



Belfast Local Development Plan

Self-assessment of Soundness

Draft Plan Strategy for Independent Examination

August 2019

www.belfastcity.gov.uk/LDP



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City Council

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1.0 Introduction

- 1.1 This document has been produced in accordance with the Planning Act (Northern Ireland) 2011 [the 2011 Act], which requires the Local Development Plan (LDP) to be examined in public in order to determine whether it is sound. This requires the council to submit the LDP, together with all associated documents, for the consideration by the Independent Examination (IE).
- 1.2 The purpose of the IE is to determine whether the LDP is fundamentally sound. Section 10 of the 2011 Act deals with the IE of each development plan document (DPD) and states that the council must submit every DPD (i.e. draft Plan Strategy and Local Policies Plan) to the Department for Infrastructure (DfI) for IE. This document is the council's 'self-assessment' of the draft Plan Strategy (dPS) procedural process and the tests of soundness. The Planning Act (Northern Ireland) 2011, The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 and relevant guidance documents have been referred to in assessing the soundness of the dPS.

2.0 Tests of Soundness

- 2.1 Part 2 of the 2011 Act sets out the general requirements for the LDP. Section 10 of the 2011 Act deals with the IE. The purpose of the IE is to determine:
 - Whether it satisfies the requirements relating to the preparation of the DPD; and
 - Whether it is sound.
- 2.2 The 'soundness' of the dPS requires it to be tested in terms of content, conformity and the process by which it was produced. The tests of soundness are based upon three categories which relate to how the dPS has been produced. They are as follows;
 - Procedural tests;
 - Consistency tests;
 - Coherence and effectiveness tests.
- 2.3 The full list of soundness tests are set out within Development Plan Practice Note 6: Soundness (see Appendix 1). These aim to provide a framework to assess the soundness of the dPS, while taking account of all relevant procedural, legislative and policy considerations.
- 2.4 Whilst the tests of soundness are based upon three categories, there is a degree of overlap in terms of the criteria used for each test. In addition, Development Plan Practice Note 6: Soundness also suggests that these examples may not constitute an inclusive and definitive list. Therefore, it is a matter for the council to decide the most appropriate evidence to demonstrate how it has met each test of soundness.

3.0 LDP Regulations tests

3.1 The regulation tests require that the dPS has been prepared in compliance with the relevant legal and legislative requirements and, in particular, The Planning (Local Development Plan) Regulations (Northern Ireland) 2015. The regulatory requirements are set out in Appendix 2.

3.2 The following section is structured around the requirements of the Regulations for ease of reference and includes an explanation of how the council has met these tests.

| No. | PART 2: Timetable: Preparation of the timetable | Y/N | Reg. | Comments |
|-----|--|------------|------|---|
| 1. | Were the Planning Appeals Commission (PAC) and any other consultation bodies the council considered appropriate consulted? | Yes | 5 | Consultation between the council and PAC began on 07 April 2016 regarding preparation of the timetable. PAC consultation also occurred as part of subsequent timetable revisions. |
| No. | PART 2: Timetable: Content of the timetable | Y/N | Reg. | Comments |
| 1. | Has the timetable included indicative dates for each stage of the preparation of the LDP including; <ul style="list-style-type: none"> • Publication of the preferred options paper (POP)? • Publication of the plan strategy (PS) and publication of the local policies plan (LPP)? and • Adoption of the PS and LPP? • The carrying out of the sustainability appraisal under section 8(6) (a) and the preparation of the report on the findings of the appraisal? | Yes | 6 | The LDP Timetable sets out the key stages and indicative timescales in the process to produce the Belfast LDP. Its purpose is to help ensure that the plan process is efficiently managed and that the key stakeholders, including the consultation bodies and the Planning Appeals Commission (PAC), are kept informed and can manage their own resources. The council adopted the initial Local Development Plan timetable on 1 June 2016, following approval by the Department of Infrastructure (Dfi). The timetable was first revised in March 2018. It has now been subject to a further revision, approved by Dfi in November 2018 (see Appendix 3). The timetable includes indicative dates for: <ul style="list-style-type: none"> • Publication of the preferred options paper (POP); • Publication of the plan strategy (PS) and publication of the local policies plan (LPP); • Adoption of the PS and LPP; |

