



**MARKETS**  
DEVELOPMENT  
ASSOCIATION

Markets Community Centre

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Belfast Planning Service  
Ground Floor  
Cecil Ward Building  
4-10 Linenhall Street  
Belfast  
BT2 8BP

**RE: Draft Local Development Plan Consultation Response**

To whom it may concern,

I am writing on behalf of the Market Development Association in response to the Draft Local Development Plan for Belfast (2035).

The LDP Plan Strategy has been prepared in accordance with the legislation which requires a statutory link to the Community Plan, The Belfast Agenda. The MDA welcomes the link between the LDP and the Community Plan as it provides the opportunities for communities to be involved in the planning and delivery of public services. The MDA supports how the LDP has been prepared to support the Community Plan in order to ensure economic, social and environmental issues are holistically considered to deliver sustainable development up to 2035.

Most of the content of the Draft LDP is taken from draft BMAP (2015), and incorporates many of the policies and designations from draft BMAP, however the MDA supports the addition of new policies which are within the draft LDP for Belfast, particularly in relation to Housing, Sustainable Development, Tall Buildings, Urban Design and Community Cohesion and Good Relations. The draft LDP follows a different structure to draft BMAP (2015) and other previous development plans, and the Strategic Aims and Objectives are reflective of the themes from The Belfast Agenda. The MDA agrees with the strategic objectives of Shaping a Liveable Place, Creating a Vibrant Economy, Promoting a Green and Active Place, and Building a Smart Connected and Resilient Place.

It is a progressive sign that the draft LDP has acknowledged the spatial legacy of the Troubles at an early stage in the Plan Strategy and that it also recognises that the troubles, alongside deindustrialisation and housing redevelopment, has had a negative impact and has weakened the city's economic and social base. In addition, the draft LDP recognises that Belfast continues to be a 'tale of two cities' and contains some of the most affluent and

some of the most deprived areas in the North of Ireland. Also, the draft LDP highlights that Belfast has a population characterised by a growing number of children, young people and an ageing population.

Despite these challenges, the vision for Belfast is ambitious and aims to create an additional 46,000 jobs, welcome an additional 66,000 people and reduce the life expectancy gap between the most and least deprived neighbourhoods by 33%. It is evident that the efforts aimed at addressing the issues of Belfast have failed so far, and what is needed is a collaborative approach between planners, statutory agencies, public bodies, citizens and the community and voluntary sector. The Plan Strategy is only one side of the Belfast Local Development Plan, and although the Local Policies Plan is vital in achieving the ambitious aims for the city, ultimately success will depend on the Spatial Plan for the City and how Belfast is developed in a way which is inclusive, and which meets the 5 Core Planning Principles of the SPPS.

As within the draft BMAP (2015), the draft LDP outlines Strategic Policies which embody the broad principles upon which the LDP is built, however it emphasises that inclusivity is also at the heart of the LDP and it recognises that communities and the economy are dependent on the environment and are therefore bound by its limits and capabilities. The MDA agrees with and supports the eight strategic policies within the draft LDP, however some are very ambitious and may be more difficult to put into practice than others, particularly Policy SP4- Community Cohesion and Good Relations. The MDA also supports the hierarchy of settlements and settlement areas within the principal city of Belfast, however at this point of the Plan Strategy the figures and maps need more clarity. The lines and boundaries on the figures for several of the figures are blurred and creates difficulty in deciphering settlement boundaries etc.

The bulk of the Plan Strategy is comprised of Plan Policies which are grouped under the four Strategic Objectives as outlined above, each of which contain sub headings and policies related to said objective.

## **HOUSING**

The draft LDP acknowledges the fundamental role which housing plays in shaping lives and communities and it states that “the LDP process is the main vehicle for assessing future housing land requirements and managing growth” (SPPS, September 2015). The draft LDP also highlights the demand for affordable homes in the City and resolves that the LDP can help rectify supply shortage by identifying suitable land. One of the policy aims is to “Ensure an appropriate supply of land to accommodate the new housing required to grow the population”. However, unlike with the vision to create an additional 46,000 jobs and provide 550,000m<sup>2</sup> of employment floorspace, there has been no research into the available land or land needed to accommodate the vision of 31,600 additional homes. The draft LDP states that the windfall allowance for the Plan Strategy period is very low, reflecting the preference for a planned approach in zoning sufficient housing land within the city to meet identified need, however there is no attempt to quantify within the policy how much land this would equate to.

The policy on the protection of existing residential accommodation (Policy HOU3) is welcomed by the MDA and is important for inner communities across the city, however the policy does not go beyond the retention of residential stock and should also provide protection to long established communities. This policy refers to short term holiday accommodation as a change of use and there is a dedicated policy (Policy HOU13) to deal with this within the draft LDP, and a much-needed policy at that. The draft LDP states that short term holiday accommodation (lets of 1-90 days) should be sited within a tourism cluster

or in proximity to a visitor attraction, unfortunately however this is not the case and this type of accommodation is eroding the housing stock of many areas.

Technical Supplement 2; Housing; highlights that in Belfast in July 2018 there were 1306 properties on Air BnB, 62% of which were entire homes (810 homes) and 34% were private room rentals. The technical supplement also suggests that the magnitude of the issue has prompted Belfast City Council to take a proactive approach which has resulted in a standalone policy within the draft Plan Strategy, seeking to manage provision of short term lets in the city. However, to date there has been little to no monitoring, regulation or control measures put in place for short term lets, particularly Air BnB and this has caused a detrimental impact on many communities. Have the 1306 current short term let accommodation received planning permission for their change of use? If not, how is Council monitoring and controlling this along with the Tourist Board and other relevant agencies?

