



Belfast Local Development Plan

Second SA Addendum April 2023

Sustainability Appraisal of the Draft Plan Strategy 2035
Incorporating Strategic Environmental Assessment

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Executive Summary

This document comprises a **Second SA Addendum** to the **Sustainability Appraisal (SA) Report August 2018**, one of the plan documents prepared for Belfast City Council's draft Plan Strategy for the Local Development Plan 2035. It should be read in conjunction with the **SA Report August 2018** and the **SA Addendum May 2022**.

In February 2022 the Department for Infrastructure (DfI) issued a direction to the council which required the council to address a number of required modifications to the draft Plan Strategy (dPS) in order for it to be considered 'sound'. To fulfil the obligations of the direction the council undertook a public consultation process which sought views on proposed additions and changes to the dPS and the SA Addendum May 2022.

In response to the representations made as part of this consultation, the council has made a number of changes to **Strategic Policy SP1A** and its supporting justification and amplification text.

This Second SA Addendum provides a full appraisal of these changes through the SA process, with the findings set out in **sections 2** and **3**.

This report highlights the effects that the changes have had in regard to the appraisals carried out in both the SA Addendum May 2022 (referred to hereafter as the 'First SA Addendum') and the initial SA of the dPS (referred to hereafter as the '2018 SA Report').

It demonstrates that the revisions to the policy can be made without impacting or changing how the plan as a whole would perform against the SA Objectives.

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1. Introduction

Independent examination of the draft Plan Strategy

- 1.1 Following an independent examination in 2020/2021, the Planning Appeals Commission (PAC) produced a PAC Report of the dPS which concluded that, subject to modifications, the plan was considered to meet the relevant tests of soundness. DfI issued a direction to the council in February 2022 which directed it to address the required modifications as set out in Schedule 1 of the Direction, along with any necessary engagement and consultation, prior to formal adoption of the Plan Strategy.

Post-examination modifications & consultation

- 1.2 To fulfil these obligations the council was required to undertake public consultation in relation to changes considered necessary to address the modifications referenced as MOD05, MOD06 and MOD11. In proposing these changes, the council also assessed the potential implications in respect of the associated dPS documentation, including the SA, and determined that an addendum to the SA Report 2018 was required to appraise the modifications through the SA process and highlight the effects that the modifications had in regard to the initial SA of the dPS. Accordingly, the council sought views on proposed additions and modifications to the dPS and the First SA Addendum through a formal consultation period from **12 May to 07 July 2022**.
- 1.3 The council's **Post Independent Examination Consultation Report October 2022** provides a summary of the key issues raised through the consultation process. It should be read alongside a number of background documents, which have been added to the [Post Examination Modifications](#) section of the Local Development Plan (LDP) Document Library on the Belfast City Council website.

Proposed changes to Strategic Policy SP1A

- 1.4 In response to the representations made as part of this consultation, the council has made a number of changes to **Strategic Policy SP1A** and its supporting justification and amplification text.

- 1.5 Any modifications to the dPS have the potential to change the appraisal of likely effects on social, economic and environmental interests. The revised Strategic Policy SP1A therefore requires further consideration through the SA and SEA process in order to highlight the effects that the changes may have in regard to the appraisals carried out in the First SA Addendum, and to determine if they alter the 'likely significant effects' predicted in the 2018 SA Report or if they may result in new likely significant effects.
- 1.6 This document therefore looks to identify whether, as a result of the proposed changes to the policy, the outcomes of the first addendum should be varied from those originally reported. As such, whilst this addendum is a full SA of the revised Strategic Policy SP1A, it should still be read in conjunction with both the First SA Addendum and the 2018 SA Report.
- 1.7 **Appendix 2** to this addendum clarifies the proposed revisions to the policy and should be read alongside the council's **Post Independent Examination Consultation Report April 2023**, which provides a summary of all key issues raised through consultation and outlines the detailed reasoning for the proposed revisions to the policy and its supporting text.

