



Belfast Local Development Plan

Addendum May 2022 - Appendix 2

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



Belfast
City Council

Energising
Belfast

Appendix 2

Detailed Sustainability Appraisal

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1. Sustainability Objectives

Figure 1: SA Objectives

Theme	SA OBJECTIVES
Social	1. Reduce deprivation and encourage an inclusive and equal society
	2. Improve health and wellbeing for an improved quality of life.
	3. To provide opportunity for good quality housing and enable people to meet their housing needs
	4. Increase community safety by supporting the reduction of crime and antisocial behaviour
	5. To improve skills & education of residents by providing high quality, accessible lifelong learning opportunities
	6. Retain and enhance access to local services and facilities
Economic	7. To ensure local residents have access to employment opportunities
	8. Support economic development of Belfast as a competitive place & contribute to its role as a regional economic driver
	9. Promote an integrated transport system and encourage sustainable travel
Environmental	10. Maintain and enhance biodiversity assets, protect habitats and species
	11. Protect and enhance soil quality
	12. Protect, enhance & manage the quality of the built & historic environment
	13. Protect, maintain & enhance the quality of Belfast's distinctive landscape & geodiversity.
	14. Protect and enhance open space and natural greenspace including Belfast's countryside asset
	15. Promote the sustainable management of waste
	16. Promote the quality and efficient use of water resources
	17. Reduce air pollution and ensure continued improvements to air quality
	18. Support the transition to a Low Carbon Economy
	19. Support the adaptation to Climate Change and effectively manage flood risk

2. Appraisal scoring methodologies & formulas

Figure 2: SA Appraisal Key (applicable to all tables)

-- Significant Negative	- Minor Negative	? Unknown Effect	+/- Mixed Effects	0 No Effect or Relationship	+ Minor Positive	++ Significant Positive
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Figure 3: Policy scoring ranges (to calculate total scores in Tables A3, A4, A6 & A7)

Effect Scoring: Applicable to all Effects							
Likely Effect	-- Significant Negative	- Minor Negative	? Unknown Effect	+/- Mixed Effects	0 No Effect or Relationship	+ Minor Positive	++ Significant Positive
Ranking Score	-2	-1	0	0	0	1	2

Figure 4: Policy scoring formula (to calculate what effect the total policy score equates to in Tables A3 & A4)

Individual Policy - Scoring Formula & Range						
FORMULA	19 Objectives multiply by 2		=	Minor Range		Significant Range
Negative scoring	-19 x 2		=	-1 to -19	-	-20 to -38 --
Positive scoring	19 x 2		=	1 to 19	+	20 to 38 ++
Unknown, mixed, no effect	?	+/-	0	=	0 score	

Figure 5: Updated total effects scoring formula (to calculate what effect the total effects score equates to – for Strategic Policies in Table A6 and all Plan Policies in Table A7)

Total Effects: Updated Scoring Formula & Range (Strategic Policies & All Plan Policies)								
FORMULA	6 Policies*/themes Multiply by 2 (previously 5 policies)			=	Minor Range		Significant Range	
Negative scoring	-6 x 2			=	-1 to -6	-	-7 to -12	--
Positive scoring	6 x 2			=	1 to 6	+	7 to 12	++
Unknown, mixed, no effect	?	+/-	0	=	0 score			

*9 policies in total, however 3 are appraised later in the 2018 SA Report, so the formula only requires 6 to be multiplied by two

3. Sustainability appraisal

Table A2: Narrative Table – Consideration of reasonable alternatives for new policy SP1A