| | | | | <ul style="list-style-type: none"> The carrying out of the sustainability appraisal under section 8(6) (a) and the preparation of the report on the findings of the appraisal. |
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| No. | PART 2: Timetable: Agreement of the timetable | Y/N | Reg. | Comments |
| 1. | Has the timetable been approved by resolution of the council prior to submission to the Department for its agreement? | Yes | 7 | The initial timetable was approved by Belfast City Council committee on 4 April 2016 prior to submission to Dfl for agreement. |
| 2. | Has the timetable been submitted to the Department? | Yes | 7 | The initial timetable was submitted to Dfl on 11 April 2016 for agreement. |
| 3. | Was the timetable agreed by the Department and was this before any advertisement of POP? | Yes | 7 | The initial timetable was approved by Dfl on 11 May 2016 (see Appendix 4). The statutory advertisement notice for the POP was published for two weeks starting on 26 January 2017. |
| No. | PART 2: Timetable: Availability of the timetable | Y/N | Reg. | Comments |
| 1. | Has the council made the agreed timetable available for inspection at its principal office and any other places within the district considered appropriate? | Yes | 8 | The timetable is available for inspection at Belfast City Council, Planning Service, Cecil Ward Building, 4-10 Linenhall Street, Belfast, BT2 8BP. |
| 2. | Has the council given notice by local advertisement that the timetable is available for inspection and the place and times at which it can be inspected? | Yes | 8 | Notice of the initial timetable was given in the Belfast Gazette on the week commencing 27 June 2016 and week commencing 4 July 2016. The notice stated that the timetable may be examined between the hours of 9.00am-5.00pm (Monday to Friday) at Belfast City Council Planning Service offices. This notice was also advertised in local papers (see Appendix 5). |
| 3. | Has the council published the timetable on its website? | Yes | 8 | The timetable is published and can be viewed on the Belfast City Council website: www.belfastcity.gov.uk . |
| 4. | Has any revision of the timetable been in accordance with the requirements of Regulations 7 & 8? | Yes | 8 | The first revised timetable was approved by the council on 4 December 2017 and was subsequently submitted to Dfl on 21 March 2018. The timetable was agreed by Dfl on 29 March 2018 (see Appendix 4). Notice of the revised timetable was given in the Belfast Gazette on the week commencing 9 April 2018 |

| | | | | <p>and week commencing 16 April 2018 stating where the timetable could be inspected. This notice was also advertised in local papers (see Appendix 5). The revised timetable was published on the council's website.</p> <p>The second revised timetable was approved by the council prior to submission to DfI for agreement on 1 October 2018 and was subsequently submitted to DfI on 10 October 2018 (see Appendix 4). The timetable was agreed by DfI on 15 November 2018. Notice of the revised timetable was given in the Belfast Gazette on the week commencing 31 December 2018 and week commencing 7 January 2019. These notices stated where the timetable can be inspected. This notice was also advertised in local papers (see Appendix 5). The revised timetable was published on the council's website.</p> |
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| No. | PART 3: Preferred Options Paper: Preparation of the preferred options paper | Y/N | Reg. | Comments |
| 1. | Has the council (for generation of alternative strategies and options) engaged the consultation bodies before publishing POP? | Yes | 9 | <p>The council engaged extensively with the consultation bodies before publishing the POP. At this early stage in the LDP process alternative strategies were considered including the options that were published in the POP and associated documentation.</p> <p>Engagement was further facilitated through the council's extensive engagement around its new community plan, called the Belfast Conversation. Indeed the Belfast Conversation clearly set out the council's proposed growth strategy, which was ultimately embedded in the final community plan, called the Belfast Agenda.</p> <p>In addition to the above engagement was facilitated through the Development Plan Working Group and a series of one to one meeting with consultative bodies.</p> |

