



# Belfast

## Local Development Plan

### Supplementary Planning Guidance

Consultation Representations Report  
May 2023

[www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)



**Belfast**  
City Council





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# Introduction



## Introduction

### 1.1 Purpose of this report

1.1.1 This report details the engagement process undertaken in preparing and consulting on the proposed suite of Supplementary Planning Guidance (SPG)<sup>1</sup>. 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 in representations made in respect of the SPG consultation. The detailed representations received are publicly available and can be read alongside this report.

### 1.2 Background to the consultation

1.2.1. In August 2019, as part of the process of developing the new Local Development Plan (LDP) for Belfast, the Council formally submitted the draft Plan Strategy (dPS) to the Department of Infrastructure (DfI). The DfI subsequently appointed the Planning Appeals Commission (PAC) to conduct an Independent Examination (IE) of the dPS, which was held over two sessions between November 2020 and March 2021.

1.2.2. The PAC made its recommendations under section 10(8) of the Planning Act (Northern Ireland) 2011 (hereafter "the Act") and presented these as recommended amendments as part of its Report to the DfI in September 2021 in which it concluded the dPS was, subject to modifications, "sound".

1.2.3. In February 2022, following consideration of the PAC Report, the DfI in exercise of the powers conferred on it by section 12(1)(b) of the Act, issued a Direction to the Council. This directed the Council to address the requirements set out in the Schedule 1 of the Direction, along with any necessary engagement and consultation, prior to formal adoption of the Plan Strategy (PS).

1.2.4. In progressing work towards the adoption of the dPS the council consulted on the modifications to the dPS and on the proposed suite of SPG that will support the implementation of the adopted PS.

1.2.5. The development of SPG ran parallel with the dPS process but it was not possible to carry out public consultation until the policies had been subject to Independent Examination. The council produced and consulted on 17 SPGs covering the following topics:

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<sup>1</sup> SPG represents non-statutory planning guidance, intended to be read in conjunction with the existing planning policy framework, most notably the Strategic Planning Policy Statement (SPPS) for Northern Ireland and the Belfast Local Development Plan Strategy. SPG are intended for use by developers, the public and by planning officers to support the assessment and delivery of planning proposals.

- Advertising and Signage
- Affordable housing and housing mix
- Development viability
- Evening and night-time Economy
- Loss of zoned employment land
- Masterplanning approach for major development
- Placemaking and urban design
- Planning and flood risk
- Residential design
- Residential extensions and alterations
- Retail and main town centre uses
- Sensitive uses
- Sustainable Drainage Systems (SuDS)
- Tall buildings
- Transportation
- Trees & development
- Waste infrastructure

1.2.6. Links to each SPG can be found on the council's website:

[www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)

### 1.3 Overview of the consultation process

1.3.1. The Council's Statement of Community Involvement sets out its policy for involving the community in the production of the LDP, describing who, how and when the community will be invited to participate in the different states of the LDP formulation. Section 6.1 of the Statement of Community Involvement informs that SPG will be published for consultation and comment prior to publication of the final draft, with comments received published on the Council's website.

#### Engagement

- 1.3.2. The Council established a series of thematic workings groups to bring together key stakeholders to support formulation of the SPG. The working groups involved representation from key stakeholders, such as statutory partners and representative bodies. The groups provided a forum to gather information, views, and details in order to maximise collaboration and reach consensus on the draft documents.
- 1.3.3. A series of 10 meetings were also held during the formal consultation period on the SPG. The meetings, occurring between 07 July 2022 and 29 July 2022, sought to refamiliarise working group members with the content of the SPGs and present a broad overview to relevant Council officers and representatives.

## Introduction

### Consultation

- 1.3.4. As part of the consultation process a public notice relating to the SPG was issued during week commencing 09 May 2022, appearing in the following newspapers:
- Irish News
  - Belfast Telegraph
  - News Letter
  - Andersonstown News
  - Belfast Gazette
- 1.3.5. The formal consultation period commenced on Thursday 12 May 2022 and closed on Thursday 04 August 2022 at 5pm. An online consultation survey (and accompanying hardcopy survey form) was made available during this period for the receipt of representations.
- 1.3.6. The survey was accompanied by full range of consultation materials, made available to view and download online via the Council's website and were available for inspection at the main reception in Belfast City Hall during normal opening hours.
- 1.3.7. All of the consultation materials remain available for inspection on the LDP pages of the Council's website.





# Overview of Responses



### 2.1 Summary of responses received

- 2.1.1 A total of 31 representations were received during the consultation period for the draft SPG. One further submission was received after the 5pm consultation closure and was not accepted as a valid response. The respondents are broadly categorised as individual (3), non-departmental public body (1), private sector (10), professional body (2), statutory (8)<sup>2</sup>, and third sector (7). They are listed at Appendix A, with acknowledgement of the SPG documents they responded to, and a copy of their responses are available to view on the Council's website.
- 2.1.2 There were a range of positive comments received about the SPGs in terms of their clarity and intent and there were proposals for a number of minor changes across all of the SPGs, many of which have been incorporated into the final documents. A number of more significant changes were made in respect of the approach to implementing Social and Affordable Housing policies including issues of viability. There was general support for many of the design principles and the positive approach towards sustainable development and environmental enhancement through SuDS and biodiversity and the commitment to supporting Green and Blue networks. Some comments were received raising concerns that the guidance was straying into the realms of planning policy particularly in relation to the Loss of Employment Land and so some minor adjustments have been made to the guidance to clarify any potential ambiguity.

### 2.2 Approach to analysis of responses

- 2.2.1 The consultation response form was designed to provide an appropriate format for accurately capturing respondent views in relation to the SPGs. However, a large proportion of respondents chose not to utilise the form when submitting their response. Therefore, to aid analysis of the responses, the Council undertook an initial review of each submission to ascertain to which SPG(s) the responses related.
- 2.2.2 In the following sections of this report the main issues raised in relation to each SPG have been summarised and responded to, including the Council's justification where revisions<sup>3</sup> have been made or otherwise. Minor points raised in regard to peripheral matters such as typographical errors or syntax are not included in the response summaries. However, points raised in regard to such matters have been attended to in revisions to the SPG.
- 2.2.3 Where respondents had not used the online consultation survey or provided hardcopy alternative, instead responding via individual format, it was not clear

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<sup>2</sup> Figures in brackets denote the number of respondents within each category classification.

<sup>3</sup> Some revisions have been made following internal feedback, and although not attributed to any individual respondent, an account of these changes is included in respective tables.

whether a respondent wished that their response be published anonymously. Where necessary, respondents were contacted to provide clarification on publishing preferences.

# Council response to key issues raised



## Affordable housing and housing mix

### Summary of Responses

Thirteen respondents made representations in respect of the Affordable Housing and Housing Mix SPG. Of the comments submitted:

- There was **support** for policies HOU5 and HOU6, as well as the intermediate rent product and housing mix guidance;
- Thirteen comments sought further clarity in the **definitions** of certain terms used throughout the SPG;
- Several related to the **roles** of different organisations in regard to topics such as social housing provision and intermediate rent developments;
- Over thirty comments related to affordable housing **products** that were highlighted in the SPG. Of these comments, ten directly related to the **intermediate rent** product, including viability issues;
- Twenty-eight comments related to **design** issues, in particular the concept of **tenure-blind** development and “**pepper-potting**”, including issues surrounding the funding and management arising from these concepts;
- A large amount highlighted particular issues for **Build to Rent** development, highlighting that Belfast is behind other cities and that **Discount Market Rent (DMR)** is the only product that would work for affordable housing delivery;
- Over twenty requested further guidance surrounding **suitable alternatives** and the concepts of offsite development and commuted sums. There were nineteen comments relating directly to **commuted sums**, questioning how they should be administered and spent;
- Thirty comments related to **viability** concerns, for example how affordable housing requirements in BTR developments could impact viability or how the SPG may stifle investment;
- Four comments targeted **Section 76 (s76) Agreements**, including requests for the inclusion of model s76 agreements within the SPG;
- Fifty-eight comments related in some way to the **Colliers’ Market Impact Report** published as part of the DPS evidence base (SD006D), suggesting that key recommendations have not been addressed to date;
- Some **welcomed the SPG** and highlighted how it can provide clarity for various stakeholders;
- Some suggested a **delay to implementation** as the market should be more established with more affordable products before the introduction of the policy;
- Issues were raised around **threshold avoidance**, i.e. dividing larger sites to circumvent affordable housing policy requirements; and
- Some respondents raised very specific issues, such as support for Small and Medium Enterprises (SMEs), formatting queries and suggested wording updates.

## Council response to key issues raised

### Responses Received

Reference	Respondent
SPG-R-02	Anonymous - Respondent No 2
SPG-R-07	PPR Project
SPG-R-09	Chartered Institute of Housing
SPG-R-12	Co-Ownership Housing Association
SPG-R-13	Bywater Properties, South Bank Square, Wirefox, MRP

Reference	Respondent
SPG-R-15	NIFHA
SPG-R-18	DfC - Affordable Rent Branch
SPG-R-21	NIHE
SPG-R-22	Clanmil Housing Group
SPG-R-24	Belfast Harbour
SPG-R-25	Titanic Quarter Ltd
SPG-R-26	Lacuna Developments
SPG-R-28	Swinford Sirocco Ltd

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

Main Issue	Council Response
<b>Support</b>	
Support shown for ambitious policies in dPS, most notably HOU5, which will help in addressing housing stress.	Support for policy approach welcome.
Building more houses alone will not solve the chronic level of housing need in areas of high demand. Rather, the building of appropriate houses, in terms of house types and sizes will be crucial to this. This is welcomed as part of Policy HOU6.	Support for policy approach welcome.
"Rethinking social housing" research is in support of mixed tenure development, as set out in Policy HOU5.	Research supporting the Council's policy direction is welcome.
A phasing plan will be important to agreed when the affordable housing will be provided relative to market housing.	Support for provisions outlined in Section 5.3.4 relating to the use of s76 agreements to achieve appropriate phasing is welcome.
<b>Definitions</b>	
The SPG should be amended to remove the need for affordable housing to comply with the Department for Communities (DfC) definition of affordable housing and to instead reference to the SPPS definition.	The SPG refers to the latest definition of "Affordable Housing" which was updated by the Department for Communities (DfC) on 1 April 2021. For the purposes of planning and the SPPS, this new definition now applies, meaning that for proposals to accord with the affordable housing policy in the Plan Strategy, affordable housing products must meet this definition. We have amended Section 1.2 of the SPG to make this more explicit, by removing reference to the previous SPPS definition. We have also consequently updated paragraph 3.3.1 to also reflect this change.

Main Issue	Council Response
<p>The wording of paragraph 3.4.1 should be adjusted to refer to a “need” for social housing and a “demand” for intermediate housing. Wording should also be changed regarding how NIHE determines social/intermediate housing need/demand.</p>	<p>We accept this correction is required for clarification and have amended numerous references throughout the document accordingly to more appropriately address ‘need’ and ‘demand’.</p>
<p>Clarification is required on what is meant by “larger areas of mono-tenure social housing”, or how “small scale” social housing schemes will be assessed.</p>	<p>It is not possible to precisely define a 'large area' of mono-tenure social housing as each case is likely to differ depending on the context. One of the overall aims of mixed tenure development, as outlined in paragraph 1.1.3 is to ensure that the development, is that development is not going to exacerbate issues associated with areas of mono-tenure social housing. The size at which a development is likely to exacerbate existing issues is clearly dependent on the site-specific context and so is best assessed on a case-by-case basis.</p> <p>Paragraph 4.4.11 sought to provide some additional clarification in relation to 'small scale' developments noting that they will be assessed on a case-by-case basis by balancing a number of factors, including the level of social housing need, the tenure mix in the wider area and whether a scheme is proposed as 'shared housing'. The second of these criteria specifically lists the reason for assessing wider tenure characteristics of an area as seeking "to minimise large areas of single tenure social housing."</p> <p>Upon reflection, the factors noted above from Section 4.4.11 are considered relevant when assessing any application for single tenure social housing development irrespective of size. We have therefore amended the introduction to this list in Paragraph 4.4.11 to clarify that the criteria are applicable in all cases where single tenure social housing is proposed.</p> <p>We are now proposing to include a formal definition of 'small-scale' of 12 units. This aligns with the Council's Scheme of Delegation, which is deliberately set at a level which ensures</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>development that is likely to cause concerns are considered by elected representatives, rather than delegated to Officers. The figure used within the Scheme therefore provides a useful proxy for residential developments that are likely to cause fewer issues.</p>
<p><b>Roles</b></p>	
<p><b>NIHE</b> NIHE should be recognised as a social housing provider in 3.3.4, as per 1.3.3.</p>	<p>The Council accept that NIHE is an important provider of social housing through the management of its existing stock of over 84,500 social housing units. However, although we are aware of NIHE aspirations to be able to develop new social housing in the future, as part of a wider restructuring of NIHE, but NIHE are not currently able to build new social housing. We have therefore not recognised NIHE as a delivery body for social housing at present, but can update the SPG in the future once it's clear what NIHE role may be in terms of building new social housing.</p> <p>However, in line with this context, we have updated the figure relating to the number social houses NIHE lets out in paragraph 1.3.3, and have added NIHE as a current provider of social rented housing in paragraph 3.3.4.</p>
<p>NIHE has a statutory role in determining housing need across all tenures and, until recently, published information has been largely limited to an assessment of social housing need.</p>	<p>Paragraph 1.3.3 of the SPG recognises that NIHE is the strategic housing authority responsible for the examination and assessment of housing need. At Paragraph 3.4.1, it recognises that "NIHE will provide up to date advice on the level of affordable housing need/demand on a case-by-case basis via a RHA." In the case of intermediate housing need, paragraph 3.4.3 then specifies that "The exact approach [to assessing demand] will be varied for each intermediate housing product, based upon eligibility criteria for the specific product."</p> <p>The Council therefore acknowledge the important role that NIHE have in terms of providing information on the range of affordable housing requirements and look forward to the continued</p>



## Council response to key issues raised

Main Issue	Council Response
	<p>partnership working to ensure the required information is available as required.</p> <p>The SPG also recognises the important role of NIHE as a statutory consultee in the planning process, which will also result in formal consultation with NIHE as part of both the PAD process and when determining planning applications.</p>
<p>NIHE will advise Registered Housing Associations (RHAs) or the Council regarding need and demand, but will not provide formal advice to a developer directly and may be reluctant to provide general advice to a developer.</p>	<p>The Council's understand that the NIHE will only provide advice in relation to housing need to a RHA as part of a proposal that includes social housing, or via the Council as part of the statutory consultation process in relation to planning applications or PADs. Conversely, we recognise that NIHE will not provide advice directly to a private developer, other than through a RHA or via routinely published Housing Needs Assessments or Strategic Housing Market Analysis.</p> <p>NIHE's role in providing advice re: housing need via RHAs, or the Council as a Statutory consultee in the planning process, is already acknowledged within the SPG (see Section 3.4). The Council have also amended the SPG in a number of other places to provide greater clarity, including an amendment to the 'What do I need to do?' box on p16, as well as in para 3.4.1 and at requirement 5 of Appendix 5.</p>
<p>NIHE should have primacy in decision making about the mix of affordable housing.</p>	<p>The Council will take advice in relation to housing need from the NIHE, as the strategic housing authority, and will give the advice appropriate weight, alongside all other material considerations when determining planning applications.</p> <p>However, the Council still remains the statutory planning authority and so the final decision will be for the Council in relation to planning applications.</p>
<p>NIHE advice provided prior to submission of an application should be relied upon to form the basis of decisions.</p>	<p>An additional sentence has been added to end of paragraph 3.4.8 to advise that NIHE should be consulted to ensure that advice provided prior to an application can be relied upon by all parties.</p>

## Council response to key issues raised

Main Issue	Council Response
Reference to HMAs should be updated to reference Strategic Housing Market Analysis (SHMA).	All references to Housing Market Assessments (HMAs) throughout the document have been updated as suggested to refer to Strategic Housing Market Analysis (SHMA).
The definition of sustainability and NIHE's role in determining if the 20% affordable housing provision is sustainable in 5.2.4 is not clear.	<p>Paragraph 5.2.4 states that 'sustainability' refers to a development being "rendered unfeasible as a result of wider circumstances" as opposed to being constrained by financial factors (i.e. viability). Paragraph 5.2.5 then outlines a number of situations where this may arise, but paragraph 5.2.6 confirms that this should be "extremely rare" and will therefore only arise in the "most exceptional of cases".</p> <p>The reference to "consultation with NIHE" in paragraph 5.2.7 refers to the routine consultation with NIHE in relation to proposals for affordable housing as part of the planning process and therefore does not require any further clarification. In cases where NIHE may identify difficulties in delivering a particular scheme, we would expect this to be reported to the Council through an appropriate consultation response and it may be appropriate for NIHE to also provide advice in relation to alternatives in order of the preferences outlined in the box below paragraph 5.2.11.</p>
<p><b>Department for Communities (DfC)</b> As referred to in 1.3.7, DfC is the regulator of RHAs in NI.</p>	Although paragraph 1.3.7 already acknowledges that RHAs are regulated by DfC, this is not explicit within the description of DfC's role. We have therefore amended paragraph 1.3.6 to reference this directly in relation to DfC.
<p><b>RHAs</b> In October 2020 the Office for National Statistics concluded that RHAs in NI are private.</p>	In line with comments, we have amended paragraph 1.3.7 to acknowledge that RHAs are classified as 'private' sector.
The role of RHAs in developing / letting intermediate rent is unknown, so they may not need to be consulted.	There is reference to engagement with NIHE, DfC and/or a RHA in Paragraph 1.3.9, but the use of the term 'and/or' highlights that not all will need to be used in all cases. We don't therefore believe any further changes are required to the SPG.

Main Issue	Council Response
<p><b>Private Sector</b></p> <p>Belfast Harbour wants to work with the Council to ensure LDP/SPG enables delivery of investment</p>	<p>The Council recognise the important role the Belfast Harbour plays in relation to Belfast and Northern Ireland's economic growth. We are committed to working with the Harbour Commissioners to ensure the economic potential is maximised for the City.</p>
<p><b>Products</b></p>	
<p><b>New Products</b></p> <p>The Council should continue to engage with NIHE and DfC as preparations continue towards the introduction of new products including Intermediate Rent.</p>	<p>The Council have worked closely with DfC, NIHE and other key stakeholders throughout the preparation of the LDP Plan Strategy and SPG to ensure that the appropriate arrangements are in place to ensure the affordable housing policy requirements can be delivered.</p> <p>For example, with the emerging Intermediate Rent product, the Council is an active participant in a DfC-led project board that oversees the research and policy development work jointly with the DfC, NIHE, NIFHA and Derry and Strabane District Council (with research recognising that such a product is, at least initially, only likely to be viable within the two larger conurbations of NI). We will therefore continue to engage with DfC, NIHE and other key stakeholders in relation to this and other delivery/implementation issues to ensure that the affordable housing policy can be implemented effectively.</p>
<p><b>Social rented housing</b></p> <p>Objective need and social housing should be prioritised over intermediate housing demand.</p>	<p>Regional planning policy requires the Council to make provision for all forms of housing need, including affordable housing. Affordable housing does not only consist of social housing, but also intermediate housing for sale and intermediate housing for rent. Policy HOU5 is therefore written to address these requirements. Whilst acknowledging that decisions should take account of up to data analysis of demand, including housing stress and housing need, the Policy does not provide any hierarchy of tenures. The SPG cannot therefore give preference to one form of affordable housing over another.</p>

## Council response to key issues raised

Main Issue	Council Response
<p><b>Intermediate Housing for Sale</b></p> <p>The definition of “intermediate housing for sale” describes a shared ownership product. There are other intermediate housing for sale products that could be introduced in future, such as discounted sales.</p>	<p>Section 3.3.6 has been amended to draw a distinction between shared ownership products offered by Co-ownership HA with the help of public sector subsidy, and other Discount Market Sale (DMS) products that can be delivered directly by the private sector or other RHAs without public sector subsidy.</p>
<p>SPG should highlight the new co-own for over 55s product, and give detail of what it entails.</p>	<p>We have added the new Co-Own for over 55s product, with an associated definition and an updated definition of co-ownership below paragraph 3.3.7 to reflect this.</p>
<p>In the section on Rent to Own the individual will pay a market rent and receives a rebate of part of the market rent paid back at the end to be used as a deposit.</p>	<p>We have added this new product, with an associated definition below paragraph 3.3.7 to reflect this.</p>
<p>In paragraph 3.37 reference is made to the Co-Ownership property value limit. The current limit is £175,000. This is reviewed by the Department for Communities from time to time to ensure it remains aligned with the housing market.</p>	<p>The exact criteria associated with the various co-ownership products, in terms of applicant eligibility and property size and value criteria, have been removed throughout the document and a footnote added to paragraph 3.3.7 to refer readers to the Co-ownership website for the latest criteria relating to each product. This better addresses the variable nature of some of the criteria, including the property value limit, which we understand is now set at £195,000.</p>
<p>Level of demand for intermediate housing for sale is unknowable and dependent on market conditions in a particular area</p>	<p>The Council understand that Co-ownership HA are not able to commit to shared ownership houses prior to construction, given there is no list of potential customers to establish a formal need. However, conversely it is also true that any private residential property for sale/rent could be offered as an Intermediate housing unit following construction, which is of course dependent on economic and market conditions.</p> <p>Research undertaken by Colliers International for the Council in 2019 (SD006D) noted that there is "a continuing need for affordable homeownership" in Belfast and that Co-ownership housing "has been vital to suburban developments" particularly during the more</p>

Main Issue	Council Response
	<p>difficult economic conditions following the global financial crash in 2009.</p> <p>It is therefore reasonable to assume that shared ownership housing is likely to be attractive in some cases and we understand that Co-ownership HA are willing to jointly market appropriate properties for shared ownership sale under one of their programmes. However, we also understand that this will not always result in the sale of a particular property under the intermediate housing definition, and so recognise the need for appropriate fall-back positions dependent on the circumstances.</p> <p>This could include the conversion of homes to social housing, as suggested by some respondents, but will only be possible where units would help meet the identified need in the locality in terms of size and type and if they are constructed to appropriate standards, including size and value limits, etc. This would also require a RHA to be willing and able to purchase such units. Whilst this is probably the preferable solution, conversion to social housing may not therefore always be possible and further fall-back options may also be required. Whilst Section 5.2 of the SPG already identifies off-site provision of social housing or Commuted Sums as potential alternatives, there perhaps still remains scope for further products, as identified by a number of respondents.</p> <p>The Council have therefore recognised the role that both Discount Market Rent (DMR) and Discount Market Sale (DMS) could play as potential forms of affordable housing, within the scope of the NI definition, where other more traditional provision is not possible. These affordable 'products' would still be demand driven and subject to similar eligibility criteria as subsidised forms of affordable housing, but could be delivered directly by the private sector or RHAs without any public sector involvement. We have</p>

## Council response to key issues raised

Main Issue	Council Response
	therefore amended Section 3.3 of the SPG in a number of places to recognise the use of these products and have expanded guidance in Chapter 5 to include reference to fall-back options and how these will be secured as part of a s76 Planning Agreement.
<p><b>Intermediate housing for rent</b></p> <p>The inclusion of reference to an intermediate rent product is welcomed as it will meet the needs of more people.</p>	Support welcome.
<p>Given that DfC is unable to indicate when details on the products that would qualify as intermediate housing, or the policy framework would be available it is premature to bring forward an SPG which would seek to deliver intermediate housing for rent.</p>	<p>The Council are content that the policy can be delivered practically, including the emerging Intermediate Rent product. Although there is not currently an Intermediate Rent Operator in place to deliver a Subsidised Intermediate Rent (SID) product with Government support, DfC published their Intermediate Rent Policy and associated Design Standards on 30 March 2023, which provide the broad parameters to allow the SID product to be considered as an option, as well as for the inclusion of a Discount Market Rent (DMR) product without public subsidy. The SPG has therefore been updated to reflect this development and the inclusion of these products is therefore now further justified. However, we continue to acknowledge that not all details are fully available for the SIR product and note that the SPG can be more easily updated than the Plan Strategy as and when new product details become available.</p>
<p>Intermediate rent should be driven by local demand and not used to circumvent the provision of social housing.</p>	<p>The Council accept that intermediate housing for both sale and rent are largely demand driven, so are dependent on appropriate households wishing to buy/rent a property in the particular location and of the size and typed desired. However, it is possible to use imperative data relating to the district's demographics, average house/rental prices and average incomes, to determine the number of people likely to be both eligible and in need of intermediate housing products over a given time period. This usually forms part of Strategic Housing Market Analysis (SHMAs) undertaken periodically by the NI</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Housing Executive (NIHE). For Belfast, this identifies a total need for a District, but without any geographical breakdown within the District.</p> <p>In relation to agreeing the appropriate mix of affordable housing, Section 3.4.1 of the SPG notes that "NIHE will advise the Council on the appropriate mix between these tenures as part of the affordable housing requirement." However, we have also strengthened the existing provisions in a number of places, most notably Section 3.3.5 and 5.2 to ensure that "where there is a need for social housing identified by NIHE, proposals should incorporate an appropriate mix of social rented housing in terms of size and type of unit to meet the identified need." And that "proposals should also seek to provide other forms of affordable housing as required to contribute to balanced and sustainable communities." The SPG also continues to acknowledge that there may be some circumstances where the provision of social housing is not possible. In such cases, other forms of affordable housing will still be required in accordance with the hierarchy of suitable alternatives outlined in Section 5.2.</p>
<p>Housing Market Analysis should be used to avoid building affordable homes where they are not needed.</p>	<p>Support for this acknowledgment within Section 3.4.1 welcome.</p>
<p>Existing affordable housing relies on government subsidy, including the emerging Intermediate rent product. If other suitable alternatives are acceptable, such as affordable private rent (DMR), this would result in a saving on the public purse.</p>	<p>The Council accept that the provision of affordable housing without the use of public subsidy provides a saving to the public purse.</p>
<p>Alternative products are needed such as affordable private rent / DMR.</p>	<p>The Council have now included Discount Market Rent (DMR) housing as a new product, based on DfCs new Intermediate Rent Policy criteria, and Discount Market Sale (DMS) housing, based on the criteria for shared ownership products, both of which could be delivered directly by a private sector developer, without any public subsidy. This helps broaden the range of products available and provides additional flexibility, catering for</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>circumstances where other products may not be appropriate.</p>
<p>HAs can't access funding for Intermediate Rent product.</p>	<p>DfC have confirmed that although only a DfC appointed Intermediate Rent Operator will be able to access financial assistance from the government, other landlords are able to deliver an intermediate rent product without public sector support when adhering to the Intermediate Rent Policy provisions.</p> <p>This raises the prospect of a private landlord, investor or RHA being able to deliver a discounted rental unit to certain eligible households directly. This aligns with the broad definition of a Discount Market Rent (DMR) product used in other jurisdictions, which was proposed as an alternative by a number of respondents.</p>
<p><b>Design</b></p>	
<p>HAG Design Standards only apply to social housing and not intermediate homes.</p>	<p>The SPG refers to the HAG design standards being applicable to 'social housing' but maybe does not clarify that they are only applicable to social housing. We have therefore made a number of minor alterations throughout the document to make this more explicit.</p> <p>Likewise, although the document generally refers to the 'HAG standards'. We have made a number of amendments to clarify that the requirements referenced are part of the 'HAG Design Standards' as opposed to other HAG requirements.</p>
<p>RHAs have a concern that the private sector will cater to the easily managed 2-bedroom accommodation leaving the more contentious 1-bedroom accommodation for the RHA to deliver.</p>	<p>Section 4.2 makes clear that the size of affordable housing units will need to be determined, in consultation with NIHE and an RHA, to ensure that the provision takes account of up-to-date demand and prevailing housing need. The social housing will therefore have to address the need identified and shouldn't be left as the smallest units.</p>
<p>We note the need for smaller homes in paragraph 4.3.2. Intermediate housing is however driven by what people want rather than need and Co-Ownership's experience is that our customers generally want three bed homes.</p>	<p>This is acknowledged and an additional sentence has been added within paragraph 4.4.10 to flag up the need to consider product size and value requirements when proposing units for intermediate affordable housing.</p>



Main Issue	Council Response
<p><b>Wheelchair housing</b> RHA's will build wheelchair standard accommodation on a speculative basis without an Occupational Therapist report and therefore all are not bespoke.</p>	<p>We recognise that not all wheelchair social housing is built bespoke for a named tenant on the basis of an occupational therapist report. As detailed in the HAG, a proportion of standard wheelchair housing is also provided to aid independent living for people with physical disabilities and those who also need a wheelchair for day-to-day mobility and require the larger areas and circulation areas afforded by this accommodation type. This is 'wheelchair adaptable' housing rather than full wheelchair housing.</p> <p>In addition, RHAs will on occasion provide bespoke wheelchair houses, where a named tenant is identified who requires specialist adaptations. This would be based on advice from an occupational therapist. To make this clearer, we have amended the text under the Adaptable and accessible accommodation bullet point below paragraph 3.5.12 accordingly.</p>
<p>Policy HOU7 states that 10% of developments of 10 units or more will be required to be developed to 'wheelchair adaptable' standard. It would be helpful if the SPG provided clarity on whether the Council will enforce this requirement in all cases.</p>	<p>The SPG notes under other design considerations within Section 3.5 that all housing proposals are required to take account of Policy HOU7: Adaptable and accessible accommodation. It is important to note that this is a requirement for 'wheelchair adaptable' rather than full wheelchair houses. The Affordable Housing SPG acknowledges these requirements directly, alongside wider design considerations and directs readers towards the more detailed guidance contained within the separate 'Residential design (including adaptable and accessible accommodation)' SPG, which includes detailed guidance on meeting the wheelchair adaptable criteria.</p> <p>This Affordable Housing SPG also recognises that social housing is already built to a set of Lifetime Home Standards and that, where a need is identified, may also include full wheelchair housing. Social housing will therefore always</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>meet the adaptable homes criteria required by HOU7 and is also likely to meet the wheelchair adaptable requirements through wheelchair adaptable units and bespoke wheelchair housing. However, 10% of the social housing will not be the same as 20% of the overall development and the SPG notes that the 10% "wheelchair adaptable units should be provided within both the affordable and private elements of the scheme". This is a policy requirement and off-site provision or commuted sums in lieu of wheelchair adaptable provisions in private/intermediate housing are not considered appropriate means to address this.</p>
<p><b>Pepper-potting/Tenure-blind</b> Some of the examples of pepper-potting are not appropriate in most city centre/apartment developments. For example, Fig 3.5 Options 2, 3 &amp; 4 are not considered fundable by institutional investors and segregated accesses are not acceptable for mixed tenure schemes. In the absence of a DMR solution, BTR developers can only bring forward projects of scale on larger sites on a block-by-block basis.</p>	<p>Policy HOU5 within the Plan Strategy requires that accommodation is "provided as an integral part of mixed tenure development, integrated with general needs housing and not readily distinguishable in terms of external design, materials and finishes". Paragraph 7.1.36 then expands upon this, introducing the concepts of 'pepper-potting' and 'tenure blind' development. However, it acknowledges that in the case of apartment buildings some form of clustering may be appropriate.</p> <p>The SPG then sought to clarify and elucidate this, including through the provision of examples of how the policy requirements could be met in practice. However, this was not intended to show any form of hierarchy in the examples included and seems to require further refinement given the number of comments received regarding this.</p> <p>In relation to Figure 3.4 the responses received from the RHA sector confirm that pepper-potting is possible within traditional housing. However, the pepper potting or clustering of tenures within a single apartment block seems to be undeliverable in relation to social housing as a result of management and ownership requirements. However, whilst the same issues</p>

