the proposed policy approach is welcomed.
Amend first paragraph of policy to include 'normally' (i.e. "planning permission will normally be granted for development...") in order to allow for flexibility in the policy. Change needed in instances where it is desired to increase height/density of development where it may be considered to conflict with the character of an area.	The Plan needs to be read as a whole. When read together, the policies contained within the Plan offer sufficient scope/flexibility to instances such as that described by the respondent. For example, Policy HOU4 on the density of development, sets out broad bands take into account variations within character areas, allowing proposals to protect established character. The policy also allows flexibility for proposals outside of the density bands to be considered on their merits.
Policy should give greater consideration to good urban design rather than poor precedents set in local context.	The draft requires proposals to accord with "general urban design policies" (e.g. Policy DES1), as well as the provisions of this policy. Further details on good design solutions will be included within supplementary planning guidance (SPG), proposed in relation to both urban design generally and residential design (see Appendix E of draft Plan Strategy). This is considered sufficient to ensure that good urban design can be taken into account in individual development decisions.
Design aims conflict with roads/car parking regulations. Alignment is required.	The Council does not consider there to be a conflict as suggested. Detailed road regulations are the responsibility of DfI and any challenges that may incur from a design viewpoint will be assessed under design policies (e.g. DES1) which aim to encourage connected high quality proposals. TRAN 8 allows flexibility on parking provision for residential schemes in accessible locations and encourages provision that will assist in reducing reliance on the private car. This can also be addressed in greater detail within the proposed SPG on urban design and residential design.
Cycle parking should be considered for all new build apartment developments, not just those over 30 units.	The threshold associated with apartment development in Policy RD1 reflects the fact that some of the policy requirements are unlikely to be viable for smaller scale developments (e.g. management arrangements, common

## Council response to key issues raised

Main Issue	Council Response
	<p>rooms, etc.). For smaller schemes, the requirement for cycle parking still remains within Regional SPG – ‘Creating Places – Achieving quality in residential developments’ and will be emphasised within the proposed SPG on urban design and residential design.</p> <p>Paragraph 11.03 of ‘Creating Places’ states that communal bicycle stands should normally be provided in association with apartment developments and Paragraph 11.15 adds that communal bicycle stands needed for apartments should be located so that they can be readily seen from front windows and entrances to provide informal surveillance and that they should be well-lit after dark to enhance personal and bicycle security. The SPSS notes at paragraph 1.14 that ‘Creating Places’ will continue to be a material planning consideration following adoption of the Plan Strategy.</p>
<p>How will accessibility and convenience (criterion c) be assessed? This could be addressed within the justification and amplification text. It is suggested that residential development should have sufficient access to public transport if it is within 800 metres or a 10 min walk.</p>	<p>The terms ‘accessibility’ and ‘convenience’ are widely used throughout existing planning policy and as such do not require specific definition in relation to this policy. Inevitably, such policy ‘tests’ often require professional judgement as to whether each individual criterion has been met in a specific instance. Paragraph 7.3.7 of the draft Plan Strategy amplifies these particular concepts and this could be further supported within the proposed SPG, as can clarifying what would be considered a suitable walking distance.</p>
<p>Comments were made in relation to the absence of up-to-date surveys and the use of regional statistics to inform local level question. The formulation of the dPS in advance of DfI plans/strategies was also raised and the need for a robust evidence base.</p>	<p>As there are no site specific proposals associated with this policy, detailed transport or accessibility analysis cannot be carried out at this stage. Under the new two tier LDP process, however, more detailed analysis of transport impacts associated with specific sites will be addressed at the Local Policies Plan (LPP) stage.</p> <p>For further information in relation to role of DfI’s Transport Plans/Strategies and local consideration of transport issues see summary of responses to transport policies (SP7 and TRAN1-TRAN12).</p>
<p>No evidence base given that private open space should provide shelter and privacy.</p>	<p>Reference to these issues is made in Section 7.3.9 of the justification and amplification to the policy and apply to large scale apartment development. It is considered that</p>

## Council response to key issues raised

Main Issue	Council Response
<p>The policy is contradictory in also stating that balconies would be welcome.</p>	<p>the text is flexible in stating that "...private open space should be designed to provide shelter and privacy from neighbouring properties." This statement sets out the preferred approach, but gives cognisance to the fact that there may be instances where this is not wholly achievable.</p> <p>The Council does not consider there to be a policy contradiction in suggesting that balconies are welcome. For example, it is possible for balconies to be internalised or to incorporate partial screening/enclosure.</p>
<p>The provision of large areas of open space does not complement the stated policy of increasing density in and around the city. The policy should also reflect the potential use of greenspace within the surrounding area.</p>	<p>The amplification and justification to the policy states the "amount of open space within residential developments ... is addressed in Policy OS3" (see section 7.3.10). Policy OS3 is flexible in offering exception and relaxation criteria in respect of open space provision. As noted above, Policy HOU4 also allows flexibility for proposals outside of the density bands to be considered on their merits. Policy OS3 also states that "An exception will also be considered in cases where residential development is designed to integrate with and make use of adjoining open space."</p> <p>The Council are therefore content that the density of development and provision of adequate public open space are not in conflict, and that a balance can be achieved between the two.</p>
<p>Missed opportunity to improve social housing space standards or recommend emerging space standards currently set out in draft form by the Department for Communities are of more generous provision including balconies, winter gardens etc.</p>	<p>The space standards contained in Appendix C are based on those within the Housing Association Guide, published by the Department for Communities. The policy requirement to meet these space standards is intended to promote a quality residential environment for residents while achieving appropriate density.</p> <p>The Council are aware that DfC are currently piloting an enhanced set of space standards for social housing. In the light of the comments received, the Council will keep this context under review and will provide updates as appropriate as part of the independent examination.</p>
<p>Criterion G regarding units wholly to the rear is confusing and needs to be clarified.</p>	<p>It is considered that the wording of Criterion G is satisfactory. It aligns closely with wording used in existing planning policy (i.e. Criterion (e) of Policy LC 2 of</p>

## Council response to key issues raised

Main Issue	Council Response
	Addendum to Planning Policy Statement 7: Safeguarding the Character of Established Residential Areas).
<p>Objection to the apparent exclusion of HMO areas (e.g. Stranmillis) as residential areas and does not seek to address residential areas that are primarily of a HMO nature.</p>	<p>The draft Plan Strategy does not specifically identify any residential areas within the City, but instead includes a detailed definition of an established residential area at Appendix B. This definition aligns with the definition of an established residential area, as contained in existing planning policy (i.e. Annex E of the Addendum to Planning Policy Statement 7: Safeguarding the Character of Established Residential Areas) and is considered necessary in order to support proposed policies.</p> <p>It is not intended that the definition would exclude areas that are clearly residential in nature, such as areas where HMOs are now predominant. However, such areas would be subject to stricter controls affecting the established residential character through the requirements of Policy HOU10. See also minor modifications.</p>
<p>The BMAP has failed to address problems of HMOs and achieve balanced communities.</p>	<p>Please refer to the response provided to this issue in the responses to draft Policy HOU10.</p>
<p>Comments made during the POP consultation relating to the need for current zonings to be subjected to accessibility analysis have not been taken fully into account when drafting the Plan Strategy.</p>	<p>Comments raised as part of the POP consultation were taken into account and helped inform the development of the draft Plan Strategy. A full copy of the POP Public Consultation Report is available on the Council's website at: <a href="http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport">http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx#popreport</a>. This includes a summary of all the comments received and the Council's responses to them.</p> <p>In relation to accessibility, although high level analysis has been undertaken as part of the Urban Capacity Study, this will be supplemented by more detailed analysis to help inform the zoning of land as part of the Local Policies Plan process to be undertaken following adoption of the Plan Strategy.</p>
<p>Serious problems with residential management companies need to be addressed and account taken</p>	<p>Problems with the legal structure of residential management companies are issues which lie outside the remit of the LDP.</p>

## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
of a report compiled by the NI Law Commission.	Nevertheless, proposed management arrangements required as a result of this policy will be reviewed and approved in line with best practice. Detailed requirements in this regard will be addressed within the proposed SPG.
Concerns were raised in relation to the sustainability appraisal process in terms of the use of out-dated information relating to an assessment of transport implications.	Detailed response included within summary of SA responses.

## Policy RD2 – Residential extensions and alterations

### Summary of Responses

Two respondents provided comments in relation to Policy RD2, which can be summarised as follows:

- **Support** for the policy as it will help to ensure the protection and amenity of existing residential areas; and
- The policy may be **too lax** in that it does not take account of unlisted buildings with historic character. Policy BH1 was also referenced.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-92-P</a>	Historic Buildings Council

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support for the policy, which will help ensure the protection of the amenity of existing residential areas.	Support for the proposed policy approach is welcomed.
<p>Policy RD2 generally permitting residential extension may be too lax in that it does not take account of unlisted buildings with historic character where permissions will generally need careful examination.</p> <p>Policy BH1 covering listed buildings specifically appears to provide good protection, but experience has shown that such clauses can be interpreted loosely to the detriment of listed buildings. It is important that planning officers and councillors receive training in the principles and detail of conservation. The section on the setting of listed buildings is good, but again much depends on how individual officers interpret "adverse effect" and such like clauses.</p>	<p>All developments within a conservation area, are of townscape character or affecting the setting of a listed building will still be subject to built heritage policies (BH1, BH2, BH3, etc.), as well as Policy RD2. This will ensure adequate consideration is given to the impact on the historic and townscape character. Further guidance will be provided in relation to this as part of the proposed Residential Design Supplementary Planning Guidance (SPG).</p>

## Council response to key issues raised

### Policy RD3 – Conversion or sub-division of existing buildings for residential use

#### Summary of Responses

Six respondents provided comments in relation to Policy RD3, which can be summarised as follows:

- **Support** for the policy, noting that it is a sustainable approach to meeting need whilst preserving heritage and contributing to living over the shops. It was noted that policy should encourage and accommodate the sub-division of larger houses into two good size properties;
- Suggestions for change included,
  - The removal of reference to **“living over the shop”**; and
  - The need for the policy to include good urban design.
- Providing the level of accommodation is generally acceptable there is no justification as to why dwellings below **150 sq m** cannot be subdivided. The threshold should be removed from criterion C.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited
<a href="#">DPS-B-9Q-N</a>	Colin McAuley Planning
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation

Reference	Respondent
<a href="#">DPS-B-8K-E</a>	Department for Communities
<a href="#">DPS-A-QZ-P</a>	Individual (DPS-A-QZ-P)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

#### Main Issue(s) raised by respondent(s) and Belfast City Council’s response

Main Issue	Council Response
The policy represents a sustainable approach to meeting housing need while preserving heritage and contributing to living over the shops. It should help encourage and accommodate the use of larger houses being subdivided into two good size properties. The re-use of existing buildings/larger houses should ensure younger and older people can live alongside each other independently.	Support for the proposed policy approach is welcomed.  The policy should allow sub-divisions of the nature as alluded to by this respondent.
At para 7.3.29, reference is made to "living over the shop", a grant scheme which closed some years ago. This reference	The term "living over the shop" remains in existing planning policy (Policy HS 1 of Planning Policy Statement 12: Housing in



## Council response to key issues raised

Main Issue	Council Response
<p>should be removed on the basis that it falls within the broader aim to facilitate city centre living.</p>	<p>Settlements, is titled 'Living Over the Shop') and use of the term in Section 7.3.29 is intended to be generic rather than referencing an individual grant scheme. Use of the term does not affect the soundness of the Plan. Notwithstanding, see minor modifications.</p>
<p>Policy should reference good urban design, with explanation of how good urban design can be achieved within current road regulations and mechanism for challenging road designs that are restricting schemes.</p>	<p>The issues raised are of more relevance to RD1 and have therefore been addressed within the responses relating to Policy RD1. Policy RD3 requires that proposals meet the provisions of Policy RD1 in addition to the criteria within RD3. This includes reference to general urban design policies.</p>
<p>No justification as to why existing dwellings below 150 sq m cannot be adequately sub-divided into two or three apartments. Concerns around wording of Criterion C in light of PAC decision 2017/A0054. Amend wording of Criterion C to remove 150 sq m figure.</p>	<p>Applications for the sub-division of existing dwellings will be subject to the same space standards as new residential development. The 150 sq m threshold seeks to prevent the sub-division of existing dwellings that are too small to deliver smaller units without negative impacts on existing residential amenity. The threshold of 150 sq m will prevent intensification of areas where smaller units are prevalent, which lack the space to provide the necessary infrastructure to support the increase population.</p>

## Council response to key issues raised

### Policy BH1 – Listed buildings

#### Summary of Responses

Ten respondents made representation in respect of Policy BH1:

- Five respondents find the policy **unsound** and stipulate soundness tests on which they have deemed the policy to have failed, namely: **P2, C1, C3 & CE2**
- Two respondents have not stipulated whether they consider the policy to be sound or unsound but have **recommended changes**
- One respondent was **broadly supportive** of the policy
- The remaining two respondents were **supportive** of the policy

#### Responses received

Reference	Respondent
<a href="#">DPS-B-9X-V</a>	Individual
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-UM-D</a>	Belfast Natural History and Philosophical Society
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>Six respondents have provided comments which suggest that the policy is inconsistent with; conflicts with; or does not take sufficient account of the SPPS, RDS and PPS6.</p> <p>One respondent also indicates a specific conflict between the SPPS and the draft policy regarding demolition of listed buildings, and unlisted buildings in a conservation area; whereby a lesser test would be applied than required by the SPPS. It is also suggested that the relationship between draft Policy BH1 and draft Policy BH2 is unclear.</p>	<p>The draft Plan Strategy is fully aligned to the aims of the RDS and SPPS, and in the case of the draft built heritage policies; the principle aims and objectives of PPS6.</p> <p>The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>The council is satisfied that the wording of the policy and J&amp;A as drafted are sufficient to protect built heritage assets for the purposes of planning, including the demolition of listed buildings and unlisted buildings, and that the policy is sound.</p> <p>With regards the demolition tests for listed buildings, and unlisted buildings in a conservation area (draft Policy BH2); the council is satisfied that both policies as drafted are in line with regional policy, fit for purpose, and suitably clear to demonstrate how the tests for demolition would be applied.</p>
<p>One respondent has provided a comment which suggests that whilst the policy provides good protection for listed buildings, officer interpretation of the policy is important and training is suggested on how to successfully achieve this.</p>	<p>The council is satisfied that the wording of the policy and J&amp;A as drafted are sufficient to protect built heritage assets for the purposes of planning, and are suitably clear to demonstrate how the policy would be applied.</p> <p>The council proactively supports and promotes efficient officer training and interpretation, however these are issues that lie outside the remit of the Plan and do not affect the question of soundness.</p>
<p>One respondent has suggested that the Burra and Nara charters should be cited to provide further guidance.</p>	<p>As this is a strategic policy, the suggested referencing is not considered necessary at this level. The policy wording is sufficient to protect built heritage assets for the purposes of planning.</p>
<p>Four respondents have provided comments noting their support for the policy. The change of use of a listed building is supported providing character remains.</p>	<p>Support for the proposed policy approach is welcomed. The policy specifically requires all development to preserve or enhance the buildings character and architectural or historical interest.</p>

## Council response to key issues raised

### Policy BH2 – Conservation areas

#### Summary of Responses

Eleven respondents made representation in respect of Policy BH2:

- Seven respondents find the policy **unsound** and stipulate soundness tests on which they have deemed the policy to have failed, namely: **C1, C2, C3, C4, P2, CE1, CE2, CE3 & CE4**
- Two respondents have not stipulated whether they consider the policy to be sound or unsound but have recommended **changes**
- The remaining two respondents were **supportive** of the policy.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8G-A</a>	Queen's University Belfast
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-B-UF-6</a>	Ashton Community Trust

Reference	Respondent
<a href="#">DPS-A-HS-6</a>	Agent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent has provided a comment relating specifically to Article 4 Directions; highlighting that there has been no inclusion of Article 4 Directions or local listings and how these should feature in future guidance. Further explanation is needed to explain the application of the demolition test and new development test.	Article 4 Directions and local listings sit outside the remit of the plan, for which independent guidance is available. The detailed criteria set out in the policy as drafted are considered sufficiently clear to demonstrate the tests for demolition and new development.
One respondent has commented that conservation areas are in areas of affluence and therefore deprived areas do not benefit from designations that would help enrich them. Less restriction on deprived areas leads to their visual appearance deteriorating whereas those areas with restriction (conservation areas) are more likely to remain visually attractive.	The criteria for designation of conservation areas, and for selecting areas for designation is set out in separate legislation and thus sits outside the remit of the plan. Furthermore the management of development within deprived areas is not precluded by other policies in the plan.

## Council response to key issues raised

Main Issue	Council Response
	The council is satisfied that the wording of the policy and J&A as drafted are sufficient to protect built heritage assets for the purposes of planning.
One respondent states that the policy is not founded on a robust evidence base which explains the rationale behind the policy triggers and provides a clear understanding on the implications arising from the policy.	<p>The draft Plan Strategy is fully aligned to the aims of the RDS and SPPS, and in the case of the draft built heritage policies; the principle aims and objectives of PPS6. It was determined at the Preferred Options Paper stage that retention of the operational policy approach under PPS6 was the most appropriate course of action to meet plan objectives through this policy. PPS6 forms part of a robust evidence base which underlies the plans and was compiled to ensure plan soundness, and directly informed the wording of this policy and J&amp;A.</p> <p>The council is satisfied that the policy as drafted is sufficient to protect built heritage assets for the purposes of planning. It addresses all key areas of planning control, and the policy wording is consistent with statutory requirements.</p>
One respondent has suggested that the policy does not allow sufficient flexibility in regards to demolition that could hamper the delivery of large complex sites.	The council is satisfied that the wording of the policy and J&A as drafted are sufficient for protecting built heritage assets and demonstrating how the policy would be applied, and are consistent with regional policy. The demolition of unlisted buildings in conservation areas should only be allowed in exceptional circumstances, and the policy clearly details where this may be considered acceptable, regardless of the size of the site in question.
Four respondents have provided comments which suggest that the policy is inconsistent with the SPPS, and that there needs to be a consistent linkage with the justification and amplification.	The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity exists to strengthen policy or identify

## Council response to key issues raised

Main Issue	Council Response
	<p>specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p> <p>The draft policy and J&amp;A are fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6. The council is satisfied that the wording is sufficient to protect built heritage assets for the purposes of planning, and considers the policy sound.</p>
<p>One respondent highlighted that the recording of buildings in regards to demolition is not a requirement in the SPPS, therefore the policy does not take account of regional policy.</p>	<p>The SPPS is high level and does not necessarily provide all of the operational tools that are required to determine planning applications. The role of the draft Plan Strategy is not to duplicate or replicate the SPPS; rather it should align to its core principles and aims. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p> <p>Whilst recording of unlisted buildings in conservation areas was not a specific requirement of SPPS, it was required through operational policy of PPS6. In line with the council's statutory duty to protect and preserve heritage assets, it is considered that where a building is identified to have historical interest but also has sufficient policy support for demolition, its recording for historical purposes is appropriate. As such the draft policy fully aligns to the aims of the RDS, SPPS, regional policy and guidance, and is considered sound.</p> <p>See also minor modifications.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Two respondents have stated their support for the policy, with one noting that all the Built Heritage policies will protect and enhance a sense of place</p>	<p>Support for the proposed policy approach is welcomed.</p>
<p>One respondent has suggested that the policy is weak as it reduces the previous number of policies relating to archaeology and the built heritage, removing general criteria and weakening the policy. Furthermore, the respondent suggested that to lead with the wording '<i>permission will be granted</i>' may suggest weighting towards approval, before the policy is even detailed.</p> <p><i>The respondent also submitted the same comments under draft Policies BH3, BH4 and BH5.</i></p>	<p>It was determined at the Preferred Options Paper stage that retention of the operational policy approach under PPS6 was the most appropriate course of action to meet plan objectives through this policy.</p> <p>This does not mean that the draft Plan Strategy should specifically duplicate the volume or wording of previous policies; rather it should align to their core principles and aims, and be fit for purpose in protecting built heritage assets.</p> <p>The draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6; and identifies the minimum expectations required to support the granting of planning permission.</p>

## Council response to key issues raised

### Policy BH3 – Areas of townscape character

#### Summary of Responses

Eight respondents made a representation in respect of Policy BH3:

- Five respondents find the policy **unsound** and stipulate soundness tests on which they have deemed the policy to have failed, namely: **CE1, CE2, CE3, CE4, C3 & P4**
- One respondent was **broadly supportive** of the policy
- The remaining two respondents were **supportive** of the policy

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-8G-A</a>	Queen's University Belfast
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-B-UW-Q</a>	Individual

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Two respondents have provided comments suggesting amendments to the draft policy. Comments highlight that the wording and inclusion of " <i>Where demolition consent is granted this will be conditional on prior agreement for the development of the site, including prohibition of demolition until contracts have been signed for the approved redevelopment of the site</i> " is an onerous test and request its removal from the policy.	The draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS, PPS6 and other relevant policies within the plan.  Demolition will only be allowed under specific circumstances, which are sufficiently demonstrated within the policy and J&A. Removal of the tests would be inconsistent with regional policy and other policies within the plan.  See also minor modifications.
Two respondents have provided comments suggesting rewording to allow for flexibility with regards to ATC'S, such as in City Corridor areas, whilst the referral to listed buildings within BH3 should be removed	The detailed policy criteria as drafted are considered necessary to ensure that new development maintains or enhances the overall character of an area, and respects its built form. Where this may be in a city



## Council response to key issues raised

Main Issue	Council Response
<p>given that it is covered within its own policy.</p>	<p>corridor, an increase in density and height is not precluded by the policy requirements.</p> <p>The reference to listed buildings is necessary as the policy refers to applications affecting all buildings within an ATC. The plan must be read as a whole, and proposals for a listed building in an ATC would be assessed under both policies. The policy is fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6.</p>
<p>One respondent has provided a comment in relation to designations. It has highlighted that within the policy there has been no attempt to designate ATC's under the plan and that no assessment has been made of existing ATC'S and the potential to designate them as Conservation Areas.</p>	<p>The criteria for designation of ATC's and conservation areas, and for selecting areas for designation is set out in separate legislation and thus sits outside the remit of the plan.</p> <p>The purpose of the built heritage policies are to protect current ATC's and conservation areas, in line with regional policy and guidance. The location and clarification of existing areas will be provided in the forthcoming, site-specific Local Policies Plan document.</p>
<p>Two respondents have provided comments which indicate that the policy is inconsistent with the SPPS.</p>	<p>The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p> <p>The council is satisfied that the draft policy is fully aligned to the principle aims and objectives of the SPPS, and is sufficient to protect built heritage assets.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>One respondent has commented on supplementary guidance. The policy highlights that development is to have regard to relevant supplementary planning guidance, however, the respondent is unclear what this supplementary guidance is.</p>	<p>Supplementary Guidance will be produced at a later stage of the plan. It is therefore not possible to clarify which guidance it relates to at this stage.</p>
<p>Two respondents have confirmed their support for the policy. Particular support was noted for all built heritage policies as they will protect and enhance a sense of place.</p>	<p>Support for the proposed policy approach is welcomed.</p>
<p>One respondent has suggested that the Built Heritage policy is weak as it reduces the number of policies relating to archaeology and the built heritage, removing general criteria and weakening the policy. Furthermore, the respondent suggested that to lead with the wording '<i>permission will be granted</i>' may suggest weighting towards approval, before the policy is even detailed.</p> <p><i>The respondent also submitted the same comments under draft Policies BH2, BH4 and BH5.</i></p>	<p>It was determined at the Preferred Options Paper stage that retention of the operational policy approach under PPS6 was the most appropriate course of action to meet plan objectives through this policy.</p> <p>This does not mean that the draft Plan Strategy should specifically duplicate the volume or wording of previous policy; rather it should align to their core principles and aims, and be fit for purpose in protecting built heritage assets.</p> <p>The draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6; and identifies the minimum expectations required to support the granting of planning permission.</p>

## Policy BH4 – Works to grounds affecting built heritage assets

### Summary of Responses

Six respondents made a representation in respect of Policy BH4:

- Three respondents find the policy **unsound** and stipulate soundness tests on which they have deemed the policy to have failed, namely: **C1, C3 & CE2**
- One respondent finds the policy **unsound** but does not stipulate the soundness tests on which they have deemed the policy to have failed
- The remaining two respondents were **supportive** of the policy

### Responses received

Reference	Respondent
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-A-HS-6</a>	Agent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Two respondents have suggested that the current wording and of the draft policy differs from SPPS and other heritage policies, which renders the plan unsound. A number of suggestions have been made for specific wording and phrases to be amended, removed or included to address this.	<p>The council is satisfied that the draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6, and is sufficient to protect built heritage assets for the purposes of planning.</p> <p>The role of the draft Plan Strategy is not to duplicate or replicate the SPPS; rather it should align to its core principles and aims. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p>
One respondent has suggested that there is conflict between the title of the policy, the definition of built heritage assets and its justifications and amplification, and does not take sufficient account of RDS RG11 and SPPS; notably 6.1, 6.16 and 6.17.	The wording of the policy and the J&A as drafted are considered sufficiently clear to demonstrate their alignment to the RDS, SPPS and PPS6. They do not need to duplicate text, rather they should endorse

## Council response to key issues raised

Main Issue	Council Response
	<p>and promote the core principles and expectations for development.</p> <p>RDS RG11 seeks to conserve, protect and, where possible, enhance our built heritage and our natural environment.</p> <p>SPPS 6.1 refers to the general principles and importance of archaeology and built heritage assets.</p> <p>SPPS 6.16 and 6.17 refer to development affecting historic parks, gardens and demesnes, which is addressed under draft Policy BH6.</p>
<p>One respondent has noted that Rural Heritage Assets (RHA's) are not referenced and should be included.</p>	<p>The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p>
<p>Two respondents have confirmed their support for the policy. Particular support was noted for all built heritage policies as they will protect and enhance a sense of place.</p>	<p>Support for the proposed policy approach is welcomed.</p>
<p>One respondent has suggested that the Built Heritage policy is weak as it reduces the number of policies relating to archaeology and the built heritage, removing general criteria and weakening the policy. Furthermore, the respondent suggested that to lead with the wording '<i>permission will be granted</i>' may suggest weighting towards approval, before the policy is even detailed.</p>	<p>It was determined at the Preferred Options Paper stage that retention of the operational policy approach under PPS6 was the most appropriate course of action to meet plan objectives through this policy.</p> <p>This does not mean that the draft Plan Strategy should specifically duplicate the volume or wording of previous policy; rather it should align to their core principles and aims, and be fit for purpose in protecting built heritage assets.</p>

## Council response to key issues raised

Main Issue	Council Response
<i>The respondent also submitted the same comments under draft Policies BH2, BH3 and BH5.</i>	The draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6; and identifies the minimum expectations required to support the granting of planning permission.

## Council response to key issues raised

### Policy BH5 – Archaeology

#### Summary of Responses

Four respondents made representation in respect of Policy BH5:

- One respondent found the policy **unsound** and stipulates a soundness tests on which they have deemed the policy to have failed, namely: **C1** & **C3**
- Two respondents found the policy **unsound** but they have not stipulated the soundness tests on which they have deemed the policy to have failed
- The remaining respondent was **supportive** of the policy

#### Responses received

Reference	Respondent
<a href="#">DPS-B-99-W</a>	Historic Monuments Council
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-9H-C</a>	Ulster Architectural Heritage

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent has suggested that the draft policy is not consistent with SPPS and RDS. General wording and phrasing between the draft policy and regional policy render the plan unsound; and a number of suggestions have been made for specific wording and phrases to be amended, removed or included to address this.	<p>The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p> <p>The council is satisfied that the draft policy is fully aligned to the core principles and aims of these and PPS6, and is sufficient to protect built heritage assets.</p>
One respondent has highlighted that the policy has failed to recognise ASAI's as per PPS6 and the SPPS.	The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity

## Council response to key issues raised

Main Issue	Council Response
	exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.
Two respondents have confirmed their support for the policy. Particular support was noted for all built heritage policies as they will protect and enhance a sense of place.	Support for the proposed policy approach is welcomed.
<p>One respondent has suggested that the Built Heritage policy is weak as it reduces the number of policies relating to archaeology and the built heritage, removing general criteria and weakening the policy. Furthermore, the respondent suggested that to lead with the wording '<i>permission will be granted</i>' may suggest weighting towards approval, before the policy is even detailed.</p> <p><i>The respondent also submitted the same comments under draft Policies BH2, BH3 and BH4.</i></p>	<p>It was determined at the Preferred Options Paper stage that retention of the operational policy approach under PPS6 was the most appropriate course of action to meet plan objectives through this policy.</p> <p>This does not mean that the draft Plan Strategy should specifically duplicate the volume or wording of previous policy; rather it should align to their core principles and aims, and be fit for purpose in protecting built heritage assets.</p> <p>The draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS and PPS6; and identifies the minimum expectations required to support the granting of planning permission.</p>

## Council response to key issues raised

### Policy BH6 – Parks, gardens and demesnes of special historic interest

#### Summary of Responses

Five respondents made representation in respect of Policy BH6:

- Three respondents find the policy **unsound** and stipulate soundness tests on which they have deemed the policy to have failed, namely: **C1**, **C3** & **CE3**
- The remaining respondents were **supportive** of the policy

#### Responses received

Reference	Respondent
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-9M-H</a>	Belfast Civic Trust
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Three respondents have provided comments which indicate that the policy is inconsistent with and has a different emphasis from regional policy. This is primarily as a result of general wording and phrasing, and various suggestions have been put forward to address this.	<p>The role of the draft Plan Strategy is not to duplicate or replicate precise wording of policy in SPPS, rather it should align to its core principles and aims and ensure they can be achieved at local level through the planning process. Where the opportunity exists to strengthen policy or identify specific needs that are bespoke to the Belfast area, the council will do so where it is considered appropriate and justified.</p> <p>The council is satisfied that the draft policy is fully aligned to the principle aims and objectives of the RDS, SPPS, PPS6 and other relevant policy, and is sufficient to protect natural heritage assets for the purposes of planning.</p>
Two respondents have confirmed their support for the policy. Particular support was noted for all built heritage policies as they will protect and enhance a sense of	Support for the proposed policy approach is welcomed.



**Council response to key issues raised**

<b>Main Issue</b>	<b>Council Response</b>
place. Support was also noted for the design policies and the restriction on tall buildings. The remainder of the plan is considered excellent.	

## Council response to key issues raised

### Policy CGR1 – Community cohesion and good relations

#### Summary of Responses

11 respondents provided representations in relation to Policy CGR1, which can be summarised as follows:

- General **support** for the policy, highlighting the importance of addressing community cohesion and good relations is imperative to the sustainable development of Belfast and welcoming the commitment of the Council to this 'whole of place, whole of community' and advancing the shared housing agenda;
- Suggestion that criteria a) on involvement of communities and b) relating to supporting initiatives to remove peace infrastructure and territoriality of the proposed policy jar with the pre application **community consultation** requirements set out in The Planning Act (Northern Ireland) 2011;
- Reword criterion c) on **physical barriers and connectivity** to better reflect SPPS requirements;
- There is no **evidence** within the technical supplements to support the policy position or information that alternatives were considered;
- A number of comments related to the **delivery/approach** in terms of the opportunity for collaboration in creating new solutions to hard issues, with specialist advice to ensure an integrated approach;
- In the location of new housing, account needs to be taken of **demographic change** and how it will impact regeneration/ development in city centre and surrounding area;
- Development of an agreed **checklist**, through consultation, to test how new developments can contribute to the creation of shared space; and
- There is no mention of **HMOs** within community cohesion and good relations policy, despite the impact in terms of aggravation and division. Other comments were also made relating to HMOs more generally and these are addressed more fully in the Section relation to Policy HOU10 Housing Management Areas (HMAs).

#### Responses received

Reference	Respondent
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-8K-E</a>	Department for Communities
<a href="#">DPS-B-9G-B</a>	Falls Community Council
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-UK-B</a>	Markets Development Association

Reference	Respondent
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-A-63-M</a>	Padraig Walsh
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-9D-8</a>	Shared City Partnership

## Council response to key issues raised

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>General support for the policy, highlighting the importance of addressing community cohesion and good relations is imperative to the sustainable development of Belfast and welcoming the commitment of the Council to this 'whole of place, whole of community' and advancing the shared housing agenda</p>	<p>Support for the proposed policy approach is welcomed.</p>
<p>Criteria a and b should be deleted, as the proposed policy jars with the pre application community consultation requirements set out in The Planning Act (Northern Ireland) 2011.</p>	<p>Section 27(1) of the Planning Act (Northern Ireland) 2011 provide provisions for pre-application community consultation applicable for a major development. Section 27(2) of the same legislation requires a 'Proposal of Application Notice' (PAN) to the Council indicating how you will carry out consultation before submitting the formal application. This provides an opportunity for the Council to provide further requirements in relation to consultation in addition to the statutory minimum requirements. There is therefore no legislative conflict in relation of requirements for consultation over and above the statutory minimum in certain circumstances.</p> <p>The SPPS requires that LDPs should take account of any 'good relations' policies of the Council, where relevant. The Council's Draft Belfast Good Relations Strategy states that "we need to facilitate opportunities for communities to take part in exercises that bring their voices to the fore." Policy CGR1 therefore requires that "affected communities are involved from the outset and throughout the design process, with opportunities provided for cross-community conversations in a safe and inclusive environment". The Council are therefore content that Criterion a) aligns with both legal and policy requirements.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>The responses seem to provide no further justification for the deletion of criterion b) relating to supporting initiatives to remove peace infrastructure and territoriality. This is considered best practice in relation to the regeneration of contested spaces and the Council are content that it also offers no conflicts with policy and legislation.</p> <p>Further advice in relation to the implementation of this policy can be provided through proposed SPG on community cohesion (see Appendix E).</p>
<p>Criterion c) on physical barriers and connectivity should be reworded to better reflect good planning principles and paragraph 4.17 of the SPPS.</p>	<p>The SPPS acknowledges that the Together: Building a United Community (TBUC) strategy includes a goal that all interface barriers will be removed by 2023. This is also acknowledged in the justification and amplification to Policy CGR1. Criterion b) seeks to support the goal set in the TBUC strategy. In addition to this, the policy seeks to ensure that developments are not delivered in a way that creates, either intentionally or unintentionally, new or perceived barriers through the broader layout of development and associated infrastructure. The Council would therefore consider the proposed rewording would weaken the policy in this respect.</p>
<p>There is no evidence within the technical supplements to support the policy position or information that alternatives were considered.</p>	<p>Three scenarios were considered as part of the POP, which are documented within the Interim Sustainability Appraisal. The preferred option, which involved the inclusion of an over-arching strategic policy within the Plan Strategy to encourage all new developments to promote community cohesion and make a positive contribution to good relations, received very strong support during public consultation. The POP also noted that this would then be supported by site-specific guidance for key locations</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>through the Local Policies Plan or subsequent SPG.</p> <p>Alongside the Strategic Policy SP4, CGR1 was therefore developed to provide more specific guidance alongside the strategic direction. However, as noted above, further advice in relation to the implementation of this policy will be provided through the proposed SPG on community cohesion.</p>
<p>Opportunity for collaboration in creating new solutions to hard issues and linking new developments (e.g. university campus) with specialist advice around good relations and equality implications.</p>	<p>Policy CGR1 seeks to support development that maximises opportunities to build strong, cohesive communities and that makes a positive contribution to good relations. It sets a key principle through criterion a) that affected communities are involved from the outset and throughout the design process, with opportunities for cross-community conversations in a safe and inclusive environment.</p> <p>The Council would welcome the opportunity to involve a range of partners and stakeholders in relation to these issues, including those able to provide specialist advice on community cohesion, good relations and equality and diversity. As noted above, further advice in relation to the implementation of this policy can be provided through proposed SPG.</p>
<p>In the location of new housing, account should be taken of demographic changes and how these will drive regeneration in the city centre and surrounding areas.</p>	<p>The council considered demographic profile changes as evidenced by Technical Supplement 1 and it is acknowledge that more up-to-date data will be available following the Census 2021.</p> <p>The zoning of land for housing is a statutory requirement and one which will ensure a planned approach to future housing delivery, which is appropriate to ensure infrastructure and services can also be effectively planned. The location of land for housing and its</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>relationship with social housing need will be considered in detail as part of the subsequent Local Policies Plan (LPP) process.</p> <p>It is accepted that Belfast has a range of challenges associated with single identity areas of social housing and Policies SP4 and CGR1, alongside the pursuit of mixed tenure, tenure blind housing developments (see Policy HOU5) are all intended to help proactively address some of these challenges. However, the Council acknowledge the need for collaboration with all stakeholders in respect of delivering affordable housing where it is needed.</p>
<p>An agreed checklist could have been developed to test how new developments can contribute to the creation of shared space.</p>	<p>Policy CGR1 refers to the need for an accompanying statement demonstrating how the key principles of the policy have been addressed. The contents of this statement can be further expanded upon as part of subsequent SPG, which could include the development of a self-assessment tool or checklist.</p>
<p>There is no mention of HMOs, despite their impact in terms of aggravation and division</p>	<p>Whilst Strategic Policy SP4 sets an overall aspiration to build strong, cohesive communities, in relation to HMOs this is addressed through the provision of Policies HOU10, HOU11 and HOU12. For more information in relation to this, please see responses provided in the section of this report relating to draft Policy HOU10: Housing Management Areas.</p>

## Council response to key issues raised

### Policy CGR2 – Meanwhile uses in interface areas

#### Summary of Responses

Two respondents provided comments in relation to Policy CGR2. Both expressed **support** for the policy.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8K-E</a>	Department for Communities

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The policy, along with Policy CGR1, was welcomed as part of a 'whole of place, whole of community' approach. The Council's commitment to improving good relations and promoting/advancing the shared housing agenda was also welcomed. The innovative nature of the two CGR policies was also noted.	Support for the proposed policy approach is welcomed.

## Council response to key issues raised

### Policy HC1 – Promoting healthy communities

#### Summary of Responses

Eleven respondents provided comments in relation to **policy HC1**. Of the comments submitted:

- Two respondents are in full support of the policy;
- Three respondents state general support but seek the removal of the final paragraph of the policy omitting the need for section 76 planning agreements and relying on planning conditions alone;
- One respondent strongly agrees that the LDP can promote a healthy city, including through policies that support active travel and provide access to open space;
- One respondent states that the policy should require a Health Impact Assessment (HIA) for all major developments;
- One respondent states that HIA is a further unrealistic requirement – as this already considered in site zoning/designation or through EIA proposals;
- One respondent states the benefit of the historic environment to health benefits;
- One respondent raises questions over the effectiveness of HIA and to remove requirement for HIA from HC1 – particularly for allocated sites;
- One respondent queries how accessibility will be assessed in planning process.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-A-HS-6</a>	Agent
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Roads, Public Transport Division, Safe and Sustainable Travel Division)
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-A-6R-K</a>	Organisation

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Mechanisms for assessing health and wellbeing lacking in policy,	BCC consider that (Health Impact Assessment) HIA is not appropriate for all major developments. However the policy will allow for HIA where there is potential for significant



## Council response to key issues raised

Main Issue	Council Response
particularly in relation to major developments	adverse effect on health and wellbeing. The use of Section 76 Planning Agreements is an option for development management purposes and maybe used where appropriate to secure facilities or funding contributions. Further clarity on Section 76 Planning Agreements is in the councils Developer Contributions Framework (DCF) and future SPG would provide additional guidance.
Remove HIA requirement - already considered in site designation or EIA proposals.	Issue not agreed by BCC. It is accepted that the (Environmental Impact Assessment (EIA) process includes populations and health issues. However EIA normally only applies to large scale developments over statutory thresholds. The HIA process is separate to an EIA and would identify any health issues that may arise from non EIA development.
The policy questions effectiveness of HIA.	These matters mainly relate to the implementation of policy through the development management process. Where a HIA or Section 76 Planning Agreement is required, these will be a requirement prior to decision and will be enforceable after.
Should acknowledge the community health benefits of historic buildings.	The DPS recognises the importance of historic buildings and other policies relate to this matter. The DPS should be read in its entirety and it is not necessary to duplicate specific policy provisions throughout the document.
Queries how the accessibility will be assessed.	Accessibility and other locational matters are considered as part of the Development Management (DM) process. In addition, accessibility will be a consideration in zoning land at the LPP stage. This may include consideration of existing travel options and may require enhanced provision or travel plans. These matters will be referred to Dfl for advice as part of the LPP and DM process.

