

Response ID ANON-RWUU-JN1F-2

Submitted to **Belfast LDP 2035 - Plan Strategy**

Submitted on **2018-11-14 15:33:36**

Overview

1. Data Protection

Q1. Please tick to confirm that you have read and understood the privacy notice above.

I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

Q2. Do you consent for us to publish your response?

Yes, with my name and/or organisation

2. Your details

Q3. Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

Individual, Organisation or Agent:

Organisation

Q4. What is your name?

Title:

Mr

Full Name:

David Fry

Q5. What is your telephone number?

Telephone number:

██████████

Q6. What is your email address?

Email:

██████████

Q7. Did you respond to the previous Preferred Options Paper consultation phase?

No

If yes, and you have your previous response ID (beginning ANON) please enter it here::

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

Construction Employers Federation

Your Job Title:

Executive Assistant Director

Address Line 1:

143 Malone Road

Line 2:

Belfast

Line 3:

City:

CO ANTRIM

Postcode:

BT9 6SX

6. Before you submit your comments

7. Is the plan sound?

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

Q12. Do you consider the Plan Strategy to be sound or unsound?

I believe it to be unsound

8b. Unsound

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

5.1.4

Policy (if relevant):

SP1 Growth Strategy

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE4 - It is reasonably flexible to enable it to deal with changing circumstances

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

The council should provide evidence to support the phasing strategy. The current document provides no evidence of an analysis of the market sectors, locations, infrastructure deliverability and consequential impact on phasing.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

The council should provide evidence to support the phasing strategy. The current document provides no evidence of an analysis of the market sectors, locations, infrastructure deliverability and consequential impact on phasing

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Second Submission

Q14b. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

5.2.2

Policy (if relevant):

SP2 Sustainable Development

Q15b. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE4 - It is reasonably flexible to enable it to deal with changing circumstances

Q16b. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Evidence should be provided to justify the "orderly and consistent development of land to deliver the councils social and economic priorities". No evidence is provided as to the rate of release of land in terms of time and numbers of homes and how this is effected by infrastructure provision. Further no evidence is given on how release of land reflects the demand for homes

Q17b. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

Evidence should be provided to justify the "orderly and consistent development of land to deliver the councils social and economic priorities". No evidence is provided as to the rate of release of land in terms of time and numbers of homes and how this is effected by infrastructure provision. Further no evidence is given on how release of land reflects the demand for homes

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Q18b. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Third Submission

Q14c. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

7.1.7

Policy (if relevant):

HOU1 Accommodating New Homes

Q15c. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base, CE4 - It is reasonably flexible to enable it to deal with changing circumstances

Q16c. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Clause currently treats all land as the same and takes no account of the market demands in specific areas

Q17c. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

Clause currently treats all land as the same and takes no account of the market demands in specific areas

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Q18c. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fourth Submission

Q14d. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

7.1.9

Policy (if relevant):

HOU1 Accommodating New Homes

Q15d. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16d. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

There needs to be a justification for the housing delivery sequence as detailed in table 7.2 and the allocation of numbers

Q17d. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

There needs to be a justification for the housing delivery sequence as detailed in table 7.2 and the allocation of numbers

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Q18d. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fifth Submission

Q14e. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

7.1.10

Policy (if relevant):

HOU1 Accommodating New Homes

Q15e. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base,
CE3 - There are clear mechanisms for implementation and monitoring

Q16e. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Detail is required on how the "plan, monitor and manage approach" is to be achieved and the relevant timetables for achieving same.

This policy should also take cognisance of the delivery of infrastructure and should quantify the costs and timeframes of delivery in order to provide greater detail on the delivery of land for development and the outflow of home delivery.

Policy also needs to recognise the development lands currently undeveloped and planned for that is within travelling distance to Belfast

Q17e. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

Detail is required on how the "plan, monitor and manage approach" is to be achieved and the relevant timetables for achieving same.

This policy should also take cognisance of the delivery of infrastructure and should quantify the costs and timeframes of delivery in order to provide greater detail on the delivery of land for development and the outflow of home delivery.

Policy also needs to recognise the development lands currently undeveloped and planned for that is within travelling distance to Belfast

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No file was uploaded

Q18e. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Sixth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

7.1.12

Policy (if relevant):

HOU2 Windfall Housing

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

This clause should not ignore the policy of not using the oversupply of employment brownfield land for housing or other uses.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

This clause should not ignore the policy of not using the oversupply of employment brownfield land for housing or other uses.

