

Belfast LDP 2035 - Plan Strategy

Overview

We're developing the new Local Development Plan (LDP) which is the land use plan for Belfast up to 2035. The Plan will guide investment and set out policies and proposals for the use, development and protection of land across the city. Once adopted the plan will be used to determine planning applications. It will take approximately four years to develop and formally adopt the new LDP.

A series of consultation stages are built into the process for creating the LDP and are defined by legislation to help local people input into this Plan. We are currently undertaking the second stage of the consultation process in relation to the draft Plan Strategy.

Your opinions matter to us and we want to hear from you during the various stages throughout the preparation of the plan. While you can provide feedback using this form, we encourage you to use our online questionnaire via the Council's Consultation Hub at:

<https://yoursay.belfastcity.gov.uk/>. The consultation closes on 15th November 2018.

What is the LDP?

The LDP:

- Guides development
- Provides certainty and a framework for investment
- Facilitates sustainable growth
- Puts communities at the heart of the process
- Allows for speedier decision making under the new plan-led system

How will this impact on me?

Our LDP will have an impact on everyone who lives, works and visits Belfast because it will shape how the city will develop in the future. Your views are important so we'd like you to get involved in its preparation.

What is the Plan Strategy?

The Plan Strategy will be a strategic policy framework for the plan area as a whole across a range of topics. It will set out an ambitious but realistic vision for Belfast as well as the objectives and strategic policies required to deliver that vision. Establishing this strategic direction early in the plan process will provide a level of certainty on which to base key development decisions in the area as

well as the necessary framework for the preparation of the Local Policies Plan. You can find out more about the Plan Strategy, and access all relevant documents, on the Council's website at:

www.belfastcity.gov.uk/LDP.

Accessibility

The relevant documents are available, on request, in alternative formats - Braille, audio, large print, easy read. The council will also consider requests to produce it in other languages. If you require the documents in these or other formats please contact us:

Belfast Planning Service
Belfast City Council
Cecil Ward Building
4-10 Linenhall Street Belfast
BT2 8BP

Telephone: 028 9050 0510

Email: [**localdevelopmentplan@belfastcity.gov.uk**](mailto:localdevelopmentplan@belfastcity.gov.uk)

A. Data Protection

Belfast City Council is the Data Controller under the General Data Protection Regulation (GDPR) for the personal data it gathers for the purposes of sending regular email updates on the Local Development Plan from Belfast Planning Service.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the independent examination process.

The council accepts that you are providing your personal data on the basis of consent and are positively agreeing for the council to hold and further use it, publish it (without personal information such as name and email, but will include organisation). Belfast City Council must also share it with the Department for Infrastructure and whoever they appoint to undertake the independent examination.

Any personal details that you provide the Council will be handled in accordance with the GDPR and Data Protection Act 2018. As such we will only use your data for the purposes that you have given this information for and will only be shared where necessary to provide the service that you are contacting us about. If you would like further information in regards please see the website belfastcity.gov.uk/about/privacy

The personal data is held and stored by the council in a safe and secure manner and in compliance with Data Protection legislation and in line with the council's Records Retention and Disposal Schedule.

If you wish to contact the council's Data Protection Officer, please write to:

Belfast City Council,
City Hall Belfast,
BT1 5GS

or send an email to **records@belfastcity.gov.uk**

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

(Required)

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?

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Even if you opt for your comments to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the inspectorate they appoint to oversee the examination in public into the soundness of our plan. This will be done in accordance with the privacy statement above.

(Required)

Please select only one item

Yes, with my name and/or organisation

Yes, but without my identifying information

B. 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?

(Required)

Please select only one item

- Individual *(Fill in the remaining questions in this Section, then proceed to Section C)*
- Organisation *(Fill in the remaining questions in this Section, then proceed to Section D)*
- I'm an Agent *(Fill in the remaining questions in this Section, then proceed to Section E)*

Q4. What is your name?

