



# Belfast Local Development Plan

**Sustainability Appraisal** of the Draft Plan Strategy 2035  
Incorporating Strategic Environmental Assessment

**Sustainability Appraisal Report** August 2018 – **APPENDIX 12**



**Belfast**  
City Council

Energising  
**Belfast**







## Appendix 12

### Audit Trail of Sustainability Appraisal

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The following table provides a fully detailed audit trail of significant changes made through the plan-making process, and how the SA has influenced decision making.



Preferred Option (POP)	Draft Plan Strategy Policy (DPS)	Key changes made / actions taken through SA Process
<b>STRATEGIC POLICIES</b>		
<p><b>GR1: Supporting economic growth preferred option</b></p> <p>LDP policies will be based on ambitious growth aspirations, with appropriate population growth, employment land and residential development delivered to help Belfast compete with other cities across the UK, supporting a greater level of inward investment and strengthening the regional economy. This means over the plan period the LDP will:</p> <ul style="list-style-type: none"> <li>• Ensure a supply of sufficient employment land to support the creation of c. 46,000 additional jobs;</li> <li>• Seek to grow Belfast’s population by 66,000, increasing the population to over 400,000 by2035; and</li> <li>• Make provision for the development of 37,000 new homes, delivered at an average rate of 1,600-1,800 dwellings per year, phased to align with infrastructure capacity and provision.</li> </ul>	<p><b>SP1: Growth Strategy</b></p> <div data-bbox="719 387 1339 911" style="background-color: #0070C0; color: white; padding: 10px;"> <p>The growth strategy for the LDP can be summarised as follows:</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Support <b>46,000</b> additional jobs</p> </div> <div style="text-align: center;">  <p>Our city is home to an additional <b>66,000</b> people</p> </div> </div> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 10px;"> <div style="text-align: center;">  <p><b>550,000m<sup>2</sup></b> of employment floor space <small>(B-Use Class) 2020-2035</small></p> </div> <div style="text-align: center;">  <p><b>31,600</b> additional homes 2020-2035</p> </div> </div> </div>	<ul style="list-style-type: none"> <li>• SP1 sets out the proposed additional floor space requirements over the plan period - 550,000m2 for B-use class. This combines POP preferred option VE1 with GR1.</li> </ul>
<p><b>LP10: Community cohesion preferred option</b></p> <p>The LDP will include an over-arching strategic policy to encourage all new development to promote community</p>	<p><b>SP4: Community cohesion and good relations</b></p> <p>The council will support development that maximises opportunities to build strong, cohesive communities and that makes a positive contribution to good relations.</p>	<ul style="list-style-type: none"> <li>• <b>Note:</b> The POP stated that the Plan ‘will include an over-arching strategic policy to encourage all new development to make a positive contribution to community relations’. However, the DPS introduces two new</li> </ul>

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<p>cohesion and make a positive contribution to community relations. This approach could be to address, through supplementary guidance, site specific masterplans or development briefs that ensure proposals are considered in their broader context.</p> <p>The approach will facilitate development that contributes to a more coherent urban form by promoting connected developments that facilitate accessibility for all communities and policy will encourage permeable mixed-use, mixed-tenure design and layouts to support shared neighbourhoods and facilities.</p>		<p>operational policies in volume 2 – CGR1 (Community Cohesion and Good Relations) and CGR2 (Meanwhile uses in interface areas). These policies continue the overall direction of travel set by strategic policy SP4.</p>
<p>N/A</p>	<p><b>SD2: Settlement Areas</b></p> <p>Within Belfast City, the council has designated the following settlement areas to apply the council’s plan policies:</p> <ul style="list-style-type: none"> <li>• Belfast City Centre;</li> <li>• Inner city Belfast;</li> <li>• Outer Belfast;</li> <li>• Belfast Harbour Estate;</li> <li>• District centres;</li> <li>• Local centres;</li> <li>• City corridors; and</li> <li>• Rail stations and halts.</li> </ul>	<ul style="list-style-type: none"> <li>• The DPS has designated 8 character areas within Belfast. These areas have distinct functions based on their existing development patterns. The designations enable thematic policies to be tailored to each area, in the interests of sustainable development.</li> </ul>

