

Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
January to March 2021 (Version 1)

Continued public hearing sessions to be held during the period from Monday 18th January – Friday 8th March 2021

Topics 11 - 28

Notes:

- *This agenda should be read in conjunction with the guidance notes for participants.*
- *Participants' contributions should focus on the questions in this agenda.*
- *The discussion will concern the soundness and legal compliance of the submitted plan. Anything that does not relate to these subjects (for example, that certain parties have chosen not to make representation on specific issues) will not be discussed.*
- *The tests of soundness are set out in Development Plan Practice Note 6 "Soundness".*
- *It is not the Commissioners' role to make the plan more sound.*
- *When referring Commissioners to submitted evidence, legislation, policy or guidance please identify the page, paragraph, section etc as appropriate.*
- *Participants should have regard to the policies in the submitted plan and the Council's suggested modifications which are set out in Section 7 of its "Draft Plan Strategy – Public consultation report August 2019". This is document SD006 Draft Plan Strategy public consultation report & Appendices A,B,C,&D 1-7 (PDF 6.2 MB) ([Link](#))*
- *Participants proposing changes or deletions to policies should provide evidence-based justification and, if possible, suggest appropriate wording.*

Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Monday 18th January 2021 and Tuesday 19th January 2020

Opening Notes (RD & JdeC)

Topic 11 – Vision, aims and objectives

Building a smart connected and resilient place (JdeC)

1. In response to a representation, the Council suggests a “*minor change*” to the second sentence of the “Aims” whereby it would read: “*...improve air quality and promote increased use of public transport whilst retaining **appropriate** provision for cars*”.
 - a. Under what dPS provision will “*appropriate provision for cars*” be determined?
 - b. Does a definition need to be added to the dPS Glossary to ensure that there would be clear mechanisms for implementation and monitoring?
 - c. The Council set out its rationale for this amendment at Section 7.3 of the “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) (page 450). Over and above the rationale set out there is there anything that it wishes to add in this respect?

2. In response to a representation, the Council suggests a “*minor change*” to the second objective for “*Building a smart connected and resilient place*” [in the purple text box] so that it would read: “*To ensure availability of land to facilitate sustainable patterns of development whilst supporting demand management measures to encourage travel by more sustainable modes of transport*”.
 - a. What does the Council mean by “*demand management measures*”?
 - b. Does a definition need to be added to the dPS Glossary to ensure that there would be clear mechanisms for implementation and monitoring?
 - c. The Council set out its rationale for this amendment at Section 7.3 of the “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) (page 450). Over and above the rationale set out there is there anything that it wishes to add in this respect?

Any other issues

Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Monday 18th January 2021 & Tuesday 19th January 2021

Topic 12: Strategic Policies

Growth Strategy

Population Growth (RD)

1. The Housing Growth Options paper notes the current Belfast LGD had a population of 336,830 in 2014. Figure 3.17 of the Housing Growth Options Report illustrates sub national population projections from 2014 to 2035. Paragraph 4.6 of Technical Supplement 1 states that in 2017, the new Belfast City Council Area had an estimated population of 340,220. It also states that by 2026 the population is estimated to rise to 346,200 which is a 17.8% increase of the NI population.
 - a. Are the populations projections as outline in the supporting evidence in line/on target with the projections set out by Figure 3.17 of the Housing Growth Options Report for the period 2014 to 2035?
 - b. Is there any update on these population figures?
2. Taking account of the population projections outlined in the Housing Growth Strategy how does the Council envisage the population for Belfast will grow? Is there an understanding that the population growth is heavily reliant on inward migration for jobs?
3. How does the Council intend to intervene in the trend of increased migration to Belfast and a reduction in the historic trend of outward migration from the city to other areas?
4. Referring to paragraph 6.28 of the Housing Growth Options report what interventions does the Council foresee that could result in more significant changes to the labour force behaviour to deliver the forecast levels of job growth through lower population and household growth in the city?
5. The Executive Summary of the RDS states that in relation to the Metropolitan area, the evidence is that over 50% of those who work in Belfast live outside of Belfast. What evidence has been presented of how the proposed growth has taken this into account?

Housing Growth (RD)

6. In accordance with the Housing Growth Options report which predicts build rates of between 1,600 -1800 dwelling per annum over the plan period. Based on these build rates and in summary can the Council explain the evidence base as to how the exact figure of 31, 600 additional homes for Belfast was arrived at within the dPS?

7. The Housing Growth Options report recommends that a further detailed review of the market reality of achieving a notable uplift in the supply of housing should be undertaken to build on the this evaluation. Has any further review been undertaken to inform the growth strategy?
8. Paragraph 4.1.5 of the Council's letter to the PAC dated 31 July 2020 ([ED002.B](#)) refers to a report which looks at the HGI methodology, prepared by Turley and completed in January 2020. Can the Council explain the findings of the report and can a copy be provided?
9. To what extent has the growth strategy taken account of the cumulative impacts of housing growth in Belfast on the neighbouring Councils within the Belfast Metropolitan Urban Area?

Phasing Growth (RD)

10. Paragraph 5.1.4 of Policy SP1 states that the '*delivery of employment space and homes will be phased to align with infrastructure capacity and investment over the plan period*'. Would the Council like to explain what this means/or how this is will be anticipated over the lifespan of the plan? What evidence base is used to determine the phasing approach suggested in the dPS?
11. Why does the Council consider phasing approach to be necessary? Does such phasing have implications for the flexibility and delivery of the quantum of growth proposed in the plan?
12. Could reliance on phasing reduce the ability of the market to respond quickly to development opportunities and change?
13. The Council have stated that they have provided robust evidence within the Housing Growth Options Report and Technical Supplement 2 Housing. The proposed level of housing is in accordance with build rates recorded through the housing monitor. Can the Council explain the basis for the prediction for the build rates going forward over the plan period, do these rates relate to the peak of the housing market?
14. Without getting into the remit of Policy HOU1 at this stage, 'Technical Supplement 2 Housing' sets out the projected build rates necessary to achieve the delivery of the projected annual housing rates. How does the Council envisage the dPS supports the delivery rates? Is there a risk that such ambitious indicated levels of house building will not be achieved especially when wider issues such as Brexit and the Covid Pandemic are taken into account?

Transportation Growth (RD)

15. Without going into the specific details relating to transportation in the dPS at this stage, how does the Council envisage the plans growth strategy will be supported by the transport network now and over the life span of the plan?

Retail Growth (RD)

16. How has the Council worked collaboratively with neighbouring councils and relevant stakeholders to ensure that Belfast City Centre and associated retail strategy supports accessible, vibrant town centres within its Council areas beyond Belfast City?
17. The RDS recognises Sprucefield under SFG1 as a '**regional out of town shopping centre**'. What consideration has the growth strategy given to the balance of commercial growth as required by the RDS? Has consideration been given to the 'potential to grow the retail offer' in Lisburn City Centre?
18. Does the Council have an up to date position on the City Deal approval. To what extent does the Council consider the City Deal approval will bolster growth in the City?
19. The Council have stated that Colliers International report acknowledges that 'public sector intervention in the form of a market stimulus' may be required in the short term to support market adjustments to the new policy environment. What type of intervention does the Council envisage to stimulate market adjustments?

Water & sewerage infrastructure (JdeC)

20. On foot of its earlier submission on the Council's Preferred Options Paper, Northern Ireland Water's representation in respect of the dPS was critical of omissions of its evidence from Technical Supplement 15 Public Utilities (TS 15) and the use of allegedly out of date evidence therein. On this basis, it considered that the "*significant challenges presented by Ni Water and the Living with Water Programme in terms of wastewater capacity in Belfast*" had not been fully been taken account of. The Council responded to this repeated concern in its "*Draft Plan Strategy – Public consultation report August 2019*" ([Link](#)) (pages 331 & 332). Given that TS15 was published over two years ago in August 2018 and the Council's aforementioned report a year later, where do these parties now (stand on NI Water's expressed concerns about wastewater capacity to support the level of growth that Policy SP1 aspires to?
21. At paragraph 3.26 of TS 15, the Council referred to the capacity of existing Waste Water Treatment Works. Can the Council and any of the statutory undertakers provide an update of this information?
22. In its representation under the heading "Belfast Capacity Constraints" NI Water:
 - a. Provided a bulleted list of planned investment to maintain compliance with the treated effluent discharge standard and, if possible, continue to facilitate new connections without an interruption gap. As this evidence is over 2 years old, can NI Water and/or DfI WDPD provide an update of this information?
 - b. Commented on the implications of non-compliance at Waste Water Treatment Works (WWTW) for development seeking new connections thereto. What is the current situation with regard to this potential constraint on growth? and

- c. Referred to emergent wastewater network capacity issues due to sewer network modelling and the implications for new connections in parts of the catchment. What is the current situation with regard to this potential constraint on growth?
23. NI Water & DfI Water & Drainage Policy Division (WDPD) expressed concern that there is uncertainty associated with the Living With Water Programme (LWWP) and its implementation; and lack of clarity in respect of effective mitigating actions should the Belfast wastewater system reach capacity. As those comments were made more than 2 years ago, how is it currently envisaged that the LWWP will address concerns about infrastructural capacity in respect of wastewater capacity:
 - a. Within the Plan area; and
 - b. The potential cumulative impact of the scale of growth proposed in addition to that already committed in respect of the wider Belfast metropolitan area?
24. The criticism was made that whilst Policy ITU2 seeks to support statutory authorities in developing water and sewerage infrastructure that the dPS makes little attempt to identify in more detail the strategic infrastructure required to support its growth strategy. In terms of sewerage infrastructure is the growth strategy realistic and appropriate and founded on a robust evidence base?
25. Has account been taken of RDS RG12, specifically the first bullet point of paragraph 3.32?
26. On-going engagement with NI Water in considering the growth strategy's implications for water and sewerage infrastructure was raised with the Council in our letter of 3 July 2020 {Examination documents [ED001.A](#) & [ED001.B](#)} Our associated concerns were addressed at section 7.6 of its response of 31 July 2020 (Examination document [ED002.B](#)). These can be found at examination document webpage www.pacni.gov.uk/node/120/. Is there anything that participants want to add in respect of this issue?
27. The matter of the amount and strategic location of land for economic growth is dealt with elsewhere on this agenda and will be considered in due course. In our aforementioned letter of 3 July 2020 to the Council, we raised the issue of waste water treatment capacity to accommodate the scale of economic growth aspired to. The Council responded in section 3.2 of its letter of 31 July 2020. Is there anything that participants want to add in this respect?
28. In that aforementioned letter, we also raised further associated issues about water & sewerage infrastructure constraints. The Council reproduced these and addressed them at section 7.2 of its letter of 31 July 2020. Is there anything that participants want to add in this respect?
29. In that same letter, further issues were raised with regard to possible associated infrastructural constraints on delivery of the growth strategy. These are reproduced and

addressed at Sections 7.4 and 7.5 of the Council's letter. Is there anything that participants want to add in this respect?

30. Representation was made that it is unreasonable to assume that developer contributions can be used to address large infrastructure upgrades such as those needed to underpin the Council's growth strategy. In respect of the wastewater network, is the Council's growth strategy realistic and appropriate?

Any other issue

Belfast Local Development Plan
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Wednesday 20th January 2021

Topic 12: Strategic Policies - Contd

Sustainable Development

1. To be coherent with regional policies contained in the RDS and the SPPS should SP2 Sustainable Development come before and inform the SP1 Growth Strategy policy in the plan document?
2. For the plan to be sound should the wording of Policy SP2 be amended to replicate the precise wording of paragraph 5.72 of the SPPS in order to be more compliant with regional policy?
3. In order for the plan to be sound should the wording of paragraph 3.9 of the SPPS replicate the precautionary approach within the context of Policy SP1?
4. For the plan to be sound should policy SP2 and its associated justification and amplification specifically support/promote the redevelopment of brownfield land for the development of sites in the plan area?
5. Paragraph 5.2.2 states it is important to secure the orderly and consistent development of land to deliver the council's social and economic priorities. To what extent does the plan seek to deliver this and what evidence can the council sign post me to demonstrate this?
6. Should paragraph 5.2.2 specifically acknowledge the role the historic environment plays in the sustainable development of the City?