STRATEGIC POLICIES									
Policy name	SP1A – MANAGING GROWTH AND SUPPORTING INFRASTRUCTURE DELIVERY								
Reasons for Alternatives Considered	<p>The draft Plan Strategy did not contain a strategic policy relating to the management of growth to align with infrastructure. It instead referenced the need for growth to be aligned with infrastructure investment over the plan period within the justification and amplification text associated with Policy SP1 Growth Strategy as well as Policies HOU1 and EC2. However, following the Independent Examination of the draft Plan Strategy the Planning Appeals Commission's (PAC) suggested through recommended amendment 'RA05' of their report the need for a "strategic policy on phasing". A form of wording was outlined at Paragraph 3.42, which also highlighted the potential need for the SA/SEA to be revisited.</p> <p>In addition, 'RA06' and Paragraph 3.43 of the PAC report also suggested the need for all uncommitted land to be developed during the plan period to be subject to the availability of adequate sewerage infrastructure in order to ensure deliverability of the growth strategy. This same paragraph advised that amendment RA06 could be incorporated into the same policy that would address the issue of phasing.</p> <p>Both RA05 and RA06 of the PAC report were reiterated through required modifications 'MOD05' and 'MOD06' detailed in Schedule 1 of the direction issued to the council by the Department for Infrastructure (DfI).</p> <p>The council has developed two options for the strategic policy to deal with the issues above:</p> <p>Option 1 reflects the wording suggested in the PAC report to address RA05/MOD05 and RA06/MOD06. It is referred to as the 'Prescriptive phasing policy', as it envisages a strict separation of land into specific phasing.</p> <p>Option 2 represents the Council's response to RA05/MOD05 and RA06/MOD06 and is referred to as the "Strategic policy plus LPP". It is a strategic policy that has a similar effect to the PAC's proposed 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).</p> <p>Whilst the Council's initial preferred approach was to have no such policy, the PAC report and subsequent direction from DfI make it clear that such a policy is required to make the Plan Strategy sound. A 'No policy' option is therefore no longer considered to be a reasonable alternative and has been scoped out.</p>								
Option	<table border="1"> <thead> <tr> <th>Option 1 Prescriptive phasing policy</th> <th>Option 2 Strategic policy plus LPP</th> </tr> </thead> <tbody> <tr> <td>A policy based on the phasing of land so that only committed housing and employment developments (i.e. those with extant planning permission) can be delivered prior to any further infrastructure investment. New, Phase 2 sites, would then only be released for development when it is established that the necessary water and sewerage infrastructure is in place.</td> <td>Strategic policy that flags up the role that infrastructure capacity has to play in delivering growth and to alert developers to the need for associated infrastructure to be available to enable development. It references the role of the LPP in managing growth through new zonings, phased as required to take account of existing commitments, projected requirements and infrastructure provision.</td> </tr> <tr> <td>Significant negative effects: Providing good quality housing Minor negative effects: Access to local services and facilities</td> <td>Minor positive effects: Access to local services and facilities Minor negative effects: Providing good quality housing</td> </tr> <tr> <td>Significant negative effect: Ensuring increased access to employment opportunities; Allowing Belfast to compete economically and encouraging sustainable travel Minor negative effects: Integrated transport and sustainable travel</td> <td>Minor positive effect: Integrated transport and sustainable travel Minor negative effects: Ensuring increased access to employment opportunities; Allowing Belfast to compete economically and encouraging sustainable travel</td> </tr> </tbody> </table>	Option 1 Prescriptive phasing policy	Option 2 Strategic policy plus LPP	A policy based on the phasing of land so that only committed housing and employment developments (i.e. those with extant planning permission) can be delivered prior to any further infrastructure investment. New, Phase 2 sites, would then only be released for development when it is established that the necessary water and sewerage infrastructure is in place.	Strategic policy that flags up the role that infrastructure capacity has to play in delivering growth and to alert developers to the need for associated infrastructure to be available to enable development. It references the role of the LPP in managing growth through new zonings, phased as required to take account of existing commitments, projected requirements and infrastructure provision.	Significant negative effects: Providing good quality housing Minor negative effects: Access to local services and facilities	Minor positive effects: Access to local services and facilities Minor negative effects: Providing good quality housing	Significant negative effect: Ensuring increased access to employment opportunities; Allowing Belfast to compete economically and encouraging sustainable travel Minor negative effects: Integrated transport and sustainable travel	Minor positive effect: Integrated transport and sustainable travel Minor negative effects: Ensuring increased access to employment opportunities; Allowing Belfast to compete economically and encouraging sustainable travel
Option 1 Prescriptive phasing policy	Option 2 Strategic policy plus LPP								
A policy based on the phasing of land so that only committed housing and employment developments (i.e. those with extant planning permission) can be delivered prior to any further infrastructure investment. New, Phase 2 sites, would then only be released for development when it is established that the necessary water and sewerage infrastructure is in place.	Strategic policy that flags up the role that infrastructure capacity has to play in delivering growth and to alert developers to the need for associated infrastructure to be available to enable development. It references the role of the LPP in managing growth through new zonings, phased as required to take account of existing commitments, projected requirements and infrastructure provision.								
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Summary									
Social Effects									
Economic Effects									

