



# Belfast

## Local Development Plan

### Sustainability Appraisal Report May 2023

Sustainability Appraisal of the Plan Strategy 2035  
Incorporating Strategic Environmental Assessment

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



**Belfast**  
City Council





# **Belfast Local Development Plan 2035**

## **Sustainability Appraisal Report, May 2023**

for the **Plan Strategy**, incorporating  
Strategic Environmental Assessment

This Sustainability Appraisal Report comprises the following documents:

- Sustainability Appraisal Non-Technical Summary, August 2018
- Sustainability Appraisal Report, August 2018
- Sustainability Appraisal Addendum, May 2022
- Second Sustainability Appraisal Addendum, April 2023



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# Belfast Local Development Plan

**Non-technical Summary** August 2018

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

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



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## 1. Sustainability Appraisal

- 1.1 Sustainability Appraisal (SA) is a statutory process incorporating the requirements of the EU Strategic Environmental Assessment Directive and is being carried out alongside development of the **Belfast Local Development Plan**.
- 1.2 It is a systematic process for appraising the plan against a set of sustainability objectives to identify the relative social, economic and environmental performance of possible strategic, policy and site options, and to evaluate which of these may be more sustainable.
- 1.3 The SA allows us to show how we have assessed reasonable alternatives and any likely significant effects they may have if the plan is implemented. It clarifies how these have been taken into account in the decision-making process, and highlights any changes to policies, proposals and mitigation measures that have been made as a result of the SA.

## 2. The Belfast Local Development Plan

- 2.1 The Local Development Plan (LDP) will provide a planning strategy for the council area and will be fundamental in the council's efforts to deliver sustainable development that reflects the vision and aspiration of local communities.
- 2.2 The primary purpose and scope of the plan is to:
- ▶ Establish the strategic spatial strategy,
  - ▶ Allocate sites to meet the city's development needs between 2020 and 2035; and
  - ▶ Set development management policies against which individual proposals can be assessed.
- 2.3 The **Draft Plan Strategy** is the first of two formal documents that make up the LDP, which sets out the strategic policy framework for the plan area across a range of topics. Following its adoption, we will prepare, publish and adopt the **Local Policies Plan**.

### 3. The Sustainability Appraisal Report

- 3.1 The purpose of this Sustainability Appraisal Report is to present an integrated Sustainability Appraisal (SA), incorporating a Strategic Environmental Assessment (SEA), of the Draft Plan Strategy. Where reference is made to SA throughout the report, it denotes SA incorporating the SEA requirements.
- 3.2 The key aims and principles of SA are to:
- ▶ Make the LDP more sustainable and responsive to its social, economic and environmental effects,
  - ▶ Identify key issues, significant impacts and ways to minimise any negative effects,
  - ▶ Eliminate or 'scope out' insignificant effects,
  - ▶ Influence alternatives and mitigation measures,
  - ▶ Provide an early and effective opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process; and
  - ▶ Document the story of the LDP preparation.

3.3 The SA Report contains:

- ▶ An outline of the contents and main objectives of the LDP and its relationship with other plans, programmes and strategies,
- ▶ The current state of the environment and key sustainability issues for the plan area,
- ▶ The SA Framework against which the Draft Plan Strategy has been appraised,
- ▶ An appraisal of options and reasonable alternatives,
- ▶ An explanation of the likely significant effects of the Draft Plan Strategy,
- ▶ The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects which may arise as a result of the plan,
- ▶ A description of the measures envisaged for monitoring; and
- ▶ The next steps for the SA.

3.4 **Figure 1** on the next page shows the stages of the LDP and where the sustainability appraisal is carried out.

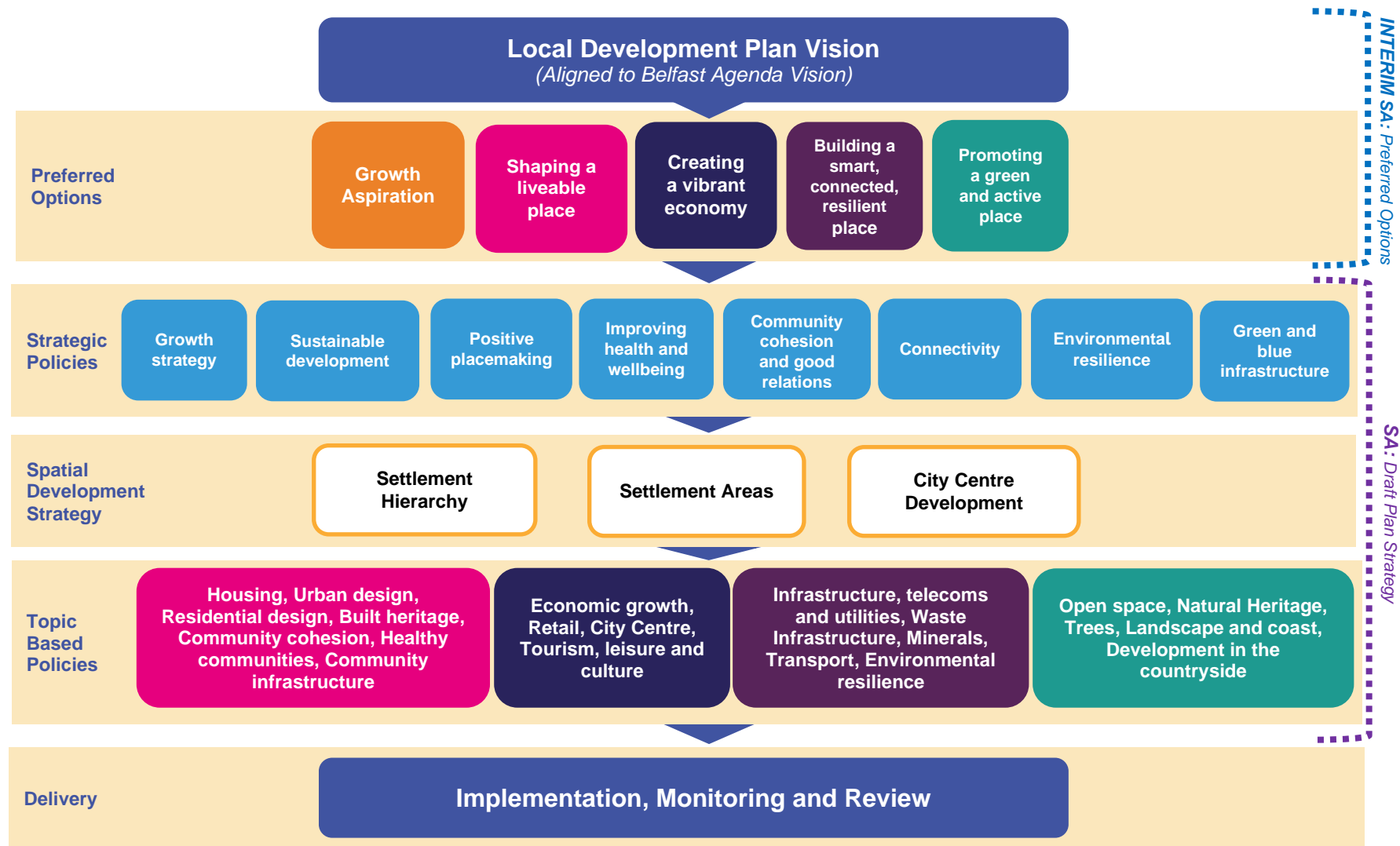


Figure 1: Appraisal Stages of the Draft Plan Strategy

## 4. Scoping

4.1 The SA **Scoping Report** was prepared and submitted for consultation in November 2016. This set out the intended scope and level of detail to be included in the SA Report and focussed on the key issues that the LDP should address or potentially affect by:

- ▶ Review of relevant policies, plans and programmes (PPP),
- ▶ Presenting current baseline information; Identifying sustainability objectives, opportunities and challenges,
- ▶ Assessing the likely evolution of existing conditions without the LDP; and
- ▶ Establishing a SA Framework of objectives against which the LDP could be appraised.

4.2 Following the consultation process, the Scoping Report was updated to take account of the responses received,

and as we move through the plan-making process it will be updated at each relevant stage.

4.3 **Table 1** presents a high-level summary of the PPP review. This focusses on some of the key examples at each level; what those documents say that the LDP should or must do; and how the review has directly influenced both the LDP and SA. A full detailed list of all PPPs relevant to the Belfast LDP is presented as an appendix to the main SA Report.

4.4 **Table 2** presents a summary of the key sustainability issues identified from the baseline information, together with the likely evolution of each issue in the absence of the LDP.

4.5 **Table 3** identifies the 19 SA objectives that make up the SA Framework and clarifies from which theme and SEA topic they have originated.



Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
<b>INTERNATIONAL &amp; EUROPEAN LEVEL</b>		
SEA Directive	Provide for high level of environmental protection and integrate environmental considerations into the preparation and adoption of LDP with a view of promoting sustainable development.	The SEA Directive must be applied to the preparation of the LDP. Specific requirements of the Directive must also be met through the SA.
Habitats Directive	Promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements; conservation of natural habitats; and maintain landscape features of importance of wildlife and fauna.	The LDP should take account of the Habitats Directive. Specific SA objectives should be included to protect and maintain the natural environment and important habitats.
Europe 2020 Strategy	The European Union's 10-year jobs and growth strategy; launched in 2010 to create the conditions for smart, sustainable and inclusive growth. Includes 5 headline targets for the EU to achieve by 2020.	The council should take account of the 5 headline targets when preparing the LDP.
<b>NATIONAL LEVEL</b>		
The Planning Act (Northern Ireland) 2011	Formulation and co-ordination of policy securing the orderly and consistent development of land, and the planning of the development.	The LDP must adhere to the legislation set out by the Planning Act.
Regional Development Strategy 2035 (RDS)	Aims to take account of the economic ambitions and needs of the region, and put in place spatial planning, transport and housing priorities that will support and meet the aspirations of the region.	The LDP should take into consideration and reflect the relevant policies contained within the RDS.
Strategic Planning Policy Statement (SPPS)	Sets out the Department's regional planning policies for securing the orderly and consistent development of land.	The provisions and core principles of the SPPS must be taken into account and reflected in the preparation of the LDP.

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
N.I. Sustainability Development Strategy	Framework to respond to major threats such as climate change and energy price instability, encouraging integrated action to tackle problems and take advantage of opportunities.	The LDP should take the strategy into consideration by promoting sustainable development whilst identifying and addressing issues and maximising opportunity.
<b>LOCAL LEVEL</b>		
Belfast Metropolitan Area Plan 2015	Although formally adopted in 2014, this process of final BMAP adoption was declared unlawful as a result of a judgement in the court of appeal delivered on 18 May 2017. This means the Belfast Urban Area Plan (BUAP) 2001 and the other Development Plans provides the statutory plan context for the area. However, BUAP was published in 1990, nearly 30 years ago. The Belfast City Council Plan Area has undergone massive transformation since then, particularly in the city centre. The formal development plans which apply are dated and silent on many of the planning issues pertinent to needs of current planning decision making. In recognition of this unique circumstance and taking account of the short-term transitional period in advance of the adoption of the Local Policies Plan it is important to provide clarity in relation to the application of planning policy.	Draft BMAP, in its most recent, post-examination form remains a significant material consideration in future planning decisions. It was at the most advanced stage possible prior to formal adoption. Draft BMAP referred to throughout this document therefore refers to that version. However, in preparing this document the council has also had regard to the provisions of the draft BMAP which was published in 2004, the objections which were raised as part of that plan process and the Planning Appeals Commission Inquiry report.
Belfast Agenda	The community plan for Belfast, created in partnership with key city partners, residents and community organisations. The plan sets out medium and long-term goals for social, economic and environmental improvements for Belfast over the next 15 years.	The LDP should provide the spatial reflection of the Community Plan and establish a coherent, joint vision for Belfast that will shape development and growth of the city over the next 15 years. The LDP preparation must therefore take full account of the Community Plan. This is explained below in more detail.

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
Belfast City Centre Regeneration Investment Strategy	Strategy to ensure maximum economic and social impact.	The LDP should promote the underlying and core principles of the strategy.
Belfast Integrated Tourism Strategy	Aims to achieve the ambition and aspiration to make Belfast a world class, must-visit, city destination.	The LDP should promote Belfast as a tourist destination through its strategies and policies.
Belfast Integrated Economic Strategy	Sets out the key strategic aspirations and priorities for Belfast City Council, Invest NI and its partners.	The LDP should enable economic growth and prosperity of the city council area through its strategies and policies.

**Table 1: High Level Plan, Policy & Programme Review**

Themes	Key Sustainability Issues	Likely Evolution without the LDP
<p><b>Population &amp; Human Health</b></p>	<p>Approx. 45% of Belfast’s population live in deprived areas, with life expectancy lower than the N.I. average. Health inequalities are evident, with high deaths rates due to obesity. Segregation via peace walls heavily restricts expansion and connectivity.</p>	<p>The Belfast Agenda identifies health as a priority and could potentially coordinate programmes to address these inequalities, whilst the Department of Communities ‘Neighbourhood Renewal’ scheme will continue to address deprivation and local issues. Likewise regional and local programmes may seek to address health disparities across the city, however without the LDP and supporting evidence, current trends could continue to worsen, and it would not be possible for the council to fully understand and plan positively for the city’s spatial and development needs. In terms of segregation the NI Executive set ambitious targets to reduce and remove all interface barriers by 2023. Without the LDP, an updated evidence base and supporting policy would be absent to assist the removal of barriers to create shared spaces and maximise accessibility of all areas within communities. There would also be a potential lack of collaborated approaches to integrate regeneration of wider neighbourhood environments, and sustainable modes of transport within land use development.</p>
<p><b>Housing</b></p>	<p>There is a shortage of social housing schemes to meet demand. Accommodating growth requires suitable and affordable house types, in the right locations, to meet differing needs.</p>	<p>Without an up-to-date housing policy to accommodate local growth, it may not be possible to meet demand for identified annual housing supply, or satisfy local requirements for housing type, including affordable housing. The location of suitable housing lands may not correlate to clear areas of housing stress, whilst there would be no mechanism to address the demands of population need, including an aging population, to ensure people have the opportunity to live in houses that address particular need.</p>
<p><b>Crime</b></p>	<p>A third of N.I. recorded crime offences in 2014 occurred in Belfast, with higher anti-social behaviour in Belfast than any other council area.</p>	<p>Existing policies and community safety initiatives from other statutory providers will continue to provide interventions to reduce crime. SPPS also provides guidance in supporting good design and positive placemaking. However, without spatial, strategic direction through the LDP, current trends could continue or worsen.</p>

Themes	Key Sustainability Issues	Likely Evolution without the LDP
<b>Open Space</b>	There is a disparity in the provision of open space across Belfast, with low levels of open and green space in the city centre.	SPPS and PPS8 would still prevail in terms of open space protection, however SPPS requires an Open Space Strategy to be undertaken specifically through the LDP. Without this the uneven distribution of open space may not be adequately addressed, with a significant lack of city centre open space and various other areas throughout the city lacking in accessible, open space.
<b>Education</b>	The 2011 census outlined that 41% of the adult population have no formal qualifications which decreases chances of employability.	Other statutory providers will continue to invest in employability and skills of the population through interventions such as the Council's Skills and Employability Framework. However, without the LDP there may be insufficient economic and employment land to provide locations for entrepreneurs or attract inward investment to establish Belfast as the regional economic driver.
<b>Employment</b>	30% of Belfast's working age population are economically inactive who are not looking or available for work. Half of these claim benefits.	Absence of the LDP could further disadvantage those on lower incomes in terms of access to places of work and local amenities. The LDP could also improve community connections to places of work, and zone suitable land for economic development and regeneration based on the local needs of the area.
<b>Tourism</b>	Whilst Belfast has a growing tourism economy, a number of weaknesses could inhibit and hamper economic growth– limited hotel bed space; lower than average overnight trip length and spend per night; and connectivity weaknesses between key points of interest.	Without the LDP the council would be unable to facilitate sustainable tourism growth to adequately reflect Belfast's unique needs and assets, such as opportunities to exploit the international trend towards city and business tourism; the city's capacity to become a cultural tourism destination; and expansion of water-based tourism along the Lagan and canals.
<b>Transportation</b>	Regional dependency and reliance on private car travel have resulted in road traffic congestion, which has adversely impacted air quality, CO2 emissions and environmental quality. There is a clear need to integrate transportation and land use to maximise development around a quality sustainable transport network.	Regional policy such as PPS13 may address this issue to some extent, however the implementation of specific, up-to-date public transport policies would provide more certainty in relation to addressing public transport issues locally. Furthermore, the Belfast Metropolitan Transport Plan is currently being reviewed, and without the LDP it would be harder to implement transport strategies in an integrated way.

Themes	Key Sustainability Issues	Likely Evolution without the LDP
<b>Retail</b>	There are high levels of vacancy rates in Belfast which reduces the retail offer and economic potential of the city centre.	The SPPS and RDS identify the need to enhance the distinctive role of the city centre as the primary retail location in NI, and regional objectives set a town centre first approach to new retail. Without the LDP there could be a reliance of market led development which can take people out of the town centre, whilst high vacancy levels in the city centre would continue which would be detrimental to vitality and viability. The LDP would also provide an integrated framework for regeneration and development, in particular supporting investment through the Belfast City Centre Regeneration Investment Strategy.
<b>Biodiversity, Flora &amp; Fauna</b>	Belfast has many designated sites protected for their biodiversity and conservation importance. New development, pollution and disturbance could pose a threat to vulnerable biodiversity sites resulting in habitat loss and fragmentation.	This issue is being addressed to some extent as SPPS and PPS provide some protection, such as PPS2 Natural Heritage, whilst dBMAP 2015 provides local designations policy. Likewise, the Belfast Local Biodiversity Action Plan 2007 (LBAP) sets local priorities for action on habitats and species. However, without the LDP sites of nature conservation would be at considerable risk given the current pressures for growth and development within the district. An up-to-date LDP would map and define sites requiring protection from obtrusive development, along with guidance on siting, scale and nature of development. This would help to conserve and enhance biodiversity and geodiversity by directing development away from sensitive locations and managing new development so that its design minimises effects on the natural environment and helps to create and connect habitats.
<b>Air Quality</b>	The heavy reliance on vehicular travel leads to road traffic congestion which is having an adverse effect on air quality and CO2 emissions in Belfast.	Existing legislation in SPPS and PPSs seek to manage air quality to acceptable thresholds through Environmental Impact Assessment screening. However, without action from the LDP to direct development to sustainable locations and increase provision of sustainable transport infrastructure, the trend for increasing car ownership and travel is likely to continue with associated emissions of air pollutants likely to increase.

Themes	Key Sustainability Issues	Likely Evolution without the LDP
<b>Water</b>	All water bodies within the River Lagan, tidal Lagan and inner Belfast Lough are currently failing to meet their Water Framework Directive (WFD) objectives, which is being addressed through the Living with Water Programme (LWWP) and the North-East River Basin Management Plan (NE RBMP). However, without major investment in wastewater and sewage infrastructure in Greater Belfast, it may not be possible to permit new connections that will impact significantly on an already stretched infrastructure and adversely affect the economic growth strategy for Belfast.	The LWWP would still go ahead without the LDP, but development would potentially be ad-hoc and piecemeal, as it would be difficult to coordinate development and its supporting infrastructure. Utility providers may find it difficult to plan for growth and expansion in their networks, the knock-on effects of which could result in delays and inability to adequately address water quality, which could contravene the WFD requirements.
<b>Contaminated Soils</b>	Belfast has significant areas of previously developed or brownfield land, with many remaining undeveloped or vacant for extended periods. This highlights the concerns over potential viability for housing, which could hinder the LDP's growth aspirations.	The council and NIEA would continue to regulate the Waste and Contaminated Land (Northern Ireland) Order 1997 as much as possible, and to assess and manage land contamination through the provisions of government guidance Contaminated Land Report 11 (Model Procedures for the Management of Land Contamination).
<b>Cultural &amp; Built Heritage</b>	Belfast has a rich cultural and built heritage, which could potentially come under pressure from new development. Alongside this, some of Belfast's heritage assets are in neglect and decay.	SPPS provides protection at a regional level, alongside PPS6 and the Addendum to PPS6. However, without the LDP to coordinate protection and enhancement at a local level, sites that have not been formally designated will have limited protection and could be at risk of inappropriate development. Historic character and townscape would be at risk of erosion, and it may be difficult to protect or offer enhancements to assets on the Heritage at Risk Register. The number of sites on the register would also likely increase.

Themes	Key Sustainability Issues	Likely Evolution without the LDP
<b>Landscape</b>	The city's landscape is subject to limited statutory landscape character and countryside designations, which are under increasing pressure from development and the intrusion of urbanising elements.	SPPS provides some protection and is supported by PPS2 and PPS21. Without the LDP however, local sites unique to Belfast may have limited protection, such as Geodiversity sites.
<b>Waste</b>	Challenges in managing and accounting for all waste stream means the council may not achieve regional landfill obligations, with increasing pressure to deliver recycling targets set by the N.I. Executive and Europe.	European and Regional targets are set to incrementally reduce waste and encourage recycling in the city, therefore the LDP may not have much impact. The council will still explore opportunities for further waste reduction and innovative solutions.
<b>Climate Change</b>	Belfast still relies on fossil fuels which contribute to rising greenhouse gas emissions and poor air quality. These are increasing global temperatures, giving rise to more intense rainfalls and sea levels, consequently leading to a significant threat of flooding.	The NI Climate Change Adaptation Programme will continue to provide strategic objectives on climate change and adaption. The Climate Change Risk Assessment will continue as the statutory requirement of the UK Climate Change Act, published every 5 years, whilst cross departmental action is reviewed on an annual basis to ensure greenhouse gas reduction targets are met via the Cross Departmental Working Group on Climate Change. Nonetheless, without the LPD the current and projected flood risk trend is likely to continue, the impact magnitude and extent of which may also increase. Positive management is required, with a local response to sequentially allocate sites for development avoiding the highest risk areas as a first principle.
<b>Renewable Energy</b>	The lack of renewable energy interventions could pose a risk to energy security in Belfast and make us less competitive in the global market.	The existing PPS18 was a reactive policy formulated in 2009 that requires minor changes in relation to renewable energy generation and promotion. However, targets for renewable energy consumption are outlined in the draft Programme for Government (40% of energy from renewable source and 10% heat from renewable source) and without the LDP, a strategic framework to deliver these would be absent through the planning system.

**Table 2 Key Current Sustainability Issues**



Theme	SEA Topic	SA Objective
SOCIAL	Population	1. Reduce deprivation & encourage an inclusive & equal society
	Population Human Health	2. Improve health & wellbeing for an improved quality of life
	Population	3. To provide opportunity for good quality housing & enable people to meet their housing needs
	Population	4. Increase community safety by supporting the reduction of crime & antisocial behaviour
	Population	5. To improve skills & education of residents through providing high quality, accessible lifelong learning opportunities
	Population	6. Retain & enhance access to local services & facilities
ECONOMIC	Population	7. To ensure local residents have access to employment opportunities
	Population	8. Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver
	Population Air Climatic Factors	9. Promote an integrated transport system & encourage sustainable travel
ENVIRONMENTAL	Biodiversity Flora Fauna	10. Maintain & enhance biodiversity assets & protect habitats & species
	Soil	11. Protect & enhance soil quality
	Cultural Heritage (including architectural & archaeological) Material Assets	12. Protect, conserve & enhance the historic environment, heritage assets & their settings

Theme	SEA Topic	SA Objective
	Landscape	13. Protect, maintain & enhance the quality of Belfast's distinctive landscape & geodiversity
	Landscape	14. Protect & enhance open space & natural greenspace including Belfast's countryside asset
	Material Assets	15. Promote the sustainable management of waste
	Water Material Assets	16. Promote the quality, efficient use of water resources
	Air	17. Reduce air pollution & ensure continued improvements to air quality
	Climatic Factors	18. Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy
	Climatic Factors	19. Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk

**Table 3: Sustainability Framework**

## 5. Appraisal of Preferred Options Paper

- 5.1 Following the scoping stage, the council undertook an assessment of strategic options and alternatives for the LPD. These were presented in the **Preferred Options Paper** (POP) and appraised through the **Interim SA Report**.
- 5.2 A total of 98 options and alternatives were identified by closely considering the key sustainability issues, the PPP review and baseline data for Belfast; in an effort to identify how best we can deliver and achieve the LDP objectives.
- 5.3 The appraisal was carried out by scoring each option and reasonable alternative against the objectives in the SA framework, using the colour coding shown below:

--	-	?	+/-	0	+	++
Significant Negative	Minor Negative	Unknown Effect	Mixed Effects	No Effect or Relationship	Minor Positive	Significant Positive

Figure 2: Assessment Scoring – Symbols & Colour Coding

- 5.4 Scoring is relative to the scale of proposals under consideration and is determined by the significance of the effect. The detailed methodology of assessment scoring and effect significance is explained in the methodology section of the main SA Report
- 5.5 To begin with, the LPD vision and objectives were appraised to ensure sound compatibility with the SA Framework.
- 5.6 Following this the 98 options were appraised against the framework to understand the likely social, economic and environmental effects. A number of alternatives were scoped out or rejected at an early stage where they were not considered to be a 'reasonable' alternative.
- 5.7 Of the 98 options appraised, a total of 48 were taken forward as preferred options. The following boxes present a brief summary of the key findings we identified through the appraisal.

### Supporting Economic Growth

Primarily positive effects noted under social and economic objectives; with mixed, neutral, unknown and minor negatives under the environmental objectives. This reinforces the need to ensure an appropriate balance between economic growth and safeguarding the environment as advocated in the SPPS.

### Shaping a Liveable Place

Significant percentage of neutral effects; the majority of which fall within the environmental objectives, with the highest proportion within SA Objective 11 'Protect & Enhance Soil Quality'. Notable positive scoring recorded under 'Community Cohesion' and 'New Homes' options, tying in with the high level aims of the RDS 2035.

### Creating a Vibrant Economy

Mixed positive and negative effects recorded, showing primarily positive effects under social and economic objectives; against mixed, neutral, unknown and minor negatives under the environmental objectives. This again reinforces the need to ensure appropriate balance between economic growth and safeguarding the environment as per SPPS.

### Building a Smart, Connected, Resilient Place

In contrast, with the exception of a small number of unknowns, positive effects were generally noted across the Environmental Objectives, with a higher proportion of Social and Economic Objectives returning neutral effects.

### Promoting a Green & Active Place

Notable positive scoring recorded, with no negatives, unknowns or mixed results.

- 5.8 Due to the strategic nature of the POP and the lack of detail on specific site locations, it was not possible to predict likely effects for all options. Those that scored as 'uncertain' will be further appraised at later stages of the plan-making process when site specific policies and locations are allocated, such as for travellers' accommodation, housing mix etc.
- 5.8 Likewise no sites have been allocated for housing at this stage, which explains uncertainty for some options, such as potential compatibility with the proposed Tall Building option.
- 5.10 Overall, the results of the interim appraisal show that the likely significant effects of the preferred options would be generally positive, with a small number of mixed effects. These results directly informed and influenced the development of our Draft Plan Strategy document.

- 5.11 Full details, including all reasoning for choosing preferred options and rejecting others, are presented in the main SA Report.

## 6. Appraisal of the Draft Plan Strategy

- 6.1 The next stage was to assess policy options and reasonable alternatives to deliver the plan's overall strategy. A total of 114 policy options were identified under the following main themes:



- 6.2 All options and alternatives were then appraised and compared to identify the likely effects, their level of significance, and the potential for mitigation measures.
- 6.3 The results were presented in detailed matrices and summary tables, which explain how reasonable alternatives were identified; how they were assessed and compared; what the preferred options were; and why the other alternatives were rejected. These are attached as appendices to the main SA Report.
- 6.4 Overall significant positive sustainability effects are predicted to result from the Draft Plan Strategy throughout the plan term and beyond, particularly in relation to growth, housing provision, accessible travel, economy and jobs, and the vitality and viability of the city centre.
- 6.5 A small number of neutral effects have been identified in relation to integrated transport systems and sustainable travel, whilst some neutral and minor negative effects are

predicted in relation to the sustainable management of waste; in particular should the ambitious growth aspirations of the plan be achieved. Nonetheless, such impacts can be minimised, mitigated and improved through suitable measures identified in the SA process, a precautionary approach to development within the plan area, and through the future delivery and implementation of other plans or strategies.

- 6.7 **Tables 4 to 6** on the following pages provide a summary of the likely significant effects identified through the appraisal.
- 6.8 **Table 7** provides a summary of the cumulative, secondary and synergistic effects appraisal of the preferred options.
- 6.9 **Table 8** provides a summary of reasons why alternatives were scoped out, why preferred options were selected and why others were rejected.

## Social Sustainability Objectives: SA1 – SA6

### Likely Significant Effects – Key Findings

#### SA1: Reduce deprivation and encourage an inclusive and equal society

The majority of the draft policies would have minor positive social effects, recognising the importance of good quality housing and building community cohesion in achieving balanced and inclusive communities, particularly in the many single identity neighbourhoods in Belfast that suffer from deprivation. These minor positives rise to significant positives as we move from the inner city, which has some of the most deprived areas, towards the more affluent outer city areas. Significant positive effects were also identified through accessible accommodation, increased employment options, community cohesion and interface uses, and a greater choice of affordable housing.

Improving wealth and economic opportunities provides significant positive effects through inclusive and accessible employment creation. A balanced approach to encouraging employment opportunities in local areas would subsequently have minor positive effects in reducing deprivation.

Improving accessibility and travel choices will have significant positives in terms of achieving a more inclusive and equal society, as would safeguarding environmental quality; specifically in inner city areas where environmental issues such as air and noise quality will be most problematic. Improving infrastructure and protecting the environment will bring minor positive benefits to society as a whole.

The Green and Blue Network would have significant positive effects as it seeks to ensure greater connectivity, accessibility and resilience. Elsewhere minor positive effects would be achieved by protecting and improving open space and safeguarding natural heritage for the benefit of all. This will help reduce inequality and exclusion whilst also meeting community needs, including rural communities.

#### SA2: Improve health and wellbeing for an improved quality of life

Better community cohesion demonstrates the link between good residential design, deprivation, and health and well-being, which is reinforced by significant positive effects. Minor positives would be achieved through increased employment opportunities and improved housing solutions and community cohesion; all of which are critical elements in creating and maintaining a healthy, well-balanced city with improved quality of life for all. Focusing retail development or services, and higher density housing, in locations that are highly accessible will also bring minor positives, and should reduce the need to travel by car, encourage the use of active travel modes etc.

Placemaking through master planning will bring significant positive effects. Shaping regeneration opportunities and improved connectivity will deliver high quality living and working environments, whilst more accessible economic and social opportunities provision in the city centre will encourage greater social interaction. All of these can promote healthy lifestyles, with direct benefits to quality of life, and physical and mental wellbeing. For the same reasons, minor positive effects would be achieved by supporting development to improve the natural and built environment, which may encourage more walking and cycling within local neighbourhood areas.

### Likely Significant Effects – Key Findings

Promoting accessibility and improved travel choices, in particular active travel, and improving environmental quality will have significant positive effects on human health. Improving infrastructure whilst protecting the environment will have minor positive effects on quality of life.

Significant positive effects would again be achieved through the Green and Blue network, together with the draft open space and trees policies; all of which seeks to ensure more active lifestyles and a high-quality attractive environment that promotes wellbeing. The remaining green and active policies will generally have minor positive effects as they seek to protect and improve open space and recreation facilities for the wellbeing benefit of all.

#### **SA3: To provide opportunity for good quality housing and enable people to meet their housing needs**

Generally significant and minor positive effects would be achieved across the housing and residential design policies. 31,600 new homes are proposed over the plan period, with a strong focus on provision of quality housing and meeting housing need, whilst allocation of housing land will be enabled through the settlement hierarchy. It is recognised that a lack of community cohesion can be a significant barrier to housing delivery, particularly affordable housing, which can then prevent housing need from being met in specific areas of the city. However, by supporting and facilitating development that improves good relations, we can help promote greater cohesion, improve relationships and provide opportunities for mixed-tenure housing in shared neighbourhoods.

Significant positive economic effects would be achieved due to high-quality mixed-use regeneration projects that will provide a variety of residential accommodation to meet housing need for diverse groups of people. Provision of a range of good quality housing types that can accommodate a diverse mix of need to suit demographic requirements would have minor positive effects.

Good quality housing with accessibility for all, in addition to policies that address environmental constraints and focus on the reuse of brownfield and contaminated land for housing, will also have significant positive effects.

The Green and Blue Network, together with the draft trees policies, seek to ensure access for residents to recreation and amenity spaces, which would have significant positive effects. Protecting and improving the quality of the natural environment and open space to support existing residents and new housing developments will have generally minor positive effects throughout the city.



## Likely Significant Effects – Key Findings

### SA4: Increase community safety by supporting the reduction of crime and antisocial behaviour

Good quality design and improved community cohesion would promote good relations, which can have positive social effects by helping reduce antisocial behaviour and crime in many of the existing deprived communities.

A number of the housing draft policies have uncertain effects in relation to reducing crime and ASB. This is due to the fact that the full effects will only be realised following the Local Policies Plan stage when the Plan is adopted and being implemented on the ground. Community safety can be improved by tackling the problems and inequalities of deprivation but would be an indirect or secondary effect that is less certain.

Minor positive economic effects would be obtained by encouraging good quality design and a greater diversity of land uses. Increased economic activity can generate greater footfall and improve urban vitality; improving natural, passive surveillance which can in turn help deter anti-social behaviour and reduce crime.

Whilst the majority of policies will have a neutral effect on community safety in terms of connectivity, positive effects were identified where the promotion of careful design and improved environmental quality can increase neighbourhood safety. Likewise, the encouragement of active travel routes and increased footfall would also have positive effects.

The Green and Blue Network will again have significant positive effects as it seeks to promote greater accessibility, connectivity and level of use of natural, recreation and amenity spaces. Protecting and improving the quality of the environment will create attractive, safe and inclusive neighbourhoods, which will have minor positive effects.

### SA5: To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities

Significant positive effects were noted for conversions and subdivisions, as these would facilitate increased choice of suitable accommodation for students. Likewise opening up the City's learning environments to communities historically perceived or actually excluded from educational facilities, particularly where new facilities are encouraged in accessible locations for all communities, would bring about significant positive change. Uncertain effects were identified as whilst improving community cohesion may attract some residents within deprived communities to feel more confident about accessing educational opportunities, the extent to which skills would be improved is uncertain at this stage.

Significant positive effects were identified under the policy support for third level educational facilities, which would facilitate training to improve skill levels and widen employment opportunities. Adopting a balanced approach to ensure adequate provision for lifelong education opportunities that are easily accessible by sustainable modes of transport, would result in minor positive effects.

Facilitating infrastructure, including telecommunications, which can improve access to education and skill development opportunities would also have a minor positive effect.

## Likely Significant Effects – Key Findings

### SA6: Retain and enhance access to local services and facilities

A plan-led approach to new residential development will have significant positive effects by ensuring that locations for new housing maximise the opportunity to be located close to, and take advantage of existing services and facilities, in addition to planning for new ones. Increasing densities, sub-division of properties, and meanwhile uses in interface areas would also bring about significant positives. Designating settlements in accordance with the level of facilities and services available to serve them, and providing better targeting of various policies, such as focussing retail development or services in locations that are highly accessible, will have minor positive effects. As with SA Objective 5, improving community cohesion may attract some within deprived communities to access more local services and facilities, however, the extent to which skills would be improved remains uncertain at this stage. Likewise, there are uncertain effects in relation to affordable housing as the location of new housing would only be known at LPP stage.

Significant positive effects would arise from mixed-use regeneration schemes that provide new local services and facilities to support the new population that will live and work in the city; as well as the potential to enhance a diverse range of key services in the city centre. Protecting and promoting the development of local services and facilities that are highly accessible by sustainable modes of transport would have minor positive effects.

Improving accessibility and promoting modal shift will have significant positive effects.

The Green and Blue Network seeks to promote greater accessibility and connectivity throughout the city, including to local services, which would bring about minor positive effects.

**Table 4: Key Findings for Social Objectives**

## Economic Sustainability Objectives: SA7 – SA9

### Likely Significant Effects – Key Findings

#### SA7: To ensure local residents have access to employment opportunities

Job creation, increased densities, provision of specialist residential accommodation, sub-division of properties, community cohesion and community infrastructure, and access to employment opportunities and facilities will result in significant positive effects. Minor positive effects will be achieved by ensuring greater connectivity between where people live and work. As with SA Objectives 5 and 6, the effects of improving community cohesion are uncertain, as whilst there may be improved access to local services and facilities, the extent to which skills would be improved is unknown at this stage. Likewise, as the location of new housing will not be known until LPP stage, the effects in relation to affordable housing are also uncertain.

Directing economic growth to development opportunity areas will bring significant positive effects by helping diversify land uses in the city centre, reflecting the wider economic structural changes resulting from knowledge economy growth. Integrating development areas with surrounding neighbourhoods would also ensure employment opportunities are accessible to local residents. Minor positive effects would be achieved through provision of good sustainable connections to a diverse range of employment opportunities suitable for a variety of skill sets. A variety of accessible employment creation opportunities in the City Centre would result in predominantly significant positive economic effects. Minor positive effects were noted with potential employment opportunities for local areas.

Support for improved telecommunication services will support business and an increase in employment opportunities, giving significant positive results. Improved infrastructure and accessibility across the city will generally result in minor positive or neutral effects.

The Green and Blue Network would have a minor positive effect on this objective as it seeks to promote greater accessibility and connectivity throughout the city, including to places of employment.

#### SA8: Support the economic development of Belfast as a competitive place and contribute to Belfast's roles as a regional economic driver

Significant positive effects were identified in relation to economic development, in particular residential design, community cohesion and provision of housing and affordable housing. This emphasises the importance of good design and housing in building up a skilled resident population to further economic development.

Enabling the city to compete with similar sized cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy will have minor positive effects. Likewise improving community cohesion and good relations will have city-wide benefits and help to attract inward investment from a range of business sectors, encouraging new start-ups and existing business to locate and expand in the city. Responding to wider economic structural changes through new innovation and growth of the knowledge economy can also help the city compete on a global level, which would have significant positive results. Provision of sufficient land to support a diverse range of economic

### Likely Significant Effects – Key Findings

development opportunities will strengthen Belfast position as the economic driver for the region, giving predominantly significant positive effects. Promoting sustainable inclusive economic growth, to diversify and strengthen the economy, and subsequently Belfast as the regional economic driver, will have minor positive effects. Minor positive effects would also be achieved by protecting existing economic uses. Designated as the region's Principal City by the RDS, the draft plan policies will ensure Belfast continues to function as the regional economic driver. The overall positive results for this objective are unsurprising given the plan's ambitious growth aspirations for Belfast, in accordance with the Belfast Agenda, RDS and SPPS.

Facilitating infrastructure necessary to support economic growth, improving resilience to flooding and attractiveness for investment will all bring significant positive results. A strong number of policies will also have minor positive effects on supporting economic development through infrastructure improvements and improving accessibility.

The Green and Blue Network and draft trees policy which will make the city an attractive city in which to live and work, thus bringing significant positive effects by stimulating economic growth. Elsewhere minor positive effects will be achieved through protecting and improving environmental quality; creating an attractive city which encourages economic investment.

#### SA9: Promote an integrated transport system and encourage sustainable travel

Significant positive effects have been identified through enabling better integration of land use planning and transportation through the city corridors, which should ensure greater connectivity between where people live and work. Higher densities, management of short term let accommodation, tall buildings, improved residential design and community cohesion would all have significant positive effects, as they would contribute to a more compact, populated city with balanced communities who have good access to public transport networks. The proposed population and economic development growth are likely to facilitate a well-integrated public transport system with a larger percentage of the population living closer to their place of work and to key local services and facilities, which would bring positive minor effects across the city. Uncertain effects have been noted as whilst increased community safety may encourage more people to navigate by sustainable travel means, including walking and cycling, the extent to which this policy would actively support integrated transport systems and sustainable travel is unknown. Uncertainties are also noted in respect of affordable housing and adaptable, accessible accommodation, as the locations of these homes are not known at this stage.

Supporting development to help deliver an efficient, compact city form that is served by a highly accessible integrated transport network based on public transport, cycling and walking, will result in a mixture of both significant and minor positive effects. The significant effects are likely with the city centre first retail policy approach that would enhance the opportunity for an economically viable sustainable travel network. The minor effects would stem from the same approach to economic development, which would build the critical mass to support sustainable travel and an integrated transport system.

### Likely Significant Effects – Key Findings

Support for sustainable travel will have clear significant positive effects on this objective. The draft transport policies seek to develop an integrated transport system with more sustainable travel modes, together with additional policy support to mitigate against environmental change.

The Green and Blue Network will have significant positive effects, with additional minor positives achieved by the open space and landscape policies, all of which facilitate a compact urban form and active travel. However, policies facilitating rural development may not promote sustainable transport modes in all cases.

**Table 5: Key Findings for Economic Objectives**

### Environmental Sustainability Objectives: SA10 – SA19

### Likely Significant Effects – Key Findings

#### SA10: Maintain and enhance biodiversity assets, and protect habitats and species

Whilst a number of draft policies would have neutral effects, policies that encourage good design, seek to protect existing open space and create new open space where necessary would all have minor positive effects. Uncertainties are noted in respect of housing mix as the location and mix of new homes are not known at this stage. Minor negative effects were identified as the pressure for growth may potentially impact on biodiversity, in particular due to increased housing and employment development pressures, even on brownfield sites.

In terms of economic issues, the draft policies would generally have no significant effect. The draft policies recognise that the protection and enhancement of the biodiversity assets, habitats and species is an important element within the context of sustainable development. The plan proposes a balanced approach to the integration of the three pillars of sustainable development (social, economic, and environmental factors), and ensuring none of these would be promoted over the other, which would result in minor positive effects. Potential pressure on biodiversity from new tourism facilities provided mixed effects, though this may be mitigated through habitat protection and enhancement. Some minor economic positives were identified under this objective from the economic policies, where development on existing sites in the city centre would be encouraged.

Implementing the Green and Blue infrastructure, which promotes habitats and biodiversity, would have significant positive effects. In contrast, the waste infrastructure has the potential to have negative effects on this objective due to the size and nature of the facilities.

## Likely Significant Effects – Key Findings

In addition to the Green and Blue Network, significant positive effects were also identified for the natural heritage and trees policies, which seek to protect and promote a connected network of natural resources and biodiversity. The remaining policies that seek to protect and improve the quality of the environment, including natural heritage, would have minor positive effects.