Improving Health & Wellbeing

7. In its *"Draft Plan Strategy – Public consultation report August 2019"* ([Link](#)), the Council says (pages 58 & 59) that Policy SP3 is an overarching strategic policy that will help deliver the key aims of the LDP. It refers to Policies HC1 and CG1 in particular as providing operational policy in the delivery of healthy communities and community infrastructure. However, looking at Appendix F: Monitoring Indicators there are no targets or triggers set in respect of these associated operational policies. In this context, are there clear mechanisms for the implementation and monitoring of this strategic policy?

Community Cohesion and Good Relations

8.
 - a. The policy makes no mention of promoting community cohesion and fostering good relations in areas where there are on-going tensions between residential owner-occupiers and the landlords and tenants of Houses in Multiple Occupation (HMOs). What consideration did the Council give to such representations and where is this in its evidence base?
 - b. Are Policies HOU10, HOU11 and HOU12, individually or cumulatively, adequate to address the issues identified in paragraph 7.1.62 in areas of the city where associated problems already persist?
 - c. Does provision for areas with an existing high proportion of HMOs need to be made in Policy CGR1 in order for the Plan to be coherent and effective in this respect?
9. The Council has provided a definition of “*shared space*” in its “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) at page 61 where it is defined as: “*Space that is welcoming, accessible, good quality and safe*”. In order to provide clear mechanisms for implementation and monitoring of Policy SP4 and other associated, more detailed operational policies (CRG1 & CRG 2), would it be prudent to include the definition either within the Justification & amplification text for Policy SP4 or the Glossary?
10. Appendix F: Monitoring Indicators makes no provision for Policy SP4 or associated policies CGR1 & CGR2. How will this strategic policy be implemented and monitored?

Positive Place Making (RD)

11. Paragraph 5.5.2 of Policy SP5 recognises that there are areas of the city that are fractured, disjointed and contain poor quality environments, which in terms of place making create a number of opportunities for the city to embrace and improve upon. To what extent does the dPS indicate that this will be implemented within the plan document?
12. Representors have stated that the last study on dereliction in Belfast was carried out by Building Control in 2013. Has there been any up to date assessment of dereliction to inform the dPS? To what extent or what consideration has the dPS given to the redevelopment of vacant/derelict/dilapidated buildings or structures in Belfast and how such issues will be addressed going forward over the life span of the plan?

Environmental Resilience (JdeC)

13. Given the strategic nature of Policy SP6 of the dPS, it appears that Policies ENV1 – 5 inclusive provide the associated operational policy. With regard to implementation and monitoring, indicators 25 and 29 of Appendix F: Monitoring Indicators relate to Policies ENV4 and ENV5 respectively and a specific question was included on the November agenda regarding such arrangements in respect of Policy ENV1 (Topic 10, question 1). In respect of Policies ENV2 and ENV3, what clear mechanisms are contained within the dPS for implementation and monitoring?

Connectivity (RD)

14. (a) Policy SP7 and its justification and amplification recognise the significant number of commuters using private vehicles which causes congestion and leading to increasing air pollution. What consideration or provisions does the plan make to support the move to the use of cleaner technologies that could make significant changes to the impacts of congestion such as air quality?

(b) Should the dPS encourage policies to make commuting by private vehicle easier and more efficient in order to reduce journey time and air pollution?
15. Technical Supplement 17 sets out the vision and objectives for transportation in Belfast. The technical supplement refers to a Car Parking Strategy and Action Plan published in May 2018. What is the current status of this document and how does the dPS take account of this strategy? Can a copy of this document be provided?
16. Whilst the word 'densification' is not specifically used but the Council have stated that paragraph 5.7.3 clearly promotes densification of use in accessible locations. Is specific reference to the word 'densification' in the context of SP7 necessary to make the plan sound?
17. The Council consider reference to access to and from the airport will be considered in more detail at the local plan policies stage. However given Policy SP7 sets the strategy for connectivity in the plan area should this policy specifically reference to the connectivity with the airport? Should figure 5.4 identify the George Best City Airport on this map? Does the omission of reference to the airport mean the plan is unsound?

Green and Blue Infrastructure (JdeC)

18. The relationship of the Council's Green and Blue Infrastructure Plan (GBIP) with the policy provisions of the dPS for open space was discussed in the November session of the IE (Topic 2, question 3). That issue is not being re-opened for further debate and there is no need for this evidence to be repeated. In light of this and the Council's response to a representation in the "*Draft Plan Strategy – Public consultation report August 2019*" at pages 72 and 73 ([Link](#)) saying that its aspirations for green and blue infrastructure should be integral to the Plan Strategy, does the dPS have regard to the GBIP or would it be a more coherent approach to replicate its vision and strategic principles within the dPS?
19. (a) Amongst other things, The Belfast Agenda includes: Outcome 2 – Belfast is a welcoming, safe, fair and inclusive city for all; and Inclusive growth – stretch goal of "making life better for all our residents" with 8 associated workstreams. In this context, what account has the Council taken of its Community Plan where, in response to a representation that open spaces should incorporate the needs of those with sensory and developmental disabilities, it refers to such concerns as a detailed design matter that would be considered during the development management process?.

(b) Where within the dPS does the Council consider that such considerations are covered by other draft policies?

Any other issue

Belfast Local Development Plan
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Monday 25th January 2021

Topic 13: Spatial Development Strategy (RD)

Settlement Hierarchy

1. Figure 6.1 Settlement Hierarchy is a diagram to illustrate the four settlements in Belfast. Is the intention of this diagram for illustrative purposes or would this map be better represented with clear lines and boundaries to clearly decipher the settlement boundaries?
2. To what extent has the Council engaged with the surrounding Council's in the formulation of the Belfast Settlement Hierarchy?

Settlement Areas

1. Policy SD1 of the dPS designates 8 settlements areas. Is it logical that the specific details of those settlements will come forward through the local plan policies and therefore such detail is not necessary or available at this stage?
2. The Belfast Harbour Area is one of the 8 designated areas. Paragraph 6.2.11 of the justification and amplification describes the uses in this area and includes office accommodation, apartments, retail and education. Does a lack of a statement relating to the density of development in this area make this policy unsound?
3. Should Figure 6.2 include the identification of the airport similar to the identification of the rail stations? Does the lack of identification mean the dPS is unsound?
4. Whilst not specifically related to Policy SD2 the Council have recommended a minor change to the text at paragraph 5.0.3 to include "***Belfast's harbour area, via port and Belfast City Airport provides a gateway to Britain, Europe and the rest of the world. They will continue to as an enabler of wider economic growth throughout the plan period***" What are the views on this suggested minor change?
5. Should the final bullet point of paragraph 6.2.1, the justification and amplification, of Policy SD2 Settlement Area be amended to refer to the 'port and the airport'? Does the lack of reference to the airport mean the dPS is unsound?
6. Should paragraph 6.2.12, the justification and amplification, of Policy SD2 Settlement Areas be amended to refer to the use of the airport by businesses and also reference to made to the safe guarding zone? Does the lack of reference mean the dPS is unsound?

7. Figure 6.2 of Policy SD1 indicates the broad location of the District Centres in the wider settlement of Belfast. It is noted that Technical Supplement 4 lists the identified District Centres and that some of these centres make a better contribution to the area than others. To what extent has the Council evaluated or carried out a review of the role and function of these District Centre in order to promote their vitality and viability?
8. What weight does the Council give to the Belfast City Regeneration Plan and Investment Strategy within the context of the dPS?

City Centre

9. What does the dPS envisage is the vision form the City Centre? What supporting evidence best informs the vision for the City Centre?
10. Does the dPS create restrictions or limit perceptions of the purpose and character of the City Districts by defining them as separate areas? How does the Council envisage that defining the Districts in the City Centre will stimulate investment to the growth and knowledge of the economy to strengthen the City Centre's position?
11. The dPS indicates that Titanic Quarter is not within the City Centre. In the context of 'how we will grow Belfast' can the Council explain:
 - a. The rationale for the exclusion of Titanic Quarter from the City Centre;
 - b. What alternatives were considered when identifying the City Centre; and
 - c. How does the exclusion of the Titanic Quarter from the City Centre sit within the context of the RDS and other relevant plans, policies and strategies relevant to this area?
12. Looking at Figure 6.3 how does the Council envisage the green and blue infrastructure alignments in this diagram will fit within the City Centre? Is this something that will be consider in detail with the Local Policies Plan?
13. Paragraph 1.6 of Technical Supplement 4 recognises the impacts of the rise in online retailing, which has marked the high street as consumers habits and shopping patterns change prompting the rise of retail vacancy and growth of retail services such as food and beverage outlets. What impacts does the Council consider that the Covid Pandemic will have on the future of Belfast City Centre (City Core, Innovation District, Mercantile District and the Waterfront District) in terms of consumer habits and shopping patterns on retail and office spaces or any other aspects of the vibrancy of the City Centre?

Any other issue

**Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Tuesday 26th January 2021**

Topic 14: Shaping a Liveable Place - Housing (RD)

Accommodating new homes

1. Policy HOU1 sets out indicative annual rates. How will the plan deliver ensure these rates are delivered? Does such specified rates reduce flexibility in the delivery of housing delivery for Belfast?
2. To what extent have the housing allocation taken into account impacts on the wider Belfast Metropolitan Area inclusive of neighbouring Councils?
3. Whilst we have already discussed phasing in the context of Policy SP1, however in the context of Policy HOU1 how does the dPS envisage the 'plan, monitor and manage approach' will be implemented? How will market demands be factored into the phasing and delivery of housing in Belfast?
4. How does the Council foresee or in what form will the ongoing monitoring of housing supply and land availability take to ensure that a 5 year supply of land will be maintained throughout the plan period?
5. Without repeating what has been covered in respect of policy SP1 what is the evidence basis were the figures presented in table 7.2 formulated? Is there a risk that the levels of house building will not be achieved in the plan period?
6. Policy HOU1 provides for 8000 new homes in Belfast City Centre. How does the dPS envisage that there will be a mix of homes, including family accommodation delivered within this 8000 allocation for Belfast City Centre?
7. The plan makes a zero provision for the settlement of Hannahstown, what is the rationale for this proposal in the dPS? How does this proposal allow for flexibility in dealing with changing circumstances through the plan period? Is it appropriate if there is an identified need for social housing that it is left to be provided by means of the windfall allowance?
8. What account has the plan taken of the NIHE housing need figures which indicates a need for 417 new dwellings in the Outer West area of Belfast and 2136 for West Belfast as whole to meet the prevailing social housing demand?
9. The plan provides for 18,100 new homes in the rest of Belfast. To be coherent should the dPS be less generalised in manner to ensure that development is directed to areas of greatest need?

10. The Council have stated that they are currently completing a Belfast Infrastructure Study. Without repeating what has already been stated in the strategic topics, what are the findings or outcomes of this study specifically in relation to the delivery of housing in Belfast?
11. To be consistent with regional policy contained in the RDS and SPPS should the headnote of Policy HOU1 make specific reference to the management of housing growth to achieve sustainable patterns of development?

Windfall Housing

12. Figure 7.2 of Policy HOU1 states a specified windfall housing supply of 2000 units on windfall sites. Is this a modest figure for windfall housing supply especially in the context of the SPPS acknowledgement that windfall housing can be a key source of housing supply?
13. How will Policy HOU2 contribute to the management of the stated supply for windfall housing supply especially in the context that historically the vast majority of housing units were delivered on unzoned land?
14. Will there be a cap or moratorium on windfall sites when 2000 housing units over the plan period is reached? Does this allow for flexibility in the dPS?
15. Criterion (a) of Policy HOU2 refers to the word suitable. What is meant by the word 'suitable'? Where is this clearly explained in the justification and amplification?
16. What account does Policy HOU2 give to the conservation value to for the redevelopment of Brown Field sites?
17. Should the wording of Policy HOU2 take cognisance of the fact that new housing development is likely to be delivered outside of the urban footprint and outside the existing settlement development limit?

Protection of existing residential accommodation

18. Policy HOU3 has a presumption in favour of the retention of residential stock for permanent occupation. What consideration does the policy allow for the consideration of the quality or standard of existing residential stock?
19. How does Policy HOU3 prevent the loss of existing residential stock through means of demolition? Would the policy as worded would it encourage developer to demolish the existing residential stock before proposals are made to the Council?