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| | | | | The above engagement set out the council's intended approach to its LDP and provided a mechanism for discussion around alternative approaches and strategies. Details of meetings at this early stage in the LDP process are contained in Appendix 6. |
| 2. | Has the council taken into account any representations received from the consultation bodies? | Yes | 9 | The council has taken account of all representations received from the consultation bodies arising from the pre-POP engagement outlined above. |
| No. | <u>PART 3: Preferred Options Paper: Availability of the preferred options paper</u> | Y/N | Reg. | Comments |
| 1. | Has the council made the following documents available for inspection:- <ul style="list-style-type: none"> • A copy of the preferred options paper? • Relevant supporting documents? • Dates within which representation on the POP may be made? • Address where representations can be sent? | Yes | 10 | Each document as specified in regulation 10(a) was made available for inspection at Belfast City Council Planning Service offices during normal office hours. |
| 2. | Has the council made a copy of the POP document available for inspection at the principal offices and other appropriate places within the district? | Yes | 10 | The council made a copy of the POP document available for inspection at Belfast City Council Planning Service offices during normal office hours. |
| 3. | Has the council sent the information set out in paragraph (a) Regulation 10, to the consultation bodies? | Yes | 10 | The council notified the consultation bodies on 26 th January 2017 regarding availability of the POP and supporting documents for inspection with notice of address to which representations should be sent (see Appendix 7). |
| 4. | Has the council given notice by local advertisement of the following:- <ul style="list-style-type: none"> • The title of the local development plan? | Yes | 10 | Notice of the POP was published in the Belfast Gazette on the week commencing 16 January 2017 and week commencing 23 January 2017. The notice was in accordance with Regulation 10 (d). This notice was also published in local |

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| | <ul style="list-style-type: none"> A statement that the POP is available for inspection and the places and times at which it can be inspected? A brief description of the content and purpose of the preferred options paper? Details of how further information on the preferred options paper may be obtained? | | | papers during the same weeks (see Appendix 5). |
| 5. | <p>Has the council published the following on its website:-</p> <ul style="list-style-type: none"> The POP? Such supporting documents relevant to the POP? The document stating dates of public consultation and address to which representations can be sent? | Yes | 10 | The council published on its website the POP and all supporting documents, including stating dates of public consultation and address to which representations should be sent in accordance with regulation 10(e). |
| No. | <u>PART 3: Preferred Options Paper: Public consultation on the preferred options paper</u> | Y/N | Reg. | Comments |
| 1. | Was the public consultation period for the POP between 8 and 12 weeks? | Yes | 11 | The public consultation period for the POP was from Thursday 26 January 2017 until 5pm on Tuesday 20 April 2017 (12 weeks). |
| 2. | Has the council taken account of any representations made in accordance with paragraph (2) Regulation 11, before it prepares a development plan document? | Yes | 11 | The council has fully considered all representations made on the POP in accordance with regulation 11(2). The council has presented these in the POP Public Consultation Report, which provides a summary of the representations received relating to the vision and strategic aims as well as highlighting the responses to the preferred options. This document can be viewed on the council's website: POP Public Consultation Report |

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| No. | <u>PART 4: Form and Content of Development Plan Document:</u> | Y/N | Reg. | Comments |
| 1. | Does the development plan document contain:- | Yes | 12 | The title is: 'Belfast Local Development Plan- Draft Plan Strategy 2035' |