## Supportive- Site related

Comments	Council Response
Three respondents were supportive of the policy. However each separately referred to site specific sites- Laburnum Park Lands, Ballygowan Road and Glenmona and Barnfield Road	Welcome support. BCC notes that these submissions relate to specific sites and the future zoning of this site will be considered at the LPP stage.

## Council response to key issues raised

### Policy CI1 – Community infrastructure

#### Summary of Responses

**Seven** respondents provided comments in relation to **policy CI1**. Of the comments submitted:

- Three respondents find the policy sound and are broadly supportive. However, they state that Section 76 Planning Agreements are not appropriate and that appropriately worded planning conditions would be a much more efficient method;
- One respondent, while supporting the policy, stresses the need for ongoing consultation and engagement;
- One respondent strongly agrees with elements of the policy such as "no unacceptable impact on residential amenity or natural/ built heritage" and "presumption against the development of existing community infrastructure";
- One respondent is seeking changes to the developers contributions process to be negotiated pre-application and with the residents of the area;
- One respondent requires a new approach needed as community and green & blue infrastructure is under resourced and questions whether Section 76 Planning Agreements work.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-A-QT-G</a>	Sandy Row Community Forum
<a href="#">DPS-B-UN-E</a>	Kilmona Holdings Limited

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-A-6R-K</a>	Organisation

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Developer's contributions to be negotiated pre-application with the residents of the area.	The council's DCF sets out where developer contributions may be sought and these must be necessary to allow grant of planning permission. The development management process facilitates engagement with local residents who may be impacted by proposed developments. This includes the PAN process where communities have the opportunity to engage with the

## Council response to key issues raised

Main Issue	Council Response
	developer in relation to the community benefits as set out in the SPPS.
The policy does not quantify what 'sufficient access' to facilities means which leaves the policy open to interpretation by developers and planners alike. Community Infrastructure should have sufficient access to public transport	BCC does not agree that specific accessibility standards should be stated in the policy as each case is determined on its own merits. However the dPS aims to approve accessibility throughout the city and enable development at appropriate and accessible locations. Future SPG will provide further guidance. In addition the LPP stage will allow spatial consideration of community infrastructure requirements in consultation with stakeholders and the public.
Community and G&B Infrastructure under resourced	These matters mainly relate to the implementation of policy through the development management process and subsequent project implementation. This is outside the scope of the dPS. Nevertheless, where a Section 76 Planning Agreement is required, this will required to be agreed prior to decision making and will be enforceable after. The new LDP policies emphasise the importance of positive place making and these will be reflected in future decision making.
Supports policy, however believes there is a time lag between people moving into a development and the provision of community facilities.	Welcome support and acknowledge comments in relation to phasing of community infrastructure. This mainly relates to the implementation of policy through the development management process and subsequent project implementation. The DCF and future SPG will provide further guidance on this. In addition the LPP may consider community infrastructure as part of any KSR or future masterplans.

## Supportive- Site related

Comments	Council Response
Three respondents are supportive of the policy. Each separately referred to site specific sites - Laburnum Park, Ballygowan Road and Glenmona and Barnfield Road	Welcome support. BCC also notes that this submission relates to a specific site and the future zoning of this site will be considered at the LPP stage. The use of Section 76 Planning Agreements is an option for development management purposes and may be used where appropriate to

## Council response to key issues raised

Comments	Council Response
	secure facilities or funding contributions. Further clarity on Section 76 Planning Agreements is in the councils DCF and future SPG will provide additional guidance.

**Policy CI2 – Cemeteries and crematoria****Summary of Responses**

No representations have been made in respect of the Policy CI2.

## Council response to key issues raised

### Policy EC1 – Delivering inclusive economic growth

#### Summary of Responses

Six respondents provided comments in relation to Policy EC1. Of the comments submitted:

- One respondent suggested further detail is required on what constitutes “normal planning considerations”.
- One respondent raised concerns regarding existing Waste Water Treatment Works (WWTW) capacity constraints;
- One respondent commented that the LDP is a key enabler for sustainable economic growth.
- Another respondent recommended re-wording the policy re-wording to include the retail sector.
- One respondent asserts that care is required to ensure that the rate of development keeps pace with the skills of our citizens;
- One respondent highlighted that tourism growth is not fully aligned with the principles of sustainable tourism as defined in the SPPS.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-1R-E</a>	Forward South Partnership
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-9D-8</a>	Shared City Partnership
<a href="#">DPS-B-A5-1</a>	The National Trust

#### Main Issue(s) raised by respondent(s) and Belfast City Council’s response

Main Issue	Council Response
Further detail is required on what constitutes “normal planning considerations”.	BCC disagrees with this issue raised. Similar terms used within SPPS.
Must consider existing wastewater capacity constraints	BCC is aware of existing wastewater capacity constraints within the city. That being said any perceived lack of future capacity should not stymie the sustainable growth aspirations and needs of the city. Any future development proposals will be subject to normal assessment, including the capacity of infrastructure, and will be assessed in consultation with NI Water in terms of specific initiatives such as Sustainable Urban Drainages Systems (SuDs). As the statutory undertaker it is

## Council response to key issues raised

Main Issue	Council Response
	<p>within their remit to provide the wastewater capacity required for Northern Ireland.</p> <p>If necessary, land may be phased to ensure alignment of employment delivery with planned infrastructure investment and development lead-times.</p>
<p>Remove barriers to accessing employment within LDP to promote economic prosperity</p> <p>The Plan should recognise and provide opportunities for community and social enterprise.</p>	<p>The removal of barriers to accessing employment is considered to be a site specific comment and as such will be dealt with at next stage of the plan process – LLP, where site specific designations will be considered.</p> <p>There is a statutory requirement for the plan to be developed in the context of the three pillars of sustainability with consideration given to the impact policies will have, not only to the economy but also on social and environmental considerations.</p> <p>In terms of opportunities for community and social enterprise, the plan seeks to achieve balanced economic growth across the city, through the inclusion of a number of facilitative policies which enable the provision of such social and environmental infrastructure that may arise during the plan period. There are also a number of work streams that are coming through the Belfast Agenda that support community and social enterprise.</p> <p>Any specific land use requirements arising in relation to social and environmental infrastructure will also be addressed, where known, as part of the subsequent LPP.</p> <p>The request for the council to recognise and provide opportunities for community and social enterprise is noted. BCC considers that recognition has been given to this sector through the community cohesion and good relations policies, the promoting healthy communities policies as well as through the creating a vibrant economy policies.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Implementation requires collaborative approach between private/public sector, local communities &amp; investors</p>	<p>Whilst much of the Plan Strategy will be delivered through the determination of planning applications, it is important to recognise that the council cannot deliver the objectives of the LDP alone. This is particularly true in the Belfast context where many of the key functions required to deliver physical development, such as regeneration powers, housing strategy, transport and infrastructure planning and encouraging inward investment, are outside the remit of the council. It will therefore be necessary for a number of external partners to play a part in the implementation of the Plan Strategy, including government departments and agencies, other public sector bodies, developers, landowners, investors and some local voluntary groups.</p> <p>In its community planning role, the council will work with key partners to ensure that the LDP is effectively implemented and able to contribute to the overarching vision for the city. As set out in the Belfast Agenda, this will require new thinking in terms of collaborative planning, financing, data collection, performance management and project delivery. We will look for complementary opportunities to work with our partners, in terms of resourcing and project delivery.</p>
<p><b>Change:</b> Add retail to the sixth bullet point as follows:</p> <ul style="list-style-type: none"> <li>• Retail, Hospitality and Tourism</li> </ul>	<p>BCC does not agree with the change request. Whilst it is acknowledged that the retail function drives footfall and enhances the vitality and vibrancy of the city / city centre it is considered that in order to maintain the viability of the city centre, retail proposals will be assessed under retail specific policies RET1-RET6. This suite of retail specific policies have been produced to specifically address current and future retailing needs over the plan period.</p>
<p>Ensure that rate of development keeps pace with skills of citizens to ensure inclusive growth and this will require proactive programming from an economic development perspective.</p>	<p>The LDP is the spatial articulation of the Belfast Agenda. The Council aims to have the right amount of employment land available and in the right locations over the plan period to ensure successful inclusive economic growth. Monitoring and reviewing will form part of the plan process to</p>



## Council response to key issues raised

Main Issue	Council Response
	ensure that an appropriate supply of land will be maintained throughout the plan period, with reviews of policy and allocation where necessary. Proactive programming falls outside the remit of the LDP and can only be achieved through a multi-agency, multi-stakeholder approach.
Support policy. Any tourism growth must be fully aligned with SPPS principles of sustainable tourism.	BCC notes the comments of support. Whilst EC1 acknowledges the need to mitigate against future environmental issues for economic development, TLC2 contains further policy advice in relation to tourism assets. TLC2 aims to protect existing tourism assets from being adverse effected by new development, in line with the requirements of paragraph 6.254 of the SPPS.

**Policy EC2 – Employment land supply**

**Summary of Responses**

Eight respondents provided comments in relation to Policy EC2. Of the comments submitted:

- A number of respondents made comments in relation to the evidence base. They have stated that it is either: not substantiated; not robust enough; they question the methodology; or suggest that an updated evidence base is required;
- One respondent highlighted an oversupply of employment lands;
- Another respondent commented about the lack of an Employment Land Evaluation Framework;
- One respondent commented that the continued retention of lands at Montgomery Road as a zoned employment site cannot be sustained; and
- One respondent seeks clarification as to whether the quantum within this policy relate to developable land or employment floor space.

**Responses received**

Reference	Respondent
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure - Strategic Planning Directorate

Reference	Respondent
<a href="#">DPS-B-AV-2</a>	Heron Bros
<a href="#">DPS-A-6E-6</a>	Invest Northern Ireland
<a href="#">DPS-B-8E-8</a>	Pragma Planning and Development Consultants Ltd
<a href="#">DPS-B-AB-E</a>	Retail NI

**Main Issue(s) raised by respondent(s) and Belfast City Council's response**

Main Issue	Council Response
<p><b>Evidence not substantiated</b></p> <p>1. Concern regarding approach taken in Urban capacity study. Evidence not substantiated.</p>	<p>1. BCC disagrees with this issue. BCC is satisfied that the approach taken in the Urban Capacity Study follows an accepted methodology. In order to meet the requirements of the Strategic Planning Policy Statement (SPPS) the report is based around the 5 broad stages set out in the planning practice guidance for England and Wales, which provides useful information on the process for undertaking Housing</p>

Main Issue	Council Response
<p>2. Misplaced assumption that committed sites will be developed over plan period.</p> <p>3. Inaccuracies in the recording of committed site employment yields.</p> <p>4. Cannot appraise extent to which supply could be developed to meet needs of different types of businesses.</p>	<p>and Employment Land Availability Assessments (HELAA). These five stages are:</p> <ul style="list-style-type: none"> <li>• Stage 1: Sites identification</li> <li>• Stage 2: Sites assessment</li> <li>• Stage 3: Windfall assessment</li> <li>• Stage 4: Assessment review (including indicative trajectory)</li> <li>• Stage 5: Final evidence base.</li> </ul> <p>2. Whilst it is accepted that committed sites may or may not be developed over the plan period, these sites do, however, give an indication of the amount of employment space available. They also represent a lawfully assessed and statutory commitment to the development of any given site.</p> <p>3. The floor space figures quoted in the office sector report are at a point in time. BCC is satisfied that the methodology and findings of the committed site employment yields are robust.</p> <p>4. The draft policies set out the locations where different types of employment use are considered acceptable. At the next stage of the plan process BCC may come forward with key site requirements in respect to some of the larger employment zonings. Outside of that the onus will be on the applicant to determine the type of development suitable on any particular site having regard to the dPS.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>5. Build-out rates takes no account of specific requirements for different types of employment space</p>	<p>5. The figure of 550,000 sq. is the total amount of employment floor space required over the plan period. BCC considered it too prescriptive at the dPS stage to break down this total into the various B use classes. In many ways it would not be desirable to provide a further breakdown of these use classes. Setting aside the reliability of the data, what would be gained from being more prescriptive. This could potentially lead to overly restrictive policies.</p>
<p>6. Limiting provision would not support more than 25,000 additional jobs over plan period.</p>	<p>6. The council does not agree with the assertion that "Limiting provision to level proposed would not support more than 25,000 additional jobs over plan period". The growth aspirations represents the council's commitment to population and jobs growth set out in the Belfast Agenda, which is ambitious and capitalises on the role of Belfast as the driver of the regional economy. The level at which this is set is based on limited infrastructure and capacity along with the robust evidence provided in the Housing Growth Options report.</p>
<p>7. Unclear how the plan strategy reflects consideration of employment land as set out in RDS.</p>	<p>7. BCC disagrees with this issue raised. A review of the existing employment land supply was carried out as part of the Urban Capacity Study, but will be supplemented by more detailed analysis in the form of a full Employment Land Review to inform land zonings and designations to be considered as part of the subsequent Local Policies Plan. Work is on-going on this detail employment land review to gain a clearer picture into the</p>

Main Issue	Council Response
<p>8. Evidence base is unclear with existing stock excluded.</p>	<p>condition and suitability of the existing stock.</p> <p>8. The report carried out by Ulster University's Economic Policy Centre (UUEPC) titled 'employment floor space requirements' sets out the forecasted demand over the plan period. It forecasts new floor space only and does not take account of the ability of existing stock to accommodate this new floor space. BCC can also advise that an up to date employment land review will be available shortly.</p>
<p>9. Over / under estimation of required floor space</p> <ul style="list-style-type: none"> <li>a) Larger amount of employment space needed.</li> <li>b) under estimation of required floor space.</li> <li>c) No buffer</li> </ul>	<p>9. BCC disagrees with this comments in respect to an oversupply / undersupply. To help establish economic growth projections and employment space requirements, the Council commissioned the UUEPC, regional academic authority on the subject, to forecast future economic scenarios and associated employment space requirements before publishing the POP. The same consultants advise not only BCC but also the NI Assembly on growth projections and employment needs for the wider region. The methodology followed therefore reflects wider growth implications across the region, whilst highlighting the specific requirements for the Belfast district.</p> <p>Forecasting future needs is inherently difficult and it will be affected by economic performance which can be impacted by the boom and bust cycle. This is a long term plan and the baseline data needs to be borne in the</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>context of the complex and changing dynamic of Belfast's evolving employment needs. Belfast is currently the second highest recipient of Foreign Direct Investment (FDI) in the UK and a growth centre for Fintec and Cyber Security, employment areas which did not exist only a few years ago. The advice from regional authorities on such matters is that the outlook for Belfast is very positive with a desire by these office based firms to locate in Belfast City Centre.</p>
<p>10. Concern approach taken in UCS leads to employment floor space capacity in city centre being overstated.</p>	<p>10. BCC disagrees with this issue. The Urban Capacity Study analysed several recently approved and pending office developments within the City Centre to establish an average gross density. This analysis estimated that the average gross density of office development in the City Centre is approximately 39,607m<sup>2</sup> per hectare.</p>
<p>11. The 550,000m<sup>2</sup> limits ability to respond to market changes.</p>	<p>11. BCC advises that it will be continually monitor and review its evidence base as the LDP moves forward. If circumstances change the approach will be to identify and release more land for employment purposes if required.</p>
<p>12. <b>Types of Employment space:</b></p> <ul style="list-style-type: none"> <li>a) No account taken of the different type of employment space that may be needed.</li> <li>b) Flat rates used inhibits disaggregation</li> <li>c) Cannot appraise extent to which supply could be developed to meet needs of different types of businesses</li> </ul>	<p>12. The figure of 550,000 sq. is the total amount of employment floor space required over the plan period. BCC considered it too prescriptive at the dPS stage to break down this total into the various B use classes. In many ways it would not be desirable to provide a further breakdown of these use classes. Setting aside the reliability of the data, what would be</p>

## Council response to key issues raised

Main Issue	Council Response
<p>13. Reliance on housing &amp; employment sites. Potential to increase capacity however should be treated with caution.</p> <p><b>Site Specific:</b></p> <p>14. Does not recognise TQ as important segment of CC commercial office market. Employment sites at TQ overlooked, despite identification in BCC Regeneration &amp; Investment Strategy as location suitable for office development. Change Requested: policy EC2 be amended to recognise Titanic Quarter (TQ) as part of the City Centre commercial office market.</p>	<p>gained from being more prescriptive. This could potentially could lead to overly restrictive policies.</p> <p>13. The Urban Capacity Study identified an indicative yield of 1,162,314 sq. metres if all employment sites were to come forward and be developed out. This amounts to over double the anticipated demand over the plan period without even factoring in sites which are suited to both housing and employment.</p> <p>14. BCC considers that there is adequate scope with the draft policy to allow for appropriate office development within Titanic Quarter. In line with regional policy such proposals may be acceptable where it is demonstrated that they cannot be accommodated within a city Centre location and would otherwise result in the loss of inward investment. The broader masterplan or development framework for site specific policies will be considered at the next stage of the plan.</p>
<p>Employment Land Evaluation Framework is required to determine quantum of employment space over plan period in line with the RDS.</p>	<p>A review of the existing employment land supply was carried out as part of the Urban Capacity Study, but will be supplemented by more detailed analysis in the form of a full Employment Land Review to inform land zonings and designations to be considered as part of the subsequent Local Policies Plan. Work is on-going on this detailed employment land review to gain a clearer picture into the condition and suitability of the existing stock.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Employment land allocation. Breakdown of 'rest of city' not clear clarification on allocations required.</p>	<p>BCC disagrees with this issue raised. The UUEPC report titled "Employment space requirements" set out the demand for B classes use as set out the Planning (Use classes) Order 2015 over the plan period. The report indicates that the greatest demand in employment growth will come from use class B1A General Offices which will be concentrated in the City Centre. The allocations recognise this but also the need to allow for employment growth within the harbour estate, the largest employment zoning within the district and the need to allow for employment growth in more peripheral areas to ensure inclusive economic growth. BCC considers "rest of Belfast city" to be lands within the plan area but out with the city centre and Belfast Harbour estates.</p>
<p><b>Site specific:</b> The continued retention of lands at Montgomery Road as a zoned employment site cannot be sustained.</p>	<p>BCC note the request for the removal of lands from an existing zoned employment site. The council will be considering the zoning of lands at the Local Policies Plan (LPP) stage of the development plan process.</p>
<p>Clarification as to whether the quantum within this policy relates to developable land or employment floorspace.</p>	<p>It was intended that that floorspace be the correct measure within the policy. See also minor modifications.</p>



## Policy EC3 – Major employment and strategic employment locations

### Summary of Responses

Eight respondents provided comments in relation to Policy EC3. Of the comments submitted:

- Two respondents submitted supporting comments: noting support for the retention of zoned employment areas/uses; and the approach and thrust of the policy;
- Four respondents made comments in relation to the evidence base. They have stated that it is either: not substantiated; not robust enough; they question the methodology; lack of transport plan/evidence; or suggest that an updated evidence base is required;
- Two respondents made comments in relation to the MEL/SEL terminology, their locations and how they were considered; and
- Clarification was sought from one respondent on how the LDP responds to the Belfast Agenda's aim of improved access to skilled employment for deprived communities.

### Responses received

Reference	Respondent
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-AV-2</a>	Heron Bros
<a href="#">DPS-B-A1-W</a>	Lidl Northern Ireland GmbH
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-A-6X-S</a>	Translink

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Two respondents submitted supporting comments: noting support for the retention of zoned employment areas/uses; and the approach and thrust of the policy.	Support for the proposed policy approach is welcomed.
<p><b>Evidence base:</b></p> <p>A total of four respondents made comments in relation to the evidence base for this policy.</p> <p>The key concerns relating to soundness include the following issues:</p> <ol style="list-style-type: none"> <li>1. Concern regarding approach taken in Urban Capacity Study.</li> </ol>	<ol style="list-style-type: none"> <li>1. BCC disagrees with this issue. BCC is satisfied that the approach taken in the Urban Capacity Study follows an</li> </ol>

## Council response to key issues raised

Main Issue	Council Response
<p>2. Misplaced assumption that committed sites will be developed over plan period.</p> <p>3. Inaccuracies in the recording of committed site employment yields.</p> <p>4. Concern approach taken in UCS leads to employment floor space capacity in city centre being overstated.</p>	<p>accepted methodology. In order to meet the requirements of the Strategic Planning Policy Statement (SPPS) based around the 5 broad stages set out in the planning practice guidance for England and Wales, which provides useful information on the process for undertaking Housing and Employment Land Availability Assessments (HELAA). These five stages are:</p> <ul style="list-style-type: none"> <li>• Stage 1: Sites identification</li> <li>• Stage 2: Sites assessment</li> <li>• Stage 3: Windfall assessment</li> <li>• Stage 4: Assessment review (including indicative trajectory)</li> <li>• Stage 5: Final evidence base</li> </ul> <p>2. Whilst it is accepted that committed sites may or may not be developed over the plan period, these sites do, however, give an indication of the amount of employment space available. They also represent a lawfully assessed and statutory commitment to the development of any given site.</p> <p>3. The floor space figures quoted in the office sector report are at a point in time. BCC is satisfied that the methodology and findings of the committed site employment yields are robust.</p> <p>4. BCC disagrees with this issue. The Urban Capacity Study analysed several recently approved and pending office developments within the City Centre to establish an average gross density. This analysis estimated that the average gross density of office</p>

Main Issue	Council Response
<p>5. Limiting provision would not support more than 25,000 additional jobs over plan period</p>	<p>development in the City Centre is approximately 39,607m<sup>2</sup> per hectare.</p> <p>5. The council does not agree with the assertion that "Limiting provision to level proposed would not support more than 25,000 additional jobs over plan period". The growth aspirations represents the Council's commitment to population and jobs growth set out in the Belfast Agenda, which is ambitious and capitalises on the role of Belfast as the driver of the regional economy. The level at which this is set is based on robust evidence provided in the Housing Growth Options report</p>
<p>6. Unclear how the plan strategy reflects consideration of employment land as set out in RDS.</p>	<p>6. BCC disagrees with this issue raised. A review of the existing employment land supply was carried out as part of the Urban Capacity Study, but will be supplemented by more detailed analysis in the form of a full Employment Land Review to inform land zonings and designations to be considered as part of the subsequent Local Policies Plan. Work is on-going on this detail employment land review to gain a clearer picture into the condition and suitability of the existing stock.</p>
<p>7. Evidence base is unclear with existing stock excluded.</p>	<p>7. The report carried out by UUEPC titled 'employment floor space requirements' sets out the forecasted demand over the plan period. It forecasts new floor space only and does not take account of the ability of existing stock to accommodate this new floor space.</p>

## Council response to key issues raised

Main Issue	Council Response
8. Evidence deficient in its consideration of implications of a continuation of current take up levels.	8. BCC considers the evidence to be robust. The take up levels used by CBRE relate to all office uptake including re-fits and refurbs. For the purposes of our office study the figure only relates to new office floor space.
9. Evidence deficient in consideration of drivers of floor space vacancy.	9. BCC did not consider it necessary to consider the drivers of floor space vacancy in the city centre. Whilst it is acknowledged that some of the vacant stock comprises of grade B and C quality BCC considered the total quantum of vacant floor space in combination with the existing pipeline supply within the city centre to be of greater importance with justifying the proposed policy approach.
10. Varying needs of different business sectors are not adequately captured in the evidence base.	10. The draft policy relates to B1(a) general offices and A2 financial, professional and other services. The example quoted in the representation is 'Catalyst Inc' in Titanic Quarter which is considered B1(c) Research and Development business use. This is considered an acceptable use in the wider harbour area including TQ.
11. Over estimation of required floorspace a. under estimation of required floorspace. b. Larger amount of employment space needed.	11. BCC disagrees with this comments in respect to an oversupply / undersupply. To help establish economic growth projections and employment space requirements, the Council commissioned the UUEPC, the regional academic authority on the subject, to forecast future economic scenarios and associated employment space requirements before publishing the POP. The same consultants advise not only BCC but also the NI Assembly on growth projections and

Main Issue	Council Response
<p><b>12. Types of Employment space:</b></p> <ul style="list-style-type: none"> <li>a. No account taken of the different type of employment space that may be needed.</li> <li>b. Flat rates used inhibits disaggregation</li> <li>c. Cannot appraise extent to which supply could be developed to meet needs of different types of businesses</li> </ul> <p><b>13. Site Specific:</b></p> <ul style="list-style-type: none"> <li>a. Does not recognise TQ as important segment of CC commercial office market. Employment sites at TQ overlooked, despite identification in BCC Regeneration &amp; Investment Strategy as location suitable for office development. Change Requested: policy EC2 be amended to recognise Titanic Quarter (TQ) as part of the City Centre commercial office market.</li> </ul>	<p>employment needs for the wider region. The methodology followed therefore reflects wider growth implications across the region, whilst highlighting the specific requirements for the Belfast district.</p> <p>12. The figure of 550,000 sq. is the total amount of employment floor space required over the plan period. BCC considered it too prescriptive at the dPS stage to break down this total into the various B use classes. In many ways it would not be desirable to provide a further breakdown of these use classes. Setting aside the reliability of the data, what would be gained from being more prescriptive. This could potentially could lead to overly restrictive policies.</p> <p>13. BCC considers that there is adequate scope with the draft policy to allow for office development within Titanic Quarter. Such development may be appropriate where it is demonstrated that it cannot be accommodated within a city centre location and would otherwise result in the loss of inward investment.</p>
<p>Employment land allocation. Breakdown of 'rest of city' not clear clarification on allocations required.</p>	<p>BCC disagrees with this issue raised. The UUEPC report titled "Employment space requirements" set out the demand for B classes use as set out the Planning (Use classes) Order 2015 over the plan period. The report indicates that the greatest demand in employment growth will come from use class B1A General Offices which will be concentrated in the City Centre.</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>The allocations recognise this but also the need to allow for employment growth within the harbour estate, the largest employment zoning within the district and the need to allow for employment growth in more peripheral areas to ensure inclusive economic growth. BCC considers "rest of Belfast city" to be lands within the plan area but out with the city centre and Belfast Harbour estates.</p>
<p>It is unclear how the LDP responds to the Belfast Agenda's aim of improved access to skilled employment for deprived communities?</p>	<p>Whilst this is an issue which lies outside the remit of the LDP, the LDP supports the Belfast Agenda (BA) and guides future investment and development decisions to enable spatial growth of the city up to 2035. In particular and in relation to this issue the "creating a vibrant economy" policies will help facilitate this aim/outcome.</p> <p>BCC considers that recognition has been given to the BA aim to improve access to skilled employment for deprived communities through the community cohesion and good relations policies, the promoting healthy communities policies as well as through the creating a vibrant economy policies.</p>
<p>Two respondents made comments in relation to the Strategic Employment Locations (SEL) / Major Employment Locations (MEL) terminology, their locations and how they were considered.</p>	<p>BCC acknowledges that the use of the SEL &amp; MEL terminology stems from RDS 2025. It is contended however that the thrust of the policy remains in compliance with strategic guidance within the RDS 2035: RG1- Ensure adequate supply of land to facilitate sustainable economic growth. Whilst the RDS 2035 does not repeat the strategic requirement to create and maintain a regional portfolio of SEL's, the council considers these to be important designations to facilitate economic growth and as such the terminology has been retained within the LDP.</p>

## Policy EC4 – Loss of zoned employment land

### Summary of Responses

Seven respondents provided comments in relation to Policy EC4. Of the comments submitted:

- Two respondents submitted supporting comments, noting the conformity with the RDS and protection of exiting employment uses;
- Three respondents made comments specifically in relation to alternative uses on zoned employment lands ultimately considering it to be inconsistent with SPPS;
- One respondent considers that the policy is likely to encourage windfall housing on zoned employment lands;
- Two respondents made comments in relation to the “period of time” mentioned in the policy in relation to supporting alternative uses;
- One respondent made comments in relation to the flexibility of the policy.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-6E-6</a>	Invest NI
<a href="#">DPS-B-A1-W</a>	Lidl Northern Ireland GmbH
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-8E-8</a>	Pragma Planning and Development Consultants Ltd
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-83-P</a>	The Royal Mail Group (RMG)

### Main Issue(s) raised by respondent(s) and Belfast City Council’s response

Main Issue	Council Response
Supporting comments, noting the conformity with the RDS and protection of existing employment uses.	Support for the proposed policy approach is welcomed.
Considering alternative uses in exceptional circumstances too restrictive. Inconsistent with SPPS. Remove: reference to: <ul style="list-style-type: none"> <li>• exceptional circumstances;&amp;</li> <li>• that proposals must be small scale &amp; ancillary</li> </ul>	The SPPS states that <i>“It is important that economic development land and buildings which are well located and suited to such purposes are retained so as to ensure a sufficient ongoing supply. Accordingly, planning permission should <u>not normally</u>* be granted for proposals that would result in the loss of land zoned for economic development use”</i> .

## Council response to key issues raised

Main Issue	Council Response
<p>It is unclear how this policy aligns with the SPPS in the context of the wider strategic growth.</p>	<p>The draft policy approach does not put a moratorium on the dPS considering alternative uses. It states that <b><i>permission should not normally be granted where it would result in the loss of zoned lands</i></b>, this is consistent with the requirements of the SPPS. Evidence gathered suggests that there is capacity in Belfast to allow for alternative uses.</p> <p>BCC therefore considers that the draft policy is in conformity with the requirements of the SPPS, in that it seeks to retain zoned employment lands.</p> <p><i>*emphasis added</i></p>
<p>Likely to encourage windfall housing on zoned employment land.</p> <p>Does policy apply to particular parts of the city? How do MELs &amp; SELs apply within in policy context?</p>	<p>BCC disagrees this this issue. Draft policy EC4 states that 'only in exceptional circumstances will the loss of employment land be considered. BCC considers the exception tests to be adequately robust to ensure that the land is primarily retained for employment use.</p> <p>Policy EC4 relates specifically to zoned employment land. At this stage in the process BCC is utilizing the existing draft BMAP employment zonings. It will consider the zoning of land at the Local Policies Plan stage. With regard to MELs and SELs these are the sites of existing employment land zonings identified within BMAP. They have been re-classified as Major and Strategic Employment locations within the new plan. There is no reference to the exclusion of MELs and SELs as they are areas of zoned employment lands and this policy specifically relates to these areas.</p>
<p>The period of 18 months indicated in bullet point b(3) of the policy is relatively short and could easily be circumvented to seek alternative uses. A period of 24</p>	<p>Any proposal for the loss of zoned employment lands will need to be considered against broader material considerations around supply and need.</p>



## Council response to key issues raised

Main Issue	Council Response
months would be more robust in respect of marketing zoned employment land.	The time period of 18 months was considered an adequate length of time to actively market a site taking into account similar policies in GB.
No flexibility to allow redevelopment for residential or mixed-use. Silent on redevelopment for other uses on sites not zoned.	The main objective of the policy is to protect existing employment zonings and to direct proposed employment uses to these zoned areas. The Urban Capacity Study has identified a significant oversupply of employment land. Given this it was considered not to afford the same protection to unzoned employment land. Proposals for the redevelopment of unzoned employment land will therefore be considered on a case by case basis having regard to other policies within the DPS.

## Council response to key issues raised

### Policy EC5 – Industry and storage and distribution uses

#### Summary of Responses

Two respondents provided comments in relation to Policy EC5. Of the comments submitted:

- One respondent seeks the Council to have due regard to their assets when allocating sites.
- The other respondent suggested that the policy should explicitly reference accessibility in relation to transport travel time.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-83-P</a>	The Royal Mail Group (RMG)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
General comments seeking the Council to have regard to respondent's assets when considering allocation of sites.	Site specific comments have not been requested at this stage of the plan process and will be dealt with under the Local policies Plan.
Paragraph 8.1.33 should also explicitly reference (transport travel time) accessibility.	Development proposals that come forward must comply with the whole of the plan and will be subject to meeting all other policy requirements. It is considered that accessibility is adequately covered under the draft transport polices.
Is there a definition of "normal planning conditions?"	BCC disagrees with the issue raised. Similar wording is used in the SPPS.

## Policy EC6 – Office development

### Summary of Responses

Twelve respondents provided comments in relation to Policy EC6. Of the comments submitted:

- One respondent submitted supporting comments, noting that the policy is in general conformity with the RDS;
- A number of respondents made comments in relation to the evidence base; the detailed comments are outlined in the table below;
- One respondent commented the need to ensure an adequate choice of sites and locations to meet the broad spectrum of need;
- One respondent seeks clarification on how the LDP responds to the Belfast Agenda's aim of improved access to skilled employment for deprived communities;
- One respondent commented on the need to strengthen policy in relation to supporting mixed office /residential development in city centre;
- One respondent stated that draft policy EC6 does not reference the restrictions implied by RET5.
- One respondent commented that the policy severely curtails potential B1 (a) office use on city corridors and arterial routes;
- Another respondent commented that the policy is too relaxed in its assumption that any new office development in the city centre should be granted. There should be a presumption that the use will be met where possible through the use of existing buildings;
- Two respondents made comments in relation to the floor space cap element of the policy requesting that it includes flexibility for a quantum above 400sqm but below 1000sqm i.e. subject to sequential test;
- One respondent stated that criterion a) is inappropriate in light of criterion c) in respect to Queens Office area; and
- Another respondent commented that the policy wording should also include 'planning permission will be subject to meeting all other policy requirements' to make it more effective and consistent with Paragraph 3.9 of the SPPS.

### Responses received

Reference	Respondent
<a href="#">DPS-B-UF-6</a>	Ashton Community Trust
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-AF-J</a>	Agent
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-A-QX-M</a>	Hughes McMichael
<a href="#">DPS-B-8X-U</a>	Agent
<a href="#">DPS-A-6E-6</a>	Invest Northern Ireland
<a href="#">DPS-A-Q2-E</a>	LATT Ltd

## Council response to key issues raised

Reference	Respondent
DPS-B-8G-A	Queen's University Belfast

Reference	Respondent
DPS-B-8Z-W	RSPB NI

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Supporting comments, noting that the policy in general conformity with the RDS.	Support for the proposed policy approach is welcomed.
There is scope to allow larger office development to be integrated into neighbourhoods and residential areas where specific nodes and opportunities arise.	The Office policy allows for office development up to 400 sq metres in district centres and 200 sq. metres along city corridors. Office development in excess of these thresholds will have to comply with the sequential test set out in the SPPS and policy RET 2. These areas along with the City Centre have been specifically identified due to their highly accessible locations and proximity to local communities.
<p><b>Evidence base:</b></p> <p>1. Evidence not substantiated &amp; risks constraining investment &amp; provision of targeted employment f/space</p>	<p>1. BCC disagrees with this comment. The evidence in relation to employment floor space is robust. The Council commissioned UUEPC to forecast future economic scenarios and associated employment space requirements predicated on providing an additional 46,000 jobs over the plan period. Alongside this, a high level review of the existing employment land supply was carried out as part of the Urban Capacity Study. The evidence indicates a large amount of approved office floor space within the city centre. It would therefore be counterintuitive to allow for office development in areas that have the potential to compete with the city centre. Such a stance would be contrary to the SPPS.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>2. Evidence is deficient in its consideration of a number of trends on take up of office space over the past year.</p>	<p>2. This is a long term plan where trends have been considered but also changing trends and how we respond to those are at the fore. The take up levels quoted in the market trends section of the office sector study have been obtained from Commercial property letting agents. These figures can be misleading as they quote all office take up including refurbishments / refits which in many cases includes no additional floor space. For the purposes of the demand and supply calculations this relates to new builds or extension where there has been an increase in floor area.</p>
<p>3. Does not recognise TQ as important segment of the city centre commercial office market &amp; location of choice for offices.</p>	<p>3. BCC considers that there is adequate scope within the draft policy to allow for office development within Titanic Quarter. Such development may be acceptable where it is demonstrated that they cannot be accommodated within a city Centre location and would otherwise result in the loss of inward investment.</p>
<p>4. The approach and assumptions applied could underplay need for employment space over plan period.</p>	<p>4. BCC disagrees with this issue. BCC is satisfied that the approach taken in the Urban Capacity Study follows an accepted methodology. There is significant capacity being proposed in part reflecting existing planning approvals. Employment land will be monitored annually and the plan is subject to 5 yearly review.</p>
<p>5. Policies take no account of the different type of employment space that may be needed (B uses).</p>	<p>5. BCC disagrees with this issue. The UUEPC "Employment space requirements" report provides a breakdown of the demand for different employment uses (B Classes) between 2016 and 2030. This was extrapolated out to gain figures for the plan period 2020-2035. This figures was</p>

## Council response to key issues raised

Main Issue	Council Response
<p>6. Evidence base- no distinction in vacancy rates. Varying needs of business sectors not adequately captured.</p>	<p>then adjusted to account for anticipated build out rates between 2016 and 2020.</p> <p>6. The Office Sector Study takes into account B1(a) and A2 as set out in the Planning (Use Classes) Order (NI) 2015. BCC did not consider it necessary to assess the varying needs of each business sector with these two use classes for the purposes formulating the office policy.</p>
<p>7. The Council's Office Study has attempted to isolate the specific need for offices, through the presentation of calculation which suggests that circa 213,000sqm of office space is needed across Belfast over the plan period.</p>	<p>7. BCC sought to isolate the specific need for offices over the plan period using the forecasted demand figures set out the UUPEC employment space requirements report and factoring in build out rates to obtain a final figure.</p>
<p>8. To support targeted scale of job creation larger amount of employment space needed. Limiting provision to level proposed would not support more than 25,000 additional jobs over plan period.</p>	<p>8. The council does not agree with the assertion that "Limiting provision to level proposed would not support more than 25,000 additional jobs over plan period". The growth aspirations represents the Council's commitment to population and jobs growth set out in the Belfast Agenda, which is ambitious and capitalises on the role of Belfast as the driver of the regional economy. The nature of employment has changed significantly in recent years and will continue to do so going forward. BCC considers that the level upon which this policy is set, is based on robust evidence provided in the Housing Growth Options report.</p>
<p>9. Build-out rates takes no account of specific requirements for different types of employment space.</p>	<p>9. The build out rates take account of all employment floor space (all B uses as set out in the Planning (Use Classes) Order 2015. BCC did not consider it necessary to take account of specific requirements for</p>

Main Issue	Council Response
<p>10. Absence of a detailed breakdown of sites: not possible to verify the accuracy of these estimates.</p>	<p>different types of employment space when gathering its evidence.</p> <p>10. BCC considers the breakdown of the pipeline supply to be accurate. The floor space figures quoted in the office sector report are at a point in time. BCC is satisfied that the methodology and findings of the committed site yields are robust. If some minor adjustments are necessary these can be made without affecting the soundness of the Plan.</p>
<p>11. The approach taken by the Council solely aims to accommodate forecast job growth, without any buffer. No flexibility re: employment space requirements. 550,000m<sup>2</sup> limit ability to respond to market changes.</p>	<p>11. BCC advises that it will be continually monitor and review its evidence base as the LDP moves forward. If circumstances change the approach will be to identify and release more land for employment purposes if required.</p>
<p>12. Evidence is deficient in its consideration of a number of trends in relation to office uptake.</p>	<p>12. BCC considers the evidence to be robust. The take up levels used by CBRE relate to all office uptake including re-fits and refurbs. For the purposes of our office study the figure only relates to new office floor space.</p>
<p>13. Evidence deficient in consideration of drivers of floor space vacancy.</p>	<p>13. BCC did not consider it necessary to consider the drivers of floor space vacancy in the city centre. Whilst it is acknowledged that some of the vacant stock comprises of grade B and C quality BCC considered the total quantum of vacant floor space in combination with the existing pipeline supply within the city centre to be of greater importance in justifying the proposed policy approach.</p>
<p><b>14. Types of Employment space:</b></p> <p>a. no account taken of the different type of employment space that may be needed</p>	<p>14. The figure of 550,000 sq. is the total amount of employment floor space required over the plan period. BCC considered it too prescriptive at the DPS</p>

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>b. flat rates used inhibits disaggregation</li> <li>c. Cannot appraise extent to which supply could be developed to meet needs of different types of businesses.</li> </ul>	<p>stage to break down this total into the various B use classes.</p>
<p>15. Minimum need figure of 550,000m<sup>2</sup> underestimates employment space needed to support future job growth.</p>	<p>15. BCC disagrees with this comment. To help establish economic growth projections and employment space requirements, the Council commissioned the UUEPC, the regional academic authority on the subject, to forecast future economic scenarios and associated employment space requirements before publishing the POP. The same consultants advise not only BCC but also the NI Assembly on growth projections and employment needs for the wider region. The methodology followed therefore reflects wider growth implications across the region, whilst highlighting the specific requirements for the Belfast district.</p>
<p>16. Policy premised on a 'substantial oversupply' of employment space.</p>	<p>16. The Urban Capacity Study identified a significant oversupply of employment space. BCC is satisfied that the methodology and findings of the UCS are robust.</p>
<p>17. New Employment sites at TQ overlooked, despite identification in BCC Regeneration &amp; Investment Strategy as location suitable for office development.</p>	<p>17. There is very limited reference to Titanic Quarter in the BCC Regeneration and Investment Strategy. The floor space figure arrived at in the Urban Capacity Study for Titanic Quarter is likely to have been taken from the agreed development framework. The development framework is likely to be reviewed at the LPP stage of the plan. There is significant capacity already existing through extant and un-implemented planning approvals to</p>



Main Issue	Council Response
<p>18. Concern approach taken in UCS leads to employment f/space capacity in city centre being overstated.</p>	<p>provide for the likely need of TQ until the LPP is progressed.</p> <p>18. BCC disagrees with this issue. The Urban Capacity Study analysed several recently approved and pending office developments within the City Centre to establish an average gross density. This analysis estimated that the average gross density of office development in the City Centre is approximately 39,607m<sup>2</sup> per hectare.</p>
<p>19. Reliance on housing &amp; employment sites. Potential to increase capacity however should be treated with caution.</p>	<p>19. The Urban Capacity Study identified an indicative yield of 1,162,314 sq. metres if all employment sites were to come forward and be developed out. This amounts to over double the anticipated demand over the plan period without even factoring in sites which are suited to both housing and employment.</p>
<p>20. Misplaced assumption that committed sites will be developed over plan period.</p>	<p>20. Whilst it is accepted that committed sites may not be developed out over the plan period, they do, however demonstrate the amount of employment space available. This can be used to measure existing capacity at a point in time. Importantly assessment of sites through DM process is much more rigorous than any plan can achieve. Planning approvals represent lawful commitments.</p>
<p>21. Inaccuracies in the recording of committed site employment yields.</p>	<p>21. The floor space figures quoted in the office sector report are at a point in time. BCC is satisfied that the methodology and findings of the committed site employment yields are robust. If some minor adjustments are necessary these can be made without affecting the soundness of the Plan.</p>

## Council response to key issues raised

Main Issue	Council Response
Need to ensure an adequate choice of sites and locations to meet the broad spectrum of need.	BCC acknowledges this point. However it considers that the draft policy approach best reinforces the direction of the SPPS and city centre centres first approach whilst allowing for choice at other locations within Belfast.
It is unclear how the LDP responds to the Belfast Agenda's aim to improve access to skilled employment for deprived communities	The LDP is the spatial articulation of the Belfast Agenda. The Council aims to have the right amount of employment land available in the right locations to ensure successful inclusive economic growth over the plan period. Whilst the LDP has an important role to play there are other channels and approaches beyond the remit of the plan that are better suited to improving skills development and the social economy. In its community planning role, the council will work with key partners to ensure that the LDP is effectively implemented and able to contribute to the overarching vision for the city. As set out in the Belfast Agenda, this will require new thinking in terms of collaborative planning, financing, data collection, performance management and project delivery. We will look for complementary opportunities to work with our partners in terms of resourcing and project delivery.
Strengthen policy in relation to supporting mixed office /residential development in city centre.	All proposals that come forward must comply with the whole of the plan and will be subject to meeting all other policy requirements. Policy EC6 sets out the policy requirements for office development within the city centre, with policy RD3 setting out the requirements for the conversion or sub-division of existing buildings for residential use. BCC considers that policies EC6 and RD3 provide the policy context for mixed office/residential development in city centre and as such are robust.