Title

Mrs

First Name (Required)

Beverley

Last Name (Required)

Clyde

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?

(Required)

Please select only one item

- Yes No Unsure

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

N/A

C. Individuals

If you are responding as an individual, please complete this Section, then proceed to Section E

Q8. What is your address?

Address Line 1 (Required)

Line 2

Line 3

City (Required)

Postcode (Required)

D. Organisation

If you have selected that you are responding as an organisational respondent, there are a number of pieces of information that we are legally required to gather from you.

Q9. If you are responding as a representative of a group or organisation, please complete this Section, then proceed to Section E.

Organisation (Required)

The National Trust (Northern Ireland)

Your Job Title (Required)

Planning Adviser (Northern Ireland)

Organisation address (if different from above):

Address Line 1 (Required)

Rowallane Hub

Line 2

Saintfied

Line 3

City

Ballynahinch

Postcode (Required)

BT24 7LH

E. Agents

If you have selected that you are responding as an agent on behalf of other people/organisations, there are a number of pieces of information that we are legally required to gather from you.

Q10. Please provide details of the organisation or individual you are representing:

The name of the organisation or individual you are representing: (Required)

Client contact details:

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

Line 2

Line 3

City

Postcode (Required)

Telephone number (Required)

Email address (Required)

Q11. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

(Required)

Please select only one item

Agent Client Both

F. 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?

(Required)

Please select only one item

- I believe it to be sound *(Proceed to Section G)*
- I believe it to be unsound *(Proceed to Section H)*

G. Sound

Q13. If you consider the Plan Strategy to be sound and wish to support the Plan Strategy, please set out your comments below, then proceed to Section I:

(Required)

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

H. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Refer to Separate Attachment

Policy (if relevant)

Refer to Separate Attachment

Q15. 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, available at: <https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required) Refer to Separate Attachment

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 - Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- C1 - Did the council take account of the Regional Development Strategy?

- C2 - Did the council take account of its Community Plan?
- C3 - Did the council take account of policy and guidance issued by the Department?
- 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?
- 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
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 - It is reasonably flexible to enable it to deal with changing circumstances

Q16. 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.

Refer to Separate Attachment

Q17. 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.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Refer to Separate Attachment

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

I. Type of Procedure

Q19. Please indicate if you would like your representation to be dealt with by:
(Required)

Please select only one item Refer to Separate Attachment

- Written representations (Choose this procedure to have your representation considered in written form only.)
- Oral hearing (Choose this procedure to present your representation orally at the public hearing event(s))

Unless you specifically request a hearing, an independent examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note however that an independent examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.



National
Trust

BELFAST CITY COUNCIL

DRAFT PLAN STRATEGY RESPONSE

This submission is prepared by the National Trust for Northern Ireland (NI). We are an independent conservation charity actively promoting the protection of natural, built and cultural heritage - for ever, for everyone.

We look after some of the most valued landscapes, stretches of coastline and built heritage in Northern Ireland, Wales and England. In NI, this includes our only World Heritage Site (WHS) at the Giant's Causeway; our highest mountain, Slieve Donard; the internationally important and beautiful Strangford Lough, and houses and gardens including Mount Stewart and Rowallane in Co. Down, the Belfast Hills of Divis and Black Mountain and Florence Court and Castle Coole in Co. Fermanagh.

We do this because places matter to people; our charity was first set up in order to ensure society didn't lose its much needed green open spaces in which to spend time and benefit from the outdoors, and that mission remains core to our work today.

We have a significant interest in the natural environment and built heritage within Belfast City Council area, owning and managing some very special places including:

- Colin Glen
- Divis and Black Mountain
- The Crown Bar
- Belmont Tower
- Minnowburn
- Lisnabrenny

Access to green spaces has been documented in recent years as being a significant factor in public health and wellbeing, and we believe the new local development plan alongside the community plan have an important role to play in this regard.