Statutory Requirements

- 1.8 The SA must assess the social and economic effects of the LDP as well as the environmental effects. It therefore must comply with EU SEA Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (SEA Directive). The SEA Directive is transposed into Northern Ireland legislation through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP(NI) Regulations).
- 1.9 This Second SA Addendum to the SA Report August 2018 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).*

2 Detailed assessment of changes to revised Strategic Policy SP1A

2.1 The proposed changes to Strategic Policy SP1A are fully documented in the council's **Post Independent Examination Consultation Report October 2022**.

2.2 The detailed SA of revised Strategic Policy SP1A is set out in full in **Appendix 1** to this addendum.

Reasonable alternatives & preferred option

2.3 **Narrative Table A1** in **Appendix 1** sets out the council's consideration of reasonable alternatives.

2.4 This clarifies that when carrying out the First SA Addendum, the council appraised the sustainability impacts of two policy options.

2.5 '**Option 1**' reflected an interpretation of the approach suggested in paragraph 3.42 of the PAC Report. Within this the PAC offered a form of wording based on the need for a strategic policy on phasing. Whilst there was no need to replicate the wording, for the purpose of this exercise, the policy option was assessed based on the form of wording provided in paragraph 3.42.

2.6 '**Option 2**' represented the council's response and was a strategic policy which had a similar effect to the PAC's form of wording, but with more flexibility in-built, referring to existing provisions within the broader draft Plan Strategy (most notably Policies EC2 and HOU1) and the need for phasing within the Local Policies Plan (LPP).

2.7 The results documented in the First SA Addendum determined that **Option 2** performed better and resulted in a likely positive SA score. It was therefore selected as the council's **preferred option** at that time.

2.8 Following the consultation process a number of changes have now been made to Strategic Policy SP1A. This revised version, referred to as '**Option 3**', builds on the previous text of Option 2 to provide greater clarity in relation to the 'first phase' in advance of LPP, as well as work 'beyond this first phase'.

- 2.9 Option 3 has now been fully appraised as a further, reasonable alternative to Option 2. For full transparency the initial appraisal of Option 1 and Option 2 has been included for comparison alongside the appraisal of Option 3.
- 2.10 The assessment scoring used the effects identified reflect the same methodology and formulas as used in the First SA Addendum. These are provided again in **Figures 2 – 5** of **Appendix 1**.

Detailed appraisal

- 2.11 The detailed SA of Option 3 includes the relevant assessment matrices against the SA Objectives. This is set out in **Table A2** in **Appendix 1**.
- 2.12 Subsequent assessments were then carried out to determine the total policy score and the total effects of the revised policy against the SA Objectives. These are set out in **Tables A3 – A7** in **Appendix 1**.
- 2.13 Finally, it was determined how the policy would sit alongside the remainder of the dPS policies; and whether its introduction would influence or impact the effects of the plan as a whole against the SA Objectives. This is provided in **Table A8** of **Appendix 1**.
- 2.14 **Table 1** below provides a full summary of the detailed work in **Appendix 1**, alongside the subsequent conclusions and outcomes.

Table 1: SA summary of revised Strategic Policy SP1A

Consideration of reasonable alternatives	
Summary	Outcome of appraisal
<p>Clarifies where reasonable alternatives were identified for the policy option, and if not, the reasons why they were scoped out. Includes:</p> <ul style="list-style-type: none"> • Reasons for alternatives considered • Detailed consideration of social, economic & environmental effects of proposed policy and reasonable alternative • Reasons for choosing preferred option • Mitigation • Timescale of effect 	<p>For the reasons set out in the First SA Addendum, 'No policy' was <i>not considered a reasonable alternative</i> and was scoped out from the outset. Two options were then identified as being reasonable alternatives:</p> <ul style="list-style-type: none"> • Option 1; 'Prescriptive phasing policy' reflects the PAC's suggested wording in paragraph 3.42 of the PAC Report and envisages a strict separation of land into specific phasing. • Option 2; 'Strategic policy plus LPP' the council's first proposed version, which had a similar effect to the PAC's suggested wording but with more flexibility. <p><i>Option 2 was selected as the council's preferred option in the First SA Addendum on the basis that it scored higher, and the overall appraisal against the SA Objectives was more positive.</i></p> <p>Following the consultation process, Strategic Policy SP1A has been revised and thus provides a third option:</p> <ul style="list-style-type: none"> • Option 3; 'Strategic policy plus LPP, revised version' the council's revised version of draft Policy SP1A, which must now be appraised as a further alternative to Option 2.