Density of Residential Development

20. Policy HOU4 provides a table of density bands. The last paragraph of the policy headnote advises that the density band are to be used as a guide to inform proposed developments. If these density bands are a guide is it appropriate that they should be explicitly stated in the headnote of policy?

21. On what basis have the density bands been devised for each settlement or character area? Can the Council indicate the evidence basis within the suite of documentation? What account has been given to existing density ranges already established through planning applications i.e such as those at Titanic Quarter? Is it appropriate to leave the detail of such to the KSR for a specific site?
22. How does the position set out for Tall Buildings in the density table sit with the provisions of Policy DES3 which does not make any statements regarding a locational basis for tall buildings? At what stage is the SPG at that is said will deal with this issue?
23. Density bands have been set for City Corridors and Figure 7.3 on page 67 of the plan illustrates vaguely the locational basis of such city corridors. How will such areas be defined? Will there be flexibility in such areas in the context of established densities?

Any other issue

Belfast Local Development Plan
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Wednesday 27th January 2021

Topic 14: Shaping a Liveable Place - Housing (RD) - Contd

Affordable housing

1. Policy HOU5 relates to all residential development sites greater than 0.1 ha and/or containing 5 or more dwelling units where a minimum of 20% of units are provided as affordable housing. What is the rationale/evidence basis for the stated threshold/triggers in respect of Policy HOU5?
2. What reasonable or suitable alternatives were considered in respect of achieving affordable housing with in the dPS?
3. Is the proposed threshold in line with the approach set out in the SPPS?
4. Representors have referred to the DSD Three Dragon Report prepared in 2015. Can the Council advise the nature of this report and if relevant can a copy of this report be provided? Was this considered as part of the evidence base for this affordable housing policy?
5. Should policy HOU5 be applied to development site's where there is no identified affordable housing need?
6. In order to take account of land values and the delivery of housing should the policy differentiate between and be more flexible in respect of site types: such as brownfield; greenfield; inner city and edge of city sites?
7. At page 124 of the Councils 'response to key issues raised' the Council have stated that 'at Local Policies Plan stage, the Council consider it appropriate and necessary to reserve the right to adjust the affordable requirement upwards where this is deemed viable through the use of KSR on larger strategic sites. Can the Council clarify where this is stated in the dPS? Does this represent a coherent strategy from which local plan policies will flow?
8. To ensure the delivery of affordable housing will it be necessary to impose a section 76 agreement on every site or will this be on a case per case basis? Do such measures further add to flexibility and delivery of housing sites?
9. Paragraph 7.1.37 recognises that there may be occasions where a particular housing site in Belfast might be able to meet the affordable housing demands in full, so flexibility has

been built into policy. Can the Council explain the nature of the flexibility that it considers is built into Policy HOU5?

10. Paragraph 7.1.37 allows for exceptional circumstances, a reduction in the proportion of affordable housing in lieu of a financial contribution to an affordable housing development elsewhere in the district. How will this process be managed to ensure the delivery of affordable housing?
11. At page 141 of the 'Council response to key issues raised' the Council have stated that they are working in partnership with DfC and NIHE and other relevant stakeholders to ensure delivery mechanisms are adapted to reflect the emerging policy approach. Would the Council like to advise on the nature of such delivery mechanisms that are being considered and have any options emerged from these discussions to identify clear mechanisms for the implementation of provisions of Policy HOU5 for affordable homes?
12. What implications does the most up to date version of the Developer Contribution Framework have for the delivery mechanisms for affordable housing?
13. In the context of appendix 7 how does the Council envisage the implementation of monitoring of the affordable housing over the plan period? Will such measures take account of market changes in terms of housing need?

Any other issues

Belfast Local Development Plan
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EXAMINATION AGENDA
Monday 1st February 2021

Topic 14: Shaping a Liveable Place - Housing (RD) - Contd

Housing Mix

1. Policy HOU6 relates to all new residential development sites greater than 0.1 ha and/or containing 5 or more dwelling units where a minimum of 20% of units are provided as affordable housing. What is the rationale/evidence basis for the stated threshold/triggers in respect of Policy HOU6?
2. Paragraph 7.1.44 refers to independent research commissioned by the Council, what format did this research take to produce the figures presented in the justification and amplification of Policy HOU6? What allowance has been made for family housing in the plan area?
3. What is the rationale for the last sentence of Policy HOU6 which states “as well as the appropriate mix of tenures required under affordable housing policy”?
4. In order for the plan to be coherent should Policy HOU6 apply only to affordable housing? Would this requirement be best placed as an integral part of Policy HOU5?
5. What consideration does this policy give to the viability, flexibility and delivery of housing units in the plan, including in apartments and mix use development?
6. Should policy HOU6 be applied to development site’s where there is no prevailing housing need in that area?
7. The Council’s evidence base is linked to the most up to date Housing Market Analysis Update prepared in 2017, has there been any update to that analysis?
8. What issues are proposed to be addressed within the proposed SPG for Housing Mix?

Adaptable and Accessible accommodation

9. Policy HOU6 requires that all new homes are designed in a flexible way to ensure housing is adaptable throughout all stages of life. The policy is prescriptive and sets out numerous criteria. What is the rationale/evidence basis for the specific design requirements stated by the criteria (a) to (f)?

10. Paragraph 7.1.51 stats that DfC guidance issues to housing associations stipulates that 7% of all new social housing should be built to wheelchair standard. What is the rationale/evidence for:
- a. the triggers and thresholds of 10 units or more and 10% of units are wheelchair accessible for all new housing as set out in Policy HOU7 for wheelchair accessible units; and
 - b. the stated criteria (g) to (o) of Policy HOU7?
11. Is such detail in the design of new homes realistic and appropriate when trying to achieve affordability as well as the delivery of new homes in the plan area?
12. Why is it necessary for the dPS to duplicate building regulations requirements?
13. Is this policy coherent with other aspects of the housing strategy such as the suggested density band and housing mix?

Specialist Residential Accommodation

14. Criterion (a) of Policy HOU8 requires a statement of special need. What should such a statement contain and what is the rationale or evidence basis for such a requirement?
15. At what stage is the proposed SPG for specialist residential accommodation and what issues will it address?

Housing Management Areas

16. What provisions does Policy HOU10 provide for the management of properties within a HMA? How does this policy promote balanced communities?
17. What considerations does Policy HOU10 provide in respect of the suitability of a property as a HMO in the context of shaping quality and sustainable residential development?
18. The Council have indicated (page 186 of the Council's response to key issues raised) that a new HMO licensing scheme has been introduced to replace the NIHE registration scheme. Hence the responsibility for future licensing will be with the Council. Is this currently operational and how will/is it implemented?

Large scale purpose built managed student accommodation (PBMSA)

19. Policy HOU12 relates to large scale purpose built managed student accommodation. The policy has five separate criteria. Criterion (b) relates to development which consists of a

minimum of 200 occupants. The Council has explained this has followed through from the existing HMOs Subject Plan. Does the Council have any further comments on this?

20. How does the dPS seek to address other forms and scales of student accommodation in Belfast? What provisions does this policy for smaller PBMSA ie those with less than 200 occupants? Is leaving such development to be considered on their own merits a coherent approach to managed student accommodation?
21. Should the wording 'large scale' be removed from the policy heading to ensure this policy is coherent?
22. With the Council's acknowledgement that PBMSA does not contribute to the general housing stock should the headnote of Policy HOU12 explicitly state that the requirements of Policy HOU5 Affordable housing does not apply to this policy
23. Paragraph 7.1.81 refers the utilisation of bed space outside of term time. In order for the policy to be sound should the limitations expressed at this paragraph form an additional criterion in the policy headnote?

Any other issues

Belfast Local Development Plan
Draft Plan Strategy 2035
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Tuesday 2nd February 2021

Topic 15: Shaping a Liveable Place – Urban Design (RD)

Principles of Urban Design

1. Paragraph 7.2.9 of the justification and amplification of Policy DES1 relates to local distinctiveness, should this paragraph encapsulate proposals that perhaps have a wider significance to the City as whole, rather than just its local area? Whilst the local policies plan will look further at character area studies and locational policies will follow should matters relating to the wider City not sit within the dPS document?
2. The Council have made a suggested minor change to paragraph 7.2.9 to include the wording “***including conservation areas and areas of built heritage***” at the end of this paragraph. Is there anything the Council would like to add to this suggested change?
3. Paragraph 7.2.14 of the justification and amplification of Policy DES1 promotes the sustainable transport hierarchy. Should this paragraph consider transport within and connections to areas outside the City? Is this policy unsound because it does not specifically mention these requirements in respect of transport?
4. Paragraph 7.2.16 of the justification and amplification of Policy DES1 states the Council will support proposals that incorporate Building Research Establishment Environmental Assessment Method (*BREEAM*) or comparable standards. Where is the evidence base for such provision?
5. To what extent does Policy DES1 encourage or promote biodiversity into the principles of design?
6. Should the policy have a clause to remind the reader that ‘planning permission will be subject to meeting all other policy requirements’ to make it more consistent with Paragraph 3.9 of the SPPS?

Master planning approach for major development

7. Policy DES2 states that planning permission will be granted for ‘major development’ where it accords with the outline master planning principles. The Council have helpfully provided clarification on what is meant by ‘major development’ and have made a suggested change to paragraph 7.2.21 of the justification and amplification to state “***.....(major development is defined as those ‘major development applications’ defined***

by Section 26(1) of the Planning Act (Northern Ireland) 2011)". Does the Council wish to add anything to this suggested clarification?

8. The Council have made a suggested minor change to criteria (j) of Policy DES2 to add the wording "**Seek the retention of....**" to the beginning of this sentence. Is there anything the Council would like to add to this suggested change?
9. In respect of Policy DES2 should is an additional bullet point referring to avoiding prejudice to the local and strategic traffic/road network to reduce congestion and promote safety necessary to make this policy sound?
10. Is the Council satisfied that the policy requirements of DES2 are coherent and consistent with the requirements of Policy CC1 Development Opportunity Sites?

Tall Buildings

11. Can the Council explain the rationale for the definition of a tall building being one which is over 35 metres AOD for the application of this policy? In what format does the Council consider that further tall building locational assessments may be carried forward?
12. How does provisions of Policy DES3 sit with the density ranges of Policy HOU4. Are they coherent?
13. Policy DES3 sets out criteria (a-h) is it necessary that each and every criteria is met to gain planning permission? Is this flexible in the context of the plan?
14. (a) How does the requirements of criterion (c) sit with other Built Heritage policies in the plan? Are they coherent?

(b) Historic Buildings have recommended some amendment to criterion (b) adding the word setting and removal of the word designated to make the policy consistent with Regional Policy and the SPPS. The Council have included these amendments in their schedule of minor modifications (page 454). Does the Council wish to add anything to this change?

(c) Historic Buildings consider the second sentence in the justification and amplification of Policy DES3 conflict with the last paragraph of the policy text. What is the Council's position on this?
15. Technical supplement 6 Urban Design & Built Heritage identifies broad clusters for the location of tall buildings. Accordingly criteria (d) encourages the contribution to a cluster or an interesting skyline when grouped together. The wording of the dPS makes no reference to any locational based assessment of the clusters?
16. Is the final paragraph of the policy head note for Policy DES3 coherent with criterion (d) of the policy when the existing tall buildings are already present in the city context and on the skyline? Does this wording of policy suggest that when considering tall buildings the existing character and context of the area would have to be set aside?

17. Should Policy DES3 be crossed reference to the requirements of Policy DES2 relating to masterplans for the City?
18. What account does Policy DES3 give to the architectural design, quality, massing or true contextual considerations for tall buildings in the city?
19. Should the dPS set (a) out clear strategic restrictions for tall buildings in Conservation Areas; and (b) clear guidance on how taller buildings when sited beside existing buildings of architectural or historical merit?
20. Paragraph 7.2.31 states what a tall building design statement should include. Would such details not already be provided for within a Design and Access Statement, Concept masterplan, townscape and landscape visual assessment and other technical assessments?
21. The Council have added a minor change to paragraph 7.2.31 stating that “**further locational based policies will be assessed at the local plan policies stage**”. Does the Council have anything further to add?
22. At what stage is the proposed supplementary guidance for Urban Design? What remit does it intend to address?