Please see our comments below regarding the Draft Plan Strategy in terms of the policies that we consider to be unsound. The second section lists the policies we support and consider to be sound. Where we are silent on a particular policy, we have no comments to make.

Policy SP2 - Sustainable Development

Response:	<p>Whilst the presumption in favour of sustainable development accords with the SPPS, this draft policy fails to specify that this is subject to the demonstrable harm test and the precautionary principle.</p> <p>We therefore request that the policy is amended to reflect the exact wording of paragraph 5.72 of the Strategic Planning Policy Statement (SPPS) to make it more effective and consistent, that is:</p> <p>“Sustainable development should be permitted, having regard to the local development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance. In such cases, planning permission should be refused.”</p> <p>The plan is therefore unsound because the Council has not fully taken account of the SPPS with regard to this policy (Effectiveness and Consistency Tests).</p>
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Policy HOU13 - Short-Term Let Accommodation

Response:	<p>We support the general ethos of this policy in siting short-term lets within a tourism cluster or in close proximity to a visitor attraction.</p> <p>However the policy could be more effective if ‘close proximity’ was defined. Furthermore, we have no issue with part of the property being in permanent residential use for large properties, but this may not be a viable option or physically achievable in small properties. Consideration should be given to this in making the plan effective.</p>
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Policy DES3 - Tall Buildings

Response:	<p>Welcome policy criteria for tall buildings particularly with regards to their relationship with listed buildings (e.g. the Crown), Conservation Areas, Areas of Townscape Character (ATCs) and historic monuments/gardens.</p>
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	<p>Respecting key public views and vistas is also supported. However, to reflect the SPPS, the policy should be strengthened to ensure that the impact of such tall proposals on the settings of our built heritage assets are also assessed. Where such development has an adverse effect on the settings of heritage assets, they should be refused. This approach would make the plan more effective in protecting and enhancing our heritage assets consistent with government advice.</p> <p>We support directing tall buildings to existing established clusters or to accentuate key vistas or emphasise areas of civic or visual importance. But only limited areas should be identified in the Local Policies Plan in order to preserve Belfast's attractive unique feature as a low lying city.</p> <p>This policy is not effective and is inconsistent with the SPPS; therefore the plan is unsound.</p>
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Policy BH1 - Listed Buildings

Policy BH2 - Conservation Areas

Policy BH3 - Areas of Townscape Character

Response:	<p>We support the protection and enhancement of listed buildings, conservation areas and ATC's and their settings.</p> <p>The SPPS refers to development proposals in Conservation Areas having to 'conform' with Conservation Area Design Guides whereas 'regard' to guides is applied in the plan.</p> <p>The plan policy should take into account the SPPS and use the word 'conform' to give the design guides stronger weight in the decision-making process.</p> <p>These policies are inconsistent with the SPPS. Hence, the plan is unsound.</p>
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Policy BH6 - Historic Parks, Gardens and Demesnes

Response:	<p>Paragraph 6.16 of the SPPS explicitly states that planning permission should not be granted for development that would lead to the loss of, or cause harm to, the overall character, principal components or setting of Historic Parks, Gardens and Demesnes.</p> <p>However, the plan policy only goes as far to state that particular attention will be given to certain aspects.</p> <p>The local plan's policy BH6 should be strengthened to reflect the presumption against development as per government advice. In addition, the policy should protect the integrity of historic parks, gardens and demesnes in accordance with paragraph 6.17 of the SPPS.</p> <p>Policy BH6 does not take account of the SPPS therefore it is inconsistent and ineffective in protecting Historic Parks, Gardens and Demesnes. In this regard, the plan is unsound.</p>
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Policy TLC1 -Supporting Tourism, Leisure and Cultural Development

Response:	<p>We support Policy TLC1 but the plan should also provide policies to safeguard tourism assets from inappropriate development in accordance with paragraph 6.264 of the SPPS.</p> <p>The omission of policy to protect tourism assets is inconsistent with the Department's advice. The plan is therefore unsound. Refer also to response to Policy TLC2.</p>
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Policy TLC2 - Existing Tourism Leisure and Cultural Facilities and Assets

