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Telephone [REDACTED]  
VAT REG No 168 1294 90

Local Development Team  
Belfast City Council  
Cecil Ward Building  
4-10 Linenhall Street  
Belfast  
BT2 8BP

15<sup>th</sup> November 2018

Dear Sirs

**Belfast Local Development Plan**

Please find enclosed consultation responses.

Yours sincerely

[REDACTED]

Christopher Bryson /  
[REDACTED]



## 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](http://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](mailto: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

Mr

First Name (Required)

Christopher

Last Name (Required)

Carvill

**Q5.** What is your telephone number?

Telephone number

[REDACTED]

**Q6.** What is your email address?

[REDACTED]

**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:

[REDACTED]

## 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)

CARVILL DEVELOPMENTS LIMITED

Your Job Title (Required)

MANAGING DIRECTOR

**Organisation address (if different from above):**

Address Line 1 (Required)

43 CORBET ROAD

Line 2

BANBRIDGE

Line 3

CO DOWN

City

Postcode (Required)

BT32 3SH

## 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

PLEASE SEE ATTACHED DOCUMENT

Policy (if relevant)

PLEASE SEE ATTACHED DOCUMENT

**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)

*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.

SEE ATTACHED DOCUMENT

**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.

SEE ATTACHED DOCUMENT

**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*

- 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.

# Appendix 1: Response to Preferred Options Paper

**CARVILL DEVELOPMENTS LTD**

Belfast Local Development Plan Consultation Responses		Section	Policy Ref	Position	Belfast LDP reference	Objection Clause	Change Sought
General		Belfast Local Development Plan				P1	A much longer consultation period would be appropriate for a draft plan document of such major significance to Belfast city
4 Vision, Aims and Objectives				No issue			
4.1 The vision							
4.2 Strategic aims and objectives							
5 Strategic Policies							
5.1 Growth strategy		SP1 - Growth Strategy		Modification sought	5.1.4	C4	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
5.2 Sustainable development		SP2 - Sustainable development		Modification sought	5.2.2	C4	Evidence should be provided to justify the "orderly and consistent development of land to deliver the council's 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
5.3 Improving health and well-being		SP3 - Improving health and well-being		No issue			
5.4 Community cohesion and good relations		SP4 - Community cohesion and good relations		No issue			
5.5 Positive placemaking		SP6 - Positive placemaking		No issue			
5.6 Environmental resilience		SP6 - Environmental resilience		No issue			
5.7 Connectivity		SP7 - Connectivity		No issue			
5.8 Green and blue infrastructure		SP8 - Green and blue infrastructure network		No issue			
6 Spatial Development Strategy							
6.1 Settlement hierarchy		SD1 - Settlement hierarchy		No issue			
6.2 Settlement areas		SD2 - Settlement areas		No issue			
6.3 City centre		SD3 - City centre		No issue			
7 Shaping a Liveable Place							
7.1 Housing		Introduction		Modification sought	7.1.3	C4	Clause needs to define and cater for market housing
		Introduction		Modification sought	7.1.5	C4	Clause should acknowledge market demand for different floor plans
		HOU1 - Accommodating new homes		Modification sought	7.1.7	CE2/CE1/ C4	Clause currently treats all land as the same and takes no account of the market demands in specific areas
		HOU1 - Accommodating new homes		Modification sought	7.1.9	CE2	There needs to be a justification for the housing delivery sequence as detailed in table 7.2 and the allocation of numbers
		HOU1 - Accommodating new homes		Modification sought	7.1.10	CE2/CE3	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 which are within travelling distance to Belfast
		HOU2 - Windfall housing		Modification sought	7.1.12	C4	This clause should not ignore the policy of not using the oversupply of employment brownfield land for housing or other uses.
		HOU3 - Protection of existing residential accommodation		No issue			
		HOU4 - Density of residential development		Modification sought	7.1.18	C4/CE2	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.
		HOU4 - Density of residential development		Modification sought	7.1.20	C4/CE2	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.
		HOU4 - Density of residential development		Modification sought	7.1.22	C4/CE2	This clause should be adapted to enable the densification of housing along the city corridors rather than restricting it to current densities