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<b>SHAPING A LIVEABLE PLACE</b>																										
<p><b>LP1: Accommodating New Homes preferred option</b></p> <p>In order to support the ambitious growth aspirations for the city, the LDP will allocate sufficient land to accommodate 37,000 new housing units during the Plan Period in accordance with the following priorities:</p> <ul style="list-style-type: none"> <li>Increasing the density of housing development across the city of Belfast, focussing the highest density of development on the city centre and other locations which benefit from high accessibility to public transport facilities;</li> <li>Prioritising the re-use of previously developed land by setting an appropriate target for housing development on 'brownfield' land and encouraging the redevelopment of appropriate locations to contribute to urban regeneration;</li> <li>Concentrating growth within the existing settlement limits of the Belfast city urban area;</li> </ul>	<p><b>HOU1: Accommodating New Homes</b></p> <p>There is a requirement for 31,660 new homes in Belfast over the period 2020-2035. This will be delivered in accordance with the requirements set out in the following table.</p> <table border="1" data-bbox="696 518 1366 1157"> <thead> <tr> <th colspan="2">Settlement / Area</th> <th>Net additional dwellings (2020-2035)</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Belfast City</td> <td>Belfast City Centre</td> <td>8,000</td> </tr> <tr> <td>Belfast Harbour Estate</td> <td>3,500</td> </tr> <tr> <td>Rest of Belfast City</td> <td>18,100</td> </tr> <tr> <td><i>Belfast City total</i></td> <td>29,600</td> </tr> <tr> <td rowspan="4">Small Settlements</td> <td>Edenderry</td> <td>40</td> </tr> <tr> <td>Hannahstown</td> <td>0</td> </tr> <tr> <td>Loughview</td> <td>20</td> </tr> <tr> <td><i>Small settlements total</i></td> <td>60</td> </tr> <tr> <td>Windfall</td> <td></td> <td>2,000</td> </tr> </tbody> </table> <p>The housing requirement will be delivered in accordance with the following indicative average annual rates:</p> <ul style="list-style-type: none"> <li>2020/21–2024/25 – an average of 1,100-1,300 dwellings completed per annum</li> </ul>	Settlement / Area		Net additional dwellings (2020-2035)	Belfast City	Belfast City Centre	8,000	Belfast Harbour Estate	3,500	Rest of Belfast City	18,100	<i>Belfast City total</i>	29,600	Small Settlements	Edenderry	40	Hannahstown	0	Loughview	20	<i>Small settlements total</i>	60	Windfall		2,000	<ul style="list-style-type: none"> <li>Four separate policies created – HOU1, HOU2, and HOU4 (refer middle column)</li> <li>The DPS outlines requirement for 31,660 new homes whereas POP stated the aspiration to allocate land to accommodate 37,000 new housing units. Reasons for difference: <ul style="list-style-type: none"> <li>The <b>37,000</b> refers to that set out in the Belfast City Population and Housing Growth Study under scenario 2 - supporting baseline economic growth – However this was over 21 years (2014-35). Adjusting to the 15 year plan period 2020-35 and accounting for the shortfall between 2014 and 2020 gives a total of 32,800.</li> <li>Following the POP, the Council commissioned an Urban Capacity Study to demonstrate the feasibility of supplying sufficient land to accommodate the level of housing growth proposed. This study used the urban footprint as a basis for assessing sites for development. The headline figure identified was 28,684 for the whole city. Applying a 70/30 ratio of housing to employment on mixed use sites across the city gives a yield of 27,163. Adding a windfall allowance and including sites outside the urban footprint (some of which have approval) gives a total <b>31,200</b>.</li> </ul> </li> <li>Annual average figures for delivery of housing deemed too precise – broad ranges over 3</li> </ul>
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<ul style="list-style-type: none"> <li>Identifying opportunities for developments on the edge of settlements, but avoid any development in areas that could lead to the coalescence of our small settlements into the larger urban area; and</li> <li>Restricting housing development in the open countryside.</li> </ul>	<ul style="list-style-type: none"> <li>2025/26–2029/30 – an average of 2,100-2,300 dwellings completed per annum</li> <li>2030/31–2034/35 – an average of 2,700-2,900 dwellings completed per annum</li> </ul>	<p>phases created, in line with 5 year supply requirement. Whilst the detailed breakdown of delivery of these figures was included in the original HOU1 table, it has been removed to the justification section as it is more relevant to monitoring of the plan policy as opposed to delivery.</p>
	<p><b>HOU2: Windfall Housing</b></p> <p>There is a presumption that all new housing development within the plan area will be delivered on previously developed land within the existing urban footprint. Land will be prioritised and zoned within the local policies plan in accordance with this principle.</p> <p>Planning permission will be granted for housing development on sites within the urban footprint which are not zoned for housing or mixed use (to include an element of housing), where the following criteria are met:</p> <ol style="list-style-type: none"> <li>The site is suitable for housing development;</li> <li>The location is accessible and convenient to public transport and walking and cycling infrastructure; and</li> <li>Provision is made for any additional infrastructure required as a result of the development, including its cumulative impact alongside committed and planned housing development.</li> </ol> <p>Planning permission will be subject to proposals meeting all other policy requirements.</p>	<ul style="list-style-type: none"> <li>HOU2 created in respect of brownfield development / windfall housing. No brownfield target set – 60% as per RDS was considered too low. Historically, Belfast has been achieving over 90% development on brownfield, however to state a figure of 90% would assume that 10% greenfield would be acceptable. Therefore HOU2 outlines presumption that all new housing development will be delivered on previously developed land.</li> <li>This policy did originally incorporate the sequential approach, however this was subsequently removed following consultation with NIHE, leaving a revised windfall policy, the issue of the sequential approach adequately covered by the SPPS.</li> </ul>
	<p><b>HOU4: Density of Residential Development</b></p> <p>Planning permission will be granted for residential development proposals which are brought forward in accordance with density bands set out by character</p>	<ul style="list-style-type: none"> <li>HOU4 outlines the proposed density bands by character area applied to residential developments over the plan period. The importance of achieving higher densities</li> </ul>