STRATEGIC POLICIES

Policy name	SP1A – MANAGING GROWTH AND SUPPORTING INFRASTRUCTURE DELIVERY	
Environmental Effects	<p>Significant positive effect: Protecting biodiversity, habitats and species; Promoting efficient use of water resources</p> <p>Minor positive: Protecting soil quality</p> <p>Minor negative effect: Reducing greenhouse gas emissions, air quality and transition to a low carbon economy</p>	<p>Significant positive effect: Protecting biodiversity, habitats and species; Promoting efficient use of water resources</p> <p>Minor positive effect: Protecting soil quality; Reducing greenhouse gas emissions, air quality and transition to a low carbon economy</p>
Reasons for Selecting Preferred Option	<p>Option 2 has been selected as the council’s preferred option. Whilst both options have a number of positive effects in relation to a number of environmental objectives, there are inherent negative implications in relation to some of the social and economic objectives of Option 1 as a result of the potential to constrain the provision of land for both new homes and new employment opportunities. The flexibility afforded by Option 2 however, and the ability to bring forward land through a plan-led approach as guided by the LPP, helps to mitigate some of these negative effects.</p>	
Mitigation	<p>Mitigation is afforded through the development management process to ensure sufficient infrastructure is in place, limiting impacts on biodiversity, flood risk, etc. The use of indicative annual rates within Policy HOU1 is also a measure which has been proposed as mitigation, in light of known infrastructure constraints in Belfast in the short term.</p> <p>The LPP process also affords the opportunity to further mitigate potential negative effects by ensuring, if required, that land is phased in an appropriate manner to take account of existing commitments, development requirements and infrastructure constraints. When allocating land as part of the LPP process, zonings can also minimise distances between resident population and their places of work.</p>	
Timescale of effect	<p>The difficulties facing the City’s sewerage infrastructure are current and ongoing and the timeframes for solutions, which sit outside of the LDP process, are not currently clear. The effects, both positive and negative, are therefore likely to be realised in the short-term and may continue through the medium and into the longer-term until such time as the constraints are rectified.</p>	

Table A3: SA assessment matrix for new policy SP1A

STRATEGIC POLICIES		SP1A Managing growth and supporting infrastructure delivery		
SA Objectives	Options		Comments	
	1	2		
Social	1	0	0	There is not considered to be any effect on or relationship with this SA objective.
	2	0	0	There is not considered to be any effect on or relationship with this SA objective.
	3	--	-	<p>Option 1 – Limiting growth to existing consents may serve to severely reduce the provision of good quality housing. This policy has an inherent lack of flexibility and may prevent development even where there exists infrastructure capacity, leading to a significant negative impact on this SA Objective.</p> <p>Option 2 – As with Option 1, limiting growth may severely reduce the provision of good quality housing, but a less strict approach, relying on detailed site assessment at LPP stage is likely to mitigate this to a certain extent, reducing the assessment to a minor negative.</p>
	4	0	0	There is not considered to be any effect on or relationship with this SA objective.
	5	0	0	There is not considered to be any effect on or relationship with this SA objective.
	6	-	+	<p>Option 1 – Extant consents are less likely than a plan-led approach to have regard to existing or future service provision, so this strict policy approach risks a disconnect between the location of new housing and local services and facilities needed to support them.</p> <p>Option 2 – A plan-led approach to delivering new residential development through the LPP will allow local infrastructure services and facilities to be effectively planned alongside.</p>
Economic	7	--	-	<p>Option 1 – Limiting growth to existing consents may serve to severely reduce the provision of new employment opportunities. This policy has an inherent lack of flexibility and may prevent development even where there exists infrastructure capacity. It is also more likely than a plan-led approach to risk a disconnect between the location of homes and job opportunities. It is therefore assessed to have a significant negative impact on this SA Objective.</p> <p>Option 2 – As with Option 1, limiting growth may severely reduce the provision of employment floorspace, but a less strict approach, relying on detailed site assessment at LPP stage is likely to mitigate this to a certain extent, reducing the assessment to a minor negative.</p>