### SA11: Protect and enhance soil quality

Bringing existing contaminated brownfield sites back into active use, as a result of economic growth, would have minor positive effects on soil quality. Likewise, the prioritisation of brownfield sites, a windfall allowance within the urban footprint, higher densities and the protection of residential stock would all help to protect soil quality on greenfield sites and could lead to actual improvement of soil conditions on some contaminated brownfield sites. The protection of parks, gardens and demesnes, together with the active use of interface sites, would also help to protect soil quality and could also lead to contaminated sites being improved to facilitate new development. Otherwise, a number of draft policies would result in neutral effects on soil quality.

A balanced approach to delivering sustainable development would have predominantly minor positive effects. In particular the promotion of brown field sites for economic development within the urban area has the potential for remediation works to improve soil conditions. Mixed effects were recorded due to potential pressure for developing greenfield sites for new tourism facilities.

Protecting the natural environment and promoting ecosystem services will generally have minor positive effects, however potential minor negative effects may also occur as landfilling can lead to soil pollution.

Significant positive effects were identified from the draft trees policy in particular, on account of their positive benefits for ecosystem services, including water quality and soil quality/stability. Protecting and improving the quality of the natural environment would generally have minor positive effects.

### SA12: Protect, conserve and enhance the historic environment, heritage assets and their settings

Significant positive effects are identified as economic growth and increased housing growth could provide opportunities to bring disused, brownfield and heritage assets back into use, thereby enhancing streetscapes and revitalising long-standing areas of dereliction. As would be expected, the majority of the built heritage draft policies would also have significant positive effects as they which seek to protect, conserve and enhance the historic environment and heritage assets. Whilst the draft windfall policy would maximise opportunities to reuse historic buildings and preserve the historic character of streets and townscapes; there is a risk that as pressure for land increases over time, the historic environment could come under more pressure for demolition. As such this resulted in mixed effects. The remaining housing policies, relating mainly to new builds, would have neutral effect.

In proactively promoting development the city's built heritage would be protected and enhanced through the careful stewardship of the built environment, resulting in minor positive effects. A balanced approach would again ensure that none of the three pillars of sustainable development is promoted over the others. Retaining the built environment and promoting the refurbishment and re-use of existing buildings

### Likely Significant Effects – Key Findings

can also help retain the city’s distinctive character and attractiveness. However, and notwithstanding the potential to enhance a sense of place through the adaptation and reuse of historic buildings, it is noted that development pressure for new builds may result in some loss of built heritage; thus mixed effects are recorded.

The provision of essential services may have some negative impacts on the historic environment and heritage assets.

Significant positive effects were again noted for the draft trees policy due to their positive benefits for built heritage settings. Minor positive effects would also be achieved through the protection and improvement of landscape quality and the environment, which also affects the townscape quality.

#### SA13: Protect, maintain and enhance the quality of Belfast’s distinctive landscape and geodiversity

The draft built heritage policies would help protect historic buildings that contribute to Belfast’s landscape setting and are likely to have significant positive effects. Similar effects would also be achieved through the retention of archaeology sites, conservation areas, ATC’s and parks, gardens and demesnes that contribute to landscape setting, geodiversity and historic character. Minor positive effects are also expected as the proposed growth is capable of being accommodated within the existing urban footprint, preventing pressure on sensitive landscapes and geodiversity.

Protection and enhancement of the city’s distinctive landscape setting and geodiversity is an important element within the context of sustainable development, and the balanced approach of the plan will have minor positive effects. Recognising the landscape and geodiversity as a distinctive tourism asset will also have minor positive effects.

Waste infrastructure has the potential to have minor negative effects on landscape quality due to size and nature of the facilities.

Enhancing the quality of green assets, open spaces, important landscapes and the setting of the city in general will have significant positive effects. Protecting and improving the natural environment and the countryside will have minor positive effects.

#### SA14: Protect and enhance open space and natural greenspace including Belfast’s countryside asset

The proposed design, community cohesion and interface area policies would result in minor positive effects on green space and countryside. It is also noted that provision of housing and affordable housing within the development limits, along with higher densities and a focus on brownfield development, can offset the pressure for development on green spaces and in rural areas. The presence of small settlements should ensure that rural housing need can be met without recourse to the open countryside, which would be a minor positive effect. However, whilst pressure on the countryside should be minimised, some brownfield sites that have re-colonised as green space may come under pressure to be redeveloped, which would have mixed effects.

### Likely Significant Effects – Key Findings

The city centre first policy approach focuses on existing brown field sites and recognises that open and green spaces are an important asset, which will have a significant positive effect. Minor positive effects are also identified through the balanced approach to delivering sustainable development, which reflects the importance of protecting and enhancing open spaces, green spaces and the countryside.

Waste infrastructure again has the potential for minor negative effects on the countryside due to size and nature of the facilities.

Enhancing the quality of green assets, open spaces, important landscapes and the countryside around the city will have significant positive effects. Protecting and improving open space, the natural environment and the countryside will have minor positive effects.

#### SA15: Promote the sustainable management of waste

Significant positive effects would result from draft policies on density and residential design, as higher densities alongside well designed and integrated new housing can assist in more sustainable waste management. Whilst increased growth will lead to an increase in waste, which would have minor negative effects, minor positive effects are identified as the waste arising from the proposed growth can be accommodated within existing infrastructure.

Supporting the reduction of waste will have minor positive effects. Again, whilst minor negative effects are noted as population and economic growth will increase the amount of waste generated, this can be mitigated with the reuse of existing buildings to minimise construction waste, and the provision of recycling facilities to promote a circular economy approach to reuse, recycle and minimise waste.

Facilitating an increased resource efficiency and a shift to the circular economy will have significant positive effects. This will be further supported by mitigation against environmental change, including the promotion of recycling and the circular economy.

The green and active policies generally have no effects on this objective.

#### SA16: Promote the quality, efficient use of water resources

Belfast has a healthy supply of water, so this is not considered to be an issue for growth. Similarly, the economic growth is not envisaged to include heavy industry that would require significant volumes of water usage. Supporting priority brownfield development and factoring in a windfall allowance would require less new infrastructure, and with concentration of population within the urban footprint, it is cost effective. However, there are capacity issues with the existing Waste Water Treatment (WWT) facilities in Belfast, which could prove to be a risk in the short term, and subsequently both uncertain and mixed effects are noted for this reason. Likewise, whilst development could be facilitated within the existing urban footprint, the locations of interface areas are fixed and there may be infrastructure implications, so mixed effects are again identified.

For the same reasons above relating to the WWT capacity issues, effective management of infrastructure throughout the plan period will be required as development progresses to ensure quality and efficiency is maintained in the long term. Economic effects are therefore also likely to



### Likely Significant Effects – Key Findings

be mixed, in particular as an increase in economic development will produce more wastewater, which could potentially exceed the existing WWT capacity if it is not managed efficiently throughout the plan period.

Facilitating infrastructure to encourage better quality and efficient use of water will have significant positive effects. This is further supported through the promotion of water quality protection and reduction of carbon emissions.

Protecting and improving the quality of the natural environment, in particular the benefits of trees for water quality, has resulted in both significant and minor positives under this objective.

#### SA17: Reduce air pollution and ensure continued improvements to air quality

The potential to address peace walls and create or renew access to neighbouring areas, in order to promote connectivity and enhance permeability, will help to reconnect the city and would have significant positive effects. The consequential benefits of this include reduced commuting distances and improved linkages between different areas, reducing the need to travel further by vehicle and encouraging travel by foot or bicycle. This would also assist in improving air quality.

Accommodating people and jobs within the city will reduce travel distances and have a minor positive effect on air quality. In addition, new economic development continues to embrace clean green technologies and is compatible with an increasingly digital economy. Better integration of land use planning and transportation through the city corridors, reducing the need to travel and encouraging more sustainable travel options, will help to reduce air pollution associated with the private car and also result in minor positive effects. Restricting uses in retail warehousing sites may help to minimise the number of car journeys.

Supporting the requirement for new development sites to be highly accessible to public transport, within easy walking and cycling distance that could help to reduce air pollution, will have minor positive effects. This also reduces emissions from less sustainable modes of transport. Increased economic development does however have the potential to increase the number of cars travelling into the city and is therefore identified as a mixed effect. Overall, however, improved accessibility and reducing the need to travel will have significant positive effects; reducing emissions and pollution to improve air quality through modal shift.

Significant positive effects are again identified for the Green and Blue Network and draft trees policy, due to their positive benefits through ecosystem services. Further minor positive effects are noted through the general protection and improvement of open space and the natural environment, which have subsequent positive effects on air quality.

## Likely Significant Effects – Key Findings

### SA18: Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy

Significant positive effects are identified as higher densities means more compact cities, reducing the need to travel and thereby helping to reduce emissions and support a shift to a lower carbon economy. Delivering an increased population whilst maintaining a compact urban form will ensure residents are located close to places of work, encouraging more sustainable travel modes than the private car, which will make minor positive contributions to the aim of a low carbon economy. In the absence of knowing where new housing will be located, at this stage there are uncertain effects in terms of affordable housing, housing mix and accessible/adaptable accommodation.

Significant positives are identified as comprehensive, sustainable mixed-use schemes will promote working and living in the city centre, walking and cycling, and district heating from renewable energy which will support the transition to a low carbon economy. Supporting the requirement for new development sites to be highly accessible to public transport, and within easy walking and cycling distance, could help to reduce greenhouse gas emissions, thus having minor positive effects. Minimising car journeys and promotion of sustainable travel will reduce emissions, whilst supporting sustainable development will promote renewable energy and passive design solutions, reducing greenhouse gas emissions and supporting the transition to a low carbon economy. Mixed effects are noted where increased economic development may increase the number of cars travelling into the city, prompting an increase in emissions. The positive effects under this objective could be further enhanced by ensuring that new economic development can employ new technology that makes a positive contribution to the transition to a low carbon economy.

Improving accessibility and reducing the need to travel will have significant positive effects, as will facilitation of renewable energy schemes and a shift towards a circular economy.

The Green and Blue Network and trees policies will have significant positive effects due to their positive benefits through ecosystem services. Elsewhere, protection and improvement of the natural environment and encouraging more active travel will have minor positive effects on reducing greenhouse gas emissions.

### SA19: Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk

Mixed effects are noted as increased development could lead to increased risk of flooding, although this could be partially offset through use of more sustainable construction methods and flood risk mitigation. Many brownfield sites will be at flood risk and require further assessment at application stage. Also, taking windfall housing in isolation (i.e., in the absence of higher densities etc.) would mean that more development land would be required, thereby increasing flood risk. Mixed effects are again identified for these reasons. As the impact on flood risk will depend on the location of individual developments, which is unknown at present, uncertain effects are also noted.

Encouraging more energy efficient design and sustainable travel modes of travel through better integration of public transport, walking and cycling routes will have minor positive effects. This would contribute positively to climate change goals through a reduction in greenhouse gas

### Likely Significant Effects – Key Findings

emissions to help mitigate climate change. The integration of a blue and green infrastructure network would also help to mitigate potential flood risk. Policy support for sustainable economic development and enhanced connectivity may help to mitigate and adapt to climate change, bringing minor positive effects. Mixed effects were noted due to the potential for more hardstanding with greater run-off and surface water flooding. However, a green and blue infrastructure network could help to mitigate the impact.

Improved accessibility and reducing the need to travel will have significant positive effects, as will promoting active travel, reducing air pollution caused by motorised traffic, encouraging environmental change and seeking to ensure a resilient city.

As with previous objectives, the positive ecosystem services benefits of the Green and Blue Network and trees policies will have significant positive effects. Minor positives will also be achieved through protecting and improving the natural environment and promoting of active travel; all of which have positive effects on greenhouse gas emissions and climate change.

**Table 6: Key Findings for Environmental Objectives**

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<b>SOCIAL OBJECTIVES</b>		
1. Reduce deprivation and encourage an inclusive and equal society	++	The provision of quality housing, with an improved, more competitive city supported by quality infrastructure and greater employment opportunities, together with a healthy, green and active environment should help to reduce deprivation for all and promote equality in society. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be significantly positive.</b>
2. Improve health and wellbeing for an improved quality of life.	++	As for SA1, where the policies of the draft plan cumulatively would have a significant positive effect, this would improve the general health and well-being of the population for improved quality of life. Also considered to have significant positive effects. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be significantly positive.</b>
3. To provide opportunity for good quality housing & enable people to meet their housing needs	++ ↑ Increased Significance	HOU1, in setting out housing requirements, would have a significant contribution to make towards the provision of new housing over the plan period.  Aside from HOU1, which seeks the provision of 31,600 new homes to grow the city, draft policies HOU2, HOU3, HOU4, HOU5 and HOU6 in particular have the potential to create a synergistic effect: reinforcing a significant positive effect on SA Objective 3 over the lifetime of the Plan. <b>Whilst this will not change the overall score, the significance of the positive effects should increase over time as a result.</b>
4. Increase community safety by supporting the reduction of crime & antisocial behaviour	++	Community safety should be improved as a result of the DPS policies and therefore the plan would have mostly minor positive effects.  Taking policies HOU5, CGR1, CGR2 together has to potential to have a synergistic effect on SA Objective 4. The provision of good quality housing, together with enhanced good relations and the redevelopment of contested spaces, can make people happier, less fearful about crime and reduce instances of disturbance, intimidation and antisocial behaviour. <b>Such effect is considered to increase the overall cumulative effect from minor to significant positive.</b>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
5. To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities	++	<p>One of the measurements of deprivation is educational attainment. Through improved housing, provision of affordable housing, a better environment, a more liveable place, improved accessibility and more job opportunities, people would be considered more likely to avail of educational and training opportunities. Such opportunities are also likely to increase through the growth of the city, which is the foundation of the LDP. As a suite of policies therefore, the DPS would be considered to have synergistic cumulative effects in helping more people to attain the skills and education that will assist them throughout their lives. <b>The overall cumulative effect is therefore considered to increase from minor to significant positive.</b></p>
6. Retain & enhance access to local services & facilities	++ ↑ Increased Significance	<p>HOU4, RD3, CGR1 and CGR2 would have a significant contribution in terms of ensuring access to local services and facilities.</p> <p>Additional policies HOU3, HOU8, HOU9, HOU12, HOU13, HC1 and CI1 could create a synergistic effect, reinforcing a significant positive effect on SA Objective 6 over the lifetime of the plan. <b>Again, whilst this will not change the overall score, the significance of the beneficial effects should increase over time.</b></p>
<b>ECONOMIC OBJECTIVES</b>		
7. To ensure local residents have access to employment opportunities: Individual issues	++ ↑ Increased Significance	<p>Similar to SA Objective 6 above, where a policy would retain and enhance access to local services and facilities, it will also provide access to employment opportunities.</p> <p>Various housing, urban design, community cohesion and community infrastructure policies, when taken together have the potential to have a synergistic positive effect on SA Objective 7. Specifically, policies HOU4, HOU8, RD3, CGR1, CGR2 and CI1 will be of benefit in providing access to employment opportunities; <b>therefore, the overall cumulative effect is considered to increase from minor to significant positive.</b></p>
	?	<p>The Plan Strategy is promoting inclusive employment growth through the provision of a range of jobs at different skills level within defined economic sectors over the Plan Period. This is to support the Belfast's Agenda target to secure 46,000 additional jobs by 2035.</p> <p>Government policy for Brexit has the potential to synergistically <b>reduce the overall effect from significant positive to unknown</b>. The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities leading to reduced inclusive employment creation.</p>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
		Likewise potential currency fluctuations due to Brexit may deter or reduce tourism numbers; and the levels of predicted out-of-state expenditure may not be achieved to meet the Belfast target of £500m by 2021.
7. To ensure local residents have access to employment opportunities: Consolidated issues	+	Consolidating the cumulative effects identified above for SA objective 7 and taking consideration of the specific reasons affecting each score, the cumulative effects for this sustainability issue are considered <b>to reduce from significant to minor positive</b> .
8. Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver	?	<p>The Draft Plan Strategy seeks to ensure sufficient land is available to support the growth of defined economic sectors. This will encourage and promote innovation and the knowledge economy, enabling Belfast to be a competitive city that attracts businesses and talent. This reflects and supports the Belfast's Agenda target to secure 46,000 additional jobs by 2035.</p> <p>Government policy for Brexit again has the potential to synergistically reduce the overall effect. The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities, leading to reduced business creation and foreign direct investment.</p> <p>There is also a possible synergistic effect due to the proposed Belfast Transportation Plan which is being prepared by the Department for Infrastructure. There is a risk that this may not adequately plan for sustainable travel, and to mitigate the potential increase in private car commuting due to the LDP's proposed level of economic growth, which predicts to secure 46,000 additional jobs by 2035. This would significantly affect the ability to achieve positive effects under the objective, as demand for parking spaces may increase, which could subsequently erode available land required for economic growth.</p> <p>There is also the potential for secondary, indirect effects of increasing greenhouse gas emissions; compromising the city's ability to mitigate climate change and air pollution that would negatively impact the health of people living and working in Belfast.</p> <p>The lack of an Executive to make strategic economic decisions concerning funding for economic investment and infrastructure development may also have a significant synergistic effect on the ability to deliver the objectives and targets of both the LDP and Belfast Agenda.</p> <p><b>Given that we do not yet know the extent that these influencing factors may have on any impact, the cumulative score is concluded to be uncertain.</b></p>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
9. Promote an integrated transport system & encourage sustainable travel: Individual issues		The Draft Plan Strategy is considered to have an overall minor positive effect on SA objective 9. Locational aspects of housing policies including HOU4, HOU8, HOU9 and HOU12; principles within urban design policies DES1, DES2, and RD1; together with improved community cohesion and good relations (CGR1); have the potential to create a positive synergistic effect on SA Objective 9 by improving accessibility and connectivity and encouraging greater levels of sustainable travel. <b>The overall cumulative effect is therefore considered to increase from minor to significant positive.</b>
		The proposed TRAN policies will have positive effects as they seek to develop an integrated transport system and more sustainable travel. However, the LDP objectives of increased growth in population and jobs in the city have the potential to create an indirect negative effective through greater demand for travel. This could neutralise the policies to facilitate and promote active travel and sustainable modes of transport, subsequently <b>reducing the effect from minor positive to minor negative.</b>
		On the other hand, the Department for Infrastructure’s revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. <b>In such a scenario the minor positive effect would be retained overall.</b>
		<b>Given that we do not yet know to what extent the Department’s plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.</b>
9. Promote an integrated transport system & encourage sustainable travel: Consolidated issues		<b>Consolidating the cumulative significant positive and unknown effects above, and taking consideration of the specific reasons affecting each, the overall cumulative effects for SA objective 9 are considered to remain as minor positive.</b>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<b>ENVIRONMENTAL OBJECTIVES</b>		
Consolidated Environmental Objectives: 10. Biodiversity 11. Soil Quality 12. Historic Assets 13. Landscape 14. Open space 16. Water Resources 17. Air Quality 18. Low carbon 19. Climate Change	+	<p>The plan’s growth strategy, which sees a significant rise in population over the plan period, will inevitably add pressure for additional housing land. Whilst much of this will be directed at inner city and brownfield sites, some sites may have an impact on undeveloped land and biodiversity, which has the potential to affect the green and active objectives generally. Nonetheless the draft policy approach seeks to ensure a sustainable approach and meet the environmental objectives. The plan’s growth strategy is based on sustainable growth, maintaining a compact urban form, seeking to increase densities, reducing the need to travel and facilitating sustainable travel modes. These policy approaches, taken together, should ensure that the development strategy and future growth is sustainable and does not prejudice or undermine the environmental objectives, including the objectives around climate change, greenhouse gas emissions and resilience.</p> <p>Many of the green &amp; active policies are in accordance with national planning policy and other existing statutory requirements. These include meeting our obligations in terms of natural heritage, biodiversity, water quality and climate change. In this regard, the draft policies help to secure the statutory and agreed policy approach, insofar as the LDP, as a land use planning tool, can assist in meeting these overall aims and objectives. The plans and programmes of others, including government departments and state agencies, are also set within the same overall macro-policy and regulatory framework. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be minor positive.</b></p>
15. Promote the sustainable management of waste	-/+	<p>Population growth will likely have an indirect effect leading to a direct increase in waste generation. Policies to move towards reduce, reuse and recycling and technological advances will aim to neutralise this over the plan period, however; there may still be a minor negative cumulative effect in the short term until such times as sufficient infrastructure and services are developed and implemented in the plan area.</p> <p>Synergistic effects are possible between HOU2, HOU4, RD1 and RD2, in that they can combine to work towards a compact, sustainable city with well-integrated and designed developments that can make waste management easier and more efficient. <b>The overall cumulative effect therefore has the potential to increase to minor positive in the longer term.</b></p>

**Table 7: Cumulative, Secondary & Synergistic Effects Appraisal**



Draft Policy	Reasons for Selecting Preferred Options
<b>Where Reasonable Alternatives were Scoped Out</b>	
Various	Option required to uphold the aims of current legislation, regulations, or directives
	Option required to uphold the aims of RDS, SPPS, Council Strategy or Supplementary Guidance
	Option required to uphold the aims of existing regional policy approach of PPS
	POP identified inclusion of specific policy in LDP as the only realistic option
	DPS identified inclusion of specific policy in LDP as the only realistic option
	No reasonable alternatives were identified based on the scoping evidence
	Only one realistic option identified for high-level criteria-based policy
<b>Selecting Reasonable Alternatives</b>	
SD2	Preferred option allows for a range of policies within the LDP to target new development to the most appropriate locations. It provides greater variation, which could have significant positive implications when combined with other plan policies.
SD3	In line with the RDS, the preferred option will make significant positive contribution to economic development and encourage a more managed approach to regeneration and re-use of the historic built environment.
HOU1	In line with the RDS, the preferred option will provide better certainty around development proposals and investment and encourage a more managed approach to regeneration and re-use of the historic built environment.
HOU2	The rejected option could negatively impact the growth strategy and sequential approach proposed for development. In line with the SPPS the preferred option seeks to provide clarity and ensure the plan's ability to deliver robust, sustainable communities.
HOU3	The preferred option would benefit fundamental sustainability objectives. Not having this option could negatively impact the ability to meet affordable housing need, and the achievement of a compact urban form and sustainable patterns of development.
HOU4	The preferred option will ensure the protection of established character and patterns of development, with flexibility for proposals to adapt to their context. The rejected option is less flexible and would not sufficiently account for growth aspirations, local character and environmental quality.
HOU5	The preferred options of the four components give a comprehensive and complete affordable housing policy for the plan

Draft Policy	Reasons for Selecting Preferred Options
HOU7	The preferred option takes account of the wider cost benefit analysis implications of Belfast’s role as an age-friendly city, recognising the need to address current wheelchair accessible housing shortage and to proactively manage availability of homes to meet disabled persons’ needs
HOU13	The preferred option will meet fundamental objectives relating to access to quality housing, economic development, and efficient use of water resources and air quality. The rejected option could negatively impact the ability to meet affordable housing need
DES2	The preferred option will manage major applications, enabling comprehensive and coordinated development and helping avoid piecemeal schemes
DES4	The preferred option aims to protect and enhance the character of the city and promote a high standard of quality design
RD1 & RD2	Consolidating the combined, preferred options of the two components gives a comprehensive residential development design policy for the plan
RD3	Combining the preferred options of the two components gives a comprehensive residential development design policy for the plan
EC2	The preferred option is the most realistic to achieve baseline economic growth over the plan period, whilst the rejected option could not
TLC1	The preferred option recognises Belfast as the regional focus of tourism, leisure and cultural amenities and seeks to improve facilities for tourists to build a strong city break destination. It provides better certainty for development and investment decisions, to deliver the council’s Belfast Agenda and Integrated Tourism Strategy

**Table 8 – Summary of Reasons for Selecting Preferred Options**

## 7. Limitations and difficulties encountered

- 7.1 Within a process of this nature it is acknowledged that there a number of limitations. In particular, these can derive predominantly from the strategic, high nature of an assessment at plan level. In addition, whilst there are operational policies in the DPS, some of which relate to designated areas, they are in the main not site-specific and are intended to apply across the entire area.
- 7.2 The strategic policies in particular are effectively divorced from the locational aspect, which means that some social and economic effects cannot be fully assessed until such times when assessing and prioritising sites to be zoned at LPP stage.
- 7.3 Likewise, assessment of many of the environmental aspects is not fully possible at this stage and will need to be considered in more detail where the specific zoning of sites will be progressed.
- 7.4 In addition to locational uncertainties, the absence of knowing what market conditions may be like in the future means it is not possible to fully determine likely effects for certain options. Furthermore, for many of the draft policies on environmental protection and heritage policies, there were no alternative options as the LDP requires to be consistent with extant national and regional planning and environmental policy.
- 7.5 The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.
- 7.6 As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific

difficulties encountered are set out in the main SA Report.

## 8. Recommendations

8.1 Whilst the appraisal of the Draft Plan Strategy predicts a range of generally positive sustainability effects, a number of recommendations have been proposed to help minimise negative impacts and maximise the sustainability performance of the plan. These are presented in **Section 5.8** of the **SA Report**, and include the following:

- ▶ Policies have been strengthened or introduced to ensure suitable measures are in place to appropriately manage the impact of development,
- ▶ Criteria based policies have been worded to directly mitigate impacts on social, economic and environmental factors, and to control or restrict specific development to exceptional, criteria-based circumstances. This will be further emphasised through the Local Policies Plan,

- ▶ Flexibility has been introduced where required to ensure appropriate balance and avoid conflicting prejudice,
- ▶ Management plans, assessments and statements are a requirement of relevant policies to demonstrate suitable levels of protection, mitigation or enhancement for development proposals,
- ▶ Delivery of the Green & Blue infrastructure network is actively encouraged and promoted through the draft policies, and will continue through the Local Policies Plan,
- ▶ Conditions, agreements and enforcement measures will manage impact and aftercare of specific proposals.

## 9. Monitoring

- 9.1 The SA Report provides a proposed monitoring framework to measure the implementation of the LDP in relation to the social, economic and environmental baseline aspects which were assessed as likely to be significantly affected, or where opportunities for an improvement in sustainability performance may arise.
- 9.2 Monitoring for the SA will be aligned with that of the LDP itself and our Community Plan, The Belfast Agenda, both to avoid duplication and ensure that appropriate remedial action can be taken where required. The proposed monitoring measures are presented in **Section 6** of the SA Report.

## 10. Next Steps

- 10.1 Following publication of the Draft Plan Strategy, the SA Report and updated Scoping Report, representations are invited through the subsequent consultation process. Modifications to each may be

made in response to consultation, and any significant changes to the plan will be subject to additional appraisal.

- 10.2 SEA Regulations require the council to produce a formal, post-adoption SA Statement to accompany the Plan Strategy, as soon as reasonably possible after its adoption. This statement will outline how the SA process has informed and influenced the plan preparation and decision-making process and demonstrate how consultation on the SA was taken into account.

## 11. Consultation Arrangements

- 11.1 The SA Report and Scoping Report are available for consultation alongside the Draft Plan Strategy and supporting documents, including the HRA and EQIA, for a statutory consultation period of **eight weeks**, from **20 September** to **15 November 2018**. Prior to this it will also be available for review for a **four-week** period; from **23 August** to **20 September 2018**. It can be viewed online on our [Local Development Plan webpage](#).

[www.belfastcity.gov.uk/ldp](http://www.belfastcity.gov.uk/ldp)). Hard copies can be viewed at the above address.

- 11.2 Responses to this consultation exercise should be sent to [localdevelopmentplan@belfastcity.gov.uk](mailto:localdevelopmentplan@belfastcity.gov.uk) and:

**Belfast Planning Service  
Cecil Ward Building  
4-10 Linenhall Street  
BELFAST  
BT2 8BP  
02890 500510**









# Belfast Local Development Plan

**Sustainability Appraisal Report August 2018**

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

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



**Belfast**  
City Council

Energising  
**Belfast**



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## Abbreviations

SA:	Sustainability Appraisal
SEA:	Strategic Environmental Assessment
SEA Directive:	Strategic Environmental Assessment EU Directive 2001/42/EC
EAPP:	The Environmental Assessment of Plans & Programmes Regulations (Northern Ireland) 2004
DPPN:	The Northern Ireland Development Plan Practice Note 04
PPP:	Plan, policy and programme review
LDP:	The Belfast Local Development Plan 2035
SCI:	Statement of Community Involvement
SES:	Shared Environmental Services, Mid & East Antrim Council
Dfi:	Department for Infrastructure
DAERA:	Department for Agriculture, Environment and Rural Affairs
NIEA:	Northern Ireland Environment Agency
HED:	Historic Environment Division
RDS:	The Regional Development Strategy 2035
SPPS:	Strategic Planning Policy Statement
PPS:	Planning Policy Statements
BMAP:	Belfast Metropolitan Area Plan 2015
BUAP:	Belfast Urban Area Plan
HRA:	Habitats Regulations Assessment
HIA:	Health Impact Assessment
EQIA:	Equality Impact Assessment
SAC:	Special Areas of Conservation
SPA:	Special Protection Areas
WFD:	Water Framework Directive
LWWP:	Living with Water Programme
RBMP:	North-East River Basin Management Plan
SUDS:	Sustainable Urban Drainage Systems
HMO:	Houses in Multiple Occupation





# 1 INTRODUCTION

## 1.1 Purpose of this report

1.1.1 This Sustainability Appraisal Report has been prepared by Belfast City Council in accordance with:

- Sections 8(6) and 9(7) of the Planning Act (Northern Ireland) 2011,
- Regulation 15 and 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, and
- The Environmental Assessment of Plans & Programmes Regulations (Northern Ireland) 2004 (EAPP).

1.1.2 The report presents an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Draft Plan Strategy of the Belfast Local Development Plan 2035 (LDP), and forms part of the evidence base upon which the LDP is based. It incorporates the Environmental Report which is required in accordance with SEA; where reference is made to SA throughout this report, it denotes SA incorporating the SEA requirements.

## 1.2 The study area

- 1.2.1 Belfast is our capital city and lies at the heart of a wider urban metropolitan area that dominates the east of the region.
- 1.2.2 Bordered by the neighbouring council areas of Mid & East Antrim Borough; Lisburn & Castlereagh City; and North Down & Ards District, it is the largest of the 11 new local government districts that were formed in April 2015.



**Image 1: Belfast Local Government District**

1.2.3 It drives much of the economic growth across the province and given its strategic location, it is the major gateway to Northern Ireland and the primary administrative, retail and commercial location in the region.

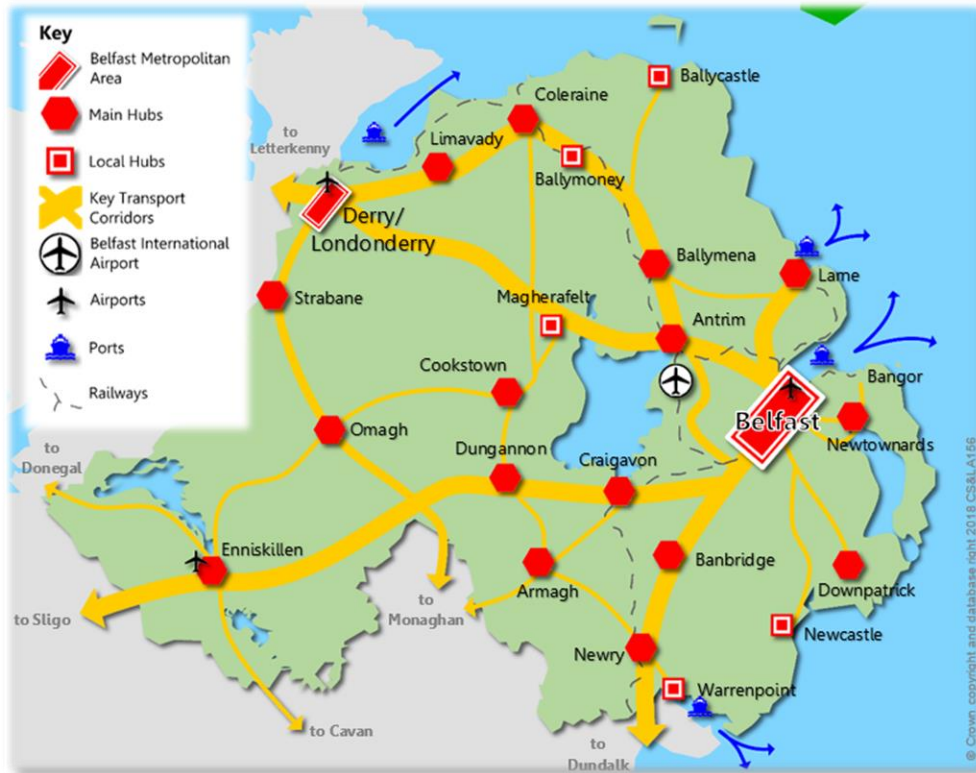


Image 2: Northern Ireland Key Infrastructure

1.2.4 In 2014, the Belfast City Council area had a total population of roughly 283,166. By 2015, this was estimated to have risen to 338,907<sup>1</sup>; which is approximately 18 percent of the Northern Ireland population and an increase of more than 53,000. This was a result of the city boundary expansion in April 2015, which saw Belfast take in additional residents from Castlereagh Borough Council, Lisburn City Council, and a small section from North Down Borough Council. The most recent 2017 figures show a population of 340,220 residents.

<sup>1</sup> [Demographic Statistics Branch \(NISRA\)](#)

1.2.5 Today the Belfast district covers a total area of 137.7 square kilometres; of which 30 percent is defined as 'rural', which means land outside the settlement development limits. It consists of Belfast City and the 3 small settlements of Edenderry, Hannahstown and Loughview.



Image 3: Belfast District Settlements

### **1.3 The Belfast Local Development Plan 2035**

- 1.3.1 The LDP is being prepared in line with Part 2 of the Planning Act (Northern Ireland) 2011. Providing a planning strategy for the council area, it will be fundamental in the council's efforts to deliver sustainable development that reflects the vision and aspiration of local communities. It will address the needs and opportunities of Belfast as well as establishing a basis for safeguarding the environment, adapting to climate change and ensuring good design.
- 1.3.2 Once adopted, the LDP will replace all previous, extant local development plans, such as the draft Belfast Metropolitan Area Plan (BMAP) 2015 insofar as it relates to Belfast city, the Belfast Urban Area Plan (BUAP) 2001, and the Houses in Multiple Occupation (HMOs) Subject Plan for the Belfast City Council Area 2015.
- 1.3.3 **LDP Box 1** sets out the key facts relating to our new plan.

## LDP Box 1: Belfast Local Development Plan – Key Facts

<b>Name of responsible authority:</b>	Belfast City Council
<b>Title of programme:</b>	Belfast Local Development Plan 2035
<b>What prompted the plan:</b>	It is a local development plan prepared in accordance with the Planning Act (Northern Ireland) 2011 and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015
<b>Subject:</b>	Spatial development planning
<b>Period covered:</b>	2020 to 2035
<b>Frequency of updates:</b>	<ul style="list-style-type: none"> <li>▶ Annual monitoring report</li> <li>▶ Review every 5 years</li> </ul>
<b>Area covered:</b>	The administrative area of Belfast City Council
<b>Purpose and scope of the plan:</b>	<ul style="list-style-type: none"> <li>▶ Establishes the strategic spatial strategy</li> <li>▶ Allocates sites to meet the city's development needs between 2020 and 2035</li> <li>▶ Sets development management policies against which individual proposals can be assessed</li> </ul>
<b>Contact point:</b>	Belfast Planning Service Cecil Ward Building 4-10 Linenhall Street Belfast, BT2 8BP T: 02890 500510 Email: <a href="mailto:localdevelopmentplan@belfastcity.gov.uk">localdevelopmentplan@belfastcity.gov.uk</a>

1.3.4 The Draft Plan Strategy is the first of two formal documents that make up the LDP (**Figure 1**). It sets out a strategic policy framework for the plan area as a whole across a range of topics and will be published for public consultation and independent examination before it is adopted. Following its adoption, we will prepare, publish and adopt the Local Policies Plan using the same process.

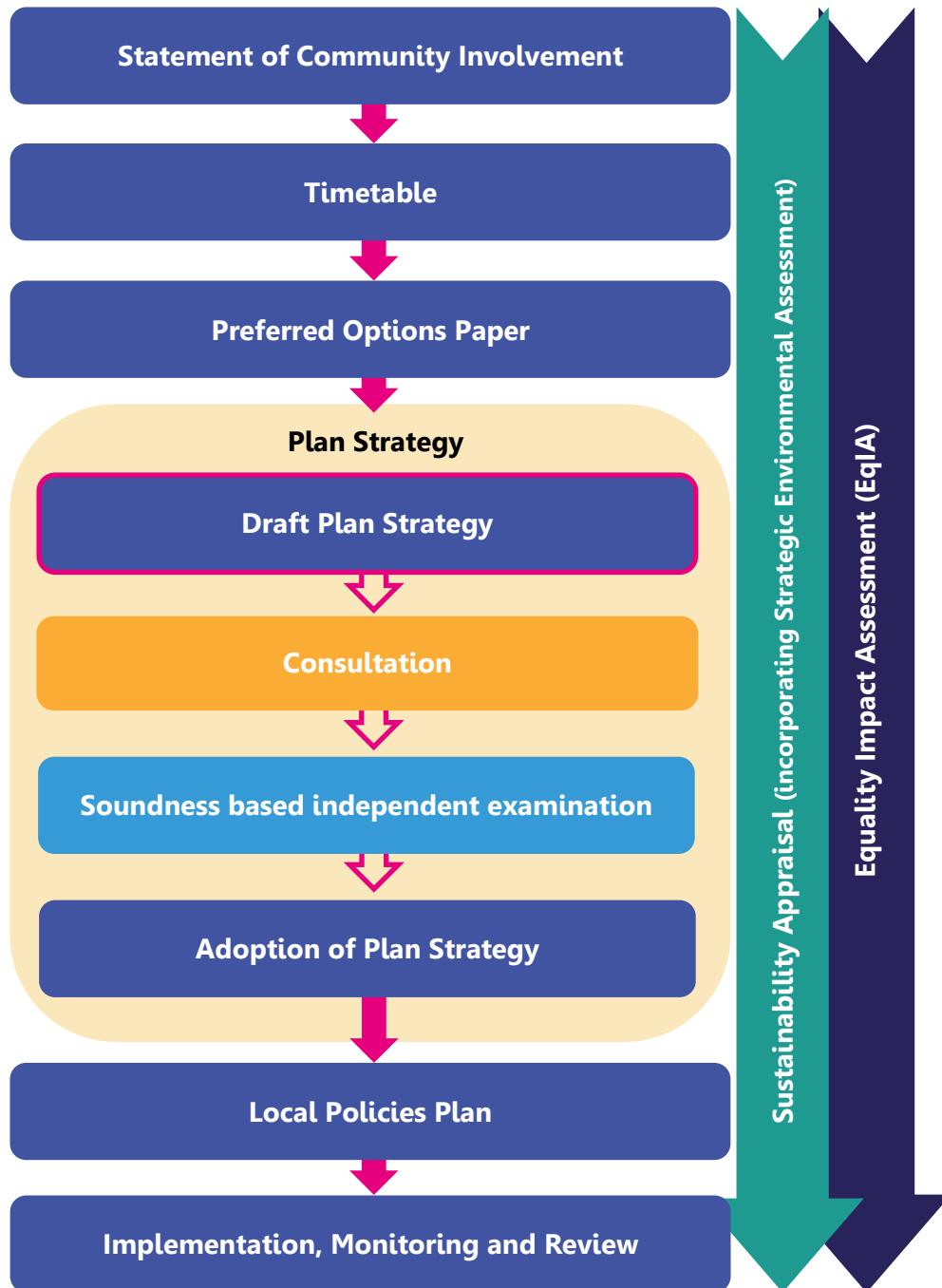


Figure 1: Local Development Plan Preparation Process

## 1.4 The process so far

1.4.1 The council undertook a number of key tasks to inform the preparation and the evidence base for the LDP. This included a series of councillor workshops on various topics and themes, and production of topic papers to identify the current social, economic and environmental characteristics of Belfast. You can view these on our [Local Development Plan webpage](#), or by searching for Belfast City Council Local Development Plan.

1.4.2 The preparation process for the LDP began when the council published its Statement of Community Involvement (SCI) and the LDP timetable in June 2016, which can also be viewed on the same webpage. A summary of the timetable is presented in **Table 1**, which also indicates the relevant SA stages. The current stage of the process is highlighted in blue.

Stage	Local Development Plan	Key Dates	Sustainability Appraisal
1	Publication of Timetable & SCI	May 2016	Scoping Report
	Preferred Options Paper	January 2017	SA Interim Report
2	<b>Draft Plan Strategy</b>	<b>September 2018</b>	<b>SA Report</b>
	Independent Examination	-	n/a
	Adopted Plan Strategy	-	SA Statement
3	Draft Local Policies Plan	-	SA Report
	Independent Examination	-	n/a
	Adopted Local Polices Plan	-	SA Statement
4	Monitoring & Review	Ongoing	n/a

**Table 1: Local Development Plan Timetable (with SA Process)**



## 1.5 Sustainable development

- 1.5.1 The Regional Development Strategy 2035 (RDS) defines sustainable development as '*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*'<sup>2</sup>.
- 1.5.2 The N.I. Executive's Sustainable Development Strategy (May 2010) 'Everyone's Involved' sets out key principles to strengthen social, economic and environmental measures. Applying these to our plan and policy making process ensures we can continue to improve our society and communities, grow our economy, and utilise our natural resources in a more environmentally sustainable way.
- 1.5.3 Section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006 requires councils to carry out their functions in the best way possible to contribute to the achievement of sustainable development<sup>3</sup>. Section 5 of the Planning Act (Northern Ireland) 2011 reinforces this duty by requiring us to do so with the objective of furthering sustainable development<sup>4</sup>.
- 1.5.4 It is therefore important that sustainable development principles are fully integrated into the LDP preparation process, and as such we have made sure they have been incorporated within the heart of the Draft Plan Strategy appraisal.

## 1.6 Other assessments relevant to the Local Development Plan

### Habitats Regulation Assessment

- 1.6.1 Regulation 43 of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), requires an appropriate assessment to be undertaken of plans and projects which are likely to have a significant effect on a European site in Northern Ireland, either alone or in

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<sup>2</sup> [Regional Development Strategy 2035](#)

<sup>3</sup> [Northern Ireland \(Miscellaneous Provisions\) Act 2006](#)

<sup>4</sup> [Planning Act \(Northern Ireland\) 2011](#)

combination with other plans or projects. This is known as Habitats Regulations Assessment (HRA) and provides for assessment of the implications of a land use plan for European sites in view of their conservation objectives. European sites are defined in the Habitats Regulations as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Ramsar sites are also considered as a matter of policy and included in the term 'European sites'.