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15 NOV 2018

BELFAST PLANNING  
SERVICE

Section	Policy Ref	Position	Belfast LDP reference	Objection Clause	Change Sought
	HOU4 - Density of residential development	Modification sought	7.1.23	C4/CE2	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.
	HOU4 - Density of residential development	Modification sought	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 sought	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 sought	7.1.26	C2/CE2	This clause needs to provide details to confirm that it is founded on a clear evidence base. 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. 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. 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 times frames will council work to? Evidence also needs to be provided on the assessment of social/affordable numbers for site, when that assessment is made and how it can be challenged and timeframe. All of these need to be justified and stated per site in the area plan. 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. The policy should introduce clear mechanisms for monitoring information or challenging the numbers What is the review methodology Consultation with Construction Employers Federation (CEF)/Focus groups should be undertaken Developers contributions consultation response period should have been aligned with Local Development Plan response period as both are intrinsically linked.
	HOU5 - Affordable Housing	Modification sought	7.1.27	CE2	No allowance is made for areas where there is no social affordable need. No evidence is given as to how the minimum number of units is ascertained No evidence of the viability assessment and economic or market impact All of the above should be addressed in the plan
	HOU5 - Affordable Housing	Modification sought	7.1.34	CE1/CE2/CE3	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. The document should include evidence of how the need is to be 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 Consultation with Construction Employers Federation (CEF)/Focus groups should be undertaken
	HOU5 - Affordable Housing	Modification sought	7.1.36	CE2	This clause ignores the fact that housing associations build to different specifications/regulations and that therefore the houses are different even if pepper potted. Consideration to be given to pepper potting or regulations

Section	Policy Ref	Position	Belfast LDP reference	Objection Clause	Change Sought
	HOU5 - Affordable Housing	Modification sought	7.1.37	CE2	Detail should be provided as to how viability is assessed and its economic impact and what adjustments are made to reflect this 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. All of the above should be addressed in the document
	HOU5 - Affordable Housing	Modification sought	7.1.39	CE2	The assessment of viability should be defined before the plan is issued and should be applied to all sites. Who carries it out, how it is reviewed and how it is challenged all should be addressed There needs to be wide consultation with the industry. Consultation with Construction Employers Federation (CEF)/Focus groups should be undertaken
	HOU6 - Housing mix	Modification sought	7.1.40	CE2	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. 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
	HOU6 - Housing mix	Modification sought	7.1.41	CE2	There should be clarity about who decides and assesses the design need for a site, how they make those decisions and on what basis. It needs to be in area plan for each site It should be clear that there is a right of challenge to the assessment. Evidence should be provided to justify why the private market need is to be displaced
	HOU6 - Housing mix	Modification sought	7.1.42	CE2	This clause should make provision for the impact of "peer pressure" on being the person/family in the affordable homes in certain developments. 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. Detail should be provided as to how viability is assessed and its economic impact and what adjustments are made to reflect this 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
	HOU6 - Housing mix	Modification sought	7.1.43	CE2	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
	HOU6 - Housing mix	Modification sought	7.1.44	CE2	This clause needs to take account of the market demands and consequential impact on deliverability 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
	HOU6 - Housing mix	Modification sought	7.1.45	CE2	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. The policy should be amended to provide additional clarity and transparency. 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
	HOU7 - Adaptable and accessible accommodation	Modification sought		CE2	The policy document should provide evidence for the policy. An economic impact assessment should be offered. 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.



Section	Policy Ref	Position	Belfast LDP reference	Objection Clause	Change Sought
	HOU7 - Adaptable and accessible accommodation	Modification sought	7.1.46	CE2	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. This clause should include evidence of an analysis of 'the significant impact on the design'
	HOU7 - Adaptable and accessible accommodation	Modification sought	7.1.47	CE2	Evidence of the design and cost impact of this policy should be provided. It appears to be based on the assumption that land is flat and infinitely available
	HOU7 - Adaptable and accessible accommodation	Modification sought	7.1.48	CE2	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. No evidence of an analysis of why those standards that have not been included into the regulations were excluded and also the economic and demand impact of including them is provided.
	HOU7 - Adaptable and accessible accommodation	Modification sought	7.1.49	CE2	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. No evidence to justify why it is necessary for everyone to have 'accessible and adaptable' homes. 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. All of the above should be evidenced within the plan
	HOU7 - Adaptable and accessible accommodation	Modification sought	7.1.50	CE2	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. 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. There is an equally valid argument that market demand will drive design change when it is necessary
	HOU7 - Adaptable and accessible accommodation	Modification sought	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 accommodation	Modification sought	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 accommodation	Modification sought	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 accommodation	Modification sought	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
	HOU9 - Traveller accommodation	No issue			
	HOU10 - Housing management areas (HMAs)	No issue			