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Seventh Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

7.1.18

Policy (if relevant):

HOU4 Density of Residential Development

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

This clause should be adjusted to cater for mixed use developments. This clause conflicts with clause 7.1.21 and the conflict should be removed or addressed.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

This clause should be adjusted to cater for mixed use developments. This clause conflicts with clause 7.1.21 and the conflict should be removed or addressed.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

No file was uploaded

Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Eighth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

7.1.20

Policy (if relevant):

HOU4 Density of Residential Development

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

The document should present its justification for density and define town cramming with reference to density.
Policy should analyse the identified sites and the type/mix of homes to be provided.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

The document should present its justification for density and define town cramming with reference to density.
Policy should analyse the identified sites and the type/mix of homes to be provided.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

No file was uploaded

Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Ninth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

7.1.22

Policy (if relevant):

HOU4 Density of Residential Development

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

This clause should be adapted to enable the densification of housing along the city corridors rather than restricting it to current densities

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

This clause should be adapted to enable the densification of housing along the city corridors rather than restricting it to current densities

Files should be no more than 10MB and in either PDF or Microsoft Word format:

No file was uploaded

Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Tenth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

7.1.23

Policy (if relevant):

HOU4 Density of Residential Development

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

As per comment on 7.1.22 this clause requires modification so that increases in density are achievable to meet projected demand. To complement this the clause should make reference to modifying parking standards to permit the achievement of quality higher densities. The policy should also facilitate the relaxation of garden sizes to allow the achievement of quality higher densities.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

As per comment on 7.1.22 this clause requires modification so that increases in density are achievable to meet projected demand. To complement this the clause should make reference to modifying parking standards to permit the achievement of quality higher densities. The policy should also facilitate the relaxation of garden sizes to allow the achievement of quality higher densities.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

Submission to BCC draft LDP.pdf was uploaded

9. Type of Procedure

Q18. Please indicate if you would like your representation to be dealt with by:

Written representations

HOU4 - Density of residential development	Modification	7.1.24	CE3	The policy should implement a clear mechanism to monitor and take corrective action if infrastructure is not provided.
HOU4 - Density of residential development	Modification	7.1.25	CE2	Evidence needs to be provided as to why social/affordable provision should be by section 76 agreements and not planning conditions
HOU5 - Affordable Housing	Modification	7.1.26	CE2	<p>This clause needs to provide details to confirm that it is founded on a clear evidence base.</p> <p>This clause also needs to reflect on the evidence from both London and Dublin that indicates high levels of social provision on private schemes reduces the delivery of both social and private homes.</p> <p>The clause should not use terms like "minimum" as it will take certainty for developers to help the council satisfy its ambitious plans. A precise number or "maximum" should be incorporated.</p> <p>No evidence is provided as to why a minimum of 20% is correct. No evidence of how viability is assessed is provided. Who assesses it and how is it challenged. What timeframes will council work to?</p> <p>Evidence also needs to be provided on the assessment of social/affordable numbers for site, when that assessment is made and how it is challenged and timeframe.</p> <p>All of these need to be justified and stated for site in the area plan.</p>

HOU5 - Affordable Housing	Modification	7.1.26	CE2/CE3	<p>Social/affordable provision needs to be clearly stated per site in the area plan to allow associated costs to be planned for by developers. The same applies for infrastructure.</p> <p>There policy should introduce clear mechanisms for monitoring information or challenging the numbers</p> <p>What is the review methodology</p>
HOU5 - Affordable Housing	Modification	7.1.27	CE2	<p>No allowance is made for areas where there is no social affordable need.</p> <p>No evidence is given as to how the minimum number of units is ascertained</p> <p>No evidence of the viability assessment and economic or market impact</p> <p>All of the above should be addressed in the plan</p>
HOU5 - Affordable Housing	Modification	7.1.34	CE1/CE2/CE3	<p>This clause needs to specify that evidence will be provided that looks at both the economic impact and the deliverability of the homes impacted by this clause.</p> <p>The document should include evidence of how the need is to allocated to a particular site. A maximum percentage of units on any site needs to be agreed and the requested percentage in individual cases backed up by agreed viability</p>
HOU5 - Affordable Housing	Modification	7.1.37	CE2	<p>Detail should be provided as to how viability is assessed and its economic impact and what adjustments are made to reflect this</p> <p>No evidence is given as to how the suggested alternatives when affordable/social is unviable are to be achieved. Further no evidence or detail is given on the assessment of viability.</p> <p>All of the above should be addressed in the document</p>