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| | <ul style="list-style-type: none"> • A title which must give the name of the council district for which the LDP is prepared and indicate whether it is a plan strategy or local polices plan? • A sub-title which must indicate the date of the adoption of the development plan document? | | | The plan has not yet been adopted and therefore no adoption date has been finalised. The adoption date will be added as a sub-title on its adoption. |
| 2. | Does the development plan document contain a reasoned justification of polices contained within it? | Yes | 2 | Each policy has the relevant justification and amplification located below each policy box. |
| 3. | Are those parts of a development plan document which comprise polices of the LDP and those parts which comprise the reasoned justification readily distinguishable? | Yes | 12 | Every policy is comprised within a separate coloured box (the colour of the boxes are in line with the LDP strategic aims and objectives). The justification and amplification is noticeably distinguishable from this and is located directly below each policy box with a clear heading. |
| No. | <u>PART 4: Form and Content of Development Plan Document: Proposals map</u> | Y/N | Reg. | Comments |
| 1. | Does the development plan document contain a map or maps describing the policies and proposal set out in the development plan document, so far as practicable to illustrate such policies or proposals spatially? | Yes | 13 | <p>There are a number of maps set out within the draft Plan Strategy to illustrate the policies at a level deemed acceptable for a strategic document, in compliance with departmental guidance. Further clarification is set out of the council's approach in page 18 (paragraphs 3.2.8- 3.2.11) of the draft plan strategy.</p> <p>As this is a two-stage approach, more detailed maps describing the policies will be provided at the LPP Stage.</p> |
| 2. | Is the proposals map sufficiently detailed so as to enable the location of proposals for the development and use of land to be identified? | Yes | 13 | Each map is sufficiently detailed with a distinguishable title and key illustrating the location of proposals for the development and use of land, insofar as it is appropriate to this stage of the LDP process. |

| No. | <u>PART 4: Form and Content of Development Plan Document:</u> Additional matters to be taken into account | Y/N | Reg. | Comments |
|-----|--|------------|------|---|
| 1. | Has the council taken into account when preparing the LDP the objectives of preventing major accidents and limiting the consequence of such accidents? | Yes | 14 | The objectives of preventing major accidents and limiting the consequence of such accidents is included in Policy ENV 1- 'Environmental quality'. In addition further guidance and evidence of this is included in Technical Supplement 16: Environmental Issues. COMAH sites and airport safety zones continue to exist and these will also be considered at the LPP stage. In addition, the council continues to consult the relevant authorities regarding development proposals that may impact on these sites. |
| 2. | Has the council taken into account when preparing the LDP the long term objective to maintain appropriate distances between establishments covered by the Directive and residential areas, buildings and areas of public use, major transport routes as far as possible, recreational areas of particular natural sensitivity or interest? | Yes | 14 | The objective of maintaining appropriate distances between establishments and the specified areas is incorporated in the dPS, in particular through Policy ENV 1- 'Environmental quality' and Technical Supplement 16: Environmental Issues. Such distances will also be an important consideration when allocating land uses and proposals at the LPP stage. In addition, the council continues to consult the relevant authorities regarding development proposals that may impact on these sites. |
| 3. | Has the council taken into account when preparing the LDP, in the case of existing establishments, for additional measures in accordance with Article 5 of the Directive so as not to increase the risks to people? | Yes | 14 | The objective of not increasing risks to people arising from existing establishments is incorporated in the dPS, in particular through Policy ENV 1- 'Environmental quality' and Technical Supplement 16: Environmental Issues. This objective will also be an important consideration when allocating land uses and proposals at the LPP stage. In addition, the council continues to consult the relevant authorities regarding development proposals that may impact on these sites. |

