



Belfast City Council Local Development Plan 2035 – Plan  
Strategy  
MAG Response

# Belfast City Council Local Development Plan 2035 – Plan Strategy

## Ministerial Advisory Group (MAG) Response

12 | 11 | 18

By email to:

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

## 1.00 General

1.01 MAG, The Ministerial Advisory Group for Architecture and the Built Environment for Northern Ireland, was established in 2007 to advise the then Minister for Culture, Arts and Leisure, and now the Minister for Communities, on the implementation of the Architecture and Built Environment Policy.

1.02 MAG consists of a Chair and 5 Members, all of whom are independent professionals, appointed through the public appointments process. MAG is assisted by 21 Expert Advisors, independent professionals who, while they are not ministerial appointees, are appointed through the public appointments process.

1.03 MAG welcomes the opportunity to comment on the Draft Plan Strategy. This response has been prepared by [REDACTED], MAG Member.

## MAG Response

### 2.00 Tests for Soundness

2.01 Procedural conformity: No comment

2.02 Consistency: No comment

2.03 Coherence and effectiveness

MAG was pleased to partake in the council's Design and Heritage and Housing Working Groups, two of the groups established by the Council to develop the Draft Plan Strategy.

The Design and Heritage Working Group looked at issues within the LDP relating to design and heritage matters within the 'Shaping a liveable place' theme.

The meetings of the Design and Heritage Policy Working Group were held on 9th and 30th October, and 14th and 28th November 2017. Representatives were present from Belfast City Council, HED, RSUA, RTPI, Belfast Civic Trust, and PLACE. MAG was represented by [REDACTED] (first meeting) and [REDACTED].

Issues discussed included:

- Broad urban design criteria that will be taken into account in assessing new development

- Design quality in residential accommodation
- Supporting quality design vitality and function of arterial routes and city centre gateways
- Ensuring that new development promotes greater connectivity between places
- Consideration of tall buildings within the city in relation to their potential siting and broad design objectives
- Responding to specific issues which Belfast's heritage assets face now and are likely to face over the lifetime of the plan
- Identifying and safeguarding those characteristics that define the city's local distinctiveness which promote an individual sense of place and local identity
- Promoting an approach which facilitates high standards of energy efficiency in design both in terms of site layout and building design
- Promoting an approach which facilitates high standards of energy efficiency in design both in terms of site layout and building design

BCC Urban Design Policy and identifying and retaining Local Distinctiveness meeting 30th Oct 17

MAG comments on the draft policies were forwarded beforehand and fed into the discussion.

BCC Tall Buildings and Archaeology and Built Heritage meeting 14th Nov 2017

Issues regarding the impact of tall buildings in the city centre were discussed, in particular:

- The council's proposal to zone areas for tall buildings
- Merits of setting a stated height over which 'tall building' policy will apply
- Impact of tall buildings on the immediate vicinity and on the wider city views and skyline
- Desirability of creating mixed use tall buildings
- Siting and design objectives for tall buildings
- Issues which Belfast's heritage assets face now and are likely to face over the lifetime of the plan

BCC Energy Efficient design and Arterial Routes meeting 28th Nov 2017

MAG input to the meeting included:

- Benefits and consideration of energy efficiency issues relating to the re-use of existing buildings in comparison with new build
- Importance of ensuring buildings are designed in a considered way that ensures energy efficiency is inherent in **their design, rather than relying on less efficient 'add ons'** once a building is complete
- Ensuring proposals for arterial routes consider creation of a welcoming environment for pedestrians at street level
- Ensuring arterial route proposals promote a variety of uses and opportunities for urban repair
- Utilising vacant space above ground floor level
- Creating animated frontages to arterial routes

BCC Housing Policy Working Group meeting 23rd Nov 2017

Further to our work with the Design and Heritage Working Group, MAG was invited to attend the Housing Working Group on 23rd November. MAG input to the meeting focussed on:

- Ensuring homes are designed in a flexible way in order to **allow them to be adapted through their occupants' lifetime**
- Incorporating high quality design as a requirement for new homes
- Emphasising the desirability of mixed use housing and development
- Flexibility in required parking provision for re-used and city centre buildings
- Dependent on the proposal, flexibility in area of required private amenity space to ensure older buildings can be adapted for residential use
- Desirability of new housing to be placed in areas accessible to nearby amenities

We have received positive feedback from our involvement with Belfast City Council working group to develop the Design and Heritage policy for the Local Development Plan. We have also provided feedback on the workshop process and approach to the council upon their request.

## Belfast City Council LDP Draft Plan Strategy

Following positive feedback from our involvement with Belfast City Council, MAG was invited to attend two meetings in 2018 relating to the Draft Local Development Plan Strategy which was launched on 23rd August.

Meeting 1. Housing Workshop - Residential Design and City Centre Living 3rd September 2018

Attended by BCC, RSUA, NIHE, HED, MAG

New policy statements relating to Residential Design and City Centre Living were discussed. It is clear that the council has incorporated a significant number of comments MAG made at the working group stages in February this year. The council acknowledged this by thanking the group for their input.

Meeting 2. Urban Design and Built Heritage 10th September 2018

Attended by BCC, HED, RTPI, UAHS, MAG

This workshop reviewed the new policy guidance relating to Urban Design, Built Heritage and Tall Buildings. Again it is good to see that MAG's input at the working group stage has been incorporated in Belfast City Council's Urban Design Principles and strategic policy.

- 2.04 MAG believes that the above meetings and workshops, along with others held for relevant interest groups relating to the LDP, demonstrate that Belfast City Council gathered a robust evidence basis to support a draft policy/designation. The issues examined under the plan strategy build upon the themes discussed in the Preferred Options Paper and MAG's corresponding consultation feedback. Liaising with MAG and other relevant bodies ensures the policies are not only realistic, but well placed to be taken note of by those that will use them and be affected by them.
- 2.05 MAG wishes to support the LDP draft strategy and believes the council's approach considerably strengthens support for built and natural heritage, placing Urban Design as a strategic policy that is applicable to all new city proposals and development.

- 2.06 An urban design led policy framework is imperative to guide development and regeneration within the city centre, setting out overall place-making parameters.
- 2.07 Good high quality places, retaining cared for built heritage landmarks and historic streets, in conjunction with well-designed and judged new buildings, spaces and places, add considerable value to people's lives by providing them with a distinctive, uplifting environment, unique to them and their sense of place. This local distinctiveness is highlighted in the LDP. It is a positive legacy of the best of the past, embodying memory and story, is attractive to visitors (who love visiting places that are distinctive and different from their own), but most important of all it is a great place for local people.
- 2.08 As the council moves to develop its Plan Strategy into its new Local Policies Plan, MAG would like to offer support and encouragement so that the principals set out under the draft policy are not overlooked or diluted amongst the finer detail as it develops. Similarly it will be crucial that the principals set out under the draft Strategy are embedded in all supplementary planning guidance to be issued in the future. This will be particularly important when establishing criteria for tall buildings, or zoning areas for future development.
- 2.09 There is enormous scope in Belfast for innovative, creative, well-judged new development that will reinforce local identity and character whilst contributing to the heritage of the future. For this to occur excellent design quality is crucial - the draft Plan Strategy successfully embeds this as a policy requirement.