Section	Policy Ref	Position	Belfast LDP reference	Objection Cause	Change Sought
	HOU11 - intensive housing nodes	Modification sought	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, the timeframe for so doing and how it can be challenged
	HOU11 - intensive housing nodes	Modification sought	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
	HOU12 - Large scale purpose built managed student accommodation (PBMSA)	No issue			
	HOU13 - Short-term let accommodation	No issue			
	HOU14 - Living Over the Shop	No issue			
7.2	Urban design	Modification sought	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 this management is going to defeat market demand
	DES1 - Principles of urban design	Modification sought	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 sought	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 sought	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 sought	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 sought	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 sought	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 developments, 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 sought	Policy J	CE2	The retention of existing trees where they have not been covered by a tree preservation order will restrict design and construction. Trees that need to be removed should be replaced by similar tree types
	DES2 - Master planning approach for major development	Modification sought	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
	DES2 - Master planning approach for major development	Modification sought	7.2.25	CE2	The use of the wording "materials should complement the character" will result in passive development and should be altered to "materials should result in high quality design contrasting with or complementing the character"
	DES2 - Master planning approach for major development	Modification sought	7.2.27	CE2	The last sentence of this paragraph includes the sentence "This would,.... and the provision for new planting in cases where trees are removed for development". This contradicts DES2 section J which seeks to retain all existing trees. DES 2 J should be amended to reflect the wording in 7.2.27 as it provides better design solutions
	DES3 - Tall buildings	No issue			

Section	Policy Ref	Position	Belfast LDP reference	Objection Clause	Change Sought
7.3 Residential design	DES4 - Advertising and signage RD1 - New residential developments RD1 - New residential developments	No issue Modification sought Modification sought	7.3.10 7.3.11	CE2 CE2	This clause needs to reflect the potential use of greenspace within the surrounding area The design aim of this clause conflicts with the roads/car parking regulations. The regulations or the clause need to be brought into alignment
	RD1 - New residential developments	Modification sought	7.3.12	CE2	No detail is provided on the new regulations. This needs to be addressed and the industry consulted
	RD2 - Residential extensions and alterations RD3 - Conversion or sub-division of existing buildings for residential use	No issue Modification sought	7.3.3	CE2	This provision does not recognise that development in the past was not always good on 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.
		Modification sought	7.3.4	CE2	Explanation required of how good urban design can be achieved within current road regulations and mechanism for challenging road designs that are restricting schemes
		Modification sought	7.3.7	CE2	This clause needs to take into consideration the current roads regulations which prevents sustainable design. A list of criteria that should be achieved in road design would be a welcome addition to the policy. This to be agreed with roads authority A documented trail of who judges road designs and timeframes should be included
		Modification sought	7.3.9	CE2	No evidence base is given for "private open space should be designed to provide shelter and privacy". This policy is also contradictory as it also states that balconies would be welcome.
		Modification sought	7.3.10	CE2	The provision of large areas of open space does not complement the stated policy of increasing density in and around the city. This clause needs to be reflective of city wide density required to meet the city plan
		Modification sought	7.3.11	CE2	This clause needs to be adapted to take account of road regulations which necessitate the design of developments in the manner in which it is trying to prevent
7.4 Built heritage	BH1 - Listed buildings BH2 - Conservation areas BH3 - Areas of townscape character BH4 - Works to grounds affecting built heritage assets BH5 - Archaeology BH6 - Parks, gardens and demesnes of special historic interest	No issue No issue No issue No issue No issue No issue			
7.5 Community cohesion and regeneration	CGR1 - Community cohesion and good relations CGR2 - Meanwhile uses in interface areas	No issue No issue			
7.6 Promoting healthy communities	HC1 - Promoting healthy communities	No issue			
7.7 Community infrastructure	CI1 - Community infrastructure CI2 - Cemeteries and crematoria	No issue No issue			
8 Creating a Vibrant Economy					
8.1 Inclusive economic growth	EC1 - Delivering inclusive economic growth EC2 - Employment land supply EC3 - Major employment and strategic employment locations EC4 - Loss of zoned employment land EC5 - Industry and storage and distribution uses EC6 - Office development EC7 - Higher education institutions	No issue No issue No issue No issue Modification sought No issue			
8.2 Retail	RET1 - Establishing a centre hierarchy RET2 - Out of centre development RET3 - District centres, local centres and city corridors RET4 - Retail warehousing RET5 - Primary retail area RET6 - Temporary and meanwhile uses	No issue No issue No issue No issue No issue			
8.3 City centre	CC1 - Development opportunity sites	No issue			
8.4 Tourism, leisure and culture	TLC1 - Supporting tourism leisure and cultural development TLC2 - Existing tourism leisure and cultural facilities and assets TLC3 - Overnight visitor accommodation TLC4 - Evening and night-time economy	No issue Modification sought			