Assessment matrix for new policy option	
Summary	Outcome of appraisal
<p>Assessment matrix that appraises Options 2 and 3.</p> <p><i>*For clarity the matrix also includes the full appraisal of Option 1 (as recorded in the First SA Addendum).</i></p>	<ul style="list-style-type: none"> • <i>*Option 1 scored -5, which equated to a minor negative total score.</i> • Option 2 scored +6, which equated to a minor positive total score. • Option 3 scores +8, which equates to a minor positive total score. <p>This demonstrates that whilst Option 3 would retain the overall minor positive score as recorded by Option 2 in the First SA Addendum (<i>* and would subsequently perform better than Option 1</i>), it would perform better against the individual SA Objectives (SAOs) than Option 2.</p> <p>For these reasons Option 3, the revised Strategic Policy SP1A, has now been chosen as the council's preferred option.</p>
Total Strategic Policy scores	
Summary	Outcome of appraisal
<p>Scoring matrix of the council's preferred policy option, alongside the other Strategic Policies to show updated total scores of all Strategic Policies.</p>	<p>The total policy score for the council's preferred option is a minor positive, which would sit alongside the minor positive scores recorded for all other Strategic Polices.</p>
All Policy Scores	
Summary	Outcome of appraisal
<p>Table showing the total scores of all dPS policies.</p>	<p>The total scoring for all policies in the plan has been updated to include the council's preferred option, which introduces an additional minor positive impact.</p>

Total Effects of Strategic Policies on SA Objectives	
Summary	Outcome of appraisal
<p>Scoring matrix of all six Strategic Policies appraised, to show the updated total effects of each Strategic Policy against the SA Objectives. Also includes a comparison with the total effects of the five Strategic Policies that were previously appraised in the 2018 SA Report (i.e., not including new policy SP1A).</p>	<p>Introducing the revised Strategic Policy SP1A as the council's preferred option has affected eleven individual scores.</p> <p>Of these, the final total effects have changed for three SA Objectives:</p> <ul style="list-style-type: none"> • 1 is more positive with a change from neutral to minor positive (SAO 16), • 2 are less positive with changes from significant positive to minor positive (SAOs 3 & 8).
Total Effects of the LDP	
Summary	Outcome of appraisal
<p>Scoring matrix showing the total plan effects, with the total scores of all plan policies within each of the six themes shown against the SA Objectives. Also includes a comparison with the total plan effects from the 2018 SA Report (i.e., not including new policy SP1A).</p>	<p>The SA of revised Strategic Policy SP1A as the council's preferred option demonstrates that its introduction into the Plan Strategy will have no impact on how the plan performs as a whole against the 19 SA Objectives.</p> <p>The results of the 2018 SA Report will therefore be unaffected and will remain unchanged:</p> <p><i>Total Plan Effects against the SA Objectives, including revised Strategic Policy SP1A:</i></p> <ul style="list-style-type: none"> • 14 x significant positive effects • 4 x minor positive effects • 1 x neutral effect