Advertising & Signage

23. Does the Council consider Policy DES4 as worded takes account of the hierarchy tiers between listed buildings, conservation areas and areas of townscape as clearly expressed by the SPPS?
24. Should Policy DES4 specifically state that advertisement equipment proposed for footways must be positioned to minimize obstruction to pedestrian movement, having regard for people with visual and mobility impairments? Does the failure to include such 2requirements make this policy unsound?
25. To take account of regional policy expressed in the RDS and paragraphs 10 and 11 of Annex A to PPS17 should criterion (a) of policy DES4 be amended to state ‘*Are of good design, are located sensitively within the streetscape and gateway locations and do not have a negative impact on amenity*’? Would amending the wording of policy be a coherent approach to policy wording rather than leaving to as matter for the proposed SPG?

Any other issues

Belfast Local Development Plan
Draft Plan Strategy 2035
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Wednesday 3rd February 2021

Topic 16: Shaping a Liveable Place – Residential Design) (RD)

New Residential Development

1. The introduction to Policy RD1 states ‘planning permission will be granted for development’ should the word normally be introduced to allow flexibility in the policy?
2. (a) Policy RD1 sets out criteria for new residential developments. Criterion (c) requires that provision is made for, or is accessible and convenient to public transport and walking and cycling infrastructure. How will ‘accessible and convenient’ be assessed?

(b) Would a suggested distance from public transport facilities (800 metres or 10 min walk) make this requirement more realistic and deliverable? Does a lack of this requirement mean the policy is unsound?
3. What is the intention of criterion (g) of Policy RD1? Will this prevent residential development to the rear of a property? It is this criterion clear to the reader?
4. Should criterion (m) of Policy RD1 be applied to all new residential developments and not just apartment developments over 30 units? Or is there sufficient guidance for such developments in Creating Places?
5. Problems with Management Companies are apparent. Whilst their legal structure is outside the remit of the LDP process how does the Council foresee the role of such Management Companies going forward with the implementation of quality in new residential developments?
6. How does the Council envisage a SPG to address the issues relating to Management Companies? Will this be covered by new SPG proposed for Residential Design?
7. The Council have considered the representation in respect of the exclusion of HMO areas (e.g Stranmillis) and have suggested a minor modification to Appendix B which sets out the definition of an Established Residential Area. The suggested minor modification should read “***An established residential area is normally taken to mean residential neighbourhoods dominated by a recognisable for of housing styles with associated.....***” How does the Council consider this minor modification satisfied the raised concern?
8. Whilst not a specific issue that I have questions on I note the Council have also made a suggested minor modification to paragraph 7.3.29. The rewording reads “**Conversions of**

floor space above commercial premises for residential use can make a small.....” Does the Council wish to comment on this minor modification?

Any other issues

Belfast Local Development Plan
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Monday 8th February 2021

Topic 17: Shaping a Liveable Place – Built Heritage (JdeC)

All parties listed under Policies BH1 – BH6 inclusive are eligible to take part in discussion of questions 1 - 9 inclusive. Question 10 is for Belfast City Council only.

1. Would reference to “*heritage assets*” throughout Section 7.4 of the dPS rather than “*built heritage assets*” maintain consistency between its various provisions and also with the SPPS, in particular paragraphs 2.2, 3.3 (third bullet point) and 6.24?
2. Should section 7.4 of the dPS be re-titled “*Archaeology & Built Heritage*” in order to be consistent with the relevant provisions of the SPPS and Planning Policy Statement 6: “*Planning, Archaeology and Built Heritage*” (PPS 6)?
3. In respect of all 6 proposed Built Heritage policies does “*take account of*” the RDS and consistency tests C1 and C3 of DPPN 6, mean that:
 - a. The dPS should replicate the wording and/or volume of existing policy; or
 - b. As the Council contends, that it should align to their core principles and aims whilst being fit for purpose in protecting heritage assets?
4. In accordance with Transitional Arrangements set out on the SPPS, PPS 6 will cease to have effect when a Council adopts its Plan Strategy. In reducing the number of policies relating to archaeology and built heritage by comparison to PPS 6, allegedly removing general criteria and arguably weakening existing policy by “*streamlining*” it, are the dPS’s built heritage policies consistent with the provisions of PPS 6?
5. Section 7.4.3 of the dPS, first bullet point – In omitting reference to “*conserve*” did the Council take account of RDS RG11 and paragraph 3.30 (bullet points 1 & 2) and paragraphs 6.4 (bullet point 1) and 6.29 of the SPPS?
6. In respect of Policies BH1 – BH5 inclusive is their wording too permissive when account is taken of the language of the PPS 6 policies? Should the wording of these dPS policies be amended to read that: “*The council will normally only grant proposals for XXXX where all the following criteria are met:*”?
7. By not replicating legislative provisions relating to built heritage and archaeology, are the policies failing any of the tests for soundness that are set out in DPPN 6?

8.
 - a. Is inclusion of the word “designated” at various junctures throughout the built heritage section, including paragraph 7.4.4 and Policy BH4, consistent with RG11 of the RDS and the provisions of the SPPS in respect of archaeology and built heritage; specifically, in respect of paragraph 6.24 and archaeological sites or monuments of local importance?
 - b. Is inclusion of the word “designated” at paragraph 7.4.4 consistent with criterion b of Policy BH5?
9. Criterion e of Policies BH1, BH2 & BH3 all refer to regard being given to relevant supplementary planning guidance (SPG). Albeit that the penultimate bullet point of paragraph 6.19 of the SPPS refers specifically to Conservation Area (CA) design guides, should the wording of those criteria be amended by replacing “*regard is given*” by “*Conform*” in order to achieve: consistency with the SPPS as regards CAs; consistency between the policies in respect of the role of SPG; and provision of a clear mechanism for implementation in this respect?

Belfast City Council only

10. In accordance with Transitional Arrangements set out on the SPPS, Planning Policy Statement 23: “*Enabling Development*” will cease to have effect when a Council adopts its Plan Strategy. Policy ED 1- Enabling Development thereof sets out detailed provisions for assessing proposals involving enabling development relating to the re-use, restoration or refurbishment of significant places. The SPPS provisions relating to enabling development provide little by way of operational policy for development management purposes. Did the Council take account of the provisions of paragraph 6.27 thereof?

Listed Buildings

11. In respect of criterion g of Policy BH1, did the Council take account of the provisions of criterion (b) of Policy BH 8 of PPS 6? If so, what was the rationale for departing from the wording of adopted policy?
12.
 - a. With regard to the change of use of a LB element of Policy BH1, did the Council take account of RG11 and paragraph 3.30 (1st two bullet points) of the RDS and paragraph 6.4 (1st bullet point) in respect of the conservation of built heritage?
 - b. To ensure consistency with the RDS and SPPS in these respects, is amendment of the first sentence required in order to include “...*historic interest of the building would be protected, conserved and, where possible, enhanced*”.
 - c. With regard to criterion f of Policy BH1, in order to ensure consistency with the RDS and SPPS, is amendment of the first sentence required so as to read: “The works must protect, conserve and, where possible, enhance the building’s features....”
13. In accordance with Transitional Arrangements, the provisions of PPS 6 will cease to have effect when the Council adopts its Plan Strategy. Paragraphs 6.5 and 6.25 thereof set out

material considerations when it is proposed to demolish a LB in whole or in part. The SPPS makes provision for LBs on page 39 but does not provide the same depth of policy in respect of such a proposal.

- a. Did the Council take account of the provisions of PPS 6 in this respect?
 - b. Criterion (c) of paragraph 6.25 of PPS 6 cites “substantial benefits for the community” as a material consideration. Does omission of this factor as a material consideration ensure that Policy BH1 is sufficiently flexible?
- 14.
- a. With regard to paragraph 7.4.8 of Policy BH1, did the Council take account of: RDS RG11; paragraph 3.30 (bullet points 2 and 3) of the SPPS; and paragraph 6.12 of the SPPS with regard to a LB’s potential setting within planned demesnes or the natural landscape?
 - b. To ensure consistency with the RDS and SPPS in these respects, is amendment of the opening of the paragraph necessary so that it would read: *“The setting of a listed building is often an essential part of the building’s character. This may include both the rural landscape and/or the urban townscape context. In some circumstances this may include adjacent boundaries, buildings or an entire street. These contextual elements may not necessarily be of great individual merit but combine to produce an understanding of the character of the setting which enriches the listed buildings”*.
15. Did the Council take account of paragraph 6.5 of PPS 6 and criterion (c) that cites the group value of LBs as a generally relevant issue to the consideration of all listed building consent (LBC) applications and planning applications affecting a LB?
16. Monitoring Indicator 14 in Annex F of the dPS – Would use of the number of buildings removed from the Built Heritage at Risk Register, by way of re-use and regeneration, be a more coherent and effective test of policy than aiming to limit demolition to less than 10% of buildings on the Register over a 5-year period?

Conservation Areas

17. The Council seeks to address what it refers to as 3 no. *“Typographical and drafting errors”* as follows:
- a. Under the sub-heading Alterations and extensions amend the text so that it would read: *“Planning permission will only be granted for alteration and extensions within conservation areas where the criteria in Policy RD2 are met, and...”*;
 - b. The *“and/or”* after criterion j would be replaced by *“and”*; and
 - c. Criterion k. would read: *“The design quality of the proposed redevelopment is considered to....”*

Its rationale for doing so has been set out in its *“Draft Plan Strategy – Public consultation report August 2019”* ([Link](#)) (page 447). Over and above that evidence is there anything that the parties want to add in this respect?

18. Would amendment of criteria j and k provide a clearer mechanism for implementation and monitoring whereby they would read: The existing building makes either a negative or no material contribution to the character and appearance of the area?
19. In response to representations, the Council suggests 2 no. *“minor modifications”* to the wording of:
 - a. The final paragraph of Policy BH3 so that it would read: *“Where consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site; and appropriate arrangements for recording the building before its demolition”*; and
 - b. Paragraph 7.4.25 would be expanded to include: *“Where consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site; prohibition of demolition until contracts have been signed for the approved redevelopment of the site; and, where appropriate, the recording of the building prior to its demolition.”*
 - i. The Council’s rationale for doing so has been set out in its *“Draft Plan Strategy – Public consultation report August 2019”* ([Link](#)) (page 448-450 inclusive). Over and above that evidence is there anything that it wishes to add in this respect?
 - ii. Did the Council take account of paragraph 6.19 of the SPPS, final bullet point that refers to: *“appropriate arrangements for the redevelopment of the site”*?
 - iii. In order to provide clear mechanisms for implementation and monitoring does the justification and amplification text need to be expanded to define what is meant by: *“prior agreement for the redevelopment of the site”*?
20. In response to representations, the Council suggests 2 no. further *“minor modification”* to the wording of:
 - a. Paragraph 7.4.18, final sentence would conclude: *“...cornices, roof silhouette, patina etc.)”*; and
 - b. Paragraph 7.4.21 would read: *“Façade retention of a building which makes a significant contribution to the character and appearance of the conservation area will only be acceptable in exceptional circumstances, provided the scale of the overall development proposal will not be detrimental to the character or appearance of the area, and the scheme can be implemented without serious risk to the retained structure. Where a case is made for total or partial demolition....”*.

- i. The Council’s rationale for doing so has been set out in its “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) (page 448- & 458). Over and above that evidence is there anything that it wishes to add in this respect?
 - ii. Is the proposed re-wording of the justification and amplification text with regard to façade retention consistent with the duty imposed by Section 104 (11) of the Planning Act (Northern Ireland) 2011?
- 21.
 - a. Was account taken of the first two sentences of paragraph 6.18 of the SPPS whereby compared to the provisions for demolition within Conservation Areas (CAs) set out in Policy BH2, the dPS appears to suggest a different level of protection?
 - b. In respect of the policy’s first sentence under the heading demolition was account taken of the final bullet point of paragraph 6.19 of the SPPS, which arguably sets a more stringent policy threshold for demolition?
 - c. In light of these apparent discrepancies with regional policy should the second sentence under the heading demolition be amended to read: “*The presumption of total or partial demolition of a non-listed building will only be permitted in exceptional circumstances where:*”
- 22. Was account taken of the provisions of paragraph 6.18 of the SPPS where it identifies other material considerations that may outweigh the general presumption against demolition of unlisted buildings in CAs?
- 23. In accordance with Transitional Arrangements, the provisions of PPS 6 will cease to have effect when the Council adopts its Plan Strategy. Paragraph 7.17 thereof refers to the criteria set out at paragraph 6.5 and policy BH 10 thereof set out material considerations relating to demolition in a CA. The SPPS makes provision for demolition of non-listed buildings in conservation areas at paragraphs 6.18 and 6.19 but does not provide the same depth of policy in respect of such a proposal.
 - a. Did the Council take account of the provisions of PPS 6 in this respect?
 - b. Criterion (c) of paragraph 6.25 of PPS 6 cites “*substantial benefits for the community*” as a material consideration. Does omission of this factor as a material consideration ensure that Policy BH2 is sufficiently flexible?
- 24. If, in accordance with criterion j of Policy BH2 a building is considered to make a negative or no material contribution to the character and appearance of the conservation area, is the requirement for recording it prior to its demolition realistic and appropriate particularly in light of the final bullet point of paragraph 6.19 of the SPPS?
- 25. With regard to the final sentence of paragraph 7.4.21 of the justification and amplification text of Policy BH2:
 - a. Could it hamper the assembly and delivery of redevelopment schemes of large,

complex sites?