- 1.6.2 The nature of the Draft Plan Strategy is that it has potential to have a significant effect on some European sites therefore we are undertaking a HRA in our role as a competent authority. Shared Environmental Service (SES) in Mid and East Antrim Borough Council provides support to Belfast City Council on HRAs for plans and projects. SES has therefore, in conjunction with the council, prepared a draft HRA for the Draft Plan Strategy to ensure the legal requirements of the Regulations are fully met. The HRA will be finalised following public consultation and independent examination of the Draft Plan Strategy and published alongside the adopted Plan Strategy. Regulation 43 (4) of the Habitats Regulations allows for the competent authority to obtain the opinion of the general public on the HRA if it considers it appropriate and therefore comments are also invited on the HRA.

### **Health Assessment**

- 1.6.3 The first of the core principles in Northern Ireland's two-tier planning system is 'improving health and wellbeing'. The Strategic Planning Policy Statement (SPPS) for Northern Ireland states that the planning system has *'an active role to play in helping better the lives of people and communities in Northern Ireland and supporting the Executive's key priority of improving health and wellbeing'*<sup>5</sup>. The LDP can influence policies to improve health and wellbeing, for example ensuring there is sustainable access to green and open spaces, and considering the need for adequate public amenity space within all residential developments.

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<sup>5</sup> [SPPS 2015 DOE \(pp.15\)](#)

- 1.6.4 Whilst a Health Impact Assessment (HIA) is not a formal requirement of the LDP, provision for health and wellbeing is identified and examined within the 'social' aspect of the SA and is a key theme within both the Plan Strategy and Local Policies Plan.

### **Equality Impact Assessment**

- 1.6.5 Section 75 of the Northern Ireland Act 1998, Equality of Opportunity, places a statutory requirement on councils to promote equality of opportunity<sup>6</sup>. This applies to persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; between men and women generally; between persons with a disability and persons without; and between persons with dependents and persons without. The council must also recognise and consider the need to promote good relations between persons of different religious belief, political opinion or racial group.
- 1.6.6 We are required to ensure that the LDP is prepared in accordance with the Section 75 statutory obligations. As a result, we have undertaken an Equality Impact Assessment (EQIA) to determine if the policies and proposals in the LDP will have any potential impacts on Section 75 groups.

### **Rural Proofing**

- 1.6.7 The Rural Needs Act (Northern Ireland) 2016 requires the council to consider rural needs when preparing and implementing policies, plans or programmes. Rural proofing is the process where any major policy and strategy is assessed to determine whether it will have an impact on rural areas, and where appropriate, adjustments should be made in the LDP to take account of particular rural circumstances. We are required to inform the Department for Agriculture, Environment and Rural Affairs (DAERA) on how this duty has been fulfilled on an annual basis.

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<sup>6</sup> [Section 75 of the Northern Ireland Act 1998](#)

- 1.6.8 We have fully incorporated rural proofing within the SA to ensure rural areas are properly considered as part of the LDP preparation, in line with the DAERA guidance note 'Thinking Rural – a Guide to Rural Proofing'<sup>7</sup>. A Rural Needs Impact Assessment on the Draft Plan Strategy has also been completed and is published alongside all the LDP documents.

#### **Links to other assessments**

- 1.6.9 You can find links to all assessments relevant to the LDP on our [Local Development Plan webpage](http://www.belfastcity.gov.uk/ldp) ([www.belfastcity.gov.uk/ldp](http://www.belfastcity.gov.uk/ldp)).

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<sup>7</sup> [Thinking Rural – a Guide to Rural Proofing](#)

## 2 BACKGROUND & APPRAISAL METHODOLOGY

This chapter provides an overview of the strategic aspirations and objectives of the LDP, and the purpose of the SA. This includes the approach and appraisal methodology we have adopted, and the relevant consultation procedures.

### 2.1 The Belfast Local Development Plan 2035

#### LDP Vision

- 2.1.1 The LDP is guided by a vision which provides the overall context for delivering sustainable development up to 2035. This is reproduced in **LDP Box 2** below.

#### LDP Box 2: Our Vision

**In 2035, Belfast will be a globally successful, smart regional city that is environmentally resilient with a vibrant economic and social heart. As a centre of learning and business, the knowledge economy flourishes where collaboration and innovation attracts investment, talent and jobs. We will value and conserve our unique natural and built heritage to enhance and develop tourism.**

**Thriving socially inclusive well-connected neighbourhoods, that encourage a healthy active lifestyle with well-designed homes where people love to live. A strong, inclusive local economy will support progressive, safe and vibrant communities. The city will provide a gateway to opportunities locally, nationally and worldwide.**

## LDP strategic aims and objectives

2.1.2 The council has identified a number of strategic aims and objectives that we believe can help fulfil this vision, as shown in **Figure 2**.



Figure 2: LDP Strategic Aims

2.1.3 The growth of Belfast has been established as an overarching, high level aspiration which echoes regional planning policy objectives and the council’s community plan, ‘The Belfast Agenda’. Supporting sustainable and economic growth is a fundamental basis of the LDP’s overall strategy and therefore sits above the main strategic aims, as shown in **Table 2**.

LDP Key Aspiration		
<b>Growth Aspiration</b>	<b>How will we grow Belfast?</b>	
LDP Strategic Aims		
<b>Strategic Aim 1</b>	<b>Shaping a liveable place</b>	
<b>Strategic Aim 2</b>	<b>Creating a vibrant economy</b>	
<b>Strategic Aim 3</b>	<b>Building a smart connected and resilient place</b>	
<b>Strategic Aim 4</b>	<b>Promoting a green and active place</b>	

**Table 2: LDP Key Aspiration & Strategic Aims**

2.1.4 To help us understand how the LDP can deliver each of these aims, 21 strategic objectives have been identified to directly address key issues and shape future development. These are shown in **Figure 3** for reference.

## Shaping a liveable place: Objectives 1 – 7



To grow the population of Belfast and connect with other cities across the UK and Ireland in supporting a greater level of inward investment.



To address current and future residential needs through ensuring the supply of suitable land to meet future requirements for new socially inclusive residential development where there is an appropriate type, size, density, tenure and mix to suit all needs of the population.



To promote sustainable urbanism to deliver high quality design by including policies to protect and enhance the built environment that fosters local distinctiveness.



To improve community safety and reduce the potential for antisocial behaviour or crime through an approach to new development focused on design quality.



To improve safe access for all groups in society to public services through the design and location of new development.



To protect, conserve, and enhance the historic environment through effective management of proposed development and ensuring high quality design.



To promote collaborative cross-community projects that utilise derelict interface sites, that contribute to the integration of neighbourhoods and the development of shared spaces to build social cohesion.

## Creating a vibrant economy: Objectives 8 – 11



To maintain a strong and growing economy by ensuring a range of suitable sites for employment uses are available and able to be developed to meet the future growth of the economy and employment.



To support local economies by promoting development of suitable land and buildings to provide sustainable access to retail, leisure, culture, office and commercial uses within the city centre and district centres, ensuring the future needs are addressed and their continued vibrancy and viability maintained.



To strengthen the potential of local tourism to appeal to a wide range of visitors, and the development of suitable tourism infrastructure, including overnight accommodation, leisure and cultural facilities for this important sector of the economy.



To support the continued regeneration of disadvantaged areas, to facilitate well linked high-quality mixed developments, designed to create diverse communities, to break down the social and sectarian divisions of existing city neighbourhoods.



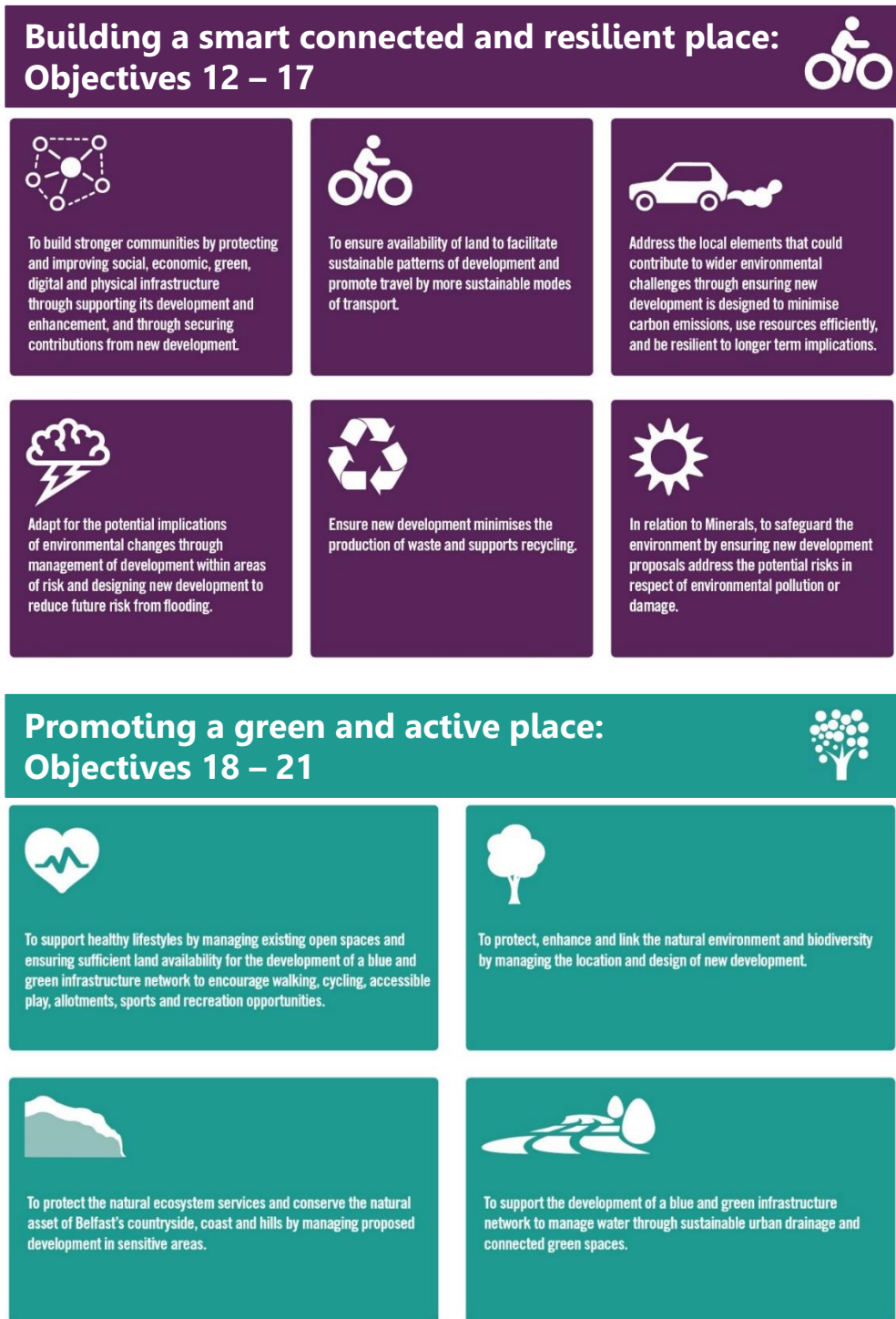


Figure 3: LDP Strategic Objectives

## 2.2 Integrated Sustainability Appraisal

2.2.1 The Draft Plan Strategy is subject to the following assessments:

- **Strategic Environmental Assessment**
- **Sustainability Appraisal**

2.2.2 Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. Both processes are discussed in more detail below.

### Strategic Environmental Assessment

2.2.3 SEA aims to provide a high level of environmental protection, with a view to promoting sustainable development. It is a systematic process for evaluating the environmental consequences of proposed plans or programmes, to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of plan preparation and decision making. Introduced to the UK through EU Directive 2001/42/EC<sup>8</sup>, SEA was transposed into Northern Ireland law by the 'Environmental Assessment of Plans and Programmes Regulations (NI) 2004 (EAPP)<sup>9</sup>, and is referred to in this report as the 'SEA Directive'. The main output of SEA is the production of an Environmental Report.

### Sustainability Appraisal

2.2.4 SA is wider in scope, and is essentially a tool for appraising the social, economic and environmental effects of development plans and programmes, again with the view of promoting sustainable development.

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<sup>8</sup> [SEA Directive 2001/42/EC](#)

<sup>9</sup> [EAPP 2004](#)

It is a statutory requirement under Sections 8(6) and 9(7) of the Planning Act (Northern Ireland) 2011. The key aims and principles of SA are to:

- Make the LDP more sustainable and more responsive to its social, economic and environmental effects,
- Identify key issues, significant impacts and ways to minimise any negative effects,
- Eliminate or 'scope out' insignificant effects,
- Influence the alternatives and mitigation measures we have assessed,
- Provide an early and effective opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process; and
- Document the LDP story – why is it proposed the way it is.

2.2.5 SPPS shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, with the production of a single SA report that incorporates the SEA requirements. By adopting this approach, the council can efficiently carry out a single integrated appraisal without duplicating information. It also ensures that the assessment complies with both sets of regulations by amalgamating the Environmental Report, required by the SEA Directive, within the wider appraisal.

2.2.6 We are committed to undertaking an integrated SA of both the Draft Plan Strategy and the Local Polices Plan, and as noted previously all reference to SA in this report denotes SA that fully incorporates the SEA requirements.

## **2.3 The Sustainability Appraisal Report**

2.3.1 This report has been produced to accompany consultation on the Draft Plan Strategy. It documents the appraisal process carried out to date; showing how the council has assessed reasonable alternatives and any likely significant effects they may have if the LDP is implemented. It clarifies how these have been taken into account in the decision-making process, and

highlights any changes to policies, proposals and mitigation measures that have been made as a result of the SA.

- 2.3.2 As the SA Report aims to provide transparency by documenting the plan-preparation process, it includes an **Audit-Trail** of policy thinking and development; presented in **Appendix 13**.
- 2.3.3 The **Non-Technical Summary** at the beginning of this report provides a more succinct summary and presentation of findings to assist and facilitate the consultation process.
- 2.3.4 The **Scoping Report** sits alongside the SA Report, and identifies the current evidence base, framework, objectives and consultation procedures. It is updated and produced at each stage of the process.
- 2.3.5 Whilst monitoring is not required until implementation of the plan, a description of monitoring measures that meet the SEA Directive requirements is provided in Section 6.

## **2.4 Compliance with the SEA Directive and regulations**

- 2.4.1 As this is an integrated SA appraisal it must meet the SEA Directive requirements for production of an Environmental Report. In line with these the council has prepared this report in full accordance with SEA Directive **Articles 5, 6 & 7** in terms of level of information and consultation measures. The subsequent adoption and monitoring stages of the SA process will be carried out in direct accordance with **Articles 9 & 10**.
- 2.4.2 **Table 3** shows where the relevant requirements under **Article 5 (1) (Annex 1)**<sup>10</sup> are integrated within this report.

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<sup>10</sup> [SEA Directive 2001/42/EC, Article 5 & Annex 1](#)

Ref	SEA Directive Requirements	Location
	Identify, describe and evaluate: <ul style="list-style-type: none"> <li>Likely significant effects on the environment of implementing the plan or programme, and</li> <li>Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme</li> </ul>	SA Report & Non-technical Summary
a)	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Contents Section 1 Section 2
b)	The relevant aspects of the current state of the environment and likely evolution thereof without implementation of the plan or programme	Section 3 Appendices 4-6
c)	The environmental characteristics of areas likely to be significantly affected	
d)	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	
e)	The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	
f)	The likely significant effects on the environment, including; biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural & archaeological heritage, landscape & the interrelationship between the above factors ( <i>includes secondary, cumulative, synergistic, short, medium &amp; long-term permanent &amp; temporary, positive &amp; negative effects</i> )	Section 4 Section 5 Appendices 7-12
g)	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	
h)	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	
i)	A description of measures envisaged concerning monitoring in accordance with Art. 10	Section 6
j)	A non-technical summary of the information provided under the above headings	Non-technical Summary

**Table 3: Meeting the requirements of the SEA Directive – Article 5(1) / Annex 1**

## 2.5 Stages of the Sustainability Appraisal

- 2.5.1 The Northern Ireland Development Plan Practice Note 04 (DPPN) provides councils with direct guidance on the SA process, and the preparation and production of SA reports<sup>11</sup>.
- 2.5.2 The SA is fully integrated into the wider LDP process; informing each stage where decisions are made and identifying arrangements to monitor the plan's implementation. **Appendix 3** highlights the key links between the SA stages and the wider the LDP plan-making process.
- 2.5.3 In addition, **Table 4** provides a summary of the specific SA procedural steps as set out in DPPN. The current stages are highlighted in blue, whilst the second column signposts where information on each stage can be found in this document. **Sections 6** and **7** of this report discuss the next steps for the SA process.

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<sup>11</sup> [Development Plan Practice Note 04](#)

SA Stage		Location
<b>A(1) SA Scoping Report</b>		
1	Identify other relevant policies, plans, programmes & sustainability objectives	Section 3 Appendices 4-6
2	Preparation of the evidence base	
3	Identify existing environmental issues and challenges	
4	Establishing the SA Framework and objectives	
5	Consultation	
<b>A(2) SA Interim Report</b>		
1	Assessment of preferred options and reasonable alternatives	Section 4 Appendices 7-9
2	Consultation alongside Preferred Options Paper and SA Scoping Report	
<b>B Assessment</b>		
1	Test the LDP objectives against the SA Framework	Section 5 Appendices 10-12
2	Assessment of reasonable alternatives	
3	Assessment of likely evolution without the LDP	
4	Evaluate likely significant effects of the draft plan and alternatives	
5	Proposed mitigation measures for addressing adverse / beneficial effects	
<b>C SA Report</b>		
1	Documents appraisal process, findings, including SEA Directive requirements	This report
<b>D Consultation on the SA Report &amp; Draft Plan Strategy</b>		
1	Consult public, environmental authorities and any affected EU member state	August 2018
<b>E SA Statement</b>		
1	Identify how the SA & consultations have been taken into account	-
2	Reasons for choosing the plan as adopted	-
3	Proposed monitoring measures	-
<b>F Monitoring</b>		
1	Establish arrangements to monitor significant effects of plan implementation	-
2	Identify unforeseen adverse effects	-
3	Undertake appropriate remedial action	-

**Table 4: Sustainability Appraisal Stages & Location of Details**

## 2.6 Assessment methodology

2.6.1 As shown in DPPN, the SA of the Draft Plan Strategy represents **stages B** and **C** of the process, whereby the council appraises the following:

- LDP objectives,
- Draft plan policies & reasonable alternatives,
- Likely evolution without the LDP,
- Likely significant effects of the draft plan & reasonable alternatives; and
- Proposed mitigation measures for alleviating adverse & maximising beneficial effects.

### Reasonable alternatives

2.6.2 Reasonable alternatives are the options available to the council that could realistically deliver the LDP aims and objectives. It is a specific requirement of DPPN that alternatives are appraised at each stage to help us identify our preferred options and to understand the likely situation that could occur if the LDP was not adopted. This allows the SA to inform the decision-making process, and to provide a sound evidence base and transparency. It also directly incorporates the SEA Directive requirements for the Environmental Report, which state that the appraisal should consider '*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*' and give '*an outline of the reasons for selecting the alternatives dealt with*<sup>12</sup> (Article 5.1 and Annex I (h)). In summary, the integrated appraisal should identify:

- What reasonable alternatives have been identified and on what basis,
- How they have been assessed and compared; and
- What are the preferred options; and why they are preferred over other alternatives.

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<sup>12</sup> [SEA Directive 2001/42/EC, Article 5.1 and Annex I \(h\)](#)



### **Assessing likely significant effects**

- 2.6.3 Within these parameters the SA can assess whether or not implementation of the LDP is likely to have significant effects on the objectives of the SA framework. **Annex II** of the SEA Directive provides criteria upon which to identify and assess effects<sup>13</sup>, and these are broken down for clarity in **Table 5**.

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<sup>13</sup> [SEA Directive 2001/42/EC, Annex II](#)

SEA Assessment Criteria	Breakdown & Description	
A description & probability of predicted effect (based on available evidence)	Low	0 – 40%: Not likely to have an effect
	Medium	40 – 80%
	High	80%+: Highly likely to have an effect
Effect duration	Short term	0 – 5 years
	Medium term	5 – 15 years (e.g., up to end of plan period)
	Long term	15+ years (e.g. beyond end of plan period)
Effect frequency	Continual; defined by number of occurrences; or intermittent	
Effect reversibility	Whether the effect can be reversed (i.e., can the receptor return to baseline condition) without significant intervention	
Cumulative nature of effect	Where several options each have insignificant effects but together have a significant or combined effect	
Transboundary nature of effect	Whether the plan will have significant effects on another EU state	
Potential for risk to human health or the environment	Whether the impact of the effect would present a risk for people and the environment	
Effect scale & magnitude	High	80%+ of receptor or capacity affected
	Medium	40-80% of receptor or capacity affected
	Low	20-40% of receptor or capacity affected
Spatial extent of effect	Local	Effects contained to the plan area
	Regional	Effects on the wider area
	National / Transboundary	Effects on Northern Ireland or Ireland
	International	Effects extending to the UK or beyond
Value & vulnerability of area likely to be affected	Impact of the effect on the value or condition of the existing area	
Potential effects on recognised status	Impact on areas with national, community or international protection	
Whether mitigation is required/possible	If the effect is adverse, should the council ensure mitigation measures are put in place to prevent, reduce or offset adverse effects, or to enhance positive effects	
Suggestions for mitigating effect	What measures the council can implement to effectively mitigate the effect	

**Table 5: SEA Assessment Criteria Descriptions**

## Assessment scoring and effect significance

2.6.4 The appraisal is carried out by scoring each option and reasonable alternative against the objectives in the SA framework, using the colour coding shown below. Results are recorded in detailed assessment matrices, with accompanying summary tables. The summary tables provide a written documentary of the key findings and clarify the preferred option; the reasons why it was chosen; and why others were rejected.

--	-	?	+/-	0	+	++
Significant Negative	Minor Negative	Unknown Effect	Mixed Effects	No Effect or Relationship	Minor Positive	Significant Positive

Figure 4: Assessment Scoring – Symbols & Colour Coding

2.6.5 Scoring is relative to the scale of proposals under consideration and is determined by the significance of the effect. In order to determine significance, it is important to identify and differentiate between the levels of impact. To do so we consider the SEA criteria noted previously in **Table 6** together with a number of other influencing factors:

- The **magnitude** of the plan's effects, including the degree to which the plan sets a framework for projects, the degree to which it influences other plans, and environmental problems relevant to the plan,
- The **sensitivity** of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes; and
- The **effect characteristics**, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

2.6.6 For example, where either (++) or (--) has been used, this denotes an impact that is considered likely to have a significantly noticeable and

measurable effect, taking into account other factors that may influence the ability to achieve that objective. This ensures they are distinguishable from more minor effects (+ or -).

### Total effects

2.6.7 Totals scores are calculated within the various matrices by attributing each individual effect with a corresponding score using the formula below. This allows the total scores, either against a single policy, theme, or SA Objective to be calculated.

<b>--</b>	<b>-</b>	<b>?</b>	<b>+/-</b>	<b>0</b>	<b>+</b>	<b>++</b>
Significant Negative	Minor Negative	Unknown Effect	Mixed Effects	No Effect or Relationship	Minor Positive	Significant Positive
-2	-1	0	0	0	1	2

**Figure 5: Assessment Scoring – Symbols, Colour Coding & Scoring Weight**

### Cumulative effects

2.6.8 Whilst total effects represent the sum of each individual effect, we must also recognise that when an effect interacts or combines with other effects or actions, the overall impact may actually be much greater than the initial, total sum. These are known as cumulative effects, where the focus is not just on the number of policy options with a particular score, but the level of influence of those policy options. Actions which may interact can include the effects of other options, plans, projects and underlying trends, and where cumulative effects are envisaged; additional mitigation measures may be required. As such our SA of the Draft Plan Strategy not only appraises the total effects but also the potential for cumulative effects. This incorporates a number of effect typologies, including the following:

- **Indirect effects:** secondary effects which result from a primary activity; for example, the impact of new development which may be introduced following construction or improvements to infrastructure or road networks.
- **Synergistic effects:** where effects arise due to two or more processes interacting together, producing an effect that is greater than the cumulative effect of those processes.
- **Nibbling:** incremental or decreasing effects, such as the gradual loss of natural areas e.g., woodlands or greenbelt through otherwise discreet development.

## Mitigation

2.6.9 Where significant adverse effects are predicted, measures can be identified that could avoid, reduce, or offset these (as fully as possible). This can include mitigation that may be provided by other policies in the LDP. Where significant positive effects are noted, potential enhancement measures may also be highlighted.

2.6.10 The purpose of mitigation is not necessarily to turn negative effects into positive, but as noted to avoid, reduce or offset the significant negative effects. Mitigation measures should be deliverable and effective, and are considered as a hierarchy; with avoidance better than reduction which in turn is better than offsetting:

**Avoid completely:** *e.g., locate housing away from ecologically sensitive areas*



**Reduce or minimise:** *e.g., provide buffer zone between housing and sensitive areas*



**Offset:** *e.g., build on sensitive areas but provide replacement planting nearby*

2.6.11 If we effectively determine the level of significance, we can identify if measures to either mitigate or enhance the potential effects are needed. This is done by applying the following methodology in **Table 6**.

Scoring Symbol	Predicted Effect	Suggested Mitigation
++	<b>Significant positive:</b> This option would significantly help in achieving the objective	Consider potential to further enhance significant positive effect
+	<b>Minor positive:</b> This option would help in achieving the objective	Consider potential to further enhance positive effect
0	<b>Neutral effect:</b> This option would neither help nor hinder achievement of the objective	Option likely to be acceptable. Consider whether potential intervention could result in positive effects
+/-	<b>Mixed:</b> Effect depends on how the option is implemented	Suggestions for implementation
?	<b>Uncertain:</b> More information required	Consider what stage this information will be available, from whom, and how it could be actioned
-	<b>Minor negative:</b> This option would conflict with the objective	Consider potential mitigation measures to prevent/reduce/offset effect, or reconsider option/alternatives
--	<b>Significant negative:</b> This option would significantly conflict with the objective	Consider significant mitigation measures to prevent/reduce/offset severity of effect, or reconsider option/alternatives

**Table 6: Effect Significance & Mitigation**

## 2.7 Limitations and difficulties encountered

- 2.7.1 It is a further requirement of the SEA Directive that we take account of any data limitations or other difficulties encountered during the process<sup>14</sup>.
- 2.7.2 Within a process of this nature it is acknowledged that there a number of limitations. In particular, these can derive predominantly from the strategic, high nature of an assessment at plan level. In addition, whilst there are operational policies in the Draft Plan Strategy, some of which relate to designated areas, they are, in the main, not site-specific and are intended to apply across the entire area. As a result, assessment conclusions will often not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties.
- 2.7.3 Furthermore there may also be an expectation that the LDP contains specific policies for an area that actually falls under the direct remit of another statutory authority. For example, whilst the LDP seeks to promote sustainable travel infrastructure and behavioural change; the Department for Infrastructure (Dfi) is the statutory authority responsibility for developing strategic planning, transport policy and delivering infrastructure projects. In response, the LDP recognises that a coordinated approach is required between the council and Dfi, as well as neighbouring authorities across the sub region, to deliver the overall transportation vision. The plan will facilitate future transport initiatives for the city, and a key element throughout the plan is to ensure the integration of land use and transportation planning.
- 2.7.4 Finally, as the Draft Plan Strategy is strategic in nature, this made it difficult at times to identify alternatives and their effects, as these may remain uncertain until detailed supplementary planning guidance and specific site proposals are known. Specific difficulties encountered throughout each

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<sup>14</sup> [SEA Directive 2001/42/EC, Annex I \(h\)](#)

stage of the assessment are noted in each subsequent section of this report.

## **2.8 Consultation on the Sustainability Appraisal**

- 2.8.1 Consultation and public participation are an important part of the SA process. All consultation must be carried out in line with the SEA Directive, the Planning Act (Northern Ireland) 2011 procedures for SA, and the LDP Regulations.
- 2.8.2 Under the SEA Directive the council must consult with the 'Consultation Body' at specific stages during preparation of the LDP. In Northern Ireland this function is delivered by the Department of Agriculture Environment and Rural Affairs (DAERA), led by the Northern Ireland Environment Agency (NIEA). Other bodies such as Historic Environment Division (HED) and the public are also consulted on all sustainability issues within the SA.
- 2.8.3 Accordingly, the council is committed to undertaking consultation at each stage of the process, as shown in **Table 7**, with the current stage again highlighted in blue.



Stage	Description	Consultation Period / Date
1. Screening	Determining if a plan or programme requires a SEA	n/a – plan screened in
2. Scoping	Scoping Report – deciding on scope and level of detail of information to be included.	5 weeks
	Comments received have been fully reflected in the updated Scoping Report, and directly informed the Interim Report & SA Report.	15 November to 20 December 2016
3. Draft Plan	Consultation on the Interim Report and Scoping Report, alongside the Preferred Options Paper.	12 weeks
	Comments received have been fully considered and addressed when preparing the Draft Plan Strategy.	26 January to 20 April 2017
	Preview of Draft Plan Strategy and all supporting documents including SA Report, Non-technical Summary & Scoping Report (4 weeks).	12 weeks
	Formal Consultation on the Draft Plan Strategy and all supporting documents including SA Report, Non-technical Summary & Scoping Report (8 weeks).	23 August to 15 November 2018
	The documents are published on the council’s website, and the Consultation Body have been consulted.	
4. Decision to Adopt	SA Statement – the council will make information available, including a post-adoption statement to show how the SA, and opinions and consultations have been taken into account, the reasons for decisions made and choosing the plan as adopted, and proposed measures to monitor the plan.	

**Table 7: Consultation Stages**

2.8.4 We will welcome comments on the Draft Plan Strategy, SA Report, Scoping Report and supporting documents, including the HRA and EQIA, for a period of **eight weeks** between **20 September** and **15 November 2018**. Prior to this it will also be available for review for a **four-week** period; from **23 August** to **20 September 2018**.

2.8.5 Representations can be submitted by e-mail to [localdevelopmentplan@belfastcity.gov.uk](mailto:localdevelopmentplan@belfastcity.gov.uk), and written submissions should be sent to:

**Belfast Planning Service  
Cecil Ward Building  
4-10 Linenhall Street  
BELFAST  
BT2 8BP  
02890 500510**

2.8.6 All relevant documents are available to view on our **Local Development Plan webpage**, ([www.belfastcity.gov.uk/ldp](http://www.belfastcity.gov.uk/ldp)), whilst a hard copy is available to view at the above address.

### 3 CONTEXT, BASELINE & SUSTAINABILITY OBJECTIVES

This chapter sets the context for the SA of the Draft Plan Strategy. By assessing relevant policies, plans and programmes together with current baseline data, we are able to identify existing social, economic and environmental conditions and issues. This paves the way for production of a framework of sustainability objectives; against which we can then appraise our policy options and alternatives.

#### Impact Boxes

Throughout this report we have included informative impact boxes, which summarise how each element of the SA has informed and influenced both the preparation of the LDP and appraisal of the Draft Plan Strategy to date.

#### 3.1 Scoping

- 3.1.1 The first phase of the SA was the scoping stage, during which the council produced a formal Scoping Report. Scoping is the process of deciding the scope and level of detail for the SA, including the environmental and sustainability effects to be considered, the assessment methods to be used, and the structure and contents of this subsequent SA Report.
- 3.1.2 The requirement of the Scoping Report is to set the criteria for assessment by bringing together baseline data and other relevant information, such as a review of up-to-date policies, programmes and plans.
- 3.1.3 The Scoping Report was first published for consultation for a period of 5 weeks from 15 November to 20 December 2016. It was again published alongside the Preferred Options Paper and Interim SA Report for a period of 12 weeks from 26 January to 20 April 2017. Following both consultation

processes the report was updated to reflect all comments received in response. Both the current Scoping Report and this SA Report fully reflect this updated information.

### Box 1: Impact of SCOPING

Scoping focusses on the key issues that the LDP should address or potentially affect:

- ✓ Identifies other relevant policies, plans and programmes;
- ✓ Presents current baseline information;
- ✓ Identifies sustainability objectives, opportunities and challenges;
- ✓ Assesses the likely evolution of existing conditions without the LDP; and
- ✓ Establishes the SA Framework.

## 3.2 Plan, policy and programme review

3.2.1 The LDP may be influenced in various ways by other plans, policies or programmes (PPPs), or by external sustainability objectives such as those put forward in other strategies or initiatives. The SEA Directive requires a review of relevant PPP's so that we can determine how the LDP is affected by these, how it may affect them, and to address any inconsistencies and constraints.

3.2.2 The review of key PPP's and strategies that are likely to be relevant to the LDP was first presented in the Scoping Report and SA Interim Report. This allowed the council to establish a coherent policy context for the SA and to ensure the emerging LDP reflects and complies with international, national and local policies. The review has now been updated following consultation on both reports, whilst future versions will reflect any new relevant policies which are published between now and the next stage of the process.

3.2.3 The review identifies the key objectives and requirements of each PPP, together with any specific sustainability implications for the LDP. A high-level summary is set out in **Table 8**, focussing on some of the key examples at each level, what those documents say that the LDP should or must do, and how the review has directly influenced both the LDP and SA. A full detailed list of all PPPs relevant to the Belfast LDP is presented in **Appendix 4**.

#### Box 2: Impact of PPP REVIEW

The review plays a crucial role in the preparation of the LDP and undertaking the SA:

- ▶ By assessing the objectives and requirements of each PPP, we are able to identify important issues or regulations that the LDP must take account of, either through strategic aims and aspirations or specific policies.
- ▶ Likewise for the SA, identifying current issues and areas of concerns allows us to include relevant, related objectives within the SA Framework. LDP policy options and alternatives can then be appraised against these objectives, to understand to what level or extent they can address the issues or areas of concern.

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
<b>INTERNATIONAL &amp; EUROPEAN LEVEL</b>		
SEA Directive	Provide for high level of environmental protection and integrate environmental considerations into the preparation and adoption of LDP with a view of promoting sustainable development.	The SEA Directive must be applied to the preparation of the LDP. Specific requirements of the Directive must also be met through the SA.
Habitats Directive	Promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements; conservation of natural habitats; and maintain landscape features of importance of wildlife and fauna.	The LDP should take account of the Habitats Directive. Specific SA objectives should be included to protect and maintain the natural environment and important habitats.
Europe 2020 Strategy	The European Union's 10-year jobs and growth strategy; launched in 2010 to create the conditions for smart, sustainable and inclusive growth. Includes 5 headline targets for the EU to achieve by 2020.	The council should take account of the 5 headline targets when preparing the LDP.
<b>NATIONAL LEVEL</b>		
The Planning Act (Northern Ireland) 2011	Formulation and co-ordination of policy securing the orderly and consistent development of land, and the planning of the development.	The LDP must adhere to the legislation set out by the Planning Act.
Regional Development Strategy 2035 (RDS)	Aims to take account of the economic ambitions and needs of the region, and put in place spatial planning, transport and housing priorities that will support and meet the aspirations of the region.	The LDP should take into consideration and reflect the relevant policies contained within the RDS.
Strategic Planning Policy Statement (SPPS)	Sets out the Department's regional planning policies for securing the orderly and consistent development of land.	The provisions and core principles of the SPPS must be taken into account and reflected in the preparation of the LDP.
N.I. Sustainability Development Strategy	Framework to respond to major threats such as climate change and energy price instability, encouraging integrated action to tackle problems and take advantage of opportunities.	The LDP should take the strategy into consideration by promoting sustainable development whilst identifying and addressing issues and maximising opportunity.

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
<b>LOCAL LEVEL</b>		
<p>Belfast Metropolitan Area Plan 2015</p>	<p>Although formally adopted in 2014, this process of final BMAP adoption was declared unlawful as a result of a judgement in the court of appeal delivered on 18 May 2017. This means the Belfast Urban Area Plan (BUAP) 2001 and the other Development Plans provides the statutory plan context for the area. However, BUAP was published in 1990, nearly 30 years ago. The Belfast City Council Plan Area has undergone massive transformation since then, particularly in the city centre. The formal development plans which apply are dated and silent on many of the planning issues pertinent to needs of current planning decision making. In recognition of this unique circumstance and taking account of the short-term transitional period in advance of the adoption of the Local Policies Plan it is important to provide clarity in relation to the application of planning policy.</p>	<p>Draft BMAP, in its most recent, post-examination form remains a significant material consideration in future planning decisions. It was at the most advanced stage possible prior to formal adoption. Draft BMAP referred to throughout this document therefore refers to that version. However, in preparing this document the council has also had regard to the provisions of the draft BMAP which was published in 2004, the objections which were raised as part of that plan process and the Planning Appeals Commission Inquiry report.</p>
<p>Belfast Agenda</p>	<p>The community plan for Belfast, created in partnership with key city partners, residents and community organisations. The plan sets out medium and long-term goals for social, economic and environmental improvements for Belfast over the next 15 years.</p>	<p>The LDP should provide the spatial reflection of the Community Plan and establish a coherent, joint vision for Belfast that will shape development and growth of the city over the next 15 years. The LDP preparation must therefore take full account of the Community Plan. This is explained below in more detail.</p>
<p>Belfast City Centre Regeneration Investment Strategy</p>	<p>Strategy to ensure maximum economic and social impact.</p>	<p>The LDP should promote the underlying and core principles of the strategy.</p>
<p>Belfast Integrated Tourism Strategy</p>	<p>Aims to achieve the ambition and aspiration to make Belfast a world class, must-visit, city destination.</p>	<p>The LDP should promote Belfast as a tourist destination through its strategies and policies.</p>

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
Belfast Integrated Economic Strategy	Sets out the key strategic aspirations and priorities for Belfast City Council, Invest NI and its partners.	The LDP should enable economic growth and prosperity of the city council area through its strategies and policies.

**Table 8: High Level Plan, Policy & Programme Review**



### 3.3 Links with the Belfast Agenda



3.3.1 There is a statutory obligation for the evolving LDP to take account of Belfast's Community Plan, 'The Belfast Agenda'<sup>15</sup>, which was informed by the 'Belfast Conversation' consultation event in May 2015. This brought key stakeholders together from across the sector to gain a better understanding of the aspirations of residents, community groups and partner organisations, and how they would like to see the city shape and develop over the next 15 years.

3.3.2 The response of participants was overwhelmingly positive, with each workshop generating a wealth of ideas to help shape the Belfast Agenda. There were many recurring themes and ideas which centred around:

- Enhancing the city's public transport infrastructure,
- The need for greater co-ordination and support for the economy, skills and employability,
- Addressing issues of community relations, social and health inequalities,
- Making the most of our physically compact city and enhancing the strong links to our surrounding natural environment,
- Maximising the benefits of our built environment, protecting the local distinctiveness of our built heritage whilst allowing for high quality innovative development; and
- Stronger civic participation and engagement and finding ways to support greater individual fulfilment and self-empowerment.

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<sup>15</sup> [The Belfast Agenda](#)

- 3.3.3 Alongside the power of Community Planning, the council has an opportunity to tailor fit a joined-up approach with other functions such as regeneration and economic development. Working directly with key statutory agencies, the council will develop a joint vision for Belfast outlining how we will work with statutory, business and community partners to shape future development and growth, by setting medium and long-term goals for social, economic and environmental improvements over the next 15 years.
- 3.3.4 These principles shall be integrated and reflected directly within the LDP, to enable the planning system to move away from a land-use focus, towards a place-shaping approach which incorporates a spatial analysis and visioning process. In this respect, the LDP shall essentially present a spatial reflection of the Belfast Agenda.

### **3.4 Baseline information**

- 3.4.1 The collection of baseline information is a fundamental, necessary requirement of the SA process and covers a wide range of interconnecting, pertinent sustainability topics. Its purpose is to identify an evidence base of existing conditions and issues in the area, against which the plan's effects can be assessed and monitored. With a focus on what the plan can deliver, it can help us define key opportunities and challenges facing Belfast.
- 3.4.2 The information incorporates the key themes shown below in **Figure 6** which could impact sustainability as a result of adopting and implementing the LDP. These include the environmental receptors derived from Annex I (f) of the SEA Directive and their inter-relationship, whilst social and economic themes are identified for the purpose of the integrated SA process.

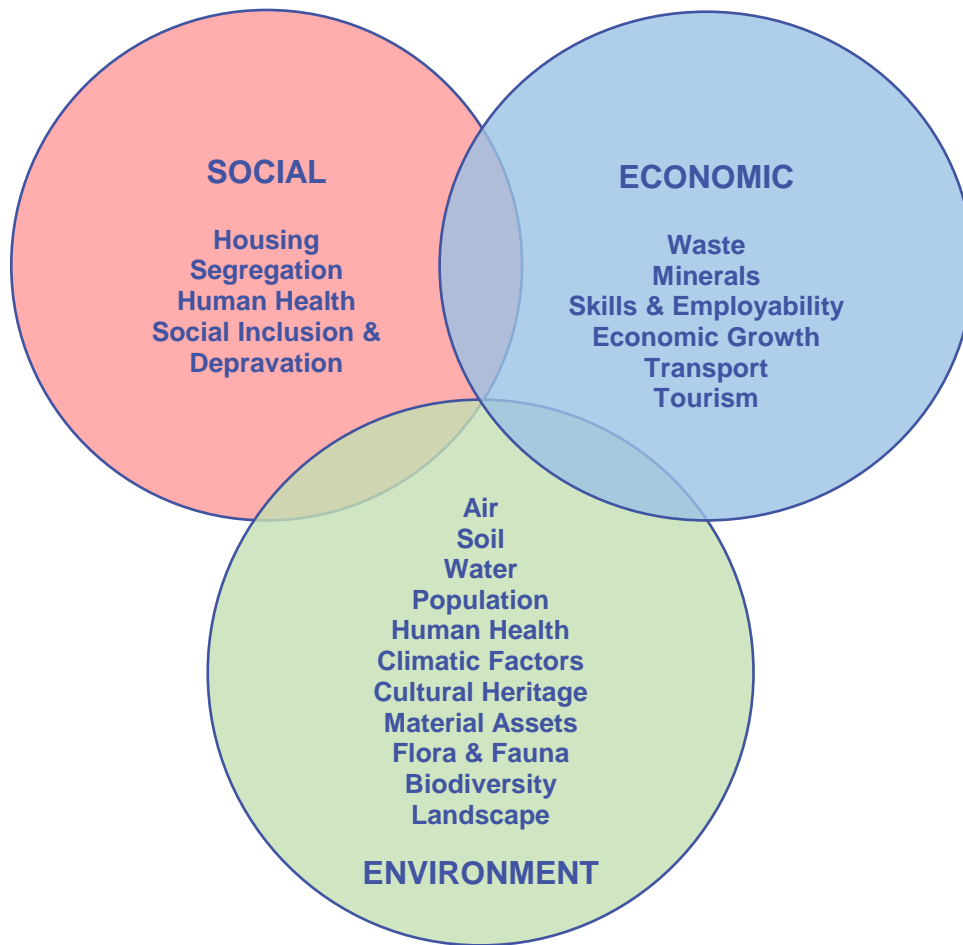


Figure 6: Belfast LDP Baseline Data Topics

3.4.3 In addition to establishing the existing conditions within Belfast, the baseline data also allows us to predict and understand how each issue is likely to evolve if the LDP was not implemented. It establishes a solid evidence base, from which we can identify trends, predict likely effects and monitoring outcomes, and it can not only indicate the current situation, but how far it is from reaching any established targets or thresholds.

