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15th November 2018

Dear Sir/Madam

Belfast Local Development Plan: Draft Plan Strategy 2035

Background

The Historic Monuments Council is pleased to have the opportunity to comment on and respond to the Draft Plan Strategy. The Historic Monuments Council is a statutory council appointed to advise the Department for Communities on the exercise of its powers under the Historic Monuments and Archaeological Objects (NI) Order (HMAO) 1995. It is consulted by the Department in relation to policy, the Scheduling of Monuments, Monuments in State Care and the identification of Areas of Significant Archaeological Interest (ASAs). Membership of the Council is diverse, representing a wide range of public interests complemented by a number of senior archaeologists (including the Chair) with professional and heritage management expertise.

The comments of the Historic Monuments Council are made with specific regard for the statutory role of the Council as set out above. It should be noted that there are significant elements of the historic environment of Belfast, **such as the 'Samson and Goliath' gantry cranes** (scheduled monument - and illustrated in the draft Plan Strategy) which are protected under the provisions of the HMAO 1995.

General comments

The comments of the Historic Monuments Council are made in the context of the draft Plan Strategy guiding future investment and development decisions to enable the sustainable growth of the city up to 2035 and the vision of economic, social and environmental issues being holistically considered to deliver sustainable development. The Historic Monuments Council commends Belfast City Council on the production and clarity of the draft Plan Strategy. It notes and welcomes the approach of the draft Plan Strategy being to explicitly support the Belfast Agenda (Community Plan).

As a policy context for its comments and the relevance of considering Belfast as a dynamic, historic city the Historic Monuments Council thinks it is appropriate to make reference to the approach taken in the 2011 UNESCO *Recommendation on the Historic Urban Landscape* (HUL) and at a UK and regional level to the statutory role and position of the Historic Environment Division, Department for Communities.

The HUL approach emphasises that urban heritage is of vital importance for our cities as a source of social cohesion, providing factors of diversity and drivers of creativity, innovation and urban regeneration. This approach goes beyond the concept of preservation and focuses on the importance of the human environment. It aims to increase the sustainability of planning and design intervention by taking into account the historic and natural environment, intangible heritage, cultural diversity, socio-economic and environmental factors alongside local community values. The Historic Monuments Council would recommend that this integrated approach to urban heritage, which is hinted at in some points, should be integrated more fully into the text across the draft Plan Strategy. This should also be one of the policies covered in the accompanying Sustainability Appraisal.

Reflecting this shift towards a wider, integrated understanding of the contribution of historic fabric to the life and character of places, **the term 'historic environment'** is now consistently used in policy contexts in England, Scotland, Wales and Northern Ireland. In Northern Ireland recognition of the term historic environment at Government level is reflected specifically in the name of the relevant regulatory and advisory body: the Historic Environment Division, Department for Communities. In this context the Historic Monuments Council would recommend the term historic environment should be recognised and used in the draft Plan Strategy rather than **the term 'built heritage'**. The term is also appropriate given the reality that 30% of the area of Belfast City Council is rural in character and in recognition of the diverse character of the urban fabric of the city itself.

Specific comments

Chapter 1: Introduction

Under 1.1.2 Emphasis is placed on much of the character of the city being derived from the physical legacy of Victorian innovation and economic wealth. While this is the case, it is important that the draft Plan Strategy recognises the longer-term, dynamic history of the city which is reflected in its fabric and under the ground. This is detailed in Ó Baoill, R. 2011. *The Archaeological Story of Belfast: Hidden History Below our Feet* (NIEA).

Chapter 2: District Profile.

Under 2.3 Environmental it is important that the draft Plan Strategy explicitly states that the landscape setting of Belfast owes its appearance and much of its current character to human interaction with the environment, that it is a cultural as much as a natural landscape.

Chapter 3 : Policy context

In the context of a point made below the Historic Monuments Council notes the specific inclusion of the *Lagan Valley Park Local Plan 2005*, given that the quashing of the BMAP means that the Plan was re-instated as the statutory development plan for the Lagan Valley Regional Park (LVRP).

Under 3.3.6 and with the HUL approach in mind, The Historic Monuments Council **would suggest that the phrasing...*to strike an appropriate balance between the local distinctiveness of our built heritage and allowing for high quality innovative development...***could be usefully re-phrased to emphasise the point about maximising the benefits of the historic environment and seeing it as a catalyst for securing a sustainable future for the city.