STRATEGIC POLICIES		SP1A Managing growth and supporting infrastructure delivery		
SA Objectives	Options		Comments	
	1	2		
	8	--	-	<p>Option 1 – Limiting growth to existing consents may serve to severely reduce the provision of new opportunities for economic development. This policy has an inherent lack of flexibility and may prevent development even where there exists infrastructure capacity, leading to a significant negative impact on this SA Objective.</p> <p>Option 2 – As with Option 1, limiting growth may severely reduce the provision of new opportunities for economic development, but a less strict approach, is likely to mitigate this to a certain extent, reducing the assessment to a minor negative.</p>
	9	-	+	<p>Option 1 – Extant consents are less likely than a plan-led approach to have regard to existing or future service provision, so this strict policy approach risks a disconnect between the location of homes and jobs and services, undermining opportunities for sustainable travel.</p> <p>Option 2 – A plan-led approach to delivering new homes and employment floorspace through the LPP will allow local better spatial synergy, helping support the plan's objectives to promote integrated and sustainable travel.</p>
Environmental	10	++	++	<p>Both options will ensure that the appropriate wastewater treatment and sewerage infrastructure is in place to enable development without the risk of untreated wastewater damaging any biodiversity habitats, protected habitats or species.</p> <p>The stricter policy approach of Option 1 seeks to introduce a blanket approach to the restriction of development at an early stage. Option 2, through a strategic policy approach, seeks to provide scope for development on an ongoing basis based on the individual circumstances and the ability to address the obligations in respect of appropriate infrastructure alongside the required safeguards. This is likely to include those provisions which will support the protection and enhancement of biodiversity, including protected habitats and species.</p>
	11	+	+	<p>Both options will ensure that the appropriate wastewater treatment and sewerage infrastructure is in place to enable development without the risk of untreated wastewater leaching into soil or watercourses. This is only likely to be a minor positive effect in both cases.</p>
	12	0	0	There is not considered to be any effect on or relationship with this SA objective.
	13	0	0	There is not considered to be any effect on or relationship with this SA objective.
	14	0	0	There is not considered to be any effect on or relationship with this SA objective.
	15	0	0	There is not considered to be any effect on or relationship with this SA objective.

STRATEGIC POLICIES		SP1A Managing growth and supporting infrastructure delivery		
SA Objectives	Options		Comments	
	1	2		
	16	++	++	Both options will ensure that the appropriate wastewater treatment and sewerage infrastructure is in place to prior to development being approved as part of the development management process.
	17	-	+	Option 1 – As a strict policy approach risks a disconnect between the location of homes and jobs and services, it could serve to undermine opportunities for sustainable travel options, with associated negative effects on pollution and air quality. Option 2 – A plan-led approach to delivering new homes and employment floorspace through the LPP will allow local better spatial synergy, helping support the plan’s objectives to promote integrated and sustainable travel, which could in turn have a minor positive effect by reducing pollution and air quality.
	18	-	+	Option 1 – As with SA9, extant consents may have little regard to existing or future service provision, so a strict policy approach risks a disconnect between the location of homes and jobs and services. This could undermine opportunities for sustainable travel and greater reliance on longer journeys and private car use, with consequent implications for greenhouse gas emissions. Option 2 – As with SA9, a plan-led approach to delivering new homes and employment floorspace through the LPP will allow local better spatial synergy, helping support the plan’s objectives to promote integrated and sustainable travel, with consequential positive implications for reducing greenhouse gases and transitioning to a low carbon economy.
	19	0	0	There is not considered to be any effect on or relationship with this SA objective.
Summary	Options		Comments	
	1	2		
Total scores	- 5	6	Option 1 scores -5, which equates to a minor negative total score Option 2 scores 6, which equates to a minor positive total score This demonstrates that Option 2, as the council’s preferred option, would perform better against the SA objectives.	