3.4.4 A full presentation of baseline information can be found in **Appendix 5**. The data was collected from a wide range of sources including external studies, assessments and higher-level plans, and is presented through a combination of tables, text and maps to provide a spatial representation of the information. The information collected reflects data collected from early 2016 to 2018, however the collection of baseline data will go on

indefinitely and will be updated on an ongoing basis. It is noted however that there have been limitations in gathering evidence specific to Belfast, particularly in light of the recent Review of Public Administration. Other evidence only provided trends on a Northern Ireland basis. The information represents the best available data at the time of collection and has been updated to reflect comments received through the previous consultation stages.

### **3.5 Key sustainability issues**

3.5.1 By analysing the baseline information we can identify existing conditions, problems and issues, as required by the SEA Directive. Understanding these current issues gives us the opportunity to respond by developing sustainable plan objectives and options, and to consider how the LDP can avoid exacerbating existing problems or explore alternative solutions.

### **3.6 Likely future without the plan**

3.6.1 It is also a requirement of the SEA Directive that we consider the likely evolution of the environment in the plan area if the LDP was not implemented. This is an important part of the overall SA process, especially for the later consideration of cumulative effects.

3.6.2 If the Belfast LDP is not implemented, it is assumed that the Strategic Planning Policy Statement (SPPS), corresponding Planning Policy Statements (PPS) and supplementary guidance documents would remain, and a number of other key strategies and plans would continue, thus there would not necessarily be a policy vacuum. Nonetheless it is clear from the evidence base that those certain, existing trends could continue or worsen in some areas.

3.6.3 **Table 9** provides a very high-level summary of the key sustainability issues identified from the baseline information, together with how the LDP could

respond. The likely evolution of each issue is then set out separately in **Table 10**.

- 3.6.4 A full, expanded synopsis of all sustainability issues and their influence on the LDP preparation process and the SA is presented in **Appendix 6**. This includes a detailed summary of the likely evolution of each issue if the LDP were not to be adopted.

Themes	Key Sustainability Issues	Implications for LDP
<b>Population &amp; Human Health</b>	Approx. 45% of Belfast’s population live in deprived areas, with life expectancy lower than the N.I. average. Health inequalities are evident, with high deaths rates due to obesity. Segregation via peace walls heavily restricts expansion and connectivity.	The LDP should encourage regeneration to tackle spatially persistent social deprivation & inequality. Deprived communities should be connected to employment opportunities and services, with improved access for all to community & health facilities. Broader government policies aimed at addressing health & wellbeing should be reflected, with a focus on influencing the environment in a way that builds strong, healthy & vibrant communities.
<b>Housing</b>	There is a shortage of social housing schemes to meet demand. Accommodating growth requires suitable and affordable house types, in the right locations, to meet differing needs.	The LDP can play an important role in the delivery of good quality housing tenures, types and spaces to support the creation of more mixed and balanced communities, and sustainable population growth levels and patterns of residential development. Housing affordability should be addressed through consideration of the NIHE Housing Needs Assessment, together with adequate allocation of land to facilitate quality housing to meet the needs of everyone.
<b>Crime</b>	A third of N.I. recorded crime offences in 2014 occurred in Belfast, with higher anti-social behaviour in Belfast than any other council area.	The LDP should enhance the quality of life by encouraging safe and accessible environments, and secure by design standards. Quality of life can also be improved through greater access employment areas and regeneration opportunities.
<b>Open Space</b>	There is a disparity in the provision of open space across Belfast, with low levels of open and green space in the city centre.	The LDP should protect, enhance and make open space accessible for enjoyment of the natural, cultural and industrial environment. Well-designed open space should be created and encouraged, particularly in areas currently lacking provision, along the rivers and waterfront, and by way of seascape links where appropriate. Accessibility of sport, leisure and open space can improve social participation, cohesion and inclusivity, whilst green linkages should be identified and encouraged throughout the city and to the surrounding hills. Developer contributions should be sought via Section 76 to offset impacts caused by

Themes	Key Sustainability Issues	Implications for LDP
		development, by contributing to and creating open space as per land use plans.
<b>Education</b>	The 2011 census outlined that 41% of the adult population have no formal qualifications which decreases chances of employability.	The LDP should ensure that community and educational facilities are in the right locations, accessible and well connected. The relocation of the University of Ulster to the north end of the city centre will be a key area of focus.
<b>Employment</b>	30 <sup>16</sup> % of Belfast’s working age population are economically inactive who are not looking or available for work. Half of these claim benefits.	The LDP can promote connectivity to employment lands, especially in areas of employment deprivation, and recognise the need to sustain a more responsive, flexible and accessible system of higher education, with close consideration and review if the Employment Lands Assessment. Large scale housing development should be planned close to existing education facilities with good infrastructural connectivity.
<b>Tourism</b>	Whilst Belfast has a growing tourism economy, a number of weaknesses could inhibit and hamper economic growth– limited hotel bed space; lower than average overnight trip length and spend per night; and connectivity weaknesses between key points of interest.	The LDP should adopt a city centre approach to new tourist-based accommodation/development and ensure an adequate supply of land for tourism uses especially in the City Centre. Likewise, an integrated transportation approach to land use can improve connectivity and promote sustainable transport and travel patterns. All proposals must seek to retain the city’s built and landscape character.
<b>Transportation</b>	Regional dependency and reliance on private car travel have resulted in road traffic congestion, which has adversely impacted air quality, CO2 emissions and environmental quality. There is a clear need to integrate transportation and land use to maximise development around a quality sustainable transport network.	The LDP should promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.

<sup>16</sup> Labour Force Survey

Themes	Key Sustainability Issues	Implications for LDP
<b>Retail</b>	There are high levels of vacancy rates in Belfast which reduces the retail offer and economic potential of the city centre.	The LDP should ensure a city centre approach and promote compact, sustainable development around anchor store opportunities with good accessibility to all facilities. A robust retail core and frontage and sustainable re-use of vacant lands and buildings should be encouraged, as should the provision of appropriately located mixed-used and office development.
<b>Biodiversity, Flora &amp; Fauna</b>	Belfast has many designated sites protected for their biodiversity and conservation importance. New development, pollution and disturbance could pose a threat to vulnerable biodiversity sites resulting in habitat loss and fragmentation.	The LDP should seek to protect, conserve and enhance natural heritage features, sites and the hierarchy of ecological networks when zoning sites for development through key sites requirements. Sensitive landscapes should be managed and protected from obtrusive development and enhanced where possible. Existing trees and woodlands should be protected, whilst additional green and blue infrastructure can add value to the city's provision and enhancement as well connecting to open space and habitats.
<b>Air Quality</b>	The heavy reliance on vehicular travel leads to road traffic congestion which is having an adverse effect on air quality and CO2 emissions in Belfast.	The LDP should support economic growth whilst reducing the environmental impact of transport. Car reliance and impact on air quality can be reduced by supporting suitably located development that take account of air quality management areas and promoting sustainable transport modes. Tree coverage across the city should be protected and increased.
<b>Water</b>	All water bodies within the River Lagan, tidal Lagan and inner Belfast Lough are currently failing to meet their Water Framework Directive (WFD) objectives, which is being addressed through the Living with Water Programme (LWWP) and the North-East River Basin Management Plan (NE RBMP). However, without major investment in wastewater and sewage infrastructure in Greater Belfast, it may not be possible to permit new connections that will	Provision should be made for wastewater and sewage infrastructure, in particular the requirements for future land supply. The LDP should encourage an increase in green and blue infrastructure and promotion of SUDS use, with full consideration given to the spatial implications and requirements of other statutory plans and urban capacity studies.



Themes	Key Sustainability Issues	Implications for LDP
	<p>impact significantly on an already stretched infrastructure and adversely affect the economic growth strategy for Belfast.</p>	
<p><b>Contaminated Soils</b></p>	<p>Belfast has significant areas of previously developed or brownfield land, with many remaining undeveloped or vacant for extended periods. This highlights the concerns over potential viability for housing, which could hinder the LDP's growth aspirations.</p>	<p>The LDP should identify and prioritise the re-use of existing brownfield sites for development, including previously developed brownfield land outside the city that have potential for economic development use. A precautionary principle should be exercised for sites that may include priority habitats or have special biodiversity interest.</p>
<p><b>Cultural &amp; Built Heritage</b></p>	<p>Belfast has a rich cultural and built heritage, which could potentially come under pressure from new development. Alongside this, some of Belfast's heritage assets are in neglect and decay.</p>	<p>The LDP should protect, conserve &amp; enhance the historic environment, by recognising townscape and landscape character and enabling sympathetic, heritage led development which preserves historic assets and settings. Sensitive and innovative re-use of existing historic building stock, including vacant/derelict buildings should be encouraged and promoted, whilst a tall buildings policy could retain the environmental &amp; cultural character of the city setting.</p> <p>Opportunities should be encouraged to foster community pride and identity through conservation or regeneration of local heritage assets, such as the retention of heritage assets in peace line areas for community use.</p> <p>Furthermore, the LDP should seek to retain, protect and restore heritage assets, which would facilitate maintenance of craft skills and seek the use of traditional materials where appropriate. Developers should be aware of potential areas where archaeological works will be required.</p>
<p><b>Landscape</b></p>	<p>The city's landscape is subject to limited statutory landscape character and countryside designations, which are under increasing</p>	<p>The LDP should seek to protect, conserve and enhance the landscape and townscape character of Belfast, and the opportunity to enhance or restore degraded spaces. All development should take cognisance of character, form, key views and vistas. An Urban Design Guide; high standards of</p>

Themes	Key Sustainability Issues	Implications for LDP
	pressure from development and the intrusion of urbanising elements.	design, maintenance and management; and increased tree and woodland planting should be promoted along with a greater emphasis on protection of existing natural environment.
<b>Waste</b>	Challenges in managing and accounting for all waste stream means the council may not achieve regional landfill obligations, with increasing pressure to deliver recycling targets set by the N.I. Executive and Europe.	The LDP must consider the infrastructure requirements for future land supply together with spatial implications of other statutory plans, such as the council's new Waste Management Plan and its spatial implications. It should ensure appropriate management of waste facilities and promote and support innovative ways to efficiently tackle and manage waste.
<b>Climate Change</b>	Belfast still relies on fossil fuels which contribute to rising greenhouse gas emissions and poor air quality. These are increasing global temperatures, giving rise to more intense rainfalls and sea levels, consequently leading to a significant threat of flooding.	The LDP could encourage and support measures to address climate change by avoiding areas of highest flood risk during site allocations and promoting natural and man-made flood mitigation schemes. Sustainable transport, building design and construction standards, and the protection, enhancement and creation of new green space can all contribute positively to climate change adaption.
<b>Renewable Energy</b>	The lack of renewable energy interventions could pose a risk to energy security in Belfast and make us less competitive in the global market.	The LDP should support the reduction of fossil fuel emissions and actively encourage renewable and low carbon technologies. Implementing a green and blue infrastructure can encourage more sustainable modes of transport whilst increased green infrastructure can absorb and reduce greenhouse gases.

**Table 9: Current Sustainability Issues & Implications**

Themes	Likely Evolution without the LDP
<b>Population &amp; Human Health</b>	<p>The Belfast Agenda identifies health as a priority and could potentially coordinate programmes to address these inequalities, whilst the Department of Communities 'Neighbourhood Renewal' scheme will continue to address deprivation and local issues. Likewise regional and local programmes may seek to address health disparities across the city, however without the LDP and supporting evidence, current trends could continue to worsen, and it would not be possible for the council to fully understand and plan positively for the city's spatial and development needs. In terms of segregation the NI Executive set ambitious targets to reduce and remove all interface barriers by 2023. Without the LDP, an updated evidence base and supporting policy would be absent to assist the removal of barriers to create shared spaces and maximise accessibility of all areas within communities. There would also be a potential lack of collaborated approaches to integrate regeneration of wider neighbourhood environments, and sustainable modes of transport within land use development.</p>
<b>Housing</b>	<p>Without an up-to-date housing policy to accommodate local growth, it may not be possible to meet demand for identified annual housing supply, or satisfy local requirements for housing type, including affordable housing. The location of suitable housing lands may not correlate to clear areas of housing stress, whilst there would be no mechanism to address the demands of population need, including an aging population, to ensure people have the opportunity to live in houses that address particular need.</p>
<b>Crime</b>	<p>Existing policies and community safety initiatives from other statutory providers will continue to provide interventions to reduce crime. SPPS also provides guidance in supporting good design and positive place making. However, without spatial, strategic direction through the LDP, current trends could continue or worsen.</p>
<b>Open Space</b>	<p>SPPS and PPS 8 would still prevail in terms of open space protection, however SPPS requires an Open Space Strategy to be undertaken specifically through the LDP. Without this the uneven distribution of open space may not be adequately addressed, with a significant lack of city centre open space and various other areas throughout the city lacking in accessible, open space.</p>
<b>Education</b>	<p>Other statutory providers will continue to invest in employability and skills of the population through interventions such as the Council's Skills and Employability Framework. However, without the LDP there may be insufficient economic and employment land to provide locations for entrepreneurs or attract inward investment to establish Belfast as the regional economic driver.</p>
<b>Employment</b>	<p>Absence of the LDP could further disadvantage those on lower incomes in terms of access to places of work and local amenities. The LDP could also improve community connections to places of work, and zone suitable land for economic development and regeneration based on the local needs of the area.</p>

Themes	Likely Evolution without the LDP
<b>Tourism</b>	Without the LDP the council would be unable to facilitate sustainable tourism growth to adequately reflect Belfast's unique needs and assets, such as opportunities to exploit the international trend towards city and business tourism; the city's capacity to become a cultural tourism destination; and expansion of water-based tourism along the Lagan and canals.
<b>Transportation</b>	Regional policy such as PPS13 may address this issue to some extent, however the implementation of specific, up-to-date public transport policies would provide more certainty in relation to addressing public transport issues locally. Furthermore, the Belfast Metropolitan Transport Plan is currently being reviewed, and without the LDP it would be harder to implement transport strategies in an integrated way.
<b>Retail</b>	The SPPS and RDS identify the need to enhance the distinctive role of the city centre as the primary retail location in NI, and regional objectives set a town centre first approach to new retail. Without the LDP there could be a reliance of market led development which can take people out of the town centre, whilst high vacancy levels in the city centre would continue which would be detrimental to vitality and viability. The LDP would also provide an integrated framework for regeneration and development, in particular supporting investment through the Belfast City Centre Regeneration Investment Strategy.
<b>Biodiversity, Flora &amp; Fauna</b>	This issue is being addressed to some extent as SPPS and PPS provide some protection, such as PPS2 Natural Heritage, whilst BMAP 2015 provides local designations policy. Likewise, the Belfast Local Biodiversity Action Plan 2007 (LBAP) sets local priorities for action on habitats and species. However, without the LDP sites of nature conservation would be at considerable risk given the current pressures for growth and development within the district. An up-to-date LDP would map and define sites requiring protection from obtrusive development, along with guidance on siting, scale and nature of development. This would help to conserve and enhance biodiversity and geodiversity by directing development away from sensitive locations and managing new development so that its design minimises effects on the natural environment and helps to create and connect habitats.
<b>Air Quality</b>	Existing legislation in SPPS and PPS seeks to manage air quality to acceptable thresholds through Environmental Impact Assessment screening. However, without action from the LDP to direct development to sustainable locations and increase provision of sustainable transport infrastructure, the trend for increasing car ownership and travel is likely to continue with associated emissions of air pollutants likely to increase.
<b>Water</b>	The LWWP would still go ahead without the LDP, but development would potentially be ad-hoc and piecemeal, as it would be difficult to coordinate development and its supporting infrastructure. Utility providers may find it difficult to

Themes	Likely Evolution without the LDP
	plan for growth and expansion in their networks, the knock-on effects of which could result in delays and inability to adequately address water quality, which could contravene the WFD requirements.
<b>Contaminated Soils</b>	The council and NIEA would continue to regulate the Waste and Contaminated Land (Northern Ireland) Order 1997 as much as possible, and to assess and manage land contamination through the provisions of government guidance Contaminated Land Report 11 (Model Procedures for the Management of Land Contamination).
<b>Cultural &amp; Built Heritage</b>	SPPS provides protection at a regional level for built heritage assets, alongside PPS6 and the Addendum to PPS6. However, without the LDP to coordinate protection and enhancement at a local level, sites that have not been formally designated will have limited protection and could be at risk of inappropriate development. Historic character and townscape would be at risk of erosion, and it may be difficult to protect or offer enhancements to assets on the Heritage at Risk Register. The number of sites on the register would also likely increase.
<b>Landscape</b>	SPPS provides some protection and is supported by PPS2 and PPS21. Without the LDP however, local sites unique to Belfast may have limited protection, such as Geodiversity sites.
<b>Waste</b>	European and Regional targets are set to incrementally reduce waste and encourage recycling in the city, therefore the LDP may not have much impact. The council will still explore opportunities for further waste reduction and innovative solutions.
<b>Climate Change</b>	The NI Climate Change Adaptation Programme will continue to provide strategic objectives on climate change and adaptation. The Climate Change Risk Assessment will continue as the statutory requirement of the UK Climate Change Act, published every 5 years, whilst cross departmental action is reviewed on an annual basis to ensure greenhouse gas reduction targets are met via the Cross Departmental Working Group on Climate Change. Nonetheless, without the LDP the current and projected flood risk trend is likely to continue, the impact magnitude and extent of which may also increase. Positive management is required, with a local response to sequentially allocate sites for development avoiding the highest risk areas as a first principle.
<b>Renewable Energy</b>	The existing PPS was a reactive policy formulated in 2009 that requires minor changes in relation to renewable energy generation and promotion. However, targets for renewable energy consumption are outlined in the draft Programme for Government (40% of energy from renewable source and 10% heat from renewable source) and without the LDP, a strategic framework to deliver these would be absent through the planning system.

**Table 10: Likely Evolution of Current Issues without the LDP**

### 3.7 The Sustainability Appraisal Framework

- 3.7.1 The SA Framework ensures that the Draft Plan Strategy considers the sustainability needs of the area in terms of its social, economic and environmental effects. It enables the potential effects of the plan to be described, analysed and compared.
- 3.7.2 The framework consists of a list of 'Sustainability Objectives', referred to in this report as the 'SA Objectives'. These derive from the PPP review, the baseline data, and the key sustainability issues. They also draw directly from the strategic aims and objectives of the LDP (listed in **Section 2**); however, they are tailored further to reflect the specific sustainability issues and characteristics that currently exist in the Belfast area. Whilst distinct from the LDP Objectives in that sense, it is important that both sets of objectives remain directly compatible and consistent with each other. This compatibility is appraised in **Section 5** along with the LDP vision and aims.
- 3.7.3 In addition to the scoping data and LDP objectives, the SEA environmental receptors set out in Annex I (f) of the SEA Directive have also been a key determining factor when identifying the SA Objectives<sup>17</sup>.
- 3.7.4 **Table 11** identifies the 19 SA objectives that make up the SA Framework and clarifies from which theme and SEA topic they have originated.
- 3.7.5 We have also identified a number of decision-making criteria to help inform us of what each objective is hoping to achieve, shown in **Table 12**. These will be used when we actually appraise each option and alternative against the framework, allowing us to understand which options may be more preferable than others.

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<sup>17</sup> [SEA Directive 2001/42/EC, Annex I \(f\)](#)

Theme	SEA Topic	SA Objective
<b>SOCIAL</b>	Population	20. Reduce deprivation & encourage an inclusive & equal society
	Population Human Health	21. Improve health & wellbeing for an improved quality of life
	Population	22. To provide opportunity for good quality housing & enable people to meet their housing needs
	Population	23. Increase community safety by supporting the reduction of crime & antisocial behaviour
	Population	24. To improve skills & education of residents through providing high quality, accessible lifelong learning opportunities
	Population	25. Retain & enhance access to local services & facilities
<b>ECONOMIC</b>	Population	26. To ensure local residents have access to employment opportunities
	Population	27. Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver
	Population Air Climatic Factors	28. Promote an integrated transport system & encourage sustainable travel
<b>ENVIRONMENTAL</b>	Biodiversity Flora Fauna	29. Maintain & enhance biodiversity assets & protect habitats & species
	Soil	30. Protect & enhance soil quality
	Cultural Heritage (including architectural & archaeological) Material Assets	31. Protect, conserve & enhance the historic environment, heritage assets & their settings
	Landscape	32. Protect, maintain & enhance the quality of Belfast's distinctive landscape & geodiversity
	Landscape	33. Protect & enhance open space & natural greenspace including Belfast's countryside asset
	Material Assets	34. Promote the sustainable management of waste
	Water Material Assets	35. Promote the quality, efficient use of water resources
	Air	36. Reduce air pollution & ensure continued improvements to air quality
	Climatic Factors	37. Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy
	Climatic Factors	38. Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk

**Table 11: The SA Framework**

SA Objective	Decision Making Criteria
<b>SOCIAL</b>	
1. Reduce deprivation & encourage an inclusive & equal society	<ul style="list-style-type: none"> <li>• Reduce deprivation and social exclusion, in particular in those areas most affected</li> <li>• Encourage an inclusive and equal society</li> <li>• Promote regeneration, reducing disparity with surrounding areas</li> <li>• Increase the ability of people to influence decisions</li> </ul>
2. Improve health & wellbeing for an improved quality of life	<ul style="list-style-type: none"> <li>• Encourage healthy lifestyles and provide opportunities for sport and recreation</li> <li>• Support the reduction of health inequalities</li> <li>• Improve physical and mental health</li> <li>• Reduce noise levels and concerns</li> <li>• Contribute to improving air quality</li> <li>• Contribute to improving water quality</li> <li>• Encourage access to ecological networks by encouraging green infrastructure, providing walking and cycle routes to heritage and other recreational places of interest</li> </ul>
3. To provide opportunity for good quality housing & enable people to meet their housing needs	<ul style="list-style-type: none"> <li>• Increase access to affordable housing</li> <li>• Encourage a range of dwelling type, size and tenure</li> <li>• Reduce homelessness</li> <li>• Improve housing quality</li> <li>• Ensure the housing needs of an ageing population are met</li> <li>• Reduce the number of vacant properties</li> </ul>
4. Increase community safety by supporting the reduction of crime & antisocial behaviour	<ul style="list-style-type: none"> <li>• Support a reduction in the actual levels of crime</li> <li>• Reduce the fear of crime</li> <li>• Promote design out crime principles</li> </ul>



SA Objective	Decision Making Criteria
5. To improve skills & education of residents through providing high quality, accessible lifelong learning opportunities	<ul style="list-style-type: none"> <li>• Improve access to high quality educational facilities</li> <li>• Improve the level of investment in key community services</li> <li>• Make access easier for those without access to a car</li> <li>• Improve access to work experience, apprenticeships and training, especially young people</li> <li>• Encourage affordable access</li> </ul>
6. Retain & enhance access to local services & facilities	<ul style="list-style-type: none"> <li>• Encourage the level of investment in key community services</li> <li>• Improve accessibility to key local services (schools, GP surgeries, hospitals, town, district and local centres) and employment opportunities</li> <li>• Encourage affordable access</li> <li>• Make access easier for those without access to a car</li> <li>• Protect the shopping and community services function of local service centres</li> </ul>
<b>ECONOMIC</b>	
7. To ensure local residents have access to employment opportunities	<ul style="list-style-type: none"> <li>• Help to reduce short and long-term local unemployment</li> <li>• Encourage job opportunities for those most in need of employment particularly those in areas of high unemployment deprivation</li> </ul>
8. Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver	<ul style="list-style-type: none"> <li>• Encourage new business start-ups and opportunities for local people</li> <li>• Encourage business development and enhance productivity</li> <li>• Encourage the resilience of business and the local economy</li> <li>• Promote growth in key sectors</li> <li>• Promote growth in key clusters</li> <li>• Enhance the image of the area as a business location</li> <li>• Encourage indigenous business</li> </ul>

SA Objective	Decision Making Criteria
	<ul style="list-style-type: none"> <li>• Encourage inward investment</li> <li>• Make land and property available for business development</li> <li>• Encourage tourism investment</li> <li>• Maintain and enhance the vitality and viability of the City Centre</li> </ul>
<p>9. Promote an integrated transport system &amp; encourage sustainable travel</p>	<ul style="list-style-type: none"> <li>• Support the reduction of traffic volumes and congestion</li> <li>• Encourage the proportion of journeys using modes other than the car</li> <li>• Encourage walking and cycling</li> <li>• Support the reduction of commuting</li> <li>• Improve accessibility to work by public transport; walking and cycling</li> <li>• Improve access between key employment areas and key transport interchanges</li> <li>• Encourage rail and water-based freight movement</li> </ul>
<b>ENVIRONMENTAL</b>	
<p>10. Maintain &amp; enhance biodiversity assets &amp; protect habitats &amp; species</p>	<ul style="list-style-type: none"> <li>• Conserve and enhance habitats of international, regional and/or local importance and create habitats in areas of deficiency</li> <li>• Conserve and enhance species diversity; and in particular avoid harm to protected species</li> <li>• Conserve and enhance sites designated for their nature conservation interest at the regional or national level</li> <li>• Protect and enhance woodland cover and trees and promote their management</li> <li>• Improve access to and promote the educational value of sites of biodiversity value</li> <li>• Protect and enhance geodiversity</li> <li>• Enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks</li> </ul>

SA Objective	Decision Making Criteria
11. Protect & enhance soil quality	<ul style="list-style-type: none"> <li>• Minimise development on Greenfield sites</li> <li>• Ensure that, where possible, new development occurs on derelict; vacant and underused previously developed land and buildings</li> <li>• Ensure contaminated land is remediated as appropriate</li> <li>• Minimise the loss of soils to development and maintain and enhance soil quality</li> <li>• Reduce the risk of subsidence</li> <li>• Increase the amount of development on previously developed land</li> </ul>
12. Protect, conserve & enhance the historic environment, heritage assets & their settings	<ul style="list-style-type: none"> <li>• Protect and enhance Conservation Areas and other sites, features and areas of historical and cultural value</li> <li>• Protect listed buildings and their settings</li> <li>• Help preserve, enhance and record archaeological features and their settings</li> <li>• Help to protect and enhance historic buildings through sensitive adaptation and reuse</li> <li>• Enhance the quality of priority areas for townscape and public realm enhancements</li> <li>• Protect and enhance local distinctiveness and sense of place</li> <li>• Encourage and support the articulation of statutory requirements in relation to Scheduled Historic Monuments (i.e., requirement for consent), together with appropriate site zoning and policy preparation.</li> <li>• Recognise and work to preserve and enhance the historic townscape</li> <li>• Foster Heritage Led Regeneration</li> <li>• Promote heritage based, sustainable tourism</li> </ul>
13. Protect, maintain & enhance the quality of Belfast's distinctive landscape & geodiversity	<ul style="list-style-type: none"> <li>• Improve the landscape character and visual amenity of open spaces</li> <li>• Protect and enhance sensitive landscapes</li> <li>• Minimise visual intrusion and protect views</li> </ul>

SA Objective	Decision Making Criteria
14. Protect & enhance open space & natural greenspace including Belfast's countryside asset	<ul style="list-style-type: none"> <li>• Ensure adequate access to public open space within a reasonable walking distance from people's homes</li> <li>• Promote access to green infrastructure and ecological networks</li> <li>• Create new areas of open space and natural greenspace</li> </ul>
15. Promote the sustainable management of waste	<ul style="list-style-type: none"> <li>• Lead to reduced consumption of materials and resources</li> <li>• Encourage the reduction of household waste</li> <li>• Support the increase waste recovery and recycling and improve facilities</li> <li>• Support the reduction hazardous waste</li> <li>• Support the reduction of waste in the construction industry</li> </ul>
16. Promote the quality, efficient use of water resources	<ul style="list-style-type: none"> <li>• Support the improvement of the quality of surface and ground water</li> <li>• Encourage the reduction of water consumption and improve water efficiency</li> <li>• Encourage the efficient use and management of water</li> <li>• Incorporate sustainable urban drainage systems as part of the design where appropriate</li> </ul>
17. Reduce air pollution & ensure continued improvements to air quality	<ul style="list-style-type: none"> <li>• Support the improvement of air quality</li> <li>• Help achieve the objectives of the Air Quality Management Plan</li> <li>• Reduce emissions of key pollutants</li> </ul>
18. Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy	<ul style="list-style-type: none"> <li>• Encourage renewable energy production</li> <li>• Reduce emissions of greenhouse gases</li> <li>• Support the development of a Circular Economy</li> <li>• Support the digital economy</li> <li>• Help to reduce our energy consumption</li> </ul>

SA Objective	Decision Making Criteria
19. Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk	<ul style="list-style-type: none"> <li>• Help reduce the impact of increased urban temperatures on people and property</li> <li>• Promote sustainable design and construction measures</li> <li>• Support development located outside areas of high flood risk</li> <li>• Reduce emissions of greenhouse gases by reducing energy consumption and need to travel</li> <li>• Support an increased proportion of energy needs being met from renewable sources</li> <li>• Reduce emissions of ozone depleting substances</li> <li>• Minimise the risk of flooding from rivers and watercourses to people and property</li> <li>• Reduce the risk of damage to property from storm events</li> <li>• Support building designs and a green infrastructure that is adapted to climate change</li> <li>• Incorporate new green space and habitat creation helping to mitigate flood risk</li> </ul>

**Table 12: SA Framework – Decision Making Criteria**

### **3.8 Limitations and difficulties encountered**

- 3.8.1 Limitations and difficulties were encountered during identification of relevant baseline information, in that up-to-date data was in some cases difficult to retrieve. Thus, whilst the best data available was used to reflect current conditions, in some cases it may not provide an accurate picture of conditions in 2018.
- 3.8.2 For example, due to recent Local Government Review and the alignment of the new council boundaries, it was difficult in some cases to distinguish trends in data which related to the new Belfast City Council boundary. Other data was provided on a regional scale or at a specific plan level, so localised data directly relating primarily to Belfast Local Government District was not available.
- 3.8.3 This was particularly true of data in relation to water. Belfast falls within the North-Eastern River Basin and some elements of data do not relate directly down to the Belfast council area. Similarly, it was difficult to obtain accurate or up to date datasets on natural heritage lists including the Priority Species List for Belfast.
- 3.8.4 Limitations were also encountered when accessing data in relation to infrastructure constraints. For example, the lack of data on the capacity of wastewater treatment infrastructure means that it is not possible to fully assess the implications of the preferred growth scenario, particularly in relation to soil quality or water quality.

### Box 3: Impact of BASELINE INFORMATION

The identification of baseline data is vital to both the LDP and SA:

- ▶ Assessing a wide range of topics allows us to identify existing conditions, issues and challenges. This forms a strong evidence base against which the effect of the LDP can be assessed and monitored, and also to understand how each issue could evolve without the LDP in place.
- ▶ By understanding existing conditions, we can respond to each by developing specific SA objectives to appraise the LDP aims and policies. The baseline data themes have essentially formed the basis of the SA Framework.
- ▶ In essence the baseline evidence enables us to anticipate how the LDP could tackle existing issues. We can use the SA to look at alternative solutions where a policy or aim may fall short, and then understand to what extent it actually succeeds in doing so through efficient monitoring.





## 4 PLAN ISSUES & OPTIONS

With the basis for the SA established through the scoping stage; we were able to begin appraising the **Draft Plan Strategy** (DPS), starting with the key strategic options. The results were presented and consulted on through the **Preferred Options Paper** (POP), the **SA Interim Report** and **Scoping Report**. The purpose of SA and LDP interaction at this stage was to inform and influence the development of the plan's key options, ensuring an early and effective sustainability input. This section provides a summary of the process and shows how appraisal of the POP and subsequent consultation comments have informed our key decision-making and development of the subsequent DPS stages.

### 4.1 Structure of the Draft Plan Strategy

- 4.1.1 The DPS consists of five parts, as set out below. The Interim SA Appraisal of the POP focussed on **part 1**; i.e., the strategic aspirations, aims and objectives of the LDP. Referred to as the 'POP stage', the results are repeated here in **Section 4**, with the remaining 'DPS stage' appraised in **Section 5** of this report.

Structure of the Draft Plan Strategy			Appraisal Stage	
Part	Description		POP	DPS
1	Strategic aims and objectives	Growth aspiration and 4 strategic aims designed to help deliver the city envisaged in 2035; supported by a series of strategic objectives	Interim SA Report	SA Report Section 4
2	Strategic policies	Strategic approach of the plan; set out through a series of overarching strategic plan policies to deliver the aims and objectives, and provide a foundation upon which other policies are based		SA Report Section 5
3	Spatial development strategy	How the council will manage the spatial growth of the plan area		
4	Topic-based policies	A series of topic-based policies to deal with the main land use challenges, which will form the basis for making decisions on planning applications		
5	Delivery	Outlines how the above policies will be delivered, implemented and monitored		

**Table 13: Appraisal of the DPS under Interim SA Report & SA Report**

4.1.2 The following figure shows a detailed breakdown of the LDP, and the appraisals carried out.

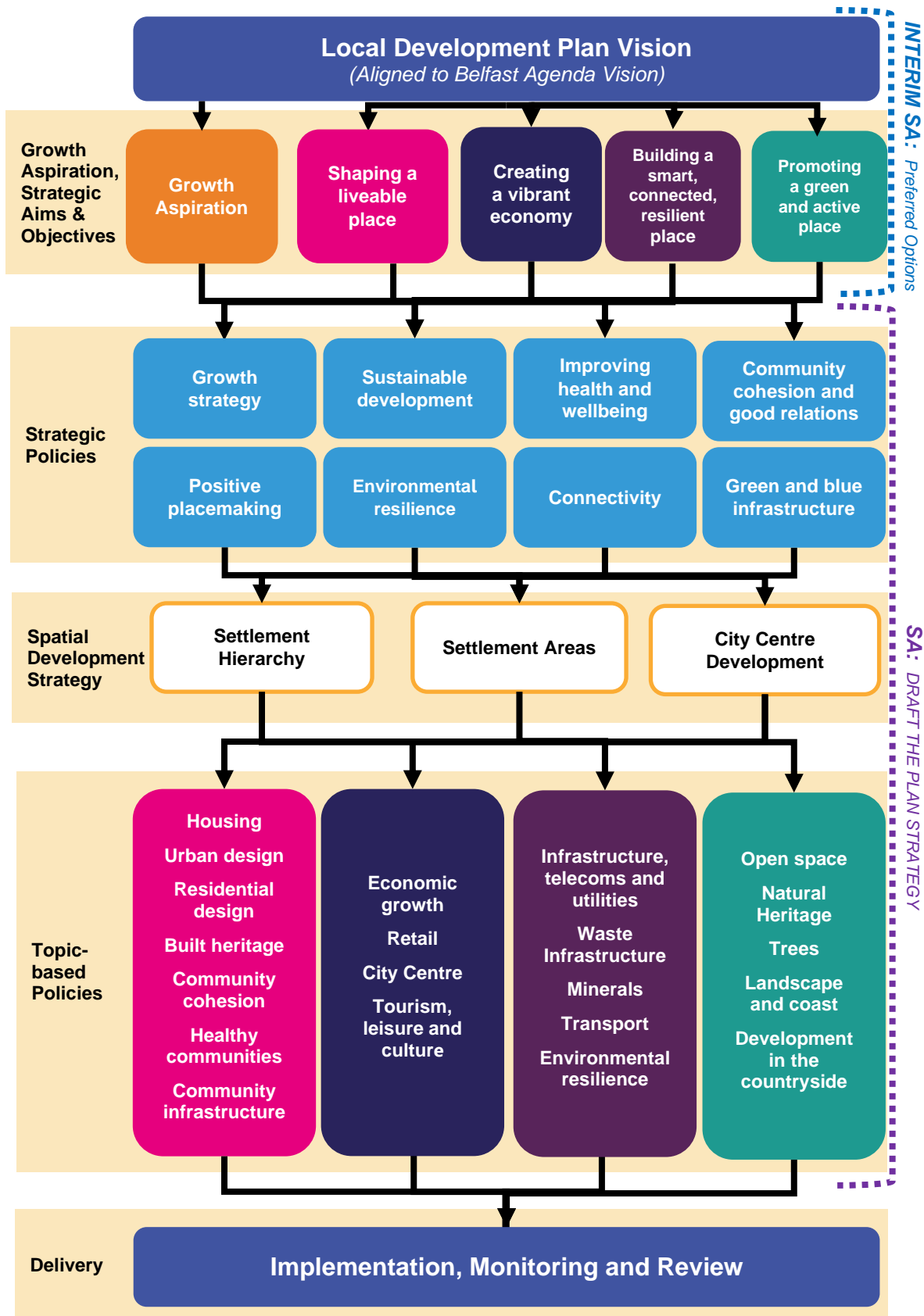


Figure 7: Appraisal Stages of the Draft Plan Strategy

## 4.2 Main strategic options

4.2.1 The first process in the POP stage was to formulate a number of options for the growth aspiration and strategic aims of the LDP. Each option was identified by closely considering the key sustainability issues, together with consideration of the PPP review and baseline data for Belfast, in an effort to identify how best we can deliver and achieve the objectives of the LDP. Each was then assigned a specific reference to reflect the different themes:

Reference	Theme	Strategic options
Growth Aspiration	How will we grow Belfast?	GR 1
Strategic Aim 1	Shaping a Liveable Place	LP 1 – 17
Strategic Aim 2	Creating a Vibrant Economy	VE 1 – 13
Strategic Aim 3	Building a Smart, Connected, Resilient Place	SCR 1 – 13
Strategic Aim 4	Promoting a Green & Active Place	GA 1 – 4

**Table 14: LDP Strategic Options**

4.2.1 Each option and reasonable alternative were then appraised against the SA Framework to identify the likely social, economic and environmental effects. This included short, medium and long-term implications for each, and any proposed mitigation or enhancement measures. It also set out the reasons why the preferred options were chosen, and why others were considered but rejected.

4.2.2 The results of the POP appraisal were presented in the SA Interim Report; the key outcomes of which are summarised in this section. The relevant assessment matrices and corresponding summary tables can be found in **Appendix 7**.

### 4.3 Appraisal approach

- 4.3.1 A total of 98 options and alternatives were identified and appraised through the SA Interim Report for the POP. In a number of instances, alternatives could be scoped out or rejected at an early stage. Where this was the case, there was no reason to carry out a detailed appraisal against the framework as they were not considered to be a 'reasonable' alternative.
- 4.3.2 This was common where the comparison was based on a 'policy versus no policy' situation. For example, under LP5 'Traveller Accommodation', there is currently no specific need for additional traveller accommodation to be provided. The introduction of locally specific policies in the LDP would provide protection for existing traveller facilities, allocation of specific sites if a need is identified, and criteria-based policy for assessing future proposals for the provision of suitable facilities. On the other hand, a 'no policy' option would mean that proposals brought forward during the plan period would be assessed in accordance with SPPS and the current PPS12 Policy H3 Traveller Accommodation. Whilst a proposal could still be assessed under these policies, the scoping stage of the SA identified potential negative effects under the social objectives. It was concluded from this that it was essential to actively plan for local traveller accommodation to avoid these effects; to protect existing traveller sites; and having the ability to accommodate additional need as and when identified through up-to-date housing market assessments or housing needs analysis. Providing suitable policies through the LDP is therefore the only realistic way to achieve the sustainability aspirations of the plan, and whilst the 'no policy' alternative exists, it is not considered reasonable and could therefore be scoped out from the outset.
- 4.3.3 In other cases, there were no alternatives to compare against. GA3 'Natural Heritage' considered the natural heritage of the city, the diversity of its landscapes, habitats, species and geology, their contribution to the city's distinctive and attractive character, and the unique and iconic visual amenity value of places such as Belfast Lough and the Lagan Valley

Regional Park. The council has a statutory duty to further the conservation of biodiversity under the Wildlife and Natural Environment (Northern Ireland) Act 2011, and to ensure the LDP complies with existing legislation, SPPS and the PPS 2 Natural Heritage. As such there was no alternative, reasonable or otherwise, other than the LDP providing a strategic policy approach that recognises natural heritage value, supports biodiversity, and manages development of designated areas.

4.3.4 The options which were scoped out at an early stage are listed below. The detailed appraisal results in [Appendix 7](#) clarify the reasons why.

<b>No Reasonable Alternative</b>	
LP7	Quality design in residential development
LP9	Community infrastructure
LP11	Urban design
VE12	Shared space in the city centre
SCR5	Public transport network
SCR9	Mitigating environmental change
SCR11	Adapting to environmental change
SCR13	Waste infrastructure
GA3	Natural heritage
<b>Policy versus No Policy</b>	
LP5	Traveller accommodation
LP8	Promotion of health & wellbeing
LP12	Arterial routes / gateways
LP13	Spatial connectivity
LP16	Local distinctiveness
LP17	Energy efficient design
VE4	Supporting development needs of higher education institutions
VE7	Vitality and viability of centres
VE13	City centre development opportunities
GA2	Provision of new open space and green corridors

Policy versus Existing Policy or Legislation	
LP6	Shared housing provision
VE5	Network and hierarchy of centres
VE8	City centre boundary
VE11	City centre living
SCR1	Telecommunication infrastructure
SCR2	Water and sewerage infrastructure
SCR3	Electricity and gas infrastructure
SCR4	Walking & cycling (active travel) including design guidance
SCR6	Road network
SCR7	Parking demand management
SCR10	Renewable energy

#### 4.4 Likely Significant Effects

4.4.1 Of the 98 options appraised, a total of 48 were taken forward as preferred options. The following boxes present a brief summary of the key findings we identified.

##### Supporting Economic Growth

Primarily positive effects noted under social and economic objectives; with mixed, neutral, unknown and minor negatives under the environmental objectives. This reinforces the need to ensure an appropriate balance between economic growth and safeguarding the environment as advocated in the SPPS.