## Council response to key issues raised

Main Issue	Council Response
<p>As currently drafted EC6 does not reference the restrictions implied by RET5.</p> <p><b>Change</b> Further detail is required on how proposals will be assessed.</p>	<p>BCC acknowledges this point. However it should be noted that all proposals that come forward must comply with the whole of the plan and will be subject to meeting all other policy requirements.</p>
<p>Policy EC 6 severely curtails potential B1 (a) office use on city corridors and arterial routes.</p> <p><b>Change</b> Allow small office accommodation of up to 200 sq m by upper floor change of use or sensitive infill</p>	<p>BCC considers the policy wording to be clear in respect to B1 (a) general offices on city corridors stating that such proposals must comply with the sequential approach, as required by the SPPS, and meet all other policy requirements of the LDP.</p> <p>BCC considers the policy wording fully complies with the requirements of the SPPS.</p>
<p>Policy too relaxed in its assumption that new office development in the city centre should be granted. There should be a presumption that the use will be met where possible through the use of existing buildings.</p>	<p>BCC disagrees with this issue. It should be noted that any proposals that come forward must comply with the whole of the plan and will be subject to meeting all other policy requirements.</p>
<p>Two respondents made comments in relation to the floorspace cap element of the policy. They request that it include flexibility for a quantum above 400sqm but below 1000sqm i.e. subject to sequential test</p>	<p>The SPPS sets the overall policy context in relation to main town centre uses. B1(a) general offices falls under the definition of these uses. The draft policy approach is clear. Proposals for office development outside of the city centre and designation areas and those above the specified thresholds in designated areas will be subject to sequential test. BCC disagrees with this issue. Providing such a degree of flexibility would risk negatively impacting on the role of the city centre as the main location of office development. Recent studies, for example the centre for cities report "City centres: past, present and future", highlight the strong correlation between highly skilled city centre office jobs and the buoyancy of the evening and night-time economy.</p>
<p>Criterion a) is inappropriate in light of criterion c).</p>	<p>BCC disagrees with this issue. Criteria (a) is appropriate as it limits proposals for office</p>

## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
Class A2 should be encouraged in Queen's Office Area.	development to 200 sq. metres. Such a restriction is necessary as unrestricted office floor space inside Queens Campus area could impact adversely on the primacy of the city centre as first choice for office development.
The policy wording should also include 'planning permission will be subject to meeting all other policy requirements' to make it more effective and consistent with Paragraph 3.9 of the SPPS.	BCC disagrees with this issue. It should be noted that any proposals that come forward must comply with the whole of the plan and will be subject to meeting all other policy requirements.

## Policy EC7 – Higher education institutions

### Summary of Responses

Six respondents provided comments in relation to Policy EC7. Of the comments submitted:

- One respondent commented that the policy will encourage inward investment & requirements for office development at locations near institutions;
- One respondent suggested an amendment to reflect the importance of ancillary business uses and the need for better connectivity between HEIs and the city centre;
- One respondent commented that Queen's quarter development is constrained by height regulations, and conservation-related concerns;
- Another responded commented that the policy wording should be amended to make it more effective and consistent with the SPPS;
- One respondent seeks a broader policy heading to include Catalyst Inc: wider innovation and economic impacts outside educational provisions; and
- One respondent asked how will LDP respond to Belfast Agenda aim of improved access to skilled employment through skills development & support for social economy. And how will it identify and build on facilities for skills development within neighbourhoods that can support locally appropriate employment opportunities to complement policy EC7.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-1R-E</a>	Forward South Partnership
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-9D-8</a>	Shared City Partnership
<a href="#">DPS-B-A5-1</a>	The National Trust

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Policy will encourage inward investment & requirements for office development at locations near institutions.	Support for the policy approach is welcomed
Amend to reflect importance of ancillary/business uses & for better connectivity between Institutions & city centre.	BCC disagrees with this issue. The plan should be read as a whole. It contains policies specifically relating to employment uses and also policies which seek to improve connectivity throughout the plan area.

## Council response to key issues raised

Main Issue	Council Response
Queen's quarter development is constrained by height regulations, and conservation-related concerns	BCC recognises the important contribution Queens University makes to the wider economy. However it should be noted that Queens University campus sits within a number of conservation areas and contains a significant number of listed buildings which are protected by legislation. The draft policy approach follows a precautionary principle that primarily acknowledges the importance of these assets to Belfast.
The policy wording should be amended to make it more effective and consistent with the SPPS.	BCC disagrees with this issue. It should be noted that any proposals that come forward must comply with the whole of the plan and will be subject to meeting all other policy requirements.
Consider broader policy heading to include Catalyst Inc: wider innovation and economic impacts outside educational provisions.	BCC disagrees with this comment. Catalyst Inc falls under use class B1(c) research and development. This is adequately covered under policy EC 3: Major and Strategic Employment Locations.
<p>How will LDP respond to the Belfast Agenda aim of improved access to skilled employment through skills development &amp; support for social economy.</p> <p>Identifying and building on facilities for skills development within neighbourhoods that can support locally appropriate employment opportunities to complement policy EC7.</p>	The LDP is the spatial articulation of the Belfast Agenda. The Council aims to have the right amount of employment land available in the right locations to ensure successful inclusive economic growth over the plan period. Whilst the LDP has an important role to play there are other channels and approaches beyond the remit of the plan that are better suited to improving skills development and the social economy.

## Policy RET1 – Establishing a centre hierarchy

### Summary of Responses

Eight respondents provided comments in relation to Policy RET1. Of the comments submitted:

- Several respondents queried the robustness of the evidence base underpinning the policy, including:
  - The quality and depth of the health check for district centres was questionable;
  - Shopper Survey and geographical coverage flawed; and
  - No up-to-date survey of retail floor space;
- One respondent commented that the definition of edge of centre departs from previous definition in that it includes District and Local Centres;
- Another respondent stated that to ensure a coherent retail strategy city corridors need to be referenced as local centres within retail hierarchy;
- One response raised concern that some older stores are located in commercial areas but not in designated centres and policies may be too restrictive for upgrading older stores using sequential test;
- One response stated that there is no clear and effective 'problem solving' mechanism in place to deal with challenges such as regionally significant retail proposals outside the Council area.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-UW-Q</a>	Individual
<a href="#">DPS-A-64-N</a>	Henderson Group

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Housing Executive
<a href="#">DPS-B-8X-U</a>	Agent
<a href="#">DPS-B-A1-W</a>	Lidl
<a href="#">DPS-A-6U-P</a>	Organisation

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
General retail comments stating that the LDP continues to shape the city as if only retail matters.	The Council notes the comments made. The plan should be read as a whole. It recognises the changing dynamics of retailing and the need to supplement retailing provision with housing, leisure, hospitality and entertainment.
Definition of edge of centre departs from previous definition in that it includes District/Local Centres. This conflicts with SPPS, where edge of	BCC considers the draft policy offers strong protection of town centres in accordance with the SPPS. See also minor modifications.

## Council response to key issues raised

Main Issue	Council Response
centre locations considered to be 300m from Town Centre Boundary.	
How will the inner core of city be promoted ahead of neighbourhood & district centres and that an alternative strategy for the city centre should be developed.	Policy RET 1 is fully compliant with the SPPS. It sets out the retail hierarchy and positions Belfast city centre's primary retail core and frontage as the first choice for retailing proposals within Belfast. It will support and strengthen the distinctive role of Belfast city centre as the primary retail location in Northern Ireland. The plan aims to achieve balanced growth across the city, including the inner core. However from policy perspective the direction of city centre first and then subordinate centres is clear. The Council is satisfied that the wording is clear and it is based on robust evidence gathering.
To ensure a coherent retail strategy include reference to city corridors as local centres within retail hierarchy	Paragraph 6.280 of the SPPS states that a sequential test should be applied to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date LDP. City Corridors are not centres but routes recognised as performing a retailing role that complements local centres.
<p>A number of comments were received in relation to the robustness of the evidence base including:</p> <ul style="list-style-type: none"> <li>• Lack of revision to retail hierarchy &amp; lack of retail strategy/ambition.</li> <li>• Lack of empirical evidence in retail study. Quality &amp; depth of health check on DC's questioned.</li> </ul>	<ul style="list-style-type: none"> <li>• The Council is satisfied that Policy RET 1 is in line with the RDS and the SPPS. It puts forward and clear and coherent retail hierarchy for the assessment of proposals for main town centre uses including retail.</li> <li>• The Council is satisfied that the Retail &amp; Leisure Capacity Study follows an accepted methodology and empirical evidence is robust. The SPPS stipulates the requirement for a health check of the City Centre only (Paras 6.274 &amp; Para 6.285) and not District Centres. The broad-brushed health checks of the District Centres in the Retail Study need to be appreciated in this context. The</li> </ul>





## Council response to key issues raised

Main Issue	Council Response
	<p>extension to existing stores in excess of 1,000 gross m<sup>2</sup> might be acceptable in principle without the necessity to provide supporting information on retail need and impact. However, there is a risk of encroaching into permitted development rights. Putting aside the 50m<sup>2</sup> caveat, the 25% yardstick in The Planning (General Permitted Development) Order (Northern Ireland) 2015 for commercial extensions is too high. Also, as recognised in the aforementioned Order, the assessment of the extension would relate more to its actual floorspace increase as opposed to its percentage increase. Accordingly, it is considered that each case is assessed on its merits and a judgement made by Development Management. Reference to the thresholds stated in the LDP retail policy (500 gsm for convenience and 200 gsm for comparison floorspace) could aid decision-making in this regard.</p>
<p>Some stores are located in commercial areas but not in designated centres and policies may be too restrictive for upgrading older stores using sequential test.</p>	<p>See above response</p>
<p>There is no clear and effective 'problem solving' mechanism in place to deal with challenges such as regionally significant retail proposals outside the Council area.</p>	<p>BCC considers that the SPPS or other specific regional policy statements would be best placed to provide advice on this. It cannot by definition be left to a local development plan.</p>

## Policy RET2 – Out of centre development

### Summary of Responses

Eight respondents provided comments in relation to Policy RET2. Of the comments submitted:

- One respondent submitted supporting comments stating that it is pleasing to see a strong focus on the evidence base in the accompanying J&A text, so that applications will be fully considered in the current context;
- Several respondents queried the robustness of the evidence base underpinning the policy, including:
  - The quality and depth of the health check for district centres was questionable;
  - Shopper Survey and geographical coverage flawed; and
  - No up-to-date survey of retail floor space.
- One respondent stated that the policy wording is contrary to the last two lines of paragraph 6.279 of the SPPS;
- One respondent commented that policy RET2 ignores the role of city corridors which are acknowledged in Policy RET3 as the location of shops performing a local convenience and service role;
- One respondent stated that the Kennedy Centre should be designated a major district centre;
- One respondent commented that the existing SPPS already clarifies the sequential test and therefore there appears to be no coherent strategy or logical reason leading to the introduction and form of the proposed tests regarding suitability, availability and viability;
- One response raised concern that some stores are located in commercial areas but not in designated centres and policies may be too restrictive for upgrading older stores using sequential test;
- Another respondent commented that there is no clear and effective 'problem solving' mechanism in place to deal with challenges such as regionally significant proposals outside the council boundary.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8H-B</a>	Corbo ltd
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-64-N</a>	Organisation
<a href="#">DPS-B-8X-U</a>	Agent

Reference	Respondent
<a href="#">DPS-B-89-V</a>	Killultagh Estates
<a href="#">DPS-B-A1-W</a>	Lidl
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-A-6U-P</a>	Organisation

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
It is pleasing to see a strong focus on the evidence base in the accompanying J&A text, so that applications will be fully considered in the current context.	Support for the proposed policy approach is welcomed.
The policy wording is contrary to the last two lines of paragraph 6.279 of the SPPS.	BCC disagrees with the issue raised. The policy is not in conflict with the last two lines of the paragraph 6.279 of the SPPS.
It is unclear how proposals under the threshold of 1000sqm will be assessed. Consideration should be commensurate with the nature, scale and location of the proposal	Each case should be assessed on their own merits and a judgement made by Development Management. The LDP retail policy (500 gsm for convenience and 200 gsm for comparison floorspace) could guide.
Policy RET2 ignores the role of city corridors which are acknowledged in Policy RET3 as the location of shops performing a local convenience and service role.	Paragraph 6.280 of the SPPS states that a sequential test should be applied to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date LDP. City Corridors are not centres but routes recognised as performing a retailing role that complements local centres.
<p>A number of comments were received in relation to the robustness of the evidence base including:</p> <ul style="list-style-type: none"> <li>• Lack of revision to retail hierarchy &amp; lack of retail strategy/ambition.</li> <li>• Lack of empirical evidence in retail study. Quality &amp; depth of health check on DC's questioned.</li> </ul>	<ul style="list-style-type: none"> <li>• The Council is satisfied that Policy RET 2 is in line with the SPPS. It puts forward a clear and coherent retail hierarchy for the assessment of proposals for main town centre uses including retail.</li> <li>• The Council is satisfied that the Retail &amp; Leisure Capacity Study follows an accepted methodology and empirical evidence is robust. The SPPS stipulates the requirement for a health check of the City Centre only (Paras 6.274 &amp; Para 6.285) and not District Centres. The broad-brushed health checks of the District Centres in the Retail Study need to be appreciated in this context. The Study refers to indicators such</li> </ul>

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>The survey is inadequate (shopper survey design and geographical coverage flawed) and opposed to PAC Magherafelt supermarket inquiry.</li> </ul>	<p>as vacancy rates and footfall levels to give a broad idea of how a centre is performing. These are considered more reliable than turnover guesstimates inferred from surveys. The rationale for District Centre designations is outlined in Section 9.21 of the Belfast Retail and Leisure Study.</p> <ul style="list-style-type: none"> <li>BCC does not agree. The succinct telephone household survey was aimed at identifying shopping patterns and eliciting the opinions of shoppers in the Council area. It was not intended to form the basis of a market share analysis of expenditure flows across the Belfast Region from which to estimate the turnover of shops and centres. Aside from the cost implications of carrying out such analysis there are always question marks surrounding the ability of a lengthy telephone survey to yield reliable findings in this regard. Viewed in this context, the use of a projected average sales density from a recognised retail statistics body (Experian) was considered a more prudent means by which to estimate future floor space need as opposed to guesstimating turnover for specific centres. In terms of the geographical coverage it is important to note that the healthy LDP population forecast reflects the regional appeal of Belfast and this is acknowledged in Section 6.11 of the Retail and Leisure Study - <i>"...recognition of the LDP population forecast is particularly warranted on the strength of Belfast's status as the regional capital. Its commercial primacy means that its catchment extends well beyond its Council boundaries."</i></li> </ul>

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>No up-to-date survey of retail floorspace of stores/centres has been undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>BCC considers that data included in the Retail and Leisure Study is sufficient floorspace data for retail and leisure use is provided in the Study for the Primary Retail Area of Belfast City Centre, as surveyed by Experian GOAD. Overall floor space figures for the District Centres are also provided. Ideally, resources permitting, it would be useful to provide a comprehensive database of retail floor space across the District. However, this level of detail is not critical for forecasting, especially given the assumption of trading equilibrium and the considerable scope for additional retail floor space linked to healthy LDP population projections for the Council. Furthermore, it should also be noted that other retail studies in the UK did not consider it necessary to provide a Council-wide inventory of retail floor space e.g. Leicester and Blaby Town Centre and Retail Study 2015</li> </ul>
<p>The Kennedy Centre should be designated a major district centre</p>	<p>BCC does not agree. It seems the Inaltus submission is premised on upgrading the role of the Kennedy Centre to a Major District Centre (a classification not stated in the SPPS or the NPPF, which the SPPS is largely based on). Its hierarchical upgrade would apparently be at the expense of relegating the Dairy farm and Hillview District Centres to local centres. It is fair to assert that both of these DCs are not realising their potential but there have been recent proposals for these lands which would suggest that their status should be retained. It must be remembered that they are both located in areas of deprivation where there has been a longstanding desire to provide facilities of this type for the local population.</p>
<p>Some stores are located in commercial areas but not in designated centres and policies may be too restrictive for upgrading older stores using sequential</p>	<p>In some respects there would be benefits to providing advice on what scale of an extension to existing stores in excess of 1,000 gross m<sup>2</sup> might be acceptable in principle without the</p>

## Council response to key issues raised

Main Issue	Council Response
test.	necessity to provide supporting information on retail need and impact. However, there is a risk of encroaching into permitted development rights. Putting aside the 50m <sup>2</sup> caveat, the 25% yardstick in The Planning (General Permitted Development) Order (Northern Ireland) 2015 for commercial extensions is too high. Also, as recognised in the aforementioned Order, the assessment of the extension would relate more to its actual floorspace increase as opposed to its percentage increase. Accordingly, it is considered that each case is assessed on its merits and a judgement made by Development Management. Reference to the thresholds stated in the LDP retail policy (500 gsm for convenience and 200 gsm for comparison floorspace) could aid decision-making in this regard.
The existing SPPS already clarifies the sequential test and therefore there appears to be no coherent strategy or logical reason leading to the introduction and form of the proposed tests regarding suitability, availability and viability.	BCC disagrees with this comment. Unfortunately paragraph 6.289 of the SPPS does not clarify what is meant by the criteria of suitability, availability and viability when assessing alternative sites under the sequential test. The Council is keen to expressly formulate a policy on the sequential approach that provides greater clarity on the information required to substantiate the key criteria of suitability, availability and viability.
There is no clear and effective 'problem solving' mechanism is in place to deal with challenges.	BCC does not agree with this issue. It is assumed that this submission is referring to the absence of guidance on how to address regionally significant proposals located outside the Council area. The SPPS is best placed to provide advice on this.

### Policy RET3 – District centres, local centres and city corridors

#### Summary of Responses

Nine respondents provided comments in relation to Policy RET3. Of the comments submitted:

- One respondent supports the approach that beyond the city centre a district centre first approach should apply;
- One respondent commented that the policy needs to consider other town centres which catchments overlap;
- One respondent stated that the requirements of criterion (e) are unclear;
- One respondent commented that district centres perform (sic) at a local level and this flexibility should be recognised for adaptable retail provision
- One respondent commented that there is no indication what supplementary planning guidance will consist (sic) of or how it will supplement policy
- One respondent stated that retail catchments overlap and there is a lack of guidance on how district centres outside the council boundary are considered.
- One respondent stated that there is no guidance regarding overlapping district centres within neighbouring council areas.
- One respondent commented that health checks were only done for district centres in boundary. However proposals in Belfast could still impact on centres around edge / boundary.
- One respondent commented that there is no way to monitor how the sequential test assists district centres or how they compete with other district centres.
- Clarification is required as to whether amplification text forms part of policy or supporting text
- Promote district centres as locations for non-retail uses and other functions that support linked trips for communities.
- Several respondents queried the robustness of the evidence base underpinning the policy, including:
  - The quality and depth of the health check for district centres;
  - Shopper Survey and geographical coverage flawed; and
  - No up-to-date survey of retail floor space;
- One responded commented that criteria (b) and (c) should be deleted;
- One respondent commented that the policy curtails the use of city corridors for the use of convenience retailing and prohibits all comparison retailing along city corridors;
- One respondent stated that greater clarification needed in regard to exceptional circumstances, quantitative need & how retail development in local centres are assessed;
- One respondent seeks further guidance on the status of district centres & scale of development that would be acceptable in them;
- One respondent stated that Kennedy Centre district centre should be designated as a major district centre;
- One respondent stated that the policy is too restrictive for upgrading older stores;



## Council response to key issues raised

- One responded stated that there is no clear and effective problem solving mechanism in place to deal with challenges.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-AF-J</a>	Galgorm Group
<a href="#">DPS-A-64-N</a>	Organisation
<a href="#">DPS-A-QX-M</a>	Hughes McMichael

Reference	Respondent
<a href="#">DPS-B-8X-U</a>	Agent
<a href="#">DPS-A-Q2-E</a>	LATT Ltd
<a href="#">DPS-B-A1-W</a>	Lidl
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-A-6U-P</a>	URPA

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Beyond the city centre a district centres first approach is acceptable.	Support for the proposed policy approach is welcomed.
Policy needs to consider other town centres overlapping catchments, which would be sequentially preferable locations.	In its consultation response to the Draft Plan Strategy DFI states that there is no requirement for a council to assess other sequentially preferable sites in other council areas.
Bullet point 'e' is unclear in terms of what is required to be submitted.	BCC does not agree with this issue. Bullet point (e) seeks to ensure that proposals for retail development in local centres are easily accessible and seeks to improve connectivity.
Change: criteria b) and criteria c) should be deleted.	BCC disagrees that criterion (b) and (c) should be deleted.
Floor space threshold of 750sqm should apply for proposals with evidenced based assessments.	Retail Policy in the SPPS states a floor space threshold above 1,000 gross m <sup>2</sup> require an assessment of impact and need. This figure corresponds with the statutory threshold for major retail development in the Planning (Development Management) Regulations (Northern Ireland) 2015. While para 6.283 of the SPPS allows Councils the discretion to apply a lower threshold it is considered that this should only apply to local centres and differentiated for convenience and comparison goods retailing respectively. The UK studies consulted for the preparation of the Belfast Retail and Leisure Study did not adopt a secondary threshold of the size suggested.

## Council response to key issues raised

Main Issue	Council Response
<p>Policy RET 3 curtails the use of city corridors for the use of convenience retailing and prohibits all comparison retailing along city corridors citing the Lisburn Road as an example.</p>	<p>City Corridors are not defined in the retail hierarchy set out in the SPPS. Their identification will be progressed as part of the LPP preparation. Areas such as the Lisburn Road with significant proportion of retail use will be considered as to whether they merit specific status within the retail hierarchy set out in RET 1.</p>
<p>Re-introduce 500m<sup>2</sup> net convenience floorspace limited to City Corridors.</p>	<p>BCC disagrees with this issue raised. The blanket application of these thresholds along the city corridors runs contrary to the desire to concentrate retailing in local centres in accordance with the hierarchy identified.</p>
<p>Obligation within SPPS to provide policy guidance as to how district centres will be retained or consolidated.</p> <p>Promote DC's as locations for non-retail uses &amp; other functions that support linked trips for communities.</p>	<p>BCC disagrees with this issue raised. Policy guidance for the retention and consolidation of district centres is not a requirement under the SPPS. This notwithstanding, it is considered that the owners and operators of the district centre are best placed to explain the future outlook for district centres and to advise on how they should be developed in the future. There is an opportunity to consider the outlook for district centres in greater detail at the Local Planning Policies Stage.</p>
<p>Clarification needed in regard to exceptional circumstances, quantitative need &amp; how retail development in local centres are assessed.</p>	<p>Exceptional circumstances could relate to the ability of the proposal to secure the long term future of an historic building (both listed or of local significance). Equally they could relate to its capacity to include the wider regeneration of a number of vacant properties in the local centre via their incorporation into the development proposal.</p>
<p>Further guidance on status of district centres &amp; scale of development that would be acceptable in them</p>	<p>In terms of status district centres are the next level of retail centre after the city centre. The onus is on the applicant to decide what scale of development is suitable for the district centre in question. The boundaries of the district centre designations will in themselves help manage the potential of these centres. These boundaries however will be considered at the Local Policies Plan stage.</p>
<p>District centres perform (sic) at a local level, this flexibility should be</p>	<p>The LDP recognises that district centres perform "<i>an important retail role in providing consumers</i></p>

## Council response to key issues raised

Main Issue	Council Response
recognised for adaptable retail provision	<i>with convenience and choice in locations outside of the city centre.</i> "The Retail and Leisure Study also noted that their designation is "...to provide a critical mass of locally based retail and service uses beyond the city centre." It is not entirely clear what is meant by the term "adaptable retail provision". It would appear to be that cited in the context of also recognising the potential of district centres for restaurant use, leisure use, etc. Nonetheless, as stated previously, the owners of the centres are best placed to advise on the future role of their district centres and, if considered necessary, further consideration can be given to their roles at the Local Plan Policies stage.
Supplementary planning guidance: no indication what it will consistent (sic) of or how it will supplement policy	The Supplementary Planning Guidance will provide guidance on how proposals in district centres, based on their scale and nature, should be assessed in respect of the sequential test, and tests relating to impact and need.
Retail catchments overlap. No guidance on how District outside BCC boundary are considered.	In addition to the comments above it is worth noting that policy for neighbouring district centres is at the Preferred Options Stage only and detail is therefore lacking. Furthermore, consistency with policy approaches to these district centres in neighbouring Councils should ideally be guided by detailed advice at Departmental level, such as in the SPPS and Practice Notes, and regrettably this is not forthcoming.
No guidance regarding overlapping district centres within neighbouring council areas.	BCC is not responsible for preparing guidance for District Centres in other council areas. The district centres most likely to overlap with the trade of district centres in Belfast are Forestside and the Abbey Centre, the trade draw of which were both recorded in the household shopper survey results of the Belfast Retail and Leisure Study.
Health checks only done for district centres in boundary. Proposals in Belfast could still impact on centres around edge / boundary.	Past trends have indicated that proposals in neighbouring district centres such as Forestside and Abbey Centre are more likely to pose a threat to retail centres in Belfast, particularly Belfast city centre, than vice versa. Belfast city centre is particularly vulnerable in this regard because it

## Council response to key issues raised

Main Issue	Council Response
	cannot compete with free parking at district centres.
No way to monitor: District centres sequential test & impact on function or how they compete with other district centres.	In line with regional guidance, retail policy in the LDP is predicated on protecting and improving the city centre. It is not focused on attaining a detailed understanding of the existing and envisaged relationship between different centres, which is a study in itself. Having stated this, the appeal of the various district centres, including those in neighbouring Councils, was evidenced in the household survey results in the Retail and Leisure Study.
District centres perform (sic) at a local level, this flexibility should be recognised for adaptable retail provision	Further clarity in the submission on what is meant by an "adaptable location" and "adaptable retail provision" would have been helpful. This notwithstanding, it could equally be asserted that Belfast city centre is an "adaptable location" worthy of recognition for development opportunities.
Promote district centres as locations for non-retail uses and other functions that support linked trips for communities.	It is accepted that district centres offer both a retail and non-retail service to the local community. However, the reference in the SPPS for the need to retain and consolidate them is stated under its regional <u>retail</u> policy, which suggests that district centres are primarily fulfilling a retailing function.
<p>A number of comments were received in relation to the robustness of the evidence base including:</p> <ul style="list-style-type: none"> <li>• Lack of revision reference to retail hierarchy &amp; lack of retail strategy/ambition.</li> <li>• Lack of empirical evidence in retail study. Quality &amp; depth of health check on district centres questioned.</li> </ul>	<ul style="list-style-type: none"> <li>• The Council is satisfied that Policy RET 1 is in line with the RDS and the SPPS. It puts forward clear and coherent retail hierarchy for the assessment of proposals for main town centre uses including retail.</li> <li>• The assessment of retail need in Belfast up to 2035 outlines a range of healthy and low floorspace requirements based on LDP and NISRA population projections respectively. The healthy population forecast in the LDP is largely premised on higher density build and</li> </ul>

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>Inadequate shopper survey;</li> </ul>	<p>provides <u>significant</u> headroom for further retail development. In this regard the floor space capacity assessment can be acknowledged as making considerable allowance for Belfast's regional draw. This is acknowledged in Section 6.11 of the Retail and Leisure Study, as noted earlier in response to RET 1. Therefore, it was considered unnecessary to undertake a larger shopper survey of the Belfast region as an aid for investigating future floor space requirements. Earlier studies helped shed light on Belfast's regional appeal and there was no desire for duplication – especially given the survey costs that would be involved.</p> <ul style="list-style-type: none"> <li>The succinct telephone household survey was aimed at identifying shopping patterns and eliciting the opinions of shoppers in the Council area. It was not intended to form the basis of a market share analysis of expenditure flows across the Belfast region from which to estimate the turnover of shops and centres. Aside from the cost implications of carrying out such analysis there are always question marks surrounding the ability of a lengthy telephone survey to yield reliable findings in this regard. Viewed in this context, the use of a projected average sales density from a recognised retail statistics body (Experian) was considered a more prudent means by which to estimate future floor space need as opposed to guesstimating turnover for specific centres. In terms of the geographical coverage it is important to note that the healthy LDP population forecast reflects the regional appeal of Belfast and this is acknowledged in Section 6.11 of the Retail and Leisure Study - <i>"...recognition of the LDP population forecast is particularly warranted on the strength of Belfast's status as the regional capital. Its</i></li> </ul>

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>• No up-to-date survey of retail floor space of stores/centres.</li>   <li>• No provision of robust evidence base for 500 sqm gross external floorspace threshold.</li> </ul>	<p><i>commercial primacy means that its catchment extends well beyond its Council boundaries."</i></p> <ul style="list-style-type: none"> <li>• In some respects there would be benefits to providing advice on what scale of an extension to existing stores in excess of 1,000 gross m<sup>2</sup> might be acceptable in principle without the necessity to provide supporting information on retail need and impact. However, there is a risk of encroaching into permitted development rights. Putting aside the 50 m<sup>2</sup> caveat, the 25% yardstick in The Planning (General Permitted Development) Order (Northern Ireland) 2015 for commercial extensions is too high. Also, as recognised in the aforementioned Order, the assessment of the extension would relate more to its actual floorspace increase as opposed to its percentage increase. Accordingly, it is considered that each case is assessed on its merits and a judgement made by Development Management. Reference to the thresholds stated in the LDP retail policy (500 gsm for convenience and 200 gsm for comparison floorspace) could aid decision-making in this regard.</li> <li>• The 500 m<sup>2</sup> threshold has regard to the preceding BMAP Policy R4 and other recent retail studies in GB including Sheffield &amp; Rotherham Joint Retail &amp; Leisure Study 2017 and Leicester and Blaby Town Centre and Retail Study 2015. It is considered an approximate threshold for a local convenience store, beyond which stores are more readily associated with supermarkets that may be capable of facilitating trolley shopping.</li> </ul>
<p>Kennedy Centre district centre should be designated as a major district centre.</p>	<p>It seems the Inaltus submission is premised on upgrading the role of the Kennedy Centre to a Major District Centre (a classification not stated in the SPPS or the NPPF, which the SPPS is largely based on). Its hierarchical upgrade would</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>apparently be at the expense of relegating the Dairyfarm and Hillview District Centres to local centres. It is fair to assert that both of these DCs are not realising their potential but there have been recent proposals for these lands which would suggest that their status should be retained. It must be remembered that they are both located in areas of deprivation where there has been a longstanding desire to provide facilities of this type for the local population.</p>
<p>Some stores in commercial areas but not in designated centres and policies may be too restrictive for upgrading older stores using sequential test.</p>	<p>In some respects there would be benefits to providing advice on what scale of an extension to existing stores in excess of 1,000 gross m<sup>2</sup> might be acceptable in principle without the necessity to provide supporting information on retail need and impact. However, there is a risk of encroaching into permitted development rights. Putting aside the 50 m<sup>2</sup> caveat, the 25% yardstick in The Planning (General Permitted Development) Order (Northern Ireland) 2015 for commercial extensions is too high. Also, as recognised in the aforementioned Order, the assessment of the extension would relate more to its actual floorspace increase as opposed to its percentage increase. Accordingly, it is considered that each case is assessed on its merits and a judgement made by Development Management. Reference to the thresholds stated in the LDP retail policy (500 gsm for convenience and 200 gsm for comparison floorspace) could aid decision-making in this regard.</p>
<p>No clear and effective 'problem solving' mechanism is in place to deal with challenges.</p>	<p>It is assumed that this submission is referring to the absence of guidance on how to address regionally significant proposals located outside the Council area. The SPPS is best placed to provide advice on this.</p>

## Council response to key issues raised

### Policy RET4 – Retail warehousing

#### Summary of Responses

Five respondents provided comments in relation to Policy RET4. Of the comments submitted:

- One respondent was supportive, commenting that permitting limited convenience floor space of 300m<sup>2</sup> to meet a local need will reduce need to travel;
- One respondent commented that it is unclear how proposals for retail warehousing will be considered in line with the retail hierarchy outlined in Policy RET1 and the sequential test set out in the SPPS;
- Several respondents queried the robustness of the evidence base underpinning the policy, including:
  - The quality and depth of the health check for district centres;
  - Shopper Survey and geographical coverage flawed; and
  - No up-to-date survey of retail floor space.
- One respondent stated that there is no logic from which this policy has flowed and the floor space stipulations are unnecessary and an impediment to inward investment;
- Another respondent commented that there is no clear and effective ‘problem solving’ mechanism in place to deal with challenges.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8H-B</a>	Corbo ltd
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-A1-W</a>	Lidl
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-A-6U-P</a>	URPA

#### Main Issue(s) raised by respondent(s) and Belfast City Council’s response

Main Issue	Council Response
Permitting limited convenience floor space of 300m <sup>2</sup> to meet a local need will reduce need to travel.	Support for the proposed policy approach is welcomed.
There is no coherent strategy or logic from which this policy has flowed and the proposed floor space stipulations are unnecessary and an impediment to inward investment.	The reference to comparable studies is cited in the context of identifying thresholds in general, as trigger levels above which the issue of impact has to be considered. The adoption of the 300 net sqm threshold for convenience goods is based on similar thresholds identified for local shopping in studies such as Oxford city council Retail and Leisure Study 2017 and Leicester and Blaby town centre and Retail Study 2015. While it is not known if similar examples of this particular form of retail



Main Issue	Council Response
	<p>warehouse policy exist elsewhere it is considered that the incorporation of a floor space threshold on convenience goods is warranted for Belfast for a number of interrelated reasons. The city centre already faces significant competition from retail warehousing, notably at Boucher Road. This state of affairs is accentuated by the blurring of the lines between the definition of bulky comparison goods and non-bulky comparison goods. The increasing proportion of convenience items now being sold in warehouses has further undermined the original rationale for providing retail warehouses, namely to accommodate the floor space needs of bulky comparison items. Viewed in this context the threshold on convenience goods is introduced for clarity and to guide development management.</p> <p>Securing the occupation of vacant out of centre retail warehouse units is the responsibility the owner/operator and not the Council.</p>
<p>It is unclear how proposals for retail warehousing will be considered in line with the retail hierarchy outlined in Policy RET1 and the sequential test set out in the SPPS.</p>	<p>BCC disagrees with the issue raised. Retail warehousing areas are those outside the existing network of centres.</p>
<p>A number of comments were received in relation to the robustness of the evidence base including:</p> <ul style="list-style-type: none"> <li>• The survey is inadequate (shopper survey design and geographical coverage flawed) and opposed to PAC Magherafelt supermarket inquiry.</li> </ul>	<ul style="list-style-type: none"> <li>• The succinct telephone household survey was aimed at identifying shopping patterns and eliciting the opinions of shoppers in the council area. It was not intended to form the basis of a market share analysis of expenditure flows across the Belfast region from which to estimate the turnover of shops and centres. Aside from the cost implications of carrying out such analysis there are always question marks surrounding the ability of a lengthy telephone survey to yield reliable findings in this regard. Viewed in this context, the use of a projected average sales density from a</li> </ul>

## Council response to key issues raised

Main Issue	Council Response
<ul style="list-style-type: none"> <li>No up-to-date survey retail floor space. Policies too restrictive for upgrading older stores.</li> </ul>	<p>recognised retail statistics body (Experian) was considered a more prudent means by which to estimate future floor space need as opposed to guesstimating turnover for specific centres. In terms of the geographical coverage it is important to note that the healthy LDP population forecast reflects the regional appeal of Belfast and this is acknowledged in Section 6.11 of the Retail and Leisure Study - <i>"...recognition of the LDP population forecast is particularly warranted on the strength of Belfast's status as the regional capital. Its commercial primacy means that its catchment extends well beyond its Council boundaries."</i></p> <ul style="list-style-type: none"> <li>Floor space data for retail and leisure use is provided in the Study for the primary retail area of Belfast city centre, as surveyed by Experian GOAD. Overall floor space figures for the district Centres are also provided. Ideally, resources permitting, it would be useful to provide a comprehensive database of retail floor space across the district. However, this level of detail is not critical for forecasting, especially given the assumption of trading equilibrium and the considerable scope for additional retail floor space linked to healthy LDP population projections for the council. Furthermore, it should also be noted that other retail studies in the UK did not consider it necessary to provide a council-wide inventory of retail floor space e.g. Leicester and Blaby town centre and retail study 2015.</li> </ul>
<p>How will council cope with emerging retail problems if this plan does not present a useful roadmap?</p>	<p>It is assumed that this submission is referring to the absence of guidance on how to address regionally significant proposals located outside the council area. The SPPS is best placed to provide advice on this.</p>

## Policy RET5 – Primary retail area

### Summary of Responses

Three respondents provided comments in relation to Policy RET5. Of the comments submitted:

- One respondent's comments related to proposals for restaurants and café and how these would be assessed in the primary retail area;
- One respondent's comments related to factors causing vacancy within the primary retail core; and
- Another respondent stated that there is no clear and effective 'problem solving' mechanism in place to deal with challenges.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-A-6U-P</a>	Organisation

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
How proposals for restaurants and café uses will be assessed in the primary retail area.	BCC acknowledges that the policy is silent on how proposals for restaurants and café uses will be assessed in the primary retail area. The Council recognises the changing dynamics of the high street and the need to supplement retailing provision with leisure, hospitality and entertainment. Cafés and restaurants will be considered against other policies and the existing DCAN 4: Restaurants, cafes and fast food outlets.
Vacant units could be amalgamated; where they are concentrated; & what factors are contributing to vacancy	The purpose of Retail & Leisure Capacity Study prepared by Braniff Associates is to establish the baseline, undertake health checks and to project floor space need for the city up to 2035. It is not the intention that this document would consider how units could be used or to determine the contributing factors to their vacancy. BCC has commissioned other studies/reports such as the City Centre Regeneration and Investment Strategy which set out our collective ambition for the continued growth and regeneration of the city core and its surrounding areas to 2030. It should be pointed out however that paragraph 8.2.25 states that BCC notes the respondents' comments in relation to the regeneration and reuse of existing buildings.

## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
There is no clear and effective 'problem solving' mechanism in place to deal with challenges.	It is assumed that this submission is referring to the absence of guidance on how to address regionally significant proposals located outside the council area. The SPPS is best placed to provide advice on this.

## Policy RET6 – Temporary and meanwhile uses

### Summary of Responses

Two respondents provided comments in relation to Policy RET6. Of the comments submitted:

- There was support for the policy approach in respect of safeguarding the retail function and the flexibility to enable “pop up” shops in vacant units, events or annual festivals to assist with promoting an area and in sustaining a centre’s vibrancy;
- One respondent commented on criterion (f) stating that it would be important to re-assess the circumstances and impacts after one calendar year, rather than placing a blanket backstop on the use;
- One respondent commented that safeguards needed implemented to ensure overall retail function will not be undermined;
- Another respondent commented that there is no clear and effective mechanism in place to deal with challenges.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AB-E</a>	Retail NI

Reference	Respondent
<a href="#">DPS-A-6U-P</a>	Organisation

### Main Issue(s) raised by respondent(s) and Belfast City Council’s response

Main Issue	Council Response
The benefits of differentiation based on character and function are welcome.	Support for the proposed policy approach is welcomed.
The flexibility to enable “pop up” shops in vacant units, events or annual festivals will assist with promoting an area and in sustaining a centre’s vibrancy.	Support for the proposed policy approach is welcomed.
Safeguards needing implemented to ensure overall retail function will not be undermined.	The council acknowledges that safeguards need to be properly implemented to ensure overall retail function is not undermined. The policy criteria and the justification and amplification clearly set this out.
In respect to criterion (f) stating that it would be wise to re-assess the circumstances and impacts after one calendar year, rather than placing a blanket backstop on the use.	The council decided to place a one calendar year restriction to prevent temporary uses becoming permanent uses by proxy.

## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
There is no clear and effective 'problem solving' mechanism in place to deal with challenges.	It is assumed that this submission is referring to the absence of guidance on how to address regionally significant proposals located outside the council area. The SPPS is best placed to provide advice on this. It is assumed that this submission is referring to the absence of guidance on how to address regionally significant proposals located outside the council area. The SPPS is best placed to provide advice on this.

## Policy CC1 – Development opportunity sites

### Summary of Responses

Fourteen respondents provided comments in relation to policy CC1. Of the comments submitted:

- Supporting comments, for Policy CC1 to diversify the economy and promote residential developments.
- The policy did not address the retail sector challenges.
- Issues concerning connectivity between the city centre and neighbourhoods.
- Concerns about incompatible land uses impacting on existing business.
- Policy CC1 needed to address all policy requirements.
- Development opportunities should not be restricted to masterplan areas.
- Requested the inclusion of Titanic Quarter within the city centre boundary.
- Requested the inclusion of the Northern Fringe site Masterplan.
- Requested clarification on the Masterplan Preparation Process.

### Responses received

Reference	Respondent
<a href="#">DPS-A-HS-6</a>	Agent (Savills)
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Transport)
<a href="#">DPS-A-Q5-H</a>	Destination CQ Ltd

Reference	Respondent
<a href="#">DPS-A-6E-6</a>	Invest NI
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-83-P</a>	The Royal Mail Group (RMG)
<a href="#">DPS-A-6U-P</a>	Organisation
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Policy does not respond to the retail challenges or the threats between the regional centres.	The dPS should be read in its entirety, and contains the necessary policies to address the retail challenges due to changing consumer habits and online shopping. The aim of Policy CC1 is to facilitate the diversification of the city centre, to strengthen its role as a multifunctional regional centre. Sprucefield is the only regional shopping centre in Northern Ireland, but lies outside the

## Council response to key issues raised

Main Issue	Council Response
	BCC area and is in part dealt with in the SPPS in terms of the Retail hierarchy, in part in BMAP 2015, and again in the Lisburn Area Plan and the emerging Lisburn PS.
Connect city and neighbourhoods. Develop a plan to promote a culturally rich place for all citizens.	<p>The dPS should be read in its entirety, and contains the necessary Policy requirements to deliver positive place-making in promoting quality design, connecting neighbourhoods to a vibrant city centre, as well as preventing adverse impact to existing communities, infrastructure and facilities.</p> <p>The operational Transportation Policies promote sustainable transport to reduce the reliance on private car journeys, i.e. TRAN1, TRAN3, TRAN4 and TRAN8. This should help to provide high quality places, and reduce congestion and commuter parking in residential areas. The draft Plan Strategy is committed to achieving the objectives of the Belfast Agenda to encourage shared and balanced growth. The draft Plan Strategy supports the viability of District and Local Centres.</p>
This policy should make reference to transport impact assessments.	The dPS should be read in its entirety, and the necessary Policy requirements is contained in Policy TRAN 3 Transport Assessment
State permission will be subject to meeting all other policy requirements, to comply with SPPS.	The dPS should be read in its entirety, and contains the necessary Policy requirements to protect the environment. No change is required to Policy CC1 as criterion (c) already states that <i>Master plans, urban design and landscaped frameworks, and developers' briefs, shall be required to demonstrate a comprehensive approach to the planning and regeneration of the development opportunity area, and shall be consistent with the LDP objectives and policies.</i> The SPPS is also material to the assessment of planning applications as it contain many operational policies. The need to meet all other requirements is an established legal principle of planning.
A site specific issue was raised concerning the preparation of masterplan for the opportunity areas must be inclusive. Amend wording about market conditions. Development	The respondent comments are premature and are only relevant at the Local Policy Plan Stage. Policy CC1 provides direction and guidance for the future development opportunities in the city centre fringe areas that have remained undeveloped causing environmental blight. The Local Policies Plan will identify the potential sites; and determine the appropriate land uses, based on



## Council response to key issues raised

Main Issue	Council Response
opportunities not restricted to masterplan areas.	evidence of employment and housing needs, for the development opportunity sites to ensure the delivery of a balanced mix of uses within the city centre to secure the vision and aims of the LDP.
A site specific issue was raised concerning the compatibility of new land uses and potential environmental amenity impacts on existing business.	Master planning should help to determine the appropriateness of land uses within the vicinity of existing uses. The Local Policies Plan would provide details and KSR on potential land uses that would be appropriate to avoid incompatibility use issues.
A site specific issue was raised concerning the need to include TQ as a development opportunity area and include in City Centre.	This will be dealt with under the local Policies Plan.
A site specific issue was raised concerning the need to include the Gasworks Northern Fringe Masterplan for mixed use regeneration.	The Local Policies Plan would provide details and KSR on potential land uses.
<p>A site specific issue was raised requesting clarification about the preparation, process, and adoption of masterplans.</p> <p>Considered too inflexible. Adopted masterplans should not be prescriptive; used for guidance and are a material consideration.</p> <p>Clarity about masterplans preparation. Coherent, flexible approach required to secure development. Delete criteria b and d. Frameworks for smaller plots to ensure wider masterplan compliance.</p>	BCC disagrees with the issue raised. The Policy adequately covers what is required from development proposals. Greater detail will come forward under the Local Policies Plan stage.

## TLC1: Supporting tourism leisure and cultural development

### Summary of Responses

Eight respondents provided comments in relation to policy TLC1. Of the comments submitted:

- Supporting comments, noting the benefits of encouraging tourism, leisure and cultural development.
- Suggested changes to address sustainability and the protection of tourism assets and the natural environment.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners
<a href="#">DPS-A-67-R</a>	Cathedral Quarter Trust
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-8C-6</a>	Individual

Reference	Respondent
<a href="#">DPS-A-17-K</a>	Conrad Kirkwood
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-A5-1</a>	The National Trust NI

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
A number of respondents support the broad approach of the policy.	Support for the proposed policy approach is welcomed.
Sustainable tourism is not promoted, and omits the natural environment. There should be no hierarchy to meet other policies and SPPS. Need to safeguard tourism assets from inappropriate development.	The Policy should be read in conjunction with all the other policies contained in the draft Plan Strategy. In particular Policy TLC2 Protection of existing assets, (page 174), NH1 Protection of Natural Heritage resources (page 255), and Policies for the Built Heritage in section 7.4 (page 112), which provide the appropriate safeguards.

## TLC2: Existing tourism leisure and cultural facilities and assets

### Summary of Responses

Five respondents provided comments in relation to policy TLC2. Of the comments submitted:

- Supporting comments, noting the benefits of protecting existing tourism, leisure and cultural facilities and assets.
- The policy is not robust enough to safeguard the built and natural environment.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners
<a href="#">DPS-B-AB-E</a>	Retail NI

Reference	Respondent
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-A5-1</a>	The National Trust NI
<a href="#">DPS-A-QU-H</a>	Theatre Trust

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
A number of respondents support the broad approach of the policy.	Support for the proposed policy approach is welcomed.
The Policy is unsound because it does not robustly safeguard the built and natural environment, which are regarded as tourism assets.	The Policy should be read in conjunction with the other policies contained in the draft Plan Strategy. In particular NH1 Protection of Natural Heritage resources (page 255), and Policies for the Built Heritage in section 7.4 (page 112), which provide the appropriate safeguards.

## Council response to key issues raised

### TLC3: Overnight visitor accommodation

#### Summary of Responses

Nine respondents provided comments in relation to policy TLC3. Of the comments submitted:

- Supportive of the proposed policy approach.
- Concerned with the policy wording regarding the assessment of applications, and the possible suggestion of a hierarchical policy approach.
- Concerned that a City Centre first approach was being considered.
- There should be a requirement to demonstrate the need for overnight visitor accommodation.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure – Strategic Planning Directorate
<a href="#">DPS-B-AZ-6</a>	George Best City Airport

Reference	Respondent
<a href="#">DPS-A-QX-M</a>	Hughes McMichael
<a href="#">DPS-A-68-S</a>	Áine Groogan
<a href="#">DPS-A-Q2-E</a>	LATT Ltd
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-A5-1</a>	The National Trust NI

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
A number of respondents support the broad approach of the policy.	Support for the proposed policy approach is welcomed.
Lack of detail on how City Centre overnight accommodation proposals will be assessed.	The Plan should be read as a whole and all development proposals must be subject to meeting all other policy requirements.
The Policy has created a hierarchy to meet other policies and SPPS. There should be no hierarchy to meet other policies and Include sustainability, and environmental sensitivity.	The Plan should be read as a whole and all development proposals must be subject to meeting all other policy requirements.
Unduly restrictive and it should permit visitor accommodation at the airport, a gateway location.	Policy TLC3 would permit appropriate hotel development at Airport locations as it is considered an important part of the tourism infrastructure in Belfast.
Limiting accommodation to the City Centre, ignores the need for a balanced	The policy supports the Community Plan, Belfast Agenda; and the activities of the ICC and Visit

## Council response to key issues raised

Main Issue	Council Response
<p>approach and choice. Should include other users as well as tourist. It should apply to district centres and LVRP.</p>	<p>Belfast to attract external visitors on short stay city breaks. It will help the growth of a strong evening economy within the city centre; ensuring that overnight visitor accommodation is sited within easy walking distance. The Policy permits overnight visitor accommodation outside of the city centre, within tourism clusters, or adjacent to visitor attractions served by public transport. A sustainable approach has been adopted to enhance the attractiveness, and viability of the city centre, whilst ensuring that the supply of sites outside of the city centre for local services and housing are not compromised.</p> <p>The Policy is considered to provide sufficient scope to ensure an adequate supply and choice of overnight visitor accommodation for a variety of visitors and tourist within the Plan Area.</p>
<p>No inclusion to demonstrate need for additional overnight accommodation. Robust evidence base required to justify new accommodation. Planning permission is subject to demonstrating the need for new overnight accommodation.</p>	<p>The policy supports the strategic aims to grow the tourism industry and increase its contribution to the local economy. There has to be a sufficient supply of overnight visitor accommodation to support the growth of external visitors. The proposed additional criterion is not considered appropriate within this Policy. The Council does not wish to constrain potential supply of overnight visitor accommodation that could compromise its Tourism Strategy and the Community Plan "Belfast Agenda" to support the growth of the tourism sector.</p>

## TLC4: Evening and night-time economy

### Summary of Responses

Six respondents provided comments in relation to policy TLC4. Of the comments submitted:

- Supporting comments, noting the benefits of supporting the evening economy.
- Consideration must be given to the amenity of residents.
- Need to protect existing 24/7 business operations from new residential development nearby.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour Commissioners
<a href="#">DPS-A-6E-6</a>	Invest NI
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-AB-E</a>	Retail NI
<a href="#">DPS-B-83-P</a>	The Royal Mail Group (RMG)
<a href="#">DPS-A-QU-H</a>	Theatre Trust

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
A number of respondents support the broad approach of the policy.	Support for the proposed policy approach is welcomed.
Residential development can support an evening economy. Need to protect residential amenity.	The Policy adopts the Agent of Change principle, which seeks to ensure that new residential development near existing evening economy uses will have to be designed to incorporate mitigation measures to reduce the potential impact on residential amenity. Likewise new evening economy uses will have to be designed to incorporate mitigation measures to protect existing residential amenity.
This is a site specific issue concerning the need to protect existing business operations from new residential development nearby.	Policy ENV1 Environmental Quality should help to address RMG concerns concerning sensitive uses being co-located adjacent to a major business that operates on a 24/7 basis. This matter can be assessed as part of the preparation of the Local Policy Plan to mitigate potential impact on business operations.

## Infrastructure – General

### Summary of Responses

Four respondents provided comments in relation to the infrastructure section and Technical Supplement 15 (TS 15) which can be summarised as follows:

- One respondent stated that significant investment would be needed to increase the capacity at the Belfast Wastewater Treatment Works to accommodate the growth proposals.
- One respondent stated that any new infrastructure should be matched by enhanced environmental quality.
- One respondent expressed the importance that the interests of infrastructure providers are considered in Section 76 Planning Agreements.
- One respondent expressed uncertainty around how BCC plans to include sewerage related improvements within Section 76 Planning Agreements.
- One respondent expressed concern at a lack of cohesion between the Plan and Technical Supplement 15 and that TS 15 contained out of date information.

### Responses received

Reference	Respondent
<a href="#">DPS-B-86-S</a>	Organisation
<a href="#">DPS-A-QV-J</a>	Northern Ireland Water
<a href="#">DPS-B-U5-N</a>	DFI Water and Drainage Policy Division (WDPD) - DFI

Reference	Respondent
<a href="#">DPS-B-8V-S</a>	Co-Ownership Housing

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Concern was expressed that significant investment would be needed to increase the capacity at the Belfast Wastewater Treatment Works. Although it was further stated that even if funding is available, given the scale of the investment required there may be a period where growth could not be accommodated.	Where infrastructure constraints are identified, there may be a need to phase the delivery of housing or employment space to align with infrastructure investment. This will be considered in more detail as part of the Local Policies Plan, informed by the pending Belfast Infrastructure Study.
There was a view that any new infrastructure should be matched by enhanced environmental quality to protect citizens from materially harmful development.	The Council agrees with this statement and it is in line with the policy approach in the dPS.

## Council response to key issues raised

Main Issue	Council Response
<p>One respondent expressed the importance that the interests of infrastructure providers are considered in Section 76 Planning Agreements.</p>	<p>The Council agree with this statement and has produced a (draft) DCF and planning agreements.</p>
<p>There was uncertainty around how BCC plans to include sewerage related improvements within Section 76 Planning Agreements.</p>	<p>The Council would refer to the guidance outlined in the draft DCF. The Council will consider the use of developer contributions to provide appropriate drainage infrastructure including Sustainable Drainage Systems where they are required. In relation to larger infrastructure schemes the council will be guided by the appropriate statutory provider and the framework states "When considering implementation, developers should have regard to future-proofing of infrastructure works and the need to liaise with other service providers including water, sewerage, waste, electricity and digital infrastructure." It should be noted that this approach is not new, the BMAP Plan Strategy &amp; Framework (Part 3, Volume 1) states: 'Many development sites will require the improvement of existing infrastructure and/or the provision of additional supplementary infrastructure to enable the development to take place. The infrastructural works may relate to transport, water and sewerage or land drainage. It is Government policy that developers will bear the full cost of works required to facilitate their development proposals. This policy applies to both public and private sector developments. Where appropriate, Planning Agreements under Article 40 of the Planning (Northern Ireland) Order 1991 may be used to enable development to proceed. Developers are urged to liaise early in the preparation of their proposals, with the relevant Department, Agency or service provider.'</p>



## Technical Supplement 15

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>One respondent expressed concern at a lack of cohesion between the Plan and Technical Supplement 15 in regard to available capacity in Belfast's waste water treatment network and the Living with Water Programme.</p>	<p>Technical Document 15 was used to inform the preparation of the dPS. The ambitious growth strategy, taking the potential beyond the already established baseline in the later part of the projected plan timescales, has been subject to ongoing engagement and discussion with statutory bodies over a number of years as well as articulated through the Belfast Agenda. This was also an important aspect of the Preferred Options Paper published for consultation alongside the Belfast Agenda. It is acknowledged that the DfI Response to the POP requested that the Council provided evidence to support the level of ambition and this was addressed through the additional commissioned research and urban capacity work brought forward with the draft Plan Strategy. The challenges with regard to the lack of investment in infrastructure were apparent from the work that lead to the Living with Water and other initiatives. The Council has, through these and other engagement processes, ensured that the statutory agencies are aware of the both the legacy of approved development and the nature of the potential growth across the lifetime of the development plan. It should also be recognised that BCC has put considerable effort into providing more detailed data in respect of the scale and location of proposed development to assist NI Water with the consideration of the infrastructure implications. This informal exchange of information has recently been progressed to a more formal basis through the work on setting up an MOU for the ongoing exchange of data.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>One respondent has stated that Technical Supplement 15 Public Utilities contains information on wastewater system capacity provided for BMAP in Appendix D which is out of date. It is stated that TS 15 should be amended to take account and refer to NI Water wastewater system capacity information provided to the Council most recently updated in September 2018.</p>	<p>Technical Supplement 15 contains the latest advice in the main body of the document provided to the Council from NI Water at the time of publication in August 2018. The information is outlined in Para 3.26 and was provided by NI Water in February 2017. There is a drafting error in Appendix D and it will be amended. <b>See also minor modifications table.</b></p>

## Policy ITU 1 – Telecommunications development

### Summary of Responses

Two respondents provided comments in relation to Policy ITU 1, which can be summarised as follows:

- One respondent supports the broad approach of the policy.
- One respondent felt that the policy fails tests CE2 and CE4 and suggested that the policy wording be amended.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour

Reference	Respondent
<a href="#">DPS-B-AZ-6</a>	George Best City Airport

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent supported the broad approach of the policy.	BCC welcome your support for this policy
A view was expressed that the policy fails tests CE2 and CE4 and has not considered any reasonable alternatives. The suggestion was made to amend the wording to include aviation safety.	Airport Safeguarding and Public Safety Zones already provide protection by preventing any development that would prejudice future airport operations. It is not considered necessary to make any amendment.

## Council response to key issues raised

### Policy ITU 2 – Water and sewerage infrastructure

#### Summary of Responses

Two respondents provided comments in relation to Policy ITU 2, which can be summarised as follows:

- One respondent supports the broad approach of the policy.
- One respondent felt that the policy puts the onus on statutory authority to support growth.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent supported the broad approach of the policy.	BCC welcome your support for this policy.
A view was expressed that the policy puts the onus on statutory authority to support the planned growth and that BCC will address constraints by supporting the statutory authority.	The Belfast Agenda was developed through a sustained engagement process as an inter-agency community plan led by the Council with the support of the central government departments and other stakeholders. The working groups tasked with the development and delivery of the community plan objectives included membership from the Department for Infrastructure, including Transport, Rivers and NI Water. The ambitious growth strategy, taking the potential beyond the already established baseline in the later part of the projected plan timescales, has been subject to ongoing engagement and discussion with statutory agencies as well as being articulated through the Belfast Agenda. This was also an important aspect of the Preferred Options Paper published for consultation alongside the Belfast Agenda. It is acknowledged that the DfI Response to the POP requested that the Council provided evidence to support the level of ambition and this was addressed through the additional commissioned research and urban capacity work brought forward with the draft Plan Strategy. The challenges with regard to the lack of investment in

## Council response to key issues raised

Main Issue	Council Response
	<p>infrastructure were apparent from the work that lead to the Living With Water and other initiatives. The Council has through these and other engagement processes ensured that the statutory agencies are aware of the both the legacy of approved development and the nature of the potential growth across the lifetime of the development plan. The Council has put considerable effort into providing more detailed data in respect of the scale and location of proposed development to assist NI Water with the consideration of the infrastructure implications. This informal exchange of information has recently been progressed to a more formal basis through the work on setting up an MOU for the ongoing exchange of data.</p>

## Council response to key issues raised

### Policy ITU 3 – Electricity and gas infrastructure

#### Summary of Responses

Three respondents provided comments in relation to Policy ITU 3, which can be summarised as follows:

- Three respondents supported the broad approach of the policy.
- One respondent suggested that a fossil fuel exit strategy would make the Plan sound.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-A-6R-K</a>	Organisation

Reference	Respondent
<a href="#">DPS-B-82-N</a>	SONI

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent supported the broad approach of the policy.	BCC welcome your support for this policy.
One respondent supported the Council's approach to essential electricity infrastructure that will support economic and social development.	BCC welcome your support for this policy.
A suggestion was made that a fossil fuel exit strategy was required to make the Plan sound.	Policy ITU 4 recognises the issue of dependence on imported fossil fuels and promotes the development of renewable energy generating facilities in appropriate locations. However, the development of a fossil fuel exit strategy is considered outside the remit of this plan.
One respondent stated that the electricity transmission grid's importance should not be understated in the dPS.	BCC welcome your support for this policy.

## Policy ITU 4 – Renewable energy development

### Summary of Responses

Six respondents provided comments in relation to Policy ITU 4, which can be summarised as follows:

- One respondent stated that the policy does not effectively protect sensitive landscapes from renewable energy development and suggested a presumption against development in these areas would be more effective.
- One respondent supports the policy but felt it could benefit from supplementary guidance.
- One respondent supports the policy but felt it does not recognise the potential for Smart Grid deployment.
- One respondent felt that for the policy to be effective certain elements of the SPPS need to be carried across. It was further suggested that there was disparity between the wording in the policy and the justification and amplification section which has the potential to cause conflict.
- One respondent supports the broad approach of the policy.
- One respondent felt that the policy does not clearly align with the balanced approach and intent of SPPS.

### Responses received

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust
<a href="#">DPS-A-HM-Z</a>	PowerOn technologies Ltd t/a The Electric Storage Company
<a href="#">DPS-B-AM-S</a>	Belfast Harbour

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-82-N</a>	Department for Infrastructure

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Concern was raised that the policy does not effectively protect sensitive landscapes from renewable energy projects. A suggestion was made that a presumption against renewable energy development in these areas would be more effective.	Policy ITU 4 includes protection under Bullet point g. It states that that development must demonstrate it "has taken into consideration the cumulative impact of existing wind turbines, those which have permissions and those that are currently the subject of valid but undetermined applications".

## Council response to key issues raised

Main Issue	Council Response
	Protection of sensitive landscapes is already provided in LC1 - Landscape. The LDP needs to be read as a whole plan. No policies can be considered in isolation.
One respondent supported the policy but felt it could benefit from supplementary guidance. Suggested that the LPP could indicate areas where renewable energy will be acceptable.	BCC welcome your support for this policy. Any designations will be considered at the Local Policies Plan Stage.
Concern was expressed that the Plan does not recognise the potential for Smart Grid deployment.	The Council recognises the benefits of smart grid technologies however, the deployment lies outside the remit of this plan.
Concern was raised that the cautious approach to renewable energy development in areas of significant value, advocated in the SPPS is absent from the Plan.	Protection of sensitive landscapes is already provided in LC1 - Landscape. The LDP needs to be read as a whole plan. No policies can be considered in isolation.
There was a suggestion that in order for the policy to be effective, the consideration of cumulative impact should be extended to include all types of renewable energy development.	Policy ITU 4 provides protection and states that any renewable energy development proposals, including ancillary development, in areas designated of importance for landscape quality, nature conservation or scientific interest will be required to demonstrate that the development will not have a significant detrimental impact on the local or wider environment.
A view was expressed that if the plan area contains any areas of active peatland then the policy will need to contain a presumption against energy development on such habitat unless there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland).	Protection of sensitive landscapes is provided in LC1 - Landscape. The LDP needs to be read as a whole plan. No policies can be considered in isolation.
One respondent felt that there is disparity between the wording in the policy and the justification and amplification section which has the potential to create conflict.	The policy text and Justification and amplification section are both closely aligned to the SPPS and to PPS 18 renewable energy. The justification and amplification text positively sets out the need for renewable energy and the planning considerations in a similar way to PPS18, adding value to the



## Council response to key issues raised

Main Issue	Council Response
	policy and bolsters the policy direction and intent. ITU4 will provide the flexibility to accommodate, where appropriate, new renewables over the next 15 years which are not currently under consideration.
It was suggested that in order to make the policy effective, the provisions of Paragraph 4.17 of PPS 18 relating to repowering/ re-equipping turbines should to be copied across.	It is not considered necessary to provide this detail. The criteria outlined in Policy ITU4 will be used to assess any repowering or re-equipping of turbines.
A suggestion was made to extend paragraph 9.124 of the Plan to include reference to the Conservation (Natural Habitats, etc) Regulations (NI) 1995 (as amended) where the 'competent authority' is required to undertake an Appropriate Assessment of any proposal that has the potential to significant affect a European Site.	This is covered in Policy NH1 Protection of natural heritage resources. The LDP needs to be read as a whole plan. No policies can be considered in isolation.
One respondent supported the broad approach of the policy.	BCC welcome your support for this policy.
One respondent stated that there is no reference to water quantity in policy criteria d.	Policy ITU 4 can be amended to include a reference to water quantity in line with SPPS. <b>See minor modifications table.</b>
A view was expressed that the wording of the justification and amplification section did not clearly align with the balanced approach and intent of the SPPS.	It is considered that this policy is in line with SPPS. The wording in this section states that "in assessing renewable energy development proposals, the council will give particular consideration to relevant environmental and planning issues in accordance with SPPS".

## Council response to key issues raised

### Policy W1 – Environmental impact of a waste management facility

#### Summary of Responses

Three respondents provided comments in relation to Policy W1, which can be summarised as follows:

- One respondent felt that the policy fails tests CE2 and CE4 and suggested the policy be amended to allow development in a port area.
- One respondent highlighted the omission of the point “relates to compatibility with the character of surrounding area and adjacent land uses” from the justification text.
- One respondent expressed uncertainty around what imperative reasons could trump something that causes significant environmental damage.
- One respondent requested to see a reduction in landfill and suggested that the Council should explore alternative means of dealing with and disposing of waste.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

Reference	Respondent
<a href="#">DPS-B-82-N</a>	Department for Infrastructure

#### Main Issue(s) raised by respondent(s) and Belfast City Council’s response

Main Issue	Council Response
One respondent felt that the policy fails tests CE2 and CE4. They suggested the policy be amended to allow development in a port area as reflected in Policy W2.	Any proposals will be assessed against Policy W1, W2 and the SPPS and on a case by case basis.
Concerns were raised that the Council have omitted the criteria “relates to compatibility with the character of surrounding area and adjacent land uses” in relation to the precautionary principle.	This criterion is covered in the main policy section under the bullet point B
Uncertainty was expressed around what imperative reasons could trump something that causes significant environmental damage.	Guidance is provided in the Defra Habitats Directive: guidance on the application of article 6 (4). Alternative solutions, imperative reasons of overriding public interest (IROPI) and compensatory measures (August 2012). It should be noted that all EU Environmental Regulations have been written into domestic law and will apply in the event of Brexit.

**Council response to key issues raised**

<b>Main Issue</b>	<b>Council Response</b>
One respondent requested to see a reduction in landfill and suggested that the Council should explore alternative means of dealing with and disposing of waste.	The Council agree with this statement and the overall policy direction is to move towards a more sustainable waste management system and the circular economy.

## Council response to key issues raised

### Policy W2 – Waste collection and treatment facilities

#### Summary of Responses

One respondent provided comments in relation to Policy W2, which can be summarised as follows:

- One respondent supported the broad approach of the policy.

#### Responses received

Reference	Respondent
DPS-B-AM-S	Belfast Harbour

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support was expressed for the broad approach of the policy.	BCC welcome your support for this policy.

## Policy W3 – Waste disposal

### Summary of Responses

Two respondents provided comments in relation to Policy W3, which can be summarised as follows:

- Two respondents supported the broad approach of the policy.

### Responses received

Reference	Respondent
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent felt that the policy fails test C3 and advised that articulation of reference to heritage interests would make it more consistent with the SPPS and suggested a change of wording.	The protection of built heritage is set out in Policies BH1, BH2, BH 3& BH4. The LDP needs to be read as a whole plan. No policies can be considered in isolation.
Support was expressed for the broad approach of the policy.	BCC welcome your support for this policy.

## Council response to key issues raised

### Policy W4 – Land improvement

#### Summary of Responses

One respondent provided comments in relation to Policy W4, which can be summarised as follows:

- One respondent supported the broad approach of the policy.

#### Responses received

Reference	Respondent
DPS-B-AM-S	Belfast Harbour

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support was expressed for the broad approach of the policy.	BCC welcome your support for this policy.

## Policy W5 – Development in the vicinity of waste management facilities

### Summary of Responses

One respondent provided comments in relation to Policy W5, which can be summarised as follows:

- One respondent supported the broad approach of the policy.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support broad approach.	BCC welcome your support for this policy.

## Council response to key issues raised

### Policy M1 – Minerals

#### Summary of Responses

Six respondents provided comments in relation to Policy M1, which can be summarised as follows:

- Five respondents raised the issue of the absence of designations for 'Areas of Constraint on Mineral Development' in accordance with SPPS.
- One respondent opposed to the use of cyanide for mineral extraction.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	National Trust
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-U5-N</a>	Department of Infrastructure
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency

Reference	Respondent
<a href="#">DPS-B-UQ-H</a>	Department of Communities - Historic Environment Division
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Five respondents raised the issue of the absence of designations for 'Areas of Constraint on Mineral Development' in accordance with SPPS. Concern was raised that areas of intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage) would not be adequately protected.	It is considered that the policy approach outlined in the dPS provides the appropriate protection of the environment (natural and built) from mineral development. Protection is ensured through other policy designations, including policies NH1 and LC1-4. If appropriate, further protection can be provided at the next stage of the LDP, the Local Policies Plan stage which will consider site specific designations.
One respondent opposed to the use of cyanide for mineral extraction and suggested the LDP should not allow mineral extraction by way of using cyanide on the basis of environmental and health risks.	Controlling the use of cyanide for mineral extraction is considered outside the remit of this plan.



## Transportation - general

### Summary of Responses

Eleven respondents provided comments in relation to Section 9.4 Transportation, which can be summarised as follows:

- Three respondents commented on the lack of evidence on the origin and destination of trips outside the Belfast boundary and the relationship with neighbouring councils.
- Two respondents stated that Belfast City Council should provide updated transport evidence in absence of a new Transport Plan.
- Four respondents commented on the absence of an up to date transport plan.
- One respondent made a specific comment about missed transport opportunities to connect the city.
- Two respondents focussed on the need for a co-ordinated approach with neighbouring councils.
- One respondent commented that they expected an assessment on whether growth can be accommodated on the existing/ planned transport network.

### Responses Received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-QW-K</a>	Organisation
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-U4-M</a>	Sustrans, Northern Ireland
<a href="#">DPS-A-XQ-M</a>	Individual
<a href="#">DPS-B-AZ-6</a>	George Best City Airport

Reference	Respondent
<a href="#">DPS-B-86-S</a>	Organisation
<a href="#">DPS-B-9D-8</a>	Shared City Partnership
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council
<a href="#">DPS-B-86-S</a>	Organisation
<a href="#">DPS-B-UF-6</a>	Ashton Community Trust

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
It was suggested that there is no substantial reference to the need for a change in how people travel to enable the planned growth to be delivered in line with the other Council objectives.	The policies contained in the Transportation section on Page 205– 221 outline an approach to deliver sustainable patterns of development which reduce the need to travel and policies which clearly prioritise active travel and travel by public transport. The draft Plan Strategy introduction highlights the challenge to accommodate growth and improve accessibility into and throughout the city whilst also discouraging single occupancy private car use for

## Council response to key issues raised

Main Issue	Council Response
	<p>commuting. The draft Policy TRAN 3 will require a Transport Assessment to evaluate transport implications of development proposals and the need for a travel plan in the situations where they are likely to generate significant travel. Policy TRAN 5 – New Transport Schemes safeguards land required to implement new transport proposals or planned improvements to the network. The policy states that “measures to make best use of the existing network and improve accessibility for all modes of travel and in particular for alternatives to the car will be promoted”.</p>
<p>It was stated that the terms access, accessible, accessibility are used variably across the document with implied different meanings and do not appear in the glossary.</p>	<p>The terms are used in the same way with the same meaning as they appear in the RDS, SPPS, and PPS 3 and PPS 13.</p>
<p>Concern expressed that in places where transport travel time accessibility would be expected to appear in the dPS, it is missing. Transport travel time (accessibility) is pivotal in designating density of housing/ location of employment and parking standards. The development of locations with good accessibility should ensure that the potential use of sustainable modes is maximised across the plan area</p>	<p>The dPS does not contain site specific zonings for development, this will be carried out at the next stage, at the Local Policies Plan along with any further accessibility analysis.</p>
<p>It was suggested that there is no clear recognition of the need for or the existence of a Parking Strategy. Also that DfI Roads should be involved in any parking studies to assess potential for areas of control or parking restrictions.</p>	<p>Technical Supplement 14: Transportation sets out the vision and objectives of the Council’s Car Parking Strategy and Action Plan. The Strategy has helped inform a number of policies within the draft Plan Strategy and the Transportation elements generally. Policy TRAN 8 clearly states that “in dealing with development proposals for car parking the emphasis will be to allow parking provision that will assist in reducing reliance of the private car in particular for commuting into the city, help tackle growing congestion and bring about a change in travel behaviour”. Policy TRAN 9 – Parking</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Standards within areas of parking restraint outlines reduced standards in the city centre and commercial areas outside Belfast City Centre. It was hoped that the draft Plan Strategy would be developed in parallel with the review of the BMTP or a new transport strategy which would commission parking studies and other studies by DfI to assess the potential to extend / amend areas of parking control and parking restrictions. However, as this was not possible, the Council proposed that any refinement or further designations would be appropriately addressed through next stage of the development plan, the local polices plan. This will be dependent on the Department, as the transport authority, progressing with the Transport Strategy and the Transport Plan which should inform the more detailed approach to the zoning of land and site specific provisions. The Council recognise the role of parking management in influencing modal shift and encouraging the use of more sustainable travel. However, it is the statutory role of the Department to deliver transport infrastructure projects and initiatives such as public transport enhancements, park &amp; ride and Residents Parking Schemes, which will be key to delivering future modal shift and in particular discouraging the adverse impacts of commuting into the city by the single occupancy private cars.</p>
<p>Concern was expressed that there is limited recognition of the issues surrounding trips starting and finishing outside the Council area and how BCC relates to neighbouring Council areas.</p>	<p>The Council recognises the need to encourage “a change in how people travel to enable planned growth” -as stated by DfI -and consider that placing residential development within the urban areas and closer to employment opportunities and other trip generators should ensure more sustainable transport options are both available and more viable. We believe that this approach to locate new homes within Belfast’s urban area is inherently more sustainable in terms of reducing the need to travel and encouraging walking and cycling rather than spatially dispersed across more suburban or peripheral locations. In the latter scenario, there are likely to be more journeys generated into the city</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>by less sustainable means of travel which Belfast's existing road networks are unlikely to be able to accommodate without significant additional investment. The Transportation introduction section highlights the issue of the 'large 'travel to work' area with just under half its workforce travelling from other areas' and a heavy reliance on the car for this journey. In addition the need to improve accessibility into and throughout the city whilst discouraging single occupancy private car use for commuting is identified as a challenge. The policy aims under this section clearly state the need 'to deliver sustainable patterns of development which reduce the need for motorised transport and prioritise active travel and travel by public transport'.</p>
<p>A view was expressed that the Council had limited appreciation of how aims/objectives around greenhouse gases and improving air quality might be achieved.</p>	<p>It is considered that the Council has a good appreciation on how to achieve a reduction in greenhouse gases and improve air quality. At a local level, Belfast City Council has an obligation to regularly review, assess and report on air quality under the Local Air Quality Management (LAQM) regime. Along with partner organisations the Council developed a new Air Quality Action Plan for the city for 2015 – 2020. In Belfast, there are four Air Quality Management Areas (AQMAs) in places where the air has been affected by pollution, principally nitrogen dioxide (NO<sub>2</sub>) from road transport. The Air Quality Action Plan aims to deliver improvements to our air quality and the promotion of the use of sustainable methods of transport to achieve compliance with the nitrogen dioxide European Limit Values by 2020. The air quality officer within the Council participated in working groups during the development of policies for the dPS and advised on these issues.</p>
<p>It was stated that Council should be aware that buses and trains are sustainable means of transport and they are "motorised transport".</p>	<p>Reduce the need for "motorised transport" is term used in the SPPS under the Regional Strategic Objectives for Transportation. The term is also used in recent DfI publications such as the Belfast City Centre Transport Framework 2017-2020, (Para 3.25) as a category separate from buses and trains and</p>

## Council response to key issues raised

Main Issue	Council Response
	the Dfl Guidance on the preparation of LDP policies for transport.
It was suggested that that there is significant future potential for the port to become a strategic marine transport hub.	Policy EC3 - Major employment and strategic employment locations directs new employment development towards the Belfast Harbour Major Employment location and the various designated SEL's in the city.
A point was made that re-using buildings reduces both waste and transportation costs - apparently some 25% of UK landfill is associated with demolition and other building waste.	Policy ENV 2 - Mitigating environmental change addresses this issue. The policy states 'development proposals should, where feasible, seek to avoid demolition and should consider how existing buildings or their main structures could be reused'.
Concern was expressed that there is no indication of plans or mention of a high speed efficient public transport system.	Policy TRAN 5 - New transport schemes will safeguard land required to implement new transport proposals or planned improvements to the transport network and includes new or enhanced public transport services. The responsibility for the delivery of transport initiatives lies with the Dfl.
It was suggested that the pattern of religiously-segregated housing estates with poor transport links to city centre jobs is another aspect of housing in the city that could usefully be addressed.	Policy SP7 recognises there is poor connectivity in some residential areas due to dominant road infrastructure and poorly designed housing areas. This overarching policy seeks to support the integration of sustainable transport networks and land use to improve connectivity.
One respondent supports building on existing village hubs but they should not detract from the central importance of the historic core of the city, and highlighted the importance of public transport links to the centre.	The Council would agree with this statement. It should be noted that Policy SP7 - Connectivity will support connectivity to and within the city by sustainable transport, walking and cycling.
It was stated that neighbourhoods suffer from transport inequalities in costs/time to access services elsewhere. Conversely, a transport infrastructure allows better access for the wider metropolitan/rural area to jobs and services than half the city (with low car ownership) actually enjoys.	Policy SP7 recognises there is poor connectivity in some areas of the city. This overarching policy seeks to support the integration of sustainable transport networks and land use to improve connectivity.

