Belfast Local Development Plan

SA Post-adoption Statement May 2023

Sustainability Appraisal of the Plan Strategy 2035 Incorporating Strategic Environmental Assessment

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Sustainability Appraisal incorporating Sustainable Environmental Assessment Plan Strategy SA Post-Adoption Statement

1 Introduction

- 1.1 Belfast City Council adopted the Belfast Local Development (LDP) 2035 Plan Strategy on 02 May 2023.
- 1.2 During preparation of the Plan Strategy, the council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the LDP during its development.
- 1.3 As the SA of the Plan Strategy incorporates an assessment of environmental effects, it must comply with the requirements of the European Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (known as the SEA Directive). The SEA Directive was transposed into Northern Ireland legislation through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (EAPP (NI))¹. Regulation 15 of EAPP (NI) requires Belfast City Council to make the final SA Report available alongside the Adopted Plan Strategy.
- 1.4 The SA Report for the Plan Strategy; the 'Sustainability Appraisal of the Draft Plan Strategy 2035 Incorporating Strategic Environmental Assessment, Sustainability Appraisal Report August 2018' (hereafter referred to as the 'SA Report 2018') was published alongside the draft Plan Strategy (dPS) in August 2018. The plan and accompanying documents were subject to two periods of consultation; for the receipt of representations (September to November 2018) and counterrepresentations (March to April 2019) and were formally submitted to the Department for Infrastructure (DfI) in August 2019.
- 1.5 In December 2019 Dfl appointed the Planning Appeals Commission (PAC) to conduct an Independent Examination (IE) of the dPS, which was held over two sessions between November 2020 and March 2021. The PAC made its recommendations under section 10(8) of the Planning Act (Northern Ireland) 2011 (hereafter 'the Act') and presented these as recommended amendments as part of its report to Dfl in September 2021 in which it concluded the dPS was, subject to modifications, "sound".

¹ The Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004, Regulation 15

- 1.6 In February 2022, following consideration of the PAC report, the Dfl in exercise of the powers conferred on it by section 12(1)(b) of the Act issued a Direction to the Council. This directed the Council to address the requirements set out in Schedule 1 of the Direction, along with any necessary engagement and consultation, prior to formal adoption of the Plan Strategy.
- 1.7 The SA Addendum May 2022 (hereafter referred to as the 'First SA Addendum') considered the required modifications as set out in the schedule and concluded that they could be made without impacting or changing how the plan as a whole would perform against the SA Objectives. This was published for consultation alongside the council's Modifications Overview report between May and July 2022.
- 1.8 Following this period of consultation, the council concluded that further, minor amendments were needed to the detailed wording of draft Strategic Policy SP1A and its justification and amplification text. The Second SA Addendum April 2023 (hereafter referred to as the 'Second SA Addendum) considered the implications of these further revisions, and again concluded that they could be made without impacting or changing how the plan as a whole would perform against the SA Objectives. This was published for consultation and the consultation body confirmed that it agreed with the council's conclusions.
- 1.9 Following formal resubmission of the plan, the DfI subsequently issued a final Direction to the council in March 2023. This directed the council to formally adopt the draft Plan Strategy with the modifications as specified in the direction.
- 1.10 The final SA Report for the Adopted Plan Strategy therefore comprises the following documents:
 - Belfast City Council Local Development Plan: Sustainability Appraisal of the Draft Plan Strategy 2035, Incorporating Strategic Environmental Assessment:
 - o Sustainability Appraisal Report August 2018,
 - o SA Non-technical Summary August 2018,
 - o SA Addendum May 2022,
 - Second SA Addendum April 2023

- 1.11 The Northern Ireland Development Plan Practice Note 04 (DPPN 4)² provides councils with direct guidance on the SA process, and the preparation and production of SA reports.
- 1.12 Table 1.1 provides a summary of the specific SA procedural steps as set out in DPPN4. The current stages are highlighted in blue, while the second column signposts where information on each stage can be found.

² The Northern Ireland Development Plan Practice Note 04 (DPPN04)

SA Sta	ge	Location	
A (1)	SA Scoping Report		
1	Identify other relevant policies, plans, programmes & sustainability objectives		
2	Preparation of the evidence base		
3	Identify existing environmental issues and challenges	SA Scoping Report	
4	Establishing the SA Framework and objectives		
5	Consultation		
A (2)	SA Interim Report		
1	Assessment of preferred options and reasonable alternatives	SA Scoping Papart	
2	Consultation alongside Preferred Options Paper and SA Scoping Report	SA Scoping Report SA Interim Report	
В	Assessment		
1	Test the LDP objectives against the SA Framework		
2	Assessment of reasonable alternatives		
3	Assessment of likely evolution without the LDP	SA Scoping Report	
4	Evaluate likely significant effects of the draft plan and alternatives	SA Report 2018 SA Non-technical Summary 1 st SA Addendum	
5	Proposed mitigation measures for addressing adverse / beneficial effects		
С	SA Report & Addendums	2 nd SA Addendum	
1	Documents appraisal process, findings, including SEA Directive requirements		
D	Consultation on the SA Reports & Draft Plan Strategy	/	
1	Consult public, environmental authorities and any affected EU member state	August 2018 May 2022 March 2023	
E	SA Statement	This report	
1	Identify how the SA & consultations have been taken into account	Sections 3 – 5	
2	Reasons for choosing the plan as adopted	Section 6	
3	Proposed monitoring measures	Section 7	
F	Monitoring		
1	Establish arrangements to monitor significant effects of plan implementation	-	
2	Identify unforeseen adverse effects	-	
3	Undertake appropriate remedial action	-	