##### Shaping a Liveable Place

Significant percentage of neutral effects; the majority of which fall within the environmental objectives, with the highest proportion within SA Objective 11 'Protect & Enhance Soil Quality'. Notable positive scoring recorded under 'Community Cohesion' and 'New Homes' options, tying in with the high level aims of the RDS 2035.

### Creating a Vibrant Economy

Mixed positive and negative effects recorded, showing primarily positive effects under social and economic objectives; against mixed, neutral, unknown and minor negatives under the environmental objectives. This again reinforces the need to ensure appropriate balance between economic growth and safeguarding the environment as per SPPS.

### Building a Smart, Connected, Resilient Place

In contrast, with the exception of a small number of unknowns, positive effects were generally noted across the Environmental Objectives, with a higher proportion of Social and Economic Objectives returning neutral effects.

### Promoting a Green & Active Place

Notable positive scoring recorded, with no negatives, unknowns or mixed results.

4.4.2 Due to the strategic nature of the POP and the lack of detail on specific site locations, it was not possible to predict likely effects for all options. Those that scored as 'uncertain' will be further appraised at later stages of the plan-making process when site specific policies and locations are allocated, such as for travellers' accommodation, housing mix etc. Likewise, no sites have been allocated for housing at this stage, which explains uncertainty for some options, such as potential compatibility with the proposed Tall Building option.

4.4.3 The focus of the comments above are grouped under the LDP aspiration and aims. **Table 15** provides a more detailed understanding of the likely significant and cumulative effects of the preferred options, with the focus now on the 19 SA Objectives. As this shows, the likely significant effects of the preferred options would be generally positive overall, with a small number of mixed effects. The following key findings are noted:



- **SA Objectives 1 (Deprivation / inclusivity) & 2 (Health & wellbeing)** recorded high proportions of significant positive effects across all strategic aims.
- **SA Objective 8 (Regional economic driver / Competitive place)** scored 54% significant positive and 40% positive effects. Only 6% (3 preferred options) returned neutral effects, highlighting the significant impact the LDP can have in helping establish and grow Belfast as a highly competitive and regional economic driver.
- The mixed effects identified for the **Environmental objectives** outline the need to carefully balance and manage natural resources when bringing forward development and economic growth over the LDP period. The use of mitigation measures will often be an option to help offset any adverse significant effects and should be fully explored.

4.4.4 The detailed scoring matrices and summary tables for all individual options and reasonable alternatives are presented in **Appendix 7**. The corresponding matrices and tables for the likely significant effects can be found in **Appendix 8**.

#### Box 4: Impact of PREFERRED OPTIONS APPRAISAL

Appraisal of the strategic options within the POP has directly informed the preparation and appraisal of the Draft Plan Strategy:

- ▶ Strategic options established for the LDP aspirations and aims
- ▶ Reasonable alternatives scoped and appraised
- ▶ Preferred options identified through detailed appraisal

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
<b>SOCIAL</b>		
1. Deprivation & inclusivity	<p>The preferred options will likely make an overall positive contribution to this objective. Whilst they propose an ambitious level of growth, the LDP can deliver infrastructure and connectivity to facilitate population growth, balanced with the need to retain and protect environmental assets. With support for community cohesion and greater access to jobs, this can act as a catalyst in improving wealth, economic opportunities, and regeneration of deprived communities.</p> <p>The positive effects from the preferred options are likely to be cumulatively significant over the medium to long term.</p>	++ Significant Positive
2. Health & wellbeing	<p>The projected population growth could increase pressure on existing healthcare facilities; however, this can be reduced through provision of adequate access to services and a modal shift towards sustainable transport and movement. Reducing vehicle congestion can improve air quality, whilst the safeguarding and enhancement of existing green spaces can benefit mental and physical wellbeing.</p> <p>The positive effects are therefore likely to be cumulatively significant over the whole plan period.</p>	++ Significant Positive
3. Quality housing & housing need	<p>Whilst the preferred options would encourage good quality housing design that meets need with adequate infrastructure, it is inevitable that more waste will be created, even with sustainable waste management. Increased growth can also impact land resources, landscape, biodiversity and cultural heritage. Nonetheless, they seek to target brownfield land, increase densities and positively reuse existing buildings, whilst new innovative economic development could improve waste management and environmental policies could mitigate negative impacts.</p>	++ Significant Positive

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
	Significant positive effects are likely to be realised from the outset, increasing over the medium to long term as new development is delivered across the plan area.	
4. Safety, crime & antisocial behaviour	<p>The preferred options can affect crime and community safety indirectly through encouragement of better design and incorporating secure by design ethos into policy. However, in light of the strategic nature of the plan, there are uncertainties due to the lack of detail on the site locations particularly for Travellers Accommodation and Housing Mix.</p> <p>As such the cumulative effects remain uncertain at this stage of the process.</p>	<p><b>?</b> Unknown effects</p>
5. Education & learning opportunities	<p>Population growth will increase the need for education facilities; however, the plan will encourage protection of existing infrastructure, provision of essential infrastructure prior to future development, and sustainable use of transport; all of which are likely to have positive effects.</p> <p>More than half of the preferred options identified neutral effects or no relationship however, and as such the cumulative impact over the plan period is also likely to be neutral.</p>	<p><b>0</b> Neutral effects</p>
6. Access to services & facilities	<p>Whilst population growth could put pressure on existing services and facilities, the preferred options seek to ensure their protection and enhancement to address demand. Alongside this, infrastructure improvement and sustainable transportation can improve access. Adopting the SPPS sequential approach will help strengthen existing neighbourhood centres and arterial routes adding to local viability and vitality.</p> <p>There are uncertainties on site locations for affordable housing due to the strategic nature of the plan. Nonetheless the cumulative positive effects are still likely to be significant throughout the plan period.</p>	<p><b>++</b> Significant Positive</p>

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
<b>ECONOMIC</b>		
7. Employment opportunities	<p>The preferred options will help increase access to employment opportunities through appropriately located development and sustainable transport. Increased growth can impact land resources, landscape, biodiversity and cultural heritage; however, the options seek to target brownfield land, increase densities and positively reuse existing buildings, whilst environmental policies can mitigate negative impacts. Uncertainties and mixed effects were identified due to the strategic nature of the plan.</p> <p>Significant positive effects are likely to be realised from the outset, increasing in significance over the medium to long term.</p>	++ Significant Positive
8. Economic development	<p>Employment development will make a significant contribution towards achieving economic growth, whilst protecting, enhancing and managing the built and historic environment could indirectly support economic growth. Demand for housing growth could equally increase, whilst existing employment sites would be retained, and improved access encouraged for educational opportunities.</p> <p>Such an approach would undoubtedly make Belfast a more attractive place to invest in, to work in and to visit, and as such the cumulative effects are likely to be positive over the medium to long-term.</p>	++ Significant Positive
9. Sustainable transport & travel	<p>Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality.</p> <p>Significant positive effects are therefore likely to be realised throughout the plan period.</p>	++ Significant Positive

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
<b>ENVIRONMENTAL</b>		
10. Biodiversity	<p>The preferred options seek to retain areas of open space which will help to provide habitats and retain ecological networks. However, new development may put pressure on these areas. Whilst a number of options identified potential negative effects, it is difficult to assess at this strategic level and will depend largely on the integration of green and blue infrastructure, and the direction of mitigation measures, site allocation stage and the HRA.</p> <p>The cumulative effects are therefore considered mixed until such times as detailed policy, site proposals and mitigation measures are known.</p>	+/- Mixed effects
11. Soil	<p>Redevelopment of brownfield land for housing could have a positive effect on soils by reducing contamination. However, new employment development could result in by-products or pollution, whilst improvements to the road network are uncertain at this strategic stage without specific land zoning.</p> <p>The cumulative effects are therefore considered mixed until such times as detailed policy, site proposals and mitigation measures are known.</p>	+/- Mixed effects
12. Built & historic environment	<p>The preferred options aim to achieve good quality design and be sympathetic to the built and historic environment promoting sustainable reuse to foster local distinctiveness. In addition, new development that is high quality but also in keeping with the landscape and townscape can improve heritage assets, surroundings and appearance. On the other hand, proposed growth may adversely impact on the historic environment, and it is less easy to retrofit assets to meet high standards on energy efficiency.</p> <p>On balance therefore the cumulative effects would be considered as mixed.</p>	+/- Mixed effects

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
13. Landscape & geodiversity	<p>Greenfield sites and sites close to sensitive areas could be at risk due to proposed growth projections and encouragement of development for employment, economic development and housing. However, the potential impact remains unknown until sites are prioritised for zoning, policies agreed, and mitigation measures explored, based on full appraisal of effects on landscape and geodiversity. For the same reason impacts from road network improvements remain unknown currently.</p> <p>It is therefore not possible to identify likely cumulative effects at this stage of the process.</p>	<p>?</p> <p>Unknown effects</p>
14. Open space & natural greenspace	<p>Minor negative effects have been identified for economic growth and employment land supply which may increase pressure to develop greenfield sites and sites close to sensitive areas. However, the degree of impact cannot be accurately appraised until later stages of the plan process where sites, policies and mitigation have been identified. Likewise uncertain effects have been identified for improvements to the road network due to uncertainties of location. Mixed effects were also identified as the City Centres boundary requires defining to reflect projected development, which necessitates reviewing open space requirements; for example, to reflect increases in residential populations. Nonetheless, the preferred options scored strong positive effects overall with clear benefits in terms of recreation, access to community greenways, and walking and cycling networks.</p> <p>Overall, the cumulative positive effects are likely to be significant throughout the plan period.</p>	<p>++</p> <p>Significant Positive</p>

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
15. Sustainable waste management	<p>Whilst the plan could encourage better design of new development incorporating sustainable waste management, it is inevitable that more waste will be created with additional development. New economic development could bring potentially new innovative ideas to managing waste whilst also providing jobs.</p> <p>It is considered to have neutral effects on waste overall.</p>	<p><b>0</b> Neutral effects</p>
16. Water	<p>The Strategic Drainage Infrastructure Plan through the LWWP will seek to support economic growth, protect the environment and address flood risk. The LDP seeks to ensure provision of necessary infrastructure to support development, and whilst this could put additional pressure on water sources including water waste treatment works, new development can be provided through a phased approach. Measures to mitigate water stress can also be planned for with the appropriate statutory body.</p> <p>The cumulative effects on water are therefore likely to be mixed.</p>	<p><b>+/-</b> Mixed effects</p>
17. Air quality	<p>The preferred options encourage population, economic and housing growth, which could consequentially increase air pollution from higher levels of vehicular traffic and emissions. However, the options also include various options and measures seeking to reduce private car use, and provide improved access and opportunities for walking, cycling and sustainable modes of transport. New economic development also has the potential to bring new innovative ideas for air pollution management, and jobs provision through new Cleantech Technologies and the circular economy.</p> <p>It is considered to have cumulative minor positive effects on air quality.</p>	<p><b>+</b> Minor Positive</p>

Sustainability Objective	Summary of Likely Significant Effects	Cumulative Effect
18. Greenhouse gas & low carbon economy	<p>The preferred options encourage a circular economy approach, with a model for growth that concentrates on the existing urban area and encourages people to live closer to jobs. They will promote sustainable transport, the use of appropriate renewable energy development, the creation of opportunities for decentralising energy and reducing reliance on fossil fuels, and the promotion of renewable energy schemes, with appropriate safeguards to ensure they have no or minimal impact on quality of life. There are likely economic benefits and job opportunities associated with innovative ways in reducing, reusing and recycling waste, as well as environmental benefits from reducing climate emissions associated with raw materials and the need to landfill.</p> <p>Overall, the preferred option is therefore considered to have a cumulative positive effect on low carbon economy.</p>	++ Significant Positive
19. Climate change & flood risk	<p>The preferred options provide support for appropriate renewable energy development which could encourage actions to mitigate climate change. Minor negatives have been identified however for employment land supply and locations given that existing locations are located within flood risk areas, and there is also potential for an overall increase in greenhouse gas emissions from vehicular traffic, commercial activity and housing. In response, the inclusion and promotion of sustainable modes of transport, energy efficient design, clean technology and increased opportunities to walking and cycling are expected to minimise emissions.</p> <p>Overall, the preferred options are likely to have a cumulatively mixed effect on climate change.</p>	+/- Mixed effects

**Table 15: Summary of Preferred Options Likely Effects**



## 4.5 Consultation process

- 4.5.1 Consultation plays a hugely important role in the preparation of the LDP and informing the way in which we undertake the SA. We have actively consulted as required throughout the process and will continue to do so as we move forward. This ensures that relevant stakeholders have the opportunity to be involved and ultimately help shape the LDP.
- 4.5.2 To date we have consulted on both the Scoping Report (baseline evidence, SA methodology etc.) and the Interim SA Report (our preferred strategic options as set out in the POP). The comments received on the Scoping Report are detailed in full in its corresponding appendices, whilst those received for the Interim SA Report are detailed in full in **Appendix 9** of this report.
- 4.5.3 The comments received through this process have had a direct influence on our preparation of the Draft Plan Strategy and this SA Report. The scoping information has been expanded and improved to capture elements that were previously over-looked or lacking in strength, whilst policies and preferred options have been updated or strengthened where required.

### Impact on SA Framework

- 4.5.4 One of the most significant impacts of the consultation process on the SA was a re-structure and strengthening of the SA Framework. This new framework has now been applied to carry out a more effective and informative appraisal of the Draft Plan Strategy, as described and shown below:
- Objective 10 reworded and strengthened from 'Support the transition to a low carbon economy' to 'Support mitigation efforts to reduce greenhouse gas emissions and transition to a low carbon economy',

- Decision making criteria for this objective subsequently revised to include ‘will it reduce emissions of greenhouse gases’, covering both transport and energy generation,
- Re-ordered framework by moving Objective 10 to Objective 18, to sit within the environmental theme and alongside Objective 19, which relates to climate change adaption; and
- Objective 19 reworded to include requirement for measures to mitigate against the impact of climate change.

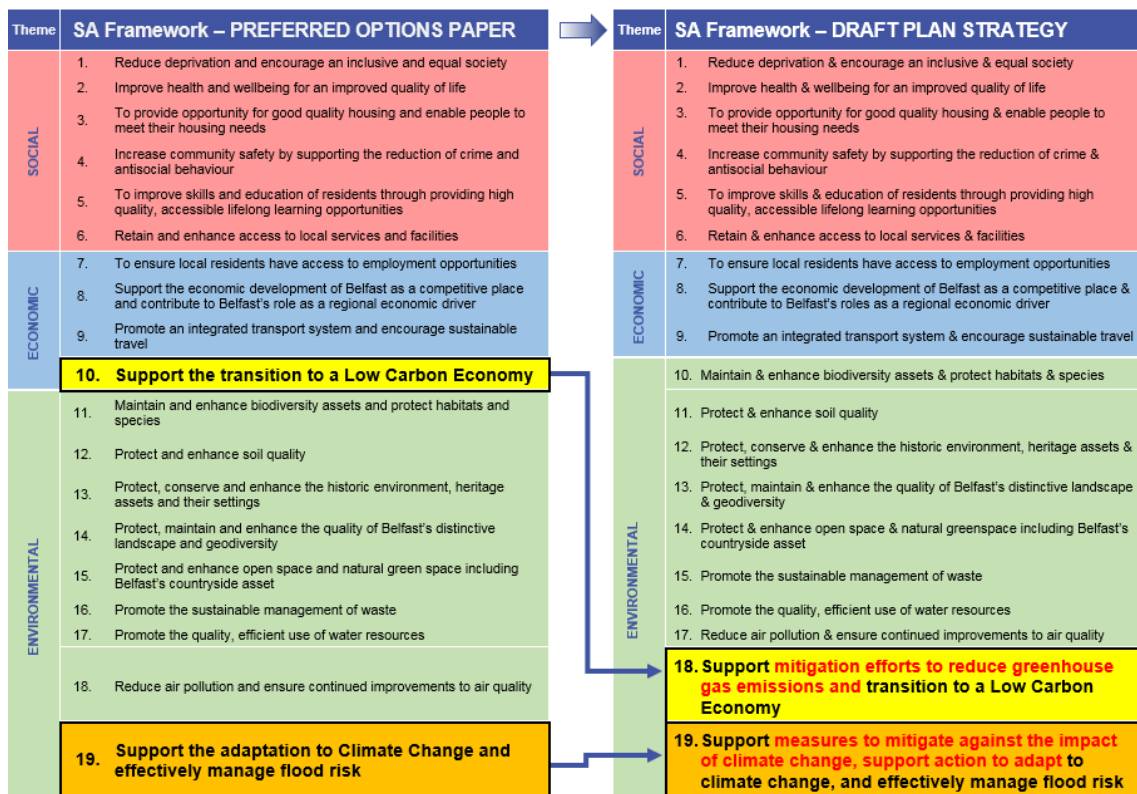


Figure 8: Evolution of the SA Framework through Consultation

4.5.5 The results presented in **Appendices 7 and 8** show the appraisal of the strategic options for the POP, prior to receipt of consultation comments, and thus are based upon the initial framework on the left. The appraisal of the Draft Plan Strategy, as presented in **Section 5** and **Appendices 10, 11** and **12**, is now based upon the new, updated framework on the right.

## Impact on Scoping

4.5.6 The consultation process has had a strong influence on the scoping information that supports the LDP and the SA. In particular, the following aspects in **Table 16** have been updated or addressed specifically as a result of consultation.

<b>Community Plan</b>
✓ Stronger links and parallels recognised between the LDP and the Belfast Agenda, including the strategic monitoring of both plans
<b>PPP Review, Baseline Information &amp; Key Sustainability Issues</b>
✓ PPP review documentation updated
✓ Additional documentation added to International and Regional Level PPP review
✓ Implications for the LDP under PPP review and key sustainable issues reviewed and updated
✓ Baseline data fully updated to reflect Consultation Body comments and most up-to-date information available
✓ Greater recognition of the need for sustainable development, environmental protection and resilience
✓ Acknowledgment that the LDP's proposed growth aspirations will result in additional pressures on sewerage infrastructure which will be challenging to achieve. This in turn has directly informed the LDP strategy in that growth will be phased to align with required infrastructure improvements
✓ Stronger recognition of tourism, leisure and cultural potential for historic assets and landscape character. Now reflected through draft LDP policies such as TLC1 and TLC2
✓ Additional measures introduced to ensure protection, in addition to conservation and enhancement, of the historic environment; and promotion of sympathetic, heritage-led development which preserves historic assets and their setting; in particular those assets at risk from neglect, decay and development pressure
✓ Stronger recognition of the importance of consultation with relevant bodies during the planning process to ensure the historic environment is protected, conserved and enhanced, in line with the RDS
✓ Greater encouragement and promotion of the sensitive and innovative re-use of existing historic listed and non-listed building stock
✓ Increased recognition of potential loss or erosion of landscape and townscape character or quality
✓ Explicit recognition of the importance of protecting and improving water quality, avoiding hard surfacing in residential areas, flood mitigation, and incorporating SuDS measures in all built development
✓ Acknowledgement that changes in water level may have impacts on built heritage features in addition to environmental impacts on natural heritage
✓ Acknowledgement of additional air quality benefits from policies that promote energy efficiency and sustainable travel
✓ Stronger recognition of the links between green infrastructure provision and active travel infrastructure (walking, cycling), with subsequent reductions in private car use and air pollutant emissions. Now reflected in Policy Tran 1 'Active Travel'

**Table 16: Evolution of Scoping Information through Consultation**

## Impact on Policy Appraisals

4.5.7 In addition to the scoping information, the consultation process also allows for wider and more effective appraisal and scoring of options and alternatives. In this instance the Consultation Body highlighted a number of instances where policy effects could potentially differ from those which we had identified. For example, in any new development whilst there may be a positive effect for the historic environment, there is almost always also a significant potential for negative effects. Where such differences were highlighted, we have fully acknowledged the comments and reasoning, and reflected this when undertaking the SA of the Draft Plan Strategy.

4.5.8 We also agree with the Consultation Body that in some instances the mitigation measures offered for the preferred options were lacking in suitable detail. As such we have ensured a more detailed approach has been taken when considering mitigation through the SA of the Draft Plan Strategy. This includes greater consideration and explanation as to how the mitigation measure can help avoid any potential adverse effects. A detailed break-down of all comments relating to policy appraisal is again shown in **Appendix 9** together with our response.

## Consultation Support

4.5.9 In addition to the above, support was received from the Consultation Body on a number of key principles. Such support is strongly welcomed, and we have continued to promote and endorse these principles through the draft LDP policies. Examples of some of these areas are:

- GA2: Provision of New Open Space and Green Corridors, in particular the reference to integrating blue and green infrastructure, and links with biodiversity,
- Reference to the register of Historic Parks, Gardens and Demesnes of Special Historic Interest,
- Promoting awareness, involvement and understanding of the historic environment; and

- Reference to listed buildings and scheduled monuments with industrial heritage value, in association with environmentally sensitive areas in the Belfast Metropolitan Area Coastal Area.

### Box 5: Impact of CONSULTATION

We have fully considered and taken account of all consultation responses, which have directly informed and influenced our appraisal of the Draft Plan Strategy:

- ▶ Stronger links to the Belfast Agenda
- ▶ A more thorough and substantial evidence base and scoping data
- ▶ A stronger and more effective SA Framework and Objectives
- ▶ Improved accuracy of policy effect appraisals
- ▶ Increased consideration of mitigation measures
- ▶ Support for key principles that will be further endorsed through future stages

## 4.6 Limitations and difficulties encountered

- 4.6.1 The strategic nature of the POP and lack of specific policies or site allocations meant it was not always possible to predict potential effects for all options or reasonable alternatives.
- 4.6.2 For example, the preferred options for urban design policies focused on the overall impact of achieving high quality design. The policies were therefore not intended to be site or subject specific, with balanced consideration of potential effects for all options and reasonable alternatives informed by professional judgement.

4.6.3 Such effects will be appraised at each subsequent stage of the SA process when the appropriate level of detail is available.

#### 4.7 Informing the Draft Plan Strategy

4.7.1 The previous sections have outlined each stage of the SA process so far, and identified how the SA has directly influenced and informed the preparation of our LDP.

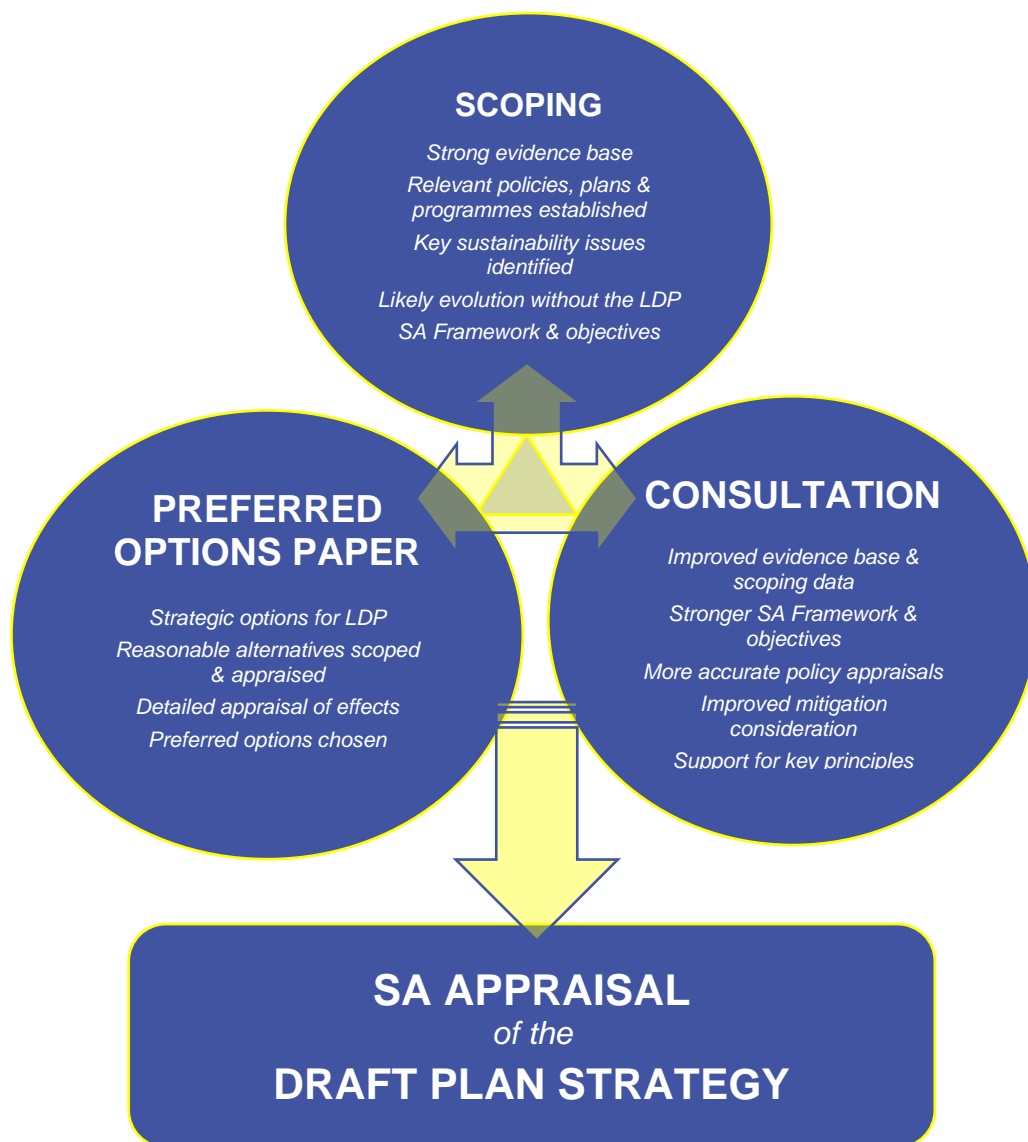


Figure 9: Informing the Draft Plan Strategy

4.7.2 With each stage feeding directly into and informing the next, this has allowed us to undertake a more effective and robust appraisal of the Draft Plan Strategy.

#### Box 6: Impact of INTERIM SA

Appraisal of the POP has directly informed the preparation and appraisal of the Draft Plan Strategy:

- ▶ A stronger evidence base, SA Framework, and objectives
- ▶ Strategic options established to achieve the aspirations and aims of the LDP
- ▶ Reasonable alternatives scoped and appraised, and preferred options identified
- ▶ Likely significant effects assessed; mitigation and monitoring measures established
- ▶ Direct engagement, influence and consideration through consultation



## 5 APPRAISAL: DRAFT PLAN STRATEGY

This chapter presents the key findings from the SA of the preferred Draft Plan Strategy. This stage of the SA has been undertaken directly in parallel with the preparation of the Draft Plan Strategy, building upon existing SA information and taking account of comments received through the consultation process to date. Beginning with the compatibility of the LDP vision, aims and objectives with the SA Framework; it then moves on to the main appraisal of policy options and alternatives. This includes likely significant and cumulative effects, and proposed mitigation or enhancement measures.

### 5.1 Appraisal approach

5.1.1 Appraisal of each option for the Draft Plan Strategy uses the same methodology as before. The difference between this stage and the Interim Report is that the range of reasonable alternatives considered is now within the context of the preferred options chosen through the POP stage, and focuses specifically on individual policies that can deliver the strategic objectives of the LDP. It allows the council to comprehensively assess each option under the SEA Directive parameters and identify potential mitigation measures to offset adverse effects or enhance positive effects.

5.1.2 As with previous iterations, detailed assessment matrices have been used to appraise each policy option and alternative and are scored against the SA Objectives using the same methodology. The matrices are again accompanied by detailed commentary tables which explain:

- What reasonable alternatives have been identified and on what basis,
- How they have been assessed and compared; and
- What the preferred options are, and why the alternatives have been rejected.

- 5.1.3 The primary purpose of this stage is to inform key planning decisions such as housing and employment numbers, affordable housing proportion etc., and to consider alternative ways to deal with existing problems identified at scoping stage such as deprivation, health, air quality etc. It will also directly inform the range of reasonable alternatives to be considered in the SA of the subsequent Local Policies Plan, which is particularly important as the council may have to consider the potential effects of any changes made to the draft plan as a result of the independent examination. The SEA Directive sets out requirements for the adoption of the draft plan, which must include the reasons for the choosing the plan as adopted in light of the other reasonable alternatives that were appraised. The council may therefore have to refer back to the appraisal of alternatives in order to determine any likely significant effects in circumstances where an alternative option needs to be considered for the adoption of the plan. Where changes are recommended, it is for the council to exercise judgement in determining whether such changes are significant enough to require a further SA; ensuring that any modifications to the SA are proportionate to the level of change being made to the draft plan document.
- 5.1.4 The following sections present the key findings of the appraisal results. The detailed matrices and accompanying summary tables can be found in **Appendices 10, 11 and 12.**

## **5.2 Appraisal of the LDP objectives**

- 5.2.1 Current SA guidelines set out in DPPN suggest that prior to appraising specific policy options, the LDP objectives should be assessed for compatibility with the SA Objectives. We have also appraised the LDP vision using the same method to gain a full understanding of how the overall aims of the LDP are likely to perform against the SA Framework.

5.2.2 This appraisal was initially carried out at POP stage and presented in the Interim SA Report; however, it is presented again in this section to establish a sound context for the Draft Plan Strategy.

### **LDP vision compatibility**

5.2.3 Along with the aims and objectives, the LDP vision was developed directly from the baseline evidence, topic papers, and the emerging work in the Belfast Agenda. The vision sets a general, high-level aspiration for sustainable development to enable Belfast to be a place to live, work, visit and invest. **Table 17** shows that the main aspirations of the vision support the full range of SA Objectives and that there is a positive compatibility between the two.

Theme	LDP Vision	Likely Effect	SA Objectives
Social	<ul style="list-style-type: none"> <li>• 'Thriving well connected neighbourhoods where people want to love to live'</li> <li>• 'The city will be a gateway for opportunities locally...supporting progressive, healthy, safe and vibrant communities'</li> </ul>	++ Significant positive	1 – 6
Economic	<ul style="list-style-type: none"> <li>• 'Globally successful dynamic 21<sup>st</sup> Century Regional City'</li> <li>• 'Vibrant economic heart'</li> <li>• 'With sustainable mixed-use businesses'</li> <li>• 'Attracts investment, talent and visitors'</li> <li>• 'A gateway to opportunities locally, nationally and worldwide'</li> <li>• 'Strong local economy supporting... vibrant communities'</li> </ul>	++ Significant positive	7 – 9
Environmental	<ul style="list-style-type: none"> <li>• '[A city] that is environmentally resilient'</li> </ul>	+ Minor positive	10 – 19

**Table 17: LDP Vision Compatibility with SA Objectives**

### LDP objectives compatibility

5.2.4 Moving on to the strategic objectives of the LDP, their compatibility with the SA Objectives is appraised in **Table 18** with the detailed commentary tables in **Appendix 10**. The total scores are calculated for each SA Objective by reading horizontally across each column, using the standard scoring formula:

<b>--</b> Significant Negative	<b>-</b> Minor Negative	<b>?</b> Unknown Effect	<b>+/-</b> Mixed Effects	<b>0</b> No Effect or Relationship	<b>+</b> Minor Positive	<b>++</b> Significant Positive
-2	-1	0	0	0	1	2

**Key 10: LDP Objectives – Compatibility Symbols, Colour Coding & Scoring Weight**

5.2.5 The total scores are then categorised by applying the following colour scheme formula:

<b>--</b> Significant Negative	<b>-</b> Minor Negative	<b>?</b> Unknown Effect	<b>+/-</b> Mixed Effects	<b>0</b> No Effect or Relationship	<b>+</b> Minor Positive	<b>++</b> Significant Positive
-20 to -38	-1 to -19	0	0	0	1 to 19	20 to 38

**Figure 11: LDP Objectives – Total Compatibility Symbols, Colour Coding & Scoring Weight**

5.2.6 The results of this appraisal show that the LDP objectives broadly support the full range of SA Objectives and that there is a good degree of compatibility between the two; with 14 minor positive and seven significant positive scores.

Theme	SA ↓	LDP Strategic Objectives →																				TOTAL		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20			21
Social	1	+	++	+	++	++	+	++	++	++	++	++	++	++	++	+	0	+	++	+	+	+	32	++
	2	++	++	?	++	++	?	++	++	++	+	++	++	++	++	++	+	+	++	++	+	+	33	++
	3	+	++	++	++	++	+	+	++	+	?	+	+	+	++	+	+	+	+	+/-	+/-	+	24	++
	4	?	+	+	++	++	+	++	+	+	?	++	+	0	0	0	0	0	0	0	0	0	14	+
	5	+	+	0	0	+	0	+	?	?	?	+	+	++	++	+	+	+	+	0	0	0	14	+
	6	+	++	+	+	++	+	++	++	++	++	++	++	++	++	++	0	0	+	++	0	0	27	++
Economic	7	+	+	0	+	+	0	+	++	++	+	+	+	++	+	0	0	+	0	0	0	16	+	
	8	++	+	+/-	+	++	+/-	0	++	++	++	++	++	++	0	0	0	+	0	+/-	+/-	20	++	
	9	+	+	+	+	++	+	+	+	++	+	+	+	++	++	+	0	+	+	+	+	24	++	
Environmental	10	+/-	+/-	+	0	+	+	+/-	+/-	0	?	?	++	+/-	++	++	++	++	++	++	++	20	++	
	11	+/-	0	0	0	0	0	0	+/-	+/-	?	0	+	?	+	+	+	+	+	++	++	11	+	
	12	+/-	+/-	++	+	+	++	+/-	?	?	?	+	0	+	+	+	+	0	+	+	+	14	+	
	13	?	+/-	++	0	+	+	0	+/-	+/-	?	?	+	0	+	+	0	+	++	++	++	15	+	
	14	+/-	+/-	+	0	+	+	+	+/-	+/-	?	+	++	+	+	+	0	+	++	++	++	18	+	
	15	+/-	+/-	0	0	+	0	0	+/-	+/-	+/-	0	+	0	0	0	++	+	0	0	0	5	+	
	16	+/-	+/-	0	0	0	0	0	+/-	+/-	+/-	+	++	0	++	+	0	+	0	+	+	11	+	
	17	?	?	0	0	0	0	0	+	+	+/-	++	+	++	++	++	+	++	++	++	++	21	++	
	18	++	0	0	0	0	0	0	+	+	0	+	+	++	+	+	+	+	0	+	+	15	+	
	19	+/-	+	+	0	+	+	0	+/-	+/-	+/-	+	++	++	++	++	++	++	++	++	++	25	++	

KEY
++ Significant Positive
+ Minor Positive
0 No Effect or Relationship
+/- Mixed Effects
? Uncertain – Effect Unknown
- Minor Negative
-- Significant Negative

Table 18: Compatibility of Belfast LDP Strategic Objectives with SA Objectives

### **5.3 Appraisal of policy options and alternatives**

- 5.3.1 Establishing a positive compatibility of the LDP vision and objectives with the SA Framework provides the council with a sound degree of comfort to appraise options and reasonable alternatives for the specific policies. This section summarises the SA findings of the predicted, likely significant effects of the preferred policies. It explains how social, economic and environmental problems were considered in developing each policy; the potential timescale of the effects i.e., short, medium or long-term; proposed mitigation measures; and any uncertainties or risks that have been identified during the plan preparation process.
- 5.3.2 A total of 114 policy options have been identified and appraised for the Draft Plan Strategy and are organised under the following topics and themes.

Topic	Theme	Policy
Strategic	Strategic Policies	SP1 – SP8
Spatial	Spatial Development Strategy	SD1 – SD3
Shaping a Liveable Place	Housing	HOU1 – HOU13
	Urban Design	DES1 – DES4
	Residential Design	RD1 – RD3
	Built Heritage	BH1 – BH6
	Community Cohesion and Good Relations	CGR1 – CGR2
	Promoting Healthy Communities	HC1
	Community Infrastructure	CI1 – CI2
Creating a Vibrant Economy	Economic Growth	EC1 – EC7
	Retail	RET1 – RET6
	City Centre	CC1
	Supporting Tourism, Leisure and Cultural Development	TLC1 – TLC4
Building a Smart, Connected, Resilient Place	Infrastructure, Telecommunications and Utilities	ITU1 – ITU3
	Renewable Energy	ITU4
	Waste/ Infrastructure	W1 – W5
	Minerals	M1
	Transportation	TRAN1 – TRAN12
	Environmental Resilience	ENV1 – ENV5
Promoting a Green and Active Place	Open Space	GB1, OS1 – OS7
	Natural Heritage	NH1
	Trees	TRE1
	Landscape and Coast	LC1 – LC4
	Development in the Countryside	DC1 – DC13

**Table 19: Draft Plan Strategy Policy Options**



### Identifying reasonable alternatives

- 5.3.3 As with the POP and Interim SA stage, reasonable alternatives are not always identified for every policy option or may have been rejected at an early stage. For a significant number of policies, the option of reasonable alternatives was appraised and scoped out in the Interim SA Report for the POP. Where this was not the case, alternatives could again be scoped out where there was a 'policy versus no policy' situation, or where only one option was deemed as being 'reasonable'; for example, where a specific policy was required to meet the needs of existing policy or legislation.
- 5.3.4 **Appendix 11** identifies and explains where and why alternatives were rejected or scoped out at an early stage. Of the 98 options where reasonable alternatives were not considered, the majority of these were due to the need to meet aims of existing policies or legislation.
- 5.3.5 All options and alternatives have then been appraised and compared to identify the likely effects, their level of significance, and the potential for mitigation measures. The results are presented in **Appendix 11** by way of detailed matrices and summary tables. Together these explain what reasonable alternatives have been identified and on what basis; how they have been assessed and compared; what the preferred options are; and why the other alternatives were rejected.
- 5.3.6 **Table 20** on the following page combines the overall policy scores, using the standard scoring formula as set out in the methodology in **Section 2**. This gives a visual, quick-glance overview of the how effective the plan is likely to be, by applying the relevant scoring colouring to each policy.

Effect →	--	-	0	+/-	?	+	++
LDP ↓	Significant Negative	Minor Negative	Unknown Effect	Mixed Effects	No Effect or Relationship	Minor Positive	Significant Positive
Strategic Policies	0	0	0	0	0	6	2
Spatial Development	0	0	0	0	0	2	1
Shaping a Liveable Place	0	0	0	0	0	27	4
Creating a Vibrant Economy	0	0	0	0	0	17	1
Building a Smart Connected Resilient Place	0	2	0	0	0	22	3
Promoting a Green & Active Place	0	0	0	0	0	25	2
<b>All LDP Policies</b>	0	2	0	0	0	99	13

Table 20: Likely Significant Effects Overview

## 5.4 Likely significant effects

- 5.4.1 Whilst the previous tables show a straightforward, visual representation of each policy and the LDP as whole, the following sections provide a more detailed appraisal of the likely significant effects of the Draft Plan Strategy, with the focus now on each objective of the SA Framework.
- 5.4.2 To begin with, the key findings are detailed in **Tables 21** to **23** under each SA objective. These provide the basis for the subsequent summary of likely cumulative effects of the plan.
- 5.4.3 The summaries are ordered primarily as per the four main topics of Shaping a Liveable Place; Creating a Vibrant Economy; a Smart, Connected, Resilient Place and a Green and Active Place; however, given their strategic nature the Strategic Policies and Spatial Development topics are incorporated throughout.

#### 5.4.4 Social Sustainability Objectives: SA1 – SA6

<b>Likely Significant Effects – Key Findings</b>	
<b>SA1: Reduce deprivation and encourage an inclusive and equal society</b>	
	The majority of the draft policies would have minor positive social effects, recognising the importance of good quality housing and building community cohesion in achieving balanced and inclusive communities, particularly in the many single identity neighbourhoods in Belfast that suffer from deprivation. These minor positives rise to significant positives as we move from the inner city, which has some of the most deprived areas, towards the more affluent outer city areas. Significant positive effects were also identified through accessible accommodation, increased employment options, community cohesion and interface uses, and a greater choice of affordable housing.
	Improving wealth and economic opportunities provides significant positive effects through inclusive and accessible employment creation. A balanced approach to encouraging employment opportunities in local areas would subsequently have minor positive effects in reducing deprivation.
	Improving accessibility and travel choices will have significant positives in terms of achieving a more inclusive and equal society, as would safeguarding environmental quality; specifically in inner city areas where environmental issues such as air and noise quality will be most problematic. Improving infrastructure and protecting the environment will bring minor positive benefits to society as a whole.
	The Green and Blue Network would have significant positive effects as it seeks to ensure greater connectivity, accessibility and resilience. Elsewhere minor positive effects would be achieved by protecting and improving open space and safeguarding natural heritage for the benefit of all. This will help reduce inequality and exclusion whilst also meeting community needs, including rural communities.
<b>SA2: Improve health and wellbeing for an improved quality of life</b>	
	Better community cohesion demonstrates the link between good residential design, deprivation, and health and well-being, which is reinforced by significant positive effects. Minor positives would be achieved through increased employment opportunities and improved housing solutions and community cohesion; all of which are critical elements in creating and maintaining a healthy, well-balanced city with improved quality of life for all. Focusing retail development or services, and higher density housing, in locations that are highly accessible will also bring minor positives, and should reduce the need to travel by car, encourage the use of active travel modes etc.

### Likely Significant Effects – Key Findings

Placemaking through master planning will bring significant positive effects. Shaping regeneration opportunities and improved connectivity will deliver high quality living and working environments, whilst more accessible economic and social opportunities provision in the city centre will encourage greater social interaction. All of these can promote healthy lifestyles, with direct benefits to quality of life, and physical and mental wellbeing. For the same reasons, minor positive effects would be achieved by supporting development to improve the natural and built environment, which may encourage more walking and cycling within local neighbourhood areas.

Promoting accessibility and improved travel choices, in particular active travel, and improving environmental quality will have significant positive effects on human health. Improving infrastructure whilst protecting the environment will have minor positive effects on quality of life.

Significant positive effects would again be achieved through the Green and Blue network, together with the draft open space and trees policies; all of which seeks to ensure more active lifestyles and a high quality attractive environment that promotes wellbeing. The remaining green and active policies will generally have minor positive effects as they seek to protect and improve open space and recreation facilities for the wellbeing benefit of all.

### SA3: To provide opportunity for good quality housing and enable people to meet their housing needs

Generally significant and minor positive effects would be achieved across the housing and residential design policies. 31,600 new homes are proposed over the plan period, with a strong focus on provision of quality housing and meeting housing need, whilst allocation of housing land will be enabled through the settlement hierarchy. It is recognised that a lack of community cohesion can be a significant barrier to housing delivery, particularly affordable housing, which can then prevent housing need from being met in specific areas of the city. However, by supporting and facilitating development that improves good relations, we can help promote greater cohesion, improve relationships and provide opportunities for mixed-tenure housing in shared neighbourhoods.