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	area, to be used a guide and subject to meeting all other policy requirements.	given the ambitious growth aspirations determined the need for a clear, standalone policy.
<p><b>LP2: Affordable Housing preferred option</b></p> <p>Our preferred option is to require a percentage of all new homes in larger developments to be affordable. Local development plan policies will be developed to ensure that affordable housing:</p> <ul style="list-style-type: none"> <li>• Meets the affordable housing needs of the District in terms of size, type and tenure (including rental and forms of owner occupation);</li> <li>• Is genuinely affordable in relation to housing costs and local household incomes;</li> <li>• Is retained as affordable housing;</li> <li>• Is integrated with general needs housing within mixed tenure developments; and</li> <li>• Meets certain standards in terms of internal space and external design.</li> </ul> <p>The exact level set will need to be informed by an up to date Strategic Housing Market Assessment or Local Housing Need Assessment and should involve a mix of social housing, affordable housing and intermediate housing options.</p>	<p><b>HOU5: Affordable Housing</b></p> <p>Planning permission will be granted for residential development on sites greater than 0.1 hectares and/or containing 5 or more dwelling units where a minimum of 20% of units are provided as affordable housing.</p> <p>Affordable housing should consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, regard will be had to an up to date analysis of demand, including housing stress and prevailing housing need.</p> <p>The affordable housing should be 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.</p> <p>Where it can be demonstrated that it is not sustainable or viable for a proposed development to meet the requirements of this policy in full, the council will consider suitable alternatives on a case-by-case basis.</p> <p>Affordable housing will be secured by way of section 76 planning agreement, which should be in place in advance of planning permission being granted.</p>	<ul style="list-style-type: none"> <li>• The overall direction of travel is broadly the same, however there have been some important changes as below:</li> </ul> <p><b>Definition</b></p> <p>NIHE disagreed with the initial inclusion of low cost market housing in the definition of affordable housing and suggested it should be social and intermediate only, tied to delivery by housing associations in accordance with the common waiting list. Reference to low cost owner occupied and affordable rent have been removed from the draft policy.</p> <ul style="list-style-type: none"> <li>• <b>Meeting held with DfC March 2018</b> - Definition of affordable housing as set out in policy justification was revised in line with the DfC draft definition. <ul style="list-style-type: none"> <li>a) social housing and intermediate housing as defined in the SPPS;</li> <li>b) reference to 'rent to own' being at pilot stage and noting examples from other jurisdictions – equity loans, affordable rent &amp; discount market sale housing – stating that the definition of intermediate housing may be expanded in the future to include these and other innovative products.</li> </ul> </li> </ul>

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	<p>Any proposal for housing that is considered to be artificially dividing a larger site to circumvent the affordable housing requirement will not be permitted. Where a concept masterplan is provided to demonstrate the comprehensive planning of such a site and how the full affordable housing obligations will be met, partial development may be permitted if the affordable housing element can be secured by way of s76 planning agreement. This will also allow for the phased development of larger sites.</p>	<p><b><u>Threshold</u></b></p> <ul style="list-style-type: none"> <li>• The 'larger developments' threshold referred to in LP2 of the POP was proposed in draft policy HOU5 as 5 units or more on 0.1ha or more (as opposed to 10 units on 0.25ha or more, the UK standard). This threshold took account of viability concerns on smaller schemes and aligns with Belfast's land supply profile, which is made up of a significant number of smaller sites.</li> <li>• The DSD consultation exercise on 'Developer Contributions for Affordable Housing' used a threshold of 5 units or more noting that the impact on smaller developers would be lessened. The report also recognised the potential for threshold avoidance, which has been taken into account in the wording of policy HOU5.</li> </ul> <p><b><u>Proportion</u></b></p> <ul style="list-style-type: none"> <li>• The 'percentage' of all new homes as set out in LP2 of the POP was proposed in the draft policy as 20%. This was determined based on three main sources of information: <ul style="list-style-type: none"> <li>a) Housing Market Analysis, BCC update, September 2017, NIHE</li> <li>b) Developer Contributions for Affordable Housing in Northern Ireland – Report of Study, 2015, Three Dragons</li> <li>c) Historic completions</li> </ul> </li> </ul>

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		<p>There were discussions about the threshold with elected representatives and whether this should be altered, however no changes were made.</p> <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>The only significant change from the POP is the reference in HOU5 to tenure blind design: <i>'The affordable housing should be 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'</i>.</li> </ul> <p>HOU5 also includes reference to <b>'viability' and 'sustainability'</b> – thereby enabling a holistic look at development viability before exploring other alternatives. Following concerns over the practicality of off-site affordable housing provision and over workable mechanisms for the use of commuted sums, the policy was amended to refer to <b>'suitable alternatives on a case-by-case basis'</b>.</p>
<p><b>LP3: Ensuring an appropriate mix of housing preferred option</b></p> <p>The Local Development Plan will include appropriate policies to support a mix of housing units being delivered over the plan period – in terms of size, types and tenures – to help meet the needs of the projected population (as identified through the</p>	<p><b>HOU6: Housing Mix</b></p> <p>Planning permission will be granted for new residential developments on sites greater than 0.1ha and/or containing 5 or more dwelling units where the proposed development provides a suitable mix of house types and sizes to promote choice and assist in meeting community needs. Provision should be made in particular for smaller homes across all tenures to meet future household requirements. The exact mix of house</p>	<ul style="list-style-type: none"> <li>HOU6 introduces a threshold (5 or more units on sites greater than 0.1ha) where developments will have to provide a suitable mix of house types and sizes to promote choice and assist in meeting community needs. This makes the policy consistent with the affordable housing threshold in HOU5.</li> </ul>