Response:	<p>We fully support the retention of existing tourism, leisure and cultural facilities unless there is no longer a viable need or replacement provided elsewhere etc. but we are concerned that assets is merely an add on to this policy.</p>
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	<p>The draft plan does not robustly safeguard built and natural tourism assets.</p> <p>Paragraph 6.262 of the SPPS states that there are many diverse features of the built and natural heritage that can be regarded as tourism assets.</p> <p>The Department’s advice is that a tourism asset can be regarded as any feature associated with the built or natural environment which is of intrinsic interest to tourists.</p> <p>The SPPS also states that the safeguarding of such tourism assets from unnecessary, inappropriate or excessive development is a vital element in maintaining a healthy tourism industry. To allow such development could damage the intrinsic character and quality of the asset and diminish its effectiveness in attracting tourist.</p> <p>In accordance with paragraph 6.2.62 of the SPPS, a separate policy should be applied to safeguard tourism assets and a presumption against development applied where development would in itself or in combination with existing and approved development in the locality, have an adverse impact on a tourism asset, such as to significantly compromise its tourism value.</p> <p>The failure to identify and safeguard tourism assets is inconsistent with the Department’s recommendation. The lack of protection for such areas means that the plan is ineffective and unsound.</p>
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Policy TLC3 - Overnight Visitor Accommodation

Response:	<p>We support the general ethos of this policy in siting overnight visitor accommodation either within a tourism cluster or in close proximity to a visitor attraction.</p> <p>However the policy could be more effective if ‘close proximity’ was defined.</p>
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Policy ITU4 - Renewable Energy Development

Response:	<p>Paragraph 6.223 of the SPPS sets a 'cautious approach' to renewable energy development proposals within designated landscapes which are of significant value, such as the Lagan Valley Area of Outstanding Natural Beauty (AONB), and their wider setting. The SPPS continues to state that in such sensitive landscapes, it may be difficult to accommodate renewable energy proposals including wind turbines, without detriment to the region's cultural and natural heritage assets.</p> <p>The SPPS also recognises that the cumulative impacts of development proposals in AONBs will be taken into account alongside the Landscape Character Assessments and other relevant guidance including AONB Management Plans and local design guides. The SPPS also highlights that development proposals must be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife (Paragraphs 6.187 and 6.188 of the SPPS).</p> <p>The policy in the draft plan should be strengthened to make it effective. It also fails to deal with cumulative impacts of renewable energy projects e.g. wind turbines.</p> <p>It would be more robust to set a presumption against renewable energy development within designated landscapes of significant value unless the proposal individually and cumulatively will cause no harm to the character of the landscape. This would be more effective policy in protecting such designated landscapes.</p> <p>Further rigorous policy tests on heritage and landscape considerations should be applied also to wind turbine proposals across the Council area such as:</p> <ul style="list-style-type: none">(i) no unacceptable adverse effects on long and medium range views to and from sensitive landscapes, such as Lagan Valley AONB; and(ii) no unacceptable adverse effects on important recognised outlooks and views from or to heritage assets where these are predominantly unaffected by harmful visual intrusion, taking into account the significance of the heritage
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	<p>asset and its setting.</p> <p>The plan is unsound in effectively protecting sensitive landscapes from renewable energy projects.</p>
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Policy M1 - Minerals

Response:	<p>The SPPS (page 77) states that local plans should identify areas (referred in previous plans as ‘Areas of Constraint on Minerals Development’) which should be protected from minerals development because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage). However, defining such areas is not mentioned in the draft plan strategy. Such areas should be identified in accordance with the SPPS.</p> <p>The plan is therefore incoherent because of this omission. Thus, it is unsound.</p>
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Policy ENV2 – Mitigating Environmental Change