Main Issue	Council Response
	<p>may be apparent in relation to intermediate housing for sale (e.g. shared ownership), the same is not true of intermediate housing for rent.</p> <p>Where a whole apartment scheme is intended for the rental market, split management and ownership can be avoided through the provision of discount market rental units directly by the investor/owner. It would therefore be possible, and desirable in line with Policy HOU5 requirements, for mixed tenure development in this context to be 'pepper-potted' throughout a single block. Similarly, where an RHA is to own a block in its entirety, there should be no problem with the provision of social rented housing alongside intermediate rent/discount market housing. Therefore, similarly, there is no reason why this could not be fully pepper-potted also.</p> <p>To make this more explicit within the SPG, we have removed the images from Figure 3.5 that represent 'stair-by-stair' and 'floor-by-floor' clustering and added a new option that represents a mix of just two tenures within a single-ownership block. Option 1, 'block by block' is still considered a potential option, alongside caveats relating to integrated design and tenure blind development. We have also simplified the some of the other images to show a greater proportion of a single tenure, with other tenures pepper potted within. The titles of the various options have been updated to explain the options more clearly, and paragraphs 3.5.3-3.5.5 also have been updated.</p>
<p>Inclusion of tenure blindness welcomed to avoid any distinction being made between affordable housing and owner-occupied properties which would undermine efforts to create truly mixed developments.</p>	<p>Support welcome.</p>
<p>RHAs won't co-manage a building with a private BTR management company and are concerned about potential management issues in large apartment blocks.</p>	<p>We recognise that RHAs are independent bodies, each with their own arrangements for the management of their housing stock. However, we recognise that an RHA will require ownership of</p>

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Main Issue	Council Response
	<p>stock to be able to avail of public funding. We therefore acknowledge that this is likely to preclude an RHA from delivering publicly funded affordable housing within a BTR scheme.</p> <p>However, DfC have confirmed that an RHA may not be required for an Intermediate Rent product and that anyone could deliver an Intermediate Rent product without subsidy, which would allow private sector to deliver an affordable rent product directly within a BTR scheme. The SPG refers to this as Discount Market Rent (DMR).</p> <p>In terms of broader management issues, it is an individual decision for each RHA whether or not they are willing to take on the management of units in any given circumstance. However, there is nothing from a planning policy perspective that would prohibit such an RHA from managing units in a variety of circumstances, including large apartment blocks.</p>
<p>Service charges must be reasonable and there should be suitable management arrangements in all new build apartments.</p>	<p>We welcome support for this provision in section 3.5.5 and note that all new build apartments will require management arrangements to be agreed with Council via Management Plan in accordance with Policy RD1 (see also Residential Design (including adaptable and accessible accommodation) SPG).</p>
<p>There is an ongoing need to tackle the "Not in my back yard" sentiment.</p>	<p>Whilst it is common to receive objections to social housing on the basis of who future residents may be, paragraphs 3.5.1 and 3.5.2 make clear that when mixed tenure development is designed appropriately - affordable housing being appropriately integrated and pepper-potted with a tenure blind design – there is no evidence that such issues will occur.</p>
<p><b>Open space</b> A minimum amount of amenity space provision could be specified to ensure that a satisfactory amount is provided for all dwellings, similar to the 40 sqm recommended in "Creating Places". Social housing occupiers should have equal access</p>	<p>Although it is not appropriate for this SPG to refer to a minimum requirement for open space, which is appropriately addressed in other policies and documents, we can see merit in ensuring that the provision of open space does not undermine the principal of 'tenure' blind design. However,</p>

## Council response to key issues raised

Main Issue	Council Response
<p>as market housing occupiers to amenity space.</p>	<p>depending on the design of a specific development, it may not be feasible for every unit to contain the same amount of amenity space. However, the style and appearance should remain consistent, especially when viewed from the public road. As such, amendments have been made to paragraph 3.5.7.</p>
<p>All residents should have equal access to public open space and play areas in housing developments.</p>	<p>This is already recognised under the Plot Size bullet point below section 3.5.12. Support is welcome.</p>
<p><b>Build to Rent (BTR)</b></p>	
<p>Belfast has not witnessed any BTR development and is 2 or 3 years behind other locations.</p>	<p>The Council recognise that the BTR market in Belfast is still in its infancy and may require support to encourage early uptake. In 2020, CBRE completed research to provide the Strategic Investment Board and DfC with a sound evidence base to determine whether BTR development is suitable for the Northern Ireland housing market and if so, to explore the most cost-effective funding model(s) for delivery. The focus was on how government, including local government, can intervene to help facilitate delivery, particularly in relation to financing. It provided an overall analysis of the BTR market potential and any barriers to delivery that the public sector could help to address.</p> <p>It concluded that "Northern Ireland, and in particular, Belfast, is well positioned to secure investment into the Build to Rent sector, given the considerable investor interest already demonstrated, and the underlying demand dynamics." It also suggests that "When benchmarked against other regional city locations Belfast should already be witnessing development in the BTR sector..." but that this is being curtailed by other factors including viability.</p> <p>Policy HOU5 specifically makes provision for the consideration of 'suitable alternatives' on a case-by-case basis where it can be demonstrated that it is neither sustainable nor viable to deliver. The policy framework therefore has sufficient flexibility</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>to ensure that issues surrounding viability and delivery of full policy requirements should not place unreasonable burdens on BTR developments. The challenges for the viability of BTR development is acknowledged within Section 4.8 of the related Development Viability SPG and therefore don't need to be repeated within the Affordable Housing SPG.</p>
<p>Suggest the inclusion of specific guidance on Build to Rent developments which identifies that discounted market rent is an acceptable tool for affordable housing delivery.</p>	<p>As previously noted, the definition of Affordable Housing provides no reason that a Discount Market Rent (DMR), or other suitable product, could not be established within the parameters of the definition, where public subsidy is not required. In response to this and similar comments with regards to the need for a DMR product, the Council have updated the SPG to explicitly acknowledge Discount Market Rent (DMR) as a product that may be suitable in certain circumstances.</p> <p>Paragraph 3.3.9 already identifies the scope for intermediate housing for rent to form part of a build to rent scheme. The description of the new DMR product below paragraph 3.3.10 also notes that such a product "is considered particularly suitable for Build to Rent developments."</p> <p>Paragraph 3.3.11 explicitly states that "for Build to Rent (BTR) proposals, where ownership of the building is to be retained by a single investor, DMR will be accepted as the most appropriate affordable housing product."</p>
Alternatives	
<p>SPG fails to provide any greater clarity as to what "suitable alternatives" are.</p>	<p>The Council have amended Section 5.2 to provide further clarity in relation to the consideration of sustainability, viability and the consideration of suitable alternatives. This includes a hierarchy of affordable housing products, as well as a simplified list of suitable alternative delivery approaches, including off-site provision and commuted sums.</p> <p>This builds upon a number of amendments made to Section 3.3 also, which are intended to provide</p>

Main Issue	Council Response
	<p>greater clarity in relation to range of products available, including a broader range of Co-ownership (Intermediate Housing for Sale), Discount Market Sale (DMS) and Discount Market Rent (DMR) products, as well as the Subsidised Intermediate Rent (SIR) product.</p>
<p><b>Offsite Provision</b> Further guidance is required on offsite provision.</p>	<p>The Council consider the provision of off-site affordable housing should only be considered an alternative to on-site provision in exceptional circumstances. However, should such circumstances arise, the Council can see the merit in the provision of further guidance on how this can be achieved.</p> <p>We have therefore added additional text within Section 5.2 (paragraphs 5.2.17-5.2.21) of the SPG to provide an overview of the key considerations for assessing the suitability/necessity of off-site provision and the relationship, both in terms of location and delivery, of the housing on the main site and the 'donor' site(s). This includes the need for additionality in the provision of affordable housing relating to both sites and the requirement for a S76 Planning Agreement to link delivery across both sites.</p>
<p><b>Commuted Sums</b> Preference must first be given to the development of affordable housing, and only if viability cannot be met, should commuted sums be explored. Content with the calculations for commuted sums displayed in figure 5.2.20.</p>	<p>Paragraph 5.2.18 states that financial payments or commuted sums will only be considered in exceptional circumstances once more preferable options have been ruled out. The additional amendments to Section 5.2 makes this even more explicit. Support for this overall approach and the calculation of an appropriate amount is welcome.</p>
<p>The administration and spending of commuted sums requires detailed consideration. They should be encouraged where on-site provision of social housing can't be done and the SPG should explicitly state that commuted sums would be ring fenced for affordable housing.</p>	<p>The Council have been working in partnership with DfC and NIHE for a number of years now to establish the most appropriate delivery mechanisms. We are seeking to put in place a Memorandum of Understanding that will help govern how any commuted sums collected locally could be pooled to deliver affordable housing locally. This is likely to involve both DfC and NIHE to ensure additionality to the SHDP and</p>

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Main Issue	Council Response
	<p>paragraph 5.2.24 already acknowledges that NIHE may be body to 'administer' funds.</p> <p>The Council view the direct delivery of affordable housing off-site as preferable to the collection of commuted sums, where a developer can take responsibility for delivering affordable housing on behalf of a RHA. Planning permission must be secured in advance of application to be considered appropriately.</p> <p>However, where commuted sums are used, the Council agree that this must be ring-fencing for the provision of Affordable Housing in Belfast. We have added a new sentence at the start of paragraph 5.2.23 which states this explicitly.</p>
<p>The benefits of off-site financial contributions in lieu of on-site provision are fully recognised as a solution, subject to viability. BTR should be able to provide affordable housing via commuted payment</p>	<p>The Council have amended Section 5.2 to provide greater clarity in relation to the consideration of suitable alternatives. This includes a hierarchy of affordable housing products, as well as a simplified list of suitable alternative delivery approaches. Whilst Commuted sums are considered an option, for the reasons outlined above, this is seen as very much a last resort when it is accepted that all of the alternative options are not considered sustainable or viable.</p>
<p>We believe the term "problematic" could be removed from paragraph 5.2.23 as empty properties with significant 'problems' may not be attractive, feasible or value for money for an RHA. However, the refurbishment and occupation of all empty properties can provide a stimulus for regeneration and assist in meeting housing need.</p>	<p>The Council agree with this proposed wording change and have amended the relevant bullet point below paragraph 5.2.27 accordingly.</p>
<p>"...in consultation with NIHE/DfC" should be added to the final bullet point relating to other appropriate measures that may be identified to help increase the supply of affordable housing.</p>	<p>The Council would intend to involve both DfC and NIHE in work to develop appropriate proposals for the spending of any commuted sums collected. We therefore agree with this proposed wording change and have amended the relevant bullet point below paragraph 5.2.27 accordingly.</p>



Main Issue	Council Response
<p><b>Viability</b></p> <p>The quantum of affordable housing should be linked to the viability of the development. BTR development is marginal, and any requirement for affordable housing will make most schemes unviable.</p>	<p>The Council recognise that some forms of development are likely to face greater challenges in relation to viability than others. Policy HOU5 already includes a concession that "the Council will consider suitable alternatives on a case-by-case basis" where it is demonstrated that it is "not sustainable or viable" to meet the policy requirements in full. There is therefore sufficient flexibility to take the viability of development into account as part of the planning process, and no reason to amend the SPG further.</p> <p>Section 5.2 of the SPG provides detailed guidance on how sustainability and viability will be considered and a hierarchy of reasonable alternatives that could be considered. The SPG, as amended following consultation, notes that this may include the reduction in the number of on-site affordable housing units, which is considered preferable to both off-site provision and commuted sums as this better addresses the Council's priority, as dictated through Policy HOU5, of access to land (on-site) for affordable housing provision.</p> <p>It should also be noted that property value limits and eligibility requirements associated with each affordable housing product are set, following significant research, by DfC and reflect the target demographics for each individual product in relation to housing needs identified. Increasing (or decreasing) the level of discount offered through such a product would materially affect those who are eligible to access such products. A reduction in the number of affordable housing units is therefore also preferable to a change in the level of discount offered, which could result in a unit failing to meet an identified need.</p>
<p>The SPG in its current form has the potential to stifle investment, with knock-on effects for employers.</p>	<p>Whilst there may be a period of adjustment following the introduction of any new policy, the Council do not accept that the new Plan Strategy will stifle development and investment in the city</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>for the foreseeable future. The policy framework has sufficient flexibility to ensure that issues surrounding viability and delivery of full policy requirements should not place unreasonable burdens on BTR developments.</p> <p>As well as the provisions on viability within the Affordable Housing SPG, a separate Development Viability SPG has been drafted to provide much more detailed guidance in relation to the Viability Assessment process.</p>
<p>In some instances TCI funding may be too low to buy products in developments with extremely high market prices. There is also a funding challenge arising from the additional costs associated with the construction of social housing as part of tenure blind development.</p>	<p>The Total Cost Indicators (TCIs) provide a 'benchmark for social housing with an aim of achieving value for money in the provision of social housing and to ensure an appropriate level of grant is paid to RHAs to allow development to continue. These TCIs are based on land and property information supplied by Land and Property Services, as well as cost data from recently funded schemes.</p> <p>They are reviewed twice yearly by the Department for Communities and are intended to cover all costs, including any increases in the cost of construction. The TCIs are also accompanied by a number of supplementary multipliers that can be applied to the base TCI figures to allow for scheme variations whilst maintaining a relationship with the base 'norm' cost of a unit and its unit type. The guidance within the Housing Association Guide (HAG) also notes that some schemes up to as much as 30% over the TCI level can still be considered for approval</p> <p>It is therefore considered unlikely that RHAs are unable to receive appropriate funding levels to take account of the costs of construction within Belfast, including the City Centre. It should also be noted that TCI funding is only available to RHAs delivering social rented housing as part of the Social Housing Development Programme (SHDP) and so is not a limitation on other forms of affordable housing. The lack of funding under</p>

Main Issue	Council Response
	<p>the SHDP should therefore not stifle the delivery of housing.</p> <p>In relation to the additional costs arising from tenure blind design, paragraph 3.5.7 explains that the primary purpose is that tenures can't be distinguished visually from the external fabric of the building. However, the internal finishes and facilities don't necessarily all have to be identical. If there are specific additional costs arising from the external/communal specifications of city centre apartment schemes, there may be a need for additional multipliers within the TCIs to address this, but this is outside the scope of the SPG and would need to be considered by DfC/NIHE. However, from our research there is little evidence that tenure blind design has to lead to increased costs, particularly when considered from the outset of the design process.</p>
<p>In high demand markets the price for a property will be driven by location rather than specification and regardless of size any property is likely to exceed the property value limit for affordable housing.</p>	<p>It is noted that not all forms of affordable housing will be appropriate in all locations. The policy already allows for this through the consideration of suitable alternatives where delivery issues arise. We have also updated paragraph 4.4.10 to flag up the need to take account of property size and value requirements/limits for the various affordable housing products.</p>
<p>It would be useful to understand how the council can assess development costs for intermediate rent.</p>	<p>In the case of social housing, the Total Cost Indicators (TCIs) place limitations on grant funding available to address construction costs. However, all the other forms of publicly funded affordable housing currently available are demand driven and are therefore delivered in the same way as market units. We therefore expect that the cost of construction for intermediate housing for rent will operate in the same way and can therefore be modelled from a viability perspective in the same way as market housing. The only limitation would be rent affordability and any rental limits set. For example, DfC's Intermediate Rent Policy sets an upper limit of £40k net income for a two-adult household and an affordability</p>

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	<p>ratio of up to 30% of a household income would limit rent to c. £1,000 per month.</p> <p>However, the Council recognise that not all affordable housing products are funded in the same way and that this may cause them to have differing impacts on scheme viability. This is particularly important for RHAs who may be relying on government subsidy, low-cost loans and private finance to fund the developments. However, this will be a matter to be considered by DfC as part of the design of new product and the approach to public subsidy they are able to offer. However, the overall policy approach already has sufficient flexibility to take account of any viability issues that may arise in relation to new or emerging products.</p>
<p>The draft policy HOU5 and SPG states that KSR pertaining to certain larger housing sites in the plan may seek a higher contribution of affordable housing. In advance of the specifying what these contributions will be viability appraisals should be carried out.</p>	<p>The application of KSRs (Key Site Requirements) to zoned housing sites is a matter for the Local Policies Plan (LPP) and is therefore beyond the scope of this SPG.</p> <p>However, the Council have already undertaken strategic plan-wide viability testing in relation to the Plan Strategy policies and will use this to inform the Council's approach to site-specific viability testing as part of the LPP process. Clearly, there is a requirement for the Council to demonstrate that any proposals at LPP stage are realistic and deliverable, based on robust evidence, which will include demonstrating that key site requirements applied to zoning will not render development unviable.</p>
<p>In some locations build costs will be higher than market price, making immediate provision of housing unviable.</p>	<p>As part of the strategic plan-wide viability testing referenced above, the Council accept that residential values in some areas of the City may make the delivery of any market schemes. This is referenced in Figure 5.2 of the associated Development Viability SPG.</p> <p>Whether or not development involves the provision of affordable housing is not the main consideration given that housing schemes are</p>

Main Issue	Council Response
	<p>unlikely to be brought forward in the short-term, unless some form of public sector intervention is involved. In such cases, the provision of affordable housing will be a significant objective given the use of public funds.</p>
<p>Institutional investment is the main funding model for BTR, but institutional investors are not registered providers.</p>	<p>As noted above, the challenges for the viability of BTR development is acknowledged within Section 4.8 of the related Development Viability SPG.</p> <p>Whilst social rented housing and co-ownership housing have to be delivered by a RHA, there is nothing within the regional definition of affordable housing that requires all affordable housing to be delivered by an RHA. In fact, it specifically states that "affordable housing which is funded by Government must remain affordable or alternatively there must be provision for the public subsidy to be repaid or recycled in the provision of new affordable housing", which recognises that there may be occasions where affordable housing is delivered without any government subsidy.</p> <p>This has enabled the Council, in response to recent research undertaken and comments received as part of this consultation, to introduce a broader range of products that could help meet affordable housing policy requirements. This includes a Discount Market Rent product, which is recognised as having the greatest potential to be deliverable in a BTR context.</p>
<p><b>Policy Costs</b> In reference to 5.2.11, it is unclear what "costs of policy compliance" entails.</p>	<p>The cost of policy compliance is addressed in more detail within the Development Viability SPG. In brief, this includes other policies beyond affordable housing and the impact they may have on the overall cost of development. We have added additional wording to this bullet point within the Affordable Housing SPG to clarify that this isn't the cost of the affordable housing.</p>
<p><b>Section 76</b></p>	
<p>Model s76 agreements could be included within the SPG.</p>	<p>The Council considered the scope to provide a menu of model s76 agreement clauses as part of</p>

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	<p>the SPG, but have found that there is a benefit in maintaining a level of flexibility within the s76 process to cater for a broad range of circumstances.</p> <p>We intend to develop and publish a range of model agreements/clauses alongside the SPG, but keeping these separate from the SPG will allow for timely updates to the model clauses as and when needs arise without having to re-draft any part of the SPG.</p>
<p>RHAs should be consulted on wording of s76 agreements to ensure full workability.</p>	<p>When available, the model s76 Agreements should be considered a template that can be amended as required for the specific circumstances of each case in which they are used. Their publication on the Council's website will help to provide greater transparency in terms of what is likely to be acceptable to the Council to secure certain aspects of an agreed development. They are intended to be living documents that can be updated as necessary to take account of best practice examples from other jurisdictions, and to take account of learning from their use in a NI context. Therefore any feedback provided in relation to the wording of the model s76 Agreements for RHAs or other stakeholders can be taken into account when updating the documents periodically.</p>
<p>It should be clear in s76 that buyers of properties in development will not be adversely affected by reviews</p>	<p>The review process noted in Paragraph 5.2.15 should still fall within the delivery phase of the development and we agree that it would be unreasonable for an individual purchaser of a unit within a mixed tenure scheme to become liable for costs relating to the development of the site as a whole.</p> <p>The Council will therefore seek to ensure that s76 clauses are carefully worded to ensure the obligations are undertaken by the developer in a timely manner, including any review requirements. However, we would still advise that any future purchases content themselves that s76 obligations</p>

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	have been fully met as part of their due diligence in relation to any perspective house purchase.
<b>Critique of Colliers' Report recommendations</b>	
There needs to be a renewed focus by all stakeholders, including DfI, NIHE and NIFHA, to work together to effect changes to legislation, develop innovative ways of funding and new operating practices as necessary to assist in the increased delivery of affordable housing.	<p>Since the publication of the Colliers' report (SD006D) in August 2019, the Council have worked closely with a number of key stakeholders to help increase the delivery of housing across the city, including a specific focus on affordable housing products and city centre living. This has included:</p> <ul style="list-style-type: none"> <li>• Joint research with DfC, NIHE and Co-ownership housing association to consider the role of intermediate housing for sale in city centre living.</li> <li>• Undertaking research and policy development work jointly with the DfC, NIHE, NIFHA and Derry and Strabane District Council (with research recognising that such a product is only likely to be viable within the two larger conurbations of NI) in relation to an Intermediate Rent Policy and model.</li> </ul>
Provide developers with access to a register of surplus public sector lands, along with clear, up-to-date information on planning approvals, made fully accessible to the public	DfC are in the process of establishing a database of surplus public sector land assets that may be suitable for housing. Much of the information available regarding public sector land ownership is available in a mappable, GIS format via the Open Data NI website. <sup>4</sup>
Encourage the Council and other statutory landowners to be more proactive in land management and land assembly	<p>Public sector delivery is beyond the scope of the Affordable housing SPG. However, the Council are undertaking a significant amount of work to support the delivery of housing across the District, including:</p> <ul style="list-style-type: none"> <li>• Work to attract investment at scale for the City;</li> <li>• Work to consider how BCC, NIHE and DfC may collectively progress the use of their respective land holdings for housing led regeneration;</li> <li>• Embedding a number of key objectives and Actions within the Belfast Agenda and other</li> </ul>

<sup>4</sup> Available from: <https://www.opendatani.gov.uk/@land-property-services-public-land-and-property-assets/government-land-and-property-assets>

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	<p>corporate documents to further increase housing delivery;</p> <ul style="list-style-type: none"> <li>• Identifying and bringing forward fiscal levers (or financial models) to support housing-led regeneration;</li> <li>• Engaging with existing and new communities to support and sustain neighbourhood development through placemaking; and</li> <li>• Working with public and private developers to ensure Visions and Strategies (e.g. City Centre Living Vision, City centre masterplans) are embedded within design of schemes to ensure better placemaking.</li> </ul>
<p>Via the use of legally enforceable contracts, developers proposing to acquire public sector sites must be put under an absolute obligation to build and to do so within a pre-determined time limit</p>	<p>The mechanisms by which public sector bodies dispose of land is beyond the scope of the Affordable housing SPG.</p>
<p>Supplement private sector provision by enabling the public sector to also develop new housing, and adopt a more holistic, balanced policy approach to the housing sector as a whole</p>	<p>Public sector development of new housing is beyond the scope of the Affordable housing SPG.</p>
<p>Make more efficient use of the existing housing stock in the city</p>	<p>Planning policy seeks to manage the development and use of land and new construction and does not directly affect existing housing stock. This is therefore beyond the scope of the Affordable Housing SPG.</p>
<p>Social housing – any procurement issues need to be resolved to give clarity to the process, e.g., how a developer nominates its preferred HA to bring forward the affordable element of a scheme. This procurement process is widely used throughout the UK and therefore a workable solution should be achievable in a Northern Ireland context. Consideration also needs to be given to the implications of allocation policies on the wider development that are beyond the influence of a private developer</p>	<p>Updates to the Housing Association Guide (HAG) were formally published in January 2021 and are available from the Department for Communities' (DfC's) website.<sup>5</sup></p> <p>This includes specific advice in relation to social housing delivered by councils' Local Development Plans as affordable housing, which confirm that RHAs are able to engage with developers prior to a site being developed and provides advice to avoid conflicts with the Public Contracts Regulations 2015.</p>

<sup>5</sup> Available from: <https://www.communities-ni.gov.uk/development-and-associated-procurement-approaches>



Main Issue	Council Response
<p>The adoption of UK housing delivery models must be treated with caution, particularly given the challenging conditions of the Belfast property market. The private development sector requires certainty around its revenue outcomes, so the introduction of obligations around affordable rent and discount pricing may lead to land banking in the short term and will not bring forward much needed development. The market will require a period of transition to enable future land sales to reflect the new policy context.</p> <p>Housing associations may be best placed to pilot new affordable products with public sector support before being rolled out more widely.</p>	<p>Whenever a new planning policy is introduced in a District, if there is a change in the policy requirements, it is expected that a transition period may ensue whilst the markets adjust. We would expect over time, that any additional costs associated with policy requirements should in particular be reflected in land values. The findings of the Colliers' Report (SD006D) were therefore not surprising. Policy HOU5 already takes account of this 'transition' through the consideration of suitable alternatives where it is "not sustainable or viable" to meet the policy requirements in full.</p> <p>In terms of new products, research in relation to an Intermediate Rent model has progressed significantly since the Colliers report was drafted. This led to a consultation exercise undertaken by DfC in October 2021, with a report on the Outcome of the consultation published in January 2022.<sup>6</sup> The new Intermediate Rent Policy and associated Design Guidance was published in March 2023.<sup>7</sup> DfC are now working to appoint an Intermediate Rent Operator, who will more than likely take the form of an RHA, during 2023.</p> <p>The Council have also revised Section 3.3 to clarify the range of products that would currently be considered suitable, including new Discount Market Sales (DMS) and Discount Market Rent (DMR) products that could be delivered directly via a private developer, as well as RHAs, which affords even greater flexibility in how affordable housing can be delivered as part of mixed tenure development. These products have not simply been transferred to the NI context from other jurisdictions, but have been adapted to the NI context in terms of target demographic markets, the requirements for such units and affordability for prospective customers, etc.</p>

<sup>6</sup> Available from: <https://www.communities-ni.gov.uk/consultations/consultation-intermediate-rent-development-policy-and-model>

<sup>7</sup> Available from: <https://www.communities-ni.gov.uk/publications/intermediate-rent-policy-and-homes-intermediate-rent-design-standards>

## Council response to key issues raised

Main Issue	Council Response
<p>Assess opportunities for inventing new ways of living. There is a younger generation coming through that is far more experimental – significant opportunities are presented by the Build to Rent and Private Rented sectors.</p>	<p>The Council recognise the multiple benefits that can be realised through Build to Rent (BTR) developments, including a range of social and regeneration benefits and the ability to deliver housing at scale within relatively short timescales. Within section 4.8 of the Viability SPG, the Council sets out its intention to pro-actively support institutional and/or international investors who normally have the scope to invest almost anywhere in the world and notes that Council are working to address identified risks for such investors.</p> <p>The Council therefore agree that BTR development has significant potential to contribute to the housing and population growth Belfast aspires to, including the provision of wider affordable housing and helping establish a resilient market for City Centre Living.</p>
<p>Within the City Centre core, greater latitude and flexibility of the application of the LDP may need to be applied in the short term, until such times as significant development momentum has been created and a clear and understandable City Centre living market established. The use of viability testing is therefore vital in the application of the new policies, particularly for early developments within the City Centre core.</p>	<p>Policy HOU5 provides flexibility through the concession that "the Council will consider suitable alternatives on a case-by-case basis" where it is demonstrated that it is "not sustainable or viable" to meet the policy requirements in full.</p> <p>Section 5.2 of the SPG then expands on this policy statement, providing a detailed process and framework through which such cases will be considered. In addition, a separate Development Viability SPG has been drafted to provide much more detailed guidance in relation to the viability assessment process.</p>
<p>There is also a need for new intermediate housing products that would work in the City Centre context, as well as changes to existing products to reflect price inflation and differentials for the City Centre.</p>	<p>As noted above, work is ongoing in relation to a new publicly subsidised Intermediate Rent product which DfC hopes will be available in 2023. This is already recognised within Section 3.3 of the SPG as a suitable product to meet affordable housing need in the city centre. The Council have also now amended Section 3.3 to include new Discount Market Rent (DMR) and Discount Market Sale (DMS) products.</p>

Main Issue	Council Response
	<p>It should be noted that research has also been undertaken jointly by the Council, DfC, NIHE and Co-ownership Housing Association to consider the role of intermediate housing for sale in city centre living. This found that the existing shared-ownership model was unlikely to be appropriate in most of the City Centre due to the property values and likely delivery models.</p>
<p>The impact of the emerging policy could be profound on the City Centre core and as a consequence the policy must facilitate a review mechanism. We would suggest that a significant review ought to be carried out every three years and this to be a fact-based analysis set against pre-determined outcomes, objectives, etc.</p>	<p>The issue of monitoring policy impacts is not within the scope of this SPG.</p> <p>Mechanisms for monitoring LDP policies are set out within Section 11.2 of the Plan Strategy and include annual monitoring of key indicators set out in Appendix F, which include a number relation to affordable housing and housing mix. The results of this monitoring are required to be formally published within an Annual Monitoring Report once the Plan Strategy is adopted. Where issues are identified, this could lead to a number of actions, which are also set out within the LDP. There is also a statutory requirement for a five yearly review of the LDP to be carried out to ensure that the LDP is kept up to date and reflects and responds to emerging issues.</p> <p>These provisions, which have been subject to Independent Examination (IE), are considered sound (subject to amendments made in response to the DfI Direction following the IE process) and respond appropriately to the Colliers' recommendation regarding the monitoring and review of the policy impact within the City Centre core. Given that the annual monitoring and 5-yearly review are statutory requirements, it is not considered appropriate to amend either of these to provide a three yearly review.</p>
<p><b>Miscellaneous comments</b></p>	
<p><b>Role of the SPG</b> Sector-wide issues are better understood with the complexities recognised in the SPG, and the SPG plays an important role in</p>	<p>We recognise that the delivery of affordable housing in the NI context is complex, more so than in other jurisdictions as a result of the number of different stakeholders that must be</p>