Significant positive economic effects would be achieved due to high-quality mixed-use regeneration projects that will provide a variety of residential accommodation to meet housing need for diverse groups of people. Provision of a range of good quality housing types that can accommodate a diverse mix of need to suit demographic requirements would have minor positive effects.

Good quality housing with accessibility for all, in addition to policies that address environmental constraints and focus on the reuse of brownfield and contaminated land for housing, will also have significant positive effects.

The Green and Blue Network, together with the draft trees policies, seek to ensure access for residents to recreation and amenity spaces, which would have significant positive effects. Protecting and improving the quality of the natural environment and open space to support existing residents and new housing developments will have generally minor positive effects throughout the city.

## Likely Significant Effects – Key Findings

### SA4: Increase community safety by supporting the reduction of crime and antisocial behaviour

Good quality design and improved community cohesion would promote good relations, which can have positive social effects by helping reduce antisocial behaviour and crime in many of the existing deprived communities.

A number of the housing draft policies have uncertain effects in relation to reducing crime and ASB. This is due to the fact that the full effects will only be realised following the Local Policies Plan stage when the Plan is adopted and being implemented on the ground. Community safety can be improved by tackling the problems and inequalities of deprivation but would be an indirect or secondary effect that is less certain.

Minor positive economic effects would be obtained by encouraging good quality design and a greater diversity of land uses. Increased economic activity can generate greater footfall and improve urban vitality; improving natural, passive surveillance which can in turn help deter anti-social behaviour and reduce crime.

Whilst the majority of policies will have a neutral effect on community safety in terms of connectivity, positive effects were identified where the promotion of careful design and improved environmental quality can increase neighbourhood safety. Likewise, the encouragement of active travel routes and increased footfall would also have positive effects.

The Green and Blue Network will again have significant positive effects as it seeks to promote greater accessibility, connectivity and level of use of natural, recreation and amenity spaces. Protecting and improving the quality of the environment will create attractive, safe and inclusive neighbourhoods, which will have minor positive effects.

### SA5: To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities

Significant positive effects were noted for conversions and subdivisions, as these would facilitate increased choice of suitable accommodation for students. Likewise opening up the City's learning environments to communities historically perceived or actually excluded from educational facilities, particularly where new facilities are encouraged in accessible locations for all communities, would bring about significant positive change. Uncertain effects were identified as whilst improving community cohesion may attract some residents within deprived communities to feel more confident about accessing educational opportunities, the extent to which skills would be improved is uncertain at this stage.

Significant positive effects were identified under the policy support for third level educational facilities, which would facilitate training to improve skill levels and widen employment opportunities. Adopting a balanced approach to ensure adequate provision for lifelong education opportunities that are easily accessible by sustainable modes of transport, would result in minor positive effects.

### Likely Significant Effects – Key Findings

Facilitating infrastructure, including telecommunications, which can improve access to education and skill development opportunities would also have a minor positive effect.

#### SA6: Retain and enhance access to local services and facilities

A plan-led approach to new residential development will have significant positive effects by ensuring that locations for new housing maximise the opportunity to be located close to, and take advantage of existing services and facilities, in addition to planning for new ones. Increasing densities, subdivision of properties, and meanwhile uses in interface areas would also bring about significant positives. Designating settlements in accordance with the level of facilities and services available to serve them, and providing better targeting of various policies, such as focussing retail development or services in locations that are highly accessible, will have minor positive effects. As with SA Objective 5, improving community cohesion may attract some within deprived communities to access more local services and facilities, however, the extent to which skills would be improved remains uncertain at this stage. Likewise, there are uncertain effects in relation to affordable housing as the location of new housing would only be known at LPP stage.

Significant positive effects would arise from mixed-use regeneration schemes that provide new local services and facilities to support the new population that will live and work in the city; as well as the potential to enhance a diverse range of key services in the city centre. Protecting and promoting the development of local services and facilities that are highly accessible by sustainable modes of transport would have minor positive effects.

Improving accessibility and promoting modal shift will have significant positive effects.

The Green and Blue Network seeks to promote greater accessibility and connectivity throughout the city, including to local services, which would bring about minor positive effects.

**Table 21: Key Findings for Social Objectives**

#### 5.4.5 Economic Sustainability Objectives: SA7 – SA9

<b>Likely Significant Effects – Key Findings</b>	
<b>SA7: To ensure local residents have access to employment opportunities</b>	
	<p>Job creation, increased densities, provision of specialist residential accommodation, sub-division of properties, community cohesion and community infrastructure, and access to employment opportunities and facilities will result in significant positive effects. Minor positive effects will be achieved by ensuring greater connectivity between where people live and work. As with SA Objectives 5 and 6, the effects of improving community cohesion are uncertain, as whilst there may be improved access to local services and facilities, the extent to which skills would be improved is unknown at this stage. Likewise, as the location of new housing will not be known until LPP stage, the effects in relation to affordable housing are also uncertain.</p>
	<p>Directing economic growth to development opportunity areas will bring significant positive effects by helping diversify land uses in the city centre, reflecting the wider economic structural changes resulting from knowledge economy growth. Integrating development areas with surrounding neighbourhoods would also ensure employment opportunities are accessible to local residents. Minor positive effects would be achieved through provision of good sustainable connections to a diverse range of employment opportunities suitable for a variety of skill sets. A variety of accessible employment creation opportunities in the City Centre would result in predominantly significant positive economic effects. Minor positive effects were noted with potential employment opportunities for local areas.</p>
	<p>Support for improved telecommunication services will support business and an increase in employment opportunities, giving significant positive results. Improved infrastructure and accessibility across the city will generally result in minor positive or neutral effects.</p>
	<p>The Green and Blue Network would have a minor positive effect on this objective as it seeks to promote greater accessibility and connectivity throughout the city, including to places of employment.</p>
<b>SA8: Support the economic development of Belfast as a competitive place and contribute to Belfast’s roles as a regional economic driver</b>	
	<p>Significant positive effects were identified in relation to economic development, in particular residential design, community cohesion and provision of housing and affordable housing. This emphasises the importance of good design and housing in building up a skilled resident population to further economic development.</p>



### Likely Significant Effects – Key Findings

Enabling the city to compete with similar sized cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy will have minor positive effects. Likewise improving community cohesion and good relations will have city-wide benefits and help to attract inward investment from a range of business sectors, encouraging new start-ups and existing business to locate and expand in the city. Responding to wider economic structural changes through new innovation and growth of the knowledge economy can also help the city compete on a global level, which would have significant positive results. Provision of sufficient land to support a diverse range of economic development opportunities will strengthen Belfast position as the economic driver for the region, giving predominantly significant positive effects. Promoting sustainable inclusive economic growth, to diversify and strengthen the economy, and subsequently Belfast as the regional economic driver, will have minor positive effects. Minor positive effects would also be achieved by protecting existing economic uses. Designated as the region's Principal City by the RDS, the draft plan policies will ensure Belfast continues to function as the regional economic driver. The overall positive results for this objective are unsurprising given the plan's ambitious growth aspirations for Belfast, in accordance with the Belfast Agenda, RDS and SPPS.

Facilitating infrastructure necessary to support economic growth, improving resilience to flooding and attractiveness for investment will all bring significant positive results. A strong number of policies will also have minor positive effects on supporting economic development through infrastructure improvements and improving accessibility.

The Green and Blue Network and draft trees policy which will make the city an attractive city in which to live and work, thus bringing significant positive effects by stimulating economic growth. Elsewhere minor positive effects will be achieved through protecting and improving environmental quality; creating an attractive city which encourages economic investment.

### SA9: Promote an integrated transport system and encourage sustainable travel

Significant positive effects have been identified through enabling better integration of land use planning and transportation through the city corridors, which should ensure greater connectivity between where people live and work. Higher densities, management of short term let accommodation, tall buildings, improved residential design and community cohesion would all have significant positive effects, as they would contribute to a more compact, populated city with balanced communities who have good access to public transport networks. The proposed population and economic development growth is likely to facilitate a well-integrated public transport system with a larger percentage of the population living closer to their place of work and to key local services and facilities, which would bring positive minor effects across the city. Uncertain effects have been noted as whilst increased community safety may encourage more people to navigate by sustainable travel means, including walking and cycling, the extent to which this policy would actively support integrated transport systems and sustainable travel is unknown. Uncertainties are also noted in respect of

<b>Likely Significant Effects – Key Findings</b>	
	affordable housing and adaptable, accessible accommodation, as the locations of these homes are not known at this stage.
	Supporting development to help deliver an efficient, compact city form that is served by a highly accessible integrated transport network based on public transport, cycling and walking, will result in a mixture of both significant and minor positive effects. The significant effects are likely with the city centre first retail policy approach that would enhance the opportunity for an economically viable sustainable travel network. The minor effects would stem from the same approach to economic development, which would build the critical mass to support sustainable travel and an integrated transport system.
	Support for sustainable travel will have clear significant positive effects on this objective. The draft transport policies seek to develop an integrated transport system with more sustainable travel modes, together with additional policy support to mitigate against environmental change.
	The Green and Blue Network will have significant positive effects, with additional minor positives achieved by the open space and landscape policies, all of which facilitate a compact urban form and active travel. However, policies facilitating rural development may not promote sustainable transport modes in all cases.

**Table 22: Key Findings for Economic Objectives**

#### 5.4.6 Environmental Sustainability Objectives: SA10 – SA19

### Likely Significant Effects – Key Findings

#### SA10: Maintain and enhance biodiversity assets, and protect habitats and species

Whilst a number of draft policies would have neutral effects, policies that encourage good design, seek to protect existing open space and create new open space where necessary would all have minor positive effects. Uncertainties are noted in respect of housing mix as the location and mix of new homes are not known at this stage. Minor negative effects were identified as the pressure for growth may potentially impact on biodiversity, in particular due to increased housing and employment development pressures, even on brownfield sites.

In terms of economic issues, the draft policies would generally have no significant effect. The draft policies recognise that the protection and enhancement of the biodiversity assets, habitats and species is an important element within the context of sustainable development. The plan proposes a balanced approach to the integration of the three pillars of sustainable development (social, economic, and environmental factors), and ensuring none of these would be promoted over the other, which would result in minor positive effects. Potential pressure on biodiversity from new tourism facilities provided mixed effects, though this may be mitigated through habitat protection and enhancement. Some minor economic positives were identified under this objective from the economic policies, where development on existing sites in the city centre would be encouraged.

Implementing the Green and Blue infrastructure, which promotes habitats and biodiversity, would have significant positive effects. In contrast, the waste infrastructure has the potential to have negative effects on this objective due to the size and nature of the facilities.

In addition to the Green and Blue Network, significant positive effects were also identified for the natural heritage and trees policies, which seek to protect and promote a connected network of natural resources and biodiversity. The remaining policies that seek to protect and improve the quality of the environment, including natural heritage, would have minor positive effects.

#### SA11: Protect and enhance soil quality

Bringing existing contaminated brownfield sites back into active use, as a result of economic growth, would have minor positive effects on soil quality. Likewise, the prioritisation of brownfield sites, a windfall allowance within the urban footprint, higher densities and the protection of residential stock would all help to protect soil quality on greenfield sites and could lead to actual improvement of soil conditions on some contaminated brownfield sites. The protection of parks, gardens and demesnes, together with the active use of interface sites, would also help to protect soil quality and could also lead to contaminated sites being improved to facilitate new development. Otherwise, a number of draft policies would result in neutral effects on soil quality.

### Likely Significant Effects – Key Findings

A balanced approach to delivering sustainable development would have predominantly minor positive effects. In particular the promotion of brown field sites for economic development within the urban area has the potential for remediation works to improve soil conditions. Mixed effects were recorded due to potential pressure for developing greenfield sites for new tourism facilities.

Protecting the natural environment and promoting ecosystem services will generally have minor positive effects, however potential minor negative effects may also occur as landfilling can lead to soil pollution.

Significant positive effects were identified from the draft trees policy in particular, on account of their positive benefits for ecosystem services, including water quality and soil quality/stability. Protecting and improving the quality of the natural environment would generally have minor positive effects.

### SA12: Protect, conserve and enhance the historic environment, heritage assets and their settings

Significant positive effects are identified as economic growth and increased housing growth could provide opportunities to bring disused, brownfield and heritage assets back into use, thereby enhancing streetscapes and revitalising long-standing areas of dereliction. As would be expected, the majority of the built heritage draft policies would also have significant positive effects as they which seek to protect, conserve and enhance the historic environment and heritage assets. Whilst the draft windfall policy would maximise opportunities to reuse historic buildings and preserve the historic character of streets and townscapes; there is a risk that as pressure for land increases over time, the historic environment could come under more pressure for demolition. As such this resulted in mixed effects. The remaining housing policies, relating mainly to new builds, would have neutral effect.

In proactively promoting development the city's built heritage would be protected and enhanced through the careful stewardship of the built environment, resulting in minor positive effects. A balanced approach would again ensure that none of the three pillars of sustainable development is promoted over the others. Retaining the built environment and promoting the refurbishment and re-use of existing buildings can also help retain the city's distinctive character and attractiveness. However, and notwithstanding the potential to enhance a sense of place through the adaptation and reuse of historic buildings, it is noted that development pressure for new builds may result in some loss of built heritage, thus mixed effects are recorded.

The provision of essential services may have some negative impacts on the historic environment and heritage assets.

Significant positive effects were again noted for the draft trees policy due to their positive benefits for built heritage settings. Minor positive effects would also be achieved through the protection and improvement of landscape quality and the environment, which also affects the townscape quality.

## Likely Significant Effects – Key Findings

### SA13: Protect, maintain and enhance the quality of Belfast’s distinctive landscape and geodiversity

The draft built heritage policies would help protect historic buildings that contribute to Belfast’s landscape setting and are likely to have significant positive effects. Similar effects would also be achieved through the retention of archaeology sites, conservation areas, ATC’s and parks, gardens and demesnes that contribute to landscape setting, geodiversity and historic character. Minor positive effects are also expected as the proposed growth is capable of being accommodated within the existing urban footprint, preventing pressure on sensitive landscapes and geodiversity.

Protection and enhancement of the city’s distinctive landscape setting and geodiversity is an important element within the context of sustainable development, and the balanced approach of the plan will have minor positive effects. Recognising the landscape and geodiversity as a distinctive tourism asset will also have minor positive effects.

Waste infrastructure has the potential to have minor negative effects on landscape quality due to size and nature of the facilities.

Enhancing the quality of green assets, open spaces, important landscapes and the setting of the city in general will have significant positive effects. Protecting and improving the natural environment and the countryside will have minor positive effects.

### SA14: Protect and enhance open space and natural greenspace including Belfast’s countryside asset

The proposed design, community cohesion and interface area policies would result in minor positive effects on green space and countryside. It is also noted that provision of housing and affordable housing within the development limits, along with higher densities and a focus on brownfield development, can offset the pressure for development on green spaces and in rural areas. The presence of small settlements should ensure that rural housing need can be met without recourse to the open countryside, which would be a minor positive effect. However, whilst pressure on the countryside should be minimised, some brownfield sites that have re-colonised as green space may come under pressure to be redeveloped, which would have mixed effects.

The city centre first policy approach focuses on existing brown field sites and recognises that open and green spaces are an important asset, which will have a significant positive effect. Minor positive effects are also identified through the balanced approach to delivering sustainable development, which reflects the importance of protecting and enhancing open spaces, green spaces and the countryside.

Waste infrastructure again has the potential for minor negative effects on the countryside due to size and nature of the facilities.

Enhancing the quality of green assets, open spaces, important landscapes and the countryside around the city will have significant positive effects. Protecting and improving open space, the natural environment and the countryside will have minor positive effects.

## Likely Significant Effects – Key Findings

### SA15: Promote the sustainable management of waste

Significant positive effects would result from draft policies on density and residential design, as higher densities alongside well designed and integrated new housing can assist in more sustainable waste management. Whilst increased growth will lead to an increase in waste, which would have minor negative effects, minor positive effects are identified as the waste arising from the proposed growth can be accommodated within existing infrastructure.

Supporting the reduction of waste will have minor positive effects. Again, whilst minor negative effects are noted as population and economic growth will increase the amount of waste generated, this can be mitigated with the reuse of existing buildings to minimise construction waste, and the provision of recycling facilities to promote a circular economy approach to reuse, recycle and minimise waste.

Facilitating an increased resource efficiency and a shift to the circular economy will have significant positive effects. This will be further supported by mitigation against environmental change, including the promotion of recycling and the circular economy.

The green and active policies generally have no effects on this objective.

### SA16: Promote the quality, efficient use of water resources

Belfast has a healthy supply of water, so this is not considered to be an issue for growth. Similarly, the economic growth is not envisaged to include heavy industry that would require significant volumes of water usage. Supporting priority brownfield development and factoring in a windfall allowance would require less new infrastructure, and with concentration of population within the urban footprint, it is cost effective. However, there are capacity issues with the existing Waste Water Treatment (WWT) facilities in Belfast, which could prove to be a risk in the short term, and subsequently both uncertain and mixed effects are noted for this reason. Likewise, whilst development could be facilitated within the existing urban footprint, the locations of interface areas are fixed and there may be infrastructure implications, so mixed effects are again identified.

For the same reasons above relating to the WWT capacity issues, effective management of infrastructure throughout the plan period will be required as development progresses to ensure quality and efficiency is maintained in the long term. Economic effects are therefore also likely to be mixed, in particular as an increase in economic development will produce more wastewater, which could potentially exceed the existing WWT capacity if it is not managed efficiently throughout the plan period.

Facilitating infrastructure to encourage better quality and efficient use of water will have significant positive effects. This is further supported through the promotion of water quality protection and reduction of carbon emissions.

Protecting and improving the quality of the natural environment, in particular the benefits of trees for water quality, has resulted in both significant and minor positives under this objective.

## Likely Significant Effects – Key Findings

### SA17: Reduce air pollution and ensure continued improvements to air quality

The potential to address peace walls and create or renew access to neighbouring areas, in order to promote connectivity and enhance permeability, will help to reconnect the city and would have significant positive effects. The consequential benefits of this include reduced commuting distances and improved linkages between different areas, reducing the need to travel further by vehicle and encouraging travel by foot or bicycle. This would also assist in improving air quality.

Accommodating people and jobs within the city will reduce travel distances and have a minor positive effect on air quality. In addition, new economic development continues to embrace clean green technologies and is compatible with an increasingly digital economy. Better integration of land use planning and transportation through the city corridors, reducing the need to travel and encouraging more sustainable travel options, will help to reduce air pollution associated with the private car and also result in minor positive effects. Restricting uses in retail warehousing sites may help to minimise the number of car journeys.

Supporting the requirement for new development sites to be highly accessible to public transport, within easy walking and cycling distance that could help to reduce air pollution, will have minor positive effects. This also reduces emissions from less sustainable modes of transport. Increased economic development does however have the potential to increase the number of cars travelling into the city and is therefore identified as a mixed effect. Overall, however, improved accessibility and reducing the need to travel will have significant positive effects; reducing emissions and pollution to improve air quality through modal shift.

Significant positive effects are again identified for the Green and Blue Network and draft trees policy, due to their positive benefits through ecosystem services. Further minor positive effects are noted through the general protection and improvement of open space and the natural environment, which have subsequent positive effects on air quality.

### SA18: Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy

Significant positive effects are identified as higher densities means more compact cities, reducing the need to travel and thereby helping to reduce emissions and support a shift to a lower carbon economy. Delivering an increased population whilst maintaining a compact urban form will ensure residents are located close to places of work, encouraging more sustainable travel modes than the private car, which will make minor positive contributions to the aim of a low carbon economy. In the absence of knowing where new housing will be located, at this stage there are uncertain effects in terms of affordable housing, housing mix and accessible/adaptable accommodation.

Significant positives are identified as comprehensive, sustainable mixed-use schemes will promote working and living in the city centre, walking and cycling, and district heating from renewable energy which will support the

### Likely Significant Effects – Key Findings

transition to a low carbon economy. Supporting the requirement for new development sites to be highly accessible to public transport, and within easy walking and cycling distance, could help to reduce greenhouse gas emissions, thus having minor positive effects. Minimising car journeys and promotion of sustainable travel will reduce emissions, whilst supporting sustainable development will promote renewable energy and passive design solutions, reducing greenhouse gas emissions and supporting the transition to a low carbon economy. Mixed effects are noted where increased economic development may increase the number of cars travelling into the city, prompting an increase in emissions. The positive effects under this objective could be further enhanced by ensuring that new economic development can employ new technology that makes a positive contribution to the transition to a low carbon economy.

Improving accessibility and reducing the need to travel will have significant positive effects, as will facilitation of renewable energy schemes and a shift towards a circular economy.

The Green and Blue Network and trees policies will have significant positive effects due to their positive benefits through ecosystem services. Elsewhere, protection and improvement of the natural environment and encouraging more active travel will have minor positive effects on reducing greenhouse gas emissions.

### SA19: Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk

Mixed effects are noted as increased development could lead to increased risk of flooding, although this could be partially offset through use of more sustainable construction methods and flood risk mitigation. Many brownfield sites will be at flood risk and require further assessment at application stage. Also, taking windfall housing in isolation (i.e., in the absence of higher densities etc.) would mean that more development land would be required, thereby increasing flood risk. Mixed effects are again identified for these reasons. As the impact on flood risk will depend on the location of individual developments, which is unknown at present, uncertain effects are also noted.

Encouraging more energy efficient design and sustainable travel modes of travel through better integration of public transport, walking and cycling routes will have minor positive effects. This would contribute positively to climate change goals through a reduction in greenhouse gas emissions to help mitigate climate change. The integration of a blue and green infrastructure network would also help to mitigate potential flood risk. Policy support for sustainable economic development and enhanced connectivity may help to mitigate and adapt to climate change, bringing minor positive effects. Mixed effects were noted due to the potential for more hardstanding with greater run-off and surface water flooding. However, a green and blue infrastructure network could help to mitigate the impact.

Improved accessibility and reducing the need to travel will have significant positive effects, as will promoting active travel, reducing air pollution caused by motorised traffic, encouraging environmental change and seeking to ensure a resilient city.



### Likely Significant Effects – Key Findings

As with previous objectives, the positive ecosystem services benefits of the Green and Blue Network and trees policies will have significant positive effects. Minor positives will also be achieved through protecting and improving the natural environment and promoting of active travel; all of which have positive effects on greenhouse gas emissions and climate change.

**Table 23: Key Findings for Environmental Objectives**

## 5.5 Total and cumulative effects

### Total effects

- 5.5.1 **Tables 24 to 29** show the total effects matrices for each topic and theme. **Appendix 11** sets out methodologies to show how these were calculated and scored.

### Cumulative, secondary and synergistic effects

- 5.5.2 **Table 30** presents the cumulative, secondary and synergistic effects of the Draft Plan Strategy. Where more than one cumulative effect has been identified under a specific sustainability issue, the potential changes are appraised and consolidated to understand the overall, potential cumulative effect.

STRATEGY	POLICY	Social						Economic			Environmental									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
STRATEGIC POLICIES	SP1	++	+	+	o	o	++	++	+	+	-	+	++	+	+/-	+	+/-	+	+	+/-
	SP2	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	+/-	+	+	+
	SP3	Appraised under Shaping a Liveable Place draft Policy HC1																		
	SP4	+	+	++	+	?	?	?	+	?	o	o	o	o	o	o	o	o	o	o
	SP5	++	++	+	+	o	+	+	+	+	+	o	+	+	+	o	o	+	+	+
	SP6	Appraised under a Smart, Connected, Resilient Place draft Policies ENV2 & ENV3																		
	SP7	++	++	+	o	o	+	+	++	++	o	o	+	o	o	o	o	++	++	++
	SP8	Appraised under a Green and Active Place draft Policy GB1																		

Table 24: Total Effects for Strategic Policies

STRATEGY	POLICY	Social						Economic			Environmental									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SPATIAL DEVELOPMENT	SD1	o	o	+	o	o	+	o	+	o	o	o	o	o	+	o	o	o	o	o
	SD2	++	+	o	o	o	+	+	o	++	o	o	o	o	o	o	o	+	+	?
	SD3	++	++	++	+	+	++	++	++	++	+	+	+	+	+	-	+/-	+	++	+

Table 25: Total Effects for Spatial Development Policies

STRATEGY	POLICY	Social						Economic			Environmental										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
SHAPING A LIVEABLE PLACE	HOU1	o	o	++	o	o	o	o	++	o	o	o	o	o	o	+	+	o	o	+	
	HOU2	+	+	+	?	o	+	+	+	+	+	+	+/-	+	+	+	?	+	+	+/-	
	HOU3	+	+	++	?	+	+	+	+	+	+	+	o	+	+	+	+	+	+	+	
	HOU4	+	+	+	+	o	++	++	++	++	+	+	o	+	+	++	++	+	++	+	
	HOU5	++	++	++	+	o	?	?	++	?	o	o	o	o	o	o	o	o	o	?	o
	HOU6	+	+	++	?	o	o	o	+	o	?	?	o	o	o	o	o	?	?	?	?
	HOU7	++	++	++	+	+	+	+	+	?	o	o	o	o	o	o	o	o	o	?	o
	HOU8	+	+	+	+	+	++	+	+	+	+	o	o	+	+	o	o	o	o	+	o
	HOU9	+	+	++	?	+	+	+	+	+	+	o	o	+	+	+	+	+	+	+	+
	HOU10	+	+	+	+	+	o	o	o	o	o	o	o	o	o	+	o	o	o	o	o
	HOU11	?	?	+	+	+	+	+	+	+	o	o	o	o	o	o	o	o	+	+	+/-
	HOU12	+	+	++	++	+	+	+	+	+	o	o	o	o	o	o	o	o	+	+	+/-
	HOU13	o	+	++	?	o	+	+	++	++	o	o	o	o	o	+	+	+	+	+	+
	DES1	+	+	+	+	o	+	+	+	+	+	o	++	+	+	+	+	o	+	o	o
	DES2	+	+	+	+	o	+	+	+	+	+	o	+	+	+	+	+	+	+	+	+
	DES3	+	o	?	o	o	+	+	+	++	o	o	+	+	+	o	o	+	o	o	o
	DES4	+	o	o	o	o	+	o	+	o	o	o	+	o	o	o	o	o	o	o	o
	RD1	+	++	++	++	+	+	+	++	++	+	o	+	+	+	++	o	+	+	+	+
	RD2	+	++	++	++	+	+	+	++	++	+	o	+	+	+	++	o	+	+	+	+
	RD3	+	++	++	+	++	++	++	++	+	+	o	+	+	+	+	o	+	+	+	+
	BH1	+	+	+	o	+	o	o	+	o	o	o	++	++	o	o	o	o	o	o	o
	BH2	+	+	+	o	+	o	o	+	o	+	o	++	++	+	o	o	o	o	+	+
	BH3	+	+	+	o	+	o	o	+	o	+	o	++	++	o	o	o	o	o	+	+
	BH4	+	+	o	+	o	o	o	+	o	+	o	+	+	+	o	o	o	o	o	o
BH5	o	o	o	o	o	o	o	o	o	o	o	++	++	o	o	o	o	o	o	o	
BH6	o	+	o	o	+	o	o	+	o	++	+	++	++	++	o	o	+	o	+	+	
CGR1	++	++	++	++	++	++	++	++	++	o	o	+	o	++	o	o	++	+	+	+	

STRATEGY	POLICY	Social						Economic			Environmental									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	CGR2	++	++	0	++	0	+	++	++	+	0	+	+	0	+	0	+/-	0	0	0
	HC1	+	++	+	+	0	+	+	+	0	0	0	0	+	0	0	+	+	+	
	CI1	+	+	+	+	+	++	+	+	+	0	0	0	0	0	0	+	+	+	
	CI2	+	+	0	0	0	+	0	+	0	0	0	+	+	+	0	0	0	0	

Table 26: Total Effects for Shaping a Liveable Place Policies

STRATEGY	POLICY	Social						Economic			Environmental									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
CREATING A VIBRANT ECONOMY	EC1	++	++	0	0	+	0	++	++	+	0	+	+/-	0	0	-	+/-	+/-	+/-	0
	EC2	++	++	+	0	0	+	++	++	+	0	+	+/-	0	0	-	+/-	+	+	0
	EC3	++	++	0	0	0	0	++	++	+	0	+	+/-	0	0	-	+/-	+	+	+/-
	EC4	++	+	0	0	0	0	++	++	+	0	+	+/-	0	0	-	+/-	+	+	+
	EC5	++	++	0	+	0	+	++	++	+	0	+	+/-	0	0	-	+/-	+	+	0
	EC6	++	++	0	+	0	0	++	++	+	0	+	+/-	0	0	-	+/-	+	+	+/-
	EC7	++	++	0	+	++	+	++	++	+	0	+	+/-	0	0	-	+/-	+	+	+/-
	RET1	++	++	0	+	0	++	+	++	+	0	+	+	0	++	0	+/-	+	+	+
	RET2	+	+	+	+	0	+	+	++	++	0	+	+/-	0	+	0	+/-	+	+	+
	RET3	+	+	0	+	0	++	+	++	+	0	+	+	0	+	+	+/-	+	+	+
	RET4	+	+	+	+	0	+	+	++	++	0	+	0	0	+	0	+/-	++	+	+
	RET5	+	+	0	+	0	+	+	++	++	0	0	0	0	+	+	+	+	+	+
	RET6	+	+	0	+	?	0	+	+	+	0	+	++	0	0	0	0	?	0	0
	CC1	++	++	++	+	0	+	++	++	+	0	+	++	0	+	-	+/-	+	++	+
	TLC1	++	+	0	+	0	+	++	++	+	+/-	+/-	+	+	+	-	+/-	+	+	+
	TLC2	++	++	0	0	0	+	++	+	0	+	0	+	+	+	0	0	0	0	0
	TLC3	++	++	0	0	0	0	++	++	0	+	+	+/-	+	+	-	+/-	+	+	+
TLC4	++	++	0	+	0	++	++	++	0	+	+	+	+	+	-	+/-	+	+	+	

Table 27: Total Effects for Creating a Vibrant Economy Policies

STRATEGY	POLICY	Social						Economic			Environmental										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
BUILDING A SMART, CONNECTED, RESILIENT PLACE	ITU1	+	+	0	0	+	+	++	++	+	0	0	+/-	++	+/-	0	0	+	+	+	
	ITU2	+	+	++	0	0	0	0	+	0	+/-	+	-	-	+/-	+	++	0	+	+	
	ITU3	+	+	+	+	++	0	0	+	0	-	0	-	-	-	0	0	0	0	0	
	ITU4	+	+	+	0	0	0	0	++	0	+	+	+/-	+	+	++	0	+	++	+	
	W1	0	+	+	0	0	+	+	+	+	-	+	0	-	-	++	-	+	++	+	
	W2	+	+	+	0	0	+	+	+	+	-	0	0	-	-	++	0	0	+	+	
	W3	0	0	0	0	0	0	+	+	0	-	-	0	-	-	0	0	0	0	0	
	W4	0	0	0	0	0	0	0	0	0	-	0	0	-	-	+	0	0	0	0	
	W5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+/-	0	0	
	M1	0	0	0	0	0	0	0	+	+	+	+	-	+	-	+	+	0	0	0	
	TRAN1	++	++	+	+	0	+	+	++	++	+	+	+	0	+	0	0	++	++	++	
	TRAN2	++	++	++	0	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	
	TRAN3	++	++	+	+	0	+	+	+	++	+	0	0	0	0	0	0	+	+	+	
	TRAN4	++	++	+	+	0	+	+	+	++	0	0	0	0	0	0	0	+	+	+	
	TRAN5	++	++	0	+	0	+	+	+	++	0	0	0	0	0	0	0	+	+	+	
	TRAN6	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	TRAN7	0	+	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	
	TRAN8	+	+	0	0	0	0	+	+	+	0	0	0	0	0	0	0	+	+	+	
	TRAN9	+	++	+	+	0	0	0	+	+	0	0	0	0	0	0	0	+	+	+	
	TRAN10	0	0	0	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	
	TRAN11	+	+	0	+	0	0	0	+	++	0	0	0	0	0	0	0	+	+	+	
	TRAN12	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	+	+	
	ENV1	++	++	++	++	0	0	0	+	+	+	+	+	+	+	0	++	++	+	+	
	ENV2	+	+	+	0	0	+	+	++	++	+	+	+	+	+	++	++	++	++	+	
ENV3	+	+	+	0	0	0	0	+	+	++	+	+	+	++	0	+	+	++	++		
ENV4	+	+	+	0	0	0	0	++	0	+	+	+	+	+	0	+	0	0	++		
ENV5	+	+	+	0	0	0	0	++	0	+	+	+	+	+	0	+	0	0	++		

Table 28: Total Effects for Building a Smart, Connected, Resilient Place Policies

STRATEGY	POLICY	Social						Economic			Environmental										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
PROMOTING A GREEN & ACTIVE PLACE	GB1	++	++	++	++	0	+	+	++	++	++	+	+	+	++	0	+	++	++	++	
	OS1	+	++	+	+	0	0	0	+	+	+	+	+	+	++	0	+	+	+	+	
	OS2	+	++	+	+	0	0	0	+	+	+	+	+	+	++	0	+	+	+	+	
	OS3	+	++	+	+	0	0	0	+	+	+	+	+	+	++	0	+	+	+	+	
	OS4	+	++	0	+	0	0	0	+	-	0	0	0	0	++	0	0	0	0	0	
	OS5	+	++	+	+	0	0	0	+	+	0	0	0	0	0	0	0	0	+	+	0
	OS6	+	++	+	+	0	0	0	+	0	+	0	0	0	+	0	+	0	0	0	
	OS7	+	++	+	+	0	0	0	+	0	+	0	0	0	+	0	0	0	0	0	
	NH1	+	+	+	0	0	0	0	+	0	++	+	0	+	+	0	+	+	+	+	
	TRE1	+	++	++	0	0	0	0	++	0	++	++	++	++	++	++	0	++	++	++	++
	LC1	0	0	0	0	0	0	0	+	+	+	+	+	++	++	0	+	+	+	+	
	LC2	0	0	0	0	0	0	0	+	+	+	+	+	++	++	0	+	+	+	+	
	LC3	0	0	0	0	0	0	0	+	+	+	+	+	++	++	0	+	+	+	+	
	LC4	0	0	0	0	0	0	0	+	+	+	+	+	++	++	0	+	+	+	+	
	DC1	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC2	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC3	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC4	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC5	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC6	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC7	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC8	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC9	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
	DC10	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+	
DC11	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+		
DC12	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+		
DC13	+	0	+	0	0	0	0	+	+/-	+	+	+	+	+	0	+	+	+	+		

Table 29: Total Effects for Promoting Green and Active Place Policies

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<b>SOCIAL OBJECTIVES</b>		
1. Reduce deprivation and encourage an inclusive and equal society	++	The provision of quality housing, with an improved, more competitive city supported by quality infrastructure and greater employment opportunities, together with a healthy, green and active environment should help to reduce deprivation for all and promote equality in society. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be significantly positive.</b>
2. Improve health and wellbeing for an improved quality of life.	++	As for SA1, where the policies of the draft plan cumulatively would have a significant positive effect, this would improve the general health and well-being of the population for improved quality of life. Also considered to have significant positive effects. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be significantly positive.</b>
3. To provide opportunity for good quality housing & enable people to meet their housing needs	++ ↑ Increased Significance	HOU1, in setting out housing requirements, would have a significant contribution to make towards the provision of new housing over the plan period.  Aside from HOU1, which seeks the provision of 31,600 new homes to grow the city, draft policies HOU2, HOU3, HOU4, HOU5 and HOU6 in particular have the potential to create a synergistic effect; reinforcing a significant positive effect on SA Objective 3 over the lifetime of the Plan. <b>Whilst this will not change the overall score, the significance of the positive effects should increase over time as a result.</b>
4. Increase community safety by supporting the reduction of crime & antisocial behaviour	++	Community safety should be improved as a result of the DPS policies and therefore the plan would have mostly minor positive effects.  Taking policies HOU5, CGR1, CGR2 together has to potential to have a synergistic effect on SA Objective 4. The provision of good quality housing, together with enhanced good relations and the redevelopment of contested spaces, can make people happier, less fearful about crime and reduce instances of disturbance, intimidation and antisocial behaviour. <b>Such effect is considered to increase the overall cumulative effect from minor to significant positive.</b>
5. To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities	++	One of the measurements of deprivation is educational attainment. Through improved housing, provision of affordable housing, a better environment, a more liveable place, improved accessibility and more job opportunities, people would be considered more likely to avail of educational and training opportunities. Such opportunities are also likely to increase through the growth of the city, which is the foundation of the LDP. As a suite of policies therefore, the DPS would be considered to have synergistic cumulative effects in helping more people to attain the skills and education that will assist them throughout their lives. <b>The overall cumulative effect is therefore considered to increase from minor to significant positive.</b>



SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
6. Retain & enhance access to local services & facilities	<p>++ ↑ Increased Significance</p>	<p>HOU4, RD3, CGR1 and CGR2 would have a significant contribution in terms of ensuring access to local services and facilities.</p> <p>Additional policies HOU3, HOU8, HOU9, HOU12, HOU13, HC1 and CI1 could create a synergistic effect, reinforcing a significant positive effect on SA Objective 6 over the lifetime of the plan. <b>Again, whilst this will not change the overall score, the significance of the beneficial effects should increase over time.</b></p>
<b>ECONOMIC OBJECTIVES</b>		
7. To ensure local residents have access to employment opportunities: Individual issues	<p>++ ↑ Increased Significance</p>	<p>Similar to SA Objective 6 above, where a policy would retain and enhance access to local services and facilities, it will also provide access to employment opportunities.</p> <p>Various housing, urban design, community cohesion and community infrastructure policies, when taken together have the potential to have a synergistic positive effect on SA Objective 7. Specifically, policies HOU4, HOU8, RD3, CGR1, CGR2 and CI1 will be of benefit in providing access to employment opportunities; <b>therefore, the overall cumulative effect is considered to increase from minor to significant positive.</b></p>
	<p>?</p>	<p>The Plan Strategy is promoting inclusive employment growth through the provision of a range of jobs at different skills level within defined economic sectors over the Plan Period. This is to support the Belfast's Agenda target to secure 46,000 additional jobs by 2035.</p> <p>Government policy for Brexit has the potential to synergistically <b>reduce the overall effect from significant positive to unknown</b>. The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities leading to reduced inclusive employment creation.</p> <p>Likewise potential currency fluctuations due to Brexit may deter or reduce tourism numbers; and the levels of predicted out-of-state expenditure may not be achieved to meet the Belfast target of £500m by 2021.</p>
7. To ensure local residents have access to employment opportunities: Consolidated issues	<p>+</p>	<p>Consolidating the cumulative effects identified above for SA objective 7 and taking consideration of the specific reasons affecting each score, the cumulative effects for this sustainability issue are considered <b>to reduce from significant to minor positive.</b></p>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<p>8. Support the economic development of Belfast as a competitive place &amp; contribute to Belfast's roles as a regional economic driver</p>	<p>?</p>	<p>The Draft Plan Strategy seeks to ensure sufficient land is available to support the growth of defined economic sectors. This will encourage and promote innovation and the knowledge economy, enabling Belfast to be a competitive city that attracts businesses and talent. This reflects and supports the Belfast's Agenda target to secure 46,000 additional jobs by 2035.</p> <p>Government policy for Brexit again has the potential to synergistically reduce the overall effect. The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities, leading to reduced business creation and foreign direct investment.</p> <p>There is also a possible synergistic effect due to the proposed Belfast Transportation Plan which is being prepared by the Department for Infrastructure. There is a risk that this may not adequately plan for sustainable travel, and to mitigate the potential increase in private car commuting due to the LDP's proposed level of economic growth, which predicts to secure 46,000 additional jobs by 2035. This would significantly affect the ability to achieve positive effects under the objective, as demand for parking spaces may increase, which could subsequently erode available land required for economic growth.</p> <p>There is also the potential for secondary, indirect effects of increasing greenhouse gas emissions; compromising the city's ability to mitigate climate change and air pollution that would negatively impact the health of people living and working in Belfast.</p> <p>The lack of an Executive to make strategic economic decisions concerning funding for economic investment and infrastructure development may also have a significant synergistic effect on the ability to deliver the objectives and targets of both the LDP and Belfast Agenda.</p> <p><b>Given that we do not yet know the extent that these influencing factors may have on any impact, the cumulative score is concluded to be uncertain.</b></p>
<p>9. Promote an integrated transport system &amp; encourage sustainable travel: Individual issues</p>	<p>++</p>	<p>The Draft Plan Strategy is considered to have an overall minor positive effect on SA objective 9.</p> <p>Locational aspects of housing policies including HOU4, HOU8, HOU9 and HOU12; principles within urban design policies DES1, DES2, and RD1; together with improved community cohesion and good relations (CGR1); have the potential to create a positive synergistic effect on SA Objective 9 by improving accessibility and connectivity and encouraging greater levels of sustainable travel. <b>The overall cumulative effect is therefore considered to increase from minor to significant positive.</b></p>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
	-	<p>The proposed TRAN policies will have positive effects as they seek to develop an integrated transport system and more sustainable travel. However, the LDP objectives of increased growth in population and jobs in the city have the potential to create an indirect negative effective through greater demand for travel. This could neutralise the policies to facilitate and promote active travel and sustainable modes of transport, subsequently <b>reducing the effect from minor positive to minor negative</b>.</p>
	+	<p>On the other hand, the Department for Infrastructure’s revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. <b>In such a scenario the minor positive effect would be retained overall.</b></p>
	?	<p><b>Given that we do not yet know to what extent the Department’s plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.</b></p>
<p>9. Promote an integrated transport system &amp; encourage sustainable travel:                      Consolidated issues</p>	+	<p><b>Consolidating the cumulative significant positive and unknown effects above, and taking consideration of the specific reasons affecting each, the overall cumulative effects for SA objective 9 are considered to remain as minor positive.</b></p>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<b>ENVIRONMENTAL OBJECTIVES</b>		
Consolidated Environmental Objectives: 10. Biodiversity 11. Soil Quality 12. Historic Assets 13. Landscape 14. Open space 16. Water Resources 17. Air Quality 18. Low carbon 19. Climate Change	+	<p>The plan's growth strategy, which sees a significant rise in population over the plan period, will inevitably add pressure for additional housing land. Whilst much of this will be directed at inner city and brownfield sites, some sites may have an impact on undeveloped land and biodiversity, which has the potential to affect the green and active objectives generally. Nonetheless the draft policy approach seeks to ensure a sustainable approach and meet the environmental objectives. The plan's growth strategy is based on sustainable growth, maintaining a compact urban form, seeking to increase densities, reducing the need to travel and facilitating sustainable travel modes. These policy approaches, taken together, should ensure that the development strategy and future growth is sustainable and does not prejudice or undermine the environmental objectives, including the objectives around climate change, greenhouse gas emissions and resilience.</p> <p>Many of the green &amp; active policies are in accordance with national planning policy and other existing statutory requirements. These include meeting our obligations in terms of natural heritage, biodiversity, water quality and climate change. In this regard, the draft policies help to secure the statutory and agreed policy approach, insofar as the LDP, as a land use planning tool, can assist in meeting these overall aims and objectives. The plans and programmes of others, including government departments and state agencies, are also set within the same overall macro-policy and regulatory framework. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be minor positive.</b></p>
15. Promote the sustainable management of waste	-/+	<p>Population growth will likely have an indirect effect leading to a direct increase in waste generation. Policies to move towards reduce, reuse and recycling and technological advances will aim to neutralise this over the plan period, however; there may still be a minor negative cumulative effect in the short term until such times as sufficient infrastructure and services are developed and implemented in the plan area.</p> <p>Synergistic effects are possible between HOU2, HOU4, RD1 and RD2, in that they can combine to work towards a compact, sustainable city with well-integrated and designed developments that can make waste management easier and more efficient. <b>The overall cumulative effect therefore has the potential to increase to minor positive in the longer term.</b></p>

**Table 30: Cumulative, Secondary & Synergistic Effects of the Draft Plan Strategy**

## 5.6 Limitations and difficulties encountered

5.6.1 As was the case with the scoping and Interim SA stages, a number of limitations and difficulties were encountered when undertaking the SA of the policy options and reasonable alternatives for the Draft Plan Strategy. Some of the key examples of where this occurred are summarised below.

