

## **Response to Belfast Local Development Plan Draft Plan Strategy 2035**

### **Overarching Vision Opportunity**

It is important, in the first instance, to commend much of the Draft Plan Strategy and there is much of value in the many recommendations and draft policy positions. There is also an emerging vision for the city which, does, though, need stronger visual and graphic representation to convey the potential physical implications of ambitions to increase the employment numbers and resident population in the city.

There was good engagement work, across city neighbourhoods and among sectoral interest groups, by committed Council personnel, to encourage active participation in collaborative responses to the plan documents, including the Developers' Contributions Framework. It is a missed opportunity, in my view, however, that for citizens and, particularly citizens' and residents' associations that there was no availability of technical help to prepare and articulate responses and comments.

The Local Development Plan affirms that it has been prepared in the context of the Regional Development Strategy which, unfortunately, maintains the direction of the 1960s Matthew Plan which hollowed-out the city of Belfast and developed the commuter towns. The very commuter-belt towns which cause the traffic congestion at peak times, the scale and quantum of which 'require' the width of roads and extent of lane-ways and forward-sight-lines that actually counter the ambition for a city, *'beautiful, well connected and culturally vibrant.'* (page 19, ref 3.2.2)

That strategy /goal is at odds with the 'plan' to grow the population of Belfast, particularly without a definitive implementation plan of action to increase the city's population and without doing so at the expense of regional towns and cities. The RDS is a polycentric growth strategy and still makes commuting attractive and seems to be contradictory to the plan to grow Belfast.

The Plan to 2035 is too short in the continuum of a city's morphology and growth and one would hope that subsequent iterations would at least point to ambitions for a 50-year plan for the city and wider metropolitan area.

There is no indication of a plan which approximates locations of anticipated housing areas. There is no plan to suggest what new housing typologies might be developed. Both of these seem to us to be crucial if Council wishes to work in a partnering way with resident communities and with those others who have the city's best interest at heart. And, additionally a collaborative working methodology is central to developing supportive housing typologies that respond to need, to financial models, and to building a sustainable city.

It would seem important that the anticipated numbers of population increase across the inner-city core could quite easily have been defined for each of the 5 *'districts of the city*

*centre* (ref 3.4.3). And it is worrying (taking example of the Inner North West Quarter) that ambitions for mixed-use, 'culturally vibrant' city areas have as their first major new planning application a largely, mono-function office building. How might such an area expect to be location for new residential areas without leadership, and, perhaps, without a design for the city led by Belfast City Council, particularly with opportunity of proposing mixed-use, on its own sites?

There is, additionally, worrying trend in some emerging proposals and, indeed, current planning applications that Private Rented Sector (PRS) housing is the preferred model for a number of large developers. Such model is not entirely appropriate - it does not include /assume provision for families; the units are sized such that those on housing benefit cannot afford the rent levels.

The Local Development Plan states that it will replace BMAP and yet such bold statement neglects to advise, much more clearly, which of the detailed mapping; conservation areas; areas of townscape character, or urban design guidance documents will be retained, updated etc.

BMAP was a huge, though wieldy resource, and a plan to replace it requires substance or clear agenda in the first instance, and indication of detailed direction and some clarity about the range of documents and policies that will be changed.

It is indeed 'critical to tackle persistent social inequality' in the city (p3, ref 1.1.4), it is misleading and inaccurate to contrast '*enhanced public realm, Titanic Quarter ...with the communal territorial disputes ...*' That binary reading omits reference to the extent of investment and attention afforded to the commercial core and 'preferred' quarters of the city, at the expense of inner-city neighbourhoods. It is the lack of focus and lack of investment in the inner-city areas that causes them to be understood, or perceived, as locus of sectarianism. The blight of which is as much a middle-class issue.

## City Context

In that regard The Belfast Local Development Plan Draft Plan Strategy 2035 doesn't reference 'The Troubles': it doesn't reference the nature of an emerging post-conflict city that has 87 hectares of land in the shadows of the walls and barriers (physical, economic and social) that we seem, as a society to be unable to talk about. The ambition expressed (ref 5.4.2) for 'creation of lifetime neighbourhoods' is useful reminder of the collective memory of place that is so important in any city but, in my view, the suggestions for 'temporary interventions and public art' is much too tame for the enormity of the problem and task to actually help address the 'spatial legacy'.

There is urgent need to make real plans for regeneration of neighbourhoods that could allow discussions on walls, boundaries and on porosity.

There seems little reference to a plan for a citizen-led city rather than the retail-led agenda which is the current paradigm.

Many of the questions in the Plan are closed questions and, in their essence, have basic good intentions but require experience to fully critique the underlying policy intentions from those responding.

Council really should have helped developed capacity building engagement and participation workshops which could have been facilitated by the Partnership Boards in collaboration with the universities and agencies such as PLACE (an agency in which Council was a founding partner).

The Plan and indeed the Belfast Agenda notes Council's strategic partners but it is striking that there is no inclusion of citizen-led or citizen focussed organisations such as the Partnership Boards; PLACE; Civic Trust, or residents' associations. Indeed, no mention is made of the universities, as institutions or as bodies of active young people. No mention is made of the Department for Communities Ministerial Advice Group (MAG) and its design review role.

