

Belfast LDP 2035: draft Plan Strategy Sustainability Appraisal

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. Your opinion matters 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 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.

Sustainability Appraisal Incorporating Strategic Environmental Assessment (SA/SEA)

A Sustainability Appraisal (SA) is a methodical process that is undertaken during the preparation of the Local Development Plan. It promotes sustainable development by assessing the extent to which the emerging plan will help to achieve the environmental, economic and social objectives.

A Strategic Environmental Assessment (SEA) is to ensure a high level protection of the environment and to integrate environmental considerations into the preparation and adoption of plans. Together, these processes seek to ensure that the options outlined in the draft Plan Strategy are the most appropriate and sustainable, having regard to the reasonable alternatives.

Both the SA and SEA are required in relation to the development plan documents, which comprise the Plan Strategy and Local Policies Plan.

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.

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, and publish it for public scrutiny.

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

- 1 Please tick to confirm that you have read and understood the privacy notice above.
(Required)

Please select all that apply

- YES** 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.

2 Do you consent for us to publish your response?

To facilitate more open and transparent government, Belfast City Council would like your permission to publish your consultation response in the public domain. Should you prefer us to treat your submission as confidential - either by publishing it as an anonymous response or by not publishing it at all - please indicate accordingly.

(Required)

- Yes, please publish my response with my name
- Yes, please publish my response, but only include my organisation's name (for those responding on behalf of an organisation)**
- Yes, please publish my response, but do so anonymously
- No, please do not publish my response (treat as confidential)

B. Your details

3 Are you responding as an individual or on behalf of a 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)*

4 What is your name?

5 What is your telephone number?

Telephone number

6 What is your email address?

C.

Individual

If you have selected that you are responding as an individual, please complete this Section, then proceed to Section F.

7 What is your address?

Address Line 1 (Required)

Address Line 2

Address Line 3 (Required)

City

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.

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

Organisation (Required)

Department for Communities
Historic Environment Division

Your Job Title (Required)

[REDACTED]
[REDACTED]

Organisation address (if different from above):

Address Line 1 (Required)

Department for Communities - Historic Environment Division

Line 2

Level 6 Causeway Exchange

Line 3

1-7 Bedford Street,
Town Parks

City

BELFAST

Postcode (Required)

BT2 7EG

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.

9 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 (Required)

10 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. Plan, Policies and Programmes Review

We have undertaken a review of the plans, policies and programmes that may affect or influence the SA of the draft Plan Strategy. Appendix 4 of the Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment identifies all the plans and programmes that were considered. It provides a brief synopsis of the plan or programme, an outline of its scope and objectives, how it potentially relates to the LDP and whether it is likely to have in-combination effects. The Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment can be found via: www.belfastcity.gov.uk/LDP.

11 Are there other relevant policies, plans and programmes that will affect or influence the Local Development Plan/Sustainability Appraisal, which have not been included in the list?

(Required)

Please select only one item

Yes No Not sure/ Don't know

Historic Environment Division advise that the following Guidance Documents will be pertinent to the ongoing development plan process

Guidance on Sustainability Appraisal and Strategic Environmental Assessment for the Historic Environment

<https://www.communities-ni.gov.uk/publications/guidance-sustainability-appraisal-and-strategic-environmental-assessment-historic-environment>

We welcome the inclusion of the Xi'an Declaration in the table of plans and programmes and would advise that our own Guidance on Setting and the Historic Environment will be a pertinent consideration moving forward to the Local Policies stage.

<https://www.communities-ni.gov.uk/publications/guidance-setting-and-historic-environment>

Historic Environment Division would advise that your text in relation to the Valletta Convention is inaccurate (it is not a division of the Granada Convention) We would advise that specific implications of Valletta in relation to your local development plan relate to

Article 5 which articulates integrated conservation of the Archaeological Heritage through

its consideration in the preparation of LDPs and the creation of planning policies designed to ensure well-balanced strategies for the protection, conservation and enhancement of sites of archaeological interest

With regard to the Granada Convention specific implications relate around Article 10 which

Articulates inclusion of the protection of the architectural heritage as an essential town and country planning objective and ensure that this requirement is taken into account at all stages, both in the drawing up of development plans and in the procedures for authorising work;

G. Baseline Information

The collection of baseline information is necessary to inform the SA. This information provides the current state of the social, economic and physical environment and identifies trends to indicate whether the situation is getting better or worse. It provides the context for assessing the sustainability of the options set out in the draft Plan Strategy.