HOU5 - Affordable Housing	Modification	7.1.39	CE2	<p>The assessment of viability should be defined before the plan is issued. Who carries it out, how it is reviewed, how it is challenged should be addressed</p> <p>There needs to be wide consultation with the industry.</p>
HOU6 - Housing mix	Modification	7.1.40	CE2	<p>SPPS - There is no evidence provided for the allocation of different house types on individual sites. It is not specified when this mix of house types is allocated to particular sites, who allocates, and how it is challenged. The document should address these issues.</p> <p>Evidence should be provided to demonstrate how the implementation of HOU6 effects the financial risk of development and the resultant economic impact on developers and the regional economy</p>
HOU6 - Housing mix	Modification	7.1.41	CE2	<p>There should be clarity about who decides the assesses the design need for a site, how they make those decisions and on what basis.</p> <p>It should be clear that there is a right of challenge to the assessment.</p> <p>Evidence should be provided to justify why the private market need is to be displaced.</p>

HOU6 - Housing mix	Modification	7.1.42	CE2	<p>Details of the consideration to be given to the economic impact of increasing the mix of apartment types in a development should be given. There will be significant increases in the structural and infrastructure costs associated with many home types.</p> <p>Detail should be provided as to how viability is assessed and its economic impact and what adjustments are made to reflect this</p> <p>No detail or evidence is given as to how this policy applies to sites that are already purchased with or without planning or are partially developed</p>
HOU6 - Housing mix	Modification	7.1.43	CE2	<p>Housing market analysis needs to be updated on a defined timeframe. Social/affordable requirement needs to be defined for sites prior to the issuance of the plan</p>
HOU6 - Housing mix	Modification	7.1.44	CE2	<p>This clause needs to take account of the market demands and consequential impact on deliverability</p> <p>Evidence should be provided as to how this need is arrived at. No attempt appears to have been made to analyse the private housing market currently and in the case of the council achieving its goals of additional homes in the city</p>

HOU6 - Housing mix	Modification	7.1.45	CE2	<p>The policy needs to demonstrate how the market need is analysed. The social/affordable provision should be clearly stated and justified within the plan. No timeframe is given as to how, when and what evidence basis "local adjustments" are made and agreed.</p> <p>The policy should be amended to provide additional clarity and transparency.</p> <p>Evidence of a timeframe, the basis on which the assessment is carried out, the economic impact, the viability and how it can be challenged should be included</p>
HOU7 - Adaptable and accessible accommodation	Modification sought		CE2	<p>The policy document should provide evidence for the policy. An economic impact assessment should be offered.</p> <p>The policy should include detail on how the different house types are provided in the market and why the policy assumes that it is necessary for someone to stay in one house all of their life.</p>
HOU7 - Adaptable and accessible accommodation	Modification	7.1.46	CE2	<p>The policy should recognise the wide spread of house types within an area in its assessment and not simply a one fit does all overarching policy. Developers cater for the house types that are in demand within the market and purchasers deserve homes that are built for their requirements in the most economic way. There needs to be an analysis of the economic impact of this policy.</p> <p>This clause should include evidence of an analysis of "the significant impact on the design"</p>
HOU7 - Adaptable and accessible accommodation	Modification	7.1.47	CE2	<p>Evidence of the design impact of this policy should be provided. It appears to be based on the assumption that land is flat and infinitely available</p>

HOU7 - Adaptable and accessible accommodation	Modificatio	7.1.48	CE2	<p>There should be an economic impact assessment and justification included together with a justification as to why it is reasonable to burden purchasers with these additional costs.</p> <p>No evidence of an analysis of why regulations have not been accepted into the regulations and the economic and demand impact of doing so.</p>
HOU7 - Adaptable and accessible accommodation	Modificatio	7.1.49	CE2	<p>There should be an economic impact assessment and justification included together with a justification as to why it is reasonable to burden purchasers with these additional costs.</p> <p>No evidence to justify why it is necessary for everyone to have "accessible and adaptable" homes.</p> <p>No evidence is given to justify the housing association stance of incorporating "lifetime homes standards and a series of additional requirements". No attempt is made to detail or justify the series of additional requirements.</p> <p>All of the above should be evidenced within the plan</p>
HOU7 - Adaptable and accessible accommodation	Modificatio	7.1.50	CE2	<p>There should be an economic impact assessment and justification included together with a justification as to why it is reasonable to burden purchasers with these additional costs.</p> <p>Evidence should be provided to demonstrate that the aim of flexible homes for everyone is wanted by the private and social/affordable purchasers. A large percentage of house purchasers do not intend staying in the same home during their lifetime.</p> <p>There is an equally valid argument that market demand will drive design change when it is necessary</p>

