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Thursday 15<sup>th</sup> November 2018

Dear Sir/Madam,

**RE: UAH Response to Belfast City Council Draft Local Development Plan**

Ulster Architectural Heritage welcomes the opportunity to respond to Belfast City Council Draft Local Development Plan. This follows on from the UAH submission to BCC on the preceding Preferred Options Paper on 28<sup>th</sup> April 2017. We will not reiterate the sentiments of this previous submission but ask that these are considered once again by Belfast City Council, alongside this response.

UAH is very concerned that Belfast City Council is allowing separate development plans to proceed, in advance of and in apparent independence from this LDP. For instance, we refer to the recently developed 'Inner North West' plan. These development plans are being produced for Belfast City Council. Their lack of reference to the LDP, or indeed existing planning policy has been regarded by UAH to be alarming. How will the LDP and these other development plans coordinate? How has the potential for conflicting policy and guidance been addressed by Belfast City Council Planning Department?

The strength, or indeed weakness, of a local development plan may be assessed by two things. The individual initiatives that it puts forward, and the way in which the exact policy to support these plans is explained. The latter being of equal, if not more importance and is of particular relevance, when considering the quality and the practical future effectiveness of a local development plan. What happens in reality, the future of our historic buildings, streets and cities is dictated by how exacting and robust an LDP is in its detail. Down to the last word. With this in mind, UAH has the following concerns:

Belfast City Council has the option to adopt the Planning Policy Statement 6 (PPS6) in its entirety in the LDP. Principles for the protection of built heritage that have been established since 1999. Policy that is robust in itself, when it is applied in full.

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It appears that contrary to UAH advice BCC has proceeded with an option may be seen to both degrade and cut across the existing PPS6. UAH notes that some diversions from PPS6 have been made, diversions that we believe have the serious potential weaken to the protection of Belfast's important heritage assets.

We argue that PPS6 and the SPPS, and their associated supplementary guidance are sufficient resource upon which to base planning decisions for the historic environment. We reiterate that these need to be adopted by Belfast City Council, **in full**.

Significant, but not exhaustive list of diversion from PPS6 is as follows:

- 1) Page 112-30, section 7.4, Built Heritage, policy BH1-5, reduces the number of policies relating to archaeology and the built heritage, removing general criteria and weakening the policy. Policies appear changed, and at points unnecessarily 'streamlined'. Amplification and justification for each policy has been moved to the end of each BH, making it difficult to link the policy to the important justification;
- 2) with regard to the policy set out in the BH 1-5, to lead with '*permission will be granted*' on any condition of planning may suggest weighting towards approval, before the policy is even detailed. The introduction should be as per PPS 6, with '***Belfast City Council will normally only grant consent to proposals for XXX where all the following criteria are met:***';
- 3) 'New development affecting the setting of listed buildings' is at the top of the list within proposed BH1. The built heritage asset is the priority in this planning policy and, as per PPS6, the proper treatment of historic buildings, and not new development, should come first in order of priority;
- 4) we note the criteria in BH1 asks that the '*proposal makes use of quality materials and appropriate detailing sympathetic with the existing building and/or setting*' removing the PPS emphasis for traditional building materials and techniques. This should be as per PPS6, '***the works proposed make use of traditional and/or sympathetic building materials and techniques which match or are in keeping with those found on the building***';
- 5) Page 93, section 7.2.9, with regard to control of advertisements and quality of shopfronts, this section refers to '*listed buildings and areas of built heritage*', this should be changed to '***listed buildings and areas of built heritage, including conservation areas and areas of townscape character***'.

In addition, it is most alarming to see a local authority base performance indicators on relative levels of failure rather than relative levels of success.

UAH notes page 324, **Indicator 14**, that the Heritage at Risk Register, and that the 'number of buildings at risk' is used as an indicator. Particularly, '*less than 10 % of listed buildings at risk removed from BHARNI Register due to demolition over 5 year period*'. UAH has not directly been contacted for heritage at risk statistics by Belfast City Council. We are unaware of what 5 year period to which this refers.

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Listed buildings, by definition should be protected from demolition if BCC acts on listed building consent and issues of, for example ownership, land banking, maintenance, and enforcement. Unfortunately, demolition is relevant, statistically, normally to chart failure and not progress in the protection of the historic built environment.