## Council response to key issues raised

Main Issue	Council Response
<p>A point was raised on zoning. It is noted that in other places the city centre zone omits the new transport hub and its hinterland, includes Sirocco lands, but excludes City Side. It is suggested a map designation for the 'centre', 'centre edge' and 'inner arterial' city would allow policies to achieve their aims. Neighbourhoods around the city core are being negatively impacted by excessive development and commuter parking was also raised.</p>	<p>The dPS does not contain detailed zonings for areas, this will be considered at the next stage, when carrying out the Local Policies Plan. The issue of on street commuter parking in neighbours is recognised in the plan. The responsibility for designating areas and implementing residents' parking schemes lies with the Department for Infrastructure. The Council is supportive of the approach and our Car Parking Strategy and Action Plan published in April 2018 states the following action as a priority "work with DfI and local communities to consider parking management for inner city areas, either through the implementation of on-street parking regimes or Residents Parking schemes."</p>
<p>A view was expressed that community infrastructure is crucial to promote shared access to space and services by providing connectivity through transport.</p>	<p>Policy SP7 recognises there is poor connectivity in some areas of the city. This overarching policy seeks to support the integration of sustainable transport networks and land use to improve connectivity.</p>
<p>A number of respondents raised issues in relation to the publication of the dPS in advance of an updated Transport Strategy. Issues relate to the implications for growth of Belfast City Council along with other neighbouring councils and the lack of up to date transport evidence</p>	<p>The draft Plan Strategy was developed on the basis that the BMTP 2004 will continue to be the extant plan, alongside other strategic Transport Statements, until such times as the said replacement is adopted. This approach reflected that for the adoption of BMAP in 2014 – which was progressed some 10 years after the transport plan. There was also a review of the context in terms of the transport interventions and proposals, which were brought forward after the publication of the BMTP. The Interim Belfast City Centre Transport Framework review undertaken in 2016 was carried out to consider the implications of significant new development, predominantly in the city centre, which was either currently under construction or already had planning permission. This point is particularly pertinent as through that process the volume of planning approvals which had gone through the process were highlighted, in terms of the extent of development considered in the context of all material considerations at that time. As part of the decision making governance</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>structures, the transport and water and other infrastructure agencies were content with the scale and location of developments proposed. Whilst the growth aspirations for Belfast undoubtedly appear ambitious they need to be considered against the backdrop and scale of permissions already granted, as a baseline position for the city, with direct and assessed implications or requirements for infrastructure already recognised by the relevant statutory authorities. Under the new two-tier LDP process, the proposal has always been to carry out more detailed analysis of transport impacts associated with specific sites at the Local Policies Plan Stage.</p>
<p>Reference was made to the issues of 'disproportionately high volume of travel by car to and within the city'.</p> <p>Concern that 'driver frustration' was cited in the dPS before road safety issues and pedestrian severance. In addition there is weak reference to 'associated emissions which can result in poor air quality', there is undisputed evidence that car emissions cause poor air quality.</p>	<p>At a local level, Belfast City Council has an obligation to regularly review, assess and report on air quality under the Local Air Quality Management (LAQM) regime. Along with partner organisations the Council developed a new Air Quality Action Plan for the city for 2015 – 2020. In Belfast, there are four Air Quality Management Areas (AQMAS) in places where the air has been affected by pollution, principally nitrogen dioxide (NO<sub>2</sub>) from road transport. The Air Quality Action Plan aims to deliver improvements to our air quality and the promotion of the use of sustainable methods of transport to achieve compliance with the nitrogen dioxide European Limit Values by 2020. The Council recognise that air quality is a serious issues and the Council's air quality officer participated in working groups during the development of policies for the dPS and advised on these issues.</p>
<p>Respondent stated the importance of the airport as a key gateway which has a regional role, providing strong connectivity to locations outside of Belfast to the rest of the UK and beyond. The RDS seeks to deliver a balanced approach to transportation infrastructure by improving connectivity and this should be reflected in the LDP aims.</p>	<p>Figure 9.2 will be updated to include the airport. <b>See Minor Modifications table.</b></p>

## Council response to key issues raised

Main Issue	Council Response
Figure 9.2 should be updated to include the airport.	
One respondent stated that Paragraph 9.4.3 should also make reference to the departments extant transport plan.	The proposed addition will made. <b>See Minor Modifications table.</b>



## Policy TRAN 1 – Active travel – walking and cycling

### Summary of Responses

Six respondents provided comments in relation to Policy TRAN 1, which can be summarised as follows:

- One respondent stated that the policy wording implies permission will be granted where walking and cycling have been considered.
- Three respondents supported TRAN 1 welcoming the provision for active travel in development proposals and links to Belfast Bicycle Network and Green and Blue Infrastructure Plans.
- One respondent requested a 'buffer' for provision of walking, cycling and public transport links to a development proposal.
- One respondent requested a wider application of TRAN 1 to all development proposals.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U4-M</a>	Sustrans, Northern Ireland
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent stated that the policy wording implies permission will be granted where walking and cycling have been considered. The view was expressed that this should be made clear this is just one consideration.	The LDP should be read as a whole with no policy considered in isolation.
A request was made for a 'buffer' (i.e. within x m of the site) for provision of walking, cycling and public transport links to a development proposal.	The Council do not consider it necessary to include a buffer i.e. within x m of the site. It is considered to be too prescriptive and current DfI 'Guidance on the preparation of LDP policies for transport' does not provide this detail within their best practice policy wording.
A view was expressed that Belfast needs to get away from car reliance,	The Council would agree with this statement. The policies contained in the Transportation section on Page 205– 221 outline an approach to deliver

## Council response to key issues raised

Main Issue	Council Response
<p>have better public transport, safer cycling &amp; permeability.</p>	<p>sustainable patterns of development which reduce the need to travel and policies which prioritise active travel and travel by public transport. The draft Plan Strategy introduction highlights the challenge to accommodate growth and improve accessibility into and throughout the city whilst also discouraging single occupancy private car use for commuting. Policy SP7 recognises there is poor connectivity in some residential areas due to dominant road infrastructure and poorly designed housing areas. This overarching policy seeks to support the integration of sustainable transport networks and land use to improve connectivity. A number of more detailed policies within the strategy also seek to promote higher quality design for development proposals such as Policy DES 1 and supplementary guidance will be produced to give further guidance to developers.</p>
<p>A proposal was made that Policy TRAN 1 should apply to all developments.</p>	<p>The application of TRAN 1 measures should be appropriate and proportionate to a particular development proposal to encourage active travel and will depend on its scale, location and use. It would not be appropriate to apply to all development proposals.</p>

## Policy TRAN 2 – Creating an accessible environment

### Summary of Responses

Two respondents provided comments in relation to Policy TRAN 2, which can be summarised as follows:

- One respondent strongly supported TRAN 2 as it will promote an inclusive environment.
- One respondent sought a change to TRAN 2, stating it should apply to developments on arterial routes in addition to public buildings and education/employment purposes.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

Reference	Respondent
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent strongly supported this policy, which ensures equality of access for those with a disability and for those whose mobility is impaired. This will aid the promotion of an inclusive environment, allowing all people to connect with other people, employment opportunities, and services in their neighbourhood, and across the Belfast City.	BCC welcome support for the policy
It was suggested that Policy TRAN 2 should apply to arterial routes in addition to public buildings and education/employment purposes.	An amendment to the policy is not considered appropriate. Policy TRAN 2 applies to all development proposals that are open to the public or to be used for employment or educational purposes including proposals along arterial routes. In addition, Policy HOU 7 - Adaptable and accessible accommodation applies to all new homes, requiring them to be flexibly designed so they are adaptable throughout all stages of life. The policy will be applied where it is appropriate and proportionate to do so.

## Council response to key issues raised

### Policy TRAN 3 – Transport assessment

#### Summary of Responses

Three respondents provided comments in relation to Policy TRAN 3 which can be summarised as follows:

- Two respondents were generally supportive.
- One respondent suggested a change to wording to strengthen the policy.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-B-8J-D</a>	NIHE

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
There was support for the policy to promote transport as a key consideration that needs to be taken account of in the initial stages of new developments proposals.	BCC welcome support for the policy
A suggestion was made that reference to Supplementary Planning Guidance 'must be considered' rather than 'should' to ensure that enough information is provided on how a proposed development will function in transport terms.	DfI are the transport authority and as such, a statutory consultee in relevant and appropriate planning applications. BCC use all guidance at its disposal from DfI.
Reference was made that Transport Assessments should be applied to all developments where it is likely they will impact on current modes and flows of transport, particularly large housing developments.	The Council agree with this statement. Under TRAN 3, development proposals will be expected to produce a comprehensive Transport Assessment where they are likely to have transport implications. Measures to mitigate any adverse impacts and deliver sustainable measures will be required under Policy TRAN 4 Travel Plan. BCC will continue to consult DfI on planning applications.

## Policy TRAN 4 – Travel plan

### Summary of Responses

Four respondents provided comments in relation to Policy TRAN 4, which can be summarised as follows:

- Two respondents were generally supportive of the policy.
- Two respondents raised issues relating to monitoring, implementation and reporting.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-9Z-X</a>	Sinn Fein

Reference	Respondent
<a href="#">DPS-B-UK-B</a>	Market Development Association
<a href="#">DPS-B-8J-D</a>	NIHE

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Support was expressed for policies promoting transport as a key consideration that needs to be taken account of in the initial stages of new developments.	BCC welcome support for this policy.
There was a query about how Travel Plans would be managed, monitored and enforced.	If the travel plan is material to consent, BCC will monitor travel plans and take enforcement action as necessary in consultation with the relevant statutory partners.
One respondent felt that the creation of travel plans for major developments such as schools and hospitals with targets will positively encourage people to travel sustainably and allow plans to be assessed.	The requirements under TRAN 4 Travel plan will ensure the assessment of all modes are considered but the initial emphasis will be on sustainable modes such as walking, cycling and public transport. This will include setting out clear targets and monitoring of progress.
There was a view that Policy TRAN 4 would allow wider Active Travel routes to be mapped out and link up to the Belfast Bicycle Network.	It is anticipated that TRAN 4 will encourage more people to travel sustainably, Policy GB1 and the Public Open Spaces Strategy and Green and Blue infrastructure plan will also contribute to additional infrastructure linking up Belfast and creating further linkages to the Belfast Bicycle Network.

## Council response to key issues raised

### Policy TRAN 5 – New transport schemes

#### Summary of Responses

The main comment on TRAN 5 related to the absence of an up to date transport survey to inform the policy.

#### Responses received

Reference	Respondent
<a href="#">DPS-A-6X-S</a>	Translink

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Concern was expressed over the availability of an up to date transport survey to inform the policy to safeguard land required to implement new transport proposals or planned improvements to public transport services, park and ride proposals and road schemes.	This is a current operational policy contained in PPS 3 transferred into the dPS as guided by Dfl. This approach is consistent with the policy approach outlined in SPPS and in the Dfl 'Guidance on the preparation of LDP policies for Transport. TRAN 5 will safeguard land required to implement new transport proposals or planned improvements to the transportation network as identified in the Dfl's extant transport plan. It is expected that detailed evaluation of any transport project will be carried out by DFI. The absence of the protection of land for schemes until the revised Belfast Transport Plan is published would not be acceptable as it may allow development proposals to proceed which would prejudice the implementation of future schemes.

## Policy TRAN 6 – Access to public roads

### Summary of Responses

One respondent commented on TRAN 6 implementation.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (DfI)

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent suggested that access arrangements to public roads should be an integral part of any planning application delivered through planning condition or Section 76 Planning Agreement as appropriate.	The Council agree and have identified Section 76 Planning Agreements as a delivery mechanism at the end of the policy section. Where appropriate conditions will be used instead of, or in addition to, a Planning Agreement to secure adequate access arrangements. The wording of the policy is closely aligned to PPS3 and DfI will be consulted on relevant planning applications, as statutory consultee with responsibility for traffic and transport.

## Council response to key issues raised

### Policy TRAN 7 – Access to protected routes

#### Summary of Responses

Two respondents commented on TRAN 7 and the main issues are summarised below:

- The lack of up to date evidence to inform the policy was raised.
- A number of minor changes to wording and clarifications were requested.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (DfI)

Reference	Respondent
<a href="#">DPS-A-6X-S</a>	Translink

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
One respondent stated that it is not expected to deliver access onto protected routes through Section 76 Planning Agreements.	The indication can be removed from the delivery table. <b>See minor modifications table.</b>
Clarification was requested about the definition in the justification and amplification text of 'significantly add to congestion' and whether this would be restricted to the immediate locality or wider network.	Development proposals which require new access to protected routes will be considered in consultation with DfI. The term 'significantly add to congestion' was taken directly from PPS13 Policy AMP 3.  The main consideration is that it will not compromise the function of facilitating the free and safe movement of road users, also that "Access arrangements must be in accordance with the DfI's published guidance."
There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, would inform the provisions of the policy which makes no provision for public transport facilities, such as Park and Ride facilities, to access protected routes.	This is current operational policy and has been transferred from PPS 3. The approach is consistent with the policy guidance outlined in SPPS and the DfI 'Guidance on the preparation of LDP policies for Transport'. The regional strategic objectives outlined within the SPPS under transportation state 'restrict the number of new accesses and control the level of use of existing accesses onto Protected Routes'.



## Council response to key issues raised

Main Issue	Council Response
<p>One respondent stated that there is a requirement for the LDP to include a robust evidence base specifically in relation to Transportation.</p>	<p>BMTP (2004) is the current transport plan and will continue to be the extant plan until such times as the proposed replacement is adopted. This pragmatic and tested approach was illustrated with the adoption of BMAP in 2014 some 10 years after the Transport plan. The interim Belfast City Centre Transport framework review undertaken in 2016 was in part an attempt to assess the current position and potentially plan for the impact of major new development in the city centre.</p>
<p>Concern was raised that BCC had not undertaken an accessibility analysis in the location and design of development, as directed by PPS 13</p>	<p>The dPS does not outline site specific zonings therefore accessibility analysis has not been carried out. Under the new two tier LDP process, the proposal has always been to carry out more detailed analysis of transport impacts associated with specific sites at the Local Policies Plan Stage.</p>
<p>Concern was raised that the council did not appear to have taken account of policy and guidance issued by the Department and undertaken a transport survey and new evidence (required under SPPS and PPS13)</p>	<p>The Council referred to the Belfast City Centre Transport Framework 2017-2020 which was prepared by the Department for Infrastructure in consultation with the Council including Transport NI and Translink. This framework undertook a number of key stages of assessment for Belfast including assessment of the current transport demand and capacity. This recent evaluation provided the background to the transportation policy section.</p>
<p>The issue that the draft Plan Strategy has been formulated in advance of the 'Regional Strategic Network Transport Plan', the 'Belfast Metropolitan Strategy' and the 'Belfast Metropolitan Transport Plan' all of which are being prepared by the Department for Infrastructure was raised.</p> <p>With no up-to-date transport plan for Belfast, the dPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such</p>	<p>It is unfortunate that the Dfl element of a combined approach has fallen behind schedule in terms of the delivery of a new transport plan for the metropolitan area. However, it does not follow that this failure affects the soundness of the dPS particularly at this early dPS stage. The current Transport Plan (BMTP 2004) alongside the further assessment work undertaken will continue to be the extant plan until such times as the proposed replacement is adopted. This pragmatic and tested approach was amply illustrated with the adoption of BMAP in 2014</p>

## Council response to key issues raised

Main Issue	Council Response
times as further detailed information is available.	some 10 years after the transport plan. Further the Interim Belfast City Centre Transport Framework review undertaken in 2016 was in part an attempt to assess the current position and potentially plan for the impact of major new development in the city centre that was either currently under construction or already had planning permission

## Policy TRAN 8 – Car parking and servicing arrangements

### Summary of Responses

Thirteen respondents provided comments in relation to Policy TRAN 8, which can be summarised as follows:

- Eight respondents outlined the need for more flexibility in applying parking standards to commercial and residential development.
- Four respondents were generally supportive of the policy.
- Four respondents commented on the evidence base.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-AG-K</a>	Carvill Developments Limited

Reference	Respondent
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter
<a href="#">DPS-A-6X-S</a>	Translink
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-9Z-X</a>	Sinn Fein
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-U4-M</a>	Sustrans

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main issue	Council Response
<b>Residential Parking Standards</b>	
The need for a flexible approach to residential parking standards was expressed, along with the view that 1 space per residential unit is contrary to city centre living and densification.	TRAN 8 allows flexibility on parking provision in highly accessible locations and encourages provision of car parking that will assist in reducing reliance on the private car. Flexibility is already applied to residential proposals in the city centre where appropriate.

## Council response to key issues raised

Main issue	Council Response
<b>Commercial Parking Standards</b>	
<p>A number of respondents identified the need for flexibility on parking standards for commercial developments in areas with poor access to public transport.</p>	<p>TRAN 8 allows flexibility on parking provision and if exceptional circumstances can be demonstrated then provision in excess of the requirements will be permitted.</p>
<p>Four respondents were generally supportive of the policy, with one adding that they don't feel the policy wording will disincentivise car use.</p>	<p>BCC welcome support for this policy. In addition, the policies contained in the Transportation section on Page 205– 221 outline an approach to deliver sustainable patterns of development which reduce the need to travel and policies which clearly prioritise active travel and travel by public transport.</p>
<p>There was concern that the policy has not taken into consideration relevant plans and policies such as the Belfast Agenda or the Belfast City Centre Regeneration and investment Strategy. Also the Belfast City Council's Car Parking Strategy and Action plan was not provided as evidence.</p>	<p>The Belfast Agenda and The City Centre Regeneration and Investment Strategy contain a range of objectives from creating a prosperous economy along with promotion of a connected and environmental sustainable city. The dPS seeks to deliver a balanced approach, which will promote sustainable patterns of development and integrate land use and transportation planning. The Belfast City Centre Regeneration and Investment Strategy identified transport and connectivity as playing a significant role in the economic growth and regeneration of Belfast and recommended the development of the BCC Car Parking Strategy. The BCC Car Parking Strategy is publicly available on the Council's website since April 2018 <a href="https://www.belfastcity.gov.uk/buildingcontrol-environment/regeneration/car-park-strategy.aspx">https://www.belfastcity.gov.uk/buildingcontrol-environment/regeneration/car-park-strategy.aspx</a> and was used to inform the policies relating to transport and car parking including TRAN 8.</p>

## Council response to key issues raised

Main issue	Council Response
Reference was made to the need for preparation of a robust evidence base/survey/transport plan to determine the impacts that the proposed car parking guidelines would have on the provision of public transport and on the highway network.	TRAN 8 is a current operational policy contained in PPS 3 transferred into the dPS as guided by Dfl. There is no change to the policy approach.
A change was requested to the term 'Dfl standards' which should be replaced with 'Published standards'	<b>See Minor Modifications table.</b>
It was stated that Creating Places guidance should be considered and 'car free' residential developments.	TRAN 8 does not prevent car free residential developments in appropriate locations. It encourages provision of car parking that will assist in reducing reliance on the private car and allows flexibility on parking provision in highly accessible locations. Creating Places guidance is not superseded by the dPS.
Reference to accessibility analysis should be carried out on current zonings to assess impact on existing & planned changes to bus & rail networks.	The dPS does not contain site specific zonings for development, this will be carried out at the next stage along with the required accessibility analysis.
It was stated that a number or a trigger point should be set for when electric vehicle charging points are required.	It is not considered appropriate to include this level of detail in the policy. The need for electric charging points will be assessed against the characteristics of the development and its size and location.

## Council response to key issues raised

### Policy TRAN 9 – Parking standards within areas of parking restraint

#### Summary of Responses

Thirteen respondents provided comments in relation to Policy TRAN 9, which can be summarised as follows:

- Seven respondents state that the evidence base to support the policy is not provided i.e. the Council's Car Parking Strategy as referred to in Technical Document 14
- The absence of an up to date transport survey/plan/evidence to formulate parking standards was raised.
- It was stated that the policy refers to existing standards (transferred from BMAP) and therefore does not relate to density designations.
- A number of respondents support reduced parking standards in areas of parking restraint.
- Two respondents state that the aim to secure higher density residential development is at 'at odds' with parking policy provision of 1 car.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-U9-S</a>	ARdMackel Architects
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter

Reference	Respondent
<a href="#">DPS-A-6X-S</a>	Translink
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus Healthcare Developments (HK) Ltd
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institute
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade & Commerce

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Concern was raised that the evidence base to support the policy is not provided i.e. The Council's Car Parking Strategy referred to in Technical Document 14	Policies from PPS13 and PPS3 in addition to the work done on creating policies for BMAP have all contributed to the creation of the Policy TRAN 9. The dPS has not departed from the policy position set out in PPS3 and PPS13. BCC Car Parking Strategy has been publicly available on the Council's website since April 2018

## Council response to key issues raised

Main Issue	Council Response
	<p><a href="https://www.belfastcity.gov.uk/buildingcontrol-environment/regeneration/car-park-strategy.aspx">https://www.belfastcity.gov.uk/buildingcontrol-environment/regeneration/car-park-strategy.aspx</a> and it contains up to date analysis of parking demand and supply in the city.</p>
<p>There was concern that the policy refers to existing standards (transferred from BMAP) and does not relate to density designations, suggesting this requires further work</p>	<p>The dPS does not contain specific zonings for areas of parking restraint, this will be carried out at the next stage. Under the two tier LDP process, the site specific designations will be considered at Local Policies Plan stage.</p>
<p>One respondent commented on the lack of up to date evidence to determine the impact of the proposed car parking guidelines on the provision of public transport and on the highway network.</p>	<p>This policy is in line with the SPPS which states that the LDP can consider a range of initiatives such as designating areas of parking restraint. The dPS does not contain specific zonings for areas of parking restraint, this will be carried out at the next stage along with the required accessibility analysis.</p>
<p>It was suggested that to facilitate city centre living and secure higher density development there should be no minimum number of parking spaces provided per dwelling.</p>	<p>TRAN 9 does not prevent car free residential developments in appropriate locations. It encourages provision of car parking that will assist in reducing reliance on the private car and allows flexibility on parking provision in highly accessible locations.</p>

**Policy TRAN 10 – Design of car parking**

**Summary of Responses**

Three respondents provided comments in relation to Policy TRAN 10, which can be summarised as follows:

- One respondent was supportive of a flexible approach to parking provision for social housing developments
- One respondent noted that commuter parking can be problematic in some areas and there is no reference to residents’ parking schemes in the draft Plan Strategy.
- One respondent commented that an active frontage is an important element of design when considering multi-level and basement parking.
- One respondent sought clarity on the criteria to be used for reductions in car parking provision for developments and if there would be local consultation.
- One respondent noted that Belfast bikes could make a contribution to park n ride.

**Responses received**

Reference	Respondent
<a href="#">DPS-A-1R-E</a>	Organisation
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive

**Main Issue(s) raised by respondent(s) and Belfast City Council’s response**

Main Issue	Council Response
One respondent was supportive of parking and transport policies that encourage sustainable travel. They were supportive of the flexible approach to parking standards, within social housing developments, due to the lower levels of car ownership amongst social housing tenants.	BCC welcome support for this policy.
One respondent stated that Car Parking Strategies and Residents’ Parking schemes are integral in addressing the high levels of commuter parking and should be prioritised to manage the growing population.	Technical Supplement 14: Transportation sets out the vision and objectives of the Council’s Car Parking Strategy and Action Plan. The Strategy has helped inform a number of policies within the draft Plan Strategy and the Transportation elements generally. Policy TRAN 8 clearly states that “in dealing with development proposals for car parking the emphasis will be to allow parking provision that will assist in reducing reliance of the private car in particular for



## Council response to key issues raised

Main Issue	Council Response
	commuting into the city, help tackle growing congestion and bring about a change in travel behaviour”.
LDP has failed to clarify the role of Belfast City Council in leading the Car Parking Strategy.	The Council’s Car Parking Strategy and Action Plan is a separate document from the LDP and contains actions and recommendations outside the remit of the LDP. However, it provided support for the policy approach outlined in the dPS.
There is no reference given to any existing funding or resources and implementation and consultation with residents to consider the resident parking schemes and on-street parking scheme for businesses.	The responsibility for designating areas and implementing residents' parking schemes lies with the Department for Infrastructure, however there has been limited progress on delivering schemes. It is anticipated that the Department will consider this approach through the revised Belfast Transport Strategy and Plan process which is currently underway. The Council is supportive of the approach and our Car Parking Strategy and Action Plan published in April 2018 states the following action as a priority “work with DfI and local communities to consider parking management for inner city areas, either through the implementation of on-street parking regimes or Residents Parking schemes.”
One respondent noted that the council considers, in certain instances it will no longer be appropriate or desirable for developers to fully meet demand for car parking generated by their developments; although there is no reference to the criteria that will be used to identify the right level of reduction and the level of local consultation.	Policy TRAN 8 outlines circumstances where a reduced level of car parking provision may be acceptable: a. Where demonstrated through a TA, it forms part of a package of measures to promote alternative transport modes; b. Where the development is in a highly accessible location well served by public transport; c. Where the development would benefit from spare capacity available in nearby public car parks or adjacent on street car parking; d. Where shared car parking is a viable option; or e. Where the exercise of flexibility would assist in the conservation of the built

## Council response to key issues raised

Main Issue	Council Response
	<p>or natural heritage, would aid rural regeneration, facilitate a better quality of development or the beneficial re-use of an existing building. In addition for major developments where it is likely to have significant travel generating the transport assessment may be accompanied by a travel plan outlining mitigation measures. Any development proposal will be subject to neighbourhood notification.</p>
<p>A comment was made that the Belfast bicycle scheme could fill the gap between park n ride schemes and city centre instead of private cars. Belfast Bikes should also extend its range of offerings and include hire of adapted bikes to enable those with a range of disabilities to get around the city.</p>	<p>The expansion of Belfast Bikes is outside the remit of the LDP. However the Council as part of the Belfast Agenda is committed to increase the use of cycling and the expansion of Belfast Bikes is one element to achieve this goal.</p>
<p>A comment was made on the need for investment on crosstown and inter-linking routes, which would encourage people to use public transport.</p>	<p>Investment in transport infrastructure and delivery of transport initiatives is the responsibility of DfI. The Council will safeguard land required to implement new transport proposals or planned improvements to the transportation network through Policy TRAN 5. This includes new and improved walking and cycling routes, enhanced or new public transport services, park and ride proposals and road schemes.</p>
<p>There was a view that the term 'active frontage' should be included in Design of car parking for multi-level and basement parking at street level.</p>	<p>Policy TRAN 10 states that multi-level and basement car parks "requires careful attention to ensure that they are safe to use and do not have a negative impact at street level by the creation of a dead frontage".</p> <p>Policy DES1 in the draft Plan Strategy also promotes uses that provide active frontages and inclusive design that support safety and reduce the opportunity for crime and anti-social behaviour.</p>

## Policy TRAN 11– Provision of public and private car parks

### Summary of Responses

Five respondents provided comments in relation to Policy TRAN 11, which can be summarised as follows:

- One respondent was generally supportive of the Policy and two respondents supported the retention of the current level of parking provision in the city centre and the development of Multi Storey Car Parks.
- One respondent felt that Tran 11 contradicts the Council's Car Parking Strategy & Action Plan.
- One respondent commented that demand management would make car use less attractive and encourage sustainable transport.
- One respondent stated that the evidence base is not robust.
- One respondent identified legislation, policy and guidance, which has not been taken into account.
- One respondent commented that even if the existing provision of commuter parking was retained, a significant modal shift would still be required to support new jobs.
- One respondent commented on the absence of an up to date Transport Plan and no reference to the Council's Car Parking Strategy.
- Two respondents felt the presumption against long stay parking is contrary to the jobs target.

### Responses Received

Reference	Respondent
<a href="#">DPS-A-6Q-J</a>	Project Hope
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive
<a href="#">DPS-A-HQ-4</a>	Belfast Chamber of Trade & Commerce

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-6X-S</a>	Translink

### Main Issue(s) raised by respondent(s) and Belfast City Council's responses

Main Issue	Council Response
Support was expressed for the policy which make travelling by a private car less attractive and encouraging people to use sustainable methods of travel, such as walking, cycling and public transport.	BCC welcome your support
Support was given to a flexible approach to parking standards, within social housing developments, due to the lower levels of car ownership amongst social housing tenants.	BCC welcome your support

## Council response to key issues raised

Main Issue	Council Response
<p>It was stated that policy TRAN 11 contradicts the Belfast City Council's Car Parking Strategy and Action Plan. Further comment was made that the Belfast City Council document states that the current number of car parking spaces should be retained and that new multi-storey car parks should be provided as surface car parks are redeveloped. It was suggested that the high cost of car parking in the city centre is a real deterrent to the retail and associated economy, as retail parks in the suburbs offer free parking.</p>	<p>An objective of the Council's Car Parking Policy and Action Plan is to ensure appropriate provision and location of car parking to support and improve the economic vitality of the city centre and district centres. In relation to Council owned off street provision an action is to "retain all council sites but with a view to incorporation within MSCP provision." It does not state that all current numbers should be retained as the responsibility for majority of the current provision lies outside the council's control. TRAN 11 relates to the provision of new public and private car parking and is in line with the objectives and vision of the Council's strategy.</p>
<p>It was suggested that the overwhelming presumption against long stay/commuter parking is damaging to the aspirations of providing 46,000 new jobs in the city. Even if the existing provision of commuter parking was retained this would require a very significant modal shift towards sustainable forms of transport to support the new jobs. Therefore it was viewed that to attempt to reduce the number of commuter parking spaces is highly unrealistic and will work against the stated target of 46,000 new jobs.</p>	<p>The policy approach outlined in the dPS is in line with the regional strategic objectives outlined in the SPPS under Transportation "promote parking policies that will assist in reducing reliance on the private car and help tackle growing congestion".</p> <p>TRAN 11 relates to the provision of new public and private car parking and is in line with the objectives and vision of the Council's strategy.</p> <p>An objective of the Council's Car Parking Policy and Action Plan is to ensure appropriate provision and location of car parking to support and improve the economic vitality of the city centre and district centres. The dPS recognises that "car parking in suitable amounts and locations is vital for the city centre to function properly; however a balance is necessary between car parking and other transport modes and between the needs of short –stay and long stay parking users."</p>
<p>There was a view that 'Development' car parking should be avoided in favour of flexible public spaces in multi-storey car</p>	<p>The precise amount and type of car parking for development proposals will be determined according to the specific</p>

## Council response to key issues raised

Main Issue	Council Response
<p>parks. It was suggested that this form of parking is much more sustainable as the same space can be used by different users throughout the day and overnight, instead of being for the sole use of users of a development.</p>	<p>characteristics of the development and its location having regard to the DfI's published standards or any reduction provided for in an area of parking restraint. Policy TRAN 8 states that where development would benefit from spare capacity available in nearby public car parks or adjacent on-street car parking a reduced level of provision may be acceptable.</p>
<p>The need for the preparation of a robust evidence base to include a survey of the transport system and traffic of the district and the preparation of a local transport study was raised, which includes a co-ordinated cross Council boundary approach to the provision of Park and Ride facilities.</p>	<p>It should be noted that the surrounding councils were statutory consultees in the LDP process and have been involved in the Metropolitan Area Spatial Working Group (MASWG) along with DfI and other statutory representatives. The MASWG was established by Belfast City Council to provide a forum for engagement on cross-boundary issues to be discussed along with the broader LDP development process. The Council is also providing feedback to POP documents and draft strategies to ensure consideration is given to sustainable transport options for commuting to Belfast.</p>
<p>It was stated that BCC has not taken legislation, policy or guidance into account in the preparation of the LDP. The LDP has been prepared in absence of an up to date Transport Plan.</p>	<p>The draft Plan Strategy was developed on the basis that the BMTP 2004 will continue to be the extant plan, alongside other strategic Transport Statements, until such times as the said replacement is adopted. BCC Car Parking Strategy published in April 2018 contains analysis of parking demand and supply in the city. Further analysis and designations such as park and ride sites will be considered at the local policies plan along in conjunction with DfI.</p>

## Council response to key issues raised

### Policy TRAN 12 – Temporary car parks

#### Summary of Responses

No representations have been made in respect of **Policy TRAN 12**.

## ENV1 – Environmental quality

### Summary of Responses

Seven respondents provided comments in relation to **policy ENV1**. Of the comments submitted:

- Two respondents provide general comments of support of which one respondent supports the objective to protect local communities and the environment from harmful effects that could arise from development;
- One respondent states that further clarification is needed regarding "unacceptable adverse impact" and whether thresholds or a series of triggers are to be proposed;
- One respondent states that policy is too vague and should take a proactive approach to address issues such as air pollution and traffic congestion generated from commuters;
- One respondent states that policy is unsound as it fails to address issues on waste/contaminated land legislation that may have implications for BCC;
- One respondent states that policy should apply to all brownfield sites and have greater material weighting;
- One respondent states that policy is unsound and goes beyond DAERA's guidance on the management of quiet areas and therefore requests the removal of certain wording.

*It is noted that representation has been made regarding Technical Supplement 16- Environmental Issues, this guidance is linked to Policy ENV1- Environmental Quality. This issue has been outlined below.*

### Responses received

	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-AZ-6</a>	George Best City Airport
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

	Respondent
<a href="#">DPS-B-UK-B</a>	Markets Development Association
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency (NIEA)
<a href="#">DPS-A-Q3-F</a>	Ireland Brownfield Network

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
What is "unacceptable adverse impact" and are triggers to be used for air quality	Regarding clarification of "unacceptable adverse impact", this is universally-accepted planning term in common usage. It covers a range of considerations and each case is assessed on its

## Council response to key issues raised

Main Issue	Council Response
	merit. It is not possible or appropriate to state specific triggers in the DPS.
Policy vague - air quality needs to address commuting and traffic congestion.	The dPS seeks to reduce car use throughout and into the city through other policies including those supporting active travel, public transport and the integration of land use and transportation. In addition, the BCC Air Quality Management Plan includes measures to help tackle air quality through reducing use of the private car.
New legislation sets out the legal provisions for the introduction of a Contaminated Land regime in Northern Ireland this may have implications for BCC and the LDP when fully enacted.	Noted - however this is generally outside the scope of the LDP at the current stage.
Policy specifically appears to limit the consideration of water quality to inland water and excludes "transitional and coastal waters", particularly in relation to the Water Framework Directive.	It is not the intention of BCC to limit the policy to inland water only. The policy applies to all water environment. <b>See also minor modifications.</b>
Policy should apply to all brownfield sites & have greater material weighting	Policy applies to all development irrespective of site conditions. It seeks to protect the environment and human health. Individual planning proposals will be assessed in accordance with ENV1 and all other planning considerations. This will include consultation with all relevant bodies including NIEA and EH. The policy is considered to have very significant material weighting as part of the dPS.
Policy is unsound as it goes beyond DAERA's guidance on the management of quiet areas. Remove point B- Address local air quality & point C- Protection of the city's designated quiet areas.	The draft policy wording seeks to ensure that any designated quiet areas are not detrimentally affected by new development. It is not intended that new development should result in betterment, rather that the proposals take full account of the quiet area designation.



## Council response to key issues raised

Main Issue	Council Response
Removal of the wording 'positively address' in relation to the protection of the city's designated quiet areas.	It is not intended that new development should result in betterment, rather that the proposals take full account of the quiet area designation. <b>See also minor modifications.</b>

## Council response to key issues raised

### Technical Supplement 16

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Incorrect references to contaminated land & EPA legislation	As the opportunity arises BCC will correct any inaccuracies or required legislative updates to the technical supplement. However whilst this provides a context for the policy at a point in time, any subsequent changes do not render the policy unsound. This matter can be rectified in future SPG. In addition known or suspected contamination will be considered at the LLP stage in the zoning of land and may be included as Key Site Requirements.

## ENV2 – Mitigating environmental change

### Summary of Responses

Five respondents provided comments in relation to **policy ENV2**. Of the comments submitted:

- Two respondents provide comments in support, including the promotion of energy efficient design in buildings;
- One respondent states the importance of reusing existing buildings as opposed to new buildings - it is assumed that this is supportive of the policy;
- Two respondents state that the policy is ineffective in mitigating environmental change and the policy needs to be strengthened, including by amending wording to omit 'where appropriate' etc.;

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Need to strengthen wording to omit 'where feasible or appropriate'.	The wording "where feasible or appropriate" is commonly used in established planning policy and reflects the discretionary nature of planning in practice.
A statement of sustainability should be provided to demonstrate how the proposal has considered sustainable patterns of development and sustainable design.	In regards to the statement of sustainability that may be required, BCC considers that the policy requirement to demonstrate the highest sustainability standards (4th Para of policy) adequately covers this.
Amend wording to include cross referencing to other policy considerations.	The dPS should be read in its entirety and it is not necessary to duplicate specific policy provisions throughout the document.

## Council response to key issues raised

### ENV3 – Adapting to environmental change

#### Summary of Responses

Six respondents provided comments in relation to **policy ENV3**. Of the comments submitted:

- Two respondents provide comments of support of which one respondent supports where developers will be required to take consideration of environmental change and strongly support to promote energy efficiency design in buildings;
- One respondent states that **ENV3 policy** should amend the wording to include all other policy requirements (cross referencing);
- One respondent states that **ENV3 policy** under criteria G & I has excessive requirements and will create a significant cost burden on applicants and is inconsistent with the approach in the SPPS and PPS 15;
- One respondent states that **ENV3 policy** does not identifying areas of the coast known to be at risk from coastal erosion and land instability and setting out policy where new development should not be permitted within such areas as required under the SPPS. Therefore strengthening of the wording is needed;
- It is assumed that one responded refers to **ENV3 Policy** as they encourage sustainable forms of urban and architectural design including sustainable drainage systems, green roofs and others. However more active promotion is needed of sustainable design measures.

#### Responses received

Respondent	
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Respondent	
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-A-Q2-E</a>	LATT Ltd
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Amend wording to include all other policy requirements (cross referencing)	The suggested cross referencing to other policy provisions, the dPS should be read in its entirety and it is not necessary to duplicate specific policy provisions throughout the document.
Excessive requirements under criteria G & I (demonstration of protection measures for extreme weather and flooding)	BCC considers that all proposed development must consider the implications of environmental change on the fabric and occupants of the development. Any supporting evidence will be dependent and proportionate on the nature, scale and location of the

## Council response to key issues raised

Main Issue	Council Response
	development. Further guidance will be provided within future SPGs.
More active promotion needed of sustainable design measures	The LDP includes a number of policies that aim to further sustainable development and quality design and these will be material considerations in assessing future planning applications. The overall approach of the LDP will help to mitigate and adapt to environmental change.
Need to strengthen wording in line with SPPS to include the wording "coastal erosion and land instability".	Whilst this is set out in the SPPS, the wording "coastal erosion and land instability" could be added to the listed matters in the interests of clarity. <b>See minor modifications.</b>
Certain planning exemptions could be offered in return for the inclusion of green roofs, swales and other sustainable urban and architectural design features	Whilst the LDP cannot effect planning exemptions, its implementation and the Developer Contribution Framework can achieve more sustainable design.