Summary

- 2.15 Having undertaken a detailed appraisal of revised Strategic Policy SP1A, it is concluded that:
- **Option 3**, the council's revised Strategic Policy SP1A, would have a total **minor positive** effect when appraised against the SA Objectives,
 - Whilst **Option 2** also recorded a total minor positive effect, the higher individual scores for **Option 3** demonstrate that it would perform better against the individual SA objectives,
 - **Option 3** was subsequently selected as the council's **preferred option**,
 - A revised strategic policy based on Option 3 would introduce an **additional minor positive scoring policy** to the plan (i.e., when considering the total policy score for that option), which would be consistent with the **minor positive scores** recorded for the remaining Strategic Policies,
 - A revised strategic policy based on Option 3 would decrease the total positive effects of the Strategic Policies as a group against SA Objectives 3 & 8, however these would still record **minor positive scores**,
 - A revised strategic policy based on Option 3 would increase the total positive effects of the Strategic Policies as a group against SA Objective 16 from **neutral to minor positive**, and
 - A revised strategic policy based on Option 3 would have **no impact** on the total effects of the plan as a whole (as recorded in the 2018 SA Report).
- 2.16 The results of the appraisal demonstrate that the proposed changes to the policy would result in **higher** positive policy scores when compared to the previous version, Option 2, which was selected as the preferred option through the First SA Addendum. The total effects of the Strategic Policies against the SA Objectives, and the total effects of the plan as a whole, would **remain unchanged** from both the First SA Addendum and the SA Report 2018.
- 2.17 When read alongside the existing, remaining policies, the introduction of revised Strategic Policy SP1A to the Plan Strategy would result in **no impact, implications** or **changes** to how the plan as a whole would perform against the SA Objectives as reported in the 2018 SA Report.

3 Conclusions & recommendations

- 3.1 This Second SA Addendum highlights the effects that the proposed changes to Strategic Policy SP1A have had with regards to the appraisals published in the First SA Addendum and the 2018 SA Report.
- 3.2 The revised Strategic Policy SP1A would have additional positive results when compared to the previous version and would perform better against the SA objectives. It was therefore considered a suitable reasonable alternative to the previous, and on the basis of its SA score, the council selected it as its preferred option.
- 3.3 Subsequent appraisals were then carried out to determine the total policy score, the total effects score, and to show how the revised policy sits alongside the remainder of the dPS. These show that the revised policy would perform well as an individual policy with a minor positive SA score. Crucially, and as with the previous version, its inclusion within the dPS alongside the existing policies would result in no impact or change to how the dPS as a whole would perform against the SA Objectives.
- 3.4 In conclusion, the introduction of this revised policy to the dPS, to address modifications MOD05 and MOD06, would have no effect on the overall outcomes of the First SA Addendum or the 2018 SA Report.

Summary

- 3.5 Having considered the results of this appraisal, the council is satisfied that the proposed revisions to Strategic Policy SP1A can be made, and the new policy incorporated within the Plan Strategy, without impacting or changing how the plan as a whole would perform against the SA Objectives.

4 Next stages

- 4.1 This Second SA Addendum to the 2018 SA Report has been published alongside the **Draft Plan Strategy Post Independent Examination Consultation Report**, and incorporates the Environmental Report as required by the SEA Directive. It presents the integrated findings of the combined SA and SEA of the council's revised Strategic Policy SP1A, including the assessment of reasonable alternatives and recommendations for mitigating and monitoring significant effects.
- 4.2 The results of this addendum demonstrate that the revisions to the policy can be made without having any implications on the overall performance of the dPS against the SA Objectives. Its incorporation into the plan would not change the results and assumptions as set out in both the First SA Addendum and the 2018 SA Report.

What happens next?

- 4.3 The plan-making process will continue to follow the stages as detailed in the 2018 SA Report.
- 4.4 SEA Regulations require the council to produce a formal, post-adoption SA Statement to accompany the Plan Strategy, as soon as reasonably possible after its adoption. The purpose of the post-adoption statement is to outline how the SA process has informed and influenced the plan preparation and decision-making process and demonstrate how consultation on the SA was taken into account.
- 4.5 The post-adoption statement will include the revisions to Strategic Policy SP1A that have been appraised through this addendum, in addition to those documented in the First SA Addendum and all responses received to it through the consultation process.

5 Appendices

5.1 This Second SA Addendum to the SA Report 2018 is accompanied by two appendices:

- *Appendix 1: Detailed Sustainability Appraisal of Revised Strategic Policy SP1A*
- *Appendix 2: Summary of revisions to Strategic Policy SP1A*

Belfast Planning Service

Belfast City Council
Cecil Ward Building
4-10 Linenhall Street
Belfast BT2 8BP

 www.belfastcity.gov.uk/LDP

 planning@belfastcity.gov.uk

 028 9050 0510

 @belfastcc

 @belfastcitycouncil

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