The usual and more appropriate target to use as an indicator for Heritage at Risk is in fact the number of buildings removed from the register by way of reuse and regeneration, not the number that are demolished. We regard this to be an inappropriate indicator, and firmly request that it is changed.

Also with regard to indicators, we note in **Indicator 15**, conservations areas, that the ‘loss of geographic area designated’ is referred to. We are not aware of any proposed ‘geographic loss’ to conservation areas.

Conservation areas, by definition, should be protected from demolition or loss by degradation, if BCC acts in a timely and appropriately on issues of enforcement and conservation area consent. BCC should again be monitoring reuse and regeneration, together with falling numbers of vacancy in conservation areas should be used as the indicator for Conservation Areas and Areas of Townscape Character. Where there has been loss of character to a conservation area or area of townscape character, BCC should be encouraging heritage led regeneration to reverse this effect, rather than writing off responsibility by reducing the geographic area of conservation areas and ATCs.

**The emphasis of these indicators towards relative levels of failure, rather than relative levels of success, sets the bar for built heritage at a very low level in this LDP.**

With regard to **Indicator 16**, we support the target to lower the numbers of demolitions in conservation areas and areas of townscape character allowed at appeal.

With regard to **Indicator 17**, ‘a reduction in enforcement cases against tree removal in conservation areas’ may not necessarily imply the reduction in unauthorised tree felling. This target should be changed to ‘a reduction of unauthorised tree felling’.

With regard to **Policy DES3, Tall Buildings**, we regard the proposed policy to fall far short of adequate for tall buildings planning for Belfast. The proposal that tall buildings should be ‘*sited in locations within the street pattern that terminate or accentuate key vistas and where they place emphasis on areas of civic or visual importance*’ does not refer to design quality, massing or true contextual consideration, and has real potential to conflict with principles for the protection of our built heritage asset and the character of our streets and city.

This policy statement pre supposes that tall buildings will enhance our streets and city. In reality the tall buildings built and proposed in Belfast to date lack inclination towards physical enhancement in terms of design quality and sensitivity to their surroundings and character context. The reuse of more existing, smaller scale buildings by a larger number of developers, would better spread the physical (and economic benefit) and is far more likely to give benefit of enhancement to our streets, and our city.

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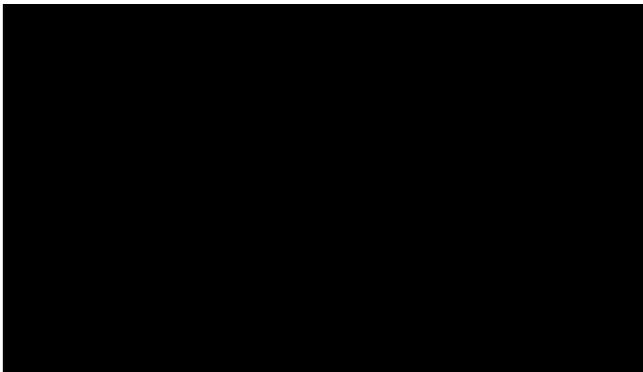
For conservation areas and areas of townscape character, tall buildings should not be permitted, and a sympathetic and appropriate height restriction for these areas should be clearly stated in the LDP.

We reiterate our view that with the clearance of the Queen's Island lands for Titanic Quarter, and the vacancy levels still remaining after many years, there is actually an argument to be made that there is no need for tall buildings in Belfast City core at all, and that the short walk or cycle ride from a TQ tall building business district to the 'historic' City would deliver what a more enlightened plan should have aspired towards in the first place.

To reiterate, the historic built environment does not simply represent Belfast's important past, it is the foundation for its future. Without proper management of heritage through the Local Development Plan, more of Belfast's irreplaceable heritage value will be lost. Most strikingly, this draft is seen to diminish the existing policy PPS6, for the protection of built heritage and goes as far as to prioritise relative indication of failure, rather than success, as central to the monitoring of built heritage in the plan.

**In summary, this plan proposes a framework that may be set to fail our important heritage assets and their potential value for the next 15 years. Ulster Architectural Heritage asks for significant changes are made to this draft Local Development Plan in response to the above concerns raised.**

Yours sincerely,



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