## Council response to key issues raised

### ENV4 – Flood risk

#### Summary of Responses

Six respondents provided comments in relation to **policy ENV4**. Of the comments submitted:

- One respondent stated that the approach is accepted and recognised ongoing mitigation strategies across the city;
- One respondent supports the policy and that the precautionary approach taken in PPS 15 is included within the dPS;
- One respondent stated that the policy has an unsound approach relying on SPPS, without local policies for fluvial and coastal flooding;
- One respondent stated that the reservoirs safety policy and **policy ENV4** does not consider the need to evaluate the impact of any proposed development on any area, not just a flood risk area, downstream of the proposed development;
- One respondent has stated that there is no policy or reference to possible inundation from reservoirs;
- One respondent stated that the policy should be in line with PPS15/SPPS. The policy also lacks guidance on exceptions and it is an onerous requirement.

***It is noted that representation has been made regarding Technical Supplement 9 – Flood Risk this guidance is linked to Policy ENV4- Flood Risk. The response has been outlined below.***

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-A-Q2-E</a>	LATT Ltd
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Rivers)

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Water and Drainage Policy Division)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Planning)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Policy should be in line with PPS15/SPPS – it lacks guidance on exceptions and is an onerous requirement on new development	The SPPS has a statutory basis under part 1 of the Planning Act (NI) 2011 and its policy provisions apply to the whole of NI. These policy provisions are material to all decisions on planning applications and appeals. This is confirmed in the 3rd Para in ENV4 policy. BCC considers

## Council response to key issues raised

Main Issue	Council Response
	<p>that the policies in the SPPS and the dPS taken together with future SPGs provides adequate detail and guidance in relation to flood risk and commensurate with current flood policy (PPS15). The SPG will provide guidance on any appropriate exceptions to the policy. As regards the policy provisions being in excess of current requirements, it is not considered that the policy approach is significantly different. Nevertheless, it is considered that the precautionary approach should be applied in all cases, particularly in view of the potential flood risk to Belfast.</p>
<p>Policy is an unsound approach relying on SPPS, without local policies for fluvial and coastal flooding</p>	<p>The SPPS has a statutory basis under part 1 of the Planning Act (NI) 2011 and its policy provisions apply to the whole of NI. These policy provisions are material to all decisions on planning applications and appeals. This is confirmed in the 3rd Para in ENV4 policy. BCC considers that the policies in the SPPS and the dPS taken together with future SPGs to be written in consultation with DfI provide adequate detail and guidance in relation to flood risk and commensurate with current flood policy (PPS15). Therefore BCC considers that the dPS is consistent with the POP as the overall policy approach is retained and BCC is committed to adopting more detailed SPG in tandem with the adoption of the dPS. As regards to coastal flooding BCC acknowledges the significant risks to Belfast and the policy confirms that a precautionary approach will be taken in accordance with any guidance provided by DFI Rivers including through the DM process and at LPP and SPG stages. The overall dPS seeks to ensure environmental resilience, including in relation to climate change and flood risk, and these matters are prominent throughout the dPS policy approach.</p>
<p>No policy or reference to possible inundation from reservoirs</p>	<p>The SPPS has a statutory basis under part 1 of the Planning Act (NI) 2011 and its policy provisions apply to the whole of NI. The SPPS includes specific policy for development in proximity to reservoirs. These policy provisions are material to all decisions on planning applications and appeals. This is confirmed in the 3rd Para in ENV4 policy. BCC considers that the policies in the SPPS and the dPS taken together with future SPGs provides adequate detail and guidance in relation to flood risk and commensurate with current flood policy (PPS15). Furthermore BCC acknowledges the risk of flooding</p>

## Council response to key issues raised

Main Issue	Council Response
	associated with reservoirs and the policy confirms that a precautionary approach will be taken in accordance with any guidance provided by DFI Rivers including through the DM process and at LPP and SPG stages.
No policy on reservoirs, flood defences and artificial watercourses	The SPPS has a statutory basis under part 1 of the Planning Act (NI) 2011 and its policy provisions apply to the whole of NI. The SPPS includes specific policy for development in proximity to reservoirs, protection of flood defence, drainage infrastructure and artificial modification of watercourses. These policy provisions are material to all decisions on planning applications and appeals. This is confirmed in the 3rd Para in ENV4 policy. BCC considers that the policies in the SPPS and the dPS taken together with future SPGs provides adequate detail and guidance in relation to flood risk and commensurate with current flood policy (PPS15). Furthermore BCC acknowledges the risk of flooding in Belfast and the policy confirms that a precautionary approach will be taken in accordance with any guidance provided by DFI Rivers including through the DM process and at LPP and SPG stages.



## Technical supplement 9

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Some minor revisions required to referencing and detailed information on reservoirs	Comments noted. If the opportunity arises BCC will correct any inaccuracies or required legislative updates to the technical supplement. However whilst this provides a context for the policy at a point in time any subsequent changes do not render the policy unsound, This matter can be addressed in future SPG which will be prepared in association with DFI.

**ENV5 – Sustainable drainage systems (SuDS)**

**Summary of Responses**

Six respondents provided comments in relation to **policy ENV5**. Of the comments submitted:

- One respondent encourages the use of sustainable urban drainage systems and notes the importance of drainage assessments;
- One respondent, while they welcome reference to climate change, would like the council to issue a statutory requirement to incorporate and manage SuDS as part of new developments;
- Two respondents deem the draft policy to be unsound and state that it should be in line with SPPS and strengthened with the removal of wording ‘where appropriate’;
- One respondent, while they welcome the approach, is seeking clarity on the delivery of SuDs;
- One respondent, whilst welcoming the policy, states it is unclear how some aspects of the policy will work in practice.

**Responses received**

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-A-QV-J</a>	Northern Ireland Water
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure - Water and Drainage Policy Division
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

**Main Issue(s) raised by respondent(s) and Belfast City Council’s response**

Main Issue	Council Response
Clarity required on application of policy and the practical delivery of SuDS.	All development should include SuDS measures and this will be achieved through the DM process. Each case is considered on planning merit and the SuDS measures will be appropriate to the nature, scale and location of the proposal. Future SPG will provide further guidance on the incorporation of SuDS measures in proposed development.
Terminology query on “two stage SuDS process”.	The two stage SuDS process generally relates to enhanced water quality through a filtration process. Additional detail can be provided in future SPG as required.

Main Issue	Council Response
Further clarification around maintenance agreements	BCC will consult with NI Water both in relation to the proposed SuDs measures and the management arrangements as part of the DM process including in consultation with NI Water. BCC will expect applicants to set out their proposals in this regard and BCC reserves the right to refuse permission for proposals that do not meet its planning policy requirements.
Presumption that the majority of development within Belfast will be brownfield and, therefore, SuDS measures will be on-site?	Whilst the LDP includes a focus on brownfield redevelopment each case is considered on planning merit and the SuDS measures will be appropriate to the nature, scale and location of the proposal. SuDS measures may be appropriate off-site as well as on-site in some situations and these will be considered on merit.
Further clarification for applicant/developer to demonstrate consideration of SuDS measures - Should there also be a general line in this to state that all forms attenuation should be considered, not just soft SuDS?	<p>In regards to the onus on the applicant/developer to demonstrate consideration of SuDS measures, the intention of the policy is to require SuDS measures in all new development, commensurate with the nature, scale and location of proposal.</p> <p>Whilst it is accepted that hard engineered attenuation systems are appropriate in certain circumstances such measures do not provide the multiple benefits associated with soft SuDS, which the plan is promoting to further sustainable development.</p>
The policy should include reference to the Water and Sewerage Services Act (Northern Ireland) 2016	It is not the role of the LDP to cross reference legislative responsibilities of statutory undertakers and their operational requirements. The referenced legislation is separate from planning legislation and is not affected by the LDP.
Should the 'Public Sector Intervention' box be ticked if councils/ public authorities are potentially going to adopt and maintain soft SuDS under certain circumstances?	The public sector intervention box is intended to identify possible situations where significant intervention is required such as public/private partnerships, masterplans/development briefs and irrespective of its inclusion it doesn't affect the soundness of the plan. This is explained in para 11.1.4 of the DPS.
Wording in policy need to be strengthened and in line with SPPS, omitting 'where appropriate'.	The wording "where appropriate" is commonly used in established planning policy and reflects the discretionary nature of planning in practice.

## Council response to key issues raised

### Policy GB1 – Green and blue infrastructure network

#### Summary of Responses

Six respondents provided comments in relation to **policy GB1**. Of the comments submitted:

- One respondent supports the policy, while making reference to certain geographical areas/projects and their success;
- One respondent supports the policy but would like to see agreement between councils on the maintenance and protection of these areas;
- One respondent states that they welcome the policy and support the intention to develop a green and blue infrastructure;
- One respondent agrees with the policy approach to protect and provide open space including a network of green and blue infrastructure and further states that the Council should work with adjacent councils to ensure that, where opportunities exist, greenway linkages across council boundaries are facilitated;
- One respondent, while welcoming the plans inclusion of a range of policies that seek to link up existing blue and green infrastructure and promote open space standards for new developments, states that more could be done to promote equal access and by adopting more specific standards for access to open space;
- One respondent urges the council to produce an ambitious green and blue infrastructure plan, with sufficient resourcing and investment to effectively deliver the Plan.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-A-62-K</a>	Belfast Healthy Cities
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The policy should be much more specific with requirements and standards for green infrastructure features in new developments.	The dPS provides standards for open space and also sets out expectations for green infrastructure in all new development. Additional guidance is also provided in the council's draft GBIP and DCF. Future SPG and KSRs at LPP stage will also help to clarify the requirements for new green infrastructure and improved access.

## Council response to key issues raised

Main Issue	Council Response
G&B connectivity important - encourage ambitious G&B Infrastructure Plan & sufficient resourcing to deliver it	The council's GBIP will help inform future development and investment decisions including public sector projects. In addition the council's DCF sets out expectations for physical works or financial contributions in tandem with new development. Furthermore the dPS includes <b>policies ENV2, 3 and 5</b> that promote greening initiatives through development.
Community greenways and landscape wedges cross or adjoin local government boundaries – therefore agreement needed between councils on the protection and maintenance of these areas.	BCC will continue to work with a range of stakeholders, including adjoining councils, on matters relating to the development and future maintenance of community greenways and landscape wedges. In addition, the Metropolitan Working Group and further engagement on the GBIP will facilitate continued co-operation with adjoining councils.

## Supportive- Site related

Comments	Council Response
One respondent was supportive of the policy and referred to site specific site adjacent to the Connswater Community Greenway.	Welcome support. BCC notes that this submission relates to a specific site and the future zoning of this site will be considered at the LPP stage.

### Policy OS1 – Protection of open space

#### Summary of Responses

Ten respondents provided comments in relation to **Policy OS1**. Of the comments submitted:

- One respondent makes general comments of support to **policies OS1-6** overall. However in relation to **OS1** the respondent would like to see the retention of a joint protocol (formerly with DoE) for the operation of the exception policy in PPS 8 to provide guidance for all stakeholders on the approach to be taken when considering the redevelopment of open space for wider community benefits;
- One respondent states that the wording of **OS1** is not as strong as protection afforded within the SPPS;
- Four respondents state that there is insufficient evidence to support the policy and that robust and up to date evidence/audit is needed;
- One respondent states that the policy requirement for open space is unclear for non-residential development and that there is no evidence for any requirement for ancillary equipment;
- One respondent states that the policy is unsound and a full review is needed of existing **OS** areas and states that policy flexibility is needed to allow development;
- One respondent states that the policy is too restrictive and not flexible enough - states a lack of evidence for designation of open space;
- One respondent states that the policy needs further clarification regarding bonfires and open space.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Planning)
<a href="#">DPS-A-QQ-D</a>	Belfast Royal Academy
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-81-M</a>	Adam Armstrong
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-A-11-D</a>	Individual
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations (NIFHA)
<a href="#">DPS-B-AX-4</a>	Lagan Homes

## Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>There is insufficient evidence within the technical supplement to support the policy proposed. A robust, up to date evidence basis should be prepared to support this policy.</p>	<p>The policy is fully compliant with the SPPS policy presumption against loss of open space to competing land uses irrespective of its physical condition, unless demonstrated that redevelopment would bring substantial community benefit that outweighs loss of open space. BCC has undertaken an audit of significant open spaces across the city including consideration of its function and quantity irrespective of ownership. The Belfast Open Spaces Strategy (BOSS) has been published in draft form for consultation purposes and once finalised this will help inform the LPP stage in zoning open space lands and will inform planning application decision-making. This accords with the SPPS requirements.</p>
<p>Policy is not sound and is not realistic or appropriate in its current wording. A full review and qualitative assessment of existing open space areas and rewording to allow flexibility to permit development where open space has no amenity value.</p>	<p>The policy is fully compliant with the SPPS policy presumption against loss of open space to competing land uses irrespective of its physical condition, unless demonstrated that redevelopment would bring substantial community benefit that outweighs loss of open space. BCC has undertaken an audit of significant open spaces across the city including consideration of function and quantity irrespective of ownership. The Belfast Open Spaces Strategy (BOSS) has been published in draft form for consultation purposes and once finalised this will inform the LPP stage and planning application decision making. This accords with the SPPS requirements. The policy is flexible and allows consideration of loss of open space in certain circumstances.</p>
<p>The policy needs further clarification regarding bonfires on open space areas.</p>	<p>The unauthorised use of any land including open space for bonfires is outside the scope of the LDP. Nevertheless the policy provides flexibility to allow alternative uses of open space in certain circumstances, including where wider community benefits can be derived.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>The wording in the policy is not as strong as SPPS, which states that a regional strategic objective is to 'safeguard existing open space'. This objective is not clearly articulated within the policy which supports retention and improvement of existing open space.</p>	<p>BCC considers the draft policy offers strong protection of open space in accordance with the SPPS. The suggested alternative wording does not provide any additional protection.</p>
<p>Would like to see the retention of a joint protocol (formerly with DoE) for the operation of the exception policy in PPS 8 to provide guidance for all stakeholders on the approach to be taken when implementing an exception to this policy.</p>	<p>The former joint protocol is noted. Although this is outside the scope of the LDP, BCC would be happy to engage with NIHE in relation to the protocol referenced.</p>

## Site related

Comments	Council Response
<p>Three respondents make comments referring to specific sites –(1) open space adjacent to the Connswater Greenway; (2) school grounds at Ben Madigan; and (3) existing school playing fields near Malone Road.</p>	<p>BCC notes that these submissions relate to specific sites and the future zoning of these lands will be considered at the LPP stage.</p>



## Policy OS2 – New open space within settlements

### Summary of Responses

Two respondents provided comments in relation to Policy OS2. Of the comments submitted:

- One respondent makes general comments of support to policies OS1-6 overall. However in relation to OS2 the respondent states there is a lack of green and open space within the city centre and there is an opportunity to provide new open space within the centre;
- One respondent makes a general comment which is assumed to refer to Policy OS2 as it mentions broad needs identified in draft Facilities Strategy and Local Area Reports.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-8K-E</a>	DFC Permanent Secretary

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The policy should reflect broad needs identified in draft Facilities Strategy & Local Area Reports.	Any spatial implications of the DfC Facilities Strategy and Local Area Reports will help to inform the LPP stage through continued stakeholder engagement.
There is a lack of green and open space within the city centre, and there is an opportunity to provide new open space within the centre.	The policy is intended to deliver new or improved open space or improved access to open space as a result of new development, including in the city centre area. In addition, the provision of new open space in the city centre will be considered at LPP stage through possible land use zoning and key site requirements.

## Council response to key issues raised

### Policy OS3 – Ancillary open space

#### Summary of Responses

Ten respondents provided comments in relation to [Policy OS3](#). Of the comments submitted:

- One respondent makes general comments of support to policies [OS1-6](#) overall. However in relation to [OS3](#) the respondent states there is a lack of green and open space within the city centre and there is an opportunity to provide new open space within the centre;
- Two respondents have stated that there is insufficient evidence to support the policy.
- Three respondents have stated that there is insufficient evidence and that the definition of ancillary equipment is unclear;
- Two respondents stated that the policy requirement is unclear for non-residential development and that there is no evidence base for the ancillary equipment requirement;
- One respondent is seeking clarity on future management arrangements and how this might impact on decision-making;
- One respondent stated that there is insufficient evidence to support the policy and that its implementation is unclear.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Water and Drainage Policy Division)
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus

Reference	Respondent
	Healthcare Development (HK) Ltd
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations (NIFHA)
<a href="#">DPS-B-AX-4</a>	Lagan Homes

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Insufficient evidence to support policy and implementation unclear	The policy complies with the SPPS requirements for new residential development. The policy also requires open space to serve the needs of non-residential development such as industrial and commercial as it is important that all occupiers have safe and convenient access to appropriate open space areas in interest of

Main Issue	Council Response
	health and wellbeing and environmental quality and resilience. The nature of these areas will vary on the scale, type and location of the development.
Clarity on future management arrangements and impacts on decision-making	Appropriate management arrangements should be in place for communal open space and each case shall be assessed on their particular circumstances. Options might include conditions or legal agreements and these will be enforced through the development management process. The BCC developer's contributions framework and future SPG will provide further guidance on these matters.
No evidence for ancillary equipment requirement and unclear for non-residential development	As regards ancillary equipment in any open space, this will be dependent on the nature, number and type of occupiers of the development. Future SPG and key site requirements will help to provide guidance on the type of ancillary equipment that might be appropriate.
There is a lack of green and open space within the city centre and there is an opportunity to provide new open space within the Centre.	The policy is intended to deliver new or improved open space or improved access to open space as a result of new development, including in the city centre area. In addition, the provision of new open space in the city centre will be considered at LPP stage through possible land use zoning and key site requirements.

## Council response to key issues raised

### Policy OS4 – New open space outside settlements

#### Summary of Responses

Three respondents provided comments in relation to **Policy OS4**. Of the comments submitted:

- One respondent makes general comments of support to policies **OS1-6** overall;
- One respondent states that policy **OS4** has different wording emphasis from SPPS;
- One respondent states that whilst policy **OS4** is welcomed it does not accord with policy **OS5** wording.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Planning)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
OS4 policy needs to accord more closely with OS5 wording for sports stadia in particular.	It is not intended that the policy approach in both OS4 and OS5 is different in relation to sports stadia. <b>See also minor modifications in relation to OS5.</b>
The policy has different wording emphasis from SPPS in relation to 'appropriate activities' and 'appropriate locations'.	It is not intended that the policy approach should infer a change in emphasis from the SPPS. <b>See also minor modifications.</b>

## Policy OS5– Intensive sports facilities

### Summary of Responses

Four respondents provided comments in relation to **Policy OS5**. Of the comments submitted:

- One respondent makes general comments of support to **policies OS1-6** overall;
- One respondent makes a general comment which is assumed to refer to **Policy OS5** as it mentions meeting broad needs identified in draft Facilities Strategy and Local Area Reports.
- One respondent states that **policy OS5** departs from the SPPS in regards to potentially permitting intensive sport facilities (as well as stadia) outside settlement limits;
- One respondent states that whilst **policy OS4** is welcomed it does not accord with policy **OS5** wording.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Dfl - Planning
<a href="#">DPS-B-8K-E</a>	DFC Permanent Secretary

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>OS5</b> policy needs to accord more closely with <b>OS4</b> wording in relation to proposals outside settlement limits, with preference given to previously development land.	It is not intended that the policy approach in <b>OS5</b> is different from <b>OS4</b> in relation to intensive sports facilities outside settlement limits. <b>See also minor modifications in relation to OS4.</b>
<b>OS5</b> policy needs to accord more closely with SPPS wording for sports stadia outside settlement limits in particular.	It is not intended that the policy approach in <b>OS5</b> is different in relation to sports stadia. <b>See also minor modifications.</b>

## Council response to key issues raised

### Policy OS6 – Facilities ancillary to water sports

#### Summary of Responses

One respondent makes general comments of support to **policies OS1-6** overall.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

#### No issues raised by respondent

### Policy OS7 – Floodlighting

#### Summary of Responses

No representations have been made in respect of **policy OS7**.

## Policy NH1 – Protection of natural heritage resources

### Summary of Responses

Seven respondents provided comments in relation to **Policy NH1**. Of the comments submitted:

- One respondent welcomes the support for the protection of natural heritage resources to protect our environment, biodiversity and wildlife and acknowledge benefits for environment and improve peoples' health and wellbeing;
- One respondent supports that developers ensure all new development incorporates extensive greening measures and supports the reference made to 'net gain';
- One respondent suggests amending the policy provisions to exclude the requirement for a development setback of 5m from watercourses within port areas such as wharfs and quays;
- One respondent, whilst welcoming the council's adoption of the precautionary approach, states that the policy is at odds with the SPPS and is ambiguous and requires rewording;
- One respondent states that the policy lacks detail and is weak as it does not pay due regard to the hierarchy of habitats and species protected under international, national and local legislation;
- One respondent states concern over absence of Areas of Constraint on Mineral Development (ACMD) and that the policy does not clearly provide a hierarchy of protection;
- One respondent states that the policy does not comply with SPPS and requires rewording.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Planning)
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency

In addition, it has been assumed that some of the Belfast Hills Partnership comments relate to Policy NH1. However, these comments are general in nature and do not raise any significant issues to be addressed by BCC.

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The policy is weak and does not comply with SPPS or PPS2, including in terms of hierarchy of designations, and requires rewording.	Issue noted however BCC does not accept this. BCC has attempted to consolidate all natural heritage policy tests in a single and simplified policy to avoid undue repetition of the SPPS whilst adequately reflecting the hierarchy of natural heritage interests and their associated planning tests.
The policy does not comply with SPPS and requires rewording.	Issue noted however BCC does not accept this. BCC has attempted to consolidate all natural heritage policy tests in a single and simplified policy to avoid undue repetition of the SPPS whilst adequately reflecting the hierarchy of natural heritage interests and their associated planning tests
The policy needs to be amended to exclude setback of 5m within port areas.	Issued noted however BCC does not accept this. The policy allows a degree of flexibility in its terminology and it is accepted that there may be instances where a lesser setback is appropriate subject to consultation with NIEA. However the precautionary principle will be applied in all cases to protect natural heritage.
Areas of Constraint on Mineral Development (ACMD) not included.	BCC does not accept that Areas of Constraint on Mineral Development (ACMD) are required in the BCC area, as there are adequate policy provisions throughout the dPS (including <b>M1, LC1-4 and NH1</b> ) that provide protection against inappropriate mineral development. See also our response to <b>Policy M1</b> .



## TRE1 – Trees

### Summary of Responses

Ten respondents provided comments in relation to **Policy TRE1**. Of the comments submitted:

- One respondent supports this policy to protect existing trees and to increase the number of trees in Belfast in particular the promotion of native trees to support wildlife and biodiversity;
- One respondent supports the policy and is important to maintain the city's trees and prevent the loss of hedges and gardens to development;
- One respondent endorses the approach and wishes to highlight its support for the draft policy;
- Six respondents state that the policy should be withdrawn or removed as there is no evidence basis to support it and the proposed policy approach duplicates current planning TPO provisions;
- One respondent wishes to strengthen the policy by the inclusion of the wording 'wholly exceptional' and the additional inclusion of a 50-metre buffer zone around ancient and long-established woodlands;
- It is assumed one respondent was referring to **Policy TRE1** (as well as **DES1&2**) when they state the policy should enable the removal of trees that do not have a Tree Preservation Order as, otherwise, it will hinder the development of sites (\*see note below).

### Responses received

Reference	Respondent
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academicals Institute (RBAI)
<a href="#">DPS-A-1F-2</a>	Construction Employers Federation
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-92-P</a>	Historic Buildings Council
<a href="#">DPS-B-AA-D</a>	Northern Ireland Federation of Housing Associations (NIFHA)
<a href="#">DPS-B-9U-S</a>	Woodland Trust
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Strengthen to add wording 'wholly exceptional' & include 50m buffer zone around	BCC considers the draft policy provides strong protection in its wording and does not agree that the suggested wording will provide any additional further

## Council response to key issues raised

Main Issue	Council Response
ancient/long-established trees/woodlands.	protection. The policy also adopts a precautionary approach and includes a general presumption in favour of retaining and safeguarding trees. As regards to the suggested 50m buffer zone, BCC considers that the policy, taken in tandem with published guidance and future SPG, will ensure clarity across a range of particular local circumstances.
No evidence to support policy, which also duplicates existing TPO provisions.	The policy seeks to protect trees from new development, which is in accordance with the SPPS. There is significant evidence that supports the important role that trees play across a range of benefits including health and wellbeing, climate resilience and biodiversity. Furthermore, public bodies have a statutory duty to further conservation of biodiversity. Therefore, trees should be protected and incorporated into new development, rather than being felled. As regards current TPO provisions, these do not protect all trees in the district, but only those that are the subject of a statutory TPO. Therefore, the use of TPO provisions alone is not feasible to secure the policy objectives.

\*It is noted that Construction Employers Federation refers to DES1 & DES2, to which policy TRE1 is also relevant. Below is the BCC response on DES1 & DES2 on this matter.

Main Issue	Council Response
The policy should be adapted to enable the removal of trees that do not have a Tree Preservation Order. The current wording will greatly hinder the development of sites.	The policy criteria has been included to protect the character and appearance of areas within the city that benefit from existing tree coverage. A primary function of the planning system is the protection and integration of key environmental assets. It is acknowledged that there will be cases when trees will be required to be removed to accommodate development, where this is the case appropriate replanting and landscaping will be considered. Supported by <b>TRE1</b> .

## LC1 – Landscape

### Summary of Responses

*Please note that LCA1- Areas of outstanding Natural Beauty, LC1B - Areas of High Scenic Value, LC1C – Local Landscape Policy Area and LC1D – Landscape wedges all fall under Policy LC1 Landscape.*

Eight respondents provided comments in relation to **policy LC1**. Of the comments submitted:

- One respondent supports the approach that the Belfast Harbour landscape is identified as a seascape character area within the NIEA Regional Seascape Character Assessment of NI (2014);
- One respondent endorses the policy and believes it is important these landscapes are protected from inappropriate development;
- One respondent makes general comments regarding **policy LC1** and states that the Council requires adequate expertise to assess landscape & additional planning controls;
- One respondent requires the removal of **criteria B, D & E in LC1D policy** as it is too restrictive in terms of the types of developments that would be permitted within a rural landscape wedge;
- One respondent recommends that the word 'normally' is removed to make the policy robust in **LC1D** and that some J&A text be included within the main body policy wording of **Policy LC1A**;
- One respondent states that the precautionary approach is not brought forward into the landscape policy not produced Landscape Character Assessments and further clarity on this point would assist practical implementation;
- Two respondents state that there is no up to date Landscape Character Assessment.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-UD-4</a>	Braidwater Homes
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency

## Council response to key issues raised

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
BCC needs to have adequate expertise to assess landscape impact.	The assessment of proposals will be taken through the DM process. Any landscape aspects will also be considered, including through liaison with NIEA and other relevant agencies.
<b>Policy LC1D</b> - The landscape wedges criteria too restrictive- suggest removal of points B, D & E.	BCC does not agree with the issue. Landscape wedges perform an important role in maintaining visual and physical separation between build-up areas and also provide biodiversity and leisure benefits. Therefore any built development should be strongly restricted to meet only ancillary needs of leisure uses.
Additional planning controls should protect areas of regional and international environmental significance such as AONBs and also local landscape designations.	BCC agrees important landscapes should be designated and protected with special planning controls. The policy approach secures this protection. The local landscape designations will be reviewed as part of the LPP stage.
Regarding Policy LC1D, the word 'normally' should be removed to make policy robust.	The word "normally" is commonly used in established planning policy and reflects the discretionary nature of planning in practice.
<b>LC1A</b> - add SPPS wording from J&A into policy box	It is not necessary to duplicate the SPPS policies in the DPS.
Omission of precautionary approach & <b>LC1A, B &amp; C</b> - needs further clarity on criteria as may conflict with <b>LC1</b> .	See minor modifications.
No up to date Landscape Character Assessment.	BCC review of development pressure analysis indicates that there have been only minor changes around the city and these do not undermine the existing landscape character assessments, which are considered to remain relevant to the dPS stage. However, all local landscape designations will be reviewed as part of the LPP stage and this will require further analysis work.

## Site related

Comments	Council Response
One respondent makes comments referring to a specific site – (1) Barnfield Road (within Rural Landscape Wedge LN 02).	BCC notes that this submission relates to a site specific comment and relates to proposed urban development. The local landscape designations will be reviewed as part of the LPP stage.

## Council response to key issues raised

### Policy LC2 – Lagan valley regional park (LVRP)

#### Summary of Responses

Two respondents provided comments in relation to **Policy LC2**. Of the comments submitted:

- Two respondents were in general support in protection of landscape quality and features as it is important to protect such landscapes as the Lagan Valley Regional Park.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

**No issues raised by respondents.**

## Policy LC3 – Belfast Hills

### Summary of Responses

Five respondents provided comments in relation to **Policy LC3**. Of the comments submitted:

- Two respondents support this policy, with one noting that it strikes balance between protecting and enhancing the natural environment and areas of high scenic value;
- One respondent states that the BMAP development limit should be retained as it is particularly sound;
- One respondent suggests National/Regional Park status for Belfast Hills;
- One respondent states any land that does not provide access to the Belfast Hills should not be designated as part of the Belfast Hills area (also site specific submission).

### Responses received

Reference	Respondent
<a href="#">DPS-B-UX-R</a>	Belfast Hills Partnership
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-A-QQ-D</a>	Belfast Royal Academy

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Zoning issue - retain BMAP development Limit as it is particularly sound.	Zonings and designations these will considered and reviewed at the LPP stage. The LDP is being prepared in consultation with adjoining authorities and any cross boundary issues affecting the Belfast Hills area will also be considered at LPP stage.
Policy should not apply to Belfast Hills areas that have no public access – also refers to specific site where accuracy of online interim mapping is queried.	BCC does not agree with the respondent on the principle of the policy. The policy aims to protect the landscaping heritage of the hills irrespective of the availability of public access. The dPS does not include details of zonings and designations as these will be considered and reviewed at LPP stage. However, as regards the specific site mentioned in the submission, it should be noted that the map viewer shows the Belfast Hills Partnership area for information purposes only at this stage of the LDP process. Any inaccuracy in the

## Council response to key issues raised

Main Issue	Council Response
	detailed boundary of the designation will be amended at LPP stage.
Are there clear mechanisms for monitoring?	Monitoring of the policy effectiveness will be achieved through the normal monitoring of planning decisions in the Belfast Hills designated area.

## General Comment made by respondent

Comments	Council Response
Suggest National/Regional Park status for Hills.	The LDP does not have the statutory power to grant national/ regional park status for the Belfast Hills.
Concern regarding the decision making process at committee.	The decision making process at committee is outside the scope of the LDP. Nevertheless decisions are made having regard to the LDP and SPPS.



## Policy LC4 – Coastal area

### Summary of Responses

Six respondents provided comments in relation to **Policy LC4**. Of the comments submitted:

- One respondent endorses the policy and believes it is important that these landscapes are protected from inappropriate development;
- One respondent, while supporting the policy, suggests reference should be made to the implementation of shoreline management plans at the Local Policies Plan stage.
- One respondent states that the policy will need to be clarified by additional text on mitigation and compensation measures as set out in SPPS and legislation;
- One respondent suggests additional reference to any future national coastal policy is required;
- One respondent suggests amendments to the policy in relation to the lack of distinction between developed and undeveloped coast and no designation of urban waterfronts;
- One respondent states that the wording should refer to UK Marine Policy Statement and any appropriate marine plan(s).

### Responses received

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (Water and Drainage Policy Division)
<a href="#">DPS-B-8Z-W</a>	RSPB NI
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure- (Planning)
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Whilst the coastal policy is robust, reference should be made to the implementation of shoreline management plans at the Local Policies Plan Stage	BCC welcomes comment that the policy is robust. Reference to the implementation of shoreline management plans will be included in the LPP stage where relevant.
Wording to align with SPPS and legislation in relation to "unacceptable effect" on designations etc	BCC considers that, when read alongside the SPPS, the draft policy adequately secures the protection of the coastal area, including undeveloped areas (outside settlement

## Council response to key issues raised

Main Issue	Council Response
	boundary) and any relevant natural heritage interests.
Reference needed to emerging coastal management approach	It is not considered necessary to refer to emerging policy approaches in the DPS.
Policy weak - no distinction between developed/undeveloped coast and no urban waterfronts	The policy applies to the undeveloped coast as defined in the interim in draft BMAP. The detailed boundary of the coastal area and the settlement limit will be considered at LPP stage. In regards to urban waterfronts, it is not the current intention to designate such areas within the BCC area.
Wording should refer to UK Marine Policy Statement and any appropriate marine plan(s)	BCC considers that the SPPS adequately covers this policy issue and this is also referenced in the J&A of LC4. The plan should be read in conjunction with the SPPS and any Marine Policy Statement as all such plans form part of the overall hierarchy of planning policy documents.

## Policy DC1 – All countryside development - general policy principles

### Summary of Responses

**Five** respondents provided comments in relation to **policy DC1**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent objects to the policy due to the lack of clarity on justification of locational or site-specific need – states this will lead to substantial uncertainty in the decision making process;
- One respondent states that the detailed wording in the policy is not in line with the SPPS in relation to clustering;
- One respondent, whilst they do not directly reference **DC1**, states the importance of referencing the 'cultural heritage' in the introduction to countryside policies.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-9Q-N</a>	Colin McAuley Planning

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-B-UQ-H</a>	Department for Communities (Historic Environment Division)

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Lack of information clarifying what would constitute an acceptable 'Justification of rural locational need or site-specific need'.	The justification and amplification (J&A) provides additional clarification on the implementation of this policy. It is incumbent on the applicant to demonstrate the need for the proposed development in the countryside. The policy approach for the countryside takes account of the sensitive nature of the rural area surrounding Belfast and aims to facilitate only development that is required to serve rural needs in the interests of sustainable development.
Wording "Cultural' heritage' to be included intro paragraph 10.5.1.	The suggested reference to cultural heritage has no impact on the policy wording and therefore is not necessary.

## Council response to key issues raised

Main Issue	Council Response
Policy not in line with SPPS in relation to clustering of development as it allows exemptions by stating “where possible and appropriate”. (6.69)	The wording of the policy is not intended to diverge from the SPPS policy approach. <b>See also minor modifications.</b>

## Policy DC2 – Housing in the countryside

### Summary of Responses

**Three** respondents provided comments in relation to **policy DC2**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent states that **policy DC2** is unsound as all surrounding councils need to be in agreement to significantly reduce the future number of dwellings being built in their areas and improve facilities, employment etc. within their towns for the current numbers.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-A-QP-C</a>	Individual

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Belfast and the surrounding council areas need to agree issues of housing and infrastructure/transport together.	BCC and the adjoining councils are each preparing LDPs which must comply with the SPPS. In addition DfI is preparing infrastructure and transport plans for the region. These processes include working and consultation arrangements to discuss common and cross boundary issues.

## Council response to key issues raised

### Policy DC3 – Replacement dwellings

#### Summary of Responses

**Four** respondents provided comments in relation to **policy DC3**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent stated that the **policy DC3** is unsound and that the policy needs to include reference to the historic environment;
- One respondent stated that the **policy DC3** is unsound and that the justification of locational need is an extra test that is not applicable to replacement dwellings.

#### Responses received

Respondent	
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Respondent	
<a href="#">DPS-B-9Q-N</a>	Colin McAuley Planning
<a href="#">DPS-B-UQ-H</a>	Department for Communities (Historic Environment Division)

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The justification of locational need is an extra test that is not applicable to replacement dwellings.	The policy approach for the countryside takes account of the sensitive nature of the rural area surrounding Belfast and aims to facilitate only development that is required to serve rural needs in the interests of sustainable development. The policy seeks to facilitate redevelopment of existing housing stock to meet modern needs for current occupants or enhance the environmental quality. However if the housing use has ceased or has been abandoned any new dwelling would represent additional rural housing stock which would conflict with sustainable development.
The justification and amplification should include historic environment wording	The suggested reference to historic environment has no impact on the policy wording and is not necessary.

## Policy DC4 – The conversion and reuse of existing buildings

### Summary of Responses

**Three** respondents provided comments in relation to **policy DC4**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent stated that the **policy DC4** is unsound and revised wording is needed to be in line with the RDS and SPPS.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-UQ-H</a>	Department for Communities (Historic Environment Division)

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Revised wording in justification and amplification (J&A) to be in line with RDS and SPPS - "rural amenity and character" is too limiting and should be amended to "distinctive character and setting".	The existing wording is considered adequate and in line with the SPPS and RDS approaches. The suggested wording has no impact on the policy and is not necessary.

## Council response to key issues raised

### Policy DC5 – New dwellings: personal and domestic circumstances

#### Summary of Responses

Two respondents provided comments in relation to **policy DC5**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

#### No issues raised by respondent(s)



## Policy DC6 – Dwellings for non-agricultural business enterprises

### Summary of Responses

Two respondents provided comments in relation to **policy DC6**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits.

### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

### No issues raised by respondent(s)

## Council response to key issues raised

### Policy DC7 – Ribbon development

#### Summary of Responses

Three respondents provided comments in relation to [policy DC7](#). Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent stated that the policy is unsound and a clear departure from existing SPPS and PPS 21 policy should allow two infill dwellings.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-9Q-N</a>	Colin McAuley Planning

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The proposed policy is a departure from infill policy in the SPPS and PPS21 Policy CTY 8 from two dwellings to one.	The policy approach for the countryside takes account of the sensitive nature of the rural area surrounding Belfast and aims to facilitate only development that is required to serve rural needs in the interests of sustainable development. The policy seeks to facilitate small scale infill development to meet local rural needs that does not conflict with sustainable development and this is in compliance with the SPPS.

## Policy DC8 – New dwellings in existing clusters

### Summary of Responses

Two respondents provided comments in relation to **policy DC8**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;

### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

### No issues raised by respondent(s)

## Council response to key issues raised

### Policy DC9 – Residential caravans and mobile homes

#### Summary of Responses

Two respondents provided comments in relation to **policy DC9**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;

#### Responses received

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

#### No issues raised by respondents

## Policy DC10 – New dwellings on farms

### Summary of Responses

**Four** respondents provided comments in relation to **policy DC10**. Of the comments submitted:

- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent states that **policy DC10** is unsound and lacks clarity in what is meant by the terms 'exceptional circumstances' or 'clear operational need' and that these must be consistent with SPPS, which provides clear direction with no exceptions.
- One respondent states that **policy DC10** is unsound and that the requirement for 'demonstrable locational need' should be removed from this policy;
- It is assumed that one respondent is referring to **policy DC10** and stated that the policy is unsound in that the provision for a dwelling every ten years is excessive.

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)
<a href="#">DPS-B-9Q-N</a>	Colin McAuley Planning
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

Reference	Respondent
<a href="#">DPS-B-U1-H</a>	Northern Ireland Environment Link

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<b>DC10</b> adds locational need as well as active farm business - lack of clarity on term and should be removed	The policy approach for the countryside takes account of the sensitive nature of the rural area surrounding Belfast and aims to facilitate only development that is required to serve rural needs in the interests of sustainable development. The policy seeks to facilitate a dwelling on an active and established farm in accordance with the SPPS and sustainable development.
The provision for a dwelling every ten years is excessive. The requirement for dwellings on farms should be a needs basis with strict occupancy condition	The 10 year policy provision is in line with requirements of the SPPS.

## Council response to key issues raised

Main Issue	Council Response
Should be no exceptions to 10-year rule to be consistent with SPPS	It is not intended that the policy diverges from the SPPS approach. See also minor modifications.

## Policy DC11 – Agriculture

### Summary of Responses

Three respondents provided comments in relation to **policy DC11**. Of the comments submitted:

- One respondent makes supporting comments, but also stresses the importance of taking account of wider landscape character;
- One respondent states that **policy DC11** is unsound and that the policy needs stronger criteria to reflect the environmental considerations highlighted in the J & A (paragraph 10.5.23). Additionally, the 6 years stipulation within the SPPS has been omitted from this policy;
- One respondent states that **policy DC11** is unsound in that the omission of reference to adverse impact on natural and built heritage.