## Council response to key issues raised

Main Issue	Council Response
<p>providing additional certainty to applicants and stakeholders.</p>	<p>involved in any individual scheme. We have attempted to capture much of this complexity within the SPG and have sought to make the process as legible to everyone as possible.</p> <p>As outlined within this consultation report, we have made a number of changes to the SPG in response to comments received, which we hope will help to further improve clarity and understanding of what remains a complex policy to implement.</p> <p>We agree that more work needs to be done across all housing delivery partners to ensure the effective delivery of these policy aspirations and will keep the guidance in this SPG as up to date as possible as the delivery process evolves and the policy beds in.</p>
<p><b>Delayed Implementation</b></p> <p>The SPG can't be published until the market is established and more affordable products are available. The publication of the SPG is therefore premature as there is a lack of funding and delivery mechanisms.</p>	<p>The Affordable housing policy requirements are contained within the draft Plan Strategy, which have already been subject to public consultation and an Independent Examination (IE). Following review by DfI, the Council have also received a formal Direction to adopt the Plan Strategy, subject to a number of modifications. The adoption of the Plan Strategy is therefore considered imminent and cannot be delayed by the Council. The Affordable housing policy (HOU5) will therefore become adopted policy when the Plan Strategy is formally adopted and cannot be subject to any further change at this point.</p> <p>The SPG has been drafted to provides additional guidance to assist in the implementation of this policy when adopted. As it doesn't change the fundamental policy context delaying its publication would beyond the adoption of the Plan Strategy would only leave uncertainty as to how the new policy may be implemented.</p>
<p><b>Threshold Avoidance</b></p>	<p>Support welcome.</p>

Main Issue	Council Response
<p>Minimum thresholds will bolster supply and create more mixed-tenure developments.</p>	
<p>Some respondents welcomed moves to address the artificial division of sites to avoid site size thresholds. Others voiced concerns surrounding sites being carved up to avoid the required contributions.</p>	<p>The Council are aware that with most threshold-based policies, whether for affordable housing or otherwise, there is a risk that a developer could make a deliberate decision to downscaled proposals to avoid planning policy requirements or obligations. This would be true regardless of where a threshold is set.</p> <p>The SPG recognises this specifically within paragraphs 3.2.3 and 3.24 and highlights the sort of situations where the risk is highest and what the Council would do in response</p>
<p><b>Updates</b> A refresh is needed when intermediate rent policy is published.</p>	<p>DfC published their Intermediate Rent Policy and associated Design Guidance on 30 March 2023. Paragraph 3.3.10 has now been updated to reflect this. As noted in paragraph 3.3.11 (now moved to paragraph 3.3.3), the Council have already acknowledged that the SPG will be updated when required to ensure the details of affordable housing products reflect the most up to date positions.</p>
<p><b>Pre-Application Discussions (PADs)</b> There should be no mandatory requirement for Pre-Application Discussions, rather they are good practice.</p>	<p>Although there is no mandatory requirement for Pre-application Discussions (PADs), they are intended to improve the quality of a subsequent application, giving a better chance of getting permission and enabling the Council to assess your application more quickly. PADs are therefore strongly recommended, particularly in instances where an applicant considers meeting the affordable housing policy requirements in full may not be possible. Within this context, we have however amended the SPG to clarify that PADs are strongly recommended rather than a formal requirement.</p>
<p><b>Appendix 3</b> The flow chart in appendix 3 sets out the Key Planning Stages clearly, and may be a bit lost in the third appendix. It could be moved up front to act like an executive summary.</p>	<p>Support for the flow chart contained in Appendix 3 is welcome. This was put together, alongside the process guide and checklist in Appendix 4 to help summarise the details outlined within the</p>

## Council response to key issues raised

Main Issue	Council Response
	SPG. However, without first reading the detailed information within the SPG the flow chart may be of less value and so is to be retained within the Appendix.
<p><b>Central Record</b></p> <p>Permissions that have a requirement for social / affordable housing should be recorded centrally.</p>	<p>Whilst this issue is perhaps beyond the scope of the SPG, the Council can see the merit in making a list of potential affordable housing units available to both prospective tenants/purchasers and RHAs. The details of every planning application, whether determined, pending or withdrawn are all available on the NI Planning Portal and can be searched and reviewed there. However, the Council will explore scope to create a more accessible public register of sites once the new Policy is implemented as part of the ongoing monitoring processes.</p>
<p><b>SME Support</b></p> <p>Support is needed for the SME (small and medium enterprises) sector to deliver developments in small sites.</p>	<p>The Council acknowledge that there is a need to support the SME construction sector given the greater proportion of smaller developers in the NI context. However, the nature of the applicant in terms of the size of business is not usually a planning consideration and therefore falls outside of the remit of the SPG.</p>

## Development viability

### Summary of Responses

Eleven respondents made representations in respect of the Development Viability SPG. Of the comments submitted:

- Several directly voiced **support** for the SPG, in areas such as the inclusion of Build to Rent (BTR) schemes and defining viability;
- Three related to the **viability assessment process**, including clarifications regarding the use of site-specific assessments;
- Three highlighted issues surrounding **Discount Market Rent (DMR)**, including how viability assessments could be used in deciding the amount of DMR units in new schemes;
- Three issues focused on **Build to Rent (BTR)** development, including how BTR would work in the conditions of Belfast's market;
- Four related to **Benchmark Land Value (BLV)**, including concerns about the concept being too generalised;
- Six highlighted issues surrounding **Developer Return**, including the nuances surrounding developer return in BTR schemes;
- Five discussed issues relating to development **costs**, including how fluctuating market circumstances can affect financing costs;
- Five related to the **Historic Built Environment**, for example how listed buildings may affect the value of sites;
- Two highlighted **rates**, particularly how the system in Belfast differ to other regions;
- Three related to the capitalisation of rental **yields**, highlighting how BTR yields will fluctuate depending on market circumstances;
- Six focused on issues surrounding **Value Bands**, including the clarity of value bands set out in Figure 4.2.
- Four related to the **Implementation Process**, including issues surrounding the PAD stage and funding models; and
- Various other comments, relating to topics such as **Policy HOU7** and how Belfast is **behind other cities** with regards to city centre living, were also highlighted by respondents.

### Responses Received

Reference	Respondent
SPG-R-03	National Trust
SPG-R-13	Bywater Properties Southbank Square MRP Wirefox
SPG-R-15	NIFHA
SPG-R-18	DfC - Affordable Rent Branch
SPG-R-20	DfC - Historic Environment Division

Reference	Respondent
SPG-R-21	NIHE
SPG-R-22	Clanmil Housing Group
SPG-R-24	Belfast Harbour
SPG-R-25	Titanic Quarter Ltd
SPG-R-26	Lacuna Developments
SPG-R-28	Swinford Sirocco 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>	
Welcome SPPS references as part of policy context	The council welcomes support.
Respondent had previously suggested that the SPG could be titled 'Economic Viability' or 'Financial Viability', but acknowledged that the explanation of the term viability in paragraph 3.1.7 addresses concerns previously raised.	The council welcomes support.
It is therefore welcome that the Council has acknowledged this issue of Viability through the publication of the SPG, which clearly recognises that "scheme viability is a material consideration in the determination of planning applications".	The council welcomes support.
It is further welcome that the Council has acknowledged the importance of Build to Rent schemes and differences in their funding models, declaring that the Council are working to support inward investment by addressing identified risks.	The council welcomes support.
<b>Viability Assessment Process</b>	
It would be useful if the final SPG could clarify how the 'ability to deploy site-specific assessments' will be triggered as opposed to a generic assessment.	We accept this comment and have sought to clarify within paragraph 2.2.7. The SPG notes in Section 6.1 that the focus of viability discussions at PAD stage are to determine the specific aspects of policy compliance which cause a viability concern, with a site-specific viability appraisal subsequently undertaken as part of the planning application process.
The cost of the viability assessment is to be borne by the applicant and paid upfront. This should be made explicit on the Council's website and application forms so that it is clear at pre-application stage.	It should be noted that each proposal will be considered on a case-by-case basis. In some cases, an objective review of viability will be required, however, cost of such assessment would vary. Therefore, it is impossible to provide exact cost of such review before knowing the proposal.
It is not clear in Figure 4.1 if the Min and Max land values relate to the block or the dotted lines. Can the key be made clearer?	We have updated Figure 4.1 accordingly.
<b>Discount Market Rent (DMR)</b>	
In relation to forward funded BTR schemes, institutional investors will not invest into a	The Council accept that including a Discounted Market Rent product would help



Main Issue	Council Response
<p>development with shared ownership and as a direct consequence BTR schemes will not be fundable if there is a requirement for ownership of part by a Registered Housing Association. Discounted Market Rent offers a potential alternative solution which could still meet the funding criteria required by Institutional / International Investors.</p>	<p>broaden the range of products available and provide additional flexibility, catering for circumstances where other products may not be appropriate. DfC have confirmed that although only a DfC appointed Intermediate Rent Operator will be able to access financial assistance from the government, other landlords are able to deliver an intermediate rent product without public sector support when adhering to the Intermediate Rent policy provisions.</p> <p>This raises the prospect of a private landlord or investor being able to deliver a discounted rental unit to certain eligible households directly, which would align with the broad definition of a Discount Market Rent (DMR) product used in other jurisdictions as highlighted by a number of respondents. Both the Development Viability and Affordable Housing SPGs have been updated to reflect this additional product.</p>
<p>In the context of affordable housing, a viability assessment could inform a decision about whether it is preferable for a local authority to accept a lower proportion of DMR units in a scheme if the level of discount to market rent was in excess of a standard benchmark such as 20%.</p>	<p>We are aware that provision of DMR units would have an impact on viability. In some cases, when a development proposal will be unviable, the SPG provides number of options that could be considered - please refer to the process outlined in para 6.2.14.</p> <p>However, it should be noted that the criteria for each of the affordable housing products are specific to the NI context in terms of target demographic markets, the requirements for such units and affordability for prospective customers, etc. To reduce the level of discount for DMR below 20% is therefore likely to result in the affordable unit no longer being 'affordable' for the intended target demographics and so will not be considered. Instead, a reduction in the overall number of units providing the 20% discount could be considered in accordance with the sequential approach set out within Section 5.2 of the</p>

## Council response to key issues raised

Main Issue	Council Response
	related Affordable housing and housing mix SPG.
<b>Build to Rent (BTR)</b>	
<p>It is understandable that the Council has sought to import best practice from other jurisdictions; however, we don't believe that this approach has fully appreciated the bespoke market conditions in Belfast/NI, e.g. BTR Market.</p>	<p>We agree that there is no guidance in NI and therefore, we adapted best practice in other jurisdictions to Belfast context. Obviously, the Belfast market has its own nuances and cannot be directly compared with the rest of the UK. However, there is a lot of flexibility built into the policies and the SPG.</p> <p>The Council have clarified the range of products that would currently be considered suitable, including new Discount Market Sales (DMS) and Discount Market Rent (DMR) products that could be delivered directly via a private developer, as well as RHAs, which affords even greater flexibility in how affordable housing can be delivered as part of mixed tenure development. These products have not simply been transferred to the NI context from other jurisdictions, but have been adapted to NI circumstances in terms of target demographic markets, the requirements for such units and affordability for prospective customers, etc.</p>
<p>There is a significant risk that the SPG guidance places additional challenges on viability/delivery before any BTR has even started. BTR developers backed by appropriate funding have already been investing in virtually all regional city locations in both UK and Ireland, but Belfast is arguably the only major city of comparable size that to date has not witnessed any BTR development to date. While a number of schemes are proposed none have yet commenced construction putting Belfast 2 or 3 years behind other locations.</p>	<p>It is not the intention of the Council nor the planning policy framework to stymie any development, including BTR schemes. Policy HOU5 specifically makes provision for the consideration of 'suitable alternatives' on a case-by-case basis where it can be demonstrated that it is neither sustainable or viable to deliver the policy requirements in full. Section 5.2 of the Affordable Housing SPG provides detailed guidance on how sustainability and viability will be considered and a hierarchy of reasonable alternatives that could be considered. The policy framework therefore has sufficient flexibility to ensure that issues surrounding viability and delivery of full policy requirements should not place unreasonable burdens on BTR developments.</p>

Main Issue	Council Response
	<p>In addition, The Council are aware of the specific challenges for prospective BTR developments and is actively considering what support may be required/can be provided to encourage early uptake. In 2020, CBRE completed research to provide the Strategic Investment Board and DfC with a sound evidence base to determine whether BTR development is suitable for the Northern Ireland housing market and if so, to explore the most cost-effective funding model(s) for delivery. The focus was on how government, including local government, can intervene to help facilitate delivery, particularly in relation to financing. It provided an overall analysis of the BTR market potential and any barriers to delivery that the public sector could help to address.</p> <p>It concluded that "Northern Ireland, and in particular, Belfast, is well positioned to secure investment into the Build to Rent sector, given the considerable investor interest already demonstrated, and the underlying demand dynamics." It also suggests that "When benchmarked against other regional city locations Belfast should already be witnessing development in the BTR sector..." but that this is being curtailed by other factors including viability and the absence of a suitable affordable housing product such as Discount Market Rent.</p> <p>As noted above, the Council have introduced a broader range of affordable housing products that could help meet affordable housing policy requirements. This includes a Discount Market Rent product, which is recognised as having the greatest potential to be deliverable in a BTR context.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>Paragraph 5.3.2 does not reflect current market circumstances and developers have concerns on viability/delivery of significant BTR development in Belfast without public sector intervention measures. A social or affordable component adds further pressures and challenges to the viability of such schemes.</p>	<p>Paragraph 5.3.2 and Figure 5.2 reflect the outcomes of independent research undertaken for the Council to consider overall viability of development as a result of Plan Strategy policies. This is not intended to provide a detailed assessment of every possible scheme, but rather gives a broad overview of the baseline position to help in considering site-specific viability. This includes recognition that BTR development is likely to be marginal in viability terms in the City Centre and identifies key factors that may impact on this, including price paid for land and construction costs associated with taller buildings.</p> <p>The Council therefore recognise that some forms of development are likely to face greater challenges in relation to viability than others and the overall policy approach to viability allows flexibility for site-specific considerations on a case-by-case basis.</p>
<p><b>Benchmark Land Value (BLV)</b></p>	
<p>Benchmark land values again could be a very generalised way of considering land value as there are so many variables associated with City Centre land value and every comparable has differing nuances that sites rarely have the same value applied to them. This needs further detail and consideration.</p>	<p>Whilst it is true that the actual price paid for land may vary from site to site, the BLV provides a robust methodology for strategic viability testing purposes. The use of BLV is an industry recognised approach to the assessment of viability of development.</p> <p>However, we would expect actual price paid to take account of site specific issues and constraints. Similarly we recognise that there may be occasions where competition for land can inflate values. However, if the price actually paid for land is likely to result in a failure to meet policy requirements in full then there is a risk that planning permission will not be secured.</p> <p>We also recognise that there are always unforeseen matters that may arise, including site specific constraints that are unknown at the time of purchase. In terms of strategic</p>

Main Issue	Council Response
	<p>testing, modelling included contingency allowances and were tested for sensitivity to small changes in costs. Together these should help account for minor variations on a case-to-case basis. However, where a full viability appraisal is required, actual costs can be used in testing.</p>
<p>Land will always be sold at market value so we struggle to see how land can be acquired at below current benchmark land values without public sector interventions.</p>	<p>We agree that this phrase 'below current benchmark land value' may be misleading and have therefore amended Figure 5.2 Value Band City Centre accordingly. Whenever a new planning policy is introduced in a District, if there is a change in the policy requirements, it is expected that a transition period may ensue whilst the markets adjust. We would expect over time, that any additional costs associated with policy requirements should in particular be reflected in land values.</p>
<p>Paragraph 4.3.3 bullet point 2 states that the costs of dealing with site specific constraints such as contamination, flood mitigation, access difficulties, etc. should have been considered when assessing the value of land. However, it is not always the case that all constraints are known and/or considered when assessing the value of the land as this will be pre-planning.</p> <p>The final SPG should recognise and support the ability to revisit viability after the PAD stage to reflect changes made before and following the submission of an application and prior to the signing of a Section 76 legal agreement.</p>	<p>There is always a risk of unexpected cost that should be maintained in valuation. An important principle in considering development viability is therefore that land should be acquired at a price that takes into account all known costs, including the costs of complying with all planning policy requirements (please refer to para 4.3.4). One of the ways to mitigate the risk is to apply higher percentage of developer profit. However, the realisation of such a risk would not itself be a reason to claim that a subsequent reduction in return would render a development unviable.</p> <p>The SPG notes in Section 6.1 that the focus of viability discussions at PAD stage are to determine the specific aspects of policy compliance which cause a viability concern. It is therefore not anticipated that a full detailed viability appraisal will be undertaken at PAD stage, but rather as part of the planning application process. As the determination of the planning application and signing of the s76 Agreement are carried out in tandem, they</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>should both be based on up-to-date viability information submitted as part of the application. If this information changes throughout the planning process, the Council would expect an applicant to keep the case officer updated as appropriate.</p>
<p>How does the Council's approach impact land already acquired at site prices that do not reflect the negative impact a social /affordable policy will have in the future?</p>	<p>We agree that there can be situations where price paid for land already acquired would not reflect impact of any future policy requirements, including affordable housing policy. Clearly there is always a risk with land transactions that values might be negatively affected by future events. However, this risk is well known and developers are used to finding ways to mitigate it.</p> <p>Whenever any new policy environment is introduced, we would expect that there may be a period for re-adjustment of market values. The overall viability assessment approach outlined within the SPG is therefore designed to allow proposals with viability challenges to be dealt with on a case-by-case basis.</p>
<p><b>Developer Return</b></p>	
<p>The Developer Return assumption appears to assume that all "affordable housing" (i.e. social housing, intermediate for sale, and intermediate for rent) are all costed and funded in the same way and are all deliverable with a 6% return. This is not the case.</p>	<p>3 Dragons and Ulster University report prepared in July 2020 modelled profit based on 6% of cost to the provision of social housing. However, we acknowledge that other forms of affordable housing should be modelled with the same return as market housing and have amended figure 4.3 accordingly.</p>
<p>The draft SPG provides no explanation for the return established and goes on to say that there 'may on occasion be exceptional circumstances where an applicant believes a proposal requires an alternative return'. The application of an exceptional circumstances test is an extremely high policy test, particularly given that no justification is provided to support the assumptions set out in the draft SPG.</p>	<p>3 Dragons and Ulster University report prepared in July 2020 modelled return at 15% for the provision of market and other forms of intermediate housing, with variations for social housing and BTR development (see below). This reflects industry standards at the time and was based on thorough engagement with the development industry. 15% is recognised as a reasonable return generally and we would</p>

Main Issue	Council Response
	expect it to be very rare that circumstances would arise to justify a higher rate of return.
<p>A 10% developer return for a BTR rent is only appropriate where a scheme is forward funded or forward sold to an institutional investor. While this is the generally accepted delivery model there will be instances where a landowner may seek to deliver a scheme either themselves or partner with a specialist BTR operator to let up and stabilise a BTR scheme. If that is the case the developer will need a higher rate of developer return to not only reflect developer risk but also to ensure any 3rd party debt-based bank can see that an appropriate level of developer return to reflect risk is built into the model.</p>	<p>As noted above, the Council have done specific testing for BTR development in the Belfast context. As noted by respondents, 10% profit is normally applied to the provision of BTR housing in case of schemes which are forward funded or sold to an institutional investor as their return expectations are typically lower over the longer term.</p> <p>However, for debt-based investments we accept that it may be appropriate to allow for a 15% profit in line with other forms of market housing. Therefore, the Council accept that correction is required for clarification and have amended figure 4.5 accordingly.</p>
<p>Does Section 4.5 include commercial viability as well?</p>	<p>This SPG focuses on residential Viability. This has been confirmed in amended para 1.0.1. However, any commercial elements should be factored into the viability on a case-by-case basis.</p>
<p><b>Costs</b></p>	
<p>CBRE NI note that the Council's assumptions do not give any consideration to an allowable level of Operational Expenditure (OPEX) deduction, which must be taken into consideration and could be between 25 – 30% of the gross rental income for a BTR scheme.</p>	<p>Operating expenses (OPEX) may include maintenance, utilities, accounting, legal, marketing, advertising and professionals' fees. All of these assumptions were included in strategic testing undertaken by 3 Dragons and Ulster University report prepared in July 2020 and are therefore already built into our viability testing models.</p>
<p>Para 4.7.3 - There should be provision to allow for finance costs to move upwards or downwards from the 6% &amp; 8% figures above depending on prevailing banking and economic conditions.</p>	<p>We agree that these figures should be more flexible. Therefore, this table has been removed from the SPG and will be inserted into the Key Assumption document which can be updated as required.</p>
<p>Figure 4.4 does not reflect the development costs specified in paragraph 4.6.2 above.</p>	<p>We acknowledge that this is the case and have amended paragraph 4.6.2 accordingly.</p>
<p>Paragraph 4.9.2 of the draft SPG refers to an allowance of £1,000 per dwelling to be modelled in viability assessments to account for local mitigation measures. However, the figure is not recent and should be reviewed on an annual</p>	<p>The £1,000 figure was used for strategic viability modelling. However, in reality, when undertaking a detailed site-specific assessment we would always have access to the actual costs.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>basis with updated figures published for modelling in viability assessments.</p>	<p>We have therefore removed the exact figure throughout the document and it will instead include an up to date figure as suggested within the related Key Assumption document. This approach will allow for timely updates as and when needs arise without having to re-draft the SPG.</p>
<p><b>Historic built environment</b></p>	
<p>Policy BH2 requires that 'due regard' is given to viability of retention or restoration of the existing building. Proposed text at paragraphs 3.2.3 and 4.6.3 could be interpreted as the retention of a building may raise viability issues for development. Alternative wording was suggested.</p>	<p>We agree with suggested wording and have amended the SPG accordingly to emphasis a presumption in favour of retention of heritage assets. The proposed text has been inserted at paragraph 3.2.3 and as an additional bullet point below paragraph 4.6.3.</p>
<p>Benchmark land value section and alternative use section should recognise that listed buildings are usually identified as a reason for lower site value, due to development constraints.</p>	<p>We agree with this comment and paragraph 4.3.3 bullet point 2 has been amended to reference the protection of heritage assets.</p>
<p>The Council may also wish to consider an extra line on archaeology in this paragraph also. There is useful language in PPS6 para 3.21 around unexpected discoveries that might affect the course of a development.</p>	<p>We agree with this comment and paragraph 4.3.3 bullet point 2 has been amended to reference archaeological remains as a potential constraint.</p>
<p>Suggest replacing the word 'treatment' in Para 4.6.5 with 'conservation' as the management of change should be based on an understanding of the asset's significance. It would be appropriate to include a sentence which recognises that application of built heritage policies will generally result in reduced densities with more open spaces to protect heritage assets and the integrity of their settings.</p>	<p>Paragraph 4.6.5 has been amended as suggested to replace word treatment with 'conservation' and an additional bullet point added below paragraph 4.6.3 relating to impacts of heritage assets on density and open space.</p>
<p>The SPG states that in certain cases where there are viability issues, other planning considerations or obligations may be set aside. For listed or non-listed buildings in a conservation area, every effort should be made to find an appropriate viable alternative use for the building to remain consistent with the approach to sustainable development set out in the SPPS and LDP.</p>	<p>It is not intended that viability would allow development to take place that fails to meet multiple policy requirements. However, for the sake of clarity, additional text has been added to paragraph 4.6.5 to address this potential issue with regards to built heritage.</p>



Main Issue	Council Response
<p>Viability may also become a key consideration in the case of listed buildings and non-listed buildings in a conservation area if specialist construction skills are required or low/zero carbon heating is retrofitted, as these could result in higher construction costs.</p>	<p>We have added both of these potential issues that could result in increased construction costs in the case of heritage assets as additional bullet points below paragraph 4.6.3.</p>
<p><b>Rates</b></p>	
<p>Across the UK, the industry norm is that the Rating Authority invoices and collects from each occupant, whereas in Belfast the prevailing strategy is to invoice the developer for the collective Rates. This presents an additional cost in the financial modelling of schemes which is not reflected in any other regional locations.</p>	<p>We accept that NI has its own approach to rates that cannot be directly compared with the rest of the UK. The Council recognise that some forms of development are likely to face greater challenges in relation to viability as a result of this, most notably BTR development. The research undertaken for the Council by 3 Dragons and Ulster University in July 2020 specifically tested BTR development and includes an allowance for the rates bill in addition to rent. We are therefore content that the overall approach to viability factors this in adequately.</p>
<p><b>Yield</b></p>	
<p>Query whether to include a mechanism to allow change to the rental yield to reflect a change in market conditions over the lifetime of the SPG. BTR yields will be reflective of other financial and real estate market demand/supply factors which will fluctuate over the lifetime of the SPG.</p>	<p>As noted above, the assumptions within the SPG are based on industry standards identified by 3 Dragons and Ulster University in July 2020 following thorough engagement with the development industry. As noted by a number of respondents, yields generally vary between 4-5%, which confirms that a 5% yield is reasonable for viability testing purposes, although we acknowledge that specific scheme yields may vary from this. Therefore, we have amended wording of para 4.8.5 of the SPG.</p>
<p><b>Value Bands</b></p>	
<p>We agree with the comment that there are significant challenges presented with viability with taller schemes in the City Centre (Figure 5.2).</p>	<p>Support for the outcomes of our strategic viability testing is welcome.</p>
<p>It is also noted that the research on market values across Belfast as shown in Figure 4.2 dates from 2019, which is now out-of-date, as values would have changed since then.</p>	<p>The research on market values and rental prices used to establish the Value Bands is based on data from 2016-2019, which was the latest available at the time of the work. While the actual property values within bands may</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>have changed since 2019, the spatial distribution of Value Bands across Belfast is unlikely to have been affected, so the Council are content that the approach to value bands remains appropriate. However, we will continue to monitor market values and rental levels to ensure key assumptions for viability remain current.</p>
<p>Figure 4.2 of the draft SPG tries to present the areas for each value band but is very unclear. We had requested that reference could be made to where a detailed map showing different value bands could be found and note that this has not been provided. It should be made explicit in the SPG that information on value bands at a localised level is not publicly available, but that a PAD will need to be requested to obtain this information.</p>	<p>It should be noted that Figure 4.2 is only an indicative illustration and is intended to provide a strategic overview of the patterns of house values, rather than a precise assessment of values on every site. In reality, value vary on a street-to-street basis, which would be extremely difficult to map within the SPG.</p> <p>Paras 6.1.1 to 6.1.3 explain PAD process and list specific aspects that could be discussed at that meeting. This includes agreeing which value band a site falls within. At this stage the appropriate value can be agreed by all parties to form the basis for comparison to actual values as part of a viability assessment at application stage.</p> <p>Although there is no mandatory requirement for Pre-application Discussions (PADs), they are intended to improve the quality of a subsequent application, giving a better chance of getting permission and enabling the Council to assess applications more quickly.</p>
<p>Given the assumption that the most likely form of development in Value Bands 4 and 5 will be social housing it is disappointing that the viability of social housing has not been considered.</p>	<p>As noted in Figure 5.1 and 5.2, our strategic viability testing has included the modelling of both 20% and 100% social housing in Value Bands 4 and 5.</p>
<p>Figure 5.2 refers to the need for 'A significant increase in values from 2019 levels (c. 18-23%)' to help improve viability. Does this take account of the increase in house prices since 2019?</p>	<p>As stated, these figures are based on percentage changes required to 2019 prices in order to make development more viable. Therefore, it is essential that this data is monitored and amendments made as required based on the latest data available.</p>

Main Issue	Council Response
	<p>We are aware that house prices have increased since 2019, but this is unlikely to have been sufficient to make development in these value bands viable yet. Our strategic viability study notes that the significant increase in values in these Value Bands would be required without a corresponding increase in costs to make developments in these areas viable and we are aware that costs have also risen, albeit potentially by a lesser proportion.</p>
<p><b>Implementation process</b></p>	
<p>The Council should make developers aware of all potential costs at the PAD stage including PAD fees, Planning Performance Agreement (PPA) fees, Section 76 legal and monitoring costs, and the cost associated with the review of any viability information.</p>	<p>We agree that developers should be aware of all additional costs associated with development and the Council website already provides such advice and information in relation to the PAD process<sup>8</sup> and PPAs<sup>9</sup>, etc. Such information will be updated as and when required as the new LDP policies become operational. However, many of the potential costs such as PPA fees, monitoring cost, review costs, will need to be agreed at different stages of planning process and can vary for individual schemes.</p>
<p>The Council is expected to retain expert advice in order to review viability information submitted with planning applications. The Council should consider developing a Framework from which expert advice can be secured at best value to ensure that charging like this is fair and reasonable.</p>	<p>The Council intend to establish a framework of suitably qualified experts to review viability information in order to achieve best value advise. However, the exact cost is likely to vary on a case-by-case basis depending on the scale of development and information available for review.</p>
<p>There should be a review mechanism during the PAD stage, following the submission of an application and prior to the signing of a Section 76 legal agreement to review the viability of a scheme and the necessary developer contributions.</p>	<p>The SPG notes in Section 6.1 that the focus of viability discussions at PAD stage are to determine the specific aspects of policy compliance which cause a viability concern, with a site-specific viability appraisal subsequently undertaken as part of the planning application process. It is therefore not anticipated that a full detailed viability appraisal will always need to be undertaken at</p>

<sup>8</sup> <https://www.belfastcity.gov.uk/Planning-and-building-control/Planning/Applying-for-planning-permission/Pre-application-advice>

<sup>9</sup> <https://www.belfastcity.gov.uk/Planning-and-building-control/Planning/Applying-for-planning-permission/Major-development-applications>

## Council response to key issues raised

Main Issue	Council Response
	<p>PAD stage, but rather as part of the planning application.</p> <p>As the determination of the planning application and signing of the s76 Agreement are carried out in tandem, they should both be based on up-to-date viability information submitted as part of the application. If this information changes throughout the planning process, the Council expects an applicant to keep the case officer updated as appropriate.</p> <p>It should be noted that the SPG also refers to review mechanism in Section 6.3 as part of s76 Agreements. This is intended for larger, more complex developments where concessions may have been made as part of the application process, which would allow for re-appraisal of viability throughout delivery of the scheme to ensure that the viability information assessed aligns with the actual costs, values and returns as the scheme is delivered.</p>
<p><b>Funding</b></p> <p>The viability model gives no consideration to the funding model associated with the delivery of affordable housing products from a housing association perspective. In considering a single tenure social housing scheme or the affordable housing element of a mixed tenure scheme, viability is a key consideration for a housing association and obligations placed on the planning permission will impact on this. The funding and viability model for a housing association is very different to that of a private sector developer. For example, their viability margins will ordinarily be lower and any surplus made is re-invested to provide further social rented housing elsewhere. It is therefore important that their viability margins are maintained.</p>	<p>The Council recognise that not all affordable housing products are funded in the same way and that this may cause them to have differing impacts on scheme viability. In development viability terms, the publicly subsidised products will all be delivered by a private developer at cost and usually be sold/transferred to a RHA at market value. However, this necessitates a private developer to supply the right size and type of units to be suitable for use within the relevant product parameters. For a private developer, therefore, there will be a limited impact on viability arising from the delivery of affordable housing.</p> <p>In the case of Discount Market Rent/Sale products, we recognise that these products are likely to have a greater impact on viability for a</p>