The baseline information is set out in Appendix 5 Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment. It should be noted that the information reflects data collected from 2016 to 2018 and that the collection of baseline information will be updated on an ongoing basis.

12 Do you think that the baseline data collected is appropriate i.e. at the right level and sufficient coverage with nothing missing? (Required)

X NO

Scoping Report Appendices D9 9.1, ASAI. While the range of baseline evidence covered in the document in relation to the historic environment is comprehensive Historic Environment Division would advise that it lacks some detail in relation to the Giant's Ring Area of Significant Archaeological Interest. We note the publication of the map of this area within the context of the SA documentation but the text in relation to ASAI seems generic and refers only to their designation through the local development plan process. There should be a more focused discussion in relation to the Giant's Ring ASAI and the associated policy for it which in itself is baseline evidence. It has implications with regard to both the Historic Environment Policies (as a site of Regional Importance) and in relation to the local policies plan.

HED also advise on the importance of reviewing the evidence at each stage of the plan. We would advise the importance of the datasets as an ongoing evidence base at local policies stage and the scheduled areas polygons will be particularly important to take into account. We advise that the scheduled area of the Lagan Navigation has a particular relevance to the policy development around green and blue infrastructure. The Scoping Report Appendices Document, -Appendix 13 – The title "Scheduled Zones" for this Appendix seems to be in error. The actual table lists monuments which are scheduled and also those which are aren't. It may be that this would be more accurately titled "Historic Monuments" or "Sites and Monuments Record Entries".

Scoping Report Appendices D13, 13.1 The last line of this paragraph is incorrect. The Industrial Heritage Record is part of the National Monuments and Buildings Record maintained by DfC Historic Environment Division (not DAERA)

13 Have we got the Sustainability Issues right?

Analysis of the baseline information has enabled several key sustainability issues (including environmental problems) to be identified. This provides an opportunity to develop sustainable plan objectives and options.

Table 6 of the Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment, identifies the set of key Sustainability Issues and describes the likely evolution of each key sustainability issue if the Belfast LDP were not to be adopted.

(Required)

Please select only one item

X Yes No Not sure/ Don't know

If 'No' please provide details:

14 Are there any other Sustainability Issues that should be included? (Required)

Please select only one item

X Yes No Not sure/ Don't Know

HED suggest that in relation to the Cultural and Built Heritage Theme clearer reference is required to archaeology as a sustainability issue i.e.

- Risks to previously unidentified heritage assets including impacts on previously unidentified below ground remains.

H. Sustainability Objective

A Sustainability Appraisal promotes sustainable development by assessing the extent to which the emerging plan will help to achieve identified environmental, economic and social objectives. These objectives were set out in the Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment.

15 Have we got the Sustainability Objectives correct? (Required)

Please select only one item

X Yes No Not sure/ Don't Know

Historic Environment Division agree with the Sustainability Objective for the Historic Environment, which aligns with the SPPS and RDS.

16 Are there any other objectives that should be included (bearing in mind the need to keep the number of objectives manageable?)

(Required)

Please select only one item

Yes **No** Not sure/ Don't Know

If 'Yes', please provide details:

17 Should any objectives be re-worded or removed?

(Required)

Please select only one item

Yes **Not sure/ Don't Know**

If 'Yes', please provide details:

I. Reasonable Alternatives

The SA Report undertakes an assessment of reasonable alternatives to the options contained in the draft Plan Strategy. This appraisal identifies the options considered and assesses the compatibility of each option against the SA objectives.

Appendices 7-12 of the Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment set out the results of this appraisal.

18 Are there any alternatives that, in your opinion, are not viable? (Required)

Please select only one item

Yes No **Not sure/ Don't Know**

HED advise that we have focused attention primarily with regard to Historic Environment matters and can advise that with regard to the historic environment policies that none of the options are unviable. We expect that other consultees will provide comment in relation to their own areas of expertise.

19 Are there any viable alternatives that may have been missed? (Required)

Please select only one item

Yes No **Not sure/ Don't Know**

If 'Yes', please provide details:

20 Are the mitigation measures identified appropriate?

Please select only one item

Yes **X No** Not sure/ Don't Know

HED would have concerns that there is not enough detail around potential mitigation needs around negative effects particularly in relation to archaeology and previously unidentified below ground remains. It should be possible to mitigate some of these issues at local policies stage through the application of key site requirements where appropriate, and through appropriate designation.