Table 1.1 Sustainability Appraisal Stages & Location of Details

2 **Requirement for the Adoption Statement**

- 2.1 Both Regulation 15 of EAPP (NI) and section 12 of DPPN 4 require that as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the responsible authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SA Statement' and must inform the public and consultation bodies about the availability of these documents. The SA Statement must explain:
 - a) how environmental considerations have been integrated into the plan,
 - b) how the environmental report has been taken into account,
 - *c)* how the opinions expressed by the public and consultation bodies during consultation on the plan and the environmental report have been taken into account,
 - *d) how the results of any consultations entered into with other European Member States (where appropriate) have been taken into account,*
 - *e) the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and*
 - *f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.*
- 2.2 As the SEA process was incorporated in the SA process for the LDP, and the environmental report was integrated within the SA Report, this document constitutes the SA Statement for the Plan Strategy. The document is organised according to the EAPP (NI) requirements listed above and reflects the following structure:
 - Section 3 summarises how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used,
 - **Section 4** summarises the links between the plan-making and SA/SEA processes and how the SA/SEA recommendations were taken into account,
 - Section 5 summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments,
 - Section 6 describes the alternatives/options considered as part of the plan preparation process and why certain options were chosen; and,
 - **Section 7** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.
- 2.3 This SA Statement has been prepared by Belfast City Council in accordance with:

- Sections 8(6) and 9(7) of the Planning Act (Northern Ireland) 2011,
- *Regulation 15 and 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015; and*
- The Environmental Assessment of Plans & Programmes Regulations (Northern Ireland) 2004 (EAPP).

3 How environmental & sustainability considerations have been integrated into the Plan Strategy

- 3.1 The SA (incorporating SEA) of the LDP process began in May 2016 with the production of a Scoping Report alongside the LDP timeline and the council's Statement of Community Involvement (SCI). This was followed by the SA Interim Report, which was published alongside the LDP Preferred Options Paper (POP) in January 2017. Although the Scoping Report was produced at the initial stage, it was considered to remain relevant for setting the scope of the SA work that was subsequently undertaken for the Plan Strategy.
- 3.2 The purpose of the SA was to assist the council in preparing the Plan Strategy by identifying the key sustainability and environmental issues that face the plan area; to predict what would be the likely effects of the plan on these issues and to put forward recommendations to improve the plan. The aim was to ensure that the Plan Strategy has as many positive effects as possible and that any significant negative effects are avoided or mitigated as reasonably possible alongside implemented policies, particularly those resulting in new development within the plan area.
- 3.3 The SA was undertaken iteratively, such that at each stage of the Plan Strategy's preparation, the sustainability including environmental effects of the options for the Plan Strategy were assessed. SA Reports were produced to describe the approach taken and to identify the likely effects of the plan. In this way, environmental and sustainability considerations were integrated into the Plan Strategy as it was developed.
- 3.4 The way in which the environmental and sustainability effects of the Plan Strategy were described, analysed and compared was through the use of a set of SA objectives. The SA Objectives for the Plan Strategy were developed during the scoping stage of the SA process, drawing on a review of relevant European, national and regional policies, plans and programmes and the objectives they contained, as well as a review of key sustainability issues in the area. The resulting SA 'Framework' comprised 19 SA Objectives, each with supporting decision-making criteria, which were used to decide whether the Plan Strategy would be likely to achieve each objective. This framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies of the Plan Strategy. Using the same SA framework ensured that reasonable alternatives were assessed in a comparable way as part of developing the Plan Strategy.

- 3.5 The Plan Strategy was also required to be subject to Habitats Regulations Assessment (HRA) under Regulation 43 of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)³. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Plan Strategy was undertaken separately from the SA but the findings of the HRA Reports informed the SA process, particularly in relation to judging the potential effects on SA Objective 10, '*Maintain & enhance biodiversity assets & protect habitats & species*'.
- 3.6 **Table 3.1** below presents the SA Framework for the Plan Strategy. The third column shows how the plan themes and SEA topics (listed in Schedule 2 of EAPP (NI)⁴ as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

³ Regulation 43 of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended).

⁴ EAPP (NI) Schedule 2: Information for Environmental Reports

Table 3.1: The SA Framework

SA	Objective	Decision-making criteria	SEA topics
1.	Reduce deprivation & encourage an inclusive & equal society	 Reduce deprivation and social exclusion, in particular in those areas most affected Encourage an inclusive and equal society Promote regeneration, reducing disparity with surrounding areas Increase the ability of people to influence decisions 	Population
2.	Improve health & wellbeing for an improved quality of life	 Encourage healthy lifestyles and provide opportunities for sport and recreation Support the reduction of health inequalities Improve physical and mental health Reduce noise levels and concerns Contribute to improving air quality Contribute to improving water quality Encourage access to ecological networks by encouraging green infrastructure, providing walking and cycle routes to heritage and other recreational places of interest 	Population Human Health
opportunity for good quality housing & enable people to meet their housing needs		 Increase access to affordable housing Encourage a range of dwelling type, size and tenure Reduce homelessness Improve housing quality Ensure the housing needs of an ageing population are met Reduce the number of vacant properties 	Population

SA (Objective	Decision-making criteria	SEA topics
4.	Increase community safety by supporting the reduction of crime & antisocial behaviour	 Support a reduction in the actual levels of crime Reduce the fear of crime Promote design out crime principles 	Population
5.	To improve skills & education of residents through providing high quality, accessible lifelong learning opportunities	 Improve access to high quality educational facilities Improve the level of investment in key community services Make access easier for those without access to a car Improve access to work experience, apprenticeships and training, especially young people Encourage affordable access 	Population
6.	Retain & enhance access to local services & facilities	 Encourage the level of investment in key community services Improve accessibility to key local services (schools, GP surgeries, hospitals, town, district and local centres) and employment opportunities Encourage affordable access Make access easier for those without access to a car Protect the shopping and community services function of local service centres 	Population
	ECONOMIC		
7. To ensure local residents have • Help to reduce short and long-term local unemployment Population access to employment opportunities • Encourage job opportunities for those most in need of employment particularly those is areas of high unemployment deprivation • Encourage job opportunities for those most in need of employment particularly those is areas of high unemployment deprivation • Encourage job opportunities		Population	

SA	Objective	Decision-making criteria	SEA topics
8.	Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver	 Encourage new business start-ups and opportunities for local people Encourage business development and enhance productivity Encourage the resilience of business and the local economy Promote growth in key sectors Promote growth in key clusters Enhance the image of the area as a business location Encourage indigenous business Encourage inward investment Make land and property available for business development Encourage tourism investment Maintain and enhance the vitality and viability of the City Centre 	Population
9.	 9. Promote an integrated transport system & encourage sustainable travel 9. Support the reduction of traffic volumes and congestion 9. Encourage the proportion of journeys using modes other than the car 9. Encourage walking and cycling 9. Support the reduction of commuting 9. Improve accessibility to work by public transport; walking and cycling 9. Improve access between key employment areas and key transport interchanges 9. Encourage rail and water-based freight movement 		Population Air Climatic Factors