### Housing

5.6.2 Owing to the unique nature of the plan process, the strategic policies are effectively divorced from the locational aspect. This means that assessment of some social and economic effects has been restricted at DPS stage.

5.6.3 The effects of Policy HOU5 (affordable housing), for example, remain unknown or uncertain in terms of access to local services and facilities, access to employment opportunities, and promotion of integrated transport and sustainable travel. These aspects cannot be fully assessed until such times when assessing and prioritising sites to be zoned for housing at LPP stage. Likewise, assessment of many of the environmental aspects is not fully possible at this stage and will need to be considered in more detail where the specific zoning of sites will be progressed. In addition to locational uncertainties, in the absence of knowing what market conditions may be like in the future, it is not possible to fully determine environmental effects in terms of housing mix (Policy HOU6).

5.6.4 Whilst these aspects could still be an issue at LPP stage, there may be more up-to-date data available or supplementary guidance at a later date. Furthermore, as the plan seeks in a general sense to protect environmental assets and deliver housing through increased density, re-use of previously developed land and without a need for any major expansion of the settlement limits; it is reasonable to assume that any potential environmental harm can be adequately mitigated through the allocation of appropriate land.

## **Economy**

- 5.6.5 A number of difficulties encountered during the scoping and evidence gathering stages had consequential impacts on the appraisal of preferred options both at POP and DPS stage. This included a lack of up-to-date data, poor or limited records, continuous changes in retail and shopping patterns, and ongoing variation of data sets and indicators from statistical sources. The amount of relevant data available from before the recent reform of local government was also limited for various aspects.
- 5.6.6 Whilst these issues were not specifically unique to the DPS, such challenges had a collective impact across all SA stages. In response, we devoted additional in-house resources, efforts and time spent monitoring, surveying and gathering data; we engaged more closely with colleagues through cross-council partnerships; and enlisted the expertise of external consultants and commissioned studies where required.

## **Sustainable transport**

- 5.6.7 As there is currently no up-to-date transport plan for Belfast, the Draft Plan Strategy must rely on transport policies from draft BMAP in relation to areas of parking restraint and parking standards reflected in the interim proposals map. This will be updated at a later stage as and when further detailed information becomes available.

## **Urban design**

- 5.6.8 Limitations for urban design policies occurred as although thresholds have been introduced for major applications (DES2) and tall buildings (DES3) within the city, the overall impact of these changes on the SA is minimal as high-quality design remains the overall aspiration.
- 5.6.9 Difficulties were also encountered in the early stages of drafting policy DES3 when gathering up to date and relevant information regarding tall

buildings, whilst available secondary data was significantly limited. This required undertaking time-consuming desk top research to establish city building heights, which could in turn support an appropriate draft policy and presentation to working group members. Further analysis of current guidance on building heights outlined within draft BMAP character areas was limited, as the council's access to online records was limited to reports, which justified compliance or deviation from the height guidance, from 2010 onwards.

- 5.6.10 As we progressed through the process, we were able to access more accurate information utilising 3D modelling, which measured building heights from Above Ordinance Data. Whilst changes in topography limits the accuracy of the data, the model allowed for a higher degree of certainty when compared with the previous data collected. As a direct result of this, the proposed threshold was adjusted accordingly.

### **Environmental protection and heritage**

- 5.6.11 With particular reference to many of the draft policies on environmental protection and heritage policies, there were no alternative options as the LDP requires to be consistent with extant national and regional planning and environmental policy.
- 5.6.12 In addition, the allocation of timeframes raised some difficulties due to the interaction of many different factors and the limitations of the LDP in effecting change. As the LDP is a framework against which planning applications will be assessed, and not a programme or action plan, it cannot ensure the coming forward of proposals and the physical delivery of development. However, what it can do is ensure that development that is given permission is sustainable – however, this may or may not ultimately be implemented.
- 5.6.13 These difficulties are particularly the case in relation to the draft policies on mitigating and adapting to environmental change, largely due to the

multiple influencing factors and the scope of land use planning policy. Nevertheless, the assessment has been undertaken and possible timeframes indicated, based on the best available information and professional judgement.

## **5.7 Cross border and spatial effects**

5.7.1 Under the provisions of the SEA Directive, the appraisal must also consider whether a plan or programme is likely to have any significant adverse transboundary effects on the environment of another EU Member State.

5.7.2 In this instance, the Belfast LDP boundary does not border any Member State. Furthermore, and following full consideration of all scoping information and appraisal of the Draft Plan Strategy aims, objectives and policies; the council is satisfied that there is not likely to be any significant adverse transboundary effects on the environment of the Republic of Ireland or any other Member State. As a result, formal transboundary consultation at Government level is not anticipated.

## **5.8 Mitigation and enhancement**

5.8.1 Mitigation of significant negative effects and enhancement of positive effects are a key element of the SA and have been identified within our main appraisal. Mitigation can include changes to policy wording, deleting or adding new policies, and the identification and choice of sustainable alternatives.

5.8.2 When undertaking the appraisal of all policy options, in addition to identification of potential effects we also clarified where mitigation or enhancement measures may be introduced or undertaken in response. Each narrative table presented in resented in **Appendix 11** includes a specific Mitigation and Enhancement column to highlight where these were identified.



5.8.3 **Tables 31** and **32** provide an overarching summary of the key mitigation measures identified in the narrative tables and are presented under the main topic headings. Following this, **Impact Box 9** explains how identifying these measures, and the issues from which they derive, have influenced our decision making and preparation of the LDP within the wider SA process.

TOPIC ↓	PROPOSED MITIGATION & ENHANCEMENT
<b>STRATEGIC POLICIES</b>	
<b>Growth</b>	<ul style="list-style-type: none"> <li>Land and sites should be allocated and prioritised to minimise distances between resident population and their places of work. Key site requirements should be applied to protect valuable assets and avoid impacts on biodiversity, whilst flood risk implication, mitigation and sustainable construction methods should be considered. All the above, including the allocation of sites, will be dealt with at the Local Policies Plan stage and in the future assessment of planning applications. In any event, the mitigation and enhancement measures are supported by LDP draft strategic policies SP1 Growth, SP2 Sustainable Development, SP5 Positive Placemaking, SP6 Environmental resilience, SP7 Connectivity, and SP8 Green and blue infrastructure network across the plan area. The mitigation and enhancement benefits would be obtained in the medium to long-term period, subject to partnership delivery and funding.</li> <li>Effective infrastructure investment management in line with development is required to offset the medium to long term wastewater treatment capacity issues. This is supported by LDP draft strategic policy SP1 Growth through co-ordinated site releases to mitigate impact during the plan period. The mitigation and enhancement benefits could be obtained in the medium to long term period, subject to DfI plans for upgrading the infrastructure required for growth.</li> <li>The LDP draft strategic policy SP6 environmental resilience would facilitate new economic development that mitigates the effects of climate change, to enhance the City's transition to a low carbon economy over the long term of the plan period and beyond.</li> </ul>
<b>Sustainable development</b>	<ul style="list-style-type: none"> <li>Mitigation and enhancement measures should be applied over the plan period when promoting sustainable development, designating land to reduce travel distances, between neighbourhoods and employment opportunities; to minimise impacts on biodiversity, geodiversity and flood risk. The LDP draft strategic policy SP2 supports sustainable development to balance economic and social growth with the protection and enhancement of wider environmental interests. The mitigation and enhancement benefits would be obtained in the medium to long term of the plan period.</li> <li>Provision should be made for delivery of the green and blue infrastructure network to integrate the built and natural environment that would help mitigate impacts on social, economic and environmental factors. This is incorporated in the LDP draft strategic policy SP8 to plan for a green and blue infrastructure network across the plan area. The mitigation and enhancement benefits would be obtained in the medium to long term period, subject to partnership delivery and funding.</li> </ul>
<b>Connectivity</b>	<ul style="list-style-type: none"> <li>Integration of land use and transport should be supported by mitigation measures to manage travel demand and encourage use of sustainable modes. This is supported by LDP draft strategic policy SP7 Connectivity. This policy will inform the decision-making process and where appropriate will advise travel plans. Sustainable transport projects will be delivered throughout the plan period by DfI. The mitigation and enhancement benefits would be obtained in the medium to long term period, subject to DfI delivery and funding.</li> </ul>

TOPIC ↓	PROPOSED MITIGATION & ENHANCEMENT
<b>SPATIAL DEVELOPMENT</b>	
<b>Settlement</b>	<ul style="list-style-type: none"> <li>• Growth should be targeted within the existing settlement limits of the Principal City to minimise potential environmental effects from development in the countryside – policy HOU2 states that the presumption will be that all new housing development within the plan area will be delivered on previously developed land within the urban footprint.</li> <li>• Strong design policies (DES1-4 and RD1) and open space provision (policies GB1 and OS1-3) will ensure and maintain a quality living standard in all areas of the city.</li> </ul>
<b>City centre</b>	<ul style="list-style-type: none"> <li>• Mitigation and enhancement measures can be applied to minimise impacts on biodiversity, geodiversity and flood risk (policies NH1 and ENV4-5) as well as encouraging the integration of the blue and green infrastructure (policy GB1) within the City Centre.</li> </ul>
<b>SHAPING A LIVEABLE PLACE</b>	
<b>Housing</b>	<ul style="list-style-type: none"> <li>• Careful attention to site selection can ensure sustainable development, sufficient resources and facilities provision, and limit impacts on biodiversity, flood risk etc. This will be undertaken during the preparation of the Local Policies Plan.</li> <li>• The use of indicative annual rates of growth should be used to mitigate short term infrastructure constraints – this is outlined in policy HOU1, which outlines indicative annual rates of housing delivery over the plan period.</li> <li>• Any likely harm of windfall developments upon the surrounding character and infrastructure provision should be minimised, with all development planned to contribute to sustainable development. Policy HOU2 includes criteria which necessitates the provision of infrastructure if required as a result of the development or cumulatively and also requires developments to be accessible and convenient to public transport and walking and cycling infrastructure.</li> <li>• The definition of affordable housing is regulated by Registered Housing Associations and the NIHE administered Common Selection Scheme administered by NIHE. The opportunity for threshold review has been built into policy HOU5, should sites demonstrate viability concerns – <i>‘The council will consider suitable alternatives on a case-by-case basis’</i>.</li> <li>• Loss of residential stock will only be permitted in exceptional, criteria-based circumstances, as set out in HOU3, specifically only where it is complementary to surrounding residential uses and will not have adverse effects; also, in the event that the proposal is for necessary community infrastructure to serve the residential population of the area.</li> <li>• Environmental impacts should be appropriately managed through appropriate mitigation measures as individual developments are brought forward, including through policies ENV1-5 and NH1.</li> <li>• Flood Risk Assessments and Management Plans will be required to prevent any harm in areas of flood risk (policy ENV4) – this will be delivered at planning application stage. LPP stage will also seek to avoid the allocation of areas which are susceptible to flooding.</li> <li>• Effective management arrangements for considerable concentrations of intensive, large-scale housing and large-scale apartment developments should be employed to minimise risk of anti-social behaviour – policy RD1 requires management arrangements for such developments to be in place to ensure a positive and safe living environment.</li> </ul>

TOPIC ↓	PROPOSED MITIGATION & ENHANCEMENT
	<ul style="list-style-type: none"> <li>• Short-term let accommodation will be controlled effectively and permitted only where criteria-based circumstances are met – this is detailed in policy HOU13.</li> </ul>
<b>Design</b>	<ul style="list-style-type: none"> <li>• Flexibility will allow historic buildings conversion where strict criteria adherence might otherwise prejudice their retention – the justification text of policy RD3 (conversion or sub-division of existing buildings for residential use) includes the provision that in exceptional circumstances prevailing standards may be applied flexibly to best balance competing policy requirements such as bringing historic buildings back into use. Also, policy DES1 (principles of urban design), criteria a) outlines that sustainable design should respond positively to local context and character through architecture and urban form, including any impact on built and natural heritage.</li> <li>• Intensive Housing Nodes designation should be reviewed in the Local Policies Plan to allow for sub-division of smaller units in appropriate locations – this is the next stage of the plan preparation process.</li> </ul>
<b>CREATING A VIBRANT ECONOMY</b>	
<b>Economic growth</b>	<ul style="list-style-type: none"> <li>• Policy enhancement at Local Policies Plan stage can ensure that the existing employment areas are adequately protected. This is supported in the LDP draft policies EC1 Delivering Inclusive Economic Growth, EC2 Employment Land Supply, EC3 Major Employment and strategic employment locations, EC4 Loss of Zoned Employment Land to protect the supply of employment lands and RET1 Establishing a Centre Hierarchy to protect retail employment areas. This will enhance economic growth over the medium to long term plan period.</li> <li>• Policy enhancement at Local Policies Plan stage can ensure the city boundary is defined to accommodate growth over the plan period. Until such times, the city boundary shall be defined as per BMAP. The LDP draft policy EC2 Employment Land Supply, defines areas for economic growth within the City Boundary. This will enhance sustainable economic growth to create a vibrant city over the medium to long term plan period.</li> <li>• The LDP draft policies W2 Waste Management, and EC3 Major Employment and Strategic Employment Locations promotes the provision of suitable recycling facilities and promotion of the circular economy that can help mitigate the impact of increased waste production and provide opportunities for recycling facilities. This will potentially mitigate the effect over the medium to long term plan period.</li> <li>• A joined-up approach with transport policies will help deliver new development in the most accessible locations. This mitigation and enhancement are supported in the LDP draft policies EC1 Delivering Inclusive Economic Growth, EC2 Employment Land Supply, EC3 Major Employment and Strategic Employment Locations, TRAN1 Active Travel, TRAN2 Creating an Accessible Environment, TRANS3 Transport Assessment and TRANS4 Travel Plans. This integrated approach will mitigate the effects of unsustainable travel, to enhance sustainable economic growth over the medium to long term plan period.</li> </ul>

TOPIC ↓	PROPOSED MITIGATION & ENHANCEMENT
<b>Employment</b>	<ul style="list-style-type: none"> <li>• Employment land should be protected against competing uses. This can be mitigated in the LDP draft policies, EC4 Loss of zoned employment land to protect the supply of employment lands and RET1 Establishing a centre hierarchy to protect retail employment areas. This will mitigate the effect over the medium to long term plan period.</li> <li>• Retention of employment land will be required at key locations in the city. This is mitigated and enhanced through the draft LPD draft policies EC2 Employment Land Supply, EC3 Major Employment and Strategic Employment Locations, EC4 Loss of Zoned Employment Land to protect the supply of employment lands, and RET1 Establishing a Centre Hierarchy to protect retail employment areas. This will enhance the retention of employment land that will help to secure sustainable economic growth over the medium to long term plan period.</li> </ul>
<b>Development opportunity sites</b>	<ul style="list-style-type: none"> <li>• Various mitigation and enhancement measures can be applied when designating development opportunity sites, to minimise impacts on biodiversity, geodiversity and flood risk, and to encourage integration of the blue and green infrastructure within the city centre. This is supported by LDP draft policies CC1 Development Opportunity Sites, DES1 Principles of Urban Design, DES2 Masterplanning approach for major development, GB1 Green and Blue Infrastructure Network, OS2 New Open Space within Settlements, and OS3 Ancillary Open Space. The mitigation and enhancement effects will be delivered over the medium to long term plan period.</li> </ul>
<b>Tourism, leisure &amp; culture</b>	<ul style="list-style-type: none"> <li>• As all new proposals for tourism, leisure and cultural development would vary depending on location, suitable mitigation measures should be employed to ensure they are appropriately managed throughout the plan area. This is supported by the LDP draft Policies TLC1: Supporting Tourism Leisure and Cultural Development, BH1 Listed Buildings, BH2 Conservation Areas, BH3 Areas of Townscape Character, BH4 Works to Grounds affecting Built Heritage Assets, BH5 Archaeology, BH6 Parks, Gardens and Demesnes of Special Historic Interest, NH1 Protection of Natural Heritage Resources, LC1 Landscape, LC2 LVRP, LC3 Belfast Hills, and LC4 Coastal Area. The mitigation and enhancement effects will be delivered over the medium to long term plan period.</li> <li>• The development and enhancement of the evening and night-time economy should also be appropriately managed and protected through suitable mitigation measures incorporated into the LDP draft Policy TLC4: Evening and Night-time Economy. The mitigation and enhancement effects will be delivered over the medium to long term plan period.</li> </ul>

<b>A SMART CONNECTED AND RESILIENT PLACE</b>	
<b>Services</b>	<ul style="list-style-type: none"> <li>As all new proposals for development would vary depending on location, suitable mitigation measures should be employed to ensure they are appropriately managed throughout the plan area. Policies ITU1-3 will inform the development management process.</li> </ul>
<b>Renewable energy</b>	<ul style="list-style-type: none"> <li>Developers will be required to demonstrate how any unavoidable damage will be minimised and mitigated through a relevant management plan (policy ITU4).</li> </ul>
<b>Waste management</b>	<ul style="list-style-type: none"> <li>Suitable mitigation measures should be employed in the form of a precautionary approach and the use of locational criteria outlined in policies W1-3 will direct new waste facilities and infrastructure away from important areas of the city.</li> <li>Compliance with the siting, engineering and operational requirements of the Landfill Directive is an essential pre-requisite and strict controls will be applied under waste management licensing and IPPC permitting.</li> <li>Planning conditions or agreements will be used through policies W1-5 to mitigate any identified adverse effects.</li> <li>Waste management facilities should be secured for the long term by appropriately managing development within their vicinity. Policy W5 will, where appropriate, inform the decision-making process.</li> </ul>
<b>Minerals</b>	<ul style="list-style-type: none"> <li>Policy M1 and any developer agreements or supplementary planning guidance will ensure that minerals development is appropriately managed throughout the plan area.</li> <li>Where planning permission is granted, policy M1 and other LDP policies will ensure landscape quality, natural heritage, amenity and the wider environment will be protected through relevant conditions, including for mitigation measures, landscaping and aftercare.</li> </ul>
<b>Travel &amp; transport</b>	<ul style="list-style-type: none"> <li>Suitable design guidance is required to deliver safe and attractive routes as part of the built and natural environment, and to ensure provision of an integrated active travel network. Policy TRAN1 will inform the decision-making process.</li> <li>Transport Assessments (TRAN3) will allow social, economic and environmental effects of developments to be judged on a case-by-case basis and mitigation measures developed as necessary.</li> <li>Where development is considered appropriate but may need an end user/occupier to undertake mitigation measures, a Travel Plan (Policy TRAN4) is one of a number of complementary measures which can secure overall delivery of more sustainable travel patterns and reduce private car traffic generation.</li> <li>Suitable design guidance is required in policy TRAN5 that outlines mitigation measures to support new transport schemes and ensure benefits to the wider community in terms of connectivity with improvements for bus movements, cyclists, and pedestrians.</li> </ul>
<b>Access</b>	<ul style="list-style-type: none"> <li>Suitable mitigation, such as developer agreements, conditions and enforcement measures should be employed to ensure that all environments are accessible throughout the plan area. Policy TRAN2 will inform the decision-making process where appropriate.</li> <li>Suitable measures will also be required to ensure that developments involving access onto public roads and protected routes, car parking and servicing arrangements are appropriately managed throughout the plan area. Policy TRAN6 is derived from existing PPS to ensure road safety.</li> <li>Access for all shall be considered a key priority when assessing new development. Policies TRAN102 are essential to deliver equality to citizens of the city and will be delivered through the Development Management process.</li> </ul>

<b>A SMART CONNECTED AND RESILIENT PLACE</b>	
<b>Parking</b>	<ul style="list-style-type: none"> <li>• Parking supply and pricing policy initiatives can influence the choice of travel mode, resulting in more affordable public transport and active travel. The policies on parking standards (TRAN8-9) inform the decision-making process and help deliver the SPPS objective of managing travel demand and promoting sustainable travel.</li> <li>• Suitable mitigation measures such as design guidance and developer agreements should be employed to ensure that the design of car parking is high quality and does not impact significantly on the quality of the built and natural environment. Policies TRAN10-11 will inform the decision-making process.</li> <li>• Suitable mitigation measures should be put in place to ensure that temporary car parks are managed and enforced appropriately throughout the plan area through policy TRAN12. This will inform the development management process.</li> </ul>
<b>A GREEN AND ACTIVE PLACE</b>	
<b>All Topics</b>	<ul style="list-style-type: none"> <li>• Green and blue infrastructure network</li> <li>• Protection, provision, creation of open space</li> <li>• Sports facilities</li> <li>• Floodlighting</li> <li>• Protection of natural heritage resources</li> <li>• Landscape</li> <li>• Coast</li> <li>• Development in the countryside</li> </ul> <p>The policies that fall under the Green and Active theme have either been transposed directly from existing PPSs and the SPPS or derived from previous and established planning policy. They are, by their nature, founded upon the protection of the environment and seek to balance new development against wider environmental interests. In addition, they support socio-economic principles and objectives for the city and its people. As a general principle, they are criteria-based policies that set out clear environmental considerations. These will inform the decision-making process and, where appropriate, will also inform relevant planning conditions, including for mitigation measures, such as environmental protection, nature conservation, landscaping and countryside requirements. As such, the need for further mitigation is not considered appropriate or necessary for this group of policies.</p>

**Table 31: Proposed Mitigation & Enhancement Measures identified through the SA**

TOPIC ↓	PROPOSED MITIGATION & ENHANCEMENT FOR IDENTIFIED CUMULATIVE EFFECTS	
Employment Opportunities	?	<p>Cumulative effect identified: Unknown</p> <p>▶ The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities leading to reduced inclusive employment creation. Potential currency fluctuations due to Brexit may deter or reduce tourism numbers; and the levels of predicted out-of-state expenditure may not be achieved to meet the Belfast target.</p> <p>Proposed Mitigation:</p> <ul style="list-style-type: none"> <li>• The council has established a Brexit Standing Committee to monitor and mitigate potential impact of leaving the EU.</li> <li>• The council is also preparing a case for a City Region City Deal to secure potential funding for critical infrastructure that would help to promote economic development and build investor confidence.</li> <li>• Future growth in tourism will require the availability of more people with the requisite skills, and investment in skills for employment in the tourist industry will form a key element of the Belfast Region City Deal strategy to achieve inclusive growth.</li> </ul>
Economic Development	?	<p>Cumulative effect identified: Unknown</p> <p>▶ The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities, leading to reduced business creation and foreign direct investment.</p> <p>▶ The proposed Belfast Transportation Plan (Department for Infrastructure) may not adequately plan for sustainable travel or mitigate the potential increase in private car commuting resulting from the LDP's proposed economic growth levels. Demand for parking spaces may increase, which could subsequently erode available land required for economic growth. Greenhouse gas emissions may also increase; compromising the city's ability to mitigate climate change and air pollution, which would have negative health impacts.</p> <p>▶ The lack of an Executive to make strategic economic decisions may restrict our ability to deliver objectives and targets of both the LDP and Belfast Agenda.</p> <p>Proposed Mitigation:</p>



TOPIC ↓	PROPOSED MITIGATION & ENHANCEMENT FOR IDENTIFIED CUMULATIVE EFFECTS
	<ul style="list-style-type: none"> <li>▶ The Brexit Standing Committee will monitor and mitigate potential impact of leaving the EU. The City Region City Deal case may also secure funding for critical infrastructure to help promote economic development and build investor confidence.</li> <li>▶ The council's ongoing monitoring of the economic impact of a lack of a functioning Executive will help to mitigate potential impact on the LDP and Belfast Agenda.</li> </ul>
<b>Sustainable Waste Management</b>	<div style="display: flex; align-items: center;"> <div style="background-color: #f4a460; padding: 5px; margin-right: 10px;">-</div> <div>Cumulative effect identified: Minor negative</div> </div> <ul style="list-style-type: none"> <li>▶ Population growth will likely lead to a direct increase in waste generation.</li> </ul> <p>Proposed Mitigation:</p> <ul style="list-style-type: none"> <li>▶ The council is pursuing the potential of developing the growth of the Circular Economy through its Material Strategy.</li> </ul>

**Table 32: Proposed Mitigation & Enhancement Measures for Cumulative Effects**

## Box 7: HOW HAS THE SA INFLUENCED PLAN MAKING?

Identifying mitigation and enhancement measures to address impacts on social, economic and environmental factors has directly influenced our decision making and preparation of the LDP:

### **DRAFT PLAN STRATEGY**

- ▶ Mitigation and enhancement measures are integral to promotion of sustainable development through the draft policies
- ▶ Delivery of the Green & Blue infrastructure network is actively encouraged and promoted through the draft policies, and will continue through the Local Policies Plan
- ▶ Policies have been strengthened or introduced to ensure suitable measures are in place to appropriately manage the impact of development
- ▶ Criteria based policies have been worded to directly mitigate impacts on social, economic and environmental factors, and to control or restrict specific development to exceptional, criteria-based circumstances. This will be further emphasised through the Local Policies Plan
- ▶ Flexibility has been introduced where required to ensure appropriate balance and avoid conflicting prejudice
- ▶ Management plans, assessments and statements are a requirement of relevant policies to demonstrate suitable levels of protection, mitigation or enhancement for development proposals
- ▶ Conditions, agreements and enforcement measures will manage impact and aftercare of specific proposals

### **SUPPLEMENTARY PLANNING GUIDANCE NOTES**

- ▶ Identified the need for SPG to guide and facilitate the appropriate management of development throughout the plan area

### **LOCAL POLICIES PLAN**

- ▶ Sustainable development will be encouraged to limit impact
- ▶ Careful attention will be given when designating, allocating and prioritising land to minimise impact and enhance integration
- ▶ Key site requirements will be applied and reflected in local policies
- ▶ Proposed policies will be further enhanced, and designations reviewed to ensure adequate protection and mitigation of potential effects identified at DPS stage
- ▶ Locational criteria will be applied where relevant to help direct new development to the most appropriate areas of the city

5.8.4 The entire plan-making process is one of decisions, change and fine-tuning in response to many factors, including the SA. Identifying and clarifying these changes is therefore a key element of the SA process as it shows how the plan-making process has been influenced, in particular how the plan has changed and what mitigation measures have been incorporated into the plan. In addition to those summarised above, a full audit trail of all influencing factors and significant changes to the Draft Plan Strategy is documented in **Appendix 12**.



## 6 IMPLEMENTATION & MONITORING

This section sets out the interaction between the SA process and the LDP during the post-adoption stages of the Plan Strategy. In particular the focus is on the links between the LDP and other relevant plans; and the proposed monitoring measures the council intends to implement.

### 6.1 Links to other plans and programmes

6.1.1 The plan is a land use planning tool and primarily affects our physical space and built form. At this stage in the process there are a number of uncertainties that can affect our ability to achieve and meet the objectives set out in the SA Framework to the full extent as has been identified through our appraisal. In some instances, significant effects may be uncertain because the detail will be implemented through other plans, programmes and at project level.

#### **The Belfast Agenda (Belfast City Council)**

6.1.2 Working in tandem with the Belfast Agenda, many of the SA objectives can be furthered through the plans and programmes of our community planning partners. In particular, the positive effects on social and economic objectives, including health, housing, education, skills and employment, can be enhanced overall through complementary service delivery by our partners.

#### **Other plans, programmes and projects**

6.1.3 In addition to the Belfast Agenda, the following plans, programmes and projects will have direct influence on the ability of the Draft Plan Strategy to meet the SA Objectives:

- ▶ The **Green & Blue Infrastructure Plan** (Belfast City Council)
- ▶ **Belfast Metropolitan Transport Plan** (Department for Infrastructure)
- ▶ **Belfast City Regional Deal**: Belfast City Council is preparing a proposition to the UK Government for a region deal to secure funding for critical infrastructure for physical, economic and social regeneration projects that would help to deliver the Belfast Agenda targets)
- ▶ Masterplans, urban design and landscape frameworks, and developers' briefs for **Development Opportunity Areas**:
  - ▶ Greater Clarendon, City Quays and Sailortown
  - ▶ Inner North West
  - ▶ North East Quarter
  - ▶ Oxford Street and East Bank
  - ▶ Transport Hub and South Centre Linen Quarter

## 6.2 Monitoring

- 6.2.1 After adopting the Plan Strategy, a formal monitoring regime needs to be finalised. The aim of SA monitoring is to deal with any unforeseen problems and to check whether the mitigation measures for significant effects are being implemented effectively. Monitoring data also provides a basis for the Scoping Report of the subsequent Local Policies Plan for the LDP. Furthermore, whilst many sustainability and environmental changes will be caused by factors outside of the plans' control (e.g., people's behaviour, technical changes), it is useful for the council to be aware of these and consider whether the LDP needs to be adapted to manage them.
- 6.2.2 Regulation 17 of EAPP (NI) Regulations sets out the requirements for monitoring the implementation of the plan. It states that "*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake*

*appropriate remedial action*<sup>18</sup>. In addition, Annex I (i) of the SEA Directive states that the Environmental Report (i.e., this integrated SA Report) should provide “... a description of the measures envisaged concerning monitoring”<sup>19</sup>.

- 6.2.3 The SA monitoring framework is targeted towards the baseline aspects where likely significant effects were identified through the SA, and any relevant mitigation measures that were proposed. The monitoring proposals are directly aligned with monitoring that is scheduled for the Draft Plan Strategy and the Belfast Agenda, both to avoid duplication and ensure that appropriate remedial action can be taken.
- 6.2.4 Monitoring will allow the actual significant effects of implementing the plan to be tested against those predicted in the SA. It can also help us identify any unforeseen adverse effects at an early stage and enable remedial action to be implemented if necessary. It is particularly useful in helping to answer the following questions:
- ▶ Were the SA predictions of sustainability effects accurate?
  - ▶ Is the LDP contributing to the achievement of desired sustainability objectives?
  - ▶ Are mitigation measures performing as well as expected?
  - ▶ Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required?

### **6.3 Monitoring Framework**

- 6.3.1 Given the current stage of the Belfast LDP, it is important to remember that whilst the formal framework for monitoring will not be addressed until the Plan Strategy is fully adopted, the SA allows us to prepare a preliminary framework at this stage. This may then evolve in response to the results of consultation or changes to the plan.

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<sup>18</sup> [Regulation 17 of EAPP \(NI\)](#)

<sup>19</sup> [SEA Directive 2001/42/EC, Annex I \(i\)](#)

- 6.3.2 The final Monitoring Framework will be presented in a formal SA Statement following adoption of the Plan Strategy (see **Section 7.2**). Additionally, the council is required to prepare an annual monitoring report, which can include monitoring findings of any likely significant effects resulting from the plan's implementation. As we move through the preparation process of the Local Policies Plan, this framework will be updated as required to reflect the most up to date monitoring indicators.
- 6.3.3 **Table 33** presents the preliminary programme of monitoring. This will help us to measure the plan's performance, in particular where significant effects were identified, and to monitor any uncertainties noted within the appraisal.
- 6.3.4 The framework is based on each SA Objective, and provides a list of the proposed monitoring indicators, and the sources of information for each. During the course of the LDP process, the council will continue to work with statutory bodies to finalise and agree the relevant sustainability effects to be monitored.



Sustainability Objective	Target	Potential Indicator	Source(s)
<b>SOCIAL</b>			
1. Deprivation & inclusivity	<ul style="list-style-type: none"> <li>To reduce deprivation and social exclusion, in particular in those areas most affected</li> <li>To encourage an inclusive and equal society</li> <li>To promote regeneration, reducing disparity with surrounding areas</li> <li>To increase the ability of people to influence decisions</li> </ul>	Multiple Deprivation Measure	NISRA
		Proportion of people who live in wards that rank within the most deprived 10% and 25% in Belfast/NI	
		Fuel poverty	
		Number of hate motivated crimes	
		Number of interfaces in Belfast	BCC Good Relations Unit / NIHE
		Respect Index	NISRA
2. Health & wellbeing	<ul style="list-style-type: none"> <li>To encourage healthy lifestyles and provide opportunities for sport and recreation</li> <li>To support the reduction of health inequalities</li> <li>To improve physical and mental health</li> <li>To reduce noise levels and concerns</li> <li>To contribute to improving air quality</li> <li>To contribute to improving water quality</li> </ul>	Life expectancy, gap in health life expectancy between the lowest and highest deprivation quintile	NISRA
		Death rates from cancer, circulatory disease, respiratory illnesses, accidents and suicides	NINIS
		Infant mortality	
		Access to a GP or primary care professional	NISRA
		Proportion of journeys on foot or by cycle	Travel Survey for NI (TSNI)
		Access to the countryside	TSNI
		Multiple Deprivation Measure	NISRA
		Proportion of the population of adults and/or children who are obese	NINIS

Sustainability Objective	Target	Potential Indicator	Source(s)
	<ul style="list-style-type: none"> <li>To encourage access to ecological networks by encouraging green infrastructure, providing walking and cycle routes to heritage and other recreational places of interest</li> </ul>	Proportion of people who rank themselves as having high levels of wellbeing	NISRA / ONS
		Proportion of adults participating in moderate exercise at least three days per week	NINIS / DOH
		Number of households in housing stress	NIHE
		Number of GP surgeries, health facilities	BHSCT / Open Data NI
		Noise pollution / nuisance	BCC Environmental Health Data
3. Quality housing & housing need	<ul style="list-style-type: none"> <li>To increase access to affordable housing</li> <li>To encourage a range of dwelling type, size and tenure</li> <li>To reduce homelessness</li> <li>To improve housing quality</li> <li>To ensure the housing needs of an ageing population are met</li> <li>To reduce the number of vacant properties</li> </ul>	Homelessness	NIHE
		Temporary accommodation/rough sleepers	
		Affordable housing House price / earnings affordability ratio	BCC Housing Monitor
		Housing completion figures	
		Homes improved for energy efficiency and affordable warmth	NIHE
		Housing growth indicators	Dfi
		Annual Housing Need Assessment	NIHE
		Waiting lists and allocations	

Sustainability Objective	Target	Potential Indicator	Source(s)
4. Safety, crime & antisocial behaviour	<ul style="list-style-type: none"> <li>To support a reduction in the actual levels of crime</li> <li>To reduce the fear of crime</li> <li>To promote design out crime principles</li> </ul>	Number of victims of any crime	NISRA
		Number of hate-motivated crimes	
		Proportion of people who feel safe in Belfast	
		Number of antisocial behaviour incidents	
		Number of interfaces in Belfast	
		Respect Index	
5. Education & learning opportunities	<ul style="list-style-type: none"> <li>To improve access to high quality educational facilities</li> <li>To improve the level of investment in key community services</li> <li>To make access easier for those without access to a car</li> <li>To improve access to work experience, apprenticeships and training, especially young people</li> <li>To encourage affordable access</li> </ul>	Proportion of population who have attained Level 2 or above	NISRA
		Gap between percentage of school leavers and percentage of Free School Meals school achieving at Level 2 or above including English and Maths	
		Proportion of children who have reached attainment at Key Stage 2 (up to 11 years)	
		Percentage of working age population (16 to 64) with qualifications to either NVQ Level 3 or 4 or a trade apprenticeship or with no formal qualifications	
6. Access to services & facilities	<ul style="list-style-type: none"> <li>To encourage the level of investment in key community services</li> <li>To improve accessibility to key local services (schools, GP surgeries, hospitals, town, district)</li> </ul>	Multiple Deprivation Measure	NISRA
		Access to a GP or primary care professional and other primary care facilities	
		Access to a primary school	DfE / Open Data NI

Sustainability Objective	Target	Potential Indicator	Source(s)
	and local centres) and employment opportunities <ul style="list-style-type: none"> <li>To encourage affordable access</li> <li>To make access easier for those without access to a car</li> <li>To protect the shopping and community services function of local service centres</li> </ul>	The provision of public transport routes	Translink
<b>ECONOMIC</b>			
7. Employment opportunities	<ul style="list-style-type: none"> <li>To help to reduce short and long-term local unemployment</li> <li>To encourage job opportunities for those most in need of employment particularly those in areas of high unemployment deprivation</li> </ul>	Claimant count Proportion of people of working age who are in work Proportion of people of working age who are economically inactive	NISRA
8. Economic development	<ul style="list-style-type: none"> <li>To encourage new business start-ups and opportunities for local people</li> <li>To encourage business development and enhance productivity</li> <li>To encourage the resilience of business and the local economy</li> <li>To promote growth in key sectors</li> <li>To promote growth in key clusters</li> </ul>	Percentage change in the total number of VAT registered businesses including start up's	NISRA
		Vacancy rates	BCC
		Investment into Belfast by externally owned businesses	Invest NI
		Performance of the Belfast Urban Area economy	Centre for Cities Metrics
		Number of businesses by broad industry group	Invest NI Belfast Regional Briefing

Sustainability Objective	Target	Potential Indicator	Source(s)
	<ul style="list-style-type: none"> <li>To enhance the image of the area as a business location</li> <li>To encourage indigenous business</li> <li>To encourage inward investment</li> <li>To make land and property available for business development</li> <li>To encourage tourism investment</li> <li>To maintain and enhance the vitality and viability of the City Centre</li> </ul>	Uptake of zoned land	BCC
		VAT registrations in rural areas	
		Number of planning consents for business premises in rural areas	
		Comparative industrial and office rental costs	Centre for Cities
		Proposed development of key economic sites	BCC
		Employment land availability	
		Number of business applications granted planning consent	
		Number of hotel rooms	NISRA
9. Sustainable transport & travel	<ul style="list-style-type: none"> <li>To support the reduction of traffic volumes and congestion</li> <li>To encourage the proportion of journeys using modes other than the car</li> <li>To encourage walking and cycling</li> <li>To support the reduction of commuting</li> <li>To improve accessibility to work by public transport; walking and cycling</li> <li>To improve access between key employment areas and key transport interchanges</li> </ul>	Average distance travelled to work or school	TSNI
		Location of jobs in proximity to residents	TSNI
		Proposed development/improvements of key infrastructure/services	DfI
		Travel to work by sustainable modes of transport	TSNI
		Traffic congestion	
		Heavy goods vehicle mileage intensity	

Sustainability Objective	Target	Potential Indicator	Source(s)
	<ul style="list-style-type: none"> <li>To encourage rail and water-based freight movement</li> </ul>		
<b>ENVIRONMENTAL</b>			
10. Biodiversity	<ul style="list-style-type: none"> <li>To conserve and enhance habitats of international, regional and/or local importance and create habitats in areas of deficiency</li> <li>To conserve and enhance species diversity; and in particular avoid harm to protected species</li> <li>To conserve and enhance sites designated for their nature conservation interest at the regional or national level</li> <li>To protect and enhance woodland cover and trees and promote their management</li> <li>To improve access to and promote the educational value of sites of biodiversity value</li> <li>To protect and enhance geodiversity</li> <li>To enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks</li> </ul>	Number/area of international, regional and local sites of natural importance and condition of Natura 2000 sites	NIEA/SES
		Achievement of Biodiversity Action Plan Targets	BCC
		Native species at risk especially protected species	NIEA
		Number of Tree Preservation Orders	BCC
		Programme for Government indicator on Biodiversity	Measurement annex in development NISRA

Sustainability Objective	Target	Potential Indicator	Source(s)
11. Soil	<ul style="list-style-type: none"> <li>To minimise development on Greenfield sites</li> <li>To ensure that, where possible, new development occurs on derelict; vacant and underused previously developed land and buildings</li> <li>To ensure contaminated land is remediated as appropriate</li> <li>To minimise the loss of soils to development and maintain and enhance soil quality</li> <li>To reduce the risk of subsidence</li> <li>To increase the amount of development on previously developed land</li> </ul>	Proportion of development within the Urban Footprint	BCC
		Proportion of development on brownfield sites	
		DAERA classifications of land quality via Agricultural Land Classifications NI	DAERA
		DAERA data on Areas of Natural Constraint	
12. Built & historic environment	<ul style="list-style-type: none"> <li>To protect and enhance Conservation Areas and other sites, features and areas of historical and cultural value</li> <li>To protect listed buildings and their settings</li> <li>To help preserve, enhance and record archaeological features and their settings</li> <li>To help to protect and enhance historic buildings through sensitive adaptation and reuse</li> </ul>	Number of Conservation Areas, Areas of Townscape Character. Listed buildings, archaeological sites	BCC / DAERA / DfC
		Number of Buildings at Risk on BHARNI	BHARNI
		Loss or damage of listed buildings/monuments/historic landscapes and their settings	HED/ NIEA
		Number of ASAls, AAP, and Historic Parks and Gardens	HED
		Number of scheduled monuments in poor condition or at high risk	HED

Sustainability Objective	Target	Potential Indicator	Source(s)
	<ul style="list-style-type: none"> <li>To enhance the quality of priority areas for townscape and public realm enhancements</li> <li>To protect and enhance local distinctiveness and sense of place</li> <li>To encourage and support the articulation of statutory requirements in relation to Scheduled Historic Monuments (i.e., requirement for consent)</li> <li>To recognise and work to preserve and enhance the historic townscape</li> <li>To foster Heritage Led Regeneration</li> <li>To promote heritage based, sustainable tourism</li> </ul>		
13. Landscape & geodiversity	<ul style="list-style-type: none"> <li>To improve the landscape character and visual amenity of open spaces</li> <li>To protect and enhance sensitive landscapes</li> <li>To minimise visual intrusion and protect views</li> </ul>	New homes built on previously developed land Vacant land, properties and derelict land Areas of landscape quality Number of Townscape Character Areas/Areas of Village Character Local Landscape Policy Areas	BCC
14.	<ul style="list-style-type: none"> <li>To ensure adequate access to public open space within a</li> </ul>	Living Environment Deprivation – Outdoor Physical Environment Number/area of council areas of open space, sport and recreation	NISRA BCC



Sustainability Objective	Target	Potential Indicator	Source(s)
Open space & natural greenspace	reasonable walking distance from people's homes <ul style="list-style-type: none"> <li>To promote access to green infrastructure and ecological networks</li> <li>To create new areas of open space and natural greenspace</li> </ul>	Number/length of greenways	
15. Sustainable waste management	<ul style="list-style-type: none"> <li>To lead to reduced consumption of materials and resources</li> <li>To encourage the reduction of household waste</li> <li>To support the increase waste recovery and recycling and improve facilities</li> <li>To support the reduction hazardous waste</li> <li>To support the reduction of waste in the construction industry</li> </ul>	Waste arising and management Household waste arising Recycling rate of household waste % Materials recycled Percentage of the tonnage of household waste arising which have been (a) recycled (b) composted (c) used to recover heat, power and other sources of energy (d) land filled Construction and demolition waste rate	BCC Waste Management Plan
16. Water	<ul style="list-style-type: none"> <li>To support the improvement of the quality of surface and ground water</li> <li>To encourage the reduction of water consumption and improve water efficiency</li> <li>To encourage the efficient use and management of water</li> </ul>	Frequency of flood events Development in the flood plain Development in areas at risk of flooding Numbers of people and properties affected by flood events Numbers of flood management systems including SuDs	Rivers Agency NI Water BCC BCC Rivers Agency NI Water

Sustainability Objective	Target	Potential Indicator	Source(s)
	<ul style="list-style-type: none"> <li>To incorporate sustainable urban drainage systems as part of the design where appropriate</li> <li>To incorporate new green space and habitat creation helping to mitigate flood risk</li> </ul>	National water quality figures	NIEA
		NI Water quality data	NI Water
		Water consumption data	
17. Air quality	<ul style="list-style-type: none"> <li>To support the improvement of air quality</li> <li>To help achieve the objectives of the Air Quality Management Plan</li> <li>To reduce emissions of key pollutants</li> </ul>	Population living in Air Quality Management Areas Air Quality data	BCC
18. Greenhouse gas & low carbon economy	<ul style="list-style-type: none"> <li>To encourage renewable energy production</li> <li>To reduce emissions of greenhouse gases</li> <li>To support the development of a Circular Economy</li> <li>To support the digital economy</li> <li>To help to reduce our energy consumption</li> </ul>	Energy Consumption	NISRA
		Energy Consumption and Renewable Generation Statistics	DfE
		Number of public electric vehicle charging points in Belfast	Dfi
		Greenhouse gas emissions indicator	BCC
19. Climate change & flood risk	<ul style="list-style-type: none"> <li>To help reduce the impact of increased urban temperatures on people and property</li> <li>To promote sustainable design and construction measures</li> </ul>	Proportion of energy supplied from renewable sources	DfE Electricity Consumption and Renewable Generation Statistics
		Energy use by type (gas, oil and electricity)	DfE

Sustainability Objective	Target	Potential Indicator	Source(s)
	<ul style="list-style-type: none"> <li>To support development located outside areas of high flood risk</li> </ul>	Percentage of land at 'significant flood risk'	BCC
	<ul style="list-style-type: none"> <li>To reduce emissions of greenhouse gases by reducing energy consumption and the need to travel</li> </ul>	Frequency of flood events	Rivers Agency
	<ul style="list-style-type: none"> <li>To support an increased proportion of energy needs being met from renewable sources</li> </ul>	Numbers of people and properties affected by flood events	NI Water
	<ul style="list-style-type: none"> <li>To reduce emissions of ozone depleting substances</li> <li>To minimise the risk of flooding from rivers and watercourses to people and property</li> <li>To reduce the risk of damage to property from storm events</li> <li>To support building designs and a green infrastructure that is adapted to climate change</li> </ul>	Carbon Dioxide Emissions per capita	BCC Air Quality Management Plan

**Table 33: Proposed Monitoring Framework for Belfast LDP**



## 7 NEXT STEPS

This chapter sets out the next stages of the SA process, in particular the role of the SA following publication, consultation and adoption of the Plan Strategy document.