Table A4: Updated Total Strategic Policy scores, including new policy SP1A

STRATEGY →		STRATEGIC POLICIES								
POLICY →		SP1	SP1A	SP2	SP3	SP4	SP5	SP6	SP7	SP8
Social	SA1	++	0	+	Appraised under draft Policy HC1	+	++	Appraised under draft Policies ENV2 & ENV3	++	Appraised under draft Policy GB1
	SA2	+	0	+		+	++		++	
	SA3	+	-	+		++	+		+	
	SA4	0	0	+		+	+		0	
	SA5	0	0	+		?	0		0	
	SA6	++	+	+		?	+		+	
Social Scoring		6	0	6		5	7		6	
Economic	SA7	++	-	+		?	+		+	
	SA8	+	-	+		+	+		++	
	SA9	+	+	+		?	+		++	
Economic Scoring		4	-1	3		1	3		5	
Environmental	SA10	-	++	+		0	+		0	
	SA11	+	+	+		0	0		0	
	SA12	++	0	+		0	+		+	
	SA13	+	0	+		0	+		0	
	SA14	+/-	0	+		0	+		0	
	SA15	+	0	-		0	0		0	
	SA16	+/-	++	+/-		0	0		0	
	SA17	+	+	+		0	+		++	
	SA18	+	+	+	0	+	++			
	SA19	+/-	0	+	0	+	++			
Environmental Scoring		6	7	7	0	7	7			
Total Policy Score		SP1	SP1A	SP2	SP3	SP4	SP5	SP6	SP7	SP8
		16	6	16		6	17		18	
		+	+	+		+	+		+	

Impact: The total policy score for Policy SP1A is a minor positive

Table A5: Updated All Policy Scores table, including new policy SP1A

ALL POLICY SCORE																															
Strategic Policies	SP1	SP1A	SP2	SP3 (HC1)		SP4	SP5	SP6 & ENV2	ENV3	SP7	SP8 (GB1)																				
Spatial Development	SD1	SD2	SD3																												
Shaping a Liveable Place	HOU1	HOU2	HOU3	HOU4	HOU5	HOU6	HOU7	HOU8	HOU9	HOU10	HOU11	HOU12	HOU13	DES1	DES2	DES3	DES4	RD1	RD2	RD3	BH1	BH2	BH3	BH4	BH5	BH6	CGR1	CGR2	HC1	CI1	CI2
Creating a Vibrant Economy	EC1	EC2	EC3	EC4	EC5	EC6	EC7	RET1	RET2	RET3	RET4	RET5	RET6	CC1	TLC1	TLC2	TLC3	TLC4													
Building a Smart Connected Resilient Place	ITU1	ITU2	ITU3	ITU3	W1	W2	W3	W4	W5	M1	TRAN1	TRAN2	TRAN3	TRAN4	TRAN5	TRAN6	TRAN7	TRAN8	TRAN9	TRAN10	TRAN11	TRAN12	ENV1	ENV2	ENV3	ENV4	ENV5				
Promoting a Green & Active Place	GB1	OS1	OS2	OS3	OS4	OS5	OS6	OS7	NH1	TRE1	LC1	LC2	LC3	LC4	DC1	DC2	DC3	DC4	DC5	DC6	DC7	DC8	DC9	DC10	DC11	DC12	DC13				