Main Issue	Council Response
	<p>private developer, given a direct impact on the value of property realised. However, the viability process set out within Policy HOU5 and this SPG provides sufficient flexibility to take account of any difficulties arising on a case-by-case basis.</p> <p>However, we recognise that the funding arrangements for each product will have differing implications for RHAs, dependent on the product being delivered, the availability of public subsidy and private financing. There may therefore be greater implications for RHAs in cases where they are leading the delivery of an entire scheme and there may be situations where a particular RHA cannot commit to a proposed affordable housing element of a scheme because of the availability of funding. In the future, subject to clarification around Article 15 of The Housing (Northern Ireland) Order 1992, delivery of mixed tenure development may offer opportunities for RHAs to cross-subsidise affordable housing provision with profits from full market sale/rental properties, etc.</p>
<b>Miscellaneous</b>	
<p><b>Commercial Element</b></p> <p>The SPG focuses on residential viability and no other commercial or other uses such as offices, student accommodation, industrial development, etc. which may also experience viability issues. Will there be additional documents providing guidance in relation to these uses?</p>	<p>This SPG focuses on residential viability as this is the form of development where the most challenge is currently experienced and where we anticipate an increased focus on viability as a result of the new LDP policies. However, where residential development forms part of mixed use development, any commercial elements can be factored into the viability on a case-by-case basis. This has been clarified in amended paragraph 1.0.1.</p>
<p><b>HOU7</b></p> <p>Figure 4.7 states that HOU7 is accounted for through an 'increased size of social units to meet criteria'. However, this policy is applicable to all new dwellings, not only social housing.</p>	<p>We have amended the text in Figure 4.6 to remove the reference to social housing.</p>

## Council response to key issues raised

Main Issue	Council Response
<p><b>Typologies</b></p> <p>Para 5.2.3 – It is stated ‘The typologies used in the strategic plan-wide viability assessment include high density city centre flatted schemes, mixed schemes of houses and apartments and lower density, more suburban housing’ – does ‘flatted schemes’ mean apartments?</p>	<p>Yes, the term ‘flatted scheme’ refers to a development of apartments. We have amended para 5.2.3 to use the term ‘apartments’ consistently.</p>
<p><b>Template</b></p> <p>The Development Appraisal Template should be updated to include additional information required to ensure a robust appraisal is provided for BTR schemes. These include capitalisation yield, deduction of costs to formulate a Net Development Value rather than Gross Development Value and the inclusion of any allowable purchaser costs, etc.</p>	<p>Whilst we can see the value in including this additional information within the Executive summary template, some of these items could result in an overly complex template for non-BTR schemes. We have therefore amended Appendix 1 in a number of places, as well as created a new template specifically for BtR schemes (Appendix 2).</p>
<p>Whilst it is set out clearly that the draft SPG is providing additional advice and guidance specific to the development viability considerations in Belfast it does also set out a template for viability assessments and a series of thresholds and parameters for assessing viability. As such it is unclear whether the SPG will be a guidance document or whether it is a template to be adhered to.</p>	<p>This SPG provides guidance in terms of the Council’s overall approach to the assessment of viability and is not therefore a policy to be adhered to. However, the use of templates and key assumptions will help provide greater clarity and should avoid protracted discussions around allowances that are generally recognised as industry standards. However, the Council will continue to monitor a number of key indicators and will update the related Key Assumptions document as and when required to ensure it reflects the most up-to-date position.</p>
<p><b>Behind Other Cities</b></p> <p>There should be an explicit acknowledgement by the Council that Belfast has not experienced the same level of growth in city centre living as other UK cities such as Leeds, Liverpool, Manchester etc, and that more should be done to support the establishment and growth of city centre living in Belfast.</p>	<p>The Council recognise that city centre living in Belfast is still in its infancy and may require support to encourage early uptake. Whilst beyond the scope of this specific SPG, the Council are working in a number of ways to support the growth of city centre living. For example, BCC attracts investment for the city by supporting and sponsoring the Renewed Ambition Public/Private Partnership (RAP) platform and a number of relevant policy documents, including the Belfast Agenda, Corporate Plan, Belfast Our Recovery, Belfast City Centre Regeneration and Investment</p>

## Council response to key issues raised

Main Issue	Council Response
	<p>Strategy (BCCRIS) and Reset for Growth. Additionally, the Council is part of cross-organisation group which is the agreed mechanism for bringing forward housing-led regeneration and strategic public sector sites programme.</p> <p>Specifically in relation to BTR development, we have included a new paragraph in section 4.8 to outline the Council' understanding of the BTR context and importance of supporting such investment.</p> <p>The Council recognise that some forms of development are likely to face greater challenges in relation to viability than others. Affordable Housing policy (HOU5) makes specific provision for the consideration of 'suitable alternatives' on a case-by-case basis where it can be demonstrated that it is neither sustainable nor viable to deliver policy compliant development. The policy framework therefore has sufficient flexibility to ensure that issues surrounding viability and delivery of full policy requirements should not place unreasonable burdens on BTR developments.</p>

### Residential design (including adaptable and accessible accommodation)

#### Summary of Responses

Fifteen respondents made representations in respect of the Residential design SPG. Of the comments submitted:

- There was **support** for guidance on adaptable and accessible accommodation and of reference being made to Housing Association Guidance;
- One respondent requested that transport/infrastructure requirements be added in relation to **Key Site Requirements (KSRs)**;
- It was suggested that corner sites should require high quality **boundary treatment** to enhance visual quality and improve residential amenity.
- Requirements for additional content relating to **spacing** and consideration towards requirements for mid-terrace passageways were highlighted;
- It was suggested that reference to **electric vehicle (EV) charging points** should be made and that they should be accessible;
- The need to emphasise **energy efficient** design was raised;
- The importance of infrastructure to accommodate **high density development** was highlighted;
- The need for **backland development** to achieve adequate amenity space and separation distance was raised;
- Three related to **accessibility** including the need to ensure equality of access for all occupants and the importance of recognising that it may not always be possible for all units to achieve direct access to the street;
- It was suggested that a **conservation-led approach** should apply to the conversion of listed buildings. It was suggested that the guidance should refer to viability as a consideration when determining the acceptability of conversion to residential use;
- Requirements for additional content relating to **open space** were highlighted, including the need to reference other forms of communal areas, that there should be a preference for green open space;
- The need a stronger emphasis on **Sustainable Drainage Systems (SuDS)** in the guidance was suggested and there was a requirement for clarity in relation to SuDS as being areas of flood mitigation or open space;
- Issues were raised in regard to specific **standards**, including residential space standards and road standards/design;
- Two concerned issues relating to **management arrangements**;
- Requests for changes to content relating to **natural light** were made, alongside the desire for reference to be made to **shading**;
- **Retrofitting** existing housing stock was highlighted as an issue requiring attention;
- Several related to **disability requirements** including the accessibility needs of disabled persons, provision of disabled parking standards, wheelchair turning circles and reference to wet rooms;
- A query was raised in regard to the use of **terminology** within the Residential design (including adaptable and accessible accommodation) SPG and the Affordable housing SPG;



## Council response to key issues raised

- Several made **image and text suggestions** to replace or expand upon existing content;
- A number related to **links and references**, suggesting other documents that could be referenced and mentioning key aspects of other guidance to introduce clarity/avoid confusion; and
- One focussed on the need for policy to be supported by prompt **decision-making**.

### Responses Received

Reference	Respondent
SPG-R-02	Anonymous - Respondent No 2
SPG-R-03	National Trust
SPG-R-04	MAG for Architecture and the Built Environment
SPG-R-12	Co-Ownership Housing Association
SPG-R-13	Bywater Properties, Southbank Square, MRP, & Wirefox
SPG-R-18	DfC - Affordable Rent Branch

Reference	Respondent
SPG-R-20	DfC - Historic Environment Division
SPG-R-21	NIHE
SPG-R-22	Clanmil Housing Group
SPG-R-23	Turley
SPG-R-24	Belfast Harbour
SPG-R-25	Titanic Quarter Ltd
SPG-R-26	Lacuna Developments
SPG-R-27	DfI - Roads (DfI TPMU/TICC)
SPG-R-28	Swinford Sirocco Ltd
SPG-R-31	John Graham

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

Main Issue	Council Response
<b>Support</b>	
The guidance on HOU7 is welcomed.	The Council welcomes support for the guidance on Policy HOU7.
Recognition that HAG is a relevant consideration is welcomed.	The Council welcomes support for this aspect of the SPG.
<b>Key Site Requirements (KSRs)</b>	
Add roads/transport infrastructure, Transport Assessments etc. in relation to Key Site Requirements (KSRs).	Section 2.2.3 concerning the 'Local Policies Plan' has been updated to mention that KSRs may include guidance on site-specific matters such as transport/infrastructure requirements.
<b>Boundary treatments</b>	
Corner sites should require high quality boundary treatments to enhance visual quality in the interests of residential amenity.	In relation to layout considerations, Section 3.1.10 has been amended in relation to the boundary treatment at corner sites.
<b>Spacing</b>	
Consideration should be given to the provision of passage links mid-way in rows of terraces to deter long alleyways for servicing bins.	In terms of 'Spacing', an additional sentence has been added to the end of Section 3.1.11 to include included consideration towards link passages.

## Council response to key issues raised

Main Issue	Council Response
<b>Electric vehicle (EV) charging points</b>	
<p>The SPG could refer to the need to provide space for cycle parking and EV charging stations.</p>	<p>This is outside the remit of the SPG. However, as per DfI's Electric Vehicle Infrastructure Action Plan for Northern Ireland (2022) it is expected "that legislation shall be brought forward, requiring the installation of EV charging infrastructure in new residential...properties...". It is envisaged that this may happen during the current plan period.</p> <p>Section 3.1.11 has been amended to reference cycle and charging facilities as features for which space may be required. An additional bullet point has also been added to Section 3.2.20 to reference EV charging points.</p>
<b>Energy efficiency</b>	
<p>There should be emphasise on how to include energy efficiency in design.</p>	<p>A footnote has been added to the use of renewable energy technologies within Section 3.1.17 to reference the Residential Extensions and Alterations SPG for examples of microgeneration equipment and other renewable technologies which could be incorporated into building designs.</p>
<b>Density</b>	
<p>It is important that infrastructure can accommodate high densities, particularly in affordable housing development, and that any improvements required are agreed at the planning application stage.</p>	<p>The Council accepts that there may be occasions where external requirements may impact on the overall density of development. This is acknowledged within Section 3.1.18 in relation to existing site features and open space requirements. The section has been amended to recognised specific social housing requirements as an influence on density also.</p>
<p>Guidance amounts to leave for ambiguity and is not fit for purpose. It should stop being supplemental and design principles and set densities should be applied as a basic bottom line.</p>	<p>The purpose of SPG is to build upon and provide more detailed advice or guidance on policies contained within the planning policy framework. The guidance within the SPG is therefore appropriate.</p> <p>The Plan Strategy contains Policies DES1 and HOU4. Policy DES1 sets out general urban design principles upon which development should be based. The 'Placemaking and Urban Design' SPG then provides guidance relating to Policy DES1 and the principles of urban design.</p>

Main Issue	Council Response
	<p>Policy HOU4 presents the density bands for residential development to be used as a guide to inform proposed developments within settlement/character areas. While the Residential Design guidance refers to density in broad terms, it is the Council's intentions, as per Appendix E of the draft Plan Strategy, to prepare specific SPG relating to Policy HOU4 and density for residential development.</p>
<b>Backland development</b>	
<p>Refer to the need for backland development to ensure adequate private amenity space and minimum separation distances can be achieved for existing and proposed dwellings.</p>	<p>The first bullet point of Section 3.1.21 has been extended to refer to separation distances as well as privacy and residential amenity.</p>
<p>Amy's House in Elmwood Mews is a good example of backland development.</p>	<p>Although this development provides a useful example of a rear extension in a historic context, this SPG is seeking to address new residential developments, rather than adaptations to existing SPG.</p>
<p>The corner of Wellington Park and Wellington Terrace is a good example of backland development.</p>	<p>While the scheme at the rear of Wellington Park does provide an example of backland development, we have chosen to illustrate the various types of backland development through plot layouts, rather than photographs.</p>
<p>Extend bullet point under section on 'Backland development' to require replacement planting where existing features cannot be retained.</p>	<p>Additional text has been added to bullet point iv. of Section 3.1.21, which requires that 'Backland development' should integrate existing landscape features.</p>
<b>Accessibility</b>	
<p>Direct access onto a street may not always be possible in all circumstances. In some instances, a courtyard or communal area would be accessed prior to arriving at the street.</p>	<p>Section 3.1.83 on the need for residential units to have direct access from a public street has been amended to reflect potential for access via communal public spaces.</p>
<p>There are potential equity issues if communal facilities are only available to private tenants/owner-occupiers and not to those in affordable units.</p>	<p>There is no suggestion within the SPG that communal facilities would be restricted for any residents. It is expected that all communal facilities should be available and accessible to all residents irrespective of tenure. Where required, confirmation of such can be achieved through use of a Section 76 Agreement. Nonetheless,</p>

## Council response to key issues raised

Main Issue	Council Response
	additional text has been added to Section 3.2.20 to provide clarity on this matter.
<b>Conservation/built heritage</b>	
Section 3.1.5 on site characteristics should elaborate on archaeological/built heritage features and the last sentence reworded to ensure language is not open to interpretation.	While the final sentence of Section 3.1.5 is considered lucid, the section has been amended to exemplify features of archaeological/built heritage.
The guidance should refer to viability as a consideration when determining the acceptability of residential development.	In regard to 'Demolition and redevelopment', revisions have been made to Section 3.1.25 and its accompanying bullet point i. in regard to feasibility concerning the reuse, renovation and/or retrofit of existing buildings.
Guidance should mention the sensitivity of listed buildings.	An additional sentence has been added to section on 'Conservation Areas and Areas of Townscape Character' (3.1.26), referring to the setting and sensitivity of listed buildings.
A conservation led approach should be applied to the conversion of listed buildings. Mersey Street school is a good example of such an approach.	While inclusion of an additional image is not considered necessary a footnote has been added to Section 4.1.1 to promote a conservation-led approach to the conversion or sub-division of existing buildings, with reference to Policy BH1.
Guidance should state that reuse, renovation and retrofit of existing buildings is preferable to redevelopment.	Section 3.1.25 and accompanying bullet point i. under the heading 'Demolition and redevelopment' have been amended to reflect this.
<b>Open Space</b>	
<p><b>Public open space</b></p> <p>Explain how green spaces can connect to existing green infrastructure for biodiversity, accessibility.</p>	While the 'Open space' section notes that open space has recreational and social value, as well as helping to promote biodiversity (Section 3.1.54), additional text has been added under 'Layout considerations' at Section 3.1.7 to make this more explicit.
There should be a preference for green open space as this is proven to provide mental health and wellbeing benefits.	The Council agree that green open space is beneficial for a number of reasons, including mental health and wellbeing. The section on 'Public open space' already acknowledges that open space should include landscaped and planted areas to help green an area, but also acknowledges that it is has social value. There is also a significant emphasis placed on the retention of existing mature trees and hedgerows,

## Council response to key issues raised

Main Issue	Council Response
	alongside replacement planting where this is not possible. The existing text, alongside a number of subsequent amendments is considered sufficient in this regard.
Reference should be made to shading which is an important consideration in the context of global warming.	In regarding to 'Public open space', Section 3.1.55 has been amended to state consideration should be given to appropriate landscape design interventions intending to provide exterior shelter.
Include reference of the need to provide space and facilities which help meet the needs of young people/teenagers and children of different abilities.	The section on 'Open Space' (3.1.59) has been amended to require play areas, where provided, to be suitable for children of all ages and abilities and that consideration should be given towards the needs of adolescents.
Guidance should reduce inequality of access to natural and recreational space.	The section on 'Open space '(3.1.54 to 3.1.59) is considered appropriate to open space provided as part of new residential development schemes and sufficient in promoting space that is accessible to all users. Nonetheless, 'accessible' has been added to the general requirements of open space referred to in Section 3.1.55.
Consideration should be given to the design of outdoor furniture to age-friendly standards.	The section on open space has been updated at Section 3.1.58 to include broad requirements that any seating provided is of age-friendly design.
<p><b>Landscape design</b></p> <p>There should be a requirement for compensatory planting where existing trees/hedges are removed.</p>	Additional text has been added to the sections dealing with 'Open space' (3.1.55) and 'Landscape design' (3.1.60) to include requirements for compensatory planting.
Reference the use of wildflower meadows and planting of native species to promote biodiversity.	Wildflower meadows and native species have been added to the hierarchy of different types of planting mentioned in the section on 'Landscape design' (3.1.61).
<p><b>Private open space</b></p> <p>In relation to private open space, reference should be made to other communal areas and revisions should be made to refer to the provision of private patio or garden areas, where possible.</p>	Sections 3.1.64 and 3.1.65 have been updated as per these suggestions, including reference to terraces, roof terraces/gardens, internal courtyard areas and winter gardens.
Minimum sizes for balconies are large and deter inclusion.	The suggestion regarding balcony sizes warrants minor amendment. The table referring to minimum floor areas for apartment balconies has been removed and Section 3.1.66 in relation to 'Private open space' has been revised to reference

## Council response to key issues raised

Main Issue	Council Response
	'BS 8579: Guide to the design of balconies and terraces', and requirements for a minimum 1500mm turning circle and 300mm projection either side of sliding doors for accessibility.
<b>Sustainable drainage systems (SuDS)</b>	
It is unclear if SuDS area are areas of flood mitigation or open space. SuDS ponds could form part of open space calculations.	Section 3.1.56 in relation to 'Public open space' has been amended to provide clarity on this issue.
A stronger emphasis on SuDS could be included in Section on density (3.1.17).	This is not considered necessary within this section. Links to appropriate documents are provided and reference to SuDS is also provided in the section of 'Surfacing' (3.1.70 to 3.1.75).
<b>Standards</b>	
<p><b>Space standards</b></p> <p>Consider if there is a need for prescriptive design standards when covered through other legislation or statutory requirements.</p>	In relation to 'Residential space standards', the desirable standards for room types have been removed with reference now made to HAG at Section 3.1.78. Minimum space standards for balconies have been replaced by additional guidance added to Section 3.1.66.
Consideration of costings for increased ceiling heights should be made.	While Section 3.1.80 encourages higher ceiling heights in regard to 'Residential space standards', it is not a policy requirement. Rather, the section outlines the benefits of considering greater heights to the perception of space and large openings/windows to enable greater light penetration. Many developments will already incorporate such measures as a form of best practice, and the Council does not consider it necessary to revise the guidance.
Well-designed entrance lobbies and communal spaces should be a requirement rather than a minimum floorspace requirement.	The minimum of 10% is consistent with recent apartment approvals and therefore the Council consider it to be an appropriate standard for future development.
<p><b>Road standards</b></p> <p>There is a need for updated guidance in relation to road standards/design.</p>	This is outside the remit of the LDP.
Consider adding that retaining structures which affect roads will generally require Technical Approval from Dfl.	A footnote linked to Section 3.1.6 which deals with 'Site characteristics' has been added to inform that technical approval from Dfl may be required in instances where retaining structures affect roads.

## Council response to key issues raised

Main Issue	Council Response
State that redundant access (to the public road) should be closed and reinstated to the satisfaction of the roads authority.	An addition sentence has been added to the section on 'Demolition and redevelopment' (3.1.24) to reflect this suggestion.
Advise that any surfacing submitted for adoption must be acceptable to DfI Roads.	The section on 'Surfacing' (3.1.71) has been updated to include this advice.
<b>Management arrangements</b>	
It is uncertain how a restriction of roof access to adults only could be enforced.	Specific issues around access arrangements can be addressed through a management plan. In relation to communal spaces, Section 3.1.68 has been updated to reflect that any restricted roof access will be in accordance with an agreed plan.
Requirements for management arrangements should be for all apartment developments regardless of size or unit numbers.	The requirement for management arrangements in respect of apartment developments over 30 units is set by criterion i. of Policy RD1. This threshold reflects the fact that management arrangements are unlikely to be viable for smaller scale developments.
<b>Natural light/daylight</b>	
Text on natural light is best practice, but it may not always be possible. Design parameters for main rooms facing northwest/north/northeast could safeguard access to natural light.	In relation to 'Natural light', amendments have been introduced through changes to Section 3.1.87 and its accompanying first bullet point. Addition Sections 3.1.88 and 3.1.89 have been added with reference to the latest edition of the BR 209 on Site layout planning for daylight and sunlight: a guide to good practice.
<b>Retrofitting</b>	
There should be an incentive for retrofitting and developing disused spaces to aid city centre living and the night-time economy.	Retrofitting of houses is addressed through Policy RD2 of the Plan Strategy and guidance is provided within the related Residential extensions and alterations SPG. The appropriate conversion and/or re-use of existing buildings is encouraged through Policy HOU3, with additional guidance already provided within Section 4 of this SPG.
<b>Disability requirements</b>	
Guidance should reference kitchen surfaces/cupboards that are accessible to wheelchair users and should recognise that spilt-level dwellings may be problematic in meeting accessible housing standards	Accessible kitchen surfaces/cupboards are outside the remit of the LDP, but the accessibility criteria within the policy do not preclude installation of such fixtures. Nor do they preclude the use of stairs or other forms of vertical transportation. The requirements of the policy can be fulfilled through

## Council response to key issues raised

Main Issue	Council Response
	design solutions which respect topography and user needs.
The guidance seems to indicate all wheelchair housing must meet Appendix C space standards, but turning circles and room sizes are not mandatory	Room size space standards have been removed from the SPG, but the requirement for 10% of units to be wheelchair accessible is applicable across 10% of all tenures. In relation to 'Wheelchair standards', Section 5.3.2 already clarifies that the full wheelchair standards from the HAG are only applicable to social houses. Section 5.3.3 has been amended to remove reference to remove reference to the DfC's HAG design standards for wheelchair housing.
The guidance should consider the number of disabled spaces required and if such parking should be within a defined distance of the building.	Guidance on the number of disabled spaces required is outside the remit of the SPG. However, within the section on designated parking, section 5.3.9 has been expanded to clarify that the route to the entrance from any reserved spaces should be accessible, clearly defined and well lit.
Standards for turning circles should be changed to a minimum of 1800mm.	NI Building Regulations require a minimum 1500mm diameter. The guidance is consistent with this statutory requirement and will be reviewed should it change. This does not preclude the provision of larger turning circles.
Wet rooms should be added to the section on Turning Circles.	Section 5.3.15 has been amended to included reference to wet rooms as well as bathrooms.
<b>Terminology</b>	
The SPG on Affordable housing and housing mix uses the term 'wheelchair adaptable' whereas the SPG on Residential design (including adaptable and accessible accommodation) uses the term 'wheelchair accessible'. It is unclear if the terms are being used interchangeably.	Policy HOU7 refers to both 'adaptable' and 'accessible' accommodation. The introduction to the additional wheelchair requirements uses the phrase 'wheelchair accessible'. As noted in Section 5.3.2, it is not a requirement for full wheelchair housing, but rather for some accommodation that is more easily adapted for wheelchair use in the future. The phrasing within the SPG on Residential design (including adaptable and accessible accommodation) is consistent with the Plan Strategy policy. However, the terminology used in the SPG on Affordable housing and housing mix will be reviewed to ensure consistency.
<b>Text/image suggestions</b>	
The Introduction should reference statutory consultees.	Section 1.0.2 of the 'Introduction' to the SPG has been updated to refer to statutory consultees.



Main Issue	Council Response
Suggest replacing image under Section 3 header with a completed example.	It is not considered necessary to change the image used under Section 3 as new housing under construction is equally as valid as completed housing.
Annotation should be added to Figure 3.1 to highlight examples of the characteristics of established residential areas.	Descriptive text has been added to Figure 3.1 to identify key characteristics illustrated by the figure ground maps and photographs.
Instruct that a topographical plan, site levels and elevation details of retaining structures will be required to determine if proposals are acceptable.	Additional sentences have been added to the section which deals with 'Site characteristics' (3.1.6) to include these requirements.
Replace Figure 3.3 with example showing good treatment of corner sites with units from junction of Limestone Road and Clanchatten Street.	Figure 3.3 provides contrasting good and bad examples of quality residential layouts and is not intending to show treatments of corner sites. There is therefore no need to update this imagery.
Guidance could state that a mix of house types assist with creating balanced communities and mixed tenure.	The suggested guidance has been added to the beginning of the section on 'Form, materials and detailing' (3.1.14)
<b>Links and references</b>	
Refer to Strategic Planning Policy Statement for Northern Ireland (SPPS) Paragraph 4.24 on Good Design.	In terms of 'Policy Context', Section 2.1.5 has been added to refer to this paragraph of the SPPS.
Refer to the need to consult specific Conservation Area guides for designated areas.	Under the 'Local planning policy' heading, Section 2.2.4 has been added to inform that a series of Conservation Area design guides are available for reference.
Guidance should refer to Creating Places and Private Streets Determination (PSD) throughout.	Creating Places is appropriately referenced in the section on 'Accessibility' (3.1.47 & 3.1.49). An additional footnote has been added to Section 3.1.49 in regard to meeting technical requirements.
It's important the SPG recognises Housing Associate Guidance (HAG) standards are a requirement for funding in considering proposals for social housing schemes. Such standards could be included as appendices.	This is acknowledged within Section 3.1.77 in relation to 'Space standards', and on numerous occasions within Section 5 in terms of 'Accessible and adaptable accommodation'. It should be noted that this issue is addressed more fully within the Affordable Housing SPG. However, to ensure that this is more explicit, specific acknowledgement of it is added to Section 1.0.5 in the 'Introduction' to the SPG.
Guidance should recognise that residential design guides (e.g. HAG) do not apply in all circumstances.	The Council is satisfied that this is widely recognised, but also that such understanding is facilitated in relation to 'Adaptable Housing' by

## Council response to key issues raised

Main Issue	Council Response
	Section 5.1.2 and Table 2 which specifically relate HAG requirements for lifetime homes and wheelchair accessible standards for social housing.
<b>Decision-making</b>	
<p>The 2021 NI Audit Office Report was a damning review of a system which is slow. Policy needs to be supported by timely planning decisions.</p>	<p>The Council understands the need for timely planning decisions, but the issue is beyond the scope of SPG. The Council is committed to continuous improvement in all of its services. However, there are a significant number of issues raised in relation to the planning system as a whole in the 2021 Report and the associated Public Accounts Committee Report in 2022; many of which are beyond the control of the Council. Nevertheless, the Council continues to work with all partners to make the planning process as efficient and effective as possible.</p>

## Residential extensions and alterations

### Summary of Responses

Five respondents made representations in respect of the Residential extensions and alterations SPG. Of the comments submitted:

- Additional **benefits** of extensions were outlined;
- The need to reference **design quality** was raised;
- Two respondents felt the guidance was **too prescriptive**;
- Some requested additions to the **directory of agents** in Section 2.6;
- A number of responses highlighted potential **conflicts** or contradictions within the guidance;
- Three issues were raised in relation to guidance on **scale, massing and design**, including references to subordinate design and impact of side extensions on composition of properties;
- Comments on **materials and detailing** related to heritage significance and details of older properties;
- New wording was suggested for to help identify **established residential character**;
- Some made recommendations in relation to expectations where extensions affect the **setting of a listed building**;
- Clarification was sought in relation to the use of **terminology**, most notably in terms dominance relating to both overbearing massing and overlooking;
- Comments highlighted potential contradictions between reference to **boundary treatments** in some localities in comparison to the type of boundaries that historically formed an aspect of the character of the area;
- It was considered necessary for the guidance to state that advice and permissions should be sought prior to undertaking **energy efficiency enhancements** and any such enhancements should be sympathetic to the property; and
- **Retrofitting** was highlighted as an issue where the Council could assume a role in calling for a retrofit strategy and the plan could consider retrofitting of existing properties.

### Responses Received

Reference	Respondent
SPG-R-02	Anonymous - Respondent No 2
SPG-R-03	National Trust
SPG-R-04	MAG for Architecture and the Built Environment

Reference	Respondent
SPG-R-19	Individual - Neil Mathews
SPG-R-20	DfC - Historic Environment Division

## 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>	
The requirement for Listed Building Consent in Section 2.5 is welcomed.	The Council welcomes support for this aspect of the SPG.
<b>Benefits</b>	
Extensions are of benefit, enabling people to remain in their homes, reducing the need for new development, requirements for additional infrastructure and unnecessary environmental impact.	Section 1.0.3 in the 'Introduction' to the SPG has been extended to greater reflect the benefits of extensions.
<b>Design quality</b>	
Section 2.1 should include reference to design quality.	Although design quality is addressed throughout the SPG, it is considered that there is merit in specifically highlighting this as part of the 'Factors to consider when planning to extend a home' in Section 2.1. An additional bullet point beneath Section 2.1.1 has been introduced which is based on the design elements addressed in Section 4.3 which relates to 'Established character and residential amenity'.
<b>Too prescriptive</b>	
The guidance is too prescriptive in a number of places, particularly in respect of distances quoted and leaves little room for design quality, with concerns that the opportunity for good design is lost in the endeavour to avoid bad design.	While the Council disagrees that the guidance is too prescriptive, it has nonetheless added flexibility to Section 4.1.4 in relation to required distances in respect of set back and set down. The Council considers that Sections 4.3.15 – 4.3.16 and Section 4.3.40 provide sufficient flexibility in regard to distance from gable walls and neighbouring boundaries. In addition to the reference to design quality inserted in Section 2.1, Section 4.2.2 which related to 'External Materials and Detailing' has also been extended to reference aspects of good design.
<b>Directory of agents</b>	
Add additional directories/registers to Section 2.6	Section 2.6.1 under 'Choosing an agent' has been amended to include reference to the RIBA Conservation Register, the Ulster Architectural Heritage Directory of Traditional Building Skills and the Chartered Institute of Architectural Technologists.