- b. Would the requirement be made more flexible by specification that all efforts should be “reasonable”?
26. Criterion e of Policy BH2 requires that regard is given to relevant supplementary planning guidance. Paragraph 6.19 of the SPPS, penultimate bullet point, requires that development proposals should conform with (*my emphasis*) the guidance set out in any published CA design guides. Was account taken of this more stringent requirement of regional policy and what was the Council’s rationale for departing from it?
 27.
 - a. Reference is made to a presumption in favour of retaining listed buildings in conservation areas under both the demolition heading of Policy BH2 and paragraph 7.4.20 of the justification and amplification text. As the presumption in favour of retaining LBs is stated in Policy BH1 and the Council has repeatedly said in its report on public consultation that the Plan should be read in the round, would the provisions of Policy BH2 be clearer if mention of listed buildings were omitted?
 - b. If reference to listed buildings in Policy BH2 and its justification and amplification text is retained, is there tension between Policies BH1 and BH2 in respect of listed buildings within Conservation Areas where arguably a less stringent test for demolition is applicable in the latter?
 28. Reference is made to “*area built heritage asset*” in both paragraphs 7.4.16 and 7.4.28. Would replacement of this phrase by “*Conservation Area*”, “*Area*” or “*built heritage asset*” improve coherence and provide a clearer mechanism for implementation?
 29.
 - a. Looking at Appendix F of the Plan and Monitoring Indicator 15 is the wording of the Trigger consistent with the statutory duty to preserve or enhance a CA?
 - b. In pursuit of that legal duty, would vacancy rates be an appropriate trigger?
 - c. Is the Trigger appropriate or is it arguably setting the bar too low and writing off failure of the Council’s development management and enforcement function?
 30. With regard to Appendix F of the Plan and Monitoring Indicator 17 would re-wording of the Target to: “*Reduction in unauthorised tree felling in Conservation Areas*” provide a more appropriate and coherent mechanism for monitoring?

Any other issues

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Topic 17: Shaping a Liveable Place – Built Heritage (JdeC) - Contd

Conservation areas (Contd if necessary)

See questions 17 – 30 inclusive.

Areas of townscape character

31. Taking account of the fact that permission is required for the demolition of a LB by virtue of Section 85 of the Planning Act (Northern Ireland) 2011, should the words “*listed buildings and*” be deleted from the first sentence under the “*Demolition*” heading in order to be consistent with legislation?
32.
 - a. In instances where city corridors may fall within Areas of Townscape Character (ATCs), are the requirements of criterion a of Policy BH3 consistent with the Penultimate sentence of paragraph 6.2.16, which states that frontages onto city corridors can therefore benefit from higher densities of development?
 - b. Do these provisions, when read together, provide a clear mechanism for implementation?
 - c. Is substitution of the word “*will*” for “*normally*” in the first sentence of Policy BH3 necessary in order to provide reasonable flexibility in such instances?
33. Paragraph 7.4.23, 1st sentence – reference is made to the “*distinctive character and appearance*” of the area. For the sake of consistency and coherence, should criterion a of Policy BH3 refer to “*The area’s distinctive character and appearance is maintained....*”?
34. in its “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)), the Council suggests a “*minor modification*” to the wording of:
 - a. The final paragraph of Policy BH3 so that it would read: “*Where consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site; and appropriate arrangements for recording the building before its demolition*”; and
 - b. Paragraph 7.4.25 would be expanded to include: “*Where consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site; prohibition of demolition until contracts have been signed for the approved*

redevelopment of the site; and, where appropriate, the recording of the building prior to its demolition.”

- i. The Council sets out its rationale for the proposed changes at pages 458 & 459 of the aforementioned report – is there anything it wants to add?
 - ii. Did the Council take account of paragraph 6.19 of the SPPS, final bullet point that refers to: *“appropriate arrangements for the redevelopment of the site”*?
 - iii. In order to provide clear mechanisms for implementation and monitoring does the justification and amplification text need to be expanded to define what is meant by: *“prior agreement for the redevelopment of the site”*?
35. a. Looking at Appendix F of the Plan and Monitoring Indicator 15 is the wording of the Trigger consistent with the provisions of paragraphs 6.21 and 6.22 of the SPPS?
- b. Is the Trigger appropriate or is it arguably setting the bar too low and writing off failure of the Council’s development management and enforcement function?
- c. In pursuit of that legal duty, would vacancy rates be an appropriate trigger?

Works to grounds affecting built heritage assets

36. Has Policy BH4 taken account of the provisions of RG11 of the RDS and the SPPS, in particular paragraphs 6.1, 6.16 and 6.17 in respect of built heritage assets (as defined by Policy BH4) in a rural context?
37. What is the relationship of Policy BH4 to Policies BH1, BH2 and BH3 that provide individual and varying tests for development affecting the setting of LBs and within CAs and ATCs?
38. With regard to the first sentence of Policy BH4, do the words *“development in”* need to be deleted to make it policy coherent and provide clear mechanisms for implementation?
39. a. Criterion d. – Is inclusion of the phrase *“age and style”* consistent with the legislative requirement of Section 104 (11) of The Planning Act (Northern Ireland) 2011 whereby modern and/or contemporary design interventions may be consistent with preservation and/or enhancement of a CA?
- b. Would inclusion of the aforementioned phrase rule out such design interventions within the grounds of built heritage assets?
- c. Would amendment of the wording of criterion d. so that it would read *“...in keeping with the essential character of the property and the area and of a mass similar...”* be more consistent with Departmental policy and, where applicable, legislation?

40. At paragraph 7.4.28 reference is made to “*area built heritage asset*”. Would replacement of this phrase by “*built heritage asset*” improve the text’s coherence and provide a clearer mechanism for implementation?

Archaeology

41. Looking at criterion a. of Policy BH5, second sentence. Use of the word “*comprise*” rather than the phrase “*for example*” suggests that the archaeological remains mentioned thereafter are the complete range of those of regional importance. In this context, for the sake of completeness, should reference to Areas of Significant Archaeological Interest be included not only in criterion a. but also paragraph 7.4.31?
42. Criterion d. of Policy BH5, final sentence. Does this need to be changed to read: “.....the completion of a licensed excavation and recording, examination and archiving the archaeology before development commences” in order to be consistent with paragraph 6.11 of the SPPS?
43. Paragraph 7.4.29 – The first sentence seems to echo RG11 of the RDS but does not include reference to built heritage. Has the wording of RG11 and the first bullet point of paragraph 6.4 of the SPPS been taken account of?

Parks, gardens and demesnes of special historic interest

44. Does Policy BH6 take account of:
1. The provisions of paragraphs 6.16 and 6.17 of the SPPS?
 2. RG11 of the RDS and the 1st bullet point of paragraph 6.4 of the SPPS or does it need to be amended to read: “The council will seek to conserve, protect and enhance.....”

Any other issues

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Topic 18 - Community cohesion and good relations (JdeC)

1. Is criterion a. of the policy consistent with the provisions of Section 27 of the Planning Act (Northern Ireland) 2011 and paragraph 4.17 of the SPPS or should it be deleted in order to provide clear mechanisms for implementation?
2. Does criterion b of the policy need to be deleted in order to provide clear mechanisms for implementation?
3. In order to provide clear mechanisms for implementation, does criterion c of the policy need to be amended so that it would read: *“Where the opportunity exists to provide future connectivity across peace infrastructure and create permeable neighbourhoods, this should be incorporated into design proposals”*?

Any other issues

Topic 19 - Promoting healthy communities (JdeC)

1. The policy (3rd paragraph) refers to *“significant development proposals”*, *“major residential, commercial and industrial developments”* and *“other proposals with potential to have a significant adverse effect on public health and wellbeing”*. In the absence of definition of these terms in the Plan’s Glossary or a quantifiable threshold for when a Health Impact Assessment (HIA) would be required, are there clear mechanisms for implementing the policy?
2. How would it be established that a proposal would not have the potential to have a significant adverse effect on public health and wellbeing without a HIA being carried out? What form of *“screening”* mechanism would be used?
3.
 - a. Does the policy’s final paragraph preclude instances where health and wellbeing improvement measures could be secured by way of a planning condition rather than a legal agreement? For example, where off-site works and/or a financial contribution in lieu are not required?
 - b. By not specifying this possible alternative means of achieving the policy objective is it reasonably flexible to enable it to deal with changing circumstances?

Any other issues

Topic 20 - Community Infrastructure (JdeC)

1. Regarding the policy's 5th paragraph, would quantifying that community infrastructure should be within 400m or 5 minutes' walk from public transport provide a clear mechanism for implementation and monitoring in respect of "*good accessibility to existing services and facilities intended to serve future residents*"?
2. Does reference to a "*Health Equity Tool*" for determining the impact of new community facilities on reducing health inequalities need to be included in order to provide a clear mechanism for implementation and monitoring of the policy?
3.
 - a. Does the policy's final paragraph preclude instances where provision of new community infrastructure requirements could be secured by way of a planning condition rather than a legal agreement? For example, where off-site works and/or a financial contribution in lieu are not required?
 - b. By not specifying this possible alternative means of achieving the policy objective is it reasonably flexible to enable it to deal with changing circumstances?

Any other issues

Topic 21 – Inclusive economic growth (JdeC)

Inclusive economic growth

These first 3 questions are for Belfast City Council only

1. What account was taken of the provisions of Planning Policy Statement 4: "Planning and Economic Development" (PPS 4), paragraphs 4.19 – 4.21 inclusive "*Preparing Development Plans*"?
2. In respect of economic development, industry and commerce the SPPS refers to "*normal planning criteria*" at para 6.91. However, this is supplemented by Policy PED 9 of Planning Policy Statement 4: "*Planning and Economic Development*" (PPS 4) that lists 13 general criteria that a proposal for economic development use will be required to meet. As PPS 4 will cease to have effect when the Plan Strategy is adopted, do the inclusive economic development policies that refer to "*normal planning considerations*" provide clear mechanisms for implementation in this respect?
3.
 - a. Policy PED 8 of PPS 4 provides a safeguard for existing or approved economic development uses from proposals that would be incompatible or that would prejudice their future operation. The dPS does not appear to afford the same protection to such uses unless where alternative uses are proposed on zoned employment land. In this respect, did the Council take account of the requirements of Policy PED 8?
 - b. Is the absence of such a safeguard, is the dPS consistent with the provisions of paragraph 6.90 of the SPPS?

- c. If the aforementioned provisions of PPS 4 are considered applicable, was account taken of criterion (k) of paragraph 4.21 thereof?