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<p>latest local housing market analysis and future population projections). This will include:</p> <ul style="list-style-type: none"> <li>• A requirement to help deliver mixed and balanced communities; and</li> <li>• An appropriate mix of housing specified in relation to key housing land allocations and development opportunity sites to help promote choice and assist in meeting community needs.</li> </ul>	<p>types and sizes will be negotiated with developers on a case by case basis, taking account of prevailing housing need, site location and size, specific development characteristics and the creation of balanced and sustainable communities.</p> <p>The requirement for a mix of house types does not apply to single apartment developments.</p>	<ul style="list-style-type: none"> <li>• HOU6 introduces an exception to the requirement for a mix of house types for single apartment developments – it is considered that adequate provision can be made through an appropriate tenure mix (as required under HOU5) and by including different sized units.</li> </ul>
<p><b>LP4: Specialist accommodation for older people preferred option</b></p> <p>The Local Development Plan will contain specific policies to address the most acute needs of the community as identified in an up-to-date strategic housing market. This will include:</p> <ul style="list-style-type: none"> <li>• <b>Homes for older people</b> – Setting locational criteria to ensure specialist housing for older people, including retirement villages and care-related villages, will provide ease of access to relevant services and facilities such as shops, public transport routes and health facilities. Proposals will need to be accompanied by evidence that the homes or bed</li> </ul>	<p><b>HOU7: Adaptable and Accessible Accommodation</b></p> <p>All new homes should be designed in a flexible way to ensure that housing is adaptable throughout all stages of life, maximising the ability for occupants to remain in their homes and live independent lives for as long as possible.</p> <p>To help deliver adaptable and accessible homes, planning permission will be granted for new housing subject to a number of criteria based on the Lifetimes Homes Standards (a-f).</p> <p>In addition, for all residential developments of 10 units or more, planning permission will be granted where at least 10% of units are wheelchair accessible, designed in accordance with a number of criteria based on the HAG wheelchair design standards (g-o).</p> <p><b>HOU8: Specialist residential accommodation</b></p> <p>Planning permission will be granted for specialist residential accommodation, including retirement villages</p>	<ul style="list-style-type: none"> <li>• Following the POP consultation on LP4, three policies were initially drafted – HOU6 (Lifetime Homes), HOU7 (Wheelchair accessible housing) and HOU8 (Specialist Residential Accommodation). HOU6 and HOU7 were subsequently combined into one policy entitled Adaptable and Accessible Accommodation (HOU7).</li> <li>• At a housing working group meeting in October 2017, NIHE and BCC agreed that the DPS should incorporate a policy on wheelchair housing – reference was made to the London and Glasgow Plans and taking account of the NIHE HMA Belfast wheelchair applicant list.</li> <li>• On review, it was noted that many of the Lifetime Homes Standards (LHS) lie outside the remit of planning control – only the relevant ones were brought into HOU7 (criteria a-f).</li> </ul>

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<p>spaces meet identified community needs.</p> <ul style="list-style-type: none"> <li>• <b>Lifetime Homes</b> – Requiring an appropriate proportion of new homes on strategic housing sites to be built to Lifetime Home Standards so that they are adaptable enough to match changing needs of people throughout their lifetime.</li> </ul>	<p>and care-related facilities, where the following criteria are met:</p> <ol style="list-style-type: none"> <li>a. The homes and/or bed spaces to be provided meet community needs demonstrated through a statement of specialist housing need; and</li> <li>b. The proposals will deliver convenient access to relevant local services and facilities, including local shops, public transport routes and health facilities.</li> </ol> <p>Proposals for the improvement of existing specialist accommodation, including sheltered housing, extra care housing, nursing homes and residential care homes shall also be supported where these criteria are met. This will be subject to meeting all other policy requirements.</p> <p><b>HOU8: Specialist residential accommodation</b></p> <p>Planning permission will be granted for specialist residential accommodation, including retirement villages and care-related facilities, where the following criteria are met:</p> <ol style="list-style-type: none"> <li>c. The homes and/or bed spaces to be provided meet community needs demonstrated through a statement of specialist housing need; and</li> <li>d. The proposals will deliver convenient access to relevant local services and facilities, including local shops, public transport routes and health facilities.</li> </ol> <p>Proposals for the improvement of existing specialist accommodation, including sheltered housing, extra care housing, nursing homes and residential care homes shall also be supported where these criteria are met. This will be subject to meeting all other policy requirements.</p>	<ul style="list-style-type: none"> <li>• At POP consultation stage, a number of respondents advocated that the LHS should be applied to all new housing across tenures (although it is noted other respondents did not want prescriptive requirements). Policy HOU7 a) to f) therefore apply to <b>all</b> new housing.</li> </ul> <p>Some respondents at POP stage said that the proposed approach to specialist accommodation was too restrictive and should cater for all those with specialist needs, not just older people – therefore HOU6-8 are applicable to everyone, not just older persons.</p>