SA (Objective	Decision-making criteria	SEA topics
10.	 10. Maintain & enhance biodiversity assets & protect habitats & species Conserve and enhance habitats of international, regional and/or local importance and create habitats in areas of deficiency Conserve and enhance species diversity; and in particular avoid harm to protected species Conserve and enhance sites designated for their nature conservation interest at the regional or national level Protect and enhance woodland cover and trees and promote their management Improve access to and promote the educational value of sites of biodiversity value Protect and enhance geodiversity Enhance the wider ecological network and seek to minimise the fragmentation of 		Biodiversity Flora Fauna
previously developed land and buildingsEnsure contaminated land is remediated as appropriate		 Ensure that, where possible, new development occurs on derelict; vacant and underused previously developed land and buildings Ensure contaminated land is remediated as appropriate Minimise the loss of soils to development and maintain and enhance soil quality Reduce the risk of subsidence 	Soil

SA Objective	Decision-making criteria	SEA topics
12. Protect, conserve & enhance the historic environment, heritage assets & their settings	 Protect and enhance Conservation Areas and other sites, features and areas of historical and cultural value Protect listed buildings and their settings Help preserve, enhance and record archaeological features and their settings Help to protect and enhance historic buildings through sensitive adaptation and reuse Enhance the quality of priority areas for townscape and public realm enhancements Protect and enhance local distinctiveness and sense of place Encourage and support the articulation of statutory requirements in relation to Scheduled Historic Monuments (i.e., requirement for consent), together with appropriate site zoning and policy preparation. Recognise and work to preserve and enhance the historic townscape Foster Heritage Led Regeneration Promote heritage based, sustainable tourism 	Cultural Heritage (Including architectural & archaeological) Material Assets
 Protect, maintain & enhance the quality of Belfast's distinctive landscape & geodiversity 	 Improve the landscape character and visual amenity of open spaces Protect and enhance sensitive landscapes Minimise visual intrusion and protect views 	Landscape

SA C	bjective	Decision-making criteria	SEA topics
14.	Protect & enhance open space & natural greenspace including Belfast's countryside asset	 Ensure adequate access to public open space within a reasonable walking distance from people's homes Promote access to green infrastructure and ecological networks Create new areas of open space and natural greenspace 	Landscape
15.	Promote the sustainable management of waste	 Lead to reduced consumption of materials and resources Encourage the reduction of household waste Support the increase waste recovery and recycling and improve facilities Support the reduction hazardous waste Support the reduction of waste in the construction industry 	Material Assets
16.	Promote the quality, efficient use of water resources	 Support the improvement of the quality of surface and ground water Encourage the reduction of water consumption and improve water efficiency Encourage the efficient use and management of water Incorporate sustainable urban drainage systems as part of the design where appropriate 	Water Material Assets
17.	Reduce air pollution & ensure continued improvements to air quality• Support the improvement of air quality• Help achieve the objectives of the Air Quality Management Plan • Reduce emissions of key pollutants		Air
18.	Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy	 Encourage renewable energy production Reduce emissions of greenhouse gases Support the development of a Circular Economy Support the digital economy Help to reduce our energy consumption 	Climatic Factors

SA Objective	Decision-making criteria	SEA topics
19. Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk		Climatic Factors

Sustainability Appraisal incorporating Sustainable Environmental Assessment Plan Strategy SA Post-Adoption Statement

4 How the SA Report (including SEA) has been taken into account

- 4.1 As already stated, the SA process for the LDP was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the plan's development.
- 4.2 The SA assessed each of the policies and proposals in the Plan Strategy and all reasonable alternatives to these, and this helped the council to formulate its approach with regards to which options to take forward. The reasons for selecting or not selecting each policy option were set out in Appendix 11 of the SA Report 2018, which includes considerations from the SA, as well as wider planning considerations.
- 4.3 Section 4 of the SA Report 2018 also includes a number of sections outlining the recommendations for the Plan Strategy made through previous iterations of the SA and how these were addressed throughout the plan making process.
- 4.4 Section 2 of the First SA Addendum explains which of the required modifications were screened in or out for SA appraisal, and the reasons for this, whilst Section 3 sets out how the detailed SA was subsequently undertaken by the council for those that were screened in. Appendix 2 of the addendum provides full consideration of reasonable alternatives and detailed assessment matrices of all options against the SA Objectives.
- 4.5 Section 2 of the Second SA Addendum sets out how the detailed SA was undertaken for the further revisions that were proposed to draft Strategic Policy SP1A and its justification and amplification text. Appendix 1 of the Second SA Addendum provides full consideration of reasonable alternatives and detailed assessment matrices of all options, including the revised policy, against the SA Objectives. Appendix 2 provides a comparative summary showing the revisions that were made to the policy.
- 4.6 **Table 4.1** shows how preparation of the SA Reports (which included the Environmental Report requirements) corresponded with each stage of the Plan Strategy preparation, and how the SA was taken into account.

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
Publication of LDP Timetable & Statement of Community Involvement, May 2016	SA Scoping Report, May 2016	 The scoping stage focussed on the key issues that the LDP should address or potentially affect: Identifying other relevant policies, plans and programmes, Compiling and presenting baseline information about the social, economic and environmental issues for the plan area as well as the policy context, Identifying sustainability objectives, opportunities and challenges, Assessing the likely evolution of existing conditions without the LDP, Establishing the SA Framework, setting out the SA objectives against which plan options initially, and subsequently policies, would be appraised
		This stage set the scope for the SA, rather than assessing any element of the Plan Strategy.
LDP Preferred Options Paper, January 2017	SA Interim Report, January 2017	The SA Interim Report was produced alongside the Preferred Options Paper (POP) which assessed the preferred options for the Plan Strategy. Appraisal of the POP directly informed the preparation and appraisal of the dPS in the following way:
		 Developing a stronger evidence base, SA Framework, and objectives, Establishing strategic options to achieve the aspirations and aims of the LDP, Scoping and appraising reasonable alternatives, Identifying preferred options through a detailed appraisal process, Assessing likely significant effects, Establishing mitigation and monitoring measures, Direct engagement, influence and consideration through consultation