Employment land supply

4. Has account been taken of the RDS at RG1 with respect to its first bullet point and Table 3.1 thereof?
5. Looking at Section 4 of the Council's Urban Capacity Study (UCS), where is the Council's evidence set out that provides the evaluation framework identified by each of the 3 stages of the RDS's Table 3.1?
6. Page 29 of the UCS, final sentence of Section 4.3 reads: *"It should be noted that several of the existing employment designations extend outside of the current urban footprint used for this study"*. In this respect can the UCS exercise fulfil the role of The Employment Land Evaluation Framework that the RDS advocates?
7. Paragraph 8.1.15 of the Plan, final sentence – given that no allowance has been made for existing capacity, does the Plan set out a coherent strategy in respect of employment land supply?
8. In its *"Draft Plan Strategy – Public consultation report August 2019"* ([Link](#)) at pages 275 & 276, (points 1 and 4), the Council addressed particular concerns regarding its approach taken in the UCS. Taking into account this evidence, is Policy EC2 realistic, appropriate and founded on a robust evidence base?
9. In its *"Draft Plan Strategy – Public consultation report August 2019"* ([Link](#)) at page 276, main issues 3, the Council addressed concerns regarding alleged inaccuracies in the recording of committed site employment yields. Taking into account this evidence is Policy EC2 realistic, appropriate and founded on a robust evidence base?
10. Mindful of what the Council has said in *"Draft Plan Strategy – Public consultation report August 2019"* ([Link](#)) at pages 287 (point 4), page 288 (points 6 & 7) and page 289 (points 10, 12 & 13), does its approach and assumptions applied to assessment of existing capacity underplay the need for employment space over the plan period?
11. Notwithstanding how the Council has rebutted associated concerns in the aforementioned report (in respect of both Policies EC2 and EC6), is employment floorspace capacity across the city centre overstated and likely to be the subject of a number of delivery constraints over the plan period?
12.
 - a. Does the Council's evidence base mask allegedly important nuances in demand across different sectors and locations?
 - b. in its *"Draft Plan Strategy – Public consultation report August 2019"* ([Link](#)) at pages 287 & 288 (point 5) and pages 289 & 290 (point 14), the Council addressed particular

concerns that its policies aimed at creating a vibrant economy take no account of the different types of employment space that may be needed. Is the policy, as regards Class B uses, realistic and appropriate on the basis of its evidence?

13. In its *Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) the Council has rebutted challenges to its evidence base as being deficient in its consideration of a number of trends on take up of office space. With differing perspectives on this issue, how can the Commissioners be sure that the policy and allocations are realistic and appropriate?
14. In quantifying employment land supply has account be taken of the strategic, spatial implications of paragraph 6.92 of the SPPS whereby LDPs should offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity?
15. How does the Council’s evidence base support its rebuttal in its “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) of the assertion that Policy EC2 is too restrictive to yield the 46k additional jobs that the Plan’s growth strategy aspires to?
16. At page 289 (points 11 & 15) of the aforementioned report, the Council has responded to criticism: that its approach solely aims to forecast job growth without any buffer; and that the allocated quantum of floorspace is too inflexible to enable the Plan to respond to market changes. On this evidential basis:
 - a. Is the policy realistic and appropriate; and
 - b. What alternatives were considered?
17. When the Council referred the dPS to the Department for independent examination on 30th August 2019 we were blissfully unaware of Covid-19 and it is not a matter that the Council could have reasonably foreseen when preparing the document. There is no certainty that the associated upsurge in working from home (either full-time or part-time) and increased reliance on video conferencing technology rather than in person meetings will continue and/or grow during the life-time of this Plan. Nevertheless:
 - a. Are these potentially influential factors on employment land matters that the Council has considered subsequent to referral of the dPS;
 - b. What weight should reasonably be given to these considerations whether this element of the dPS meet the soundness tests of DPPN 6?; and
 - c. If the Commissioners were to conclude that this is a material consideration that the Plan should address notwithstanding the caveats set out above, could this be accommodated within the framework of the current dPS?
18. Paragraph 8.1.18 of the Plan refers to the “*substantial oversupply of employment space*”. In light of this, does the Plan set out a coherent strategy for managing that issue in the absence of strategic policy as to best use of this surplus?

19. Criticism has been levelled that the policy is not founded on a robust evidence base as it has not been shown:
- a. How the transport network has been considered as a facilitator for the planned growth in terms of its capacity and future transport proposals; and
 - b. That account has been taken of the cumulative impact of additional development and transport demand arising from neighbouring Councils and potential changes in DfI's transport network and its management.

Is the dPS sound in these respects?

20. In the interests of sustainability and pursuit of providing clear mechanisms for implementation and monitoring has the Council considered the suggestion of phasing the supply of employment land to encourage a sequential approach to use of existing employment floorspace and other committed developments?
21. In response to representations, the Council suggests a "*minor modification*" to the wording of the first sentence of the policy so that it would read: "*A total of 550,000sq.m. of gross floorspace for employment uses....*" Its rationale is set out at page 460 of the Council's "*Draft Plan Strategy – Public consultation report August 2019*" ([Link](#)) – have the parties anything to add in this respect?
22. a. Does reference to "*Rest of Belfast City*" provide a clear mechanism for monitoring?
- b. In the Council's response to key issues raised, it said that it considers the phrase to apply to lands within the plan area but outwith the city centre and Belfast Harbour Estates. Would addition of that clarification to the justification & amplification text provide a clearer mechanism for implementation and monitoring?

Any other issues

**Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Monday 22nd February 2021**

Topic 21 – Inclusive economic growth (JdeC) – Contd

Employment land supply continued if necessary

See questions 4-22 inclusive

Office development

23. Is the wording of paragraph 8.1.39 of the dPS clear and coherent or is the insertion of punctuation or some other amendment required to make it so?
24. a. One of the Council’s responses at page 293 of its “*Draft Plan Strategy – Public consultation report August 2019*” ([Link](#)) suggests that where the policy refers to new office development within the city centre that it is floorspace within new buildings rather than that which might be yielded by conversion of existing floorspace from other uses. If this is the intention, is a correspondent amendment to the policy or justification and amplification text needed in order to provide clear mechanisms for implementation and monitoring?
- b. If the Commissioners have correctly understood the Council’s intention in this respect, what strategic policy provision does the dPS provide for schemes to adapt existing buildings for office use within the city centre; would such proposals be considered to contribute to the quantum of employment floorspace that Policy EC2 allocates to the city centre?
- c. In the aforementioned response at point a, the Council said that it disagrees with the proposition that there should be a presumption that the need for new office development in the city centre should, where possible, be met through the use of existing buildings. However, it does not explain its rationale for that response. Indeed, the representation would seem to be totally aligned with the provisions of Policy BH1 of the dPS as regards the change of use of a listed building. Is dismissal of this suggested alternative approach founded on a robust evidence base?
25. Is there a significant need and demand for office floorspace in growing Belfast City, as the dPS growth strategy envisages, beyond that currently recognised in the Plan and its evidence base?

26. in its “Draft Plan Strategy – Public consultation report August 2019” ([Link](#)) at pages 287 & 288, the Council addressed particular concerns that its policies aimed at creating a vibrant economy take no account of the different types of employment space that may be needed.
- a. Is there a lack of choice and supply and location of office floorspace that has the potential to undermine Belfast’s role as the primary office location in NI that could result in inward investment being lost?
 - b. Does demand for office floor space extend beyond the boundary of the city centre?
 - c. Is a more flexible approach required in order to mitigate against demand not being met as a result of insufficient choice within the supply of new floorspace?
27. At page 287 of the aforementioned report the Council addressed concerns that it does not recognise Titanic Quarter (TQ) as an important segment of the “city centre” commercial office market & location choice for offices. Is there anything that the parties want to add in respect of this response?
- 28.
- a. Has account been taken of the RDS SFG3 specifically with regard to the second bullet point of paragraph 3.46 thereof where the growing role of Titanic Quarter in enhancing the employment potential of Belfast City Centre is acknowledged?
 - b. Does TQ represent a “*growth of the city centre*” with an offer that complements rather than competes with the defined city centre?
 - c. Should the dPS recognise this alleged complementary role?
 - d. It has been suggested that as Titanic Quarter arguably offers greater flexibility in terms of floor plates, parking convenience, access to road and airport infrastructure than the defined city centre and that insufficient cognisance has been given to its market potential. Is the policy realistic and appropriate in light of these considerations?
 - e. Did the Council have regard to Invest NI’s Business Strategy in respect of TQ?
 - f. At page 290, point 17 of the aforementioned report, the Council responds to representation that new employment sites at TQ have been overlooked despite identification in its Regeneration & Investment Strategy as a location suitable for office development. Is there anything that the parties want to add in this respect?
 - g. With regard to TQ, did the Council have regard to the Belfast City Regional deal and the “investment pillar” comprising a focus on innovation and digital industries?
29. Did the Council have regard to the Belfast City Centre and Investment Strategy specifically in respect of:
- a. Its view on what constitutes Belfast city centre;

- b. Its “significant” city centre employment role “in terms of providing choice to occupiers”; and
 - c. Its identification of Titanic Quarter as a key Grade A office site in its “Section 3: Policies for the City Centre”.
30. Did the Council have regard to The Smart Belfast Framework 2017 to 2021: Supporting Urban Innovation specifically with regard to:
- a. Locations that could be considered, or could become, centres of innovation; and
 - b. The identification of innovation hubs as a means of attracting inward investment and providing complementary resources that would generate further investment and economic development?
31. a. Taking account of the provisions of paragraph 6.85 of the SPPS, first sentence, what is the rationale for the ceiling of 400 sq.m. gross floorspace on office development within district and local centres?
- b. Is this floorspace ceiling reasonably flexible to enable the Plan to deal with changing circumstances say in a District Centre where a health check shows that it is not performing as such and/or taking into account the increased employment opportunities that larger units might yield?
 - c. Looking at Appendix F: Monitoring Indicators and indicator 22 one of the targets is no office developments of over 1,000 sq.m. outside the City Centre. Are the provisions of the policy consistent with the first two bullet points of the SPPS regional strategic objectives at para 6.271 given that, outside the city centre, developments of more than 400 sq.m. could be permitted outside district and local centres?
32. It has been suggested that in order to make the dPS sound that the policy should, along the frontage of City Corridors, allow office accommodation of up to 200 sq.m. either by upper floor change of use or by sensitive infill development of brownfield sites. Would such an amendment take account of the SPPS’s regional strategic objectives for town centres (paragraph 6.271) and the provisions of paragraphs 6.273 and 6.275 thereof?
33. Looking at the dPS Appendix F: Monitoring Indicators and indicator 22, there is an apparent discrepancy between the target for the Queen’s Office Area and the provisions of Policy EC6. The former says that within that Area that proposals for Use Class B1 (a) and A2 will not exceed 400 sq.m. However, the policy sets no ceiling for Queen’s University office development and a limit of 200 sq.m. for other developers. Does the policy and its associated Monitoring Indicator provide clear mechanisms for implementation and monitoring?

**Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Tuesday 23rd February 2021**

Topic 21 – Creating a Vibrant Economy – Inclusive Economic Growth – Contd

Office development continued if necessary

See questions 22 – 33 inclusive.

Major employment and strategic employment locations

34. In its “Draft Plan Strategy – Public consultation report August 2019” ([Link](#)) at page 280, the Council addressed particular concerns regarding the strategic policy basis for directing development identified by Policy EC3 to major employment locations (MELs) and strategic employment locations (SELs). On this basis and in this particular respect, does Policy EC3 satisfy tests C1 and C3 of DPPN 6?
35. Paragraph 8.1.25 of the dPS sets out transitional arrangements for implementation of this policy pending adoption of the LPP. The maps provided in Volume 4 of the papers forwarded to the Commission (BCC-DPS-TS17-M15) refer to “Existing Employment Areas” and do not differentiate between MELs and SELs. Maps 4/001 - /004 inclusive of Part 4, Volume 2 of Belfast Metropolitan Area Plan (dBMAP) refer to only Major areas of existing employment/industry. Appendix A: Existing/draft Policy Designations at page 313 of the dPS refers to 4 dBMAP zonings that are designated as employment locations. In the absence of a definition of either term in either strategic policy or the dPS Glossary:
- a. How will each designation be defined and applied in the transitional period? and
 - b. Are there clear mechanisms for implementation and monitoring?
36. Figure 8.3 of the dPS shows existing employment locations and the Belfast Harbour area whereas paragraph 8.1.22 of the DPS refers to “Belfast Harbour Major Employment Location”. In the interests of providing clear mechanisms for implementation and monitoring of the policy is clarity required on the proposed status of Belfast Harbour area in this context?
37. Without the following clarification are the proposed designations and policy realistic and appropriate?
- a. What is the perceived function of SELs?
 - b. How will this differ from the purpose of designating MELs?