Impact: The total scoring for all policies in the plan has been updated to include SP1A, which introduces an additional positive impact

Table A6: Updated Total Effects of the Strategic Policies on the SA Objectives, including new policy SP1A

STRATEGY	POLICY	Social						Economic			Environmental									
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19
STRATEGIC POLICIES	SP1	++	+	+	0	0	++	++	+	+	-	+	++	+	+/-	+	+/-	+	+	+/-
	SP1A	0	0	-	0	0	+	-	-	+	++	+	0	0	0	0	++	+	+	0
	SP2	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	+/-	+	+	+
	SP3	Appraised under draft Policy HC1																		
	SP4	+	+	++	+	?	?	?	+	?	0	0	0	0	0	0	0	0	0	0
	SP5	++	++	+	+	0	+	+	+	+	+	0	+	+	+	0	0	+	+	+
	SP6	Appraised under draft Policies ENV2 & ENV3																		
	SP7	++	++	+	0	0	+	+	++	++	0	0	+	0	0	0	0	++	++	++
	SP8	Appraised under draft Policy GB1																		
SA Objective		1	2	3	4	5	6	7	8	9*	10	11	12	13	14	15	16	17	18	19
Previous Total Effects (scoring formula based on 5 policies)		8	7	6	3	1	5	5	6	5*	1	2	5	3	2	0	0	5	5	4
		++	++	++	+	+	+	+	++	+	+	+	+	+	+	0	0	+	+	+
Updated Total Effects (scoring formula based on 6 policies)		8	7	5	3	1	6	4	5	6	3	3	5	3	2	0	2	6	6	4
		++	++	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+

Impact: The introduction of SP1A has affected ten individual scores.

Of these, based on the updated scoring formula, the final total effects have now changed for three SA Objectives:

The total positive effects of the Strategic Policies on SA Objectives 3 & 8 have **decreased from significant positive to minor positive** (yellow boxes)

The total effects of the Strategic Policies on SA Objective 16 have **increased from neutral to minor positive** (green boxes)

* Mistake from 2018 SA Report corrected for SA Objective 9 – previously shown total effects score of 'o' & 'o' corrected to '5' & '+'. Policy SP1A has no impact on this

* This correction has no impact on the final 'All Policy' scores. The Total Effects of the LDP table has been updated to reflect the same correction

Table A7: Updated Total Effects of the LDP, including new policy SP1A

Total Effects of the LDP																			
SA Sustainability Objectives →																			
LDP ↓	SOCIAL						ECONOMIC			ENVIRONMENTAL									
	1	2	3	4	5	6	7	8	9*	10	11	12	13	14	15	16	17	18	19
Strategic Policies	++	++	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+
Spatial Development	++	+	+	+	+	++	+	+	0	+	+	+	+	+	-	0	+	+	+
Shaping a Liveable Place	+	++	++	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	+
Creating a Vibrant Economy	++	++	+	+	+	+	++	++	+	+	+	+	+	+	-	+	+	+	+
Building a Smart Connected Resilient Place	+	++	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	+
Promoting a Green & Active Place	++	+	++	+	0	+	+	++	+	++	++	++	++	++	0	++	++	++	++
PREVIOUS TOTAL PLAN EFFECTS	10	10	9	6	5	7	7	11	5*	7	7	7	7	7	0	5	7	7	7
UPDATED TOTAL PLAN EFFECTS	10	10	8	6	5	7	7	10	5	7	7	7	7	7	0	6	7	7	7

Impact: The introduction of SP1A has impacted the total effects of three Strategic Policies, with two decreasing and one increasing, however when these are equated into effect, there is no impact on the 'total effect' of the plan as a whole on any SA Objective.

* Previous total effects of Strategic Policies against SA Objective 9 updated to correct typing error from 2018 SA Report – '0' score now corrected to '5'

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