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<p><b>LP6: Shared Housing Provision preferred option</b></p> <p>The Local Development Plan will seek to pro-actively manage the future supply of Houses in Multiple Occupation (HMO's), flats or apartments and Purpose Built Managed Student Accommodation (PBMSA) to ensure that mixed and balanced communities continue to be delivered and maintained. Specifically, this approach will include:</p> <ul style="list-style-type: none"> <li>• General policy provisions to ensure that the established character of existing residential communities is protected;</li> <li>• Limiting the number of HMO's and flat conversions allowed in specific areas of the city that are experiencing problems associated with the over-proliferation of these intensive forms of housing;</li> <li>• Identify locations that are best able to support more intensive forms of housing; and</li> <li>• Introduce a new criteria based policy for the assessment of PBMSA applications.</li> </ul>	<p><b>HOU10: Housing Management Areas (HMA's)</b></p> <p>Within designated HMAs, planning permission will only be granted for Houses in Multiple Occupation (HMOs) and/or flats/apartments where the total number of HMOs and flats/apartments combined would not as a result exceed 20% of all dwelling units within an HMA.</p> <p>Outside of designated HMAs planning permission will only be granted for HMOs where the number of HMOs would not as a result exceed 10% of all dwelling units on that road or street. Where such a street is in excess of 600 metres in length, the 10% threshold will be calculated on the basis of existing residential units within 300 metres of either side of the proposal on that street.</p> <p>Proposals for conversion back to single dwelling units will be supported, subject to meeting all other policy requirements.</p> <p><b>HOU11: Intensive Housing Nodes</b></p> <p>Within designated intensive housing nodes, planning permission will be granted for HMOs and flats/apartments. This will be subject to meeting all other policy requirements.</p> <p><b>HOU12: Large scale purpose built managed student accommodation (PBMSA)</b></p> <p>Planning permission will be granted for large scale purpose built managed student accommodation (PBMSA) subject to a number of criteria.</p>	<p>Following the POP consultation on LP6, three policies were drafted – HOU10, HOU11 and HOU12. The overall direction of travel is the same, however there are some significant changes of note.</p> <ul style="list-style-type: none"> <li>• HOU10 – a key change in threshold proposed (now 20% for HMA's) as opposed to 30% in the Subject Plan. This change has taken account of the NIHE register of HMO's, which outlines much lower percentages of HMO's, potential flaws in the Subject Plan figures and taking account of sub-division approvals.</li> <li>• In regard to HOU12, the PAC report into the DoE's HMO Subject Plan 2008 noted <i>"The Department's evidence suggested that full time management would not be economic for complexes of less than 200 students. As Criterion 1 does not set a minimum occupancy level per unit, a fifty unit complex may not support the management staff required. It is therefore recommended that the minimum is based on the no of occupants rather than the number of units."</i> Reference to the number of units in the first iteration of HOU12 was removed from the draft policy and replaced by bed spaces.</li> </ul> <p>In addition, as PBMSA is sui generis, in the interests of sustainable development, criteria c) of HOU12 was retained, which relates to the quality residential environment, and referencing of the HMO space standards.</p>



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<p>Supplementary Planning Guidance may be used to ensure that the approach is flexible and can be tailored throughout the plan period in response to market conditions and emerging trends.</p>		
<p>N/A</p>	<p><b>HOU3: Protection of existing residential accommodation</b></p> <p>There is a general presumption in favour of the retention of residential stock for permanent occupation. Within an established residential area or fronting onto a city corridor outside of a designated centre, planning permission will be granted for the redevelopment and/or change of use of existing dwellings for other uses where:</p> <ol style="list-style-type: none"> <li>It is considered complimentary to surrounding residential uses and will not result in any adverse effects on existing residential amenity; or</li> <li>The proposal is for community infrastructure considered necessary within the residential area.</li> </ol> <p>In the case of the partial change of use of an existing dwelling, in addition to the above requirements the non-residential use should:</p> <ol style="list-style-type: none"> <li>Be subordinate to the residential use; and</li> <li>Provide a separate user entrance if public access is required.</li> </ol> <p>This will be subject to meeting all other policy requirements. The use of permanent residential stock as short-term holiday accommodation will be treated as a change of use and will also be subject to the requirements of policy HOU13.</p> <p><b>HOU13: Short-term let accommodation</b></p>	<ul style="list-style-type: none"> <li>At an elected member workshop in January 2018, a query was raised regarding the loss of residential stock and the control of short-term lets in Belfast. Two new policies were introduced (HOU3 and HOU13) following further research into planning responses elsewhere to short-term let accommodation, as well as internal legal advice.</li> <li>Given the significant growth target in HOU1, it is also necessary to protect existing housing stock in the city. Therefore policy HOU3 was drafted, aiming to protect residential stock from inappropriate development. Policy HOU13 acknowledges that short-term let accommodation, which has risen at a rate of 95% year on year in Belfast, is a critical issue in relation to protecting stock for permanent residential use.</li> <li>Policy HOU3 seeks to prohibit inappropriate non-residential uses within established residential areas and areas where higher density residential accommodation is appropriate, such as highly accessible locations fronting onto city corridors. This is important in the context of delivering sustainable residential development in the city.</li> </ul>