- c. Provisions for Use Classes B1 (b) and (c) refer to existing employment areas – how does this relate to the proposed SELs and MELs?
38. With regard to the policy’s provisions for Use Classes B1(b) and (c), has the Council assessed whether these locations are accessible by sustainable modes of transport?
39. Are SELs and MELs to be considered in terms of a hierarchy or subject to a sequential test? In the absence of this point being addressed, are there clear mechanisms for the policy’s implementation and monitoring?
40. In the context of the policy’s provisions for Use Class B1(a):
- a. What does “*accommodated*” mean? Would its definition be limited to the availability of the required quantum of floorspace without taking into account other potential factors such as its perceived suitability for the user in terms of location, quality, layout etc? and
 - b. Without explicit definition, would the policy provide clear mechanisms for implementation and monitoring?
41. The policy refers to proposals “*complementary to the primary employment use*”. Without a definition of what constitutes “*complementary*” are there clear mechanisms for implementation and monitoring in this respect?

Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Wednesday 24th February 2021

Topic 21 – Creating a Vibrant Economy – Inclusive Economic Growth – Contd

Loss of zoned employment land

42. Does Policy EC4 take account of:
- a. RG1 Of the RDS, especially the three bullet points on page 32 thereof?
 - b. Paragraphs 6.89 and 6.92 of the SPPS; and
 - c. Policy PED 7 of PPS 4 as it applies to zoned land in all locations?
43. The dPS makes no provision for the redevelopment for housing and mixed-use of land not zoned for employment uses but with either planning permission for the same, with existing industrial and business use thereon or on land last used for those purposes. In its *“Draft Plan Strategy – Public consultation report August 2019”* ([Link](#)), the Council says (page 283) that proposals for the redevelopment of unzoned land will be considered on a case by case basis having regard to other policies within the dPS. In these respects:
- a. What account was taken of Policy PED 7 of PPS 4 where it provides policy for the redevelopment of unzoned land in settlements?
 - b. As paragraph 6.89 of the SPPS applies to such lands, what account was taken of it?
 - c. Would this approach provide a coherent strategy with clear mechanisms for implementation?
44. Is Policy EC4 coherent in that is compatible with Policies SP1 and HOU2 of the dPS or is it likely to encourage windfall housing supply on zoned employment land?
45. In not allowing for the possible redevelopment of zoned industrial land for housing or mixed-use development subject to other potential concerns being satisfied, such as compatibility with adjoining land uses, is the policy reasonably flexible to enable it to deal with changing circumstances?
46. The Council’s Technical Supplement 3 – Employment and Economy, at various junctures, says that there is a substantial oversupply of employment space within the Council area. On that evidence base, are the *“exceptional circumstances”* outlined in the policy realistic and appropriate?

47. Criterion b. 3 – What was the Council’s evidence base for stipulating 18 months’ active marketing?
48.
 - a. Is a review of the “*similar policies in GB*” referred to in its Public consultation report (page 283) available as part of the Council’s submission evidence?
 - b. What consideration was given to alternatives to this time-scale?
49. Are the requirements of criteria a. and b.3 realistic and appropriate or do they have the potential to stymie investment and regeneration?
50. The contention has been made that the “*exceptional circumstances*” are too restrictive saying that regeneration schemes are often retail led for viability reasons and examples were given of such instances. Without getting into those site-specifics, is the policy realistic and appropriate in this respect and is it reasonably flexible to enable it to deal with changing circumstances?
51. RDS RG1 identifies, amongst other things, the utility of an Employment Land Evaluation Framework as confirming existing sites to be replaced or released subsequent to their ‘*fitness for purpose*’ having been assessed. In the absence of such a robust evidence base are the “*exceptional circumstances*” identified in Policy EC4 realistic and appropriate as they do not seem to take account of changing market demands whereby older employment locations are considered as low order, secondary locations?
52. Has account been taken of the guiding principle set out in the Executive’s Sustainable Development Strategy – “*Everyone’s Involved*”, namely achieving a sustainable economy (see paragraph 3.2 of the SPPS)?
53. Has account been taken of RG7 of the RDS?
54. Having taken views on all the foregoing questions on this policy into consideration:
 - a. Is it consistent with the provisions of paragraph 5.7 of the SPPS? And
 - b. Does it have the potential to undermine the function of MELs and SELs especially with regard to the first sentence of the final paragraph of Policy EC3?
 - c. In light of the provision of Policy EC4, what is the rationale for including the final paragraph of Policy EC3?
55. The policy refers to proposals “*complementary to the primary employment use*”. Without a definition of what constitutes “*complementary*” are there clear mechanisms for implementation and monitoring in this respect?

Industry and storage and distribution uses

56. Is there an error in second paragraph, first sentence, third line of the policy whereby the word “*use*” appears to have been inserted after “*rural settlements*” rather than “*Class B4 storage or Distribution*”?
57. In regard to small rural settlements, does the policy provide a clear mechanism for implementation?

Any other matters

**Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Monday 1st March 2021**

Topic 22 : Creating a Vibrant Economy – Retail (RD)

Retail Policy Aims

1. Technical Supplement 4 refers to a retail capacity study to what extent has this study informed the retail strategy in the dPS and consequently the policy aims at paragraph 8.2.4?
2. Does the dPS aim to influence the appropriate locations for additional retail floor space or is this a matter for the local policies plan designations?
3. What is the most up to date survey information available of retail floor space for stores/centres with the plan area?
4. Paragraph 8.2.2 advocates to maintain viability of the city centre the plan will adopt the sequential approach to growth. Should the word ‘will’ be replaced with ‘must’ to offer stronger protection for retailing in the plan area?
5. What considerations have the Council given to the emerging issues arising from the Covid Pandemic on the role and function of Belfast City as the primary location for retailing in the region?
6. As a general point should matters of transportation and accessibility be a specific consideration in the context of the proposed retail policies?

Establishing a centre hierarchy

7. Should title of policy RET1 refer/include reference to the city centre rather than town centres?
8. The Council have stated the intention of Policy RET1 is to offer strong protection of town centres in accordance with the SPPS. A minor modification to the policy wording has been presented to provide greater clarity so that the policy will read “*the sequential approach directs development to the town centre before considering an edge of centre site. Consideration.....*” Does this minor amendment satisfy concern relating to any conflict with paragraph 6.287 of the SPPS?
9. With exception to definition of ‘city corridors’ contained in the glossary in the dPS, does the SPPS provide a definition of city corridors? In the context of retail hierarchy where do city corridors sit? Do City Corridors perform the same or similar role to local centres?

Can the Council provide wherein the dPS recognises that City Corridors perform a retailing role that complements local centres?

10. Policy RET1 sets out the hierarchy and the sequential order of preference. Does or should Policy RET1 differentiate between major district centres and district centres? Will the Local Policies Plan categorise/define the hierarchy and order of retail centres? Does the lack of these definitions mean the dPS is unsound?
11. How does Policy RET1 sit with retail proposals that involve an alteration or extension to existing retail stores and which will not affect existing centres?

Out of Centre development

12. Paragraph 6.280 of the SPPS sets out regional policy in respect of a sequential test for main town centre uses that are not in an existing centre. Does it need to be repeated in the dPS?
13. Does Policy RET2 go beyond what would be considered reasonable when assessing the suitability, availability and viability of alternative sites?
14. How does the wording of Policy RET2 reflect the last two lines of paragraph 6.279 of the SPPS which states that all proposals must ensure there will be no adverse impact on the vitality and viability of an existing centre within the catchment which may include retail facilities outside the Council boundary?
15. How does the dPS envisage proposals under the threshold of 1000 sqm will be assessed in the context of Policy RET2? Or is it as the Council have stated a matter to be considered through the development management on a case by case basis?
16. Would 'centres including city corridors' offer a sequentially better option for out of centre development in the context of Policy RET2? Or is the case as already stated by the Council that City Corridors are not centres performing a retail role that complements local centres?
17. As already noted above how does Policy RET2 envisage with proposals that relate to improvements of existing out of centre retailing? Will the assessment of suitability, availability and viability apply to existing out of centre retailing? Should the policy headnote refer to 'future' main town centre uses outside of existing centres in order to offset any ambiguity?
18. With the event of an up to date LDP does that negate the requirement of a needs test as indicated at paragraph 6.282 of the SPPS? Should more clarity be given to in the dPS to the assessment of need?

District Centres, local centres and city corridors

19. If city corridors are not defined in the retail hierarchy set out in the SPPS, why are 'city corridors' referred to in the title of this Policy?

20. Policy RET1 sets out the centre hierarchy. Is Policy RET3 consistent with this hierarchy and does it provide clear distinction between district centres, local centres and city corridors?
21. Should this policy only be considered when there is no suitable alternative sites within the City Centre and edge of centre in line with the retail hierarchy and SPPS. Does the wording of Policy RET3 need to emphasis this?
22. What is envisaged by the wording of Policy RET3 when it states 'a district centre first approach will apply'? Does the further sequential test of Policy RET3 repeat or conflict with tests stated in Policies RET2 and RET1 of the dPS?
23. Does the further sequential test of Policy RET3 repeat or conflict with tests stated in Policies RET2 and RET1 of the dPS?
24. In respect of local centres is further clarity necessary in the policy wording (Policy RET3) on the exceptional circumstances where a clear quantitative need is identified? How will this be assessed?
25. Does the prohibition of comparison shopping along City Corridors (arterial routes) as indicated by Policy RET3 have the potential to reduce the vitality and economic viability of these neighbourhoods? Would an allowance of 200 sqm of retail floor space for comparison shops and the re-introduction of a 500 sqm net retail floor space for convenience stores along city corridors reduce any perceived concern to the centre retailing hierarchy in such areas of the city?
26. What consideration does the dPS provide for the District Centres that overlap between the plan area and the neighbouring Council areas? The Council have referred to its consultation response to the dPS DFI states there is no requirement for a council to assess other sequentially preferable sites in other Council areas. Is a copy of this response available?
27. Should Policy RET3 apply to all retail proposals, not just the major retail proposals i.e this over 1000sqm?
28. Why does the Council view that criteria (b) and (c) should not be deleted from the headnote of Policy RET3?
29. Referring to the Councils response at page 309 does the Council envisage supplementary guidance on the matter of District Centres? This has not been referred to in appendix E?

Retail warehousing

30. Where do proposals for retail warehousing sit in line with the retail hierarchy stipulated by Policy RET1 and that indicated by the SPPS? How are such areas defined in the context of the retail hierarchy?
31. Policy RET4 states that planning permission will be granted for a limited amount of convenience good shopping to meet a local quantitative need. The policy goes on to

restrict the net for space for such goods to 300 sqm. On what basis is this threshold established? Does it flow from regional policy?

32. Do the floor space thresholds stipulated within Policy RET4 reduce or impact on issues such as flexibility taking account of the economic downturn and more recently the Covid Pandemic?

Primary retail area

33. How does Policy RET5 envisage how proposals for restaurants and café uses will be considered within the primary retail area? Is it appropriate that in order to assess or consider development proposals for cafés and restaurants within the remit of DCAN4?

Temporary and Meanwhile Uses

34. Policy RET6 relates to temporary and meanwhile uses. Criteria (e) and (f) place restrictions on these uses, what is the policy intention of such restrictions?

Any other Issues

**Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Tuesday 2nd March 2021**

Topic 23 – Creating a Vibrant Economy – City Centre (RD)

Development Opportunity Sites

1. Should development opportunity site be restricted to those areas that require a master plan? Is this a flexible approach for the City Centre?
2. Should the heading of Policy CC1 – Development opportunity sites, be consistent with the details of Figure 8.4 which refers to these sites as ‘existing city centre master plan areas’? Is this confusing/coherent to the reader?
3. Why has the Titanic Quarter not been specifically listed on Figure 8.4 as a Masterplan Area? Should Figure 8.4 be enlarged to show the extent of Titanic Quarter?
4. Should the Gasworks Northern Fringe Masterplan be included or referred to on Figure 8.4 and the associated policy headnote?
5. Should this policy specifically refer to or take account of issues relating to accessibility and transport?
6. Criteria (b) of Policy CC1 requires the preparation of a masterplan, urban design and landscape framework. Should the justification and amplification of Policy CC1 provide details on the nature and extent of information to be included within such information? How will such master plans be implemented?
7. Criteria (d) of Policy CC1 sets out a list of details that must be provided with development proposals. One element being the identified land uses. Is this a flexible approach to the future planning and development of these areas?
8. In order to be coherent should Policy CC1 refer the reader to meeting all the other policy requirements to make it more effective and consistent with paragraph 3.9 of the SPPS or other policies contained in dPS?