J. Monitoring

Monitoring is intended to identify any unforeseen adverse effects of plan implementation at an early stage and implement the necessary remedial action. It should focus upon the likely significant effects identified by the SA and the mitigation measures proposed to offset these.

Monitoring allows the actual significant effects of the implementing the plan to be tested against those predicted in the SA. Monitoring measures have been proposed in the Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment. These may be narrowed down as the LDP process progresses and the likely effects can be identified with more certainty.

21 Are the monitoring arrangements and indicators correct?

(Required)

Please select only one item

Yes **x No** Not sure/ Don't Know

HED welcome the monitoring indicators outlined but recommend further meaningful indicators to monitor the implementation of planning policy in response to question 22 below.

22 Is there any information not present in the Sustainability Appraisal that, in your opinion, would be beneficial to monitor and could be monitored? (Required)

Please select only one item

X Yes No Not sure/ Don't Know

HED would advise that in a potentially useful indicator would be the monitoring of archaeological excavations arising as a result of planning applications (i.e. through requests for further information or through planning conditions in the district). This would aid monitoring the effectiveness of implementation the planning policies and mitigation.

We would also consider that monitoring of planning approvals which go against the advice of statutory consultees such as HED would be useful in monitoring the effectiveness of the plan in implementing policies and objectives, e.g. in relation to policies of built heritage or in relation to implementation of a tall buildings policy.

K. Conclusion

23 Do you have any other comments on the SA Report?

YES Please enter any comments:

HED would disagree with some of the scoring afforded within the Sustainability Appraisal. In order to make it more robust in relation to assessing and scoring potential effects on the historic environment we advise that some review may be necessary.

We reiterate our advice that generally new development will have a destructive impact on any below ground archaeological evidence, including where these are previously unidentified. Although the compatibility table articulates the potential impacts with regard to removal of archaeological remains this is not always articulated in mitigation across the matrices. HED consider that reference to the potential negative impacts should be considered in scoring and mitigation in instances where policies are designed toward housing and economic development.

We highlight the following areas:

SA Report including SEA Appendices 11-12

Page 41 SP4. Heritage has a demonstrable role in the promotion of community cohesion, shared identity and understanding. We consider that the policy has the potential to have positive effects for the historic environment theme

Table B.5 SP5 Positive Placemaking.

HED would consider that the afforded positive effect of the policy on the historic environment could be more securely achieved if terminology recognising historic context was clearly articulated in policy amplification text (see our comments on the DPS policies)

Table B.11. SD 3. City Centre

While there are potential benefits to re-use of heritage assets HED advise that mitigation should also consider impacts on archaeological remains, particularly given the evidence base including the Area of Archaeological Potential, in order to offset negative impacts

Table B.12 HOU 1 Accommodating new homes

HED consider that an uncertain scoring would be more appropriate in relation to effects of both options in relation to the historic environment objective

Potential negatives include development in the setting of heritage assets, historic structures continuing to be neglected and to decay, or destruction of previously unidentified below ground archaeological remains or of elements of historic landscape. Potential mitigations might include enabling development KSR for archaeological work or appropriate designation

Table B.14. HOU3 Protection of existing residential accommodation.

HED note the potential negative outcomes envisaged in relation to Option 2 with regard to a potential uptake of peripheral greenfield land to some related objectives (landscape/natural heritage interests). We advise that a negative/uncertain score for option 2 for its potential effects on the historic environment would be appropriate. due to potential effects on previously unidentified below ground archaeological remains and historic landscape character

Table B.29 DES1 Principles of Urban Design

HED would concur on the potential positive effect for the historic environment and would highlight that mitigation could be considered here to offset negative impacts on below ground archaeological remains.

Table B.30 DES 2 Masterplanning for Major Developments

HED would advise that if the policy text is made more sound in relation to existing landmarks we consider that a positive outcome in relation to 12 could be more securely achieved. See our comments on the DPS policy text.

Table B 42 CGR1 Community Cohesion and good relations.

We highlight that the comments in relation to SA 12 don't clearly relate to the objective in that they refer to the built environment only, without clear consideration of heritage interests. To justify the positive score the benefits for the historic environment should be articulated more clearly and with consideration toward any necessary mitigation of any potential negative effects

Table B 68 ITU 4 Renewable Energy Development

HED Concur with scoring in relation to effects on the Historic Environment but suggest that impacts on setting of heritage assets should be articulated in the text, to make assessment more robust

Table B 71 W3 Waste Disposal

HED would advise that there is potential for significant negative effects in relation to the historic environment including alteration of historic landscape character and disturbance, destruction or damage to heritage assets including previously unidentified assets such as below ground archaeological remains. We advise that scoring with reference to the historic environment is more likely negative or uncertain. The comments do not justify a neutral effect and HED highlight that heritage assets are not restricted to the urban environment.