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	<p>Planning permission will be granted for short-term let accommodation, whether new build or change of use, subject to criteria, including strengthening and diversifying the range of short-stay visitor accommodation in the city, accessibility by public transport, sited within an existing tourism cluster or close to a visitor attraction, having appropriate management arrangements in place etc.</p> <p>Where all other policy requirements, such as those relating to design quality, residential density, affordable housing, transport provision and open space provision, are not met, conditions will be applied to limit occupation to short-term lets only. If appropriate, management arrangements may be secured using s76 planning agreements.</p>	<ul style="list-style-type: none"> <li>• Policy HOU3 does allow for necessary community infrastructure. Such facilities located within established residential areas can contribute towards sustainable communities when appropriate in scale and accessible etc.</li> </ul>
<p><b>LP7: Quality design in residential developments preferred option</b></p> <p>Our preferred option is to set out a single criteria based policy to ensure quality in all residential development. This will ensure that future housing developments respect the surrounding context and are appropriate to the character and topography of their specific site in terms of layout, scale, proportions, massing and appearance of buildings, structures and landscaped and hard surfaced areas. The policy provisions should also ensure there is no unacceptable adverse effect on existing or proposed properties in</p>	<p><b>RD1: New residential developments</b></p> <p>Planning permission will be granted for new residential development where it is in accordance with general urban design policies and subject to a number of criteria, including :</p> <p>not creating conflict with adjacent land uses, remaining in conformity with the character of any established residential areas, not unduly affecting privacy or amenity, making provision for, or accessible to public transport and walking and cycling infrastructure, providing appropriate open space etc.</p> <p>Policy also states that for new-build apartment developments over 30 units, in addition to the above criteria, planning permission will be granted subject a number of criteria, including:</p> <p>management arrangements in place, entrance lobby's and communal spaces are appropriate in scale,</p>	<ul style="list-style-type: none"> <li>• While LP7 referred to a single, criteria based policy to ensure quality in all residential development, three draft policies were initially created – <i>New residential developments</i>, <i>Quality design in large-scale apartment developments</i> and <i>Conversion or sub-division of existing buildings for residential use</i>.</li> <li>• A further policy was included on residential extensions following query as to whether the residential design policy (HOU12) covered extensions / alterations.</li> <li>• During consultation, the need for a separate policy on large-scale apartment development was queried. It was agreed that there was a synergy with wider residential design policies and therefore the large-scale apartment policy was amalgamated with the general residential</li> </ul>

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<p>terms of overlooking, loss of light, overshadowing, noise or other disturbance.</p> <p>This overarching policy approach will complement the general approach to good design addressed under the design and heritage aspect of the Council's Preferred Options Paper, but will introduce a number of criteria and related guidance specific to housing development, such as:</p> <ul style="list-style-type: none"> <li>• Introduction of minimum housing space standards to ensure that dwellings meet the needs of residents;</li> <li>• Adequate provision of public and private open space, including minimum garden size standards;</li> <li>• Ensure that developments contribute to the sense of place, and maximise opportunities for the creation of local landmarks and the use of public art;</li> <li>• convenient access to public transport; and</li> <li>• Ensuring that the design and layout will not create conflict with adjacent land uses etc.</li> </ul>	<p>designated internal storage space, adequate storage and disposal of waste etc.</p> <p>S76 planning agreements may be required to secure management arrangements where these cannot be adequately addressed by the imposition of conditions alone.</p> <p><b>RD2: Residential extensions and alterations</b></p> <p>Planning permission will be granted for extensions or alterations to an existing residential property where the scale, massing, design and external materials of the proposal are appropriate to the built form and appearance of the existing property and will not detract from the character of an established residential area. This includes support for measures that enable people to stay within their own homes, such as physical adaptations and energy efficiency enhancements. Planning permission will be subject to proposals meeting all other policy requirements.</p> <p><b>RD3: Conversion or sub-division of existing buildings for residential use</b></p> <p>Planning permission will be granted for conversion or change of use of existing buildings for residential use where all the criteria in policy RD1 and all the additional criteria below are met:</p> <p>Any units are self-contained, adequate refuse storage space, original property is greater than 150 square metres gross internal floorspace in the case of sub-division of an existing dwelling; and conversions above commercial premises do not prejudice the commercial functions below.</p> <p>Planning permission will be subject to proposals meeting all other policy requirements.</p>	<p>design policy. This left a total of <u>three</u> residential design policies – (initially HOU13-15) – RD1, RD2 and RD3 (refer middle column).</p> <p>Policy RD3 was amended to add additional criteria from PPS7 Addendum policy LC2 to state that <i>'the original property is greater than 150 square metres gross internal floor space in the case of sub-division of an existing dwelling'</i>. Rationale being that whilst the policy allows for the sub-division of existing dwellings into flats, it seeks to prevent this where existing dwellings are too small to deliver smaller units without negative impacts on existing residential amenity.</p>