HOU7 - Adaptable and accessible accommo dation	Modificatio	7.1.51	CE2	Evidence should be provided to demonstrate why wheelchair accessible homes has been selected as a category that needs to be provided for. Evidence should also be given as to why it is justifiable to charge people who do not want this facility for it. Evidence of the market impact in terms of demand and economic outflow should be provided.
HOU7 - Adaptable and accessible accommo dation	Modificatio	7.1.52	CE2	To provide clarity the following should be detailed; Details of how the assessment is to be made On what basis on what timeframe Any rights of appeal that developers will have. The plan should provide evidence of research into determining if, across the total housing market, that this design outcome is required and if purchasers are prepared to pay for it.
HOU8 - Specialist residential accommo dation	Modificatio	7.1.53	CE2	No evidence is given as to why private specialist residential accommodation which may draw from an area wider than the defined local community is not catered for. The plan should consider including this evidence
HOU8 - Specialist residential accommo dation	Modificatio	7.1.54	CE2	Evidence should be provided for the population assessments used and if those assessments take into consideration the increase in population over the plan period
HOU11 - Intensive housing nodes	Modificatio	7.1.71	CE2	Evidence should be provided for the following; -To detail what town cramming is - To detail how housing demand/need is assessed - Identification of who does it, on what basis and how it can be challenged

HOU11 - Intensive housing nodes	Modification	7.1.73	CE2	Evidence should be provided for geographic dispersal and the impact that this has on the demand for the homes and therefore its deliverability
DES1 - Principles of urban design	Modification	7.2.2	CE2	Evidence should be provided to justify "growth needs to be managed appropriately to ensure that it occurs in the most suitable locations" Evidence should also be provided as to how this management is to be achieved, by whom, what time frame and what is the economic impact. Further evidence demonstrating how the management is going to defeat market demand
DES1 - Principles of urban design	Modification	7.2.8	CE2	This clause needs to address sites that have a wider significance to the city as well as being part of a local area
DES1 - Principles of urban design	Modification	7.2.12	CE2	This policy should be adapted to enable the removal of trees that do not have a Tree Preservation Order. The current wording will greatly hinder the development of sites
DES1 - Principles of urban design	Modification	7.2.15	CE2	The economic impact of this clause should be tested and clarified. Providing connections to the grid on its own can be prohibitive. The clause should also be explicit that it will not be enforced in situations where NIE are unable/refuse to take microgeneration into the grid.

DES1 - Principles of urban design	Modification	7.2.16	CE2	There is no evidence base provided for the imposition of the BREEAM standards or the economic impact of doing so. There is no evidence to suggest that any effort has been made to quantify the total additional costs of all the various clauses on housing and its impact on deliverability. Clarity on these issues should be addressed within the document
DES1 - Principles of urban design	Modification	7.2.18	CE2	This clause conflicts with the need for diversification which is promoted elsewhere in the document
DES1 - Principles of urban design	Modification	7.2.19	CE2	The plan should acknowledge that it will take the quality of public transport to a development site into consideration when considering parking requirements Onerous car parking requirements results in the over provision of car parking in city developements, causing poor design. This is especially true where good public transport is available, These regulations prevent the achievement of densification.
DES2 - Master planning approach for major development	Modification	Policy J	CE2	The retention of existing trees where they have not be covered by a tree preservation order will constrict design and construction. Trees that need to be removed should be replaced by similar tree types
DES2 - Master planning approach for major development	Modification	7.2.23	CE2	Evidence should be provided on the necessity of applying the BREEAM regulations and economic impact of doing so. Further major applications has not been defined and if this applies to residential and or commercial developments

RD3 - Conversion or subdivision of existing buildings for residential use	Modification	7.3.3	CE2	This provision does not recognise that development in the past was not always good or in the correct place. Design following good urban design policy should be approved rather than blindly following "local context". This clause should open space for inclusion of good urban design.
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