Table 4.1: Iterations of the Belfast City Council Local Development Plan, Plan Strategy & accompanying SA work

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
		The council took full account of the assessment results and all consultation comments when preparing the dPS. Chapter 5 of the SA Interim Report outlined recommendations for ways in which to maximise the benefits of the LDP and minimise any adverse effects.
LDP Draft Plan Strategy, August 2018	SA Report, August 2018	The dPS set out the final detailed policies as informed from the previous stages. By identifying mitigation and enhancement measures to address impacts on social, economic and environmental factors, the SA directly influenced the council's decision making and preparation of the Plan Strategy:
		 Mitigation and enhancement measures are integral to promotion of sustainable development through the draft policies, Delivery of the Green & Blue infrastructure network is actively encouraged and promoted through the draft policies, and will continue through the Local Policies Plan, Policies have been strengthened or introduced to ensure suitable measures are in place to appropriately manage the impact of development, Criteria based policies have been worded to directly mitigate impacts on social, economic and environmental factors, and to control or restrict specific development to exceptional, criteria-based circumstances. This will be further emphasised through the Local Policies Plan, Flexibility has been introduced where required to ensure appropriate balance and avoid conflicting prejudice, Management plans, assessments and statements are a requirement of relevant policies to demonstrate suitable levels of protection, mitigation or enhancement for development proposals, Conditions, agreements and enforcement measures will manage impact and aftercare of specific proposals

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
		 Identified the need for Supplementary Planning Guidance to guide and facilitate the appropriate management of development throughout the plan area The SA also concluded that the Local Plan policies should go a long way towards mitigating the potential negative effects of the development proposed: Sustainable development will be encouraged to limit impact Careful attention will be given when designating, allocating and prioritising land to minimise impact and enhance integration Key site requirements will be applied and reflected in local policies Proposed policies will be further enhanced, and designations reviewed to ensure adequate protection and mitigation of potential effects identified at DPS stage Locational criteria will be applied where relevant to help direct new development to the most appropriate areas of the city
		As the Plan Strategy at this stage was a draft as proposed to be adopted, the purpose of the SA was to inform consultees and the PAC on the sustainability implications of the plan. Had any major issues been identified however, the council would have proposed modifications to the plan.

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
LDP Draft Plan Strategy Modifications Overview, May 2022	First SA Addendum, May 2022	Following the Independent Examination, the PAC advised that a number of modifications to the plan were required in order to make the plan legally compliant and sound. The First SA Addendum considered the implications of the required modifications (RMs) for the previous SA findings and highlighted the effects that they were likely to have with regards to the SA Report 2018. It concluded that the RMs could be made to the dPS without impacting or changing how the plan as a whole would perform against the SA Objectives. At this stage the role of the SA was to inform of the implications of the RMs, rather than to propose further changes to the plan. Had any major issues been identified however, further modifications could have been proposed.
LDP Draft Plan Strategy Post Independent Examination Consultation Report, April 2023	Second SA Addendum, April 2023	Following consultation on the Modifications Overview report and the First SA Addendum, the council concluded that through the Post Independent Examination Consultation Report, April 2023 that further, minor revisions were needed to the detailed wording of draft Policy SP1A and its justification and amplification text.
		The Second SA Addendum considered the implications of these revisions for the previous SA findings and highlighted the effects that they were likely to have with regards both the First SA Addendum and the original SA Report 2018. It concluded that the proposed revisions would retain a minor positive score following a review and detailed scoring of performance against the previous option published for consultation in the First SA Addendum. It also demonstrated that the revisions could be made without impacting or changing how the plan as a whole would perform against the SA Objectives.

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
		Again, the role of the SA at this stage was to inform of the implications of the proposed revisions, rather than to propose further changes to the plan. Had any major issues been identified however, further modifications could have been proposed.
		In line with the EAPP regulations Consultation Procedures, Part III, 12, the council published notice to the public and shared the Second SA Addendum with the consultation body. No objections were received from the public, and the consultation body confirmed that it was content with the conclusions presented within the addendum.
LDP Adopted Plan Strategy, May 2023	SA Post Adoption Statement (this document), May 2023	 Following formal resubmission of the plan, the Dfl, in exercise of the powers conferred on it by section 12(1)(b) of the Planning Act (Northern Ireland) 2011, subsequently issued a final Direction to the council in March 2023. This directed the council to formally adopt the draft Plan Strategy with the modifications as specified in the direction. In line with Regulation 15 of EAPP (NI) and section 12 of DPPN 4, this Statement has been prepared and made publicly available alongside the Plan Strategy and the SA Report 2018. The information set out within this Statement explains: <i>a)</i> how environmental considerations have been integrated into the plan, <i>b)</i> how the environmental report has been taken into account, <i>c)</i> how the opinions expressed by the public and consultation bodies during consultation on the plan and the environmental report have been taken into account, <i>d)</i> how the results of any consultations entered into with other European Member States (where appropriate) have been taken into account, <i>e)</i> the reasons for choosing the plan as adopted, in the light of the other reasonable
		<i>alternatives dealt with; and</i> <i>f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.</i>

5 How opinions of consultation bodies & the public have been taken into account

- 5.1 At each stage of the LDP's development, an SA Report was published alongside the plan document for consultation with the public and the consultation body. As per Regulation 4 of EAPP (NI)⁵, the consultation body in this instance is the Department, which includes:
 - Historic Environment Division (HED), Department for Communities, and
 - Northern Ireland Environmental Agency (NIEA), Department for Agriculture, Environment & Rural Affairs (DAERA)
- 5.2 Regulation 15 of EAPP (NI)⁶ and section 12 of DPPN 4⁷ requires the SA post-adoption statement to summarise how any opinions expressed by the public and the consultation body in relation to the SA have been taken into account. The LDP consultation stages and responses received relating to the SA documents are summarised below.