The MDA welcome the new policy in relation to Affordable Housing (Policy HOU5), which requires provision of 20% of affordable homes on sites of 0.1 ha or greater/5 units or more and we also agree with the policy where it states that affordable housing should be “pepper potted” and “tenure blind”. However, concerns are raised when the policy proceeds to suggest that developers may provide affordable housing on a suitable alternative site or may provide a reduction in the number of affordable homes. This is concerning as the policy suggests this may be done on a “case by case” basis but it may be used as an excuse for developers not to incorporate affordable housing within their development as has been the case previously.

The Shaping a Liveable Place section has a few gaps in relation to lack of policies present or reference to policies which promote mixed use development (housing, retail, employment, social space). In addition, there is a lack of clarity on the location of land for the vision of the 31,600 homes, particularly the 3,800 to be built between the period of 2020-2025. The draft LDP does not include policies on promoting city centre living for families and it does not discuss development which meets the needs of families such as schools, health facilities etc. Also, with regards to short term holiday accommodation, the policy is not strong enough to protect existing residential communities. It does not protect the residential stock in areas of high residential need and there is not enough emphasis on the regulation of this type of development.

## **URBAN DESIGN**

The section and policies in relation to urban design are crucial for the LDP and the MDA agrees that promoting and protecting high design standards is intrinsic to the sustainable growth of the city and can add value to people’s lives. The MDA supports Policy DES1 particularly in relation to the unacceptability of basement/semi basement car parks which create dead frontage and a threatening and unpleasant environment.

In addition, a vital policy which has been introduced to the draft LDP in relation to Tall Buildings (Policy DES3) is supported, however the statement within the policy which suggest that existing tall buildings within the city will not set a precedent for similar development appears to be a disclaimer by Belfast City Council given the amount of tall buildings which have been approved since the transfer of planning powers in 2015. In fact, much of the urban design policies, which are integral to sustainable development, are currently not the views or practices of the current planning system, and the current planning system is very much in favour of badly designed tall buildings which have a negative impact on their surrounding environment.

Again, the acknowledgement that planning cannot ignore the spatial legacy of the troubles is welcomed and the need to address both the physical legacy and social relationships are essential to the effective delivery of the LDP. The introduction of a policy in relation to Community Cohesion and Good Relations is imperative to the sustainable development of Belfast and to achieving the vision of the LDP and The Belfast Agenda.

## **VIBRANT ECONOMY**

It is agreed that a vibrant economy is vital in order to develop a sustainable city which is inclusive for all, however this section of the draft Plan Strategy does not pay enough attention to the third sector economy and the benefits which social enterprise and community business can contribute to the regeneration of the city and the creation of a vibrant economy.

The draft LDP recognises that the city centre fringe area is characterised by vacant and underused sites and buildings, blighted by a lack of investment and development. These areas of the city may remain the same unless there are more creative and innovative solutions for development for example through community infrastructure projects and social enterprise. The biggest challenge with derelict/vacant buildings and land is the ownership and often the unwillingness of the owner to invest in their property or land. Belfast City Council should take a proactive approach in addressing the issues of vacancy and dereliction and could work collaboratively with statutory agencies, public bodies and the community to vest the property/land and to regenerate the area.

Figure 8.4 of the draft LDP shows the Existing City Centre Masterplan areas, however there is potential to include the Gasworks Northern Fringe Masterplan within the LDP, which is an area much needed of regeneration and development to include homes, social enterprise and travel accommodation.

## **ENVIRONMENTAL RESILIENCE**

The implementation and monitoring of some of the suggested policies raise concern, particularly in relation to Travel Plans (Policy TRAN 4), which states that planning permission for development proposals with significant travel generating uses will require a travel plan. This seems like an obvious solution but how effective will it be in reality? How many developments will implement such a travel plan to discourage car use or encourage public transport? Who will regulate and monitor this? There is a fear that the production of a Travel Plan will be another tick box exercise in order to gain planning permission.

The Environmental Quality policy (ENV1) is quite vague despite covering a multitude of environmental considerations and the figure which displays Belfast's 4 Air Quality Management Areas (AQMA's) is alarming. The Market area is located between two AQMA's (Cromac Street and Ormeau Road), and yet it is surrounding by new office development and uses which generate significant travel and commuters into the area. Again, more emphasis needs to be put on addressing these issues and Belfast City Council should take a proactive approach in addressing the issues of air pollution and traffic congestion. There is no mention within the draft LDP of any effort to address commuter parking in inner city communities and Belfast City Council could use the LDP to assist in the implementation of their Car Parking Strategy, for example through developer contributions to finance resident's parking schemes.

## **DELIVERY**

The Delivery section of the draft LDP briefly discusses implementation, monitoring and review of the Local Development Plan for Belfast, however there does not seem to be any community involvement planned in these stages of the process.

There is reason to question how the Plan Strategy relates to the current boundaries and zonings as designated in draft BMAP (2015) and it is difficult to fully assess how effective or successful the policies within the draft LDP will be until the Local Policies Plan for the LDP 2035 is also completed. The figures provided with the draft LDP are too vague and general to make any real judgement on future impact of policies and the Local Policies Plan is the important element of the draft LDP which will dictate zoning, boundaries, character areas and designations. This phase of the process is integral to the overall development of the LDP for Belfast, and community and citizen involvement is intrinsic in creating an LDP which will be inclusive for all and which will achieve the aims, objectives and visions of the Local Development Plan and The Belfast Agenda.

We trust that Belfast City Council find the MDA's response useful in assessing the draft Local Development Plan and we look forward to being involved in the next phase of the process, the Local Policies Plan.

Kind Regards,

Kathleen McCarthy

  
Market Development Association