The Local Development Plan continues on the track of 'retail-led' regeneration for the city - a plan which, in 15 or more years, has failed to deliver other than shopping units and in the current emerging retail focussed plans for the city continues to shape the city as if only retail matters. Retail has already shifted its gaze and direction and lessons from the U.S. and elsewhere remain readily available precedent studies.

Current and emerging real development proposals include large scale demolition of historic fabric and ignore the role of small independent retailers in low-grade relatively cheap accommodation as part of the offer of the city, particularly in mixed-use and cultural quarters. Such proposals also include loss of the public, democratic space of the city to privately managed shopping thoroughfares.

The document is light on any reference to aesthetic values or to an ambition for design quality. Creativity and innovation in design and construction and an ethos which promotes beauty, innovation and sustainability is a key guiding principle of the Policy for Architecture and the Built Environment and as such should resonate throughout this document. It will be the continuing development of a distinctive and authentic urban environment that will meet the needs of citizens that will attract tourists for repeat visits and longer-stay durations.

Council has taken the lead in restoring many historic buildings in the city centre and those key buildings with the addition of new quality buildings and public spaces and expanding public realm will contribute to our own distinctive local character.

The Draft Plan Strategy provides good acknowledgement of quality of life issues and affirms the principle of a holistic approach to city development but overall would benefit from reference and commitment to partnerships and strategic alliances with the private and community sectors and other agencies and with government departments.

The description of the 'centre city' would also benefit from reference to the importance of a physically and spatially connected city and, indeed, of the value of the near-neighbourhoods. Economic, social and cultural activity is not just confined to the centre city.

City Council could and should, in my view, lead by best practice and offer a number of its own sites /land bank to help deliver the one-city, connected and mixed-use vibrant place that we all want. Council could use the resource of the universities to help organise design and developer competitions to investigate the range of options of city-centre living that by a process of dissemination and engagement could help citizens begin conversations about quality of life and provision of service and facility that will attract people to live in the city core and inner-city neighbourhoods.

## The Challenges

The challenges facing civic administration and citizens are well described though the '*need to develop a total place agenda ...*' requires a clear commitment to the principles and detailed outworking of urban stewardship and to programming of areas of public space.

The 'need to nurture city centre cohesion' and to develop a '*strategy focussed around (creating) ... a destination of choice*' should, in this writer's view, primarily promote the city centre as a place for citizens. The city centre is not just about retail, business and employment or destination for tourists. City centre living and urban vibrancy offers a much richer authentic quality of urbanism.

The Plan document notes on numerous occasions that it wishes, or intends, to designate land (even lands in current private ownership?). If so, how then might such plans be delivered? Would it be appropriate to zone lands for a 5-year period and if proposals have not been delivered then to consider re-zoning or alternative development strategies?

Why not declare the actual commitments for the first 5 years – say, 10,000 trees; 5,000 new homes; 5,000 new jobs, and importantly suggest, or preferably propose the locations in which such intentions /promises might be delivered?

Why not declare the indication of timetable to an action programme, the detail of which will follow as the further stages of the Plan are developed?

The lack of reference to OECD and their best practice examples is worrying and the lack of reference to its huge resource (that still, of course, requires critique) is clear omission from the Plan. OECD offers to share expertise and advice; organise reviews on policy; design study missions; help establish trans-continental links (we are still in the EU and will remain in Europe), and they (OECD) assist with bi-lateral co-operation.

Housing remains a huge problem for our city. The policy ambition (ref 7.1.5) to 'facilitate city centre living ...to secure higher density development ...' seems 'at odds' with parking policy provision of 1 car parking space per unit in the city and inner-city. It seems almost impossible to deliver such car parking requirements if the target densities of unit numbers per hectare are to be achieved in our sub-strata of sleech within which basement car parks may be constructed.

The ambition of Policy HOU 5 (ref 7.1.26) to require a '*minimum provision of 20% of units as affordable housing ...and possible a higher proportion ...*' is commendable and an important target for the city. It registers with clarity the need to provide, in the first instance, for the huge number of people in housing stress which is reportedly much higher (at 12,000) than the number noted (ref 2.1) of 7,300.

Policy Des 1 notes 11 principles of urban design which in themselves are fine as far as they go but it would seem to be important to acknowledge a requirement for innovative development models and design proposals that explore a contemporary built language, particularly if the increased density targets are to be met.

I agree with Policy DES 3 that 'existing tall buildings within Belfast will not set a policy precedent for similar developments on adjacent sites.' Too much historic fabric has been lost and poor quality development permitted because of spurious arguments about scale and height of adjacent buildings.

It is a missed opportunity that the space standards noted in Appendix C remain at the existing space standards for social housing and fail to improve on these or, indeed, to recommend the emerging space standards currently in draft form in Department for Communities which have suggested more generous provision, including balconies, winter gardens et cetera.

## **Conclusion**

I extend my best wishes to the Council team tasked with the enormity of the task of producing a new plan for the city, including new policy statements and policies.

I would certainly wish to be informed of future Plan documents and information or feedback sessions.

Belfast is a city emerging from conflict. And despite the issues of severance, separation and vacancy there exists great possibility to co-create an authentic city place, rooted in the character, vibrancy and vitality of our city neighbourhoods. Bridges rather than walls. Hedges and trees rather than walls and solid steel gates are necessary metaphors but also crucial touchstones to help build on our common ground.

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For and on behalf of ARdMackel  
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