### Responses received

Respondent	
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Respondent	
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The policy needs stronger criteria & 6 years rule in SPPS has been omitted	The LDP includes other policies that relate to environmental considerations and these apply to all development accordingly. In this regard, the dPS should be read in its entirety and it is not necessary to duplicate specific policy considerations throughout the document. <b>See also minor modifications.</b>
Omission of reference to adverse impact on natural and built heritage – additional comments on permitted development rights.	The LDP includes other policies that relate to the impact on environmental quality and natural and built heritage. In this regard, the dPS should be read in its entirety and it is not necessary to duplicate specific policy considerations throughout the document. The additional reference to Permitted Development (PD) rights is noted - however this generally relates to the development management process and is not within the scope of the LDP.

## Council response to key issues raised

### Policy DC12 – Farm diversification

#### Summary of Responses

**Two** respondents provided comments in relation to **policy DC12**. Of the comments submitted:

- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;
- One respondent stated that **policy DC12** is unsound as the SPPS stipulates that a business must be active for a minimum of 6 years, this has been omitted from the policy.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

Reference	Respondent
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
The 6 year rule in SPPS has been omitted from the policy	It is not intended to diverge from the SPPS approach on the 6-year rule. <b>See also minor modifications.</b>



## Policy DC13 – Other proposed development in the countryside

### Summary of Responses

**One** respondent provided comments in relation to **policy DC13**. Of the comments submitted:

- One respondent supports the policy and also states that they do not generally support housing developments in the open countryside and would prefer this within the settlements limits;

### Responses received

Reference	Respondent
<a href="#">DPS-B-8J-D</a>	Northern Ireland Housing Executive (NIHE)

**No issues raised by respondent.**

## Council response to key issues raised

### Delivery (including Appendix F: Monitoring indicators)

#### Summary of Responses

5 responses were received that referred to the Delivery section (Chapter 11 and Appendix F) of the draft Plan Strategy. The issues raised included:

- There is scope for **collaborative work** with key partners to ensure effective monitoring and review of policies. This could be taken forward as part of the Council's community planning function;
- Specific comments in relation to the use of **Section 76 Planning Agreements** for access to public roads and protected routes;
- Suggestion that the LDP does not provide any framework for the monitoring of **housing delivery** in accordance with the 'plan, monitor and manage' approach outlined in the SPPS;
- A specific indicator was suggested in relation to Policy EC7: Higher education institutions (HEIs);
- Suggestion that a severity rating should be added to the list of indicators to provide an assessment of the severity of the situation when a 'trigger' is activated; and
- Highlight erroneous reference to 'DfI Rivers' rather than 'NIEA' in indicator 26 of Appendix F.

A number of comments were also made in relation to delivery issues associated with individual policies, but these are addressed within the summaries of the relevant policies.

#### Responses received

Reference	Respondent
<a href="#">DPS-B-AR-X</a>	Antrim and Newtownabbey Borough Council (ANBC)
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure (DfI)

Reference	Respondent
<a href="#">DPS-A-1R-E</a>	Organisation (DPS-A-1R-E)
<a href="#">DPS-B-8G-A</a>	Queen's University Belfast (QUB)
<a href="#">DPS-B-8Z-W</a>	RSPB NI

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
There is scope for collaborative work with key partners to ensure effective monitoring and review of policies. This could be taken forward as part of the	The Council acknowledge the value that can be gained from the involvement of key stakeholders in the monitoring and review of the plan's implementation. This will be particularly true where empirical data identifies issues which can only be fully understood and addressed when seen alongside experiential or qualitative data. It is also likely that addressing such matters arising throughout the

Main Issue	Council Response
Council's community planning function.	<p>plan period can only be undertaken collectively with other stakeholders given the limitations of the Council's statutory powers in relation to things like regeneration, housing, transport and infrastructure (see paragraph 11.1.2 of dPS).</p> <p>Paragraph 11.1.3 therefore acknowledges that the Council's community planning function offers significant scope for the council to drive collaborative working across the City. This includes the need for more innovation in how we collaboratively collect data and monitor performance. Similarly, paragraph 11.2.6 highlights the synergies between the LDP monitoring framework and broader monitoring of key outcomes as part of the community planning process. Likewise, the list of potential corrective steps at paragraph 11.3.2 includes the need to engage with key stakeholders in determining corrective actions.</p> <p>It should also be noted that any formal reviews that are undertaken would also be subject to a formal process, which will include engagement with key stakeholders and a period of public consultation, in line with the Council's commitments to engagement set out in the Statement of Community Involvement.</p>
Specific comments in relation to the use of s76 Agreements for access to public roads and protected routes. Suggest that both planning conditions and planning agreements can be used to secure access to public roads, whilst s76 Agreements are not used to secure access to protected routes.	Comments in relation to the use of Section 76 Planning Agreements are noted. Such detail will be addressed on a case by case basis as part of the development management process.
Suggestion that the LDP does not provide any framework for the monitoring of housing delivery in accordance with the 'plan, monitor and	Section 11.2 of the draft Plan Strategy provides a high level overview of the framework to be established for the monitoring of the plan as a whole. This overview references a series of indicators to be used for this purpose, which are outlined in detail within Appendix F. This includes a comprehensive set of indicators in relation to the full suite

## Council response to key issues raised

Main Issue	Council Response
<p>manage' approach outlined in the SPPS.</p>	<p>of housing policies, including the number of units delivered (Indicators 4 and 5, for example).</p> <p>This includes a series of indicators to be monitored through the housing monitor, which is also heavily referenced within the evidence base prepared to inform the development of the LDP (see Technical Supplement 02: Housing).</p> <p>Monitoring has been ongoing across Belfast since the late 1990s under the former Department for Environment's (DOE) Planning Service and the Council have continued this process since responsibility for planning transferred to the Council in April 2015. This on-going monitoring is summarised through a Housing Land Availability Summary report, published annually for each monitor period. These can be viewed on the Council's website at: <a href="http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/monitoring.aspx">http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/monitoring.aspx</a></p>
<p>A specific indicator was suggested in relation to Policy EC7: Higher education institutions (HEIs), relating to the processing time for planning applications for the development or conversion of floorspace for further or higher education use.</p>	<p>The processing time for planning applications is a regional indicator of planning performance, monitored on a quarterly basis across the whole region by the DfI. The council also utilise this as a regular measure of performance in relation to different types of planning application as part of its continuous drive to improve services.</p> <p>However, there are many reasons that can affect processing times of applications, including for example the quality of information submitted by the applicant and the timeliness of consultee responses. As a measure of a performance of individual policies, the processing times for relevant applications would therefore not provide any reliable measure of how successfully the policy is functioning.</p> <p>Given that Policy EC7 is a positive statement of support in relation to the role of further and higher education institutions, a better indication of problems with delivery would be qualitative commentary from the relevant institutions themselves. However, as this is not a specific and measurable source of data, it would not be appropriate for inclusion within the table of indicators contained at Appendix F. Nevertheless, the Council will continue to liaise with the education sector in relation to individual</p>

Main Issue	Council Response
	<p>applications and will seek to resolve issues as quickly as possible, in partnership with the relevant institutions.</p>
<p>It was suggested that a severity rating should be added to the list of indicators in Appendix F of the draft Plan Strategy to provide an assessment of the severity of the situation when a 'trigger' is activated.</p>	<p>The monitoring framework presented at Appendix F reflects best practice as seen in similar monitoring frameworks contained within other adopted plans. The Council acknowledge that triggers being reached for some indicators may have a greater impact on the plan as a whole than others. However, it is also true that the severity in relation to any particular indicator could vary depending on the specific circumstances. For example, the severity is likely to be lower if a target is exceeded or failed to be reached by a small margin rather than a much larger margin. Similarly, the reason a trigger is reached is likely to have direct implications for the severity of that trigger being reached in terms of the delivery of the overall plan.</p> <p>Given this complexity, it would be too inflexible to try and define a 'severity' for each indicator at this stage. Instead, a qualitative analysis of the implications of triggers being reached would be included as part of the annual monitoring reports and could be informed by the specific circumstances in each case. To be too prescriptive at this stage could feasibly lead to a situation where a plan review is triggered by a relatively minor issues, which can be easily addressed through less fundamental action.</p>
<p>It was also suggested that the list of corrective steps in Section 11.3 should be expanded and applied to the proposed severity grading (see above), i.e. monitoring, training in policy application, provision of SPG, additional research, policy review, plan review, etc.</p>	<p>The list of potential corrective steps step out in paragraph 11.3.2 is not intended to be exhaustive, but instead provides an illustration of some of the steps that would be considered by the Council to help address issues that may arise. As noted above, the complexity involved in understanding the importance of a trigger being activated in each case also means that the corrective action is likely to vary depending on the specific circumstances.</p> <p>It would therefore also be too inflexible to try and define proposed corrective steps for each indicator at this stage. Instead, it is more appropriate to outline proposed corrective action alongside a qualitative analysis of the implications of a trigger being reached as part of the annual monitoring report, which would be informed by the specific circumstances in each case.</p>

## Council response to key issues raised

<b>Main Issue</b>	<b>Council Response</b>
Highlight erroneous reference to 'Dfl Rivers' rather than 'NIEA' in indicator 26 of Appendix F.	Typographical error noted. See also minor modifications.

## 5. Sustainability appraisal responses

### 5.1 Direct sustainability appraisal responses

#### Summary of Responses

Ten respondents made representation directly in respect of the Sustainability Appraisal.

- **Six** respondents find the dPS **unsound** and indicate the underlying reasons for this within the SA.
- **Three** respondents have not stipulated whether they consider the dPS to be sound or unsound, but have provided detailed commentary to highlight concerns and issues identified within the SA.
- **One** respondent finds the dPS sound, and was **supportive** of the promotion equality of opportunity and good relations as a theme throughout the SA.

#### Responses received

Reference	Respondent
<a href="#">DPS-N7-Q-S</a>	Austin Smyth
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter

Reference	Respondent
<a href="#">DPS-B-97-U</a>	Equality Commission for Northern Ireland
<a href="#">DPS-3F-M-HS</a>	NIEA (DAERA)
<a href="#">DPS-NF-6-S</a>	RSPB
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council
<a href="#">DPS-NC-3-S</a>	HED

#### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
<p>Three respondents have provided comments in relation to the Plan, Policy &amp; Programme Review (PPP) within the SA, in particular noting that the PPP is insufficient and should include additional references.</p> <p>It is suggested that the data presented is piecemeal, partial superficial and relies largely on secondary sources not designed for the purpose of setting out a Local Development Plan Strategy, and includes overlap and duplication. UK</p>	<p>The PPP has been compiled at a strategic level to reflect the key, influential plans, policies and programmes that are relevant to the plan, and was based on the most up to date data available at the time.</p> <p>Whilst the PPP in the current SA Report stands at a point in time, the SA process allows for this to be updated in further stages to account for new or more appropriate references where it is considered necessary.</p>

## Sustainability appraisal responses

Main Issue	Council Response
<p>national guidance is suggested as providing a more coherent, comprehensive and robust framework. Additional plans, documents and guidance have been suggested for inclusion in the PPP.</p>	<p>Where additional references are considered to have merit; these can be added to the PPP prior to the next stage of the SA.</p>
<p>Nine respondents have provided comments relating to the evidence base, all of which suggest that the baseline evidence is either incomplete or unsuitable for the purposes of the DPS.</p> <p>One respondent notes that the SA has been written at a strategic level, with an inappropriate baseline. Particular note is made by four respondents of the lack of sufficient evidence to support the appraisal of the tall buildings policy. Additional suggestions have been put forward for inclusion in the baseline evidence.</p>	<p>The SA has been written at a strategic level to reflect the strategic nature of the draft Plan Strategy. Nonetheless, the evidence base which underlies this has been prepared to capture and reflect the key issues that the plan seeks to address, and was based on the most up to date data available at the time.</p> <p>As such the council is satisfied that the evidence base supporting draft Policy DES3 is robust and sufficient to inform the appraisal of policy options and alternatives. Three options were appraised under this policy during the Preferred Options Paper stage of the plan (SA Interim Report, Appendix 4: Assessment of Options), and the council is content that this approach was sufficient for the reasons set out in the SA Interim Report and the Preferred Options Paper (Public Consultation Report - July 2017).</p> <p>These comprised Option 1 (continue maximum/minimum height guidance), Option 2 (specific tall buildings policy) and Option 3 (no policy on tall buildings). The appraisal concluded that Option 2 (specific tall buildings policy) was the preferred option.</p> <p>The LDP is a two part plan. Draft Policy DES3 is a criteria based policy, based on sound planning principles of character. More bespoke policy is likely to emerge at LPP stage, and will be further supplemented with SPG. Further analysis will be carried out at these stages of the plan.</p>



Main Issue	Council Response
<p>Eight respondents have commented on the overall appraisal process, including the SA Framework, the SA Objectives, appraising and the scoring of alternatives and preferred policies.</p> <p>It is suggested that the SA Framework and objectives are incoherent and insufficient, which results in inaccurate policy appraisals, identification of alternatives, and policy scoring within the appraisal. Particular note is made again by four respondents of the tall buildings, which as a result of an insufficient evidence base, has not enabled sufficient scoring of the policy or alternatives.</p> <p>Concerns are also noted in relation to the scoring of natural heritage policies, and the lack of ammonia impact within the appraisal.</p> <p>Suggestions have been put forward in terms of general rewording and amendments.</p>	<p>The SA appraisal has been carried out in full accordance with regional and regulatory guidance, and has been independently scrutinised and assessed through external expertise.</p> <p>The SA Framework and objectives have been identified through the evidence base that underlies the plan, and are considered sufficient to identify and address the key sustainability issues affecting Belfast throughout the plan life and beyond. Identification of policy options, reasonable alternatives, and the scoring of each to establish preferred policy options has been carried out in full accordance with legislation and regulations.</p> <p>The issue relating to the evidence base and appraisal of options for tall buildings has been addressed in the response above.</p>
<p>Two respondents have provided comments relating directly to mitigation measures, specifically noting that additional measures should be included to ensure effective mitigation of potential adverse impacts of the plan. Particular reference is made in relation to growth strategy and infrastructure, and suggested measures have been put forward for inclusion.</p>	<p>The council is satisfied that the proposed mitigation measures are sufficient and fit for the purpose of effectively mitigating potential adverse impacts, based on the evidence available and the outcome of the appraisal.</p>
<p>Four respondents have provided comments in relation to the proposed monitoring identified within the SA, specifically noting that it is inappropriate and incomplete. General suggestions</p>	<p>Whilst the council is satisfied that the proposed monitoring measures are sufficient and fit for the purpose, it is noted that the Monitoring Framework at this stage is still in draft form; the formal Monitoring Framework will be produced within the SA Statement at</p>

## Sustainability appraisal responses

Main Issue	Council Response
<p>have been made for inclusion in the Monitoring Framework.</p>	<p>post-adoption stage. This allows the council to have regard for comments made in consultation, and to inform and strengthen the final framework where it is considered appropriate.</p> <p>Where additional references are considered to have merit, these can be added during finalisation of the formal Monitoring Framework.</p>
<p>Two respondents have provided comments that highlight the length of the SA, and the general wording and language used throughout. Suggestions have been put forward for addition, removal, or updating of wording throughout.</p>	<p>The council accepts that the length of the SA and its accompanying appendices are substantial; however this a direct reflection of the considerable volume of baseline data that has informed the plan, and the substantial suite of previous and current operational policy that the plan will replace. Nonetheless, the SA appraisal has been carried out in full accordance with regional and regulatory guidance.</p>
<p>One respondent has provided comments indicating support for the SA, in particular the promotion of equality of opportunity and good relations is welcomed as a key objective and general theme throughout both the dPS and the SA.</p>	<p>Support for the SA, its key objectives and themes are welcomed.</p>

## 5.2 Draft Plan Strategy responses referencing the sustainability appraisal

### Summary of Responses

20 respondents made representation to the draft Plan Strategy, within which specific comments were made in respect of the Sustainability Appraisal. As the responses were made directly to the draft Plan Strategy, they have been responded to under the relevant draft policies to which they relate.

- **Twelve** respondents find the dPS **unsound** and indicate underlying reasons for this within the SA.
- **Eight** respondents have not stipulated whether they consider the dPS to be sound or unsound, but have provided detailed comments to highlight concerns and issues within the SA.

### Responses received

Reference	Respondent
<a href="#">DPS-B-AP-V</a>	Ards and North Down Borough Council
<a href="#">DPS-B-8N-H</a>	Lisburn & Castlereagh City Council
<a href="#">DPS-B-U5-N</a>	Department for Infrastructure
<a href="#">DPS-A-6X-S</a>	Translink
<a href="#">DPS-B-8B-5</a>	Osborne & Co
<a href="#">DPS-B-A3-Y</a>	Clanmil Housing Association
<a href="#">DPS-B-AJ-P</a>	Beechill Inns Limited
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-AX-4</a>	Lagan Homes
<a href="#">DPS-B-UG-7</a>	Benmore Group and Benmore Octopus

Reference	Respondent
	Healthcare Developments (HK) Ltd.
<a href="#">DPS-B-UJ-A</a>	Royal Belfast Academical Institution
<a href="#">DPS-A-6A-2</a>	LATNER 10
<a href="#">DPS-A-6N-F</a>	Braidwater Ltd.
<a href="#">DPS-A-HZ-D</a>	Wirefox and Bywater Properties Ltd.
<a href="#">DPS-B-UY-S</a>	Northern Ireland Environment Agency
<a href="#">DPS-B-AM-S</a>	Belfast Harbour
<a href="#">DPS-B-AW-3</a>	Lacuna Developments
<a href="#">DPS-B-A8-4</a>	Belfast Harbour Commissioners and Titanic Quarter - Response

### Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main Issue	Council Response
Two respondents have provided comments in relation to draft policy SP1. In particular they note a lack of evidence in relation to infrastructure; a failure to evidence the baseline demographic	Appraisal of the policy options and alternatives considered all relevant transport implications, with a clear view to deliver sustainable patterns of development which reduce the need to travel and prioritise active

## Sustainability appraisal responses

Main Issue	Council Response
<p>growth as a positive outcome; and that neighbouring council's plans have not been referenced in the SA process.</p>	<p>travel and public transport. This included the correlation between location of new homes and subsequent impact on existing infrastructure, as evidenced within the SA.</p> <p>The council believes that in terms of reducing the need to travel and encouraging walking and cycling, it is more sustainable to locate new homes close to employment and services. It is likely that living within the wider metropolitan area will continue to be attractive to many people. This approach aligns with the RDS and wider transportation policy. Furthermore all development will be subject to development management and these requirements will include dealing with infrastructure.</p> <p>The housing growth proposed in the draft Plan Strategy reflects the level of housing required to support baseline employment growth The Housing Growth Options report notes that the HGIs are '<i>an important reference point for the development of planning policy</i>' but analysis indicates '<i>an apparent risk that planning to accommodate population and household growth as projected under the official datasets may result in a changing population profile which will not support anticipated employment growth.</i>' During appraisal of policy options at POP stage, baseline demographic growth recorded significant negative effects against all of the economic SA objectives; positive impacts were only identified against 3 environmental SA objectives (see Appendix 7 of dPS SA).</p> <p>In relation to neighbouring council plans, chapter 3 of the draft Plan Strategy summarises the existing policy context which</p>

Main Issue	Council Response
	<p>affects Belfast's district and neighbouring districts; this is also outlined in greater detail in within the suite of Technical Supplements. Furthermore the SA includes a detailed Plan, Policy &amp; Programme (PPP) Review (Appendix 4 of dPS SA), which allows the council to establish a coherent policy context for the SA, and to ensure that the emerging plan reflects and complies with international, national and local policies. The 'Current Area Plans' section (Appendix 4, page 53) provides reference to all council plans that have been considered during preparation of the draft Plan Strategy.</p>
<p>One respondent has commented in relation to draft policy SP2, highlighting concerns over capacity and funding issues in relation to accommodating the proposed population growth, specifically in relation to SA Objective 16.</p> <p>In terms of capacity, it is noted in SA Appendices 10-11 (SP2 Growth Strategy - SA Objective 16) that issues in the existing wastewater treatment network in Belfast could prove to be a risk in the short term, but that effective infrastructure management throughout the plan period as development progresses will ensure quality and efficiency is maintained in the long term.</p> <p>It is noted that as funding and delivery timescales for the Living with Water Programme have not yet been agreed, wastewater treatment capacity in Belfast therefore should be considered a potential risk in the 'long term'. Furthermore, whilst best efforts will continue to facilitate development; competing priorities and funding</p>	<p>Draft Policy SP2 is an overarching, strategic policy. The council is satisfied that draft Policy HOU1 is sufficiently clear in setting out the requirements to deliver housing population growth. The LDP is an enabling plan designed to help shape the city towards a sustainable future. The markets will inform how the city grows.</p> <p>Para 7.1.9 (page 61 of the dPS) clarifies that '<i>if necessary, land may be phased to ensure alignment of housing delivery with planned infrastructure investment and development lead-times</i>'. Figure 7.2 'Delivery of housing supply' (page 62 of the dPS) illustrates how housing supply can be delivered over the plan period in accordance with the indicative annual rates of delivery.</p> <p>The policy approach was directly informed by the baseline evidence, which includes a number of important studies and reports. For example; the Belfast Population and Housing Growth Study (October 2016) provided a robust review of factors that will have an impact on future population and household growth in Belfast and, therefore, its need for</p>

## Sustainability appraisal responses

Main Issue	Council Response
<p>constraints may affect future development proposals.</p>	<p>housing. The Urban Capacity Study (March 2018) provided a high-level assessment of potential capacity to accommodate future housing and economic development within the district, including the type of housing and density of development appropriate to each site. The 'Assessing Employment Space Requirements' document considers how the demand for employment space is likely to be affected by forecast employment growth in Belfast.</p>
<p>One respondent has provided comments relating to draft policy RD1, noting that the SA refers to the weakness of relying on an outdated transport plan for the assessment of transport implications.</p>	<p>Appraisal of the policy options and alternatives at both the POP and dPS stage was directly informed by the evidence base, as shown in the SA Report and appendices, which at the time of preparation was the most up to date data available to the council.</p> <p>As noted above, housing population growth will be delivered in accordance with the requirements set out in draft Policy HOU1 – Accommodating new homes, (page 61 of the dPS). Para 7.1.9, (page 61 of the dPS) states that '<i>If necessary, land may be phased to ensure alignment of housing delivery with planned infrastructure investment and development lead-times</i>'. Figure 7.2: Delivery of housing supply on page 62 illustrates how the housing supply within policy HOU1 can be delivered over the plan period, in accordance with the indicative annual rates of delivery.</p>
<p>One respondent has provided comments relating to draft policy HOU1. It was noted that clarity is required within the SA regarding the likely infrastructure implications arising from proposed growth, alongside growth in neighbouring areas; and concerns were noted over the use of out-of-date</p>	<p>Appraisal of the policy options and alternatives considered all relevant transport implications, with a clear view to deliver sustainable patterns of development which reduce the need to travel and prioritise active travel and public transport. This included the correlation between location of new homes and subsequent impact on existing infrastructure, as evidenced within the SA.</p>

Main Issue	Council Response
<p>information in relation to assessment of transport implications.</p> <p>It was also highlighted that the SA does not make reference to implications for infrastructure from neighbouring areas, whilst further concerns were raised regarding the sustainability of the growth aspirations in relation to ecosystem services, such as water provision.</p>	<p>As noted under the response to draft Policy SP1, the council believes that in terms of reducing the need to travel and encouraging walking and cycling, it is more sustainable to locate new homes close to employment and services. It is likely that living within the wider metropolitan area will continue to be attractive to many people. This approach aligns with the RDS and wider transportation policy. Furthermore all development will be subject to development management and these requirements will include dealing with infrastructure.</p> <p>Furthermore the council is currently completing an Infrastructure Study, which will help identify where investment is needed and the associated risks. This in turn will inform the next stage of the plan process</p> <p>The Local Policies Plan will address infrastructure requirements at a high level in a supplement to the Delivery chapter of the draft Plan Strategy, which will formally address mitigation measures outlined in the SA. Detailed assessments will be undertaken in response to planning proposals through the development management process, including statutory consultations with the relevant infrastructure providers.</p>
<p>Ten respondents have provided comments relating to draft policy HOU5. It is suggested that the SA does not appraise a sufficient number of reasonable alternatives, and that the draft policy is not based on a robust evidence base. It is further suggested that a more cautious policy approach is required in relation to the viability of 5-10 unit</p>	<p>The evidence base has been prepared to capture and reflect the key issues that the plan seeks to address, and was based on the most up to date data available at the time. This evidence, which the council considers to be robust, outlines significant affordable housing need throughout Belfast.</p> <p>Appraisal at POP stage considered 3 options: the current approach to zoning land</p>

## Sustainability appraisal responses

Main Issue	Council Response
<p>development schemes, as opposed to reactive monitoring.</p>	<p>specifically for social housing; the use of key site requirements; or a threshold based policy.</p> <p>The preferred option of setting a strategic requirement for affordable housing in larger schemes was then expanded further in the dPS SA, with a complex assessment considering the impact of various components including different definitions of affordable housing; the most appropriate site size threshold; the proportion of affordable housing to be required; and specific criteria. This allowed the council to establish the best combination when formulating the proposed policy, and given that the level of affordable housing need in Belfast is such that the provision should be maximised as far as possible; BCC is content that the proposed threshold offers the best balance between addressing need without reducing deliverability.</p> <p>The DSD Three Dragons report advised that 5 units was a '<i>realistic starting point</i>' and that this would lessen the impact on small businesses when compared with application in all cases. A higher threshold (for example 10 units or more) would remove a significant number of schemes from the affordable housing requirements due to Belfast's land supply being characterised by small sites.</p> <p>The adopted Plan will also be subject to annual monitoring and necessary remedial action taken should it become clear that affordable housing provision is more than 10% above/below target. The council will also formally review the plan as a whole every 5 years in line with statutory requirements.</p>



Main Issue	Council Response
<p>Four respondents have provided comments in relation to draft policy DES3, and make particular note of the lack of sufficient evidence to support the appraisal of the tall buildings policy. Additional suggestions have been put forward for inclusion in the baseline evidence.</p>	<p>The council is satisfied that the evidence base supporting draft Policy DES3 is robust and sufficient to inform the appraisal of policy options and alternatives.</p> <p>Three options were appraised under this policy during the Preferred Options Paper stage of the plan (SA Interim Report, Appendix 4: Assessment of Options), and the council is content that this approach was sufficient for the reasons set out in the SA Interim Report and the Preferred Options Paper (Public Consultation Report - July 2017). These comprised Option 1 (continue maximum/minimum height guidance), Option 2 (specific tall buildings policy) and Option 3 (no policy on tall buildings). The appraisal concluded that Option 2 (specific tall buildings policy) was the preferred option.</p> <p>The LDP is a two part plan. Draft Policy DES3 is a criteria based policy, based on sound planning principles of character. More bespoke policy is likely to emerge at LPP stage, and will be further supplemented with SPG. Further analysis will be carried out at these stages of the plan.</p>
<p>One respondent has provided comments in relation to draft policy ENV1, which suggest that the SA is unclear on how other topics have appraised the environmental, social and economic impacts on the marine area.</p>	<p>It is not the intention of BCC to limit the policy to inland water only. The draft policy applies to all of the water environment. The SA should be read in the round, and it is not practical to assess bespoke impacts on every aspect of development at this stage. Full assessment will be carried out at LPP stage.</p>



## 6. Habitats Regulations Assessment responses

### Summary of Responses

Three respondents made representation in respect of the draft Habitats Regulations Assessment (dHRA).

### Responses received

Reference	Respondent
<a href="#">DPS-3F-M-HS</a>	NIEA (DAERA)
<a href="#">DPS-38-6-H</a>	RSPB

Reference	Respondent
<a href="#">DPS-B-A5-1</a>	The National Trust (Northern Ireland)

### Main Issues raised by respondents and Belfast City Council's response

The draft Habitats Regulations Assessment (dHRA) Report on the Belfast Local Development Plan 2035 Draft Plan Strategy was prepared by Shared Environmental Service on behalf of and in conjunction with Belfast City Council. This summary of representations and responses has also been prepared by Shared Environmental Service.

The draft HRA of the draft Plan Strategy for Belfast City Council Local Development Plan (LDP) was prepared in accordance with Regulation 43 of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended). It documents the assessment of the draft Plan Strategy proposals and its potential impacts on European designated sites which include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Ramsar sites are also considered in HRA as a matter of policy. The HRA will be finalised following public consultation and independent examination of the draft Plan Strategy, then published alongside the adopted Plan Strategy. The LPP will be subject to HRA at which stage settlement boundaries, land use zonings and local policies will be reviewed. The need for HRA will also be considered at the planning application stage and assessment carried out where required.

DAERA was consulted on the draft Plan Strategy, Sustainability Appraisal (incorporating Strategic Environmental Assessment) and the dHRA. This consultation was in accordance with Article 43(3) of The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended. DAERA highlighted the need for potential in combination effects of other projects or plans to be addressed. The dHRA recognised this and in-combination and cumulative effects from other plans and projects will be further considered when the HRA is finalised prior to adoption of the Plan Strategy. DAERA considers Natural Heritage Policy NH1 is not sufficiently detailed to take account of international obligations under the Habitats Directive, the Birds Directive or the Ramsar Convention. NH1 supports the planning policies set out in the SPPS without duplicating them. The requirements of the Conservation

## Draft Habitats Regulations Assessment responses

(Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) will apply to all development. DAERA requested clarification of the screening for DC11; this will be addressed when the HRA is finalised. It also had concerns about the potential impact of ammonia emissions from this policy on international sites. The requirements of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) will apply to all development including any projects brought forward under DC11.

Representations were also received from RSPB and National Trust. The issues raised by the National Trust were also raised by RSPB. They acknowledged that the dHRA is at a strategic level however it was considered that there is reliance placed on regional policy, and on avoiding or mitigating adverse effects at later stages. The LPP will also be subject to HRA and the requirements of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) will apply to all development therefore there will continue to be a means to ensure no adverse effect on site integrity throughout the planning process. The mitigation measures are considered appropriate for the dPS stage, however they will be reviewed and, if necessary, clarified when the HRA is finalised prior to adoption of the Plan Strategy. It is suggested that consideration should be given to whether the plan affects the potential of site selection features to adapt to climate change. If future site specific evidence and management plans identify climate change adaptation measures these will be taken into account when the HRA is finalised and at LPP stage. RSPB and National Trust also refer to the need for further consideration of in-combination effects. The dHRA recognised this and in-combination and cumulative effects from other plans and projects will be further considered when the HRA is finalised prior to adoption of the Plan Strategy.

RSPB also went on to provide detailed comment on the content and some of the findings of the dHRA. A number of the points raised are addressed elsewhere in the HRA however the final HRA will be updated to provide clarification. RSPB identified some further sources of information which will be referred to when the HRA is finalised prior to adoption of the Plan Strategy and at LPP stage.

## 7. Errors and suggested minor modifications

### 7.1 Introduction

Following on from the consultations and engagement process a number comments were received which do not go to the heart of the plan or the tests of soundness. These have been categorised under typographical and drafting errors and minor changes. The errors were identified by respondents and ongoing internal review processes. Having considered representations the Council has compiled a table of what are considered to be minor changes which add clarity in some areas but which are not of significance, either individually or cumulatively, in terms of the soundness of the plan.

### 7.2 Typographical and drafting Errors

Policy or Section	Issue	Change
HOU4	A number of respondents note a discrepancy between Policy HOU4 and DES3 Tall Buildings. HOU4 refers to a density based policy approach whereas DES3 only applies to buildings over 35 metres in height, which will be assessed against a criteria based assessment.	Reference to 'Tall buildings within city centre' is a drafting error. Replacement of text to read 'Taller buildings within city centre'.
HOU7	Evidence regarding the accessibility of existing stock is from an English housing survey and therefore not relevant to Northern Ireland.	The footnote reference to the English Housing Survey was a drafting error and can be removed
BH2	Two respondents have commented that clarity is required between criteria j. and k. as there is potential for confusion in their interpretation.	This test should not be optional and can be amended as follows: <ul style="list-style-type: none"> <li>• The term '<i>and/or</i>' should be replaced with '<b><i>and</i></b>'</li> </ul> <p>Criterion k. should be amended to:</p> <p><i>k. The <b>design quality of the proposed redevelopment</b> is considered to enhance the overall</i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<i>character of the conservation area paying due regard to viability of retention or restoration of the existing.</i>
BH2	Highlight erroneous reference to 'HE2A' within policy text.	Reference to 'criteria in HE2a' is a typing error referring to an earlier iteration of draft Policy RD2 'Residential extensions and alterations'. Replacement of text to read ' <b>Policy RD2</b> ' is a minor change.
TRAN7	A respondent stated that guidance on access arrangements are contained in DCAN 15, which was published by DOE, not DfI.	The reference is a drafting error and will be amended. The following amendment will be made to Para 9.4.29 <i>"Access arrangements must be in accordance with the <del>DfI's</del> <b>published guidance</b>"</i>
TRAN 7	A respondent stated that the text reference to Figure 9.3 protected routes map is incorrect as the map relates to Belfast not Northern Ireland.	The following amendment will be made to text in Para 9.4.27 <i>"Figure 9.3 contains an up to date map identifying existing roads throughout <del>Northern Ireland</del> <b>Belfast</b>, established as protected routes."</i>
TRAN8	A respondent stated that the term 'DfI standards' is incorrect and should be replaced with 'published standards'.	The reference is a drafting error and will be amended. Paragraph 4 in the Policy TRAN 8 box will state the following <i>"Proposals involving car parking in excess of the <del>DfI's</del> <b>published standards</b> will only be permitted in exceptional circumstances"</i>
Infrastructure General	One respondent has stated that Technical Supplement 15 Public Utilities contains information on wastewater system capacity provided for BMAP in Appendix D which is out of date. It is stated that TS 15 should be amended to take account and refer to NI Water wastewater system capacity information provided to the	Technical Supplement 15 contains the latest advice in the main body of the document provided to the Council from NI Water at the time of publication in August 2018. The information is outlined in Para 3.26 and was provided by NI Water in February 2017. A further update was subsequently provided to the Council by NI Water in October 2018

## Errors and suggested minor modifications

Policy or Section	Issue	Change
	Council most recently updated in September 2018.	<p>after the publication of the draft Plan Strategy.</p> <p>However, there is a drafting error in Appendix D. Appendix B contains the extract from the BMAP Public Services and Utilities Strategy, Water and Sewerage. This is provided for background policy context purposes only. Appendix B also refers to Appendix D stating that "details of the current programme of upgrade to sewerage infrastructure are provided in Appendix D. This table lists each Waste Water Treatment Works throughout the Plan Area in five categories based on their capacity".</p> <p>An editing error at the time of the TS collation and finalisation resulted in this table being extracted and mistakenly reproduced as a standalone appendix entitled Appendix D. An amendment will be made to delete Appendix D and incorporate the table into BMAP text outlined Appendix B.</p>
Delivery	Highlight erroneous reference to 'Dfl Rivers' rather than 'NIEA' in indicator 26 of Appendix F.	Typographical error. Replacement of text is a minor change.