Scoping Report

- 5.3 The SA Scoping Report was the first SA document produced alongside the LDP Timetable and the council's SCI. The requirement of the Scoping Report was to set the criteria for assessment by bringing together baseline data and other relevant information, such as a review of up-to-date policies, programmes and plans (PPP). The Scoping Report is updated at each stage of the plan-making process and published alongside the relevant plan document.
- 5.4 It was first published for consultation with the public and the consultation body for a period of 5 weeks from 15 November to 20 December 2016. This provided the opportunity for consultees to comment on a number of issues, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the LDP and whether the baseline information and PPP review were appropriate and complete.
- 5.5 Appendix 25 of the Scoping Report provides full details of all consultation comments received in response to the Scoping Report and describes how each one has been addressed. In light of the comments received a number of amendments were made to

⁵ EAPP (NI) Regulation 4

⁶ EAPP (NI) Regulation 15

⁷ DPPN 4 Section 12

the baseline information, the PPP review, and the key sustainability issues during the preparation of the SA Interim Report for the POP.

5.6 As noted above, the baseline information and PPP review were subject to a general update at each stage of the SA and published for consultation alongside the corresponding SA Report to ensure that they took full account of all consultation comments received and to reflect the current situation in the Belfast area.

Preferred Options Paper & SA Interim Report (including updated Scoping Report)

- 5.7 With the basis for the SA established though the scoping stage, the council then began appraising the dPS, starting with the key strategic options. The results were presented through the POP, the SA Interim Report and the updated Scoping Report, which were published together for consultation with the public and the consultation body for a period of 12 weeks from 26 January to 20 April 2017.
- 5.8 The SA Interim Report assessment focussed on the strategic aspirations, aims and objectives of the LDP as set out in the POP. Section 4.5 of the SA Report 2018 clarifies the role played by the consultation process at this stage, and how it directly influenced the preparation of the dPS and informed the way in which the council undertook the SA. As detailed in paragraph 4.5.4 of the same report, one of the most significant impacts of the consultation process on the SA was a re-structure and strengthening of the SA Framework, which enabled a more effective and informative appraisal of the dPS.
- 5.9 The consultation process also allowed for wider and more effective appraisal and scoring of key policies, options and alternatives, and the Consultation Body highlighted a number of instances where policy effects could potentially differ from those which had initially been identified. Where such differences were highlighted, these were fully acknowledged and reflected when undertaking the SA of the dPS, and key policies and preferred options were updated or strengthened where required. In other instances, the mitigation measures offered for the preferred options were found to be lacking in suitable detail, which led to a more detailed approach when considering mitigation through the SA of the dPS. This included greater consideration and explanation as to how the mitigation measures can help avoid potential adverse effects.
- 5.10 In addition to identifying areas for improvement or strengthening, support was also received from the Consultation Body on a number of key principles. Such support was strongly welcomed, and the council continued to promote and endorse these principles through the Plan Strategy.

- 5.11 All of the comments received in response to this consultation stage are presented in full in Appendix 9 of the SA Report 2018, along with how the council responded to each. This includes full details of where changes were made, and records where any aspect of the LDP or SA had been influenced as a result of the consultation process.
- 5.12 Paragraph 4.5.6 of the SA Report 2018 also detailed the strong influence that the consultation process has had on the scoping information that supports the LDP and the SA. Table 16 in Section 4 of the report highlights the key aspects which evolved and were updated or specifically addressed as a direct result of consultation.
- 5.13 Full details of comments received at that stage on the updated Scoping Report are presented in Appendix 1 of the SA Interim report and Appendix 25 of the Scoping Report, which again describes how each was addressed. As before this resulted in the scoping information being expanded and improved to capture elements that were previously over-looked or lacking in strength, and updates to baseline information and the PPP review.

Draft Plan Strategy & Sustainability Appraisal Report (including updated Scoping Report)

- 5.14 In line with the council's SCI, the dPS and all supporting evidence was made available four weeks in advance of the statutory 8-week consultation period. The dPS was therefore published on 23 August 2018, with the formal consultation period running from 20 September 2018 to 15 November 2018.
- 5.15 Following the consultation period, a copy of all of representations were published on the council's website and made available for inspection at the council's office. The council's Public Consultation Report August 2019, which formed part of the formal submission of the dPS to the Department in September 2019, summarises the consultation process that was undertaken in accordance with the SCI and the Planning (Local Development Plan) Regulations (NI) 2015. Along with a summary of the key issues raised through the consultation process, Section 4 also provides full details of all responses received to the dPS and how each one was addressed by the council.
- 5.16 The majority of comments received related to the soundness of the dPS. Over one third of all issues related to the 'Shaping a liveable place' section, with around two thirds of those issues relating to the housing and residential design policies. A number these related to the strategic policies and growth aspirations of the plan being too ambitious and unrealistic, most notably draft Policy SP1. Issues were also raised in relation to transportation, infrastructure and environmental resilience policies, as well as retail, economic development policies, open space provision, landscape, coast, and development in the countryside. A small number of comments also related to the

overarching vision, aims and objectives, the settlement strategy and the delivery sections.

- 5.17 A small number of consultees raised concerns directly relating to the SA process and how the SA findings were taken into account by the council. The majority of these questioned whether the evidence data, baseline information and PPP review were sufficient, complete, appropriate or suitable for the purposes of the plan. Some respondents suggested that the SA Framework and objectives were incoherent and insufficient, which results in inaccurate policy appraisals, identification of alternatives, and policy scoring within the appraisal. Particular note was made in relation to the lack of sufficient evidence to support the appraisal of certain draft policies, such as tall buildings. Concerns were also raised in relation to mitigation measures and proposed monitoring. Comments of support of the SA were also received, in particular the promotion of equality of opportunity and good relations as a key objective and general theme throughout both the dPS and the SA.
- 5.18 Section 5 of the Public Consultation Report August 2019 provides full details of all comments received in direct response to the SA, along with how the council addressed each. On review of each, the council concluded that none of these had material implications for the SA, therefore no further SA work was required at this stage.