### 7.1 Summary

- 7.1.1 This SA Report has been published alongside the Draft Plan Strategy of the Belfast Local Development Plan for consultation, and incorporates the Environmental Report as required by the SEA Directive. It presents the integrated findings of the combined SA and SEA of the plan document, including the assessment of reasonable alternatives and recommendations for mitigating and monitoring significant effects.
- 7.1.2 Overall, significant positive sustainability effects are predicted to result from the Draft Plan Strategy throughout the plan term and beyond, particularly in relation to growth, housing provision, accessible travel, economy and jobs, and the vitality and viability of the city centre.
- 7.1.3 A small number of neutral effects have been identified in relation to integrated transport systems and sustainable travel, although such impacts may be minimised and improved through the future delivery and implementation of the Department's Belfast Metropolitan Transport Plan.
- 7.1.4 Likewise, a small number of neutral and minor negative effects are predicted in relation to the sustainable management of waste within the plan area, in particular should the ambitious growth aspirations of the plan be achieved. Nonetheless, such impacts can be minimised and mitigated through suitable measures identified in the SA process and a precautionary approach to development within the plan area.

## 7.2 What happens next?

7.2.1 Following publication of the Draft Plan Strategy and this SA Report, representations are invited through the subsequent consultation process. Modifications to both may be made in response to consultation, and any significant changes to the plan will be subject to additional appraisal.

7.2.2 SEA Regulations require the council to produce a formal, post-adoption SA Statement to accompany the Plan Strategy, as soon as reasonably possible after its adoption. The purpose of the post-adoption statement is to outline how the SA process has informed and influenced the plan preparation and decision-making process and demonstrate how consultation on the SA was taken into account. The SA Statement will contain the following information:

- The reasons for choosing the plan as adopted in the light of other reasonable alternatives dealt with,
- How environmental and sustainability considerations were integrated into the plan,
- How consultation responses were taken into account; and
- Measures that are to be taken to monitor the significant effects of the plan.

### 7.3 Consultation arrangements

7.3.1 The SA Report and Scoping Report are available for consultation alongside the Draft Plan Strategy and supporting documents, including the HRA and EQIA, for a statutory consultation period of **eight weeks**, from **20 September** to **15 November 2018**. Prior to this it will also be available for review for a **four-week** period; from **23 August** to **20 September 2018**.

7.3.2 Responses to this consultation exercise should be sent to [localdevelopmentplan@belfastcity.gov.uk](mailto:localdevelopmentplan@belfastcity.gov.uk) and:

**Belfast Planning Service  
Cecil Ward Building  
4-10 Linenhall Street  
BELFAST  
BT2 8BP  
02890 500510**

7.3.3 It can be viewed online on our [Local Development Plan webpage](http://www.belfastcity.gov.uk/ldp), ([www.belfastcity.gov.uk/ldp](http://www.belfastcity.gov.uk/ldp)). Hard copies can be viewed at the above address.

## 8 LIST OF APPENDICES

8.1 The following table lists the accompanying appendices relevant to this report. They are grouped in accordance with the general themes or stages of the SA process.

Stage	Appendix & Title	
← Legislative	1	Belfast LDP Timetable
	2	Checklist – Development Plan Practice Note 04: Annex 9
	3	Belfast LDP & SA Timetable Links
← Scoping	4	Plan, Policies & Programme Review
	5	Baseline Information
	6	Key Sustainability Issues
← POP	7	POP: SA Tables & Matrices
	8	POP: SA Likely Significant Effects
	9	POP: Consultation Responses
← DPS	10	DPS: LDP & SA Compatibility Assessment
	11	DPS: SA Tables & Matrices
Audit	12	SA Audit Trail

**Table 34: List of Appendices**





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**Belfast**  
City Council



# Belfast Local Development Plan

**Addendum May 2022**

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

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



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## Executive Summary

This document comprises an Addendum to the Sustainability Appraisal Report August 2018, one of the plan documents prepared for Belfast City Council's draft Plan Strategy for the Local Development Plan 2035.

Following an independent examination in 2020/2021, the Planning Appeals Commission concluded that, subject to modifications, the draft Plan Strategy was considered to meet the relevant tests of soundness. In February 2022 the Department for Infrastructure issued a direction to the Council. This directs the council to address the required modifications, along with any necessary engagement and consultation, prior to formal adoption of the Plan Strategy. These modifications are detailed in Schedule 1 of the direction made by the Department, which is published alongside this document.

This addendum should be read in conjunction with the **Sustainability Appraisal Report August 2018**. It provides a full appraisal of the modifications set out in Schedule 1 of the direction through the sustainability appraisal process and highlights the effects that the modifications had in regard to the initial sustainability appraisal of the draft Plan Strategy. This has been done by:

- 1. Screening out modifications which do not need to be subject to sustainability appraisal, as they do not have the potential to lead to significant sustainability effects; and*
- 2. Undertaking a sustainability appraisal of modifications which have been screened in as they do have the potential to lead to significant sustainability effects.*

The findings are set out in **section 2** and **section 3** of this document.

This addendum highlights the effects that the required modifications are likely to have with regards to the original Sustainability Appraisal published in August 2018. It demonstrates that the modifications to the draft Plan Strategy can be made without impacting or changing how the plan as a whole would perform against the SA Objectives.



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# 1. Introduction

## Independent examination of the draft Plan Strategy

- 1.1 In December 2019 the Department for Infrastructure (DfI) appointed the Planning Appeals Commission (PAC) to conduct an Independent Examination (IE) of Belfast City Council's draft Plan Strategy (dPS), which was held over two sessions between November 2020 and March 2021.
- 1.2 In September 2021 the PAC made its recommendations under section 10(8) of the Planning Act Northern Ireland 2011, which concluded that, subject to recommended amendments, the dPS satisfies all the legislative requirements as well as the procedural, consistency, coherence and effectiveness tests of soundness set out in Development Plan Practice Note 6 (DPPN 6) and that the dPS was considered sound on that basis.

## Post-examination modifications

- 1.3 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 Planning Act (Northern Ireland) 2011, issued a direction to the Council. This directs the Council to address the PAC's requirements (set out through 78 required modifications in Schedule 1), along with any necessary engagement and consultation, prior to formal adoption of the Plan Strategy. The direction, including Schedule 1 which sets out the required modifications to the plan, is published alongside this document.
- 1.4 To fulfil the obligations set out in the direction the Council will be required to modify the dPS to include all modifications detailed in Schedule 1, and to engage with the appropriate consultation bodies prior to undertaking public consultation in relation to any changes considered necessary.

## Sustainability appraisal of modifications

- 1.5 Any modifications to the dPS have the potential to change the appraisal of likely effects on social, economic and environmental interests. They therefore require consideration through the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process in order to determine if they alter the 'likely significant effects' predicted in the 2018 SA Report, or if they may result in new likely significant effects.
- 1.6 This document forms an addendum to the SA Report August 2018 and looks to identify whether, as a result of the required modifications, the outcomes of that report should be varied from those originally reported. As such, whilst this addendum is a full SA of the required modifications, it should still be read in conjunction with the 2018 SA Report.
- 1.7 This addendum incorporates the following:
- *Screening of all the required modifications to identify whether they materially change what the SA assessed (i.e., if they change what actions the LDP might inevitably lead to), or what the SA assumed about how the LDP would be implemented,*
  - *A detailed assessment of the required modifications 'screened in' and identified as requiring further appraisal; and*
  - *Conclusions & recommendations*

## Statutory Requirements

- 1.8 The SA must assess the social and economic effects of the LDP as well as the environmental effects. It therefore must comply with EU SEA Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (SEA Directive). The SEA Directive is transposed into Northern Ireland legislation through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP(NI) Regulations).

1.9 This addendum to the SA Report August 2018 has been prepared by Belfast City Council in accordance with:

- *Sections 8(6) and 9(7) of the Planning Act (Northern Ireland) 2011,*
- *Regulation 15 and 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, and*
- *The Environmental Assessment of Plans & Programmes Regulations (Northern Ireland) 2004 (EAPP).*

### **Consultation**

1.10 Consultation plays a hugely important role in the preparation of the LDP and informing the way in which we undertake the SA. We have actively consulted as required throughout the process and will continue to do so at each relevant stage as we move forward. This ensures that relevant stakeholders have the opportunity to be involved and ultimately help shape the LDP.

1.11 In line with the consultation arrangements set out in the SA Report August 2018, representations to this addendum are invited through the subsequent consultation process. Details of the consultation arrangements are provided in **Section 5**.



## 2. Screening of required modifications

- 2.1 Schedule 1 of the direction issued by DfI sets out 78 required modifications (RM) in order that the dPS be considered sound.
- 2.2 The first stage of reporting as part of the SA Addendum is an initial screening of all RMs to identify those that could have a potential significant effect on the final outcome of implementation of the Plan Strategy. Each RM has been compared against the plan policies and supporting information to check whether or not it changes the intention of that policy or supporting text, and subsequently the published SA results or any of the SA's original assumptions. This screening is set out in **Table A1** of **Appendix 1**, which provides full details of each modification and the reason why they were screened in or out.

### Screened out modifications

- 2.3 The majority of the modifications had been discussed and agreed between the council and the PAC through the IE process, which included changes such as typing error corrections, minor amendments to text for clarification, factual updates and mapping corrections. On this basis and by virtue of the minor nature of their changes, 76 of the 78 modifications could be '*screened out*'. See **Table A1** of **Appendix 1** for further details.
- 2.4 A detailed sustainability appraisal is not required for these modifications as they would have no effect on the outcomes of the 2018 SA Report.

### Screened in modifications

- 2.5 RM references MOD05 and MOD06 were 'screened in' as the proposed introduction of a new strategic policy was considered to have the potential to alter the likely significant effects within the scope of the 2018 SA Report. A detailed appraisal of the modifications, including assessment of reasonable alternatives, is required to understand what impact they may have on the SA of the plan as a whole.



### 3 Detailed assessment of required modifications

- 3.1 The second stage of this process is where a RM has been ‘screened in’, the identified substantive changes must be assessed in detail. This involves assessing the main identified outcomes of the amendment against the SA Objectives and questions set out in the SA Framework. The appraisal works towards meeting the identified SA Objectives and therefore identifying the extent to which the recommended amendment has impacted the overall appraisal of the dPS as a whole. The assessment methodology, scoring formulas and categories used are the same as those used in the 2018 SA Report.
- 3.2 Following the initial screening in **Table A1 (Appendix 1)**, it has been determined that RM references MOD05 and MOD06 should be ‘screened in’ for detailed appraisal:

*Table 1: Summary of ‘screened in’ modifications*

Direction ref	Recommended modification
MOD05	<i>“Inclusion of a strategic policy on phasing as outlined in paragraph 3.42 of the PAC IE report. Consultation to be undertaken by BCC and final wording to be agreed with Department.”</i>
MOD06	<i>“Inclusion of a policy relating to public services/utilities as set out in paragraph 3.43 of the PAC IE report. Consultation to be undertaken by BCC and final wording to be agreed with Department.”</i>

- 3.3 Both were suggested in response to the IE discussions on Policy SP1 ‘Growth Strategy’ of the dPS. Given the nature of the recommended modifications and in line with the details provided in paragraphs 3.42 and 3.43 of the PAC IE report, the council is satisfied that both can be addressed together through the introduction of one new strategic policy, which will be referred to as ‘Strategic Policy SP1A’.

- 3.4 The introduction of a new policy could have a potential significant effect on the final outcome of the dPS implementation, therefore a detailed appraisal of the proposed policy, including assessment of reasonable alternatives, is required to understand what impact the policy may have on the SA of the plan as a whole.

### **Appraisal of new Strategic Policy SP1A**

- 3.5 The full detailed sustainability appraisal of the new policy is set out in **Tables A2 – A7** in **Appendix 2**. This includes consideration of reasonable alternatives and detailed assessment matrices of all options against the SA Objectives. Assessment scoring and effect significance reflect the same methodology and formulas as per paragraphs **2.6.4 – 2.6.7** of the **2018 SA Report**, with updated versions also provided in **Appendix 2**.
- 3.6 Subsequent assessments were then carried out on the council's preferred option to determine its total score, and the total effects of the updated Strategic Policies against the SA Objectives. Finally, it was determined how the preferred option would sit alongside the remainder of the dPS policies; and whether its introduction would influence or impact the effects of the plan as a whole against the SA Objectives. **Table 2** below provides a summary of the detailed work in **Appendix 2**, alongside the subsequent conclusions and outcomes.



Table 2: Summary of detailed Sustainability Appraisal of new policy SP1A

Consideration of reasonable alternatives	
Summary	Outcome of appraisal
<p>Clarifies where reasonable alternatives were identified for the policy option, and if not, the reasons why they were scoped out. Includes:</p> <ul style="list-style-type: none"> <li>• Reasons for alternatives considered</li> <li>• Detailed consideration of social, economic &amp; environmental effects of proposed policy and reasonable alternative</li> <li>• Reasons for choosing preferred option</li> <li>• Mitigation</li> <li>• Timescale of effect</li> </ul>	<p>The PAC report and Direction from DfI make it clear that such a policy is required to make the plan sound.</p> <p>'No policy' is therefore <b><i>not considered a reasonable alternative</i></b> and has been scoped out from the outset.</p> <p>2 options have been identified as being reasonable:</p> <ul style="list-style-type: none"> <li>• <b>Option 1; 'Prescriptive phasing policy'</b> reflects the PAC's suggested wording in paragraph 3.42 of the PAC Report and envisages a strict separation of land into specific phasing.</li> <li>• <b>Option 2; 'Strategic policy plus LPP'</b> represents the council's proposed wording, which has a similar effect to the PAC's suggested wording but with more flexibility in-built, referring to existing provisions within the broader dPS and the need for phasing within the Local Policies Plan (LPP).</li> </ul>

Consideration of reasonable alternatives	
Summary	Outcome of appraisal
	<b>Option 2 has been selected as the council's preferred option on the basis that it scores higher, and the overall appraisal against the SA Objectives is more positive.</b>
Assessment matrix for new policy options	
Summary	Outcome of appraisal
Assessment matrix that appraises both options against the 19 SA Objectives.	<ul style="list-style-type: none"> <li>Option 1 scored <b>- 5</b>, which equates to a minor negative total score.</li> <li>Option 2 scored <b>+ 6</b>, which equates to a minor positive total score.</li> </ul> This demonstrates that Option 2, as the council's preferred option, would <b>perform better</b> against the SA Objectives (SAOs) than Option 1.
Total Strategic Policy scores	
Summary	Outcome of appraisal
Scoring matrix of the council's preferred policy option, alongside the other Strategic Policies to show updated total scores of all Strategic Policies.	The total policy score for the council's preferred option is a <b>minor positive</b> , which would sit alongside the minor positive scores recorded for all other Strategic Policies.
All Policy Scores	
Summary	Outcome of appraisal
Table showing the total scores of all dPS policies.	The total scoring for all policies in the plan has been updated to include the council's preferred option, which introduces an additional <b>minor positive impact</b> .

Total Effects of Strategic Policies on SA Objectives	
Summary	Outcome of appraisal
<p>Scoring matrix of all six Strategic Policies appraised, to show the updated total effects of each Strategic Policy against the SA Objectives. Also includes a comparison with the total effects of the five Strategic Policies that were previously appraised in the 2018 SA Report (i.e., not including new policy SP1A).</p>	<p>Introducing the council's preferred option into the dPS has affected ten individual scores.</p> <p>Of these, the final total effects have changed for <b>three SA Objectives</b>:</p> <ul style="list-style-type: none"> <li>• 2 are <b>less positive</b> with changes from <b>significant positive to minor positive</b> (SAOs 3 &amp; 8),</li> <li>• 1 is <b>more positive</b> with a change from <b>neutral to minor positive</b> (SAO 16).</li> </ul>
Total Effects of the LDP	
Summary	Outcome of appraisal
<p>Scoring matrix showing the total plan effects, with the total scores of all plan policies within each of the six themes shown against the SA Objectives. Also includes a comparison with the total plan effects from the 2018 SA Report (i.e., not including new policy SP1A).</p>	<p>The SA appraisal of the council's preferred option demonstrates that its introduction into the Plan Strategy will have <b>no impact</b> on how the plan performs as a whole against the 19 SA Objectives.</p> <p>The results of the 2018 SA Report will therefore not be affected, and will <b>remain unchanged</b>.</p> <p><i>Updated total plan effects against the SA Objectives:</i></p> <ul style="list-style-type: none"> <li>• 14 x significant positive effects</li> <li>• 4 x minor positive effects</li> <li>• 1 x neutral effect</li> </ul>

## Summary

3.7 Having undertaken a detailed appraisal of the two reasonable alternatives considered for new Policy SP1A, it is concluded that:

- *Option 2 would have a **total minor positive** effect when appraised against the SA Objectives, which is better than **Option 1** for which a **total minor negative** was recorded,*
- *Option 2 was subsequently selected as the council's preferred option on this basis,*
- *A strategic policy based on Option 2 would introduce an **additional minor positive scoring policy** to the plan (i.e., when considering the total policy score for that option), which would be consistent with the **minor positive scores** recorded for the remaining strategic policies,*
- *A strategic policy based on Option 2 would decrease the total positive effects of the Strategic Policies against SA Objectives 3 & 8, however these would still record **minor positive scores**,*
- *A strategic policy based on Option 2 would increase the total positive effects of the Strategic Policies against SA Objective 16 from **neutral to minor positive**, and*
- *A strategic policy based on Option 2 would have **no impact** on the total effects of the plan as a whole (as recorded in the 2018 SA Report).*

3.8 The results of the appraisal demonstrate that the council's preferred option would have positive results when assessed as an individual policy. When read alongside the existing, remaining policies, if such a policy was introduced to the Plan Strategy its inclusion would result in no impact, implications or changes to how the plan as a whole would perform against the SA Objectives as reported in the 2018 SA Report.

## 4 Conclusions & recommendations

- 4.1 This addendum highlights the effects that the required modifications to the dPS have had with regards to the original Sustainability Appraisal published in August 2018.

### Screening process

- 4.2 The initial screening process concluded that 76 of the modifications detailed in Schedule 1 of the direction could be 'screened out' by virtue of their nature, and a detailed sustainability appraisal was not required.
- 4.3 These modifications will have no effect on the overall outcomes of the 2018 SA Report.

### Detailed appraisal

- 4.4 Modifications MOD05 and MOD06 were screened in, and a detailed assessment has been carried out on the proposed Strategic Policy SP1A that would address both. Reasonable alternatives were considered and fully appraised against the SA Objectives, and the council selected its preferred option. Subsequent assessments were carried out to determine the total policy score for the council's preferred option, total effects score, and to show how the appraised policy sits alongside the remainder of the dPS.
- 4.5 The council's preferred option would perform well as an individual policy with a minor positive SA score. Crucially, its inclusion within the dPS alongside the existing policies would result in no impact or change to how the dPS as a whole would perform against the SA Objectives.
- 4.6 The introduction of this policy to the dPS, to address modifications MOD05 and MOD06, would have no effect on the overall outcomes of the 2018 SA Report.

## Summary

- 4.7 The results of this report demonstrate that all of the required modifications to the dPS can be made without impacting or changing how the plan as a whole would perform against the SA Objectives.

## 5 Next stages

- 5.1 This Addendum to the SA Report 2018 has been published alongside the Draft Plan Strategy Modifications Consultation Overview for consultation, and incorporates the Environmental Report as required by the SEA Directive. It presents the integrated findings of the combined SA and SEA of the required modifications set out in the direction from DfI, including the assessment of reasonable alternatives and recommendations for mitigating and monitoring significant effects.
- 5.2 The results of this addendum demonstrate therefore that all the recommended modifications can be made without having any implications on the overall performance of the dPS against the SA Objectives. The originally published results and assumptions as set out in the 2018 report would remain unchanged.

### **What happens next?**

- 5.3 The plan-making process will continue to follow the stages as detailed in the SA Report 2018.
- 5.4 Following publication of the Draft Plan Strategy Modifications Consultation Overview and this SA Addendum, representations are invited through the subsequent consultation process. Modifications to both may be made in response to consultation, and any significant changes to the plan will be subject to additional appraisal.
- 5.5 SEA Regulations require the council to produce a formal, post-adoption SA Statement to accompany the Plan Strategy, as soon as reasonably possible after its adoption. The purpose of the post-adoption statement is to outline how the SA process has informed and influenced the plan preparation and decision-making process and demonstrate how consultation on the SA was taken into account. The statement will include the modifications appraised through this addendum and any responses received to it through the consultation process.

## Consultation arrangements

- 5.6 In line with the consultation arrangements set out in the SA Report August 2018, this addendum will be available for consultation alongside the Draft Plan Strategy Modifications Consultation Overview, for a statutory consultation period of **eight weeks**, from **12 May** to **07 July 2022**.
- 5.7 You can respond to this consultation exercise online at [www.yoursay.belfastcity.gov.uk](http://www.yoursay.belfastcity.gov.uk), by emailing [localdevelopmentplan@belfastcity.gov.uk](mailto:localdevelopmentplan@belfastcity.gov.uk) or by post to:

**Belfast Planning Service  
Cecil Ward Building  
4-10 Linenhall Street  
BELFAST  
BT2 8BP  
02890 500510**

- 5.8 All the relevant documentation will be available online at [www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP) from **12 May 2022**. They will also be available for inspection at the main reception in Belfast City Hall during normal public opening hours.

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Belfast City Hall  
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02890 320202**



## 6 Appendices

6.1 This Addendum to the SA Report 2018 is accompanied by two appendices:

- *Appendix 1: Screening assessment of Required Modifications*
- *Appendix 2: Detailed Sustainability Appraisal*

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# Belfast Local Development Plan

**Second SA Addendum April 2023**

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

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



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## Executive Summary

This document comprises a **Second Addendum** to the **Sustainability Appraisal (SA) Report August 2018**, one of the plan documents prepared for Belfast City Council's draft Plan Strategy for the Local Development Plan 2035. It should be read in conjunction with the **SA Report August 2018** and the **SA Addendum May 2022**.

In February 2022 the Department for Infrastructure (Dfi) issued a direction to the council which required the council to address a number of required modifications to the draft Plan Strategy (dPS) in order for it to be considered 'sound'. To fulfil the obligations of the direction the council undertook a public consultation process which sought views on proposed additions and changes to the dPS and the SA Addendum May 2022.

In response to the representations made as part of this consultation, the council has made a number of changes to **Strategic Policy SP1A** and its supporting justification and amplification text.

This Second Addendum provides a full appraisal of these changes through the SA process, with the findings set out in **sections 2** and **3**.

This report highlights the effects that the changes have had in regard to the appraisals carried out in both the SA Addendum May 2022 (referred to hereafter as the 'First SA Addendum') and the initial SA of the dPS (referred to hereafter as the '2018 SA Report').

It demonstrates that the revisions to the policy can be made without impacting or changing how the plan as a whole would perform against the SA Objectives.



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## 1. Introduction

### Independent examination of the draft Plan Strategy

- 1.1 Following an independent examination in 2020/2021, the Planning Appeals Commission (PAC) produced a PAC Report of the dPS which concluded that, subject to modifications, the plan was considered to meet the relevant tests of soundness. DfI issued a direction to the council in February 2022 which directed it to address the required modifications as set out in Schedule 1 of the Direction, along with any necessary engagement and consultation, prior to formal adoption of the Plan Strategy.

### Post-examination modifications & consultation

- 1.2 To fulfil these obligations the council was required to undertake public consultation in relation to changes considered necessary to address the modifications referenced as MOD05, MOD06 and MOD11. In proposing these changes, the council also assessed the potential implications in respect of the associated dPS documentation, including the SA, and determined that an addendum to the 2018 SA Report was required to appraise the modifications through the SA process and highlight the effects that the modifications had in regard to the initial SA of the dPS. Accordingly, the council sought views on proposed additions and modifications to the dPS and the First SA Addendum through a formal consultation period from **12 May** to **07 July 2022**.
- 1.3 The council's **Post Independent Examination Consultation Report April 2023** provides a summary of the key issues raised through the consultation process. It should be read alongside a number of background documents, which have been added to the [Post Examination Modifications](#) section of the Local Development Plan (LDP) Document Library on the Belfast City Council website.

### Proposed changes to Strategic Policy SP1A

- 1.4 In response to the representations made as part of this consultation, the council has made a number of changes to **Strategic Policy SP1A** and its supporting justification and amplification text.

- 1.5 Any modifications to the dPS have the potential to change the appraisal of likely effects on social, economic and environmental interests. The revised Strategic Policy SP1A therefore requires further consideration through the SA and SEA process in order to highlight the effects that the changes may have in regard to the appraisals carried out in the First SA Addendum, and to determine if they alter the 'likely significant effects' predicted in the 2018 SA Report or if they may result in new likely significant effects.
- 1.6 This document therefore looks to identify whether, as a result of the proposed changes to the policy, the outcomes of the first addendum should be varied from those originally reported. As such, whilst this addendum is a full SA of the revised Strategic Policy SP1A, it should still be read in conjunction with both the First SA Addendum and the 2018 SA Report.
- 1.7 **Appendix 2** to this addendum clarifies the proposed revisions to the policy and should be read alongside the council's **Post Independent Examination Consultation Report April 2023**, which outlines the detailed reasoning for the proposed revisions to the policy and its supporting text.

#### Statutory Requirements

- 1.8 The SA must assess the social and economic effects of the LDP as well as the environmental effects. It therefore must comply with EU SEA Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (SEA Directive). The SEA Directive is transposed into Northern Ireland legislation through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP(NI) Regulations).
- 1.9 This second addendum to the SA Report August 2018 has been prepared by Belfast City Council in accordance with:
- *Sections 8(6) and 9(7) of the Planning Act (Northern Ireland) 2011,*
  - *Regulation 15 and 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, and*
  - *The Environmental Assessment of Plans & Programmes Regulations (Northern Ireland) 2004 (EAPP).*

## 2. Detailed assessment of changes to revised Strategic Policy SP1A

2.1 The proposed changes to Strategic Policy SP1A are fully documented in the council's **Post Independent Examination Consultation Report April 2023**.

2.2 The detailed SA of revised Strategic Policy SP1A is set out in full in **Appendix 1** to this addendum.

### Reasonable alternatives & preferred option

2.3 **Narrative Table A1** in **Appendix 1** sets out the council's consideration of reasonable alternatives.

2.4 This clarifies that when carrying out the First SA Addendum, the council appraised the sustainability impacts of two policy options.

2.5 '**Option 1**' reflected an interpretation of the approach suggested in paragraph 3.42 of the PAC Report. Within this the PAC offered a form of wording based on the need for a strategic policy on phasing. Whilst there was no need to replicate the wording, for the purpose of this exercise, the policy option was assessed based on the form of wording provided in paragraph 3.42.

2.6 '**Option 2**' represented the council's response and was a strategic policy which had a similar effect to the PAC's form of wording, but with more flexibility in-built, referring to existing provisions within the broader draft Plan Strategy (most notably Policies EC2 and HOU1) and the need for phasing within the Local Policies Plan (LPP).

2.7 The results documented in the First SA Addendum determined that **Option 2** performed better and resulted in a likely positive SA score. It was therefore selected as the council's **preferred option** at that time.

2.8 Following the consultation process a number of changes have now been made to Strategic Policy SP1A. This revised version, referred to as '**Option 3**', builds on the previous text of Option 2 to provide greater clarity in relation to the 'first phase' in advance of LPP, as well as work beyond this first phase.

- 2.9 Option 3 has now been fully appraised as a further, reasonable alternative to Option 2. For full transparency the initial appraisal of Option 1 and Option 2 has been included for comparison alongside the appraisal of Option 3.
- 2.10 The assessment scoring used the effects identified reflect the same methodology and formulas as used in the First SA Addendum. These are provided again in **Figures 2 – 5** of **Appendix 1**.

#### Detailed appraisal

- 2.11 The detailed SA of Option 3 includes the relevant assessment matrices against the SA Objectives. This is set out in **Table A2** in **Appendix 1**.
- 2.12 Subsequent assessments were then carried out to determine the total policy score and the total effects of the revised policy against the SA Objectives. These are set out in **Tables A3 – A7** in **Appendix 1**.
- 2.13 Finally, it was determined how the policy would sit alongside the remainder of the dPS policies; and whether its introduction would influence or impact the effects of the plan as a whole against the SA Objectives. This is provided in **Table A8** of **Appendix 1**.
- 2.14 **Table 1** below provides a full summary of the detailed work in **Appendix 1**, alongside the subsequent conclusions and outcomes.

Table 1: SA summary of revised Strategic Policy SP1A

Consideration of reasonable alternatives	
Summary	Outcome of appraisal
<p>Clarifies where reasonable alternatives were identified for the policy option, and if not, the reasons why they were scoped out. Includes:</p> <ul style="list-style-type: none"> <li>• Reasons for alternatives considered</li> <li>• Detailed consideration of social, economic &amp; environmental effects of proposed policy and reasonable alternative</li> <li>• Reasons for choosing preferred option</li> <li>• Mitigation</li> <li>• Timescale of effect</li> </ul>	<p>For the reasons set out in the First SA Addendum, 'No policy' was <b><i>not considered a reasonable alternative</i></b> and was scoped out from the outset. Two options were then identified as being reasonable alternatives:</p> <ul style="list-style-type: none"> <li>• <b>Option 1; 'Prescriptive phasing policy'</b> reflects the PAC's suggested wording in paragraph 3.42 of the PAC Report and envisages a strict separation of land into specific phasing.</li> <li>• <b>Option 2; 'Strategic policy plus LPP'</b> the council's first proposed version, which had a similar effect to the PAC's suggested wording but with more flexibility.</li> </ul> <p><i>Option 2 was selected as the council's preferred option in the First SA Addendum on the basis that it scored higher, and the overall appraisal against the SA Objectives was more positive.</i></p> <p>Following the consultation process, Strategic Policy SP1A has been revised and thus provides a third option:</p> <ul style="list-style-type: none"> <li>• <b>Option 3; 'Strategic policy plus LPP, revised version'</b> the council's revised version of draft Policy SP1A, which must now be appraised as a further alternative to Option 2.</li> </ul>

Assessment matrix for new policy option	
Summary	Outcome of appraisal
<p>Assessment matrix that appraises Options 2 and 3.</p> <p><i>*For clarity the matrix also includes the full appraisal of Option 1 (as recorded in the First SA Addendum).</i></p>	<ul style="list-style-type: none"> <li>• <i>* Option 1 scored -5, which equated to a minor negative total score.</i></li> <li>• Option 2 scored +6, which equated to a minor positive total score.</li> <li>• Option 3 scores +8, which equates to a minor positive total score.</li> </ul> <p>This demonstrates that whilst Option 3 would retain the overall <b>minor positive</b> score as recorded by Option 2 in the First SA Addendum (<i>* and would subsequently perform better than Option 1</i>), it would <b>perform better</b> against the individual SA Objectives (SAOs) than Option 2.</p> <p><b>For these reasons Option 3, the revised Strategic Policy SP1A, has now been chosen as the council's preferred option.</b></p>
Total Strategic Policy scores	
Summary	Outcome of appraisal
<p>Scoring matrix of the council's preferred policy option, alongside the other Strategic Policies to show updated total scores of all Strategic Policies.</p>	<p>The total policy score for the council's preferred option is a <b>minor positive</b>, which would sit alongside the minor positive scores recorded for all other Strategic Polices.</p>
All Policy Scores	
Summary	Outcome of appraisal
<p>Table showing the total scores of all dPS policies.</p>	<p>The total scoring for all policies in the plan has been updated to include the council's preferred option, which introduces an additional <b>minor positive impact</b>.</p>

Total Effects of Strategic Policies on SA Objectives	
Summary	Outcome of appraisal
<p>Scoring matrix of all six Strategic Policies appraised, to show the updated total effects of each Strategic Policy against the SA Objectives. Also includes a comparison with the total effects of the five Strategic Policies that were previously appraised in the 2018 SA Report (i.e., not including new policy SP1A).</p>	<p>Introducing the revised Strategic Policy SP1A as the council's preferred option has affected eleven individual scores.</p> <p>Of these, the final total effects have changed for <b>three SA Objectives</b>:</p> <ul style="list-style-type: none"> <li>• 1 is <b>more positive</b> with a change from <b>neutral to minor positive</b> (SAO 16),</li> <li>• 2 are <b>less positive</b> with changes from <b>significant positive to minor positive</b> (SAOs 3 &amp; 8).</li> </ul>
Total Effects of the LDP	
Summary	Outcome of appraisal
<p>Scoring matrix showing the total plan effects, with the total scores of all plan policies within each of the six themes shown against the SA Objectives. Also includes a comparison with the total plan effects from the 2018 SA Report (i.e., not including new policy SP1A).</p>	<p>The SA of revised Strategic Policy SP1A as the council's preferred option demonstrates that its introduction into the Plan Strategy will have <b>no impact</b> on how the plan performs as a whole against the 19 SA Objectives.</p> <p>The results of the <b>2018 SA Report</b> will therefore be unaffected and will <b>remain unchanged</b>:</p> <p><i>Total Plan Effects against the SA Objectives, including revised Strategic Policy SP1A:</i></p> <ul style="list-style-type: none"> <li>• <b>14 x significant positive effects</b></li> <li>• <b>4 x minor positive effects</b></li> <li>• <b>1 x neutral effect</b></li> </ul>

## Summary

- 2.15 Having undertaken a detailed appraisal of revised Strategic Policy SP1A, it is concluded that:
- **Option 3**, the council's revised Strategic Policy SP1A, would have a total **minor positive** effect when appraised against the SA Objectives,
  - Whilst **Option 2** also recorded a total minor positive effect, the higher individual scores for **Option 3** demonstrate that it would perform better against the individual SA objectives,
  - **Option 3** was subsequently selected as the council's **preferred option**,
  - A revised strategic policy based on Option 3 would introduce an **additional minor positive scoring policy** to the plan (i.e., when considering the total policy score for that option), which would be consistent with the **minor positive scores** recorded for the remaining Strategic Policies,
  - A revised strategic policy based on Option 3 would decrease the total positive effects of the Strategic Policies as a group against SA Objectives 3 & 8, however these would still record **minor positive scores**,
  - A revised strategic policy based on Option 3 would increase the total positive effects of the Strategic Policies as a group against SA Objective 16 from **neutral to minor positive**, and
  - A revised strategic policy based on Option 3 would have **no impact** on the total effects of the plan as a whole (as recorded in the 2018 SA Report).
- 2.16 The results of the appraisal demonstrate that the proposed changes to the policy would result in **higher** positive policy scores when compared to the previous version, Option 2, which was selected as the preferred option through the First SA Addendum. The total effects of the Strategic Policies against the SA Objectives, and the total effects of the plan as a whole, would **remain unchanged** from both the First SA Addendum and the 2018 SA Report.
- 2.17 When read alongside the existing, remaining policies, the introduction of revised Strategic Policy SP1A to the Plan Strategy would result in **no impact, implications** or **changes** to how the plan as a whole would perform against the SA Objectives as reported in the 2018 SA Report.



### **3. Conclusions & recommendations**

- 3.1 This Second SA Addendum highlights the effects that the proposed changes to Strategic Policy SP1A have had with regards to the appraisals published in the First SA Addendum and the 2018 SA Report.
- 3.2 The revised Strategic Policy SP1A would have additional positive results when compared to the previous version and would perform better against the SA objectives. It was therefore considered a suitable reasonable alternative to the previous, and on the basis of its SA score, the council selected it as its preferred option.
- 3.3 Subsequent appraisals were then carried out to determine the total policy score, the total effects score, and to show how the revised policy sits alongside the remainder of the dPS. These show that the revised policy would perform well as an individual policy with a minor positive SA score. Crucially, and as with the previous version, its inclusion within the dPS alongside the existing policies would result in no impact or change to how the dPS as a whole would perform against the SA Objectives.
- 3.4 In conclusion, the introduction of this revised policy to the dPS, to address modifications MOD05 and MOD06, would have no effect on the overall outcomes of the First SA Addendum or the 2018 SA Report.

#### Summary

- 3.5 Having considered the results of this appraisal, the council is satisfied that the proposed revisions to Strategic Policy SP1A can be made, and the new policy incorporated within the Plan Strategy, without impacting or changing how the plan as a whole would perform against the SA Objectives.



## 4. Next stages

- 4.1 This Second SA Addendum to the 2018 SA Report has been published alongside the **Draft Plan Strategy Post Independent Examination Consultation Report April 2023**, and incorporates the Environmental Report as required by the SEA Directive. It presents the integrated findings of the combined SA and SEA of the council's revised Strategic Policy SP1A, including the assessment of reasonable alternatives and recommendations for mitigating and monitoring significant effects.
- 4.2 The results of this addendum demonstrate that the revisions to the policy can be made without having any implications on the overall performance of the dPS against the SA Objectives. Its incorporation into the plan would not change the results and assumptions as set out in both the First SA Addendum and the 2018 SA Report.

### What happens next?

- 4.3 In line with the EAPP regulations<sup>20</sup> Consultation Procedures, Part III, 12., the council is required to publish notice to the public and to share the Second SA Addendum with the consultation body. Any comments received as a result of this process must be fully considered by the council before progressing further with the plan-making process
- 4.4 The plan-making process will then continue to follow the stages as detailed in the SA Report 2018.
- 4.5 SEA Regulations require the council to produce a formal, post-adoption SA Statement to accompany the Plan Strategy, as soon as reasonably possible after its adoption. The purpose of the post-adoption statement is to outline how the SA process has informed and influenced the plan preparation and decision-making process and demonstrate how consultation on the SA was taken into account.
- 4.6 The post-adoption statement will include the revisions to Strategic Policy SP1A that have been appraised through this addendum, in addition to those documented in the First SA Addendum and all responses received to it through the consultation process.

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<sup>20</sup> [EAPP \(NI\) Regulation 12](#)



## 5. Appendices

5.1 This Second SA Addendum to the SA Report 2018 is accompanied by two appendices:

- *Appendix 1: Detailed Sustainability Appraisal of Revised Strategic Policy SP1A*
- *Appendix 2: Summary of revisions to Strategic Policy SP1A*

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