Table B 72 W4 Land Improvement

Our comments in relation to Table B71 also apply here. There are almost certainly effects to the historic environment with changes to topography and historic landscape character.

Table B74 M1 Minerals

The comment in relation to the historic environment objective 12 articulates positive effects while the score is negative. As presently worded the policy does not ascertain a positive impact for the historic environment as it does not articulate heritage interests in policy or amplification text (see our comments on DPS Policy). HED would suggest a negative or uncertain score given the demonstrable impact that quarrying has had on historic landscape character and on below ground archaeological remains including previously unidentified remains.

Table B79 TRAN5 New Transport Schemes

HED disagree that the policy has no effect or relationship with the objective 12. The policy specifically articulates canals – The Lagan Navigation, the major canal in the district is a scheduled historic monument. The added protection afforded to the route should bring a positive effect in this instance.

Table B86 TRAN12 Temporary Car Parks

HED consider that the policy has the potential for positive effects in relation to 12, -i.e. through ensuring that plans plots left vacant in conservation areas or areas of townscape character through demolition must have planning permission in place so that they are not left derelict

Table B92 GB1 Green and Blue infrastructure

HED would suggest that your comments in relation to the positive scoring of effects in relation to objective 12 should also reflect the potential for direct positive impacts through sensitive sustainable use of heritage routeways such as the scheduled Lagan Navigation.

Table B98 OS6 Facilities ancillary to water sports

The amplification text for the policy specifically mentions canals - in the Belfast Context the Lagan Navigation is a scheduled historic monument. We consider that this merits mention in the

comments text although we would accept that as worded the policy cross references to other relevant policy requirements and adverse impacts should be avoidable.

Table B100 NH1 Protection of Natural Heritage Resources

HED highlight the close relationship of the historic environment to natural heritage and landscape interests. HED disagree with the scoring afforded. Protection of natural heritage interests will almost certainly lead to positive benefits in relation to objective 12 in terms of protecting heritage assets and historic landscape character. Many rural heritage assets also perform a function as a habitat for wildlife and biodiversity.

SA Report including SEA Appendices 7-9

With regard to the discussion of effects around the options in Table A.16 Historic Environment Division would have some concern that there is no realisation of the potential positive effects on economy of having policies around the historic environment given the key role that heritage assets play in attracting tourism, filming and consequent investment.

HED have reviewed the considerations given to our comments (Appendix 9) provided at preferred options stage and overall we welcome the consideration afforded.

Page 260 Point 3 HED would consider that the policies in the LDP do have potential to influence reuse of historic buildings or conversely, and inadvertently, neglect of these which could have effects on the BARNI register.

Page 267 Plans Policies and Programmes review. –See HED comments in relation to Valletta and Granada in the answer to Question 11 above.

Page 277 We advise that the responded consideration given to our comments around our suggested use of the terminology “historic environment” is worded rather clumsily. Whilst we accept that in the context of the SA the council wish to continue to use the term Cultural and Built Heritage, we advise that Historic Environment Division are concerned that the focus in parts of the documentation has tended to consider heritage assets as built and urban fabric only, rather than landscapes, below ground remains and archaeology. As with other national heritage bodies across the UK we utilise the term “historic environment”. As per our Guidance on SA we consider that we live in an historic environment which can be conserved through sustainable change. We stress that the Belfast district has a historic rural component as well as an urban landscape, and are uncertain as to appropriateness of citing academic debate in relation to our comment.

Page 278 – Our comments in relation to the ongoing review of evidence bases was really with relevance to checking during the LDP process. We recognise that nothing in policy will prevent future designated assets from being protected but the relevance was, for example with regard to changes to AAP or larger areas that might be pertinent to the local policies plan.

Page 282 – HED accept that the text summarised information from the LCA 2000, but would advise that landscape character assessments require update due to physical changes and new information which improves the quality of the assessments. We would advise that the spatial data now available through ourselves and others will greatly aid any future review of

the landscape character assessment in relation to the district. In some cases heritage assets will have had a very particular influence on landscape evolution and consequently should be identified in the assessment.