Main Issue	Council Response
<b>Conflicts</b>	
The photograph inserted below Section 4.1.2 conflicts with the guidance, with potential to undermine conservation policy guidance.	The photograph previously within the 'Subordinate design' section has been deleted.
The guidance in Section 4.3.34 contradicts tolerance of side extensions elsewhere in the SPG.	Section 4.3.34 under 'Landscaping and boundary treatments' has been updated to remove the text reading "Where important trees and landscape features exist within a site, care should be taken that extensions are not sited too close to them".
<b>Scale, massing and design</b>	
Section 4.1.1 should include reference to depth and eaves as elements of subordinate design.	An additional sentence has been added to the end of Section 4.1.1 to reference the suggested elements of subordinate design.
Section 4.1.2 should state it is best practice to locate and extensions to the rear.	An additional sentence has been added to the 'Subordinate design' section (4.1.2), to suggest in many cases the most appropriate location for extensions is to the rear, particularly in Conservation Areas. The text following the insertion has been moved to new Section 4.1.3.
The guidance should reflect the impact of a proposed extension on the balance and the symmetrical composition of the existing property is often a consideration in terms of character.	Section 4.1.7 has been updated to include these sentiments made in regard to 'Side and front extensions'.
<b>Materials and detailing</b>	
Section 4.2.1 should inform that heritage significance may influence the approach to be adopted in adding to an existing property.	The Section on 'External Materials and Detailing' has been updated to reference the influence heritage significance has on the approach to be adopted in regard to extensions.
Guidance in Section 4.2.7 relating to older properties is incorrect.	Section 4.2.7 has been deleted, with example features (i.e., interesting arches, brick detailing and ornamentation) added to Section 4.2.5 concerning 'External Materials and Detailing'.
<b>Established residential character</b>	
New wording in the form of 'but generally within an overall coherence' should be added to Section 4.3.2.	The suggested wording has been added to the final sentence of Section 4.3.2 relating to 'Established residential areas'.
<b>Setting of listed buildings</b>	
Guidance at Section 4.3.4 should set out that expectations will be higher where extensions affect the setting of a listed building.	Guidance has been updated to reference the setting of listed buildings. However, it is not considered necessary to state that expectations will be higher where extensions affect the setting of a

## Council response to key issues raised

Main Issue	Council Response
	<p>listed building. The second half of Section 4.3.4 already states the Council will consider other policies within the Plan Strategy including Policies BH1-BH4, which set out specific criteria for new development affecting listed buildings, heritage assets and the wider built environment.</p>
<p><b>Terminology</b></p>	
<p>To avoid confusion with dominance in terms of massing, might not the term 'Overbearing Factor, be more appropriate for Section 4.3.18</p>	<p>The words 'in the sense of being overbearing' have been added to Section 4.3.18 to assist with in bringing clarity to the section on Dominance.</p>
<p><b>Boundary treatments</b></p>	
<p>Timber boarding (with masonry plinth piers) is a characteristic boundary in some areas. It might be useful to add to Section 4.3.38 new wording in the form of 'unless it can be demonstrated that this type of boundary historically formed an aspect of the character of the area'</p>	<p>In regard to 'Landscaping and boundary treatments', Section 4.3.38 has been revised to accommodate the suggested wording.</p>
<p><b>Energy efficiency enhancements</b></p>	
<p>Welcome the guidance set out in the SPG but would like to see more emphasis on how energy efficiency and biodiversity measures can be appropriately incorporated into new residential extensions and alterations.</p>	<p>The SPG already seeks to encourage consideration of energy efficiency measures when undertaking extensions/alterations to an existing property. Notwithstanding, we have extended this through the addition of new Sections 4.5.4 and 4.5.5 relating to 'Energy efficiency' which highlight factors to be considered in retrofitting and two approaches by which retrofitting can be achieved. The text relating to 'Biodiverse, living or green roofs and walls' under Section 4.5.9 has also been extended in regard to energy efficiency and biodiversity. With specific regard to biodiversity, Sections 4.3.34 and 4.3.36 have been extended with additional text provided to encourage the retention of front gardens, the use of native planting and the incorporation of features to enhance wildlife.</p>
<p><b>Retrofitting</b></p>	
<p>A multi-agency approach to retrofitting is needed. BCC could call for a retrofit strategy including some basic changes.</p>	<p>This is outside the scope of the SPG. However, the Council agrees with the comment made and is actively working with key partners to help boost retrofit activity across the public and private housing sectors in Belfast. For example, the Council is working closely with FMB and NIHE, as well as</p>

## Council response to key issues raised

Main Issue	Council Response
	other partners, through the Belfast Retrofit Hub and has established career development opportunities through the Belfast Retrofit Employment Academy.
The plan could consider retrofitting for existing properties and opportunities at this stage to encourage green/energy efficiency initiatives.	Refer to Council's response under the 'Green initiatives' issue which references the introduction of new Sections 4.5.4 and 4.5.5.
Advice/guidance alongside necessary permissions/consents should be sought from experienced consultants before undertaking energy efficiency works and any measures introduced should be sympathetic to the building fabric, age and construction.	The Council agree with the comments raised and has amended the SPG accordingly (refer mainly to Sections 4.5.3 and 4.5.7). In relation to measures being sympathetic, we believe that this applies to all forms of energy efficiency retrofitting, hence amendments to Section 4.5.3 alongside the expansion of text relating to the bullet point on Airtightness and Insulation under Section 4.5.6.

### Placemaking and Urban Design

#### Summary of Responses

Seven respondents made representations in respect of the Placemaking and Urban Design SPG. Of the comments submitted:

- **Support** as useful resource in development of public realm schemes, its recognition of the importance of heritage/natural assets and its holistic approach to sites.
- Several suggestions that **additional imagery** be inserted across document to assist in visually illustrating various sub-components of the policy.
- Include **definitions/descriptions** of technical references to provide further clarity.
- Further detail/clarification/reordering in relation to **Case Studies**.
- Reference made to **desire lines** and how they can assist in reinstating local routes.
- Recommend **additional labelling** be added to street section graphics.
- Reference challenges in public realm facing those with **physical and mobility needs**.
- **Inclusive design and natural surveillance** sections should be separated.
- Reference made to **traditional narrow plot widths** and their ability to create diversity of land uses and increased active frontages.
- Insertion of a graphic illustrating **passive design** would be useful.
- Emphasis to be placed on **demolition of existing buildings** being treated as the exception and not the norm and supplemented by appropriate justification.
- Reference **parking availability / areas of parking restraint** in contextual studies.
- Suggested that **Service Management Plans** may be required to control external storage areas for waste management.
- Reference to **Living Places, listed building database and conservation area guides**.
- **Discourage use of cul-de-sacs** which hinder connectivity and fail to promote legibility.
- Well designed streets enable **natural surveillance**.
- Encourage developers to consider a **comprehensive approach** to sites and integrate development with wider context.
- Consideration to be given to **restorative urbanism** that puts mental health and social wellbeing at the heart of the design process.
- Highlight importance of **designing for an aging population** to improve health, wellbeing and reduce isolation.
- Greater emphasis on the need for development to meet **play needs of children**.
- More emphasis to be placed on the additional resources required to counteract the **impacts of bad design** when dealt with retrospectively, including examples (CQ).
- Reference **lighting, surface materials and kerb heights** in relation to public realm.
- Insert link/reference to **concept of 15 minute cities**.
- Consideration of **DDA requirements and building regulations** for parking areas.
- Developments need to **prioritise needs of children and residents** over vehicles.
- Further detail on **green solutions for parking** including SuDS.
- Car movement should be reactive to **traffic volume**.
- Guidance is **not fit for purpose** and amounts to leave for ambiguity.
- Role of **Landscape Visual Impact Assessment/Landscape Architect**.
- **Community engagement** should be taken in parallel with design development.



Responses Received

Reference	Respondent
SPG-R-03	National Trust
SPG-R-04	MAG for Architecture and the Built Environment
SPG-R-14	DfC – Streets Ahead
SPG-R-17	IMTAC

Reference	Respondent
SPG-R-21	NI Housing Executive (NIHE)
SPG-R-27	DfI - Roads (DfI – DP/TPMU/TICC)
SPG-R-31	Individual

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

Main Issue	Council Response
<b>Support</b>	
Belfast Regeneration Directorate (Public Realm Teams) have reviewed draft SPG on Urban Design and Placemaking. Guidance will prove a useful resource in development of current and future Public Realm schemes within the Belfast area and we would be keen to include its advice and guidance. Found guidance to be informative and generally well presented and attached appendix containing some minor points for consideration.	The Council welcomes support for the SPG.
MAG is supportive of this guidance – it is well written and clearly set out, encouraging applicants to look at the site holistically and in the context of its place in the city.	The Council welcomes support for the SPG.
We (National Trust) welcome the approach set out in the SPG, particularly recognition of the importance of the city’s heritage and natural assets; opportunities to protect and enhance these and better connect the city through blue and green infrastructure; and the importance of protecting the setting of built heritage assets. We welcome the focus on principles of good design as set out in the document and support maximising energy efficiency of buildings.	The Council welcomes support for the SPG.
As the Home Energy Conservation Authority, the Housing Executive welcomes the promotion of energy efficient measures, passive design, renewable energy schemes and sustainable construction techniques and material in new developments as they can reduce fuel poverty for local people, thereby increasing health and	The Council welcomes support for this aspect of the SPG.

## Council response to key issues raised

Main Issue	Council Response
wellbeing and assist with reducing harmful emissions and achieving net zero.	
<b>Additional imagery</b>	
It would be very useful to include photographs of precedent projects alongside text showing consideration of context and character beyond the physical attributes to include the historical, social and cultural context etc. Demonstrating visually how this is done well with photographs of projects will help explain how to actually use this guidance when designing buildings or assessing the design as a submitted planning application.	Further consideration has been given in relation to additional imagery, their placement and new supporting text. New images relating to contextually appropriate infill (Cornmarket) and sensitive extension to heritage asset (Former St Malachys Convent) have been inserted alongside descriptive text.
These sentences (second and third sentences - paragraph 4.1.12) are good because they actually explain how to use this guidance when designing buildings or assessing the design as a submitted planning application. However it would be good if this was backed up with images or diagrams alongside the text to help further explain it visually.	Further consideration has been given in relation to additional imagery, their placement and new supporting text. New images relating to recently constructed and contextually appropriate residential development (Lisburn Road/Tates Avenue) have been inserted alongside descriptive text.
The concept of sense of place is often ignored, misunderstood, or misconstrued in design. Can this be further explained with photographs alongside the text of streets and spaces showing good examples of spaces with a sense of place?	Further consideration has been given in relation to additional imagery, their placement and new supporting text. New image relating to vibrant and active spaces (Commercial Court) has been inserted alongside descriptive text.
Enclosure and Defining spaces. Some diagrams showing street sections or 3D models of city centre squares and streets would aid in explaining how enclosure and the definition of space can be manipulated to impact the feeling of enclosure within an urban space and how this in turn impacts on a sense of place.	To provide further clarification in relation to the issues of enclosure and defining spaces, reference has now been made in paragraph 4.3.5 to the series of typical street sections and accompanying text which are included in Section 4.8.
Photographic examples of different boundary treatments would be useful here (paragraph 4.3.11 relating to private spaces).	New images and descriptive text have been inserted after paragraph 4.3.9 (formerly 4.3.11) which illustrate different types of residential boundary treatment.
In addition to the siting of street furniture already mentioned, street lighting should also be included. It would also be good to include photographs of good public realm showing the impact of different materials on the feel of the	Additional day and night images of external spaces associated with Victoria Square now included to highlight importance of street lighting and the impact that different materials can have on the public realm.

Main Issue	Council Response
space and how good siting of street furniture can impact positively on users.	
<b>Definitions/descriptions</b>	
Second sentence "Shoulder heights and palette of materials". What are shoulder heights? Does this mean eaves height?	Footnote inserted which states "The building shoulder height, is the sheer height of a building at the back of the footway up to the eaves or parapet height. It is recognised that many buildings may have one or more additional storeys above this height as a set-back element."
The description of the image is not finished..."within a larger urban area the scale of development may...?"	Image 11 text amended to read "The scale of development should be influenced by existing context. At a local level this may be well established and relatively consistent, however within a larger urban area the scale of development may vary from block to block whereby a more detailed assessment will be required on a case by case basis."
<b>Case Studies</b>	
Case Study 1 - How does the design "relate to the unique context of the surrounding Malone Conservation Area whilst also carefully considering the constraints of a sloping site and distinctive scale and grain of the immediate surroundings"? Explaining or showing how would be a great demonstration to designers of the specific considerations to have or look out for when designing to further enhance place making and urban design.	Case Study 1 text amended to read "Shortlisted for the RSUA Design Awards 2020, the building design responds to the unique context of the surrounding Malone Conservation Area whilst also carefully considering the constraints of a sloping site which saw a level fall of eight meters. The finished design respects the scale and grain of surrounding streets with a glazed atrium allowing daylight to penetrate all levels of the building"
Perhaps case studies should be placed alongside the principles of urban design which they relate to for better explanation.	Placement of Case Studies retained at end of Section 4.2 as each covers multiple urban design principles (format followed elsewhere in document).
Red Box. "DES1". Is this still within Policy DES1: Principles of Design? Title is unfinished	The DES1 box referred to is repeated in part above each subcomponent of the policy throughout the document.
<b>Desire lines</b>	
Reference should be made to 'desire lines' with an explanation of them. These paragraphs are already alluding to that with such statements as "Developments should focus not just on the functionality of the movement of people...but also on how they can enhance the character	Paragraph 4.3.2 amended to include additional line that states: "Consideration should be given to any established 'desire lines' which are often evident where pedestrians or cyclists have worn a path between two points to minimise the

## Council response to key issues raised

Main Issue	Council Response
<p>and local distinctiveness of their area.” And “New development should...reinstate locally distinctive routes and connections”.</p>	<p>distance they have to travel or to create a route that is more convenient in other ways.”</p>
<p><b>Additional labelling</b></p>	
<p>To what principles of urban design do these images relate? Is it Context and Character or Sense of Place or both? This is not clear. Perhaps each image should have in bold what principle of design it is explaining. The descriptions given do not actually explain very well what point the diagram is trying to show. For example what use is image 9 in informing designers about Context and Character or Sense of Place? It merely seems to be pointing out the obvious. In Image 10, is this an analysis of two different scales of development? Again, this is not made clear. How does the image graphically relate to what the description states about scale? Further explanation is needed and should mention rhythm and proportion of the built elements highlighted on the buildings’ façades in the images. In Image 11, how does this diagram graphically explain differences in context between the local level and a “larger urban area”? Why are these images grouped together at the end and not alongside the text to which they relate to complement the explanatory text?</p>	<p>Further detail provided in relation to new labelling, descriptive text and images to provide further clarification. Additional imagery has also been included which illustrates the rhythm and grain of both traditional and contemporary residential streets across Belfast alongside new descriptive text.</p>
<p>Breakdown of topographies not clear, should be better labelled (Para 4.8.5 Image 20).</p>	<p>Additional labelling now added to relevant images.</p>
<p><b>Physical and mobility needs</b></p>	
<p>Further mention on consideration of physically impaired and disabled people, visually impaired and blind people, deaf people and also people with dementia should be included. Ideally with images of how these users needs can be accommodated.</p>	<p>Paragraph 4.5.6 amended to read “Collaborative engagement with a variety of stakeholders at the beginning of the process can contribute to the overall success of a development. To ensure a holistic approach to inclusive design, the input from users with mobility needs and their associated organisations will be crucial. A community involved from the initial concept will take pride and ownership when it comes to completion and the subsequent upkeep and maintenance thereafter.” Paragraph now</p>

Main Issue	Council Response
	included within separate 'Inclusive Design' section.
<p>Specific reference should be made to disabled people and their organisations as key stakeholders in collaboration on inclusive design.</p>	<p>Paragraph 4.5.6 (now 4.5.3) amended to read "The form and appearance of buildings and spaces can contribute to a sense of inclusion and cohesion. Proposals will be encouraged to provide consistent high-quality design to ensure the 10 qualities of positive placemaking are embedded throughout the process. Features that could create actual or perceived barriers, or contribute to segregation, will not be considered acceptable by the council. Collaborative engagement with a variety of stakeholders at the beginning of the process can contribute to the overall success of a development. To ensure a holistic approach to inclusive design, input from people with mobility needs and their associated organisations will be particularly crucial."</p>
<p><b>Inclusive design and natural surveillance</b></p>	
<p>Inclusive Design and Natural Surveillance. Why are both of these themes grouped together? Each is important but they deal with different topics. Grouping them together is confusing. Inclusive design is about consideration for physically impaired and disabled people, visually impaired and blind people, deaf people, people with dementia etc. Natural surveillance is about security, crime, reducing criminal opportunities through design and a feeling of safety. Each topic is very deep and should be treated separately. The section also does not cover in any way the usual considerations for inclusive design such as dropped kerbs at crossing points, tactile paving at crossing points, clear signage, distinctive landmarks to aid memory etc.</p>	<p>Two separate sub-headings have now been established for 'Inclusive design' and 'Natural surveillance' with any relevant text and imagery separated.</p>
<p><b>Traditional narrow plot widths</b></p>	
<p>Reference should be made to narrow plot widths at some point. Creating a diversity of land uses with active frontages is most effectively done on a street where the individual sites bordering the streets have</p>	<p>Paragraph 4.6.1 amended to read "Places that are welcoming and sustainable offer a wide range of uses that help support people to live, work and socialise. They should be well connected to local facilities and the natural</p>

## Council response to key issues raised

Main Issue	Council Response
<p>narrow plot widths. Where a street is bordered with only a few very wide sites with only a few different land uses such as offices or a bank there tends to be the problem of large areas of inactive or dead frontages. Perhaps consideration should be given to taking all necessary means to encourage ground floors of proposals with larger plot widths to be broken up into more narrow plots to encourage a greater diversity of land uses, which lessens the likelihood of dead or inactive frontages occurring.</p>	<p>environment to help improve sustainability, health and well-being. The mix of uses needed to support communities range from education, healthcare, commercial, spiritual, recreational and civic and each play a vital role in the daily activities of people within them. Within well-designed urban communities, mixed use developments can achieve social inclusion contributing to balanced and mixed communities that are accessible for all. New development should seek to reflect surrounding urban grain and where appropriate incorporate narrow plot widths in an effort to achieve a more diverse range of land uses and avoid overly wide and inactive frontages."</p>
<p><b>Passive design</b></p>	
<p>Consideration should be given to providing diagrams to aid with understanding particularly with regards to Passive design strategies which designers have much control over such as form, layout, orientation etc of buildings and public spaces.</p>	<p>New Passive design graphic and accompanying text inserted after paragraph 4.9.6.</p>
<p><b>Demolition of existing buildings</b></p>	
<p>There will be circumstances when it is more appropriate and energy efficient to demolish older buildings and whilst this may not be popular, if it the 'right' thing to do, should it not be featured here as an option for consideration?</p>	<p>Paragraph 4.9.2 amended to read "When considering the energy efficiency of existing buildings, sympathetic reuse and upgrade may often be the most energy efficient option, particularly taking into account embodied energy and the energy required to demolish and build new. The council therefore encourages the responsible reuse, reappropriation and upgrade of existing buildings with any new interventions being sympathetic to the buildings age, character and construction. Cases may exist where it would be deemed appropriate to demolish the existing building, however these should be treated as the exception and not the norm and supplemented by appropriate justification."</p>

Main Issue	Council Response
<b>Parking availability / areas of parking restraint</b>	
Consider adding (to the appropriate bullet point) reference to parking availability and areas of parking restraint.	Paragraph 4.1.5 (Bullet Point 3) amended to read "Reviewing the levels of movement and accessibility of an area; walkability, ease of access to cycle lanes and public transport connections as well as traffic flows, parking availability and areas of parking restraint."
<b>Service Management Plans</b>	
Consider adding reference to Service Management Plans (SMP) – Para 4.6.6 (Active frontages).	Paragraph 4.6.4 (previously 4.6.6) amended to read "Consideration should also be given to the location of external storage areas for waste management. Dedicated and suitably designed areas within the boundary of the development should be identified so as to minimise the amount of dead frontage while avoiding undue clutter along streets and access points. Depending on the scale of development it may be appropriate to include a Service Management Plan (SMP) to cover these areas."
Reference SMP in para 4.11.5 (Parking provision)	Additional line added to end of paragraph 4.11.5 to read "A Service Management Plan (SMP) may be required for larger development schemes and should reference green infrastructure where appropriate."
<b>Reference to Living Places, listed building database and CA guides</b>	
Provide link/reference to 'Living Places – an Urban Stewardship and Design Guide for Northern Ireland' to enable users to easily access the guidance.	Paragraph 3.1.4 amended to read "The qualities highlighted within 'Living Places: An Urban Stewardship and Design Guide for Northern Ireland', are outlined below and should be pursued by all those involved in shaping our urban environment across the city. The Living Places document defines these ten qualities in detail alongside examples of good, successful places and should be referred to within the development management process where appropriate. A copy of the document can be downloaded from the Department for Infrastructure's website."
Hyperlinks could be added to website resources that allow the reader to check if a	Paragraph 3.1.17 amended to read "The quality of urban areas is also outlined through built heritage designations. The city has numerous

## Council response to key issues raised

Main Issue	Council Response
<p>building is listed and access conservation area guides.</p>	<p>listed buildings and monuments, conservation areas and areas of townscape character. These designations are designed to protect and enhance their unique qualities for future generations. The buildings database, which contains records of buildings which have been judged to be of sufficient architectural or historic merit to be surveyed, can be accessed on the Department for Communities website. The many conservation area guides that apply across the city, can be downloaded from the Department for Infrastructures website."</p>
<p><b>Discourage use of cul-de-sacs</b></p>	
<p>Street patterns could discourage networks of cul-de-sacs which tend to encourage car use, hinder connectivity and legibility of a place and limit vibrancy and inclusivity.</p>	<p>Paragraph 4.1.13 amended to read "It is important to point out that there will be areas within the city that lack a sense of place and local distinctiveness due to poor layouts and design that inhibit permeability and inclusivity. In such places, it may be appropriate to create a new sense of place through established urban design principles that sets a precedent for positive placemaking. The use of cul-de-sacs, which hinder connectivity and fail to promote the legibility of a place, should be avoided where possible."</p>
<p><b>Natural surveillance</b></p>	
<p>Surveillance could be added here as a bullet under 4.3.3 that well designed streets and buildings can be orientated to allow for natural surveillance and create a sense of enclosure around public open space etc.</p>	<p>Paragraph 4.3.3 amended to include additional bullet point which reads "Optimise natural surveillance by ensuring the primary elevations of buildings front onto them and that ground floor uses assist in their activation/animation."</p>
<p>Needs to use stronger language, non-activated frontages do not contribute to the streetscape and create empty streets with reduced pedestrian footfall, linked to impact on economy, impact on overall activation of the streets and wider area, encourage antisocial behaviour.</p>	<p>Paragraph 4.5.7 (formerly 4.5.5) amended to read "Large areas of blank facades and inactive frontages do not contribute to the streetscene, create empty streets with reduced footfall, reduce levels of natural surveillance and encourage anti social behaviour and should be avoided. A combination of design features can contribute to how secure an area is including adequate lighting, considered landscaping</p>



Main Issue	Council Response
	and where appropriate the use of appropriate surface materials to establish the primary use of the space, the combination of which will contribute to how well it is used."
<b>Comprehensive approach</b>	
<p>"New development will be encouraged to look beyond the restrictions of site boundaries" this could explain that site boundaries should not preclude the comprehensive design of a scheme that would integrate with land outside the boundaries of the site.</p>	<p>Paragraph 4.3.7 amended to read "Within residential, office and mixed-use schemes, it is important to animate public spaces to provide opportunities for social interaction. Spaces should be clearly defined, overlooked and accessible with new development aiming to break down physical barriers to access and movement and contribute to safe, secure and welcoming environments. New development will be encouraged to look beyond the restrictions of site boundaries so as not to preclude a comprehensive and holistic approach that has the potential to integrate with lands beyond the site (see Masterplanning Approach for Major Development SPG)."</p>
<b>Restorative urbanism</b>	
<p>The design guidance on private residential amenity space could be expanded to include 'restorative urbanism', e.g. amenity spaces where a small proportion of private enclosed amenity (either communal or singular use) is set aside for rehabilitative functions which can be sensory, educational, supportive of better mental health, e.g. planting education and recreation for all ages.</p>	<p>Paragraph 4.3.8 (formerly 4.3.10) amended to read "In general terms, private amenity space should provide a degree of privacy and separation from adjoining public spaces. For the majority of residential developments amenity space will be located to the rear of the development and where possible adjoin onto other private space. However private amenity space can also include balconies within higher density proposals or a combination of private and shared spaces that are accessible to those who can access the property. Consideration can also be given to the incorporation of 'restorative urbanism' that puts mental health and social wellbeing at the heart of the design process. These can include amenity spaces where a small proportion of enclosed space (either communal or singular use) is set aside for rehabilitative functions which can be sensory or educational in nature."</p>

## Council response to key issues raised

Main Issue	Council Response
<p><b>Designing for an aging population</b></p> <p>By 2036 one in four of the UK's population will be over 65 years of age. Designing for an aging population and incorporating 'healthy aging' characteristics to buildings and spaces whereby older people can move more easily and interact with younger neighbours in terms of social support options could improve health and well being and help reduce isolation. For example, older residents assisting young families with surveillance whilst st play in the shared residential setting and in return social interaction can improve older people's interaction fighting loneliness. it has been shown that reducing loneliness and inactivity has profound a profound effect on delaying the aspects of frailty and dementia which are prevalent problems for older people.</p>	<p>New paragraph (4.5.3) added to standalone 'Inclusive design' section which reads "By 2036 one in four of the UK's population will be over 65 years of age. Designing for an aging population and incorporating 'healthy aging' characteristics to buildings and spaces whereby older people can move more easily and interact with younger neighbours in terms of social support options, can improve health and well being and help reduce isolation. Actively catering for the needs of older residents within the design process can help reduce loneliness and inactivity and have a profound effect on delaying the aspects of frailty and dementia, which are prevalent problems for older people."</p>
<p><b>Play needs of children</b></p> <p>The public realm has generally been colonised by vehicular traffic which then makes parks and private residential amenity spaces more critical. Increasingly the Council has moved to prioritise pedestrian use of the city over vehicular use and this is stated clearly in the Belfast Open Space Strategy (BOSS). the SPG could perhaps place greater emphasis on the need for development to meet the play needs of children and the design elements required to foster safe-play in a residential shared space setting. an integrated child-friendly approach reverses the idea that children's spaces should be discreet areas, such as playgrounds, and excluded from other parts of the public realm. creating a 'children's infrastructure' network of spaces, streets, nature and design interventions provides an opportunity to create better cities and better outcomes for all generations.</p>	<p>New paragraph (4.5.1) added to standalone 'Inclusive Design' section which reads "Public realm has generally been colonised by vehicular traffic which makes the need for communal and private residential amenity spaces more critical. Increasingly the council has moved to prioritise pedestrian and cyclist use of the city over vehicular use which is stated clearly in the Belfast Open Space Strategy (BOSS). In this regard, new development should strive to meet the play needs of children and identify the design elements required to foster safe-play, particularly within a residential shared space setting. An integrated child-friendly approach reverses the traditional idea that children's spaces should be treated as discreet areas, such as playgrounds, and be excluded from other parts of the public realm. Catering for a 'children's infrastructure' within the network of spaces, streets, landscape and design interventions, can provide an opportunity to create better</p>

Main Issue	Council Response
	cities and better outcomes for all generations."
<b>Impacts of bad design</b>	
This should be spelled out in even more simplified terms, these spaces attract antisocial behaviour, impact on existing business and residential communities, requiring additional resources to counteract bad design. What about the role of safe by design, engagement with relevant stakeholder ie PSNI?	Paragraph 4.4.3 amended to read "This can be achieved when a space is designed to be flexible and adaptable. Restrictive design and layouts with no connections to main streets and surrounding uses will become underutilised and unwelcoming. Such spaces can attract antisocial behaviour, have a negative impact on businesses and residential communities and can require additional resources to counteract bad design retrospectively."
Cathedral Quarter is given as an example of the city's "...unique and distinctive streets, alleyways and connections that contribute to the permeability of the city". Can examples be given of the "...areas within the city of poor design layouts..." for context?	No action. This is an issue we want to avoid within the SPG as it may highlight particular companies unfairly. We are of the view that best practice examples are sufficient to illustrate examples of good design.
<b>Reference lighting, surface materials and kerb heights</b>	
What about the early discussions of lighting, reference to BCC lighting strategy. How will they respond to the concerns of stakeholders/ the existing community regarding anti social behaviour?	Paragraph 4.4.4 amended to read "The design, layout and choice of materials should complement the character of the surrounding context. An integrated approach should be taken in relation to the design and siting of features within the public realm including seating, signage, bins, railings, cycle storage, surface materials, lighting, kerb heights etc. to ensure that they are carefully coordinated and integrated within the streetscape and avoid undue clutter that can impact upon the ease of movement within these areas. The positive role that lighting can play in addressing potential anti social issues should form part of early discussions in the design process."
Consider adding – surface materials, lighting, kerb heights.	Paragraph 4.4.4 amended to read "The design, layout and choice of materials should complement the character of the surrounding context. An integrated approach should be taken in relation to the design and siting of features within the public realm including

## Council response to key issues raised

Main Issue	Council Response
	<p>seating, signage, bins, railings, cycle storage, surface materials, lighting, kerb heights etc. to ensure that they are carefully coordinated and integrated within the streetscape and avoid undue clutter that can impact upon the ease of movement within these areas. The positive role that lighting can play in addressing potential anti social issues should form part of early discussions in the design process."</p>
<p><b>Concept of 15 minute cities</b></p>	
<p>Link to idea of 15 minute cities? See the Hassell/Irish Institutional Property 'Close to home - exploring 15-minute Urban Living in Ireland'.</p>	<p>Paragraph 4.1.11 (formerly 4.1.12) amended to read "New development should consider the mix and type of buildings, their form, height, scale and massing as well as their proportions, articulation and materials. Where an area is characterised by consistent features such as narrow plot widths, shoulder heights and uniform palette of materials, new development should consider how these features can be interpreted positively within their design approach. Suggested reading includes 'Close to Home: Exploring 15-minute Urban Living in Ireland' produced by Hassell/Irish Institutional Property which is driving an new era of locally-orientated and compact forms of urban development."</p>
<p><b>DDA requirements/building regulations</b></p>	
<p>Considerations on how pedestrians and cyclists move through car parking areas, needs to be highlighted, response to DDA requirements and Part R building regulations.</p>	<p>Paragraph 4.11.1 amended to read "Parking and how it is accommodated within development schemes can have an impact on the overall design quality of a place. Well-designed car and cycle parking will need to be considered as part of most developments within the city. There are a number of design requirements needed when locating safe and integrated parking facilities that prioritise the pedestrian experience so as to avoid creating car dominated streets. Due consideration will need to be given to how pedestrians and cyclists move through parking areas with specific attention paid to DDA requirements and Part R Building Regulations."</p>

Main Issue	Council Response
<b>Prioritise needs of children and residents</b>	
<p>Consideration needs to be given to children moving/playing in these residential areas, how these developments are designed to prioritise residents and children first and reduce the impact of vehicles.</p>	<p>Paragraph 4.11.3 amended to read "Parking facilities should not dominate a development and result in large stretches of dead or inactive frontages that contribute to unattractive environments. They should be designed to prioritise the movement needs of people over cars particularly the needs of those more vulnerable residents including children and the elderly. Consideration should also be given to the use of larger heavy standard tree planting which would reduce opportunities for illegal street car parking and be robust enough to withstand vehicle collisions and anti social damage."</p>
<b>Green solutions for parking</b>	
<p>Give more detail, green roofs, vertical greening, tying in with suds and habitat creation and climate change, reduces heat loss from building, rain water run-off and surface water run-off, flood alleviation, mitigation of air pollutants.</p>	<p>Paragraph 4.11.5 amended to read "Multi-storey car parking facilities within development proposals should also be well integrated, be of high quality design and where possible incorporate green infrastructure. It may also be possible to cater for additional uses within the development to encourage adaptable and sustainable environments that promote compact city living. This could include infrastructure at roof level such as urban agriculture, pocket parks and play in an effort to improve the health and wellbeing of users. In all of the above examples electric charging points should be considered within the layout and design of parking arrangements. SuDS and green roof design solutions should also be considered at an early stage."</p>
<b>Traffic volume</b>	
<p>Second sentence, consider adding – Car movement should be reactive to the speed, volume of traffic and pace....</p>	<p>Para 4.8.3 amended to read "...Car movement should be reactive to the speed, volume of traffic and pace of the street to allow all users to feel safe and secure."</p>

## Council response to key issues raised

Main Issue	Council Response
<b>Not fit for purpose</b>	
<p>Guidance amounts to leave for ambiguity and is not fit for purpose. It should stop being supplemental and design principles and set densities should be applied as a basic bottom line.</p>	<p>The purpose of SPG is to build upon and provide more detailed advice or guidance on policies contained within the planning policy framework. The guidance within the SPG is therefore appropriate.</p> <p>The Plan Strategy contains Policies DES1 and HOU4. Policy DES1 sets out general urban design principles upon which development should be based. The 'Placemaking and Urban Design' SPG then provides guidance relating to Policy DES1 and the principles of urban design. Policy HOU4 presents the density bands for residential development to be used as a guide to inform proposed developments within settlement/character areas. While the Residential Design guidance refers to density in broad terms, it is the Council's intentions, as per Appendix E of the draft Plan Strategy, to prepare specific SPG relating to Policy HOU4 and density for residential development.</p>
<b>Role of Landscape Visual Impact Assessment/Landscape Architect</b>	
<p>What about the role of landscape and townscape character assessment and the role of a Landscape Visual Impact Assessment or Townscape Visual impact Assessment, for buildings of a certain height that are not schedule 1 or 2 but still impact of aspects of existing character it is important to highlight at PAD and highlight the importance of engaging a landscape architect during the early design stages.</p>	<p>Para 1.2.1 (Bullet point 3) amended to read "Applicants and their multidisciplinary design teams (architects, landscape architects, developers and planning consultants), in preparation of applications;"</p>

## Tall Buildings

### Summary of Responses

Eight respondents made representations in respect of the Tall Buildings SPG. Of the comments submitted:

- **Support** received for the guidance regarding relationships with tall buildings and the general wording of the policy.
- Disagree that **City Hospital Tower** is an iconic tall building in Belfast context.
- Disagree that **Grand Central Hotel** is an iconic tall building in city centre.
- **River House** should not be used as an example of a successful repurposing of a tall building.
- The **view north along Oxford Street** (to Obel Tower) not considered a good example of a visual stop compared to the BT Tower on May Street.
- Disagree that the Obel adds to the **Belfast waterfront skyline** and that the riverfront was a cluster destination.
- Suggested that the **use of greenery** also contributes to improved frontage to the river.
- Several responses suggested that the identification of **formalised key views** would provide clarity and in their absence suggest that the SPG is premature.
- **Sunlight/daylight** assessments welcomed.
- Maximising access to **sunlight/daylight** in tall buildings should aim to maximise residential amenity for residents (both social and private tenure).
- Submission of a **fire strategy** should be required for all tall buildings.
- **Junctions between buildings** should be sympathetically considered.
- **Contradictory wording** of policy (DES3 Tall Buildings).
- The establishment of an independent **Design Review Panel** could be beneficial to the overall process.
- Several responses sought clarity as to whether a **Tall Building Design Statement** was over and above the legislatively required Design and Access Statement.
- Several responses highlighted that SPG should acknowledge importance of tall buildings in areas where **regeneration** is ongoing and not just in neglected areas.
- Council should provide **clarity on supporting documentation** to support applications.
- Several responses considered the requirement for **traditional tripartite ordering** as a 'fundamental principle' to be too onerous.
- Several responses suggested that **viability** should be taken into consideration when considering re-use vs. demolition.
- Several responses highlighted that requiring **high quality public realm** to enhance the setting of a tall building may create difficulty if the full extent of a red line boundary has the potential to require land beyond control.