Policy ENV3 – Adapting to Environmental Change

Response:	<p>One of the regional strategic objectives for renewable energy is to facilitate the integration of renewable energy technology into the design, siting and layout of new development and promote greater application of the principles of Passive Solar design (paragraph 6.219 of the SPPS).</p> <p>Whilst the above policy promotes the reuse of buildings and the general use of energy efficient, micro-generating and decentralised renewable energy systems, the words ‘where feasible’ and the lack of reference within the policy headnote that a Statement of Sustainability must be submitted weaken this policy.</p> <p>The policy (ENV2) headnote should be much more robust and state that new developments must submit a Statement of Sustainability demonstrating how the proposal has maximised opportunities to incorporate sustainable design features. This could relate initially to proposals falling within the major category.</p>
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	<p>In brief, Policy ENV2 is ineffective in mitigating environmental change and could be robust should the policy be altered to reflect our suggestion.</p> <p>Furthermore, the plan is silent in relation to identifying areas of the coast known to be at risk from coastal erosion and land instability and setting out policy where new development should not be permitted within such areas as required under the SPPS (paragraph 6.46). This omission results in the plan failing to effectively adapt to environmental change. Policy ENV3 is therefore not effective. As it does not take account of the SPPS in this regard, the plan is unsound.</p>
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Policy ENV5 - Sustainable Drainage Systems

Response:	<p>Paragraph 6.118 of the SPPS highlights that planning authorities should encourage developers to use sustainable drainage systems (SUDs) as the preferred drainage solution.</p> <p>Policy ENV5 could be effective in achieving the above if the policy was worded to make it mandatory for new developments to include SUDS. The wording 'where appropriate' should be removed to strengthen the policy to accord with the SPPS requirements.</p>
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Policy OS4 – New Open Space outside Settlements

Policy OS5 – Intensive Sports Facilities

Response:	<p>Government defines intensive sports facility as a purpose built indoor or outdoor resource which facilitates one or more activity fundamental to maintaining individual health and fitness. This may include stadia, sports, halls, leisure centres, swimming pools and other indoor (and outdoor) sports facilities (page 87 of the SPPS).</p> <p>Paragraph 6.207 of the SPPS directs intensive sports facilities to settlements but as an exception a sports stadium may be allowed outside of a settlement but only</p>
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	<p>where clear criteria is established, which can justify a departure from this approach.</p> <p>The above policies are welcomed but we note that for general sport and outdoor recreation an applicant would have to demonstrate that such proposals cannot be better located on previously developed land whereas for intensive sports facilities this is not a requirement. Suggest that both policies accord with each other.</p>
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Policy NH1 – Protection of Natural Heritage Resources

Response	<p>The degree of effects considered unacceptable on local, national and international sites appears to reflect the SPPS.</p> <p>However, a minor point relates to the sentence in the second paragraph of the policy headnote ‘new development will not have an unacceptable effect’. It is slightly ambiguous as it could be interpreted that if the new development has an effect at all then it’s unacceptable which is at odds with the rest of the policy and the SPPS.</p>
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Policy LC1D – Landscape Wedges

Response:	It is recommended that the word ‘normally’ is removed to make the policy robust.
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Policy LC4 – Coastal Area

Response:	Whilst the coastal policy is robust, reference should be made to the implementation of shoreline management plans at the Local Policies Plan Stage.
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Habitats Regulation Assessment