Modifications Overview consultation & SA Addendums

- 5.19 The Draft Plan Strategy Modifications Overview May 2022 and accompanying SA Addendum May 2022, which considered the implications of required modifications for the SA, were published for consultation for an eight-week period from 12 May to 07 July 2022.
- 5.20 The council's Post Independent Examination Consultation Report April 2023 details the responses received and provides a summary of the key issues raised through the consultation process. Of those comments received, the majority related to the proposed Strategic Policy SP1A, whilst a small number related to the proposed amendments to Policy HOU1. Only one respondent provided comments directly relating the First SA Addendum, which disagreed with the appraisal scoring and conclusions reached by the council.
- 5.21 Having considered all the responses received through this consultation process, the council concluded that further, minor amendments were needed to the detailed wording of draft Strategic Policy SP1A and its justification and amplification text. The Second SA Addendum April 2023 considered the implications of these revisions for the previous SA findings and highlighted the effects that they were likely to have with regards to both the First SA Addendum and the SA Report 2018.

- 5.22 In line with the EAPP regulations⁸ Consultation Procedures, Part III, 12., the council published notice to the public and shared the Second SA Addendum with the consultation body from 03 March to 03 April 2023. The consultation body subsequently confirmed that it was content with the conclusions presented in the addendum, and that the proposed revisions to draft Policy SP1A and its J&A are not likely to have significant environmental effects. No comments were received from members of the public in response to the consultation.
- 5.23 All relevant documents and consultation responses received were sent to the Department for consideration as part of the council's final submission for formal adoption of the Plan Strategy.

Consultation summary

- 5.24 At each stage of the plan making process the council fully considered and took account of all consultation responses. Page 91 of the SA Report 2018 summarises the key areas in which the consultation process has directly informed and influenced the SA of the Plan Strategy, which includes:
 - Stronger links to the Belfast Agenda,
 - A more thorough and substantial evidence base and scoping data,
 - A stronger and more effective SA Framework and Objectives,
 - Improved accuracy of policy effect appraisals,
 - Increased consideration of mitigation measures; and
 - Support for key principles that will be further endorsed through future stages.

⁸ EAPP (NI) Regulation 12

Sustainability Appraisal incorporating Sustainable Environmental Assessment Plan Strategy SA Post-Adoption Statement

6 Why the adopted Plan Strategy was chosen in light of reasonable alternatives

6.1 The development of the dPS focussed on identifying the key aspirations and strategic aims of the LDP. As part of this process, the purpose of the SA was to identify and appraise the key policy options and reasonable alternatives with a view to not only make the LDP more sustainable and responsive to its social, economic and environmental effects, but to identify the potential for significant impacts and ways to minimise any negative effects. The stages that were involved in assessing and refining the plan options are summarised below.

Identification & appraisal of policy options

- 6.2 The POP provided the basis for consulting with the public and stakeholders on a series of options for dealing with key issues within the plan area. Those options were subject to SA at that time, with the findings described in the SA Interim Report 2017, which included a description of how the assessment was undertaken including any difficulties encountered in compiling the information.
- 6.3 Reasonable alternative for those options were identified by the council and were drawn from the most up-to-date evidence and guided by the national level policy set out in the SPPS. The appraisal of reasonable alternatives against the sustainability issues provided a sound evidence base to justify the decision-making process around the preferred options.
- 6.4 The findings set out in the SA Interim Report directly informed the council's preparation and decision-making about which of the preferred options to take forward into dPS policies, along with other factors. The council took full account of the findings of all previous stages of SA work when producing the dPS.
- 6.5 In preparing the dPS the detailed draft policies were again subject to SA, with the findings presented the SA Report 2018. The appraisal for reasonable alternatives for the dPS followed the same methodology as that used for the POP options, but the range of reasonable alternatives considered were now within the context of the council's preferred options. This allowed the focus to remain on the strategic options and policies for delivering the objectives of the plan.
- 6.6 Changes to the plan as a result of the SA were identified at various stages throughout the plan-making process, and the SA work for the dPS policies was updated as appropriate to reflect where this was the case. Such changes are fully documented and explained within the SA Report 2018.

6.7 Changes to the plan that arose as a direct result of the independent examination and the subsequent post examination consultation process have been fully considered through the SA process, as documented and explained within the First SA Addendum and the Second SA Addendum.

7 How will the environmental & sustainability effects of the Plan Strategy be monitored?

- 7.1 Regulation 17 of EAPP (NI) Regulations states that 'The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.'⁹ Schedule 2 requires that the environmental report shall provide a 'description of the measures envisaged concerning monitoring in accordance with regulation 17'.¹⁰
- 7.2 The Department's latest SA Guidance in DPPN4 echoes this requirement in paragraph 12.2 where it states that the post-adoption SA statement must include *'the measures to be taken to monitor the significant environmental effects of the implementation of the plan'.*¹¹
- 7.3 Monitoring will allow the actual significant effects of the implementing the plan to be tested against those predicted in the SA. It should focus upon the likely significant effects identified by the SA that may give rise to irreversible damage or where there is uncertainty, and it will also help the council identify any unforeseen adverse effects at an early stage and implement the necessary remedial action.
- 7.4 The monitoring measures proposed in this SA Statement are therefore clearly linked to the SA process, relating directly to those SA Objectives in the SA Framework for which likely or uncertain significant positive or negative effects were identified through the SA Report 2018, the First SA Addendum and the Second SA Addendum. The mitigation measures which have been included were specifically chosen to offset or reduce the significant adverse effects identified.
- 7.5 **Table 7.1** sets out the indicators for monitoring the potential significant effects of implementing the Plan Strategy. Where possible, they derive from those listed in the draft monitoring framework that was prepared by the council and presented in the draft Plan Strategy (Chapter 11.2 and Appendix F) and the SA Report 2018 (Chapter 6, Table 33).
- 7.6 As required by Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015¹², the council will produce an annual monitoring report, which may also include the findings of monitoring likely significant effects as a result of implementing the plan.

⁹ EAPP (NI) Regulation 17

¹⁰ EAPP (NI) Schedule 2

¹¹ DPPN 4, 12.2

¹² The Planning (Local Development Plan) Regulations (NI) 2015 Regulation 25

7.7 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations can also be used as a source of indicators. The council will therefore continue the dialogue that has already been commenced with statutory environmental consultees and other stakeholders; and will work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up-to-date and reliable.