## Council response to key issues raised

### Responses Received

Reference	Respondent
SPG-R-03	National Trust
SPG-R-06	Belfast Civic Trust
SPG-R-13	Bywater Properties, Southbank Square, MRP & Wirefox

Reference	Respondent
SPG-R-21	NI Housing Executive (NIHE)
SPG-R-24	Belfast Harbour
SPG-R-25	Titanic Quarter Ltd
SPG-R-26	Lacuna Developments
SPG-R-28	Swinford Sirocco Ltd

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

Main Issue	Council Response
<p><b>Support</b></p> <p>We (National Trust) welcome the introduction of policy criteria for tall buildings particularly with regards to their relationship with listed buildings (e.g. the Crown), Conservation Areas, Areas of Townscape Character (ATCs) and historic monuments/gardens. Respecting key public views and vistas is also supported. We also welcome 5.2.1 of the SPG which states that tall buildings will be required to preserve and where possible enhance the setting of listed buildings, conservation areas, areas of townscape character and historic monuments/gardens. We support directing tall buildings to existing established clusters or to accentuate key vistas or emphasise areas of civic or visual importance. But only limited areas should be identified in the Local Policies Plan in order to preserve Belfast's attractive unique feature as a low lying city.</p>	<p>The Council welcomes support for the SPG.</p>
<p>Whilst we (Bywater Properties) envisage that the wording of the policy will be adopted unchanged, we welcome the expanded text of the tall buildings SPG which sets out that standalone Tall Buildings may be considered acceptable, subject to meeting the other criteria contained within DES 3. Accordingly, we do not make any suggested amendments to the content of this SPG, in this regard.</p>	<p>The Council welcomes support for the SPG.</p>



Main Issue	Council Response
<p><b>City Hospital Tower</b></p> <p>Image 3 - City Hospital Tower                      Illustrates the 15 storey high City Hospital Tower and states "a Belfast Landmark with its bold form and recognisable yellow facade that contributes to the sense of place and local distinctiveness". We cannot understand the insertion of this image of the City Hospital Tower block as a "building of bold form.....that contributes to the sense of place and local distinctiveness". This is contrary to clause 4.1.2 which states "Tall Buildings do not need make an unnecessarily loud statement, nor should every tall building be designed as an iconic flagship or landmark building". This building bears no resemblance to the Belfast vernacular (red brick and Victorian/Edwardian buildings including red brick warehouses and mills). The Hospital Tower is out of scale in height and massing to the rest of the city. We would argue it has a negative effect architecturally. It is domineering and interferes with views to the Belfast Hills. Better examples of tall buildings to be used would be the student blocks near the university of Ulster. See attached. These employ red brick and rendering to fit in with the area. They emphasise the horizontal rather than the vertical and are a closer reflection of the city generally. We think these buildings could be used in Image 3.</p>	<p>With its distinctive yellow accenting that complements the Harland &amp; Wolff cranes, the City Hospital Tower does dominate the skyline of Belfast. Rising to 15 storeys (76m) and designed by Louis Adair Roche, this landmark yellow building has long divided opinion among the city's inhabitants since opening in January 1986 with views split between it being an eyesore or a brutalist masterpiece. The building is of its time, is very distinctive to the city having achieved an iconic status in its own right and its reference within the Tall Buildings SPG is considered appropriate.</p>
<p><b>Grand Central Hotel image</b></p> <p>We disagree with the use of the word "iconic" in the description of the building in Image 5. Again this building is not in the context of the Linen Hall conservation area. Whilst the cladding is an improvement the new Library at Queens is a better example of repurposing in context with a conservation area.</p>	<p>Image 5 text amended to read "The reimagining and refurbishment of the landmark 1970s Windsor House into a 4-star 300 bed signature hotel that sits more comfortably within the context of the historic Linen Quarter."</p>
<p><b>River House image</b></p> <p>Image 6 - River House, High Street.                      Again while the new cladding is an improvement for this building the building is out of scale to the City Centre Conservation</p>	<p>This image has been used as an example of an existing tall building that has more recently been repurposed for another use (Grade A offices in this instance). The city does not</p>

## Council response to key issues raised

Main Issue	Council Response
<p>area and generally to its surrounds. It therefore should not be used as an example of a successful repurposing.</p>	<p>contain a lot of examples of tall building repurposing, however in this case the new cladding did result in an improvement to the streetscape as acknowledged by the representative.</p>
<p><b>View north along Oxford Street</b></p>	
<p>We do not think the Obel Tower is a good example of "a visual stop by terminating views." The BT Tower on May Street is a better example. So too of course is the Dome of the City Hall along Donegall Place. So too is the Victoria Square Dome when looking at Victoria Square. A better picture of the Albert Clock could be obtained. However it is a good example of the point.</p>	<p>The Obel Tower being described as "a visual stop by terminating views" along Oxford Street is a statement of fact. We would disagree that the BT Tower On May Street is a better example.</p>
<p><b>Belfast waterfront skyline</b></p>	
<p>Clustering of tall buildings and an emerging skyline can be seen along the river Lagan which includes the residential tower of the Obel and more recent new office development at city Quays. We do not agree the Obel adds to the skyscape. It is out of context and dominates the riverfront and Custom House. It is an example of a tall building in the wrong location which unfortunately then attracts other tall out of context development. We do not agree to the riverfront as a cluster destination. The emphasis should be on horizontal aspects of a tall building rather than vertical to disguise the height.</p>	<p>The Obel forms a taller point within an emerging riverfront skyline which also includes more recently constructed buildings within the City Quays area. While the Obel once stood as a solitary taller element along the river, the building is beginning to sit more comfortably within an evident clustering of tall buildings along this new emerging riverfront skyline.</p>
<p><b>Use of greenery</b></p>	
<p>Use of greenery also contributes to improved frontage to the river. Generally we feel the following two points could be included in the narrative on tall buildings.</p> <p>1 Tall building should be assessed as to whether they interfere with views of the Belfast Hills or listed buildings or affect the setting of a listed building. Consideration should be given to listed views</p> <p>2 The grant of a tall building development consent favours a particular developer and may</p>	<p>Para 5.6.1 amended to read "How a building interacts at street level is critical and this is acutely so in the case of tall buildings, which due to their height and massing, tend to exceed those building dimensions typically associated with more traditional, domestic buildings of a human scale. At ground floor the layout of the tall building should contribute positively and help animate the streetscape through a mix of active uses which provide clear unobstructed views onto the street and surrounding public realm to enable a high degree of passive</p>

Main Issue	Council Response
<p>deter development in other locations given the number of gap sites in the city.</p> <p>We will forward some further examples of good tall building developments in the city.</p>	<p>surveillance. Layouts should include high quality public realm solutions that enhance both the setting of the tall building as well as that of neighbouring buildings including the use of greenery and landscape solutions. Proposed entrances should be well overlooked, and large stretches of blank and inactive frontages should be avoided."</p>
<p><b>Formalised key views</b></p>	
<p>SPG notes that In the absence of formalised key views and vistas across Belfast, any impact on views and vistas will be assessed on a case by case basis. We consider that identification of the most important key views in and out of the city (e.g., toward Divis) and of key landmarks would provide clarity and help protect these against potential inappropriate development. We consider that this guidance should be strengthened.</p>	<p>Work is currently underway in identifying a series of key views across the city centre. Once completed this document will be subject to a separate public consultation process.</p>
<p>Criteria (c) expands on what will be key views and vistas in the context of the policy including views from listed buildings, views from strategic vantage points such as public space, parks &amp; waterfront areas. In the absence of formalised key views (which are suggested as being forthcoming by BCC), applications will be assessed on a case-by-case basis but should include a detailed analysis of how the buildings sits within the wider context of the city. Other SPGs such as the Leeds Tall Buildings Design Guide<sup>10</sup> identify key views and therefore we would suggest that the draft SPG is premature as the key views should have been identified in advance of the publication of the SPG.</p>	<p>Work is currently underway in identifying a series of key views across the city centre. Once completed this document will be subject to a separate public consultation process.</p>
<p><b>Sunlight/daylight</b></p>	
<p>We welcome requirement for shadow impact assessment microclimate impact assessment set out a 5.7 and consider it particularly important that public places are protected from loss of sunlight. A more detailed methodology as to how acceptable levels of loss of sunlight/changes to microclimate will be assessed as well as how it will be determined if</p>	<p>Para 6.1.2 Bullet point 5 amended to read "Microclimatic Impact – evidence of wind testing, sunlight/daylight and shadow analysis and how these have influenced the proposed design approach. Applicants are advised to refer to the latest BRE publication 'Site layout planning for daylight and sunlight: a guide to good practice'."</p>

## Council response to key issues raised

Main Issue	Council Response
<p>outlook and daylight levels within the building are acceptable would be useful. We welcome the requirement for a heritage impact assessment as part of the tall building assessment.</p>	
<p>Maximising access to natural light in tall buildings: in aiming to maximise residential amenity for residents (both social and private tenure), there are several aspirational goals, which could be included in the SPG to demonstrate that consideration of the needs of each user group has been given sufficiently: - Maximising opportunities to provide dual aspect, improving light. - all homes should provide sunlight to enter at least one habitable room for part of the day. - Living areas and kitchen spaces should receive wherever possible direct sunlight. The SPG should demonstrate how daylight standards proposed within a scheme and individual units will achieve good amenity for residents where direct sunlight cannot be achieved. Developers should be reminded in the document that consideration of potential future development on adjacent or nearby sites to ensure appropriate levels of daylight/sunlight will be maintained, without prejudicing future development opportunities. if single aspect dwellings are unavoidable, the design will to demonstrate that all habitable rooms/kitchens are provided with adequate ventilation, privacy, and daylight and the orientation enhances amenity, including views. Specific recommendations for developers could be incorporated such as - Avoiding north facing single aspect dwellings in tall buildings. - avoiding single aspect dwellings exposed to noise levels above which significant adverse effects on health and quality of life could potentially occur. - avoiding single aspect dwellings that contain 3 or more bedrooms.</p>	<p>New para 5.7.4 inserted to read "Opportunities should be taken to maximise light penetration through the use of dual aspect layouts. All homes should benefit from adequate sunlight provision in at least one habitable room for part of the day. Living areas and kitchen spaces should also receive direct sunlight where possible. In circumstances where direct sunlight cannot be achieved, daylight standards proposed within a scheme and individual units should strive to achieve good amenity for residents. Due consideration will also need to be given to any potential future development on adjacent or neighbouring sites to ensure that appropriate levels of daylight/sunlight will be maintained without prejudicing future development opportunities. Where single aspect dwellings are unavoidable, the proposed layout should demonstrate that all habitable rooms/kitchens are provided with adequate ventilation, privacy and daylight and the orientation enhances user amenity (including views). North facing single aspect dwellings, single aspect dwellings that contain 3 or more bedrooms and single aspect dwellings that would be exposed to noise levels above which significant adverse effects on health and quality of life could potentially occur, should be avoided."</p>

Main Issue	Council Response
<p><b>Fire strategy</b></p> <p>All new tall buildings and reuse of tall buildings including introduction of new curtain walling systems must be considered in the context of fire safety. A fire strategy is required for all tall buildings and co-ordinated with NI fire and rescue, however, an acknowledgement of risks posed by tall buildings to vulnerable residents would be appropriate post Grenfell Enquiry. NIHE carried out a comprehensive Fire Risk Assessment in respect of all high-rise properties in its portfolio following Grenfell. All tall buildings are subject to BS8414 Test retrospectively and this could be referenced in the SPG to ensure developers are reminded of the Council's commitment to user safety. All major development proposals should be submitted with a Fire Statement, an independent fire strategy, produced by a third party, suitably qualified assessor. Statement could detail how development proposal will function in terms of: a) building construction, methods, products and materials used, including manufacturers' details; b) means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access and associated evacuation strategy approach; c) Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans; d) Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and ongoing maintenance and monitoring of these; e) How provision will be made to enable fire appliance access to the building; f) Ensuring that any potential future modifications to the building will take into account and not</p>	<p>This is a matter for building control and is beyond the remit of the Planning Act 2011 and a matter for building regulations.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>compromise the base build fire safety/protection measures.</p>	
<p><b>Junctions between buildings</b></p>	
<p>Building junctions and continuity; consideration of planning drawings has often failed to ensure that the junctions between buildings are sympathetically considered, resulting in disparities in floor levels and jarring architectural fenestration tie-ins. A diagrammatic representation and photographic study of a desirable cross section could assist developers and users and encourage more harmonious development.</p>	<p>New line added to para 4.1.8 to read "Junctions between buildings should be sympathetically considered so as to ensure a degree of continuity in the streetscape, avoid disparities between floor levels and the potential for jarring architectural fenestration tie-ins."</p>
<p><b>Contradictory policy wording</b></p>	
<p>In our previous submission to the Draft Plan Strategy, we identified that the wording of the policy (DES3 Tall Buildings) was somewhat contradictory in that it requires proposals for tall buildings to cluster with other tall buildings, therefore directing development to specific locations with existing tall buildings, yet the final text of the policy states "Existing tall buildings within Belfast will not set a policy precedent for similar development on adjacent sites." We had also raised concerns that the policy was effectively silent on the ability to achieve tall buildings on standalone sites, i.e., away from existing clusters.</p>	<p>For clarity, Policy DES3 states that "Existing tall buildings within Belfast will not set a policy precedent for similar development on adjacent sites. In all cases applications for tall buildings will be expected to adhere to supplementary planning guidance". While surrounding context is a material consideration, merely identifying taller buildings across the city to justify building height within an entirely different context, will not be considered an acceptable design rationale. Cases may also exist whereby existing tall buildings are considered an anomaly within their context and would not in themselves provide justification for additional tall buildings. In these instances the council will not be held by poor historic decisions.</p>
<p><b>Design Review Panel</b></p>	
<p>The establishment of an independent Design Review Panel could be beneficial to the overall process; however, given the lack of detail, we would have concerns as to how this could be delivered in practice, the extent of their influence and remit, timescales around engagement, and ultimately who funds this (does it just add another cost to an already finely balanced project in terms of overall viability?).</p>	<p>The Design Review Panel would comprise members from across a range of fields including urban design, architecture, landscape architecture, conservation and engineering. As a process independent from Planning, this Panel could be utilised as and when required to conduct design reviews to help ensure that tall buildings are of the highest design quality and make a positive response and contribution to surrounding context and has proved successful within other Planning Departments across Ireland and the UK. While the establishment of</p>

Main Issue	Council Response
	<p>a Design Review Panel is continually under review, the council reserves the right to establish a panel in the future should it consider that doing so would contribute positively to the planning process and assist in delivering our customer service commitments. Details such as extent of influence, remit, timescales and funding are all issues that are currently under consideration.</p>
<p>The SPG identifies that there is potential for a Design Review Panel to be set up, independent from planning to conduct design reviews around tall buildings. There is no further information on this aspect of the process, when it might be formed, or who will be responsible for instigating that process. It would be prudent to establish the Design Review Panel in advance of the publication of the final SPG on Tall Buildings.</p>	<p>The Design Review Panel would comprise members from across a range of fields including urban design, architecture, landscape architecture, conservation and engineering. As a process independent from Planning, this Panel could be utilised as and when required to conduct design reviews to help ensure that tall buildings are of the highest design quality and make a positive response and contribution to surrounding context and has proved successful within other Planning Departments across Ireland and the UK. While the establishment of a Design Review Panel is continually under review, the council reserves the right to establish a panel in the future should it consider that doing so would contribute positively to the planning process and assist in delivering our customer service commitments. Details such as extent of influence, remit, timescales and funding are all issues that are currently under consideration.</p>
<p><b>Tall Building Design Statement</b></p>	
<p>The SPG requires the submission of a Tall Building Design Statement (TBDS) to support a planning application. Typically, an application for a tall building will likely meet the threshold of a Major Development, so it is unclear as to whether this is an additional report over and above the legislatively required Design and Access Statement and the Design Statement/Design Code that appears to be required under other SPG (Masterplanning).</p>	<p>The requirement to submit a TBDS would be in addition to the legislatively required Design and Access Statement (DAS) required for major development. A TBDS is specific to buildings that are over 35.0m (AOD) or those which are significantly higher than their surroundings (as defined by Policy DES3). As not all major development would constitute a Tall Building as defined by Policy DES3, a TBDS would set out the design vision for the tall building proposal outlining how the policy criteria contained within DES3 have been fully addressed,</p>

## Council response to key issues raised

Main Issue	Council Response
<p>The SPG requires the submission of a Tall Building Design Statement (TBDS) to support a planning application. This would provide a range of information, but a contextual analysis is identified as a key component. This can include an analysis of existing and planned building heights in the area. The SPG references how the proposed height, scale and massing was reached and how it will positively impact the character and appearance of the area in accordance with good placemaking principles. This creates a higher test than sits within the policy heading.</p>	<p>alongside justification for the appropriateness of a tall building on the proposed site.</p> <p>A TBDS is the vehicle for demonstrating and setting out the design vision for buildings that are over 35.0m (AOD) or those which are significantly higher than their surroundings as defined by Policy DES3 and outlined within the Justification/Amplification text.</p>
<p><b>Urban renewal/regeneration benefits</b></p>	
<p>SPG should provide greater emphasis on the ability to achieve standalone tall buildings in the context of wider urban renewal and regeneration benefits. The focus on the ability to achieve standalone tall buildings within the city is welcome in that it also ties into the ability to act as a catalyst in regenerating often neglected sections of the city. This is acknowledged by the Historic England Tall Buildings Advice Note 4 which helpfully states that "In the right locations Tall Buildings can support major change or regeneration while positively influencing Place Shaping and conserving the historic environment".</p>	<p>The SPG does not advocate that tall buildings would be acceptable anywhere in the city based solely on projected renewal and regeneration benefits. The council acknowledges that cases may exist whereby not all of the criteria included within Policy DES3 (a-h) can be fully realised. In such cases the overall positive impacts of the development, which may include wider urban renewal and regeneration benefits, will be weighed against any potential negative impacts and a balanced assessment made.</p>
<p>Paragraph states that tall buildings can also act as catalysts within areas earmarked for regeneration, helping to foster a degree of focus, momentum, and certainty to these often-neglected sections of the city. The SPG should acknowledge the importance of tall buildings in areas which regeneration is ongoing and not just in neglected sections of the city. Whilst it is important to focus regeneration on neglected sections of the city ensuring the ongoing regeneration of other sections of city such as Titanic Quarter, City Quays, Belfast Waterside, Weavers Cross etc is also important. The</p>	<p>The SPG does not advocate that tall buildings would be acceptable anywhere in the city based solely on projected renewal and regeneration benefits. The council acknowledges that cases may exist whereby not all of the criteria included within Policy DES3 (a-h) can be fully realised. In such cases the overall positive impacts of the development, which may include wider urban renewal and regeneration benefits, will be weighed against any potential negative impacts and a balanced assessment made.</p>



Main Issue	Council Response
<p>Historic England Tall Buildings Advice Notice 4 helpfully states that 'in the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment'.</p>	
<p><b>Clarity on supporting documentation</b></p>	
<p>Council should provide clarity on what documents are required to support certain applications as there appears to be duplication of the same documents (with different names) required across the range of SPGs.</p>	<p>Each SPG should be read in the context of the subject matter to which they address in order to ascertain what documents are required to be submitted in support of a planning application. The Tall Buildings SPG is clear in the type of documents it outlines. In addition to the legislatively required Design and Access Statement (DAS) that should accompany all applications for major developments, all applications that trigger the definition included in Policy DES3 are also required to include a Tall Building Design Statement that is specific to buildings that exceed 35.0m AOD or those which are significantly higher than their surroundings.</p>
<p><b>Traditional tripartite ordering</b></p>	
<p>The SPG provides what are considered to be fundamental principles of tall building composition with it having a base, middle and top and provides guidance on how these elements should be designed, taking account of buildings within the surrounding context and their respective shoulder heights, eaves heights and ridge heights of prominent building details. Whilst it is acknowledged that there may be occasions when variations of this principle could be considered appropriate, we consider the requirement as a 'fundamental principle' is onerous. The Historic England Tall Buildings Advice Notice 49 states that it is helpful to consider the relationship between the top, middle, and bottom sections of a tall building with their surroundings and the potential impact on streetscape, town/cityscape, and skyline. The advice note</p>	<p>The SPG does not stipulate that this is a "fundamental principle" and recognises that the design of a tall building will vary in response to surrounding context and intended use. The SPG merely highlights that tall buildings can often follow the traditional tripartite ordering of three integrated components; namely the base, middle and top, albeit expressed in a contemporary manner. The SPG further adds that while these components can have a particular role to play in the overall composition of the building, it also acknowledges that there may be occasions when variations of this principle could be considered appropriate. This wording was formulated through multiple Working Group workshops and is not considered onerous.</p>

## Council response to key issues raised

Main Issue	Council Response
<p>does not state that tall buildings should have a base, middle and top.</p>	
<p><b>Viability</b></p>	
<p>The SPG provides guidance on the re-use and re-design of existing tall buildings as a means of breathing new life into these structures. This approach is supported, in principle, by the council. They will also encourage a reuse and renew approach rather than demolition being the only option considered. It is also suggested that where additional floors are proposed as a requirement to make a scheme viable will require careful consideration. Whilst not explicit in the guidance viability should be taken into consideration whilst considering re-use vs. demolition.</p>	<p>The adaptive reuse and reappropriation of our building stock is good practice and one of the most sustainable forms of development that can help extend the lives of buildings while regenerating brownfield sites. Para 4.2.4 acknowledges that cases may exist whereby demolition may be the only viable option, however the council in the first instance supports the adaptive and sustainable reuse of tall buildings across the city. Given that there is a separate standalone Viability SPG, it is not considered necessary to discuss detailed issues pertaining to viability in this SPG.</p>
<p><b>High quality public realm</b></p>	
<p>Criteria (f) requires the creation of high-quality public realm to enhance the setting of the tall building and those around it. This creates difficulty in understanding the full extent of a red line boundary and has the potential to require land beyond control.</p>	<p>The extent of any potential public realm works should form part of early PAD discussions and would be considered on a case by case basis.</p>

## Masterplanning approach for Major Development

### Summary of Responses

Eight respondents made representations in respect of the Masterplanning Approach for Major Development SPG. Of the comments submitted:

- **Support** received for the guidance and its potential to provide more connected and energy efficient development.
- Reference could be made to the **Transport/Road network and TA/Strategic Transport Master Plans**.
- Potential **impact on sightlines** should be considered.
- Should be a **masterplan diagram** added to guidance to show what a masterplan should ideally comprise.
- Several responses suggested that further clarification could be provided on the **definition of major development**.
- SPG should be **read in conjunction with other SPGs** such as placemaking and tall buildings and residential design.
- Suggested that reference be made to **Creating Places** analysis diagram.
- Examples of **design codes** could be provided to illustrate what is required in the context of masterplanning.
- Applications should provide **justification why demolition** is deemed appropriate.
- Suggested that **TPOs and trees in conservation areas** will be required to be retained unless there a tree survey justifies their loss.
- There should be no undue **influence by third parties** asserted on the development process.
- Reference made to Design Concept Statements as required within **PPS 7** (Policy QD2).
- Several responses suggested that the SPG could provide clearer direction on **Design Statement/code thresholds**.