Preferred Option (POP)	Draft Plan Strategy Policy (DPS)	Key changes made / actions taken through SA Process
<p>This policy approach will be applied to extensions and alterations to existing dwellings, and conversions of other buildings to residential use, as well as to all new build residential developments.</p>		
<p><b>LP11 – Urban design</b> Applications will be required to demonstrate how their design supports the creation of an attractive environment in Belfast.</p>	<p><b>DES1 – Principles of urban design</b> This policy requires all development to be of high quality, sustainable design that makes a positive contribution to placemaking.</p>	<ul style="list-style-type: none"> <li>• Further analysis of urban design policies across the UK alongside peer reviews highlighted potential duplications of criteria within the urban design policies. It was therefore considered appropriate to merge policies into one overarching principles of urban design policy so as to avoid repetition within the DPS. The policy now encompasses LP11, LP12, LP13, LP16 and LP17.</li> <li>• Supplementary Planning Guidance will follow the publication of the DPS to provide more in-depth design guidance on specific issues.</li> </ul>
<p><b>LP14 – Tall buildings</b> Include a policy on taller buildings. This will allow the plan to adopt an approach which identifies sites where taller buildings may be acceptable in certain locations.</p>	<p><b>DES3 - Tall Buildings</b> This policy will support applications for tall buildings, defined as any building 35m or taller or those which are significantly higher than their surroundings, where they can demonstrate compliance with the criteria outlined.</p>	<ul style="list-style-type: none"> <li>• Further analysis of existing heights within the city has been undertaken in order to establish a threshold that triggers the policy criteria contained in DES3.</li> <li>• The criteria builds upon that highlighted within the POP with further detail added to the policy.</li> <li>• Local Policies will potentially identify sites where taller buildings may be acceptable.</li> </ul>
<p>N/A</p>	<p><b>DES2 - Masterplanning approach for major applications</b> The Council will grant planning permission for new major development where it accords with the outlined masterplanning principles.</p>	<ul style="list-style-type: none"> <li>• As result of merging policies within one overarching policy it was considered at this stage that a standalone policy for major applications would be beneficial for the draft plan strategy as many applications that meet this threshold have a significant strategic impact on the city.</li> </ul>

Preferred Option (POP)	Draft Plan Strategy Policy (DPS)	Key changes made / actions taken through SA Process
<p>POP policy criteria within the SPPS considered sufficient at the time of POP publication.</p>	<p><b>DES4 – Advertising and signage</b>  This policy will set criteria for advertising and signage throughout the city to include built heritage areas.</p>	<ul style="list-style-type: none"> <li>• This policy is in line with the objectives of the SPPS and adds additional criteria with regards to the standards of design required for advertising within Belfast and more specifically the impact on the city’s built heritage assets.</li> <li>• Supplementary Planning Guidance will follow the publication of the DPS to provide more in-depth design guidance on specific issues.</li> </ul>
<p><b>LP15 Archaeology and built heritage</b>  The plan will identify the heritage assets of the city and include additional policy criteria to address specific issues and demand pressures affecting the heritage assets of the plan area as a supplement to the SPPS.</p>	<p><b>BH1 – Listed buildings</b>  <b>BH2 – Conservation areas</b>  <b>BH3 – Areas of townscape character</b>  <b>BH4 – works affecting grounds of built heritage assets</b>  <b>BH5 – Archaeology</b>  <b>BH6 – Historic parks and demesne</b></p> <p>Within the draft plan strategy policies for built heritage have been divided to represent each built heritage designation or area of importance. This was considered to be appropriate as each asset has different levels of statutory protection and therefore policy criteria would differ.</p>	<ul style="list-style-type: none"> <li>• The policies have adopted the criteria as set out in PPS6 and the Addendum to PPS6 following feedback from Historic Environment Division (HED). These policies build upon the criteria set out within the SPPS and are in line with the main objective to protect and enhance Belfast’s unique heritage qualities.</li> <li>• One area removed from the policies is advertising within built heritage areas. This will now be covered by DES4 advertisements and signage as the policy criteria was considered repetitive.</li> <li>• Policy BH4 provides additional criteria for ancillary works as a result of ongoing development pressures affecting the character of designated areas.</li> </ul>