Ref	Indicator	Source	Relevant policy	Target	Trigger
1	Population Change	Census, Mid-year population estimates (NISRA)	SP1	Over 400,000 people by 2035	Population growth more than 10% above/below projections
2	Net additional employee jobs	Job statistics (NISRA Quarterly Employment Survey)	SP1	46,000 additional jobs by 2035	Additional jobs more than 10% above/below projections
3	Net additional employment floorspace	Annual Employment Land Monitor (BCC)	SP1 EC2	550,000 m ² net additional B Use Class floorspace by 2035: 330,000m ² in City Centre 83,000m ² in Belfast Harbour Major Employment Area 138,000m ² in rest of city	Employment floorspace completions more than 10% above or below the average yearly forecasted demand of 36,500 (B class uses)
4	Net additional dwellings	Housing Monitor (BCC)	SP1 HOU1	31,660 by 2035 2020-25 – 1,100-1,300 dwellings per annum 2025-30 – 2,100-2,300 dwellings per annum 2030-35 – 2,700-2,900 dwellings per annum	Provision falls to level below 5-year available supply
5	Number of windfall units	Housing Monitor (BCC)	HOU1 HOU2	2,000 by 2035 2020-25 Total 400 – 80 per year 2026-30 Total 700 – 140 per year 2031-35 Total 900 – 180 per year	Windfall figures more than 10% above/below targets

Table 7.1: Monitoring Framework for the Plan Strategy

Ref	Indicator	Source	Relevant policy	Target	Trigger
6	% net additional units on previously developed land	Housing Monitor (BCC)	HOU2	100% of new units on previously developed land	Delivery falls below 60% 2020-35 (RDS target)
7	Average density of approved residential developments	Housing Monitor (BCC)	HOU4	Average densities for new residential developments in the character areas are within the relevant average density band	Average densities within a Character Area fall outside of broad density bands
8	Number of affordable homes approved / commenced / completed	Housing monitor (BCC) and NI Housing Statistics (DfC)	HOU5	Affordable housing at least 20% of all new housing built	Average affordable housing in the district more than 10% above/below target
9	Number of dwellings by type in Belfast	NI Housing Statistics (DfC), Housing Monitor (BCC) and monitoring planning applications (BCC)	HOU6	Total housing stock by 2035: 30% no. of apartments/flats 70% no. of houses	Number of apartments/flats approvals less than 20% or more than 40%
10	Number of dwellings approved by size (number of bedrooms)	Housing Monitor (BCC) and monitoring planning applications (BCC)	HOU6	40% of all dwellings 1 or 2-bed 60% of all new dwellings with 3 or more bedrooms	No of 1 or 2 bed dwellings less than 30% or more than 50%

Ref	Indicator	Source	Relevant policy	Target	Trigger
11	Number of HMOs in Policy Areas	NIHMO License Register (BCC)	HOU10 HOU11	Less than 20% HMOs, approved HMOs and conversions / sub-divisions within	No of HMOs, approved HMOs and conversions / sub-divisions within
12	Number of planning approvals for HMOs	Monitoring planning applications (BCC)		each Policy Area Less than 10% HMOs, approved HMOs	exceeds 20% within a Policy Area No of HMOs, approved HMOs and
13	Number of units with planning approval for apartments created through conversion/sub-division	Monitoring planning applications (BCC)		and conversions / sub-divisions within a 600m stretch	conversions / sub-divisions within exceeds 10% within a 600m stretch of street
14	Number of Buildings at Risk	Built Heritage at Risk Northern Ireland (UAH/HED)	BH1 - 4	Less than 10 % of listed buildings at risk removed from BHARNI Register due to demolition over 5-year period	More than 10 % of listed buildings at risk demolished over 5-year period
15	Quality of Conservation Areas and Areas of Townscape Character (ATCs)	Periodic review of Conservation Areas and ATCs (BCC)	BH2- 4	Protection of the designated Conservation Areas and Areas of Townscape Character	Loss of designations' geographic area recommended by a boundary review of these designation from the date of plan adoption
16	Number of demolitions in Conservation Areas and Areas of Townscape Character (ATCs)	Planning and appeal decisions (BCC)	BH2- 4	Less than 30% of refused demolition applications in Conservation Areas and Areas or Townscape Character allowed at appeal	No of appeals for demolition applications in Conservation Areas or Areas of Town Character allowed at appeal exceeding 30%

Ref	Indicator	Source	Relevant policy	Target	Trigger
17	Number of trees felled in Conservation Areas	Monitoring treeworks applications (BCC) for tree felling approvals; Monitoring planning enforcement numbers (BCC) of unauthorised tree felling	BH2 TRE1	Reduction in enforcement cases against unauthorised tree removal in Conservation Areas	More than 10% rise in unauthorised tree felling in Conservation Area
18	Number of sites of archaeological interest recorded in new developments	Planning approvals (BCC)	BH5	Less than 10% of sites of archaeological interest unrecorded in new developments	More than 10% of sites of archaeological interest unrecorded in new developments
19	Quantity and location of light industrial, industrial storage and distribution uses	Monitor floorspace of planning approvals via Employment Land Monitor (BCC)	EC3	No light industrial, industrial storage and distribution uses outside of MEL, SEL and existing employment areas	1 or more planning approvals for light industrial, industrial storage and distribution uses outside of MEL, SEL and existing employment areas
20	Quantity of zoned employment land	Planning decisions (BCC) via Employment Monitor	EC4	No zoned employment land lost to non-employment uses.	More than 10% of the overall quantum of employment land approved for non- employment related use on zoned employment land
21	Amount of approved office floorspace	Planning decisions (BCC) via Employment Monitor	EC6	None over 400m ² outside of the city centre None over 200m ² within Queens Office Area for Use Class B1 (a) and A2 None over 400m ² within district and local centres for Use Class B1 (a) and A2	 1 or more planning approvals exceeding 400m² outside of the City Centre 1 or more planning approvals exceeding 200m² 1 or more planning approvals exceeding 400²m