### Responses Received

Reference	Respondent
SPG-R-03	National Trust
SPG-R-13	Bywater Properties, Southbank Square MRP & Wirefox
SPG-R-21	NI Housing Executive (NIHE)

Reference	Respondent
SPG-R-24	Belfast Harbour
SPG-R-25	Titanic Quarter Ltd
SPG-R-26	Lacuna Developments
SPG-R-27	Dfl - Roads (Dfl – DP/TPMU/TICC)
SPG-R-28	Swinford Sirocco 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>	
<p>We (National Trust) are supportive of the masterplanning approach set out in this guidance and the potential of this approach to provide development that is more connected for people and nature. We particularly welcome the emphasis on energy efficiency in new major development. We believe that the existing biodiversity value of the site should also be considered as part of the masterplanning process and opportunities sought to enhance this and connect areas of biodiversity value within the site and the wider context.</p>	<p>The Council welcomes support for the SPG.</p>
<b>Transport/Road network and Transport plans</b>	
<p>Refer to the Transport / Road network and TA / Strategic Transport Master Plans (STMP).</p>	<p>Paragraph 3.1.7 amended to read "With regards to how the proposal connects and integrates with its wider context, cognisance should be given to any existing published strategies that may have a bearing on the site. These may include masterplans and frameworks produced by the council and/or statutory agencies such as the Belfast City Centre Regeneration and Investment Strategy, Inner North West Masterplan, East Bank Development Strategy, Belfast Entries Project and the Green &amp; Blue Infrastructure Plan to ensure compatibility and alignment with any agreed visions, aims and objectives. Consideration should also be given to the transport/road network, any relevant Transport Assessment and DfI's Strategic Transport Master Plans."</p>
<p>Refer to Transport / Road network and DfI's Transport Plan (study) for the Metropolitan area.</p>	<p>Paragraph 3.1.7 amended to read "With regards to how the proposal connects and integrates with its wider context, cognisance should be given to any existing published strategies that may have a bearing on the site. These may include masterplans and frameworks produced by the council and/or statutory agencies such as the Belfast City Centre Regeneration and Investment Strategy, Inner North West Masterplan, East Bank Development Strategy, Belfast Entries Project and the Green &amp; Blue</p>

## Council response to key issues raised

Main Issue	Council Response
	Infrastructure Plan to ensure compatibility and alignment with any agreed visions, aims and objectives. Consideration should also be given to the transport/road network, any relevant Transport Assessment and DfI's Strategic Transport Master Plans."
<b>Impact on sightlines</b>	
Potential impact on sightlines must be considered, along with maintenance (who will maintain?).	These are detailed considerations that would be considered as part of the masterplan development process.
<b>Masterplan diagram</b>	
There should be a diagram added to this guidance to show what a masterplan should ideally comprise with annotations to highlight key features and linkages to adjacent lands. An example masterplan from a previous application would suffice or even drawing on a case study from another jurisdiction if required. although there are images contained within the guidance, which show parts of the masterplan there, is no final masterplan provided within. Page 28 for example of creating places shows on a plan form how a masterplan should look. this could be altered to provide a more modern example of a model masterplan to provide the reader with an example of how it should be presented. This could be added to the appendix and provide steps on how to achieve the masterplan.	This SPG does not relate to the production of masterplans but provides advice, by way of text and illustrations, on how to apply a masterplanning approach in the cases of major developments.
<b>Definition of major development</b>	
This could clarify the definition of major development in the guidance. Legislation is not always legible to the reader.	As stated in para 1.14 - Masterplans will be required for applications that are defined as 'Major development' applications as outlined within Regulation 2 of the Planning (Development Management) Regulations (Northern Ireland) 2015). As the definition and/or regulations could be subject to change in future, listing every aspect could render the document out of date.
States that Masterplans will be required for applications that are defined as 'Major development' applications as outlined within Regulation 2 of the Planning (Development	Due to the myriad of issues that would be associated with large scale proposals, including change of use and temporary uses, this would apply to all major applications. The detail of the

## Council response to key issues raised

Main Issue	Council Response
<p>Management) Regulations (Northern Ireland 2015). This might not be appropriate for all major developments, such as a change of use application that would involve floorspace above the requisite threshold in the Development Management Regs or a temporary use.</p>	<p>masterplan should however be appropriate to scale and nature of the proposal.</p>
<p><b>Referencing other SPG</b></p>	
<p>The SPG should be read in conjunction with other SPGs such as placemaking and tall buildings and residential design.</p>	<p>New paragraph inserted (1.2.3) to read "This SPG should also be read in conjunction with the Plan Strategy and full suite of Council SPGs, in particular Placemaking and Urban Design SPG, Tall Buildings SPG and Residential Design SPG."</p>
<p><b>Building design</b></p>	
<p>The second sentence (3.1.4) could read "...are equally important as <del>if not more important than</del> the buildings themselves..." There is a typo in the last sentence, should read "can overly restrict architects"</p>	<p>From an urban design viewpoint the spaces and areas around and between buildings are often viewed as more important than the design of the buildings themselves.</p>
<p><b>Reference Creating Places diagram</b></p>	
<p>This (3.1.8) could also refer to page 13 of Creating Places ... schematic land use analysis is a useful example.</p>	<p>Inner North West Masterplan example already included which adequately illustrates analysis process.</p>
<p><b>Design code</b></p>	
<p>Examples of design codes could be provided to illustrate what is required in the context of masterplanning.</p>	<p>Extract from approved Sirocco design code inserted after paragraph 3.1.14.</p>
<p><b>Justification of demolition</b></p>	
<p>Applications should justify why a demolition is deemed appropriate.</p>	<p>New paragraph 3.3.4 inserted to read "The council encourages the responsible reuse, reappropriation and upgrade of existing buildings with any new interventions being sympathetic to the buildings age, character and construction. Cases may exist where it would be deemed appropriate to demolish the existing building, however these should be treated as the exception and not the norm and supplemented by appropriate justification."</p>
<p><b>TPOs and trees in conservation areas</b></p>	
<p>It could be added that TPOs and trees in conservation areas will be required to be retained unless there is a tree survey and justification for their loss.</p>	<p>New paragraph 3.8.2 inserted to read "Trees in Conservation Areas will be required to be retained unless the application includes an appropriate tree survey and justification for</p>

Main Issue	Council Response
	their loss or replacement. This issue is addressed in further detail within a separate Trees SPG."
<b>Influence by third parties</b>	
<p>SPG sets out supplementary text regarding the importance of considering a development within its wider context in order to ensure the avoidance of piecemeal development and potentially prejudicing the development of adjacent site. It advocates, "encouraging, where appropriate" consultation with adjacent landowners early on to ascertain the benefits of a joined-up approach. It is considered that this recognises that it is not always possible to bring all parties to the table, and as such, coupled with the recognition in paragraph 3.1.3 that a masterplan should be "a dynamic document that incorporates a degree of flexibility and does not set rigid overly prescriptive design criteria for the future development and design of the proposal", that there should be no undue influence by third parties asserted on the development process.</p>	<p>New paragraph 3.1.3 inserted to read "Applicants are therefore encouraged, where appropriate, to consult adjacent landowners early on to ascertain the benefits that a joined up approach may bring to the masterplanning process and the wider aspirations of the area. While this can sometimes prove challenging, efforts should be made to demonstrate that meaningful engagement has taken place with adjacent landowners."</p>
<b>Reference to PPS7</b>	
<p>Design Statements can be an effective tool in prescribing broad design parameters for "small and medium sized sites". Design Codes are useful for "larger more complex sites and ones with longer term implementation strategies" (Para. 3.1.11). This essentially describes existing policy context of PPS 7 – Policy QD2; whereby a Design Concept Statement is required for all residential applications, but a concept masterplan is required for applications involving 300 or more dwellings or sites over 15 ha.</p>	<p>The Council agrees with statement. However in the context of Belfast, PPS7 will no longer apply once the Plan Strategy is adopted.</p>
<b>Design statement/code thresholds</b>	
<p>The SPG text does not provide any clear direction on any actual thresholds as to when a Design Statement is sufficient and when the requirement would change to a Design Code. Furthermore, as this is required for all major applications, the SPG is also silent on whether</p>	<p>Paragraph 3.1.12 amended to read "Once masterplanning principles are formulated, further detail can be set out in the form of Design Code depending on the size and complexities associated with the site. The level of detail provided can be broad or provided on</p>

## Council response to key issues raised

Main Issue	Council Response
<p>the Design Statement is a separate document to the statutorily required, Design and Access Statement. SPG should specify exactly when Design Codes are required.</p>	<p>a plot by plot basis, however it should underpin the key masterplanning/urban design principles that are being sought as well as reflecting the overall vision for the area. Applicants are advised to seek clarity with the council at an early stage, preferably during PAD, as to whether their site would require a 'Design Statement' or in the case of larger more complex sites a 'Design Code'."</p>
<p>The SPG refers to the provision of Design Codes however does not state when they will be required other than for larger more complex sites.</p>	<p>Paragraph 3.1.12 amended to read "Once masterplanning principles are formulated, further detail can be set out in the form of Design Code depending on the size and complexities associated with the site. The level of detail provided can be broad or provided on a plot by plot basis, however it should underpin the key masterplanning/urban design principles that are being sought as well as reflecting the overall vision for the area. Applicants are advised to seek clarity with the council at an early stage, preferably during PAD, as to whether their site would require a 'Design Statement' or in the case of larger more complex sites a 'Design Code'."</p>



## Advertising and signage

### Summary of Responses

Five respondents made representations in respect of the Advertising and Signage SPG. Of the comments submitted:

- **Support** received with respect to the Section 6 regulations.
- **Monitoring impact on setting of heritage assets** would be appropriate to evidence how the policy meets plan objectives.
- **Ability of signage to enhance** the character and appearance of an area was highlighted.
- **Consistency of language** highlighted in relation to heritage assets.
- **Effects of illuminated signage** emphasised particularly with respect to listed buildings, their essential character, special interest and setting.
- Suggested general good practice in relation to **signage on or impacting setting of heritage assets**.
- Several responses suggested ways to strengthen **application requirements** in relation to applications associated with heritage assets and petrol filling stations.
- Consider additional terminology with respect to **road safety** aspects of advertisements.
- Due regard should be given to any road safety implications around **avoidance of clutter**.
- Consideration should be given to the **cumulative effect of digital advertisements** when read with other advertisements and signs.
- **Distance from carriageway** a key consideration in placement of signs.
- Need to have clearer guidance on **vinyl on glazing at ground floor**.
- Need to ensure that advertisements and signage are not **pavement hazards**.
- Issue of **hoarding** should be addressed.
- Consider adding hyperlink to the **Lighting Engineers Technical Report**.

### Responses Received

Reference	Respondent
SPG-R-01	Individual
SPG-R-17	IMTAC
SPG-R-20	DfC - Historic Environment Division

Reference	Respondent
SPG-R-21	NI Housing Executive (NIHE)
SPG-R-27	DfI - Roads (DfI – DP/TPMU/TICC)

## 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>	
<p>Welcome this direction (Section 6 regulation) – would significantly enhance the character and appearance of the identified areas.</p>	<p>The Council welcomes support for this aspect of the SPG.</p>
<b>Monitoring impact on setting of heritage assets</b>	
<p>HED through the Plan Strategy consultation process outlined concerns with a single policy approach for advertisement and signage proposals affecting Listed Buildings, Conservation Areas and Areas of Townscape Characters, with the potential effect of lowering the policy test for listed buildings, from the existing policy framework. HED acknowledges the findings of the PAC report, but consider monitoring the application of this policy in respect of advertisements on or within the setting of listed buildings would be appropriate, to evidence how the policy meets with plan objectives.</p>	<p>The council's planning enforcement team addresses alleged breaches of planning control relating to the unauthorised display of advertisements.</p>
<b>Ability of signage to enhance</b>	
<p>..'Will not detract from the place'– sensitively designed and positioned signage has the potential to enhance the character and appearance of an area. This would be particularly important where the general characteristics of an area are poor.</p>	<p>Para 4.2.3 amended to read "Sensitively designed and positioned signage has the potential to enhance the character and appearance of an area, however care must be taken to ensure that an advertisement will not detract from the place where it is to be displayed or its surroundings and that it will not prejudice public safety. In particular, it is important to prevent clutter, adequately control signs involving illumination and to protect features such as listed buildings, conservation areas and areas of townscape character (ATCs) from the potential adverse effects of advertising.</p>
<b>Consistency of language</b>	
<p>Consistency of language – suggest 'heritage assets', rather than features</p>	<p>Para 4.2.7 amended to read "In this regard, there is a particular need to protect the important townscape features and heritage assets, such as listed buildings and their settings, conservation areas and areas of townscape character. Therefore, every application for consent to display an</p>

Main Issue	Council Response
	advertisement within the Belfast City Council area will be treated on merit, taking into account existing legislation, Local Development Plan and the guidance described within this SPG.
<b>Effects of illuminated signage</b>	
<p>Illumination of signage can have a particularly adverse effect on listed buildings, and detract from their essential character, special interest and their setting. Suggested insertion: 'Particularly relevant to historic areas and listed buildings and their settings'.</p>	<p>Para 4.3.2 amended to read "Well designed and sensitively sited advertisements and signs, where thought has been given to their size, colours, siting and levels of illumination, can contribute positively to the visual qualities of an area. However, advertisements and signs can be added to a building or placed in a location as an afterthought. As a result, a good building, neighbourhood or sensitive location can be easily spoiled by poorly designed advertising and signage, which appears overly dominant, unduly prominent or simply out of place. This is particularly relevant to historic areas of the city, including listed buildings and their settings, where overly contemporary/modern styles of design may be considered unsympathetic to surrounding context."</p>
<p>Last bullet point references illumination in respect of residential amenity only – should also include impact on designated heritage assets and their settings.</p>	<p>Para 4.3.4 bullet point 5 amended to read "the impact of the advertisement/sign, including its size, scale and levels of illumination, on the amenities of people living nearby and on designated heritage assets and their settings and the potential for light pollution."</p>
<b>Signage on or impacting setting of heritage assets</b>	
<p>Heading 'Respecting the setting of heritage assets' does not reflect when signage is proposed on a listed building. Suggested change: 'Respecting impact on heritage assets and their settings'. Evidence base PPS6, BH9 provides more specific clarification to help inform decision making for signage applications in regard to LB's. Reference to the following would be welcome: Historic signage – e.g. hand painted signage, gable painted signage which contributes to the character and appearance of the building and the area should be protected and retained. Style -signage</p>	<p>Chapter heading amended to read '4.5 Respecting impact on the setting of heritage assets and their setting'. Para 4.5.1 amended to read "Advertising proposals affecting listed buildings, Conservation Areas, Areas of Townscape Character (ATC) or other areas of high amenity value require special consideration and sensitivity. The following would represent general good practice in relation to signage either on or impacting the setting of heritage assets; (a) Historic signage – hand painted signage, gable painted signage which contributes to the character and</p>

## Council response to key issues raised

Main Issue	Council Response
<p>should complement the age and architectural style of the building. Materials – handwritten timber board or brass plate providing the most acceptable form of advertisement. Projecting signs – should be limited as they can contribute to visual clutter and adversely affect LBs. Illumination – can have significant adverse impact on character and appearance of LBs – presumption against illumination and lighting projecting forward. Halo lighting of individual letters may for some buildings be considered acceptable and should have warm white lighting.</p>	<p>appearance of the building and the area should be protected and retained. (b) Style -signage should complement the age and architectural style of the building. (c) Materials – handwritten timber board or brass plate providing the most acceptable form of advertisement. (d) Projecting signs – should be limited as they can contribute to visual clutter and adversely affect LBs. (e) Illumination – can have significant adverse impact on character and appearance of LBs – presumption against illumination and lighting projecting forward. Halo lighting of individual letters may for some buildings be considered acceptable and should have warm white lighting."</p>
<p>Should be some mention of the sensitivity of heritage assets and their setting in the text box, as acknowledged in relation to Digital Signage (Bullet point 2, 5.9.3.) and Small Format Outdoor Advertisement (Bullet point 3, 5.10.2).</p>	<p>Additional bullet point inserted to para 5.7.2 to read "Avoid sensitive areas where they could result in a competing focus including near listed buildings, within conservations areas/ATCs and predominantly residential areas."</p>
<p><b>Application requirements</b></p>	
<p>Submitting an application for advertisement consent Bullet point 1, 'Drawings' should include a detail section if proposed on a listed building to illustrate profile and fixing method in relation to existing features. Bullet point 4, confirm default colour setting if changeable (warm white preferable for listed buildings). HED also refer to our Consultation Guide, p.17</p>	<p>Bullet point 1 amended to read "Drawings - scale drawing(s) outlining the dimensions of the advertisement/sign and the building on which it is to be located. Should clearly show its position on the land or building in question i.e. its height and width, its height above ground level and the degree of projection from the building. If proposed on a listed building, drawings should include a detail section to illustrate profile and fixing method in relation to existing features."</p> <p>Amend bullet point 4 "Illumination – confirmation if the sign is to be illuminated as well as the type and colour of illumination and if static or intermittent. Confirmation should also be provided of default colour setting if changeable with warm white preferable for listed buildings. Reference should be made to the Historic Environment Division's guide to</p>

## Council response to key issues raised

Main Issue	Council Response
	consulting on development management applications for further information."
Applications for Filling Station/Forecourt Signage, should be submitted along with the Full application, when located within the setting of a listed building. Lighting of filling stations can have a significant adverse impact on setting and how a listed building is seen, appreciated and read in its context.	The application process for advertising and signage is separate from the planning application process. Applicants cannot be compelled to submit these applications at same time.
Often Petrol Filling Station (PFS) signs make up part of the full application for the PFS and therefore it should be apparent here that details of design and illumination should be submitted with the full application. It could also highlight that separate consent is required.	Separate control of advertising consent applications are required for PFS signs where these issues are considered.
Full planning applications should include all details of signage and advertisements in order to assess in a holistic way at time of full planning and that separate consent is required.	This is a separate application process and cannot be mandated as part of a planning application.
<b>Road safety</b>	
Consider (adding): In terms of Road Safety. Well designed (safe) and sensitively sited advertisement....	Para 4.3.2 amended to read "Well designed, safe and sensitively sited advertisements and signs, where thought has been given to their size, colours, siting and levels of illumination, can contribute positively to the visual qualities of an area. However, advertisements and signs can be added to a building or placed in a location as an afterthought. As a result, a good building, neighbourhood or sensitive location can be easily spoiled by poorly designed advertising and signage, which appears overly dominant, unduly prominent or simply out of place. This is particularly relevant to historic areas of the city, where overly contemporary/modern styles of design may be considered unsympathetic to surrounding context."
Road safety - consider adding "...those which by virtue of their size or siting (orientation /angle to road)"	Para 4.6.2 (b) amended to read "those which, by virtue of their size or siting (orientation/angle to road), would obstruct or confuse a road user's view or reduce the clarity or effectiveness of a traffic sign or traffic signal, or those which

## Council response to key issues raised

Main Issue	Council Response
	would be likely to distract road users because of their unusual design.
<b>Avoidance of clutter</b>	
Avoidance of clutter - take into account road safety (inc. pedestrian traffic)	Additional bullet point inserted to para 4.4.2 to read "Due regard should be given to any road safety implications that the cumulative effect of advertisements and signs may have, particularly in relation to possible restrictions to those who walk, wheel and cycle."
<b>Cumulative effect of digital advertisements</b>	
Could there be something re: demonstrating need for smart hubs / phone kiosks in addition to the guidance around clutter. Particularly as many of the hubs appear to be primarily advertising screens and to a lesser extent, phone boxes.	Additional bullet point inserted to para 5.9.3 to read "Consideration should be given to the cumulative effect of digital advertisements when read with other advertisements and signs which would result in clutter to the streetscape."
Modern Digital Displays, Kiosks etc Where can applicants find more detail on these?	It is considered that sufficient detail is contained within SPG in relation to digital displays/kiosks.
<b>Distance from carriageway</b>	
Projecting signs, blinds and awnings - distance from carriageway	This is already addressed in para 4.6.2 (c).
<b>Vinyl on glazing at ground floor</b>	
Need to have clearer (and perhaps stricter) guidance on vinyl on glazing at ground floor, e.g. on shop fronts ... we need to promote active frontage and vinyl in the windows often has a negative impact on the streetscape – by day and night (e.g. loss of ambient light spilling out from shopfront if it is vinyl-ed out).	New para (5.5.4) inserted to read "Coverings that obscure glazed areas at ground floor level, undermining good placemaking and urban design principles that promote active frontages, should be avoided."
<b>Pavement hazards</b>	
As a guide dog owner and being blind I find that you need to take on board the response for advertising and signage to be out of the way for those of us who are unable to see it when it is propped up in the middle of the street. You need to ensure that it is not a pavement hazard for all of us. The same goes for pavement furniture. It needs to be within 1.5 metres away from the building line and barricaded off so that it does not spill out onto the rest of the pavement so as to make it impossible for people to navigate safely the	This is an issue that falls under Dfl's responsibility for ensuring footways kept free of clutter. Signage that requires advertising and signage consent will be considered in relation to any impact on footways in line with good practice.

Main Issue	Council Response
<p>pavement. all signage needs to be either tucked into the building line or it needs to be out on the edge of the kerb. Safely out of the way of the navigating public. It shouldn't be sticking out at head height so that those of us who can't see it walk into it. Basically pavements need to be kept clear and clutter free from all advertising and signage.</p>	
<p>Unauthorised footway advertising boards are a ubiquitous blight on many of the retail streets in Belfast. They cause obstructions and hazards for many people walking and wheeling in the city. The Advertising and Signage SPG should make clear that street A Boards are unauthorised, outside of the current planning system and should not be used on our streets.</p>	<p>This is an issue that falls under DfI's responsibility for ensuring footways kept free of clutter. Signage that requires advertising and signage consent will be considered in relation to any impact on footways in line with good practice.</p>
<p><b>Hoarding</b></p>	
<p>Should hoarding be added (perhaps "poster panel displays" relates to hoarding?) and displays on bus shelters, which can be illuminated.</p>	<p>Hoarding is covered by Section 5.2 Poster panel/freestanding displays whilst bus shelter displays are covered under Section 5.10 Small format outdoor advertisements.</p>
<p><b>Lighting Engineers Technical Report</b></p>	
<p>Consider adding hyperlink to the Lighting Engineers Technical Report.</p>	<p>Written reference is considered sufficient.</p>

## Council response to key issues raised

### Retail and main town centre uses

#### Summary of Responses

Two respondents made representations in respect of the **Retail and main town centre uses** SPG. Of the comments submitted:

- It was suggested that the section relating to extensions to existing retail development contained **contradictory statements**;
- One respondent felt that **drivetime catchments** for retail proposal should not be stipulated by the council;
- Clarity was requested on **alternative impact assessments** and whether the requirement for these is adding a new policy test; and
- Minor **wording edits** including explanation of acronyms, detailing other main town centre uses and providing clarity.

#### Responses Received

Reference	Respondent
SPG-R-11	MBA Planning

Reference	Respondent
SPG-R-21	NIHE

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

Main Issue	Council Response
<b>Contradictory sentence</b>	
The first two sentences of paragraph 3.1.10 are contradictory. It was suggested that the first sentence should be deleted.	The council agrees that there appears to be a contradiction in the first two sentences of paragraph 3.1.10 and consequently recommends removing the second sentence that states that they will be addressed on a case by case basis.
<b>Drivetime catchments</b>	
SPG should not stipulate drive time catchment or determine a catchment based solely on a set drive time.	BCC acknowledges the comments; however, the council would disagree that drive time catchments should not be stipulated. Applications for retail development cannot be considered on the basis of a name operator.
<b>Alternative impact assessments</b>	
Lack of clarity around 'alternative impact assessment'. The SPG imposing a new test not included in policy.	The council agrees that an 'alternative impact assessment' has not been explained within the SPG. Additional paragraph has been added detailing alternative impact assessment beyond retail impact assessments for other main town centre uses.
<b>Glossary definition</b>	
Drive through restaurant is not a main town centre use and should be removed from the glossary.	The council agrees that a drive through restaurant is not a main town centre use



## Council response to key issues raised

Main Issue	Council Response
	and confirms that this will be removed from the glossary.
<b>Clarity/Explanation and additional text</b>	
Explanation required on acronyms PRC and PRF in Figure 2 within para 3.1.7.	It is agreed that the acronyms need explained prior to them appearing in figure 2. Paragraph 3.1.7 has been amended to include the full wording of each acronym i.e. the Primary Retail Core (PRC) and Frontage (PRF).
The list of uses which constitute "other main town centre development" specified in policy RET2 could be included for clarity in the SPG.	The council agrees that a footnote be added in line with RET2 as suggested by NIHE. Paragraph 3.1.11 footnote 2 added which reads: Includes cultural and community facilities, retail, leisure, entertainment and businesses
At figure 5 a bullet point could be included to refer to the potential to provide carbon neutral development i.e. both in the building fabric and by virtue of where it is located	The council does not consider there is merit in adding the additional text relating to carbon neutral development. This is adequately addressed in other policies in the dPS.
Additional text suggested to paragraph 3.2.6 to allow for clarity around affected centres in neighbouring authorities requiring assessment.	It is considered that there is merit in adding this additional text to provide clarity that affected centres within neighbouring authorities will require assessment.
Suggested additional text paragraph 3.2.8 stating that submission of an inadequate impact test would result in refusal of planning permission.	The council does not agree with the suggested wording, as the policy does not mention inadequate submissions.
At figure 6, para 3.4.3, 3.5.1 & 3.5.3 should specify that threshold measurements are related to external space.	The Council considers there is merit in specifying that the measures are related to external space i.e. Gross Square Metres.
Reference could be made at paragraph 3.3.5 to online shopping and its impact on retail centres and uses with respect to the "no development" scenario.	The council considers that there is merit in adding additional sentence relating to changes in shopping habits including online shopping at paragraph 3.3.5.
A design and access statement should be used to illustrate conformity with criterion 'E' of RET3.	The council disagrees with the suggested amendment. This information should be included in the retail statement.
A question raised regarding vacant retail units and whether they count towards the percentage of vacancy on a street.	The council considers that vacant retail units will count towards the percentage. Paragraph 3.7.1 therefore updated to add the following sentence: The 40% threshold includes vacant units that were last in retail use and do not have an extant permission for non- retail use.

## Council response to key issues raised

### Loss of zoned employment land

#### Summary of Responses

Two respondents made representations in respect of the Loss of Zoned Employment Land SPG. Of the comments submitted:

- It was suggested that the first bullet point of **RDS** should be referenced which emphasizes the need to retain zoned employment land;
- Reference to **exceptional circumstances** that would allow for proposals to come forward in the absence of full period of market testing; and
- The need to delete Paragraphs 3.4.1 and 3.4.2 in respect to **mixed used development** as it introducing additional policy tests beyond Policy EC 4.

#### Responses Received

Reference	Respondent
SPG-R-21	NIHE
SPG-R-23	Turley

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

Main Issue	Council Response
<b>Exceptional Circumstances</b>	
The SPG should refer to exceptional circumstances that would allow a proposal to come forward in the absence of the full period of market testing.	The Council disagrees with this suggestion. The 18 month period is required to ensure that all sites are robustly marketed. Any reduction in this period has the potential to undermine the purpose of the policy which seeks to ensure an adequate supply of employment land is available over the plan period.
<b>Introduction of new policy</b>	
Paragraph 3.4.1 should be removed from the SPG and the relevance of 3.4.2 remaining should be considered as both are introducing a further test beyond policy EC 4.	The Council considers that the wording of paragraph 3.4.1 and 3.4.2 should be removed and replaced as it introduces an additional test beyond that set out in policy EC4: Loss of Zoned Employment Land of the dPS
<b>Regional policy reference</b>	
Reference should be made to RDS and in particular first bullet point of page 12 which states that zoned employment land should be protected.	This SPG clarifies and elucidates policy EC4. No amendment is required.
<b>Consultee input on marketing strategy</b>	
Additional wording suggested to paragraph 3.5.6 regarding input from consultees on marketing strategy.	It is considered that there is merit in adding the additional wording regarding input from consultees on the marketing strategy.
<b>Timeframe conflict with marketing period</b>	
At para 3.5.6 reference to evidence that the tenant intends to move out should be removed as notices under the Business Tenancies Order can only be served 12 months or a minimum of 6 months before the lease expiry date.	It is considered that there is merit in removing wording from paragraph 3.3.5 relating to evidence that the tenant intends to move out.
<b>GDPR Issues</b>	
There may be confidentiality and / or GDPR issues in the council contacting interested parties.	It is accepted that there may be GDPR issues and recommends that this sentence relating to the council is removed from paragraph 3.3.8.

## Council response to key issues raised

### Evening and night-time economy

#### Summary of Responses

Two respondents made representations in respect of the Evening and night-time economy SPG. Of the comments submitted:

- One offered their **support** of policy TLC4;
- It was suggested that in order to protect hotel residents from **noise, vibration and light** acoustic measures would be required;
- The need for **Section 76 agreements** to ensure that any monetary contribution to an application delivers the required sound proofing measures was highlighted;
- Suggestion that potential receptors should be notified of a potential **noise** generating planning application, even if not with prescribed limits; and
- Minor **wording edits** including the updating of technical documents and providing clarity.

#### Responses Received

Reference	Respondent
SPG-R-05	Theatres Trust

Reference	Respondent
SPG-R-21	NIHE

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

Main Issue	Council Response
<b>Section 76 agreements</b>	
Section 76 agreements must ensure that any monetary contribution delivers the required sound proofing measures, i.e. if providing a financial contribution enforcement will be needed to ensure that the owners of noise generating uses install appropriate and adequate sound proofing before the occupation of new sensitive developments.	The role of S76 agreements in ensuring the noise sensitive receptor provides a financial contribution to the noise generating business if the new noise sensitive use cannot put noise mitigation measures in place.
<b>Noise</b>	
Although hotels can be considered a night-time use, acoustic measures should be required to ensure hotel residents are also not adversely affected by noise, vibration and light.	The council considers that the SPG, as written, provides enough clarification.
Applications should contain a clear indication of the location of receptors within the residential properties adjacent or within a defined distance of the source. All potential receptors should be notified of a potential noise generating planning application, even if not with prescribed limits.	The council will consult with environmental health who will prescribe the appropriate noise sensitive receptors for any application.
The first sentence of paragraph 3.1.8 requires further clarification – this is an important statement. What happens if a development does lead to background noise increase	The council agrees to the removal of reference to background noise as it is not required in the context of the wider paragraph.
It was suggested that bedrooms should not overlook streets with ENTE uses	It is considered that whilst each proposal will be assessed on its own

## Council response to key issues raised

Main Issue	Council Response
	merits, it is reasonable to encourage the consideration of placing bedrooms in quieter facades. Paragraph 3.2.5 amended to reflect this.
A question was asked in relation to paragraph 3.2.2 in terms of who is going to protect noise generating ENTE uses.	The council agrees that clarity is required here and has amended paragraph 3.2.2 to reflect that the council will seek to protect.
Minor wording edits suggested to strengthen paragraph 3.2.2 around existing uses and noise.	The council agrees that clarity is required and has amended the last sentence of paragraph 3.2.2 to state “the council will seek to protect”.
It was suggested that paragraphs 3.2.6 and 3.2.7 should be amended to help strengthen detail around noise impact assessments.	The council agrees that minor wording amendments would help clarify the guidance. Paragraph 3.2.7 has been updated to reflect this.
<b>Odour &amp; Lighting</b>	
Further clarification has been sought on other issues such as odour and lighting.	The council considers that the SPG only clarifies and elucidates policy. Additional issues cannot be added to the SPG as this would be introducing policy beyond that detailed in TLC4: Evening and night-time economy.
<b>Additional supplementary guidance</b>	
An additional technical supplementary guidance document on noise impact assessments should be developed.	The council would disagree that additional guidance is required, given that a NIA is a universal test that is widely understood and used in numerous development scenarios.
<b>Updating technical documents/guidance</b>	
Additional current/more up-to-date guidance suggestions provided for paragraph 3.2.10.	<p>The council considers that there is merit in signposting to the latest versions of the technical documents</p> <p>Not all of the technical documents suggested have been included in this amendment to paragraph 3.2.10 as they go above and beyond that covered in TLC 4</p>

## Council response to key issues raised

### Sensitive uses

#### Summary of Responses

Three respondents made representations in respect of the Loss of Zoned Employment Land SPG. Of the comments submitted:

- One respondent was **supportive** of a specific policy for sensitive uses in the SPG;
- A respondent also **supported** the distinction drawn between statutory nuisance amenity from a planning perspective.
- The **cumulative effects** of noise being prevented was raised;
- Any **noise** impact assessment should state that the primary / critical **receptor** location in assessing excessive noise would be the nearest residential property was raised; and
- A respondent stated that long term and permanent **outdoor seating licensing** guidance needs to be agreed.

#### Responses Received

Reference	Respondent
SPG-R-03	National Trust
SPG-R-17	IMTAC

Reference	Respondent
SPG-R-21	NIHE

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

Main Issue	Council Response
<b>Support</b>	
Support for specific policy for these sensitive uses in the SPG.	The council welcomes your comments.
The NIHE supports the distinction drawn between statutory nuisance and such activities, which also affect amenity.	The council welcomes your comments.
<b>Cumulative effects</b>	
The guidance should refer to the cumulative effects of noise being prevented e.g. concentration of accumulative noise to be avoided.	The SPG as drafted contains all the necessary detail and no amendment is required.
<b>Noise receptors</b>	
The guidance on noise impact assessments should state that the primary / critical receptor location in assessing excessive noise would be the nearest residential property.	There are other noise sensitive uses and it is not considered appropriate to refer to residential only.
<b>Outdoor seating licensing</b>	
Long term and permanent outdoor seating licensing guidance needs to be agreed.	There is no scope to introduce new policy at SPG stage.
<b>Planning conditions</b>	
The guidance relating to imposing a condition on the frying of foods should	It is accepted that the last sentence of paragraph 3.2.4 should be removed as it is rarely used in practice.