Section	Policy Ref	Position	Belfast LDP reference	Objection Clause	Change Sought	
9 Building a Smart Connected and Resilient Place	9.1 Infrastructure, telecoms and ITU1 - Telecommunications development ITU2 - Water and sewerage infrastructure ITU3 - Electricity and gas infrastructure ITU4 - Renewable energy development	ITU1 - Telecommunications development	No issue			
		ITU2 - Water and sewerage infrastructure	No issue			
		ITU3 - Electricity and gas infrastructure	No issue			
		ITU4 - Renewable energy development	No issue			
		W1 - Environmental impact of a waste management facility	No issue			
	9.2 Waste Infrastructure	W1 - Environmental impact of a waste management facility	No issue			
		W2 - Waste collection and treatment facilities	No issue			
		W3 - Waste disposal	No issue			
		W4 - Land improvement	No issue			
		W5 - Development in the vicinity of waste management facilities	No issue			
	9.3 Minerals	M1 - Minerals	No issue			
		TRAN1 - Active travel - walking and cycling	No issue			
	9.4 Transportation	TRAN2 - Creating an accessible environment	No issue			
		TRAN3 - Transport assessment	No issue			
		TRAN4 - Travel plan	No issue			
		TRAN5 - New transport schemes	No issue			
		TRAN6 - Access to public roads	No issue			
		TRAN7 - Access to protected routes	No issue			
		TRAN8 - Car parking and servicing arrangements	Modification sought			
		TRAN9 - Parking standards within areas of parking restraint	No issue			
TRAN10 - Design of car parking		No issue				
TRAN11 - Provision of public and private car parks		No issue				
TRAN12 - Temporary car parks		No issue				
9.5 Environmental resilience		ENV1 - Environmental quality	No issue			
	ENV2 - Mitigating environmental change	Modification sought				
	ENV3 - Adapting to environmental change	No issue				
	ENV4 - Flood risk	No issue				
	ENV5 - Sustainable drainage systems (SuDS)	No issue				
10 Promoting a Green and Active Place	10.1 Open space	GB1 - Green and blue infrastructure network	No issue			
		OS1 - Protection of open space	Modification sought			
		OS2 - New open space within settlements				
		OS3 - Ancillary open space	Modification sought			
		OS4 - New open space outside settlements	No issue			
		OS5 - Intensive sports facilities	No issue			
		OS6 - Facilities ancillary to water sports	No issue			
		OS7 - Floodlighting	No issue			
		NH1 - Protection of natural heritage resources	Modification sought			
		TRE1 - Trees	No issue			
		10.2 Natural Heritage	LC1 - Landscape	No issue		
			LC1A - AONBs	No issue		
	LC1B - AHSVs		No issue			
	LC1C - LLPAs		No issue			
	LC1D - Landscape wedges		No issue			
	LC2 - Lagan Valley regional park (LVRP)		No issue			
	LC3 - Belfast Hills		No issue			
	LC4 - Coastal areas		No issue			
	10.3 Trees	DC1 - All countryside development - general policy principles	No issue			
		DC2 - Housing in the countryside	No issue			
DC3 - Replacement dwellings		No issue				
DC4 - The conversion and reuse of existing buildings		No issue				
DC5 - New dwellings: personal and domestic circumstances		No issue				
DC6 - Dwellings for non-agricultural business enterprises		No issue				
DC7 - Ribbon development		No issue				
DC8 - New dwellings in existing clusters		No issue				
DC9 - Residential caravans and mobile homes		No issue				
DC10 - New dwellings on farms		No issue				
10.4 Landscape and coast	DC11 - Agriculture	No issue				
	DC12 - Farm diversification	No issue				
	DC13 - Other proposed development in the countryside	No issue				