Chapter 4: Vision, aims and objectives

This sets out four strategic aims. The historic environment is mentioned as an objective under the strategic aim of Shaping a liveable place but not under the other three and a particularly curious point is that it is not mentioned under Promoting a green and active place. The HUL approach would indicate that the historic environment should be seen as a vibrant element linking all four strategic aims. The Historic Monuments Council would strongly recommend that there is an integrated approach taken to considering the key role of the natural and historic environment in underpinning the four strategic aims.

Chapter 5: Strategic policies

The Historic Monuments Council welcomes the recognition in 5.0.5 that the quality of the environment in which we live, work and socialise plays a significant role in the health and well-being of individuals and communities.

Under 5.2.2 and in accordance with the HUL approach the Historic Monuments Council would recommend that alongside the Council protecting and enhancing the environment (historic and natural) it should also recognise the key role of that environment in development that is sustainable and attractive for communities and visitors. HMC recommends that the term historic environment should be specifically included in the definition of context to make the policy more sound.

The Historic Monuments Council welcomes the discussion under 5.5 Positive placemaking and would recommend that this approach underpin the draft Plan Strategy more broadly.

The Historic Monuments Council welcomes the promotion and encouragement of greenways and blueways in the draft Plan Strategy. However, in contrast to the integrated approach promoted under 5.5, it is disappointing that under 5.8 Green and Blue Infrastructure, and specifically in the discussion at 5.8.2, the critical role of the historic environment as an integral part of the spaces and connections that make up this infrastructure is not recognised. It is the view of the Historic Monuments Council that this weakens what is a potentially important strategy for the sustainable future of the city. As the attractiveness of greenways and blueways

has been widely recognised to be linked to the quality and character of both the natural and historic environment it is critical that a heritage-led approach is taken in their development. This would also ensure that heritage assets on greenways and blueways are identified and safeguarded to protect them and their settings, hence contributing to sustaining the quality of the environment and to social and economic activities. HMC recommends that the term historic environment should be specifically included in the definition and discussion to make the policy more sound.

Chapter 7: Shaping a Liveable Place

The Historic Monuments Council welcomes the discussion of the character of local distinctiveness under 7.2.8.

The Historic Monuments Council would specifically recommend that the heading of Section 7.4 should be titled Historic Environment. The Historic Monuments Council welcomes the general tone and direction of the discussion under 7.4, it wishes to make specific comments in relation to 7.4.29-40 under Policy BH5-Archaeology.

Under 7.4.29 it would appear that 'natural' is referred to rather than historic, this should be corrected.

Paragraphs 7.4.31-32 are written with reference to Archaeological Remains of Regional Importance. In this context the draft Plan Strategy refers to State Care and Scheduled Monuments. It is surprising and disappointing that there is a failure to recognise that under the HMAO and associated policy instruments – PPS 6 and the SPPS (Strategic Planning Policy Statement) Areas of Significant Archaeological Interest (ASAI)s are also recognised as being of regional importance. As is detailed in the *Lagan Valley Regional Park Plan (2005)*, and as part of that Plan, the then Department of the Environment, in consultation with HMC, designated the Giant's Ring at Ballynahatty and its immediate landscape setting as an ASAI to ensure the protection of this landscape area from inappropriate or damaging change.

Specific discussion of the Giant's Ring ASAI is appropriate for the Local Policies Plan document. With regard to the draft Plan Strategy the lack of reference to ASAI)s makes this section of the draft Plan Strategy unsound. The Historic Monuments Council strongly recommends that the policy can be made sound by including the term Area of Significant Archaeological Interest (ASAI) in the heading and text of 7.4.31, in line with articulation in the SPPS and the statutory plan evidence basis, in this particular case the LVRP Plan.

Chapters 8-10

In relation to these chapters that cover the strategic aims of Creating a vibrant economy (Chapter 8), Building a smart connected and resilient place (Chapter 9) and Promoting a green and active space (Chapter 10), the Historic Monuments Council would emphasise the need for the integrated HUL approach, promoted in the draft Plan Strategy itself at Section 5.5. A focus on the historic environment and its future development as having a substantial influence on the character and quality of Belfast and the need for participative placemaking and planning are central to the successful delivery of the draft Plan Strategy.

The Historic Monuments Council looks forward to continuing to engage with the Belfast Local Development Plan process.

Yours sincerely