Preferred Option (POP)	Draft Plan Strategy Policy (DPS)	Key changes made / actions taken through SA Process
<b>CREATING A VIBRANT ECONOMY</b>		
<p><b>VE 3- Existing employment land</b> Protect exiting employment against other competing uses. There will be a presumption in favour of retaining employment focus of existing employment land. Whilst at the same time allowing flexibility for alternative uses</p>	<p><b>EC 4- loss of zoned employment land</b> is included in the Draft LDP to support the protection of zoned employment land.</p>	<p>The policy approach was adopted after the Urban Capacity Study demonstrated that there was a substantial oversupply of employment land. Protection of un-zoned land used or last used for employment purposes was removed from the policy in the light of this.</p>
<p><b>VE 11- City centre living-</b> Promote increased densities, re-use of existing buildings and a mix of houses types and tenures</p>	<p>Subsumed by policies – <b>HOU2, HOU4, HOU 6 and CC1</b></p>	<p>The main policy direction and tests for city centre living are covered under other proposed housing policies and the economy sections' development opportunity sites policy. Therefore it was decided there was no need to take forward a policy on City Centre living.</p>
<p><b>Not Applicable</b></p>	<p>Draft policy on hot food takeaways removed</p>	<p>It was decided that the existing policy has been sufficient in considering proposals for hot food takeaways. It was also concluded that the policy whilst popular would not be practical</p>
<p><b>Not applicable</b></p>	<p><b>RET 4- Retailing warehousing</b> This policy sets criteria that must met for further retail development in areas of retail warehousing</p>	<p>This policy came forward following evidence gathering for the retail and leisure capacity study. It was concluded that these areas needed managed to limited trade draw away from the existing network of centres.</p>
<p><b>VE 12- Shared Space in the City Centre.</b> The plan will promote the principles of a shared society through guidance and a spatial approach</p>	<p><b>Policy SP4- Community cohesion and good relations</b> The council will support development that maximises opportunities to build strong, cohesive communities and that makes a positive contribution to good relations</p>	<p>Given the importance of shared space this policy was elevated and subsumed into an overarching strategic policy for the entire city.</p>

Preferred Option (POP)	Draft Plan Strategy Policy (DPS)	Key changes made / actions taken through SA Process
<b>BUILDING A SMART, CONNECTED, RESILIENT PLACE</b>		
<p>In the POP response Dfl stated that transport issues should be reflected more thoroughly and consistently throughout the draft plan in line with PPS 13 and the SPPS, in particular the need to secure improved integration between land-use planning and transportation.</p>	<p>Further emphasis has been given to the integration of transport and land use planning in the draft plan strategy and is reflected in the approach outlined in Strategic Policy 7.</p>	<p>The approach is line with national policy and supports the SA economic objective to promote an integrated transport system and encourage sustainable travel.</p>
	<p>The SPPS give clear direction in relation to encouraging active travel and sustainable travel and this approach is reflected in the draft plan strategy. A large number of policies in the draft plan strategy have been transferred from the planning policy statement documents in particular relating to telecommunications, waste, renewable energy, minerals and transport.</p>	
<b>PROMOTING A GREEN AND ACTIVE PLACE</b>		
<p>LP 8 Promotion Health and Wellbeing ...to include strategic policies to ensure that all new developments maximise opportunities to promote healthy and active lifestyles. This will include supporting active travel options, improving accessibility to local service centres, adequate provision of public open space, leisure and recreation facilities and managing the provision of restaurants, cafes and hot food bars.'</p>	<p><b>SP3 Improving Health and Wellbeing</b> This overarching policy is included in the Draft LDP to support development that maximises opportunities to improve health and wellbeing and to resist development that will result in significant harm to health and wellbeing.</p>	<p>This policy approach is In line with national policy and the preferred option, but greater emphasis on it is placed with the creation of the overarching strategic policy, which is also transposed in more detail in draft <b>policy HC1 Promoting Healthy Communities</b> and also influences other policies, including those relating to SA environmental objectives – such as open space and green &amp; blue infrastructure. This takes account of the POP public consultation, when a frequent issue raised related to the clear linkages between access to open space and health and wellbeing.</p>

Preferred Option (POP)	Draft Plan Strategy Policy (DPS)	Key changes made / actions taken through SA Process
		The Healthy eating policy Removed – Economic side of the house needs to respond ie downgraded to a SPG?
<p><b>SCR 12</b>  ...to focus on the management of potential flood risk in the urban area. This will consider the potential for supplementary guidance on how to incorporate flood mitigation measures, such as SuDs appropriate for the urban environment</p>	<p><b>ENV5 Sustainable Drainage Systems</b>  This policy requires all built development to consider inclusion of SuDS measures.</p>	<p>Whilst in line with the POP approach, and following significant support for the approach, the policy has been drafted to apply as widely as possible, reflecting the potential for built developments of all scales to incorporate some SuDS measures. This is also incorporated into the green &amp; blue infrastructure and masterplanning policy to greater emphasise its importance.</p>
<p><b>GA1</b>  ...to support an integrated approach to green and blue infrastructure networks.</p>	<p><b>SP8 G&amp;B Infrastructure</b>  This overarching policy is included in the Draft LDP to support the development of a blue and green infrastructure network across the plan area.</p>	<p>This policy approach is In line with national policy and the preferred option, but greater emphasis on it is placed with the creation of the overarching strategic policy, which is also transposed in more detail in draft policy GB1 and also influences other policies, including those relating to SA environmental objectives – such as open space, biodiversity and environmental change.</p> <p>This policy approach was adopted following the POP public consultation, when a frequent issue raised related to the clear linkages between access to open space and health and wellbeing.</p>





## Belfast Planning Service

Belfast City Council  
Cecil Ward Building  
4-10 Linenhall Street  
Belfast BT2 8BP

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

 [planning@belfastcity.gov.uk](mailto:planning@belfastcity.gov.uk)

 028 9050 0510

 @belfastoc

 @belfastcitycouncil

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