Ref	Indicator	Source	Relevant policy	Target	Trigger
22	Number of retail/main town centre planning applications approved	Planning decisions (BCC) via Retail Monitor and City Centre Retail	RET2	None over 1000 ² m outside City Centre	1 or more planning approvals for retail/town centre exceeding 1000m ² outside the City Centre
		Survey	RET3	None over 500m² (convenience) local centres	1 or more planning approvals for convenience retailing approvals exceeding 500²m in local centres
				None over 200m² (comparison) local centres	1 or more planning approvals for comparison retailing approvals exceeding 200m ² in local centres
				None over 300m ² (convenience) in areas of retail warehousing	1 or more planning approvals for convenience retailing approvals exceeding 300m ² in areas of retail warehousing
				No bulky comparison floorspace under 700m² in areas of retail warehousing	1 or more planning approvals for bulky goods under 700m ² in areas of retail warehousing
			RET4	Less than 30% floorspace to the sale of non-bulky comparison goods in areas of retail warehousing	1 or more planning approvals for development of less than 70% floorspace of bulky goods
23	No. of non-retail planning applications approved in Primary	Planning decisions (BCC) via Retail Monitor and City Centre Retail	RET5	No more than 40% non-retail No more than 3 adjacent units non- retail along the Primary Retail Frontage	Any further streets rising above the 40% non-retail 1 or more planning approvals resulting
	Retail Frontage	Survey			in 3 or more adjacent units in non-retail use

Ref	Indicator	Source	Relevant policy	Target	Trigger
24	Quantity of development permitted in undeveloped areas of flood risk	Planning decisions (BCC) and Dfl Rivers consultations	ENV 4	No permissions granted for non- compatible development in undeveloped flood risk areas and contrary to Dfl Rivers advice	1 application permitted in any year for non-compatible development in undeveloped flood risk area contrary to Dfl Rivers advice
25	Quantity of development permitted on all Natural Heritage Sites	Planning decisions (BCC) and liaising with NIEA	NH1	No permissions granted for non- compatible development in designated natural heritage areas and contrary to NIEA advice	1 or more permission in any year for non-compatible development on designated natural heritage areas contrary to NIEA advice
26	Number of planning permissions granted on zoned Open Space	Planning decisions (BCC) and liaising with CNS	OS1	To limit the net loss of zoned open space for uses other than those ancillary or compatible with open space use	Net loss of significant area of zoned open space to non-compatible / ancillary uses
27	Number of planning permissions that secure Green and Blue Infrastructure improvements, including through Developer Agreements.	Major planning decisions (BCC) and S76 Agreements	SP8 GB1	75% major permissions contributing to Green and Blue Infrastructure improvements	Less than 50% of major planning permissions providing for Green and Blue Infrastructure improvements
28	The number of planning permissions granted to incorporate SuDs measures in development proposals.	Major planning decisions (BCC)	ENV 5	75% major permissions contributing to providing SuDs measures	Less than 50% of major planning permissions providing for SuDs measures

Ref	Indicator	Source	Relevant policy	Target	Trigger
29	The number of applications granted for renewable energy development.	Monitoring planning decisions (BCC)	ITU 4	An increase in the number of renewable energy schemes	No increase in renewable energy facilities
30	Amount of municipal waste reduced and recycled	Northern Ireland local authority collected municipal waste management statistics (DAERA)	WM1 WM2 WM3	Meet targets outlined in the council's waste management plan	Targets in Councils Waste management plan not met
31	Proportion of journeys by sustainable modes - active travel, bus, rail and BRT	Travel Survey for Northern Ireland (Dfl)	TRAN1 TRAN3 - 5 TRAN9	An increase in the proportion of journeys made by sustainable modes	Reduction in the proportion of journeys made by sustainable modes
32	Number of new dwellings permitted annually outside settlement limits	Planning decisions (BCC) and Housing Monitor	DC policies	To sustainably manage the number of new dwellings in the countryside	Permission for 5 or more new (additional) dwellings outside the settlement limits
33	Number of non- residential proposals permitted annually outside settlement limits	Planning decisions (BCC)	DC policies	To sustainably manage the amount of new non-residential development in the countryside	Permission for 5 or more new development proposals (non-residential) outside the settlement limits
34	Trees	Liaison on a periodic basis with DM for policy implementation monitoring (BCC)	TRE1	To achieve net gain in overall number of trees through new built development	N/A - Consideration of policy implementation outcomes through regular liaison with DM

Ref	Indicator	Source	Relevant policy	Target	Trigger
35	Landscape change	Planning decisions (BCC) & liaison on a periodic basis with DM for policy implementation monitoring.	LC1-LC4	To protect and, where appropriate, improve the quality of the landscape within the city and its setting	N/A - Consideration of policy implementation outcomes through regular liaison with DM
36	Belfast Hills	Planning decisions (BCC) & liaison on a periodic basis with DM for policy implementation monitoring. <i>Other indicators remain</i> <i>relevant, including,</i> <i>MI26, 33 & 34</i>	LC1D	To protect and, where appropriate, improve the quality of the landscape of the Belfast Hills whilst providing for appropriate access and enjoyment	Countryside Policy triggers will be used. In addition, consideration of policy implementation outcomes through regular liaison with DM
37	Community & health	Planning decisions (BCC) & liaison on a periodic basis with DM for policy implementation monitoring	SP3 HC1 CI1	To protect existing community infrastructure and support appropriate further provision at accessible locations	N/A - Consideration of policy implementation outcomes through regular liaison with DM

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Ref	Indicator	Source	Relevant policy	Target	Trigger
38	Environmental Resilience	Planning decisions (BCC) & liaison on a periodic basis with DM for policy implementation monitoring	SP6 ENV2 ENV3	To ensure new developments help mitigate and can adapt to climate change	N/A - Consideration of policy implementation outcomes through regular liaison with DM
39	No. and location of bed spaces in Purpose Built Managed Student Accommodation (PBMSA)	Monitoring planning applications (BCC)	HOU12	PBMSA in close proximity (1200m) of further or higher education campus and outside of established residential areas	More than 10% of bed spaces further than 1200m from further or higher education campus or within established residential areas
40	No. and location of short-term let properties	Monitoring planning applications (BCC), enforcement cases (BCC), & Tourism NI Certification	HOU10 HOU11 HOU13	Minimise the number of short-term lets within a designated Housing Management Area (HMA)	More than 10% increase in the no. of short term lets within any HMA

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