## Council response to key issues raised

Main Issue	Council Response
not be mentioned as it is rarely used in practice.	
<b>Sound reduction</b>	
Minor wording change has been suggested to the 3rd bullet point of paragraph 3.6.4 to help clarify sentence relating to sound reduction performance.	It is accepted that the deletions and additions to paragraph 3.6.4 enable clearer understanding of the issues.
<b>Deliveries and collections</b>	
The guidance at paragraph 3.6.4 should be amended to reference to commercial collections.	It is accepted that the deletions and additions to paragraph 3.6.4 enable clearer understanding of restrictions relating to servicing and collections.
The guidance at paragraph 6.2.13 should be amended to cover loading and unloading of deliveries.	The inclusion of the suggested minor wording edits helps strengthen the paragraph relating to pubs and nightclubs.
<b>Odour dispersal</b>	
The guidance at paragraph 3.6.8 should be amended to strengthen the section of odour dispersal.	It is accepted that the deletions and additions suggested to paragraph 3.6.4 enables clearer understanding of the issues in regard to odour dispersal and the document has been updated accordingly.
Reference to DAERA publication at paragraph 3.6.9 should be removed and replaced with most recent version of relevant industry guidance on the Control of Noise and Odour from Commercial Kitchen Exhaust Systems has been recommended.	It is accepted that the amended wording suggested helps strengthen paragraph 3.6.9 in relation to the relevant publication.
Reference to smells or fumes at paragraph 3.6.10 should be replaced with “odours” to reflect current industry terminology.	The suggested wording helps to ensure consistency with the latest terminology used.
Additional wording should be added to regarding extraction being 1 metre above ridge or 1 metres above eaves.	It is accepted that the amended wording suggested regarding extraction ducting helps strengthen paragraph 3.6.10.
<b>Statutory nuisance</b>	
The reference to statutory nuisance at paragraph 4.2.9 should be removed as Environmental Health’s powers are separate to planning.	The sentence relating to statutory nuisance should be removed given the distinction between statutory powers.
<b>Other</b>	
Reference to relevant policies for each sensitive use needs to be made more explicit in the document.	It is accepted that greater is clarity needed. An additional paragraph has therefore been added at 2.3.5 referencing the extracts from the relevant policies. The policy box below paragraph 3.3 have been moved to under paragraph 2.3.5. Extracts from the other relevant policies DES1- Principles of Urban Design and SP3- Improving Health and Wellbeing has been added as policy boxes below paragraph 2.3.5.

### Transportation

#### Summary of Responses

Twelve respondents made representations in respect of the Transportation SPG. Of the comments submitted:

- there was **support** for various aspects of the guidance including the need for separation between pedestrians, cyclists and motor traffic and the creation of accessible and inclusive environments;
- several related to **accessibility** and how this should be addressed through the planning application process;
- the need to consider distances from reserved parking provision was raised in relation to **car parking design**;
- a number related to issues concerning **cycle parking design** and **cycleway proportions** including the need for the cycling network and facilities to be inclusive and designed to accommodate the needs of all users;
- the need to address the provision of, and access to **electric vehicle (EV) charging infrastructure** was raised on several occasions;
- the status of **guidance** referred to within the document was queried. The potential to reference further relevant sources of guidance and the need for up-to-date regional guidance was also raised by a number of respondents;
- various issues were raised in relation to different aspects of **infrastructure** including how existing infrastructure will be taken into consideration and the approach to road layout design;
- it was suggested that **parking standards** should be justified by a realistic understanding of demand and that the guidance should provide details on the appropriate level of reserved parking provision;
- several related to the issue of **safety** including that the travel needs and safety concerns of non-car users are appropriately considered, particularly for those with mobility issues;
- it was queried as to how and when **Section 76 Agreements/Developer Contributions** can or should be used;
- a number related to the need for **separation/segregation** between pedestrians, cyclists and motor traffic and the extent to which this is achievable;
- issues were raised regarding the appropriateness of **shared surfaces** and the need to have an inclusive and safe environment;
- it was suggested that the section on the **Sustainable Transport Hierarchy** should focus primarily on travel modes and include reference to multi-modal sustainable journeys and mobility innovation;
- various issues were raised regarding **Transport Assessments** including their preparation, content and when they should be required; and
- a number related to the need for effective **Travel Plans** including when they should be required and the range of potential measures that should be considered.



**Responses Received**

Reference	Respondent
SPG-R-01	Individual - Diane Marks
SPG-R-03	National Trust
SPG-R-10	Consumer Council (NI)
SPG-R-17	IMTAC
SPG-R-21	NIHE
SPG-R-24	Belfast Harbour

Reference	Respondent
SPG-R-25	Titanic Quarter Ltd
SPG-R-26	Lacuna Developments
SPG-R-27	DfI - Roads (DP/TPMU/TICC)
SPG-R-28	Swinford Sirocco Ltd
SPG-R-29	Translink
SPG-R-30	DfI Roads (Blue-Green Team)

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

Main Issue	Council Response
<b>Support</b>	
Welcome that this guidance recognises and supports that the successful integration of transport and landuse is essential in achieving sustainable development objectives.	The Council welcomes the support for these aspects of the SPG.
Supportive of guidance recognising the need for separation between pedestrians and cyclists and between cyclists and other motor traffic.	
Welcome that this guidance supports the creation of accessible and inclusive environment.	
Welcome the recognition of the need for a 'connected network approach', the encouragement of 'end to end' multi-modal sustainable journeys and the importance of effective public transport interchanges.	
Support for the use of S76 agreements in expanding the Blue and Green network.	
<b>Accessibility</b>	
Design & Access Statements should detail mitigation measures relating to access issues.	Section 3.2.4 sufficiently covers what a Design & Access Statement should address.
Consideration of kerb and ramp arrangements at bus stops for safe access and egress.	Section 3.2.5 directs the reader to BS 8300 which provides guidance on bus stop design considerations. Section 3.2.5 has been amended to include reference to bus stops.
More prescriptive detail needed regarding accessibility.	It is not considered feasible to incorporate the full and wide range of detailed and prescriptive guidance

## Council response to key issues raised

Main Issue	Council Response
	currently in circulation but rather this SPG seeks to direct readers to where this guidance and best practice is available.
<b>Car Parking Design</b>	
Guidance on acceptable distances between reserved parking provision and development access points.	Section 3.5.11 has been amended to include reference to travel distance between reserved parking provision and building access points.
Additional detail on the dimensions of parking spaces.	This level of detail is not considered appropriate for this SPG. Section 3.5.2 makes reference to BS 8300 Part 1: External environment for further guidance.
<b>Car Parking Strategy</b>	
Consideration of the Belfast City Council Car Parking Strategy.	The Council's Car Parking Strategy and Action Plan has informed a number of policies within the Plan Strategy e.g. TRAN 8 and TRAN 9. It is of limited direct relevance to the policies covered by this SPG.
<b>Cycle Parking Design</b>	
Cycle parking provision needs to be accessible for all cycle users including those using non-standard or accessible cycles.	Section 3.1.27 makes reference to cycle parking provision needing to consider 'all types of cycle vehicle and all types of cycle user'.
Improving security of cycle parking by locating in view of live frontages.	This issue is addressed in Section 3.1.26.
Allow more aesthetic designs of cycle stand if they provide secure support.	Section 3.1.23 acknowledges that other types of cycle stand are not precluded as long as they are sufficiently functional.
<b>Cycleway Proportions</b>	
Where possible, cycle networks must be inclusive and designed to accommodate the needs of disabled cyclists and the dimensions of non-standard cycles.	Bullet point 1 of Section 3.1.12 has been amended to clearly state that the design of cycle networks should consider all cyclists.
Proposals for changes to overtaking law in NI similar to England and Wales.	This issue is not directly related to the Cycleway Proportions guidance contained in this SPG and is considered to be outside the remit of this SPG.
<b>Developer Responsibilities</b>	
Maintenance costs associated with the installation of any signal/pedestrian crossing as part of a planning application to be covered by the developer for ten years.	This issue is a matter for the developer/applicant and DfI Roads and is considered to be outside the remit of this SPG.

Main Issue	Council Response
<b>Electric Vehicle (EV) Charging Infrastructure</b>	
Guidance should address the need for greater provision of EV charging points.	Whilst the Council supports this sentiment it is not considered to be within the remit of this SPG. Policy TRAN 8 of the Plan Strategy identifies the need to consider parking provision for EVs with access to charging points in development proposals where appropriate.
New car parking or building development should incorporate the necessary infrastructure to accommodate the installation of charging points.	Requiring the necessary infrastructure to be incorporated into new development is considered to be a Building Control issue and is beyond the remit of this SPG.
Consideration of accessible charging infrastructure for people with disabilities or mobility issues.	Accessibility considerations for persons with a disability or impaired mobility is addressed throughout this SPG and would extend to accessibility to charging infrastructure.
The design of charging stations should be appropriate to the surrounding context.	The design of charging stations will be subject to consideration at the Development Management stage and as such does not require specific guidance within this SPG.
<b>Guidance</b>	
DfI, as the transport authority, reserves the right to introduce and use new and/or amended guidance.	The Council acknowledges the Department's role as the transport authority (Plan Strategy Section 9.4.3). The council will revise its published SPG should the need arise.
Status of Manual for Streets guidance in Northern Ireland.	The Manual for Streets is not formally adopted within NI and only applies formally in England and Wales. The SPG refers to this document as it provides established guidance on the design, construction, adoption and maintenance of new residential streets as well as the re-design of existing streets.
Supplement the existing guidance referenced in Section 2.2.	Section 2.2 has been amended to indicate that further sources of guidance are referenced throughout this SPG. Details of these together with other relevant guidance have been compiled in a new Appendix 1.
Include specific reference to Inclusive Mobility guidance in Section 3.1.15.	Section 3.1.15 has been amended accordingly.
Need for up-to-date regional guidance.	The updating of regional guidance is a matter for DfI as the transport authority.
Need for guidance relating to the use of e-scooters and e-bikes.	Whilst e-scooters and e-bikes are not specifically mentioned in this SPG the guidance set out with respect to creating safe environments for all users is still

## Council response to key issues raised

Main Issue	Council Response
	applicable. All SPGs will be subject to regular review and updated where necessary.
Need for SPG to be regularly reviewed and updated to reflect new legislation and standards.	All SPGs will be subject to review and shall be updated where necessary to reflect new legislation and standards.
<b>Infrastructure</b>	
Need a more flexible, joined-up approach to road layout design rather than a standard-focused design approach.	The Council considers that this SPG supports a policy direction which seeks to reduce reliance on the private car, emphasise the importance of active travel and the need to create accessible and safe environments for all.
Potential difficulty in complying with guidance in the context of existing buildings, footways etc.	It is acknowledged that existing buildings, infrastructure etc. will be a consideration when seeking to develop good active travel routes as part of a development proposal. Such issues will be considered at the Development Management stage.
Consultation with communities and organisations in the design of transport services and infrastructure.	DfI as the transport authority for NI are ultimately responsible for ensuring effective engagement and consultation in designing transportation services and infrastructure. The provision of transport infrastructure is a separate process requiring consultation with various consultees and stakeholders.
<b>Modal Options</b>	
Recognise need for viable, less sustainable modal options particularly for those with mobility issues or in more rural areas.	This issue is acknowledged in Section 1.1.5.
<b>Parking Standards</b>	
Guidance should include details on the appropriate level of reserved parking provision.	Policies TRAN 8 and TRAN 9 of the Plan Strategy address parking provision.
Parking standards should be justified by a realistic understanding of demand and lower levels of parking provision should be encouraged where appropriate.	Policies TRAN 8 and TRAN 9 of the Plan Strategy address parking provision.
Suggestion to remove the reference to negotiation in relation to cycle parking standards.	Accept that the removal of the reference to negotiation provides greater clarity. Section 3.5.14 has been amended accordingly.
<b>Policy Context</b>	
Suggestion that the Policy Prioritisation Framework set out in the ESTF is not utilised by DfI.	As worded, the content of Section 2.1.3 is accurate. Whether or not the Policy Prioritisation Framework is utilised by DfI is not considered to be a matter for this guidance.

Main Issue	Council Response
<b>Safety</b>	
Ensure that the travel needs and safety concerns of non-car users are appropriately considered.	The Council considers that this SPG supports a policy direction that seeks to reduce reliance on the private car, emphasise the importance of active travel and other more sustainable modes, and the need to create accessible and safe environments for all.
Safety and accessibility concerns associated with street furniture for all who walk and wheel.	This issue is addressed in Section 3.2.13.
Safety concerns regarding electric vehicles and those who need to be able to hear them.	This issue is not considered to be within the remit of this SPG.
<b>Section 76 Planning Agreements/Developer Contributions</b>	
Further elaboration needed on s76/Developer Contributions and when they will be required.	The Council considers that the role of Developer Contributions is adequately covered in this guidance and further elaboration is not necessary. Please refer to the Council's Developer Contributions Framework for further information
Developer Contributions should only be required where the Council/Dfl have definitive plans in place.	There is no legislative or policy basis which requires the Council or Dfl to have definitive plans in place in order to secure Developer Contributions.
<b>Separation/Segregation</b>	
Need for separation between cyclists and buses on bus lanes.	The separation of cyclists from motor traffic is addressed in Section 3.1.6.
Guidance lacks consistency in relation to the segregation of travel modes e.g. Section 3.1.11.	The relevant sentences within Section 3.1.11 reflect the recognition that whilst segregation is preferable it will not always be achievable.
Segregation of pedestrians, cyclists and motor traffic should be 'where possible' and shared use may be appropriate in some situations.	Development proposals are assessed on a case-by-case basis taking their individual merits into account. Whilst recognising this, it is important that separation between pedestrians, cyclists and motor traffic should be the preferred outcome. The insertion of 'where possible' may be detrimental to achieving this preferred outcome.
<b>Shared Surfaces</b>	
Safety and accessibility concerns relating to the use of shared surfaces and the need for kerb delineation.	Section 3.2.12 has been amended to emphasise that the design of shared surfaces will require careful consideration with regards to creating a safe environment. In seeking to create an inclusive environment an applicant will need to demonstrate consideration of issues which will impact on accessibility. This process should be evident in the Design and Access Statement and include, where appropriate, consideration of kerb heights.

## Council response to key issues raised

Main Issue	Council Response
<b>Sustainable Transport Hierarchy</b>	
The Sustainable Transport Hierarchy should focus specifically on travel modes and public transport should be above taxis in the hierarchy.	Figure 1 has been replaced to better reflect the travel aspect of the Sustainable Transport Hierarchy. Approaches which eliminate or minimise the need to travel are still referenced in Section 1.1.6.
The section on the Sustainable Transport Hierarchy should reference the potential contribution of multi-modal sustainable journeys and mobility innovation.	Additional text has been added to Section 1.1.7 making reference to multi-modal sustainable journeys and mobility innovation.
<b>Terminology</b>	
Provide a definition of 'wheeling' and ensure its consistent use throughout the SPG.	A footnote to Section 3.1.3 has been inserted to provide a definition of 'wheeling'.
<b>Transport Assessments (TA)</b>	
Appropriateness of thresholds for Transport Assessments.	The thresholds set out in Table 1 are taken from existing Dfl guidance on Transport Assessments. Dfl has not proposed any revision to these thresholds. Section 3.3.3 of the SPG indicates that a TA can be required for any size of development that has potential transport impacts and that proposals that do not meet the size thresholds may have sufficient transport impacts to require the completion of a TA. Section 3.4.3 also indicates that the scale of the proposed development and its potential for additional trip generation is a factor that can be taken into account when determining if a Travel Plan is required.
Inclusion of both Dfl Roads and Translink at scoping discussions/PAD stage.	Section 3.3.5 indicates that Dfl Roads, public transport providers and any other relevant parties can be involved at the scoping discussions/PAD stage.
Transport Assessment discussions should also cover the availability of data relating to the wider road and transport network.	Section 3.3.5 has been amended to include the consideration of this data.
Discussions on Transport Assessments should include consideration of incentives to encourage use of sustainable modes.	This aspect of discussion is more appropriate at the Travel Plan development stage.
The preparation of a TA should include assessment of the capacity, frequency and proximity of public transport.	Section 3.3.9 has been amended to include the consideration of these factors.

Main Issue	Council Response
Need to avoid the scenario where an approval not subject to a TA prevents further provision of public transport on larger zonings or sites.	Masterplanning or the phasing of larger zonings is established practice and should prevent this scenario from arising.
<b>Travel Plans</b>	
Need to mention specific types of Travel Plans including Residential and School Travel Plans, Service Vehicle Management Plans and Event Management Plans.	Section 3.4.2 addresses when a Travel Plan may be required. Service Vehicle Management Plans are referenced in Section 3.3.6. Events Management Plans are beyond the remit of this SPG.
Clarification as to what 'cumulative impacts' relates to in Section 3.4.3.	In this context 'cumulative impact' refers to taking account of committed and planned development within the vicinity that have the potential to put further demand on road capacity in the area.
Clarification of reference to 'national policies' in Section 3.4.3.	Bullet point 8 in Section 3.4.3 has been amended to reflect current regional policies.
Inference that Framework Travel Plans relate to commercial developments only.	A Framework Travel Plan may be appropriate depending on the scale and nature of the application particularly where the occupants are unknown and/or a development is to be phased. As such this type of Travel Plan is not restricted to proposals for commercial developments.
Encourage Travel Plans for all proposals that require a Transport Assessment Form.	Section 3.4.3 indicates that the scale of the proposed development and its potential for additional trip generation are factors that can be taken into account when determining if a Travel Plan is required.
Greater prioritisation of car clubs.	Section 3.4.11 makes reference to car clubs as soft measure which can be included within a Travel Plan. The promotion or prioritisation of car clubs is not a matter for this SPG.
Include incentivising public transport use as an example of a soft measure.	Section 3.4.11 has been amended to include the incentivising of public transport use as a soft measure.
Guidance should specify there may be a requirement for a S76 agreement.	Section 3.4.12 has been amended to indicate that both soft and hard measures identified in a Travel Plan may be subject to S76 agreement or Planning Condition as appropriate.
Some examples listed in Section 3.4.15 as measures which reduce the need to travel aren't relevant.	Section 3.4.15 has been amended accordingly.
Include the provision of new or enhanced public transport services as a soft measure.	This measure is identified in Table 3.

## Council response to key issues raised

### Waste infrastructure

#### Summary of Responses

One respondent made a representation in respect of the Waste Infrastructure SPG. Of the comments submitted:

- it was suggested that further guidance was needed in relation to **access considerations**;
- the issue of **bin storage** to the front of properties was raised as a concern;
- the need to fully consider the potential **environmental impacts** of new waste management development was emphasised;
- it was recommended that various aspects of **European, regional and local policy and guidance** should be updated and supplemented where necessary;
- the availability of additional Council **guidance** on waste storage was highlighted, as was the need for this to be considered in conjunction with existing regional guidance;
- a number related to the **scope** of the SPG and the extent to which it should address other waste-specific issues; and
- it was suggested that the rationale for **Waste Management Plans** should be provided.

#### Responses Received

Reference	Respondent
SPG-R-03	National Trust

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

Main Issue	Council Response
<b>Support</b>	
Welcome that this guidance supports the promotion of a circular economy.	The Council welcomes the support for this aspect of the SPG.
<b>Access considerations</b>	
Section 4.14 requires additional information and guidance in relation to access considerations.	Section 4.14 has been updated to provide additional guidance on access considerations and general considerations for Waste Collection Points.
No clear rationale for 'centralised collection points' and 'reducing the need for conventional refuse vehicles' in Table 2 and Section 4.14 and the potential implications thereof.	References to 'centralised collection points' and 'reducing the need for conventional refuse vehicles' have been removed from the SPG.
<b>Bin Storage</b>	
The storage of bins to the front of properties should not be considered acceptable.	The wording of Section 4.9.2 has been amended to reflect that bin storage to the front of properties is not appropriate.



Main Issue	Council Response
<b>Environmental Impacts</b>	
Thorough consideration of the environmental impacts of new waste management development is essential.	Consideration of the environmental impacts of new waste management development is addressed in Policy W1 of the Plan Strategy. Sections such as 2.3.5-6, 3.1 and 3.2 of this SPG provide further guidance on this important aspect of waste management development.
<b>European Policy and Guidance</b>	
Sections in Appendix 1 on the Landfill Directive and the EU Circular Economy Package should be updated to reflect the current position.	The relevant sections in Appendix 1 have been updated accordingly.
<b>Guidance</b>	
Further Council guidance has been published in relation to waste storage for commercial developments.	The relevant sections have been updated to reference this additional source of guidance.
The Council's own suite of supplementary waste storage guidance should be used in conjunction with the Local Government Waste Storage Guide for NI.	The relevant sections have been updated to confirm that both these sources of guidance should be used where appropriate.
Remove instruction which requires applicants to liaise directly with the Council's Waste Management Team.	The removal of this instruction is accepted as the suite of existing supplementary waste guidance referred to in this SPG adequately covers the various capacity and design aspects of waste storage areas and waste collection points as well as the preparation of Waste Management Plans.
Appendix 2 should include a table for 1100l capacity containers.	A new Table 10 has been inserted into Appendix 2 and the previous Table 10 has been renamed Table 11.
<b>Local Policy and Guidance</b>	
Section on the Waste Agenda Framework in Appendix 1 should be updated to reflect the current position.	This section in Appendix 1 has been updated accordingly.
<b>Regional Policy and Guidance</b>	
Reference should be made to the NI Food Waste Regulations.	Section 4.5.4 and Appendix 1 has been updated to make reference to the Food Waste Regulations.
Appendix 1 should include reference to the Climate Change Act (Northern Ireland) 2022.	Appendix 1 has been updated to include reference to the Climate Change Act.
<b>Scope</b>	
Issue of unapproved facilities such as clothing banks should be addressed by this SPG.	This issue is outside the remit of this SPG. Any potential breaches of planning controls can be reported to Planning Enforcement.

## Council response to key issues raised

Main Issue	Council Response
Detail in Section 3.3.4 regarding the role of HM Customs and Excise and Landfill Tax is not necessary.	Section 3.3.4 has been amended to remove reference to the role of HM Custom and Excise.
<b>Terminology</b>	
Use of the term 'waste storage and collection facilities' is potentially confusing.	To provide clarity the term 'waste storage areas and waste collection points' is now used throughout the document.
A definition of a 'circular economy' should be included.	A definition of a 'circular economy' has been added to the glossary in Section 5.
<b>Waste Management Plans</b>	
Reference should be made to the rationale for Waste Management Plans and the checklist in Table 2 should align with regional guidance.	Section 4.3 has been updated to provide a rationale for Waste Management Plans and the checklist in Table 2 has been amended to align with existing regional guidance.

## Council response to key issues raised

### Planning and flood risk

#### Summary of Responses

Four respondents made representations in respect of the Planning Flood Risk SPG. Of the comments submitted:

- There was a **welcome** for the guidance and support for the precautionary approach, including for future climate change predictions.
- Continued commitment to **SuDS measures** was welcomed.
- It was noted that the guidance **closely aligns** with current flood risk policies, including the Strategic Planning Policy Statement for NI (SPPS) and PPS15.
- One submission recommended revisions of some of the **legislative context** to provide greater clarity or updates where required, including to the Floods Directive Regs.
- One submission recommended a **revised section on controlled reservoirs** that incorporates new technical guidance issued by DfI Rivers.
- One submission recommended updating text at **Appendix D (SuDS)** to take account of recent public consultation on proposals for new enabling powers.
- One submission recommended proof of securing **affordable insurance** to be included with planning application documentation (SPG Appendix C).

#### Responses Received

Reference	Respondent
SPG-R-03	The National Trust
SPG-R-08	DFI Rivers

Reference	Respondent
SPG-R-16	DfI Water & Drainage Policy Division and LWWP
SPG-R-21	NIHE

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

Main Issue	Council Response
<b>Support</b>	
Welcome the policy approach and SPG, noting alignment with current flood risk planning policies, and supporting the precautionary approach and consideration of climate change implications.	We welcome the support for the policy and supplementary guidance.
Welcome the continued commitment to SuDS measures (Appendix D of SPG).	We welcome the support of our promotion of SuDS measures.
<b>Legislative context</b>	
Suggestion of additional clarifying wording under the Water Environment (Floods Directive) Regulations (Northern Ireland) 2009.	Agreed. Additional wording added at para 2.1.4.
Suggest reference to EU Water Framework Directive be updated to reference local regulations - The Water	Agreed. Revised wording to para 2.1.5.

## Council response to key issues raised

Main Issue	Council Response
(Amendment) (Northern Ireland) (EU Exit) Regulations 2019.	
<b>Controlled reservoirs</b>	
Suggestion of revised section and wording on controlled reservoirs to incorporate updated technical guidance issued by DfI (TGN 25).	Agreed. Para 2.3.6 and section 4.10 revised text to take account of DfI updated guidance for controlled reservoirs.
<b>Property insurance</b>	
Suggested inclusion in Appendix C that developers should demonstrate that affordable property insurance can be obtained and submit evidence with planning application.	Whist acknowledged as an important consideration for developers and occupiers, insurance arrangements are outside the scope of this SPG and the planning process.
<b>SuDS update</b>	
Suggested revision of Appendix D (SuDS) where it states that 'no further legislation is being considered at this stage.' Should be updated to refer to recent consultation on an enabling power to introduce future guidance/legislation to set out arrangements for approval and maintenance of SuDS.	Agreed. Appendix D has been updated accordingly, including details of the proposed new powers for DfI and NI Water. Note that a separate SPG has been prepared for SuDS and we have amended Appendix D of this SPG to signpost to it and avoid duplication.

## Sustainable drainage systems (SuDS)

### Summary of Responses

Five respondents made representations in respect of the Sustainable Drainage Systems (SuDS) SPG. Of the comments submitted:

- All **welcomed and supported** the council's commitment to increasing the use of SuDS, including through the promotion of integrated SuDS to achieve multiple benefits.
- Four respondents acknowledged the current absence of a **SuDS approval authority** and raised the need to **establish clear roles and responsibilities**.
- Most acknowledged the need for **partnership approach** to manage our water systems.
- Four raise issue of ongoing **maintenance roles and responsibilities**.
- Some suggested extra **clarity on SuDS Management Plans**.
- Some suggested a need for more **detailed/technical guidance**.

### Responses Received

Reference	Respondent
SPG-R-03	The National Trust
SPG-R-08	DfI Rivers
SPG-R-14	DfC – DfC – DfC Belfast Regeneration Directorate, Public Realm Team

Reference	Respondent
SPG-R-16	DfI Water & Drainage Policy Division and LWWP
SPG-R-21	NIHE

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

Main Issue	Council Response
<b>Support</b>	
Support SuDS policy, including recognition of multiple benefits of soft SuDS, and welcome further guidance contained in the SPG to assist policy implementation.	The Council welcomes support for the policy and supplementary guidance.
<b>Approval roles and responsibilities</b>	
Current absence of a SuDS approval authority and a need to establish clear roles and responsibilities between authorities and wider interests.	We acknowledge the current absence of statutory approval authority and note that this is the subject of ongoing consideration by government departments. This is outside the scope of the SPG. However, in accordance with policy ENV5, we are committed to promoting a SuDS approach in new development and have provided additional clarity at section 6.7 in relation to how proposals will be assessed.
Offer of assistance from Stormwater Management Group and DfI Rivers to Council and developers relating	We welcome the offer of continued assistance and partnership approach to help secure successful implementation of SuDS.

## Council response to key issues raised

Main Issue	Council Response
to SuDS proposals pending statutory clarification of roles.	
Query whether all development is expected to include SuDS measures.	In accordance with policy ENV5, there is an expectation that SuDS measures will be incorporated in new built development as appropriate.
Suggestion that Dfl Living With water Programme (LWWP) be added to the consultation list at para 6.6.2.	We have added Dfl LWWP to para 6.6.2.
<b>Management roles and responsibilities</b>	
Clarification of ongoing management and maintenance roles and responsibilities.	We consider that, having particular regard to the types of SuDS being promoted, maintenance arrangements can generally be resolved through the planning process, including through normal landscape and property maintenance arrangements. A planning condition and/or agreement may be used to secure future arrangements where appropriate. We have provided additional clarity at section 6.8 and para 11.2.4.
<b>Additional detailed/technical guidance</b>	
Suggested need for more detailed/technical guidance.	This SPG is not intended to provide full technical or detailed guidance on SuDS measures. Such guidance is readily available from other sources. Nevertheless, signposting is included to other available guidance, including the technically detailed CIRIA SuDS Manual.
An explanation is needed on what is meant by 'two stage' SuDS treatment.	We have provided further explanation of this, including in the glossary.

**Trees and development**

**Summary of Responses**

Three respondents made representations in respect of the Sustainable Drainage Systems (SuDS) SPG. Of the comments submitted:

- All **welcomed** the policy approach and guidance.
- One stated a need to reference the '**historic environment**' as trees enhance local architectural character and setting of listed buildings.
- One suggested that the **issue of tree removal** before planning application submission should be addressed in the guidance.
- One suggested the inclusion of **planning conditions** for longer term maintenance of trees & hedges.

**Responses Received**

Reference	Respondent
SPG-R-03	The National Trust
SPG-R-20	DfC Historic Environment Division

Reference	Respondent
SPG-R-21	NIHE

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

Main Issue	Council Response
<b>Support</b>	
Support policy TRE1 and welcome further guidance contained in the SPG to assist policy implementation.	The Council welcomes support for the policy and supplementary guidance.
<b>Tree removal</b>	
Suggests the issue of tree removal before planning application submission could be addressed in the guidance, requiring replacement planting as part of planning decision.	We acknowledge the importance of protecting trees, including in advance of new development proposals. However, BCC cannot control the removal of trees, other than those already specifically protected (e.g.: by TPO or in conservation area), under current legislative provisions. Nevertheless, the new LDP Policy TRE1 seeks a net gain in the number of trees through the planning application process.
<b>Historic environment</b>	
1.2.1 Suggestion to specifically note importance of trees to the ' <i>historic environment</i> '.	Agree: reword to 'Trees and landscaping are vital components of the built, historic and natural environment.'

## Council response to key issues raised

Main Issue	Council Response
<b>Management/maintenance</b>	
5.1.1 A planning condition could be attached to planning permission to ensure the long term maintenance of mature trees and hedgerows.	Agree: Development management can consider appropriate conditions, including for maintenance or management plans. Add reference to state that 'management plans may be subject to planning conditions'.



## Appendix A: Respondents

The following organisations / individuals provided a response to the consultation on the proposed SPG documents:

### Individual

- Diane Marks
- John Graham
- Neil Mathews

### Non-departmental public body

- Consumer Council (NI)

### Private Sector

- Belfast Harbour
- Bywater Properties, Southbank Square, MRP, Wirefox
- Clanmil Housing Group
- Co-Ownership Housing Association
- Lacuna Developments
- MBA Planning
- Swinford Sirocco Ltd.
- Titanic Quarter Ltd.
- Translink
- Turley

### Professional body

- Anonymous – Respondent No 2
- Chartered Institute of Housing

### Statutory

- DfC - Affordable Rent Branch
- DfC - Historic Environment Division
- DfC – DfC Belfast Regeneration Directorate, Public Realm Tea
- DfI - Water & Drainage Policy Division and LWWP
- DfI – Rivers
- DfI - Roads (DfI - DP/TPMU/TICC)
- DfI Roads (Blue-Green Team)
- NI Housing Executive (NIHE)

### Third Sector

- Belfast Civic Trust – David Flinn
- IMATC
- MAG for Architecture and the Built Environment
- National Trust
- NI Federation of Housing Associations (NIFHA)
- PPR Project
- Theatres Trust