### 7.3 Minor Changes

Policy or Section	Issue	Change
Chapter 4 Vision, Aims and Objectives	Concern was raised that there was not a commitment to positive action such as demand management of the private car.	The Council suggest the following minor amendment to the 2 <sup>nd</sup> objective for Building a smart connected and resilient place. <i>"To ensure availability of land to facilitate sustainable patterns of development <b>whilst supporting demand management measures</b> and <del>promote</del> to <b>encourage</b> travel by more sustainable modes of transport".</i>
Chapter 4 Vision, Aims and Objectives	A change in wording was requested in relation to car parking, to change 'suitable' to 'appropriate'	A minor amendment to wording to use the terminology 'appropriate' rather than 'suitable' can be made without affecting the soundness of the plan as follow:  <i>"And promote increased use of public transport whilst retaining <del>suitable</del> <b>appropriate</b> provision for cars."</i>
Strategic Policies	George Best Belfast City Airport highlighted the role of the airport as an enabler of growth.	Although the role of George Best Belfast City Airport is acknowledged as part of the spatial development strategy (see Policy SD2: Settlement areas), the important 'regional gateway' role of the broader harbour area, including the port and airport and their support for the regional economy could be referenced more generally within the introduction to the strategic policies and at the LPP stage.
SP1	George Best City Airport suggest that justification and amplification to accompany this policy should acknowledge that the Airport's strategic role as a key gateway and driver of regional economic development. They note the importance of optimising existing airport capacity and suggest a need for reference to the potential for airport growth over the Plan period.	The Council suggest the following text be added as a second sentence within Paragraph 5.0.3:  <i>"Belfast's harbour area, via the port and Belfast City Airport, provides a</i>



## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<i>gateway to Britain, Europe and the rest of the world. They will continue to act as an enabler of wider economic growth throughout the plan period."</i>
SP2	Role of the historic and natural environment recognised in creating sustainable development. The term historic environment should be included in the definition to make the policy sounder.	<p>In paragraph 5.2.2 The Council suggest the following words (in bold) are added:</p> <p>"...the Council shall protect and enhance the city's built heritage and the natural <b>and historic</b> environment".</p> <p>"...careful stewardship of the built heritage and the natural <b>and historic</b> environment".</p>
HOU9	Emergency halting sites are not included in the list of Traveller facilities.	<p>An 'Emergency Halting Site', do not usually require planning permission due to the temporary nature of their use. If such a site is to be used more regularly or for longer periods of time, Policy HOU9 would apply. To aid clarity, the Council suggest the following additional justification and amplification text before Paragraph 7.1.60:</p> <p><i>"The Caravans Act (Northern Ireland) 1963 (as amended in 2011) also includes an 'Emergency Halting Site' (sometimes referred to as a 'Temporary Stopping Place') as a form of traveller facility. However, such a site provides a temporary place for travellers to park (usually for 1 or 2 nights) with appropriate facilities. However, as such a site is in short-term, temporary use (i.e. less than 28 days), this will not normally require planning permission."</i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
HOU12	There is no explicit reference to 'specialist housing' in the Policy Aims (Para. 7.1.5). An additional policy aim was proposed to address this, referring to specialist housing needs, shared housing, student accommodation and traveller accommodation.	The addition of a policy aim in line with the wording suggested by the respondent has merit and is a minor amendment for clarity. The following text should be inserted at the end of the bullet point list under Paragraph 7.1.5:  <i>"Ensure an appropriate supply of housing to provide for those with specialist housing needs including specialist residential accommodation and care-related facilities, specific accommodation for travellers, shared forms of housing and purpose built student accommodation."</i>
HOU12	The justification and amplification should clarify that HOU5 does not apply to proposals under Policy HOU12.	In addition to the clarity that will be provided by the proposed SPG on affordable housing, clarification that affordable housing requirements would not apply in the case of PBMSA could also be made through a minor amendment to the justification and amplification text. We therefore suggest the addition of the following text (in bold) within Paragraph 7.1.80:  <i>"Consequently, occupancy of PBMSA will usually be conditioned to limit occupation to students, particularly during term times. <b>As such PBMSA developments will not normally be required to meet affordable housing requirements in accordance with Policy HOU5.</b> A management plan will be required to ensure a quality, safe and attractive place for residents..."</i>
HOU13	Supported the siting approach of criterion C, but suggested the	Defining 'close proximity' has merit as a minor amendment to aid clarity. The intention is that close proximity

Policy or Section	Issue	Change
	policy could be more effective if 'close proximity' was defined.	<p>would refer to a reasonable walking distance to encourage active travel. As this distance may vary in different circumstances, it is suggested that a minor change be made to the justification and amplification text. We therefore suggest the following text (in bold) be added to Paragraph 7.1.85:</p> <p><i>"As part of the tourism offer of the city, the policy also aims to ensure that short-term let accommodation is conveniently located within existing tourism clusters and in close proximity to visitor attractions. <b>A location within walking distance of an existing visitor attraction will allow relative ease of access, promoting walking and cycling.</b> In line with wider sustainability goals, there should also be good access to public transport."</i></p>
DES1	Minor amendments to justification text (7.2.9) regarding listed buildings and built heritage areas to include <i>"areas of built heritage, including conservation areas and areas of townscape character"</i>	<p>An amendment of the Plan to this effect within the justification text is considered to have merit as a means of clarification. We therefore suggest the following text (in bold) to be added to paragraph 7.2.9:</p> <p><i>"New and replacement shopfronts should complement the design of the host building and relate to the elevational qualities of the upper floors and where appropriate characteristics and detailing of neighbouring shopfronts, particularly in the case of listed buildings and areas of built heritage <b>including conservation areas and areas of townscape character.</b>"</i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
DES2	It has been suggested that justification text 7.2.27 should replace the policy criteria (j).	<p>A minor amendment of the nature suggested has merit as a means of clarification. We therefore suggest the following wording (in bold) to be added to policy criteria (j);</p> <p><i><b>“Seek the retention of existing trees within and around the site and make adequate provision to allow them to mature while ensuring the continuance of tree cover through new planting.”</b></i></p>
DES2	The policy should be clarified as to when this policy applies. It is likely that a larger site hectare as opposed to unit numbers would facilitate a proper masterplan.”	<p>Further clarification on what constitutes ‘major development’ can be added to justification and amplification text. we therefore suggest the following wording (in bold) to be added to the justification text paragraph 7.2.21</p> <p><i>“The LDP sets out a masterplanning approach in order to effectively manage the form, appearance and phasing of new major developments <b>(major development is defined as those ‘major development applications’ defined by section 26(1) of The Planning Act (Northern Ireland) 2011).</b>”</i></p>
DES3	Criteria (b) – one response suggested the inclusion of the word ‘setting’ and removal of word ‘designated’ so that it reads ‘Do not have an adverse impact on the <i>setting</i> , character and appearance of listed buildings, <del>designated</del> conservation areas, areas of townscape character (ATC’s) and historic monuments /gardens’.	<p>An amendment of the Plan to this effect is An amendment of the Plan to this effect is could provide greater clarity without changing the emphasis of policy or consideration. We therefore suggest the following wording (in bold) to be added to criteria (b):</p> <p><i>“Do not have an adverse impact on the <b>setting</b>, character and appearance of listed buildings, <del>designated</del> conservation areas, areas</i></p>

Policy or Section	Issue	Change
		<i>of townscape character (ATCs) and historic monuments/gardens;"</i>
DES3	Text within the dPS makes no reference to any locational based assessment in the future however Technical Supplement No.6 states that further detailed analysis will be carried out at LPP stage. Clarification sought.	An amendment which seeks to clarify locational based policies at LPP stage within the justification text. We therefore suggest the following wording to be added to the justification text within paragraph 7.2.31;  <i>Further locational based policies will be assessed at LPP stage.</i>
RD1	Objection to the apparent exclusion of HMO areas (e.g. Stranmillis) as residential areas and does not seek to address residential areas that are primarily of a HMO nature.	A review of the proposed definition at Appendix B has merit to help provide greater clarity. Such a minor amendment can be made without affecting the overall soundness of the plan. The first two paragraphs of Appendix B should therefore be amended as follows:  <i>"An established residential area is normally taken to mean residential neighbourhoods dominated by a <b>recognisable form of</b> <del>single family</del> housing <b>styles</b> with associated private amenity space or gardens. These areas may include buildings in commercial, retail or leisure services use, usually clustered together and proportionate in scale to the size of the neighbourhood being served.</i>  <i>Within Belfast City, established residential areas often display a clear spatial structure. Building forms, plot sizes and shapes are sometimes similar with a well defined pattern of local development. Properties may exhibit comparable design styles including common architectural</i>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<p><i>detailing and treatments, <b>and areas of both public and private amenity space and together with the private gardens of properties can share an identifiable character.</b> are frequently defined with mature trees, shrubs and hedgerow planting. The overall spatial structure is often..."</i></p> <p>The remaining text within the Appendix would remain unchanged.</p>
RD3	<p>At para 7.3.29, reference is made to "living over the shop", a grant scheme which closed some years ago. This reference should be removed on the basis that it falls within the broader aim to facilitate city centre living.</p>	<p>The removal of the reference to 'living over the shops' would help provide greater clarity and is a minor amendment. The Council suggest that Paragraph 7.3.29 be reworded as follows:</p> <p><i>"Conversions of upper floorspace above commercial premises for residential use, sometimes referred to as 'living over the shop', can make a small but valuable contribution to the promotion of high-density development in key locations such as city centre, local and district centres and city corridors..."</i></p>
BH2	<p>Two respondents have provided comments suggesting that specific amendments are required to provide further clarity and strength to the draft policy. In particular it was noted that the policy fails to explain the term 'prior agreement' under draft Policy BH2, and have suggested the rewording of text to provide better clarity.</p>	<p>Whilst it is considered that the policy approach is consistent with regional policy and the draft policy adequately secures the protection of conservation areas, minor rewording to the policy and the J&amp;A would assist its interpretation.</p> <p>The Council suggests that the final sentence under Policy BH2, sub-heading 'Demolition' be reworded as follows:</p>

Policy or Section	Issue	Change
		<p><i>“Where consent is granted for demolition this will <b>normally</b> be conditional on prior agreement for the redevelopment of the site, and appropriate arrangements for recording the building before its demolition.”</i></p> <p>Paragraph 7.4.20 should then include the following, additional point of clarification:</p> <p><i><b>“Where consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site; prohibition of demolition until contracts have been signed for the approved redevelopment of the site; and, where appropriate, the recording of the building prior to its demolition.”</b></i></p>
BH2	One respondent has highlighted the need to include the word ‘Patina’ with regards to how new buildings are to reflect historical buildings.	<p>The Council suggests that the last line of Paragraph 7.4.18 be reworded to include reference to ‘patina’ as follows:</p> <p><i>“...elevational form / appearance as ascribed by composition and architectural detailing of elements (doors / windows, bay rhythm, cornices, roof silhouette, <b>patina</b> etc.).”</i></p>
BH2	One respondent has noted that there is no justification why façade retention will not generally be permitted in conservation areas.	<p>Whilst it is considered that the policy approach is consistent, and the draft policy adequately secures the protection of conservation areas, minor rewording would assist its interpretation.</p> <p>The Council suggests that Paragraph 7.4.21 be reworded as follows:</p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<p><i>'Façade retention will not generally be permitted in conservation areas and where <b>of a building which makes a contribution to the character and appearance of the conservation area will only be acceptable in exceptional circumstances, provided the scale of the overall development proposal will not be detrimental to the character or appearance of the area, and the scheme can be implemented without serious risk to the retained structure.</b> Where a case is made for total or partial demolition...'</i></p>
BH2	<p>One respondent has indicated that there is a conflict between Policies BH2 and BH3 with regards to demolition consent and agreements prior the redevelopment of a site.</p>	<p>Whilst it is considered that the policy approach is consistent, minor amendments to wording relating to demolition can be made as a means of consistency or clarification. These amendments have been addressed in full in relation to Policy BH2 above, and below in relation to Policy BH3.</p> <p>BCC does not agree that the reference to signing a contract should be removed altogether, rather a minor amendment to wording will enable an element of flexibility whereby such a requirement can be requested where the council deems it appropriate.</p>
BH3	<p>Two respondents have provided comments suggesting amendments to the draft policy. Comments highlight that the wording and inclusion of "Where demolition consent is granted this will be conditional</p>	<p>As with Policy BH2, whilst it is considered that the policy approach is consistent with regional policy and the draft policy adequately secures the protection of Areas of Townscape Character; minor rewording would assist its interpretation.</p>



## Errors and suggested minor modifications

Policy or Section	Issue	Change
	<p>on prior agreement for the development of the site, including prohibition of demolition until contracts have been signed for the approved redevelopment of the site" is an onerous test and request its removal from the policy.</p>	<p>The Council suggests that the final sentence under Policy BH3, sub-heading 'Demolition' be reworded as follows:</p> <p><i>"Where consent is granted for demolition this will <b>normally</b> be conditional on prior agreement for the redevelopment of the site, <b>and appropriate arrangements for recording the building before its demolition.</b>"</i></p> <p>Paragraph 7.4.25 should then include the following, additional point of clarification:</p> <p><i>"Where consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site; prohibition of demolition until contracts have been signed for the approved redevelopment of the site; and, where appropriate, the recording of the building prior to its demolition."</i></p> <p>BCC does not agree that the reference to signing a contract should be removed altogether, rather a minor amendment to wording will enable an element of flexibility whereby such a requirement can be requested where the council deems it appropriate.</p>
BH3	<p>One respondent has indicated that there is a conflict between BH2 and BH3 with regards to demolition consent and</p>	<p>Making the minor amendments noted above will remove any conflict between Policy BH2 and Policy BH3.</p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
	agreements prior the redevelopment of a site. It is suggested that the reference to the signing of a contract should be excluded from Policy BH3 and, in line with Policy BH2, replaced with 'appropriate arrangements for the redevelopment of the site'.	As noted BCC does not agree that the reference to signing a contract should be removed from either policy, rather minor amendments to wording will enable an element of flexibility whereby such a requirement can be requested where the council deems it appropriate.
BH3	One respondent has requested that clarification is provided in the justification and amplification text for Policy BH2 and BH3 regarding demolition.	Making the minor amendments noted above will provide suitable clarification for both policies.
EC 2	Clarification as to whether the quantum within this policy relates to developable land or employment floorspace.	The Council suggest that first line of the policy be reworded as follows:  <i>A total of 550,000sq. m of gross <del>developable land</del> <b>floorspace</b> for employment uses (B Uses as set out in the Planning Use Classes Order (NI) 2015) shall be provided over the plan period to meet the needs of the city.</i>
RET 1	Definition of edge of centre departs from previous definition in that it includes District/Local Centres. This conflicts with SPPS, where edge of centre locations considered to be 300m from Town Centre Boundary.	To provide greater clarity the Council suggest that the second paragraph of the policy be reworded as follows:  <i>The sequential approach directs development <del>within</del> <b>to the town</b> centre before considering an edge of centre site. Consideration will be given to an edge of centre location before considering an out of centre site.</i>
Transportation	Respondent stated the importance of the airport as a key gateway which has a regional role, providing strong connectivity to locations outside of Belfast to the rest of the UK	The map in Figure 9.2 is illustrative and can be updated to include the airport. This is a minor amendment in line with the policy approach outlined in dPS.

Policy or Section	Issue	Change
	and beyond. The RDS seeks to deliver a balanced approach to transportation infrastructure by improving connectivity and this should be reflected in the LDP aims. Figure 9.2 should be updated to include the airport.	
Transportation	9.4.3 Paragraph should also make reference to the departments extant transport plan.	The proposed addition will provide clarification to the transportation section and will state the following: <b><i>"The Departments extant Transport Plan will be the main source for transport policy and initiatives for the plan area"</i></b> .
TRAN7	One respondent stated that it is not expected to deliver access onto protected routes through Section 76 Planning Agreements.	The tick can be removed from the table, indicating the potential for delivery through Section 76 Planning Agreements. This is a minor amendment.
ITU4	It is noted in criteria (d) there is no reference to water quantity. The SPPS (6.224) goes further than previous policy to recognise this criteria extends to water quality and quantity.	Policy ITU 4 can be amended to include a reference to water quantity in line with SPPS. The proposed change is considered a minor amendment. Criteria (d) will state <b><i>"local natural resources, such as air quality, <del>or</del> water quality or quantity; and"</i></b>
ENV1	Policy specifically appears to limit the consideration of water quality to inland water and excludes "transitional and coastal waters", particularly in relation to the Water Framework Directive.	It is not the intention to limit the policy to inland water only and the policy applies to all water environments. This could be clarified in the supporting narrative as follows:  <i>9.5.20 The Water Framework Directive.... All development must have regard to the potential impacts on the quality of the water environment, including coastal and transitional waters,</i>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<i>rivers, lakes, reservoirs and groundwater. In addition, .....</i>
ENV1	Removal of the wording 'positively address' in relation to the protection of the city's designated quiet areas.	<p>It is not intended that new development should result in betterment, rather that the proposals take full account of any quiet area designation. The wording could be clarified to omit "positively" as it is superfluous in its context and the remaining policy wording still requires the listed matters to be addressed, as follows:</p> <p><b>Draft Policy ENV1</b>  <i>....The council will also require development to <del>positively</del> address the following: ....</i></p>
ENV3	Need to strengthen wording in line with SPPS to include the wording "coastal erosion and land instability".	<p>Whilst this is set out in the SPPS, the wording "coastal erosion and land instability" could be added to the listed matters in the interests of clarity, as follows:</p> <p><b>Draft Policy ENV3</b>  <i>Planning permission will be granted....  Measures to help adapt to the potential impacts may include the following:</i></p> <ol style="list-style-type: none"> <li data-bbox="895 1525 1374 1644"><i>a. Managing <b>coastal erosion, land instability</b>, flood risk and promoting SuDS;</i></li> <li data-bbox="895 1650 1299 1686"><i>b. Protecting and enhancing....</i></li> </ol> <p><i>In order to minimise the impact of extreme weather conditions, new developments should also embed resilience to current and future climates, including: .....</i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<p><i>i. Demonstrate how the development is resilient to flood events, <b>coastal erosion and land instability</b></i></p>
OS4	<p>The policy has different wording emphasis from SPPS in relation to ‘appropriate activities’ and ‘appropriate locations’.</p>	<p>It is not intended that the policy approach should infer a change in emphasis from the SPPS. The suggested minor amendment to wording could aid clarity, as follows:</p> <p><b><i>Draft Policy OS4</i></b>  <i>Planning permission will be granted for the provision of <del>new</del> <b>appropriate</b> open space facilities, including for sport and outdoor recreation, at appropriate locations in the countryside area of the district where it is demonstrated that that it is acceptable in terms of environment and rural amenity and would not be better located within settlement limits or on previously developed land. All the following criteria must also be met:.....</i></p>
OS5	<p>OS5 policy needs to accord more closely with SPPS wording for sports stadia outside settlement limits in particular.</p>	<p>It is not intended that the policy approach in both OS4 and OS5 is different in relation to sports stadia. Whilst both policies may be applied where relevant, the suggested minor amendment to wording could aid clarity, as follows:</p> <p><b><i>Existing draft Policy OS5</i></b>  <i>Planning permission will be granted for the provision of new or extended intensive sports facilities where these are located at appropriate and accessible locations within settlement limits. <b>In exceptional cases a stadium may be considered</b> <del>where intensive sports facilities are proposed</del> outside settlement limits</i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
LC1	Omission of precautionary approach & LC1A, B & C - needs further clarity on criteria as may conflict with LC1.	<p><b>where the following criteria are met:.....</b></p> <p>Whilst it is considered that the policy approach is consistent between the different landscape designations, the precautionary approach could be included into the policy in aid of clarity, as follows:</p> <p><b>Draft Policy LC1</b>  <i>New development should seek to protect and, where appropriate, restore or improve the quality and amenity of the landscape. <b>The council will adopt the precautionary approach in assessing development proposals in any designated landscape, and will give careful consideration to the following:....</b></i></p>
DC1	Policy not in line with SPPS in relation to clustering of development as it allows exemptions by stating "where possible and appropriate". (6.69)	<p>The wording of the policy does not diverge from the SPPS policy approach. The words "where possible and appropriate", are superfluous and there may be merit in the suggested minor re-wording to remove them as follows:</p> <p><b>Draft Policy DC1</b>  <i>All proposals for development in the countryside must be sited and designed to integrate sympathetically with their surroundings and to meet other planning and environmental considerations, including for environmental protection, water quality and drainage, access and road safety. <del>Where possible and appropriate, permissible.</del> <b>New development should seek to cluster with and consolidate existing built development.</b></i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
DC10	Should be no exceptions to 10-year rule to be consistent with SPPS	<p>It is not intended that the policy diverges from the SPPS approach, and provides for new dwellings on farms, without exceptions to the 10-year rule. There may be merit to omit the wording "exceptional circumstances" or "clear operational need" to clarify this, as follows:</p> <p><b>Draft Policy DC10</b></p> <p><i>.....Planning permission granted under this policy will only be forthcoming once every 10 years. <del>unless there are exceptional circumstances that demonstrate clear operational need.</del></i></p>
DC11	The 6 years rule in SPPS has been omitted from the policy	<p>It is not intended to diverge from the SPPS approach on the 6-year rule. Nevertheless, there may be merit in incorporating the rule in the interests of clarity, as follows:</p> <p><b>Draft Policy DC11</b></p> <p><i>Planning permission will be granted for development proposals on an active and established (<b>for a minimum of 6 years</b>) agricultural or forestry holding where it is demonstrated that it is necessary for the efficient use of the agricultural holding or forestry enterprise....</i></p>
DC12	The 6 year rule in SPPS has been omitted from the policy	<p>It is not intended to diverge from the SPPS approach on the 6-year rule. Nevertheless, there may be merit in incorporating the rule in the interests of clarity, as follows:</p> <p><b>Draft Policy DC12</b></p> <p><i>....</i></p> <p><i>a. The farm or forestry business is currently active and established (<b>for a minimum of 6 years</b>) and it is</i></p>

## Errors and suggested minor modifications

Policy or Section	Issue	Change
		<i>demonstrated that the proposed use/development will be run in conjunction with the agricultural operations on the farm.....</i>



## Appendix A: Engagement events undertaken during draft Plan Strategy consultation period

Partnership / Forum / Workshop / Working Group	Date of engagement
Launch of the plan consultation, City Hall	23 August 2018
Environmental Resilience Working Group	24 August 2018
Innovation Factory (West Belfast) Community Engagement Event	29 August 2018
Girdwood (North Belfast) Community Engagement Event	30 August 2018
Housing Working Group – Residential Design and City Centre Living Workshop	03 September 2018
Housing Working Group – Settlement Strategy/New Homes and Affordable Housing/Housing Mix Workshop	04 September 2018
Housing Working Group – Shared Housing and Specialist Accommodation Workshop	05 September 2018
Urban Design and Built Heritage working group	10 September 2018
Metropolitan Area Spatial Working Group	12 September 2018
Seniors' Forum – Healthy Ageing Strategic Partnership	12 September 2018
Retail Working Group	13 September 2018
Eastside Partnership Board Meeting	14 September 2018
Bilateral meeting with Retail NI	14 September 2018
Water and Sewerage Working Group	14 September 2018
Metropolitan Area Spatial Working Group	17 September 2018
Green and Active Working Group	17 September 2018
Retail Working Group	17 September 2018
Environmental Resilience Working Group	18 September 2018
Skainos (East Belfast) Community Engagement Event	18 September 2018
Eastern Economic Corridor – Local Authority Workshop, Co. Meath	19 September 2018
Transport working group	19 September 2018
LDP and Developers Framework Launch Event, City Hall – including presentations, staff and public drop in session	20 September 2018
Belfast Hill Partnership Board Meeting	20 September 2018
Belfast Hills Partnership member's meeting	20 September 2018
Minerals Working Group	24 September 2018
BCC Youth Council Forum	24 September 2018
Shared City Strategic Partnership	25 September 2018
Olympia (South Belfast) Community Engagement Event	25 September 2018
South Belfast Partnership Community Support Group event	26 September 2018
Queen's University Belfast (QUB) Planning Lecture	27 September 2018
Waste Working Group	27 September 2018
University of Ulster (UU) Planning Lecture	27 September 2018
Principal Planning Officers working group, Mid and East Antrim	28 September 2018
Internal Departmental Management Team meeting	01 October 2018
Belfast Healthy Cities	03 October 2018

## Appendix A

Partnership / Forum / Workshop / Working Group	Date of engagement
Royal Institute of Chartered Surveyors (RICS)	03 October 2018
Royal Ulster Architectural Society	04 October 2018
John Simpson, Housing Association	05 October 2018
Festivals Forum Steering Group Meeting	05 October 2018
Sustainable Water Strategy Workshop with DfI	08 October 2018
West Belfast Partnership Board	09 October 2018
Planning Industry Workshop	10 October 2018
George Best Belfast City Airport (GBBCA) Consultative Committee	10 October 2018
Inner South Neighbourhood Partnership	11 October 2018
Equality Consultative Forum	11 October 2018
NI Federation of Housing Associations, Annual conference	12 October 2018
NI Environment Link - Belfast Agenda and LDP Event	12 October 2018
NIHE staff event	12 October 2018
Equality Commission	12 October 2018
Forward South Partnership Board	16 October 2018
Edenderry Residents' Association	16 October 2018
University of Ulster (UU)	17 October 2018
Ards and North Down Special Planning Committee	17 October 2018
Royal Institute of Chartered Surveyors (RICS)	18 October 2018
PLACE - Open House Belfast Architecture Festival	19 October 2018
Belfast Civic Trust	22 October 2018
Landlords Association for NI – Wellington Park Hotel	24 October 2018
Internal Place and Economy Insights	23 October 2018
Translink	24 October 2018
Ligoniel Improvement Association	25 October 2018
Internal Corporate Policy Unit Lunchtime Forum	26 October 2018
Turley LDP Meeting	26 October 2018
Be Prepared Event, Finaghy Community Centre	30 October 2018
NI Council for Voluntary Action (NICVA), LDP and Developer Contributions Framework event	01 November 2018
CO3 Health and Wellbeing Meeting	13 November 2018
Sustrans Information Session	13 November 2018

## Appendix B: Respondents

The following organisations / individuals provided a response to the draft Plan Strategy consultation:

- Adam Armstrong
- Áine Groogan
- Antrim and Newtownabbey Borough Council
- ARdMackel Architects
- Ards and North Down Borough Council
- Ashton Community Trust
- Austin Smyth
- Beechill Inns Limited
- Belfast Chamber of Trade & Commerce
- Belfast Civic Trust
- Belfast Harbour
- Belfast Harbour Commissioners and Titanic Quarter
- Belfast Healthy Cities
- Belfast Hills Partnership
- Belfast Natural History and Philosophical Society
- Belfast Royal Academy
- Ben McClelland
- Benmore Group and Benmore Octopus Healthcare Developments (HK) Ltd
- Braidwater Homes
- Braidwater Ltd
- Carvill Developments Limited
- Cathedral Quarter Trust
- Chartered Institute of Housing
- Clanmil Housing Association
- Clyde Shanks Ltd
- Cohousingni
- Colin McAuley Planning
- Conrad Kirkwood
- Construction Employers Federation
- Co-Ownership Housing
- Corbo Ltd
- Declan Hill
- Department for Communities
- Department for Infrastructure
- Department of Communities – Historic Environment Division
- Destination CQ Ltd (Business Improvement District)
- Eastside Partnership
- Equality Commission for Northern Ireland
- Falls Community Council
- George Best City Airport
- Heron Bros
- Historic Buildings Council
- Historic Monuments Council
- Hughes McMichael
- Invest Northern Ireland
- Ireland Brownfield Network
- Killultagh Estates
- Kilmona Holdings Limited
- Lacuna Developments
- Lagan Homes
- LATNER 10
- LATT Ltd
- Lidl Northern Ireland GmbH
- Lisburn & Castlereagh City Council
- Markets Development Association
- Ministerial Advisory Group (MAG) for Architecture and the Built Environment for Northern Ireland
- Northern Ireland Environment Agency
- Northern Ireland Environment Link
- Northern Ireland Federation of Housing Associations
- Northern Ireland Housing Executive
- Northern Ireland Water
- Osborne & Co
- Pdraig Walsh

## Appendix B

- PowerOn technologies Ltd t/a The Electric Storage Company
- Project Hope
- Queen's University Belfast
- Respondent
- Retail NI
- Royal Belfast Academical Institution
- RSPB NI
- Sandy Row Community Forum
- Shared City Partnership
- Sinn Fein
- SONI
- Sustrans, Northern Ireland
- The National Trust (Northern Ireland)
- The Royal Mail Group (RMG)
- Theatres Trust
- Total Architecture
- Translink
- Ulster Architectural Heritage
- West Belfast Partnership Board
- Wirefox and Bywater Properties Ltd
- Woodland Trust

In addition to those listed above, a number of respondents asked to remain anonymous. This included:

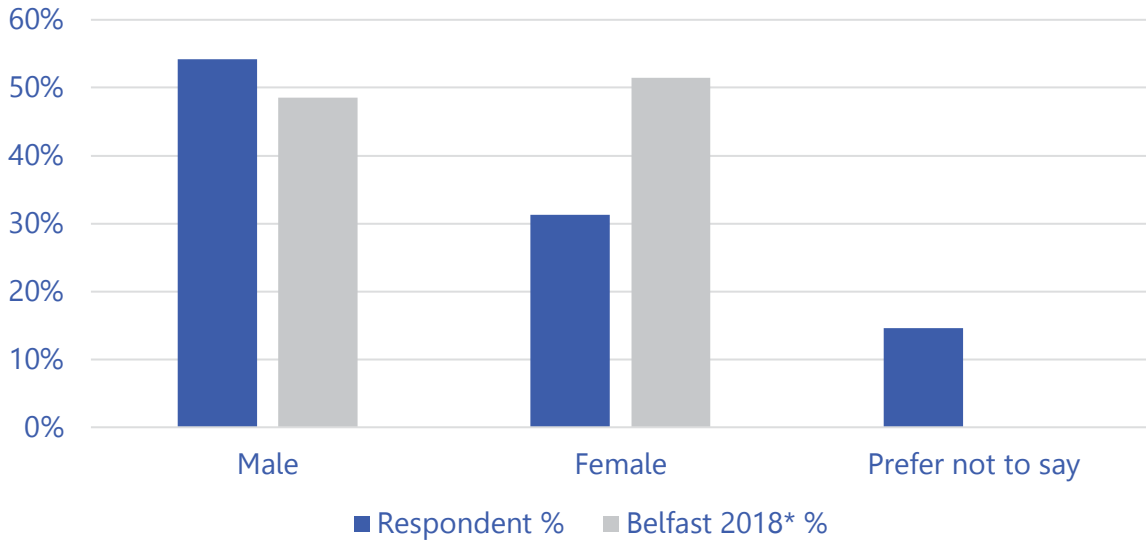
- 16 organisation; and
- 10 individuals.

## Appendix C: Equality Monitoring

Of respondents who completed the equality monitoring section of the draft Plan Strategy consultation responses:

### Gender

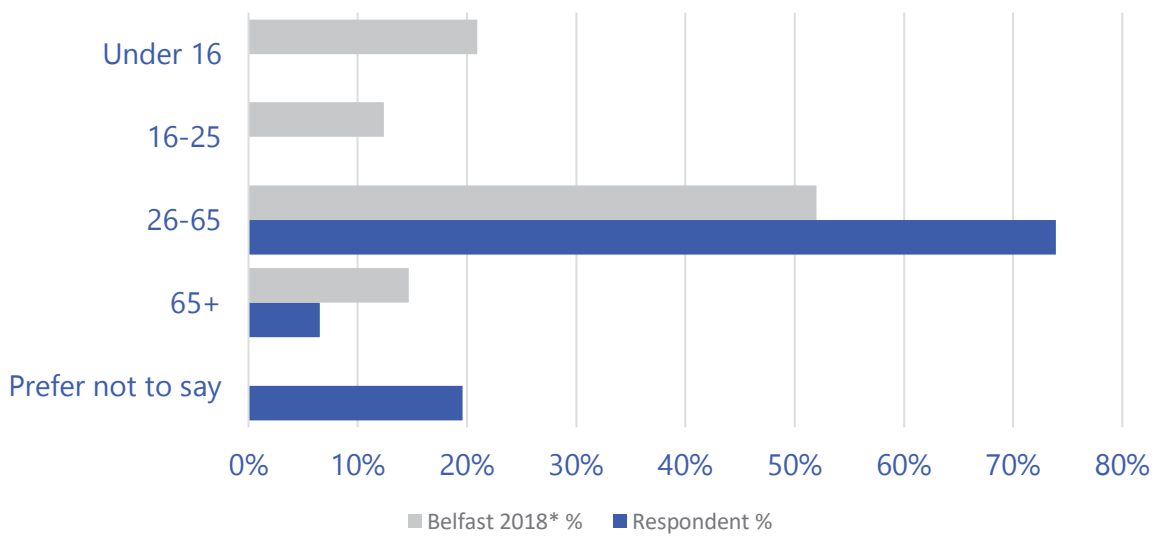
This was answered by 48 respondents (43.6%)



\* Belfast 2018 Mid-year population estimates

### Age

This was answered by 46 respondents (41.8%)



\* Belfast 2018 Mid-year population estimates

## Appendix C

### Marital Status

This was answered by 44 respondents (40%)

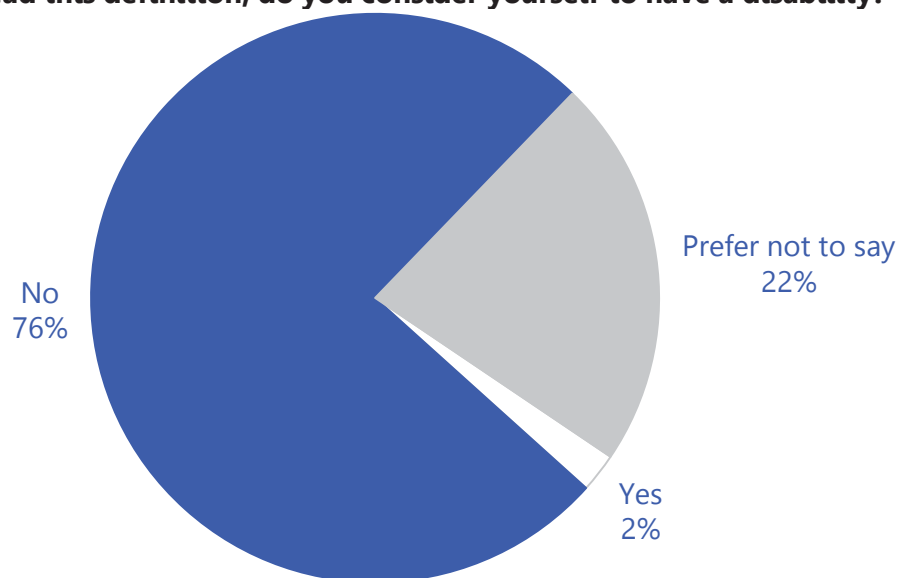
	Count	Percentage
Single (never married or in a same sex civil partnership),	5	11.4%
Married, or registered in a same sex civil partnership	27	61.4%
Living together as if you are married or in a same sex civil partnership	2	4.5%
Separated, divorced, or formerly in a same sex civil partnership that is now dissolved	1	2.3%
Widowed, or surviving partner from a same sex civil partnership	0	0.0%
Other please specify (comment box)	0	0.0%
Prefer not to say	9	20.5%
<b>Total</b>	<b>44</b>	

### Disability

This was answered by 44 respondents (40%).

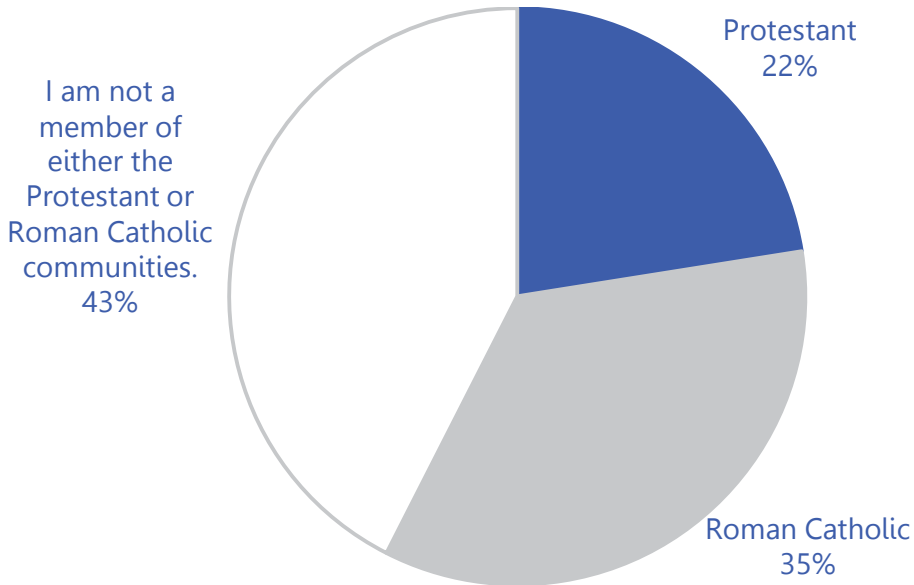
Under the Disability Discrimination (NI) Act 1995 a disabled person is defined as a person with: "A physical or mental impairment, which has a substantial or long term adverse effect on their ability to carry out a normal day's activities."

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



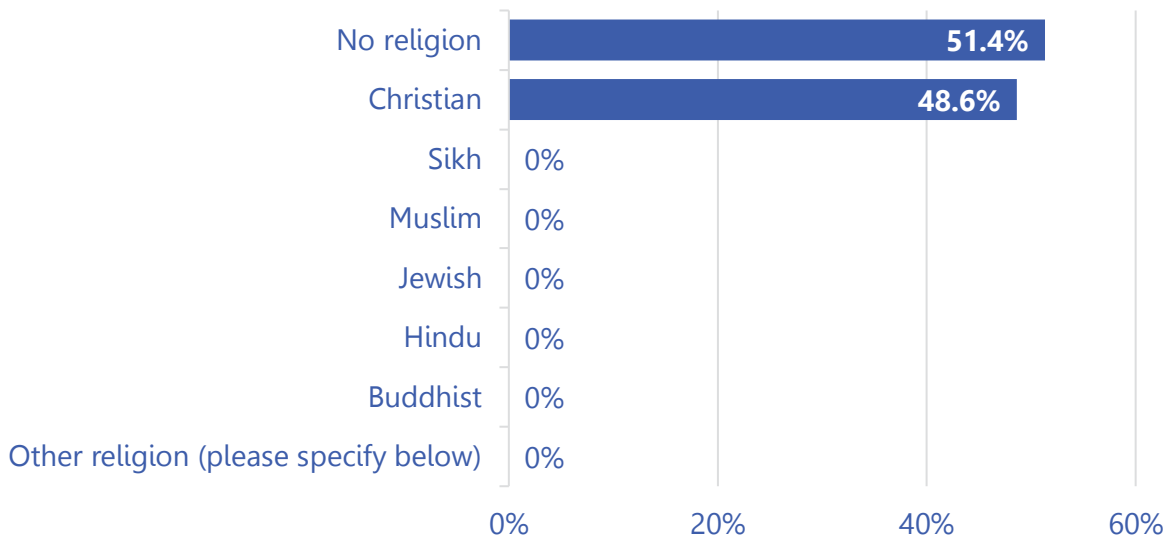
**Community background**

This was answered by 40 respondents (36.4%).



**Religious denomination**

This was answered by 37 respondents (33.6%).



**Ethnicity**

This was answered by 38 respondents (34.5%).

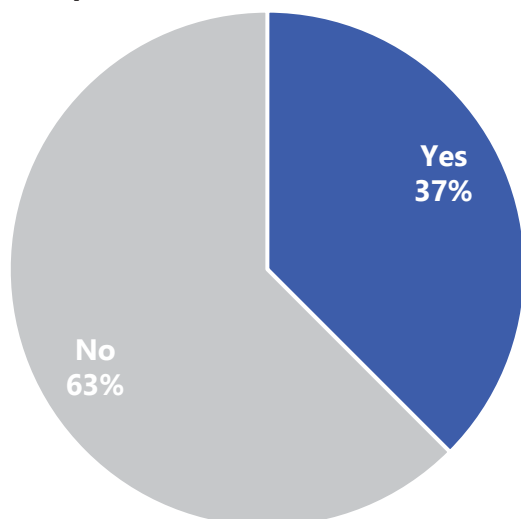
	Count	Percentage
White	37	97.4%
Mixed Ethnic group (please specify below)	1	2.6%
<b>Total</b>	<b>38</b>	

## Appendix C

### Dependents

This was answered by 40 respondents (36.4%).

**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	11	64.7%
A person with a disability	3	17.6%
An elderly person	2	11.8%
Other (please specify)	1	5.9%
<b>Total</b>	<b>17</b>	

### Sexual Orientation

This was answered by 38 respondents (34.5%).

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

	Count	Percentage
The same sex	4	10.5%
Different sex	25	65.8%
Both sexes	0	0.0%
Questioning / not sure	0	0.0%
Prefer not to say	9	23.7%
Other (please specify)	0	0.0%
<b>Total</b>	<b>38</b>	



## Appendix D1: Housing Baseline



## Appendix D2: Employment Baseline



## Appendix D3: Transport Baseline



## Appendix D4: Market Impact Report





## Appendix D5: Technical Response to Housing Comments



## Appendix D6: Regional Growth Comparison



## Appendix D7: Infrastructure Baseline



## List of Abbreviations

<b>ACMD</b>	Areas of Constraint on Mineral Development
<b>ANBC</b>	Antrim and Newtownabbey Borough Council
<b>ANDBC</b>	Ards and North Down Borough Council
<b>BA</b>	Belfast Agenda
<b>BCC</b>	Belfast City Council
<b>BMA</b>	Belfast Metropolitan Area
<b>BMAP</b>	Belfast Metropolitan Area Plan
<b>BMTP</b>	Belfast Metropolitan Transport Plan
<b>BOSS</b>	Belfast Open Space Strategy
<b>BREEAM</b>	Building Research Establishment Environmental Assessment Method
<b>CEF</b>	Construction Employers Federation
<b>CIH</b>	Chartered Institute of Housing
<b>DAERA</b>	Department of Agriculture, Environment and Rural Affairs
<b>DCAN</b>	Development Control Advice Note
<b>DCF</b>	Developer Contributions Framework
<b>DfC</b>	Department for Communities
<b>DfE</b>	Department for the Economy
<b>DfI</b>	Department for Infrastructure
<b>dHRA</b>	draft Habitats Regulations Assessment
<b>DM</b>	Development Management
<b>DoE</b>	Department of the Environment
<b>dPFG</b>	draft Programme for Government
<b>dPS</b>	Draft Plan Strategy
<b>DSD</b>	Department for Social Development
<b>EH</b>	Environmental Health
<b>EIA</b>	Environmental Impact Assessment
<b>EQIA</b>	Equality Impact Assessment
<b>FDI</b>	Foreign Direct Investment
<b>GBIP</b>	Green and Blue Infrastructure Plan
<b>HA</b>	Housing Association

<b>HAG</b>	Housing Association Guide
<b>HELAA</b>	Housing and Employment Land Availability Assessments
<b>HGI</b>	Housing Growth Indicator
<b>HIA</b>	Health Impact Assessment
<b>HMA</b>	Housing Management Area
<b>HMOs</b>	Houses in Multiple Occupation
<b>HNA</b>	Housing Needs Assessment
<b>HRA</b>	Habitat Regulations Assessment
<b>KSR</b>	Key Site Requirements
<b>LDP</b>	Local Development Plan
<b>LPP</b>	Local Policies Plan
<b>MASWG</b>	Metropolitan Area Spatial Working Group
<b>MEL</b>	Major employment Location
<b>NIEA</b>	Northern Ireland Environment Agency
<b>NIFHA</b>	Northern Ireland Federation of Housing Associations
<b>NIHE</b>	Northern Ireland Housing Executive
<b>NISRA</b>	Northern Ireland Statistics and Research Agency
<b>PAN</b>	Proposal of Application Notice
<b>PBMSA</b>	Purpose Built Managed Student Accommodation
<b>PD</b>	Permitted Development
<b>POP</b>	Preferred Options Paper
<b>PPP</b>	Plan, Policy and Programme Review
<b>PPS</b>	Planning Policy Statement
<b>PRS</b>	Private Rented Sector
<b>PS</b>	Plan Strategy
<b>RDS</b>	Regional Development Strategy
<b>RSTN</b>	Regional Strategic Transport Network
<b>RSUA</b>	Royal Society of Ulster Architects
<b>SA</b>	Sustainability Appraisal
<b>SA/SEA</b>	Sustainability Appraisal incorporating Strategic Environmental Assessment
<b>SAC</b>	Special Areas of Conservation
<b>SCI</b>	Statement of Community Involvement



<b>SEA</b>	Strategic Environmental Assessment
<b>SEL</b>	Strategic Employment Location
<b>SFG</b>	Spatial Framework Guidance
<b>SPA</b>	Special Protection Areas
<b>SPPS</b>	Strategic Planning Policy Statement for Northern Ireland
<b>STL</b>	Short Term Let
<b>SuDS</b>	Sustainable Urban Drainage Systems
<b>TBUC</b>	Together: Building a United Community
<b>TQ</b>	Titanic Quarter
<b>UCS</b>	Urban Capacity Study
<b>UUEPC</b>	Ulster University's Economic Policy Centre



## Belfast Planning Service

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