Response:	<p>While we acknowledge that the Habitats Regulations Assessment (HRA) of the Draft Plan Strategy is at a strategic-level, there is however, a significant reliance placed on avoiding adverse effects at the Local Polices Plan (LLP) project-level via project-specific HRAs, and on an assumption that adverse effects can be avoided by mitigation considered and implemented at the LPP/project-level.</p> <p>Such an approach leads to an inevitable requirement for project-level mitigation measures to be an absolute condition of any planning permissions granted by Belfast City Council under its Local Development Plan. It also passes the risk to the developer as to whether mitigation measures will be able to avoid an adverse effect on integrity at the project level, undermining the value of strategic HRA.</p> <p>Mitigation measures, necessary to avoid an adverse effect on European sites, need to be set out (at a high/generic level) in greater detail in Plan Strategy HRA, and it should be clearly stated that these measures must be included at the LPP/project stage for the conclusion of no adverse effects to be reached at this stage. In addition, it is important that mitigation measures are available in time, on site and are effective.</p> <p>Assessment assumptions and Limitations (page 5)</p> <p>The draft HRA is centred on the fact that a number of SPPS polices must be taken into account in the determination of planning applications and which specifically apply to International Designations (i.e. paragraphs 6.175 - 6.178). It has been assumed that these polices will apply to the draft Plan Strategy and local plan policies and that they are material to all decisions on individual planning applications. Any deviation from such an assumption in any future iterations of the draft Plan Strategy could undermine the conclusions of the HRA as currently written.</p>
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	<p>Climate Change (page 7)</p> <p>With regards to climate change, the draft HRA states <i>‘the causes of climate change are global and it is not within the scope of the LDP to bring about levels of change such that they will have an evident impact on climate change as it affects European sites. Climate change is therefore not assessed as an impact that the draft Plan Strategy directly contributes to’</i>. However, in order to secure the long-term presence and stability of the Natura 2000 sites and network climate change should be a key consideration in the application of Appropriate Assessment (AA). To this end, it is recommended that during the AA process, consideration should be given to whether the plan does in any way inhibit the potential of species and habitats to adapt to climate change.</p> <p>Combination & Cumulative Effects & Mitigation</p> <p>There is an assumption in the HRA that adverse effects can be avoided by mitigation considered and implemented at the higher plan level. However, there are too many unknowns to warrant the following sweeping statement “the evidence gathered and assessment undertaken enables us to conclude reasonably and objectively that, subject to included and proposed mitigation, the implementation of the draft Plan Strategy will not adversely affect the integrity of...”</p>
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Further Comment

Response:	<p>The Priority Species list in Technical Supplement 7: Natural heritage’ is not the most up-to-date one for Belfast.</p> <p>For example, the list includes Yellow Wagtail, Ashy-Headed Wagtail, and Blue-Headed Wagtail. Yellow wagtail is a priority species while the other two are southern/northern races/sub-species from southern/northern Europe. Corncrake, Golden Eagle and Ring Ouzel should not be on the list for Belfast. On the butterfly front, the list has Wood White, Real's Wood White and Cryptic Wood White; the latter is the correct and only one.</p>
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Setting aside the above concerns, there are certain policies that the National Trust endorses and wishes to highlight its support for which are as follows:

- Policy SP3 - Improving Health & Well-Being
- Policy SP7 - Connectivity
- Policy SP8 - Green and Blue Infrastructure
- Policy BH5 - Archaeology
- Policy EC1 - Delivering Inclusive Economic Growth:
- Policy GB1 -Green and Blue Infrastructure Network
- Policy TRE1 -Trees
- Policy LC1 -Landscape
- Policy LC1A -Areas of Outstanding Natural Beauty
- Policy LC1B - Areas of High Scenic Value
- Policy LC2 - Lagan Valley Regional Park
- Policy LC3 - Belfast Hills

For Policy EC1, any tourism growth must be fully aligned with the principles of sustainable tourism as defined in paragraph 6.254 of the SPPS.

As an important local stakeholder we welcome the opportunity to provide this response to the Belfast Draft Plan Strategy.

We look forward to continued engagement and working with Belfast City Council around modifications to the draft Plan Strategy and if required attendance at the independent public examination.

For further information, please contact:

Beverley Clyde MRTPI
Planning Adviser (Northern Ireland)

████████████████████
The National Trust NI
Rowallane
Saintfield
Ballynahinch
County Down, BT24 7LH
Tel. ██████████