Any other matters

Topic 24 – Creating a Vibrant Economy – Tourism, Leisure and Culture (JdeC)

Tourism, Leisure & Culture

Questions 1-4 for Belfast City Council only

1. Paragraph 6.264 of the SPPS says that policies for a range of cited tourism development will be contained in the LDP along with criteria for consideration of such proposals. In accordance with Transitional Arrangements, the provisions of Planning Policy Statement 16: “*Tourism*” (PPS 16) will cease to have effect when the Council adopts its Plan Strategy. What account has the Council taken of the aforementioned provisions of the SPPS and Policies TSM1 – 7 inclusive of PPS 16?
2.
 - a. What account has the Council taken of RG4 of the RDS and paragraph 6.263 of the SPPS that promote a sustainable approach to the provision of tourism infrastructure?
 - b. In the absence of specific policies addressing the issue raised in question 1, is the dPS when read in the round, consistent with the RDS in this respect?
 - c. Has account has been taken of the second bullet point of RG4 of the RDS in respect of the City’s Tourist Signature Destination namely, Titanic and Maritime Belfast?
3. Did the Council take account of the provisions of paragraphs 6.260 and 6.261 of the SPPS in respect of tourism development in the countryside?
4. What account was taken of the provisions of paragraph 6.263 of the SPPS?

Supporting tourism, Leisure and Cultural Development

5. With regard to the policy’s final paragraph, would replacement of the word “*particularly*” by “*such as*” make it more coherent and effective by removing the possible implication that some material considerations carry more weight than others regardless of the specifics of any development proposal?

Existing Tourism Leisure and Cultural Facilities

6. As set out in the final sentence of paragraph 6.262 of the SPPS has account been taken of the cumulative impact of proposed, approved and existing development in a locality that would have an adverse impact on a tourism asset, such as to significantly compromise its tourism value?

Overnight visitor accommodation

7. In the absence of a definition of what constitutes “*an existing tourism cluster*” does the policy provide clear mechanisms for implementation and monitoring?

8. In the absence of a definition of what constitutes “*adjacent to*” does the policy provide clear mechanisms for implementation and monitoring?
9. With regard to the policy’s third paragraph, would replacement of the words “*particularly those*” by “*such as*” make it more coherent and effective by removing the possible implication that some material considerations carry more weight than others regardless of the specifics of any development proposal?
10. Figure 2 of the Council’s Technical Supplement 5: Tourism shows that in 2016 6% of visits to NI were for business and 37% for visiting friends and relatives. Paragraph 6.250 of the SPPS and Policy TSM1 express a general presumption in favour of tourism development within settlements. In this context, is it realistic and appropriate to limit the presumption in favour for new overnight visitor accommodation to within the city centre boundary?
11. In order to ensure that supply does not outstrip demand within the city centre, is the permissive approach to the provision of new overnight visitor accommodation in the city centre realistic and appropriate having considered the relevant alternatives and is it founded on a robust evidence base?
12.
 - a. Was consideration given to extension of the policy to include for provision, other than for tourists, subject to a business or locational need?
 - b. Were District Centres considered as a suitable location? What is the rationale for not including them as a relevant alternative?
 - c. What other relevant alternatives to this policy did the Council consider?
13. Figure 3 of the Council’s Technical Supplement 5: Tourism shows that in 2017 The Lagan Valley Regional Park (inc. Lagan Towpath). Are the provisions of Policy TLC3 realistic and appropriate in respect of this tourism asset?
14. The RDS identifies George Best Belfast City Airport as a gateway. What provision does Policy TLC3 make for provision of overnight visitor accommodation; and is the policy realistic and appropriate in respect of its status as such?

Any other matters

Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Wednesday 3rd March 2021

Topic 25 – Building Connected and Resilient Place (RD) - Transportation

Transportation General

1. Without the mechanism of an up to date transportation strategy for the Belfast Metropolitan Area how has the plan formulated the transportation policies presented in the dPS?
2. How has the Belfast City Centre Transport Framework 2017 -2020 informed the general thrust of transportation policies in the plan? Can a copy of this document be provided?
3. To what extent has consultation taken place with neighboring Council's/authorities in respect of the delivery of a transportation policies in the dPS?
4. The Council have proposed a minor amendment at paragraph 9.4.3 to state "***The Departments extant Transport Plan will be the main source for transport policy and initiatives for the plan area***" Any comments on this minor amendment?
5. Should paragraph 9.4.4 make specific reference to highway improvements?
6. Regardless of how the term has been used in the SPPS and in the DFI publications such as the Belfast City Centre Transport Framework 2017 -2020 and guidance on the preparation of LDP policies for transport should paragraph 9.4.5 of the dPS recognise that buses and trains are "motorised transport" as well as a sustainable means of transport?
7. Figure 9.2 illustrates Belfast's transportation network. The Council's minor changes notes that this diagram will include the airport? Anything further to add on this point?
8. In the list of policy aims should the dPS seek to protect and optimise access to and from the airport?

Active Travel – Walking and Cycling

9. Policy TRAN 1 relates to walking and cycling. In order for the policy to be coherent should the policy not indicate that this is only one element or consideration of development proposals, especially as it is the first policy relating specifically to transport?
10. It has been suggested in relation to criterion (c) of Policy TRAN1 this requirement should be broaden to include a 'buffer (within x m of the site) rather than just where it adjoins

the site. I have read the Council's response to this issue. However would the failure to include such a provision make the dPS unsound?

11. In respect of the walking and cycling requirements for development in Policy TRAN1 is the use of S76 Planning Agreements the best way to ensure their implementation?

Transport Assessment

12. Should the wording of Policy TRAN3 and/or the justification and amplification of this policy be strengthened to say that the DFI's Transport Assessment Supplementary Planning Guidance for Development Proposals 'must be considered' rather than stating **should** be considered? Would failure to make this change mean the plan would be unsound?
13. Should paragraph 9.4.15 of Policy TRAN3 make reference to the Council's Developer Contributions Framework guide?

Travel Plan

14. In formulating a travel plan should developers be referred to any available 'Good Practice' guides from other jurisdictions? Does failure to mention this in the policy headnote or the associated justification or amplification mean the plan is unsound?
15. In respect of paragraph 9.4.18 the Council have stated that they will monitor the implementation of the Travel Plan. Would the Council like to explain further how this will be done?

Access to Public Roads

16. The Council have stated that will be delivered through planning conditions or Section 76 Agreements and that DFI will be a consultee in this process. Is there anything further the Council would like to add? Does this satisfy the issue raised by DFI?

Access to Protected Routes

17. As a point the typo at paragraph 9.4.27 of Policy TRAN7 has been noted to refer to Belfast and not Northern Ireland.
18. The have Council have suggested a minor modification involving the removal of the tick from the S76 box in the implementation section of Policy TRAN7? Anything the Council would like to add?
19. In respect of paragraph 9.4.25 the Council have explained that the terminology 'significantly add to congestion' was taken from PPS3 Policy AMP3.
 - a. Will DFI as a statutory consultee be involved in such applications?

- b. Is it likely that such technical assessments on increased congestion be a matter for the statutory consultee to assess?
 - c. Should the wording of the dPS reflect this or is this already covered at paragraph 9.4.29? Furthermore does this paragraph need to specifically reference DCAN15 published by the DOE in order for the plan to be sound?
20. Paragraph 9.4.7 states that 'Figure 9.3 Belfast Protected Routes' is an up to date map identifying existing roads throughout Belfast. Should this paragraph refer to the DFI's published protected routes map?

Car parking and Servicing Arrangements

21. A suggestion has been made to change the title of this policy to 'Parking and Servicing Arrangements'. What consideration has the Council given this? Is the policy as worded unsound?
22. What consideration has the policy given to the (1) parking of coaches; (2) on-street; (3) off street; (4) short stay and overnight provision?
23. The Council consider that it not appropriate at this stage to include the level of detail in the policy in respect of trigger points for when electric vehicle charging points are required. Is there anything further the Council would like to add to this? Does the failure to include such detail in Policy TRAN8 mean that this policy is unsound?
24. Does paragraph 9.4.31 of the justification and amplification for Policy TRAN8 read as contradiction in the incentive to move away from the use of the car over the use of sustainable transport modes?

Any other issues

Belfast Local Development Plan
Draft Plan Strategy 2035
EXAMINATION AGENDA
Monday 8th March 2021

Topic 25 – Building Connected and Resilient Place (RD) - Transportation continued

Parking Standards with areas of Parking Restraint

1. The Council have stated that matters such as density designations is a site specific matter and something that will be considered at the Local Policies Plan stage. Is there anything further the Council would like to add? Does a lack of reference to density designations result in Policy TRAN9 being unsound?

Design of Car Parking

2. Should the wording of the justification and amplification of Policy TRAN10 specifically refer the reader to Policy DES1 in respect of the 'active frontage' of multi-level and basement parking at street level?

Provision of Public and Private Car Parks

3. Technical Supplement 14 Transportation refers to a 'Car parking Strategy'. I note the Council have stated the car parking strategy was published in April 2018 is that correct? Is a copy of this document available? How has this car parking strategy informed Policy TRAN11?

Any other issues

Topic 26 – Delivery (RD & JdeC)

1. The Council responded to a suggestion that a severity rating should be added to the list of indicators in Appendix F of the dPS to enable an assessment of the severity of the situation when a “trigger” is activated. This is found at page 431 of its *“Draft Plan Strategy – Public consultation report August 2019”* ([Link](#)). Are any further comments that participants want to make in response to this evidence? **(JdeC)**
2. In association with the aforementioned suggested amendment, the Council also responded to the issue of expansion of the list of corrective steps in paragraph 11.2.8 of the dPS at page 431 of the aforementioned report. Are any further comments that participants want to make in response to this element of the Council’s evidence? **(JdeC)**
3. At pages 428 & 429 of the aforementioned report the Council has responded to comments about the Plan’s provisions for implementation of its community planning rule as set out in the Belfast Agenda and how this might be more widely applied to monitoring and review. In the context of soundness test CE3 of DPPN 6, are there any further comments that participants want to make in response? **(JdeC)**
4. The Council responded to a suggested specific indicator in relation to Policy EC7 - Higher Education Institutions at pages 430 and 431 of the aforementioned report. Are any further comments that participants want to make in response to this submission? **(JdeC)**
5. The suggestion was made that the dPS should set quantitative commitments to be achieved in the 5 years following the Plan’s adoption e.g. 10,000 new trees, 5,000 new homes, 5,000 new jobs. Without engaging with the specific detail of the examples given, would the principle of quantitative goals provide clear mechanisms for implementation and monitoring? **(JdeC)**

Any other issues

Topic 27 - “Errors and suggested minor modifications” (JdeC)

4. Section 7 of the Council’s *“Draft Plan Strategy – Public consultation report August 2019”* ([Link](#)) “Errors and suggested minor modifications” has already been considered with regard to individual policies and provisions of the dPS. At paragraph 7.1 of that report the Council said that the proposed changes are not of significance, either individually or cumulatively, in terms of the soundness of the plan. In pursuit of the Commission’s letter of 3 July 2020, the Council said at Section 10 of its response that it considers that, either individually or cumulatively, the proposed changes do not go beyond the “minor changes” described in DPPN 10. Whilst this was touched on during earlier discussion of individual proposed corrections and amendments, is there anything over and above evidence already before us that the Council wants to add in respect of their cumulative effect?

Any other issues

Topic 28 - Close

Recurrent Abbreviations

DPPN 4	Development Plan Practice Note 4: <i>“Soundness”</i>
DPPN 10	Development Plan Practice Note 10: <i>“Submitting Development Plan Documents for Independent Examination”</i>
dPS	Belfast Local Development Plan Draft Plan Strategy 2035
PPS 4	Planning Policy Statement 4: <i>“Planning and Economic Development”</i> .
PPS 6	Planning Policy Statement 6: <i>“Planning, Archaeology and the Built Heritage”</i> .
PPS 16	Planning Policy Statement 16: <i>“Tourism”</i> .
RDS	Regional Development Strategy. RDS 2035: <i>“Building a Better Future”</i> .
SPPS	Strategic Planning Policy Statement for Northern Ireland (SPPS): <i>“Planning for Sustainable Development”</i> .
UCS	Urban Capacity Study

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17 December 2020