| No. | <u>PART 5: Development Plan Document Procedure:</u> Availability of a development plan document | Y/N | Reg. | Comments |
|-----|--|------------|------|--|
| 1. | Is a copy of the development plan document available for inspection (during normal working hours)? | Yes | 15 | A copy of the dPS document is available for inspection at Belfast City Council Planning Service offices during normal office hours. |
| 2. | Is a copy of the sustainable appraisal report available for inspection? | Yes | 15 | A copy of the sustainable appraisal report is available for inspection at Belfast City Council Planning Service offices during normal office hours. |
| 3. | Is a copy of any relevant supporting documents in the preparation of the LDP available for inspection? | Yes | 15 | Copies of all relevant supporting documents in preparation of the LDP are available for inspection at Belfast City Council Planning Service offices during normal office hours. The council published notices for the availability of additional documentation four weeks prior to formal consultation in the Belfast Gazette and local papers on the weeks commencing 20 th August and 27 th August 2018 (see Appendix 5) to facilitate widespread engagement. |
| 4. | Is a copy of the statement indicating the period within which representations on the LDP may be made and notice of the address available for inspection? | Yes | 15 | A copy of the statement indicating the period within which representations on the LDP can be made and notice of the address is available for inspection at Belfast City Council Planning Service offices during normal office hours. |
| 5. | Notice of the address to which representations can be sent? | Yes | 15 | Notice of address to which representation can be sent was published in the Belfast Gazette on the week commencing 17 September 2018 and week commencing 24 September 2018. It stated that representations can be submitted online using the Belfast City Council consultation site accessible at www.belfastcity.gov.uk/LDP , by email and by post to Belfast City Council Planning Service offices. This notice was also advertised in a local papers (see Appendix 5). |
| 6. | Has a copy of all documents specified in paragraph (a) regulation 15 of The Planning (LDP) Regulations (NI) 2015 been sent to the consultation bodies? | Yes | 15 | The council notified the consultation bodies on 9 August 2018, giving details of the consultation period, the availability of all documents and how/when to make any submission. The document also contained the links to the dPS documents (See Appendix 8). |

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| 7. | Has notice been given in the Belfast Gazette and by local advertisement which include the title of the development plan document and details of places and times the document can be inspected? | Yes | 15 | Notice of the dPS was published in the Belfast Gazette on the week commencing 17 September 2018 and week commencing 24 September 2018. It stated the title of the development plan document and details of places and times the document could be inspected (See Appendix 5) |
| 8. | Is the development plan document, any supporting documentation and the notice mentioned in paragraph regulation 15 (a) (iv) published on the council website? | Yes | 15 | The dPS and all supporting documentation are published on the council's website. The webpage stated the period within which representations on the development plan may be made (Thursday 20 September 2018 to Thursday 15 November 2018). |
| No. | <u>PART 5: Development Plan Document Procedure:</u> Availability of representations on a development plan document | Y/N | Reg. | Comments |
| 1. | Has the council made the following available for inspection after the statutory 8 weeks consultation period: <ul style="list-style-type: none"> • A copy of the representations? • Document with the dates within which counter representations may be made? • Notice of the address to which counter representations can be sent? | Yes | 17 | The council has made a copy of the representations and details of the dates within which counter representations may be made and the address to which counter representation can be sent available for inspection after the statutory 8 weeks period. |
| 2. | Has the council made a copy of documents available for inspection at the principal offices and other appropriate places within the district? | Yes | 17 | A copy of all documents were made available for inspection at Belfast City Council Planning Service offices during normal office hours. |
| 3. | Are the representations published on the council website? | Yes | 17 | The representations have been published on the council's website accordingly. |
| 4. | Has notice been given in the Belfast Gazette and by local advertisement which state that representations are available for inspection and the | Yes | 17 | Notice of the availability of representations was published in the Belfast Gazette and local papers on the week commencing 25 February 2019 and week commencing 4 March 2019. It |

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| | place and times which they can be inspected? | | | stated the place and times when they can be inspected (See Appendix 5). |
| 5. | Has the council notified the consultation bodies of the fact that representation are available for inspection and the places and times at which they can be inspected? | Yes | 17 | The council notified the consultation bodies on 25 February 2019 that representations are available for inspection and the places and times at which they can be inspected (See Appendix 9). |
| 6. | Has the council notified any person who has made (and not withdrawn) a representation in accordance with regulation 16(2)? | Yes | 17 | The council notified each respondent deemed necessary under regulation 16(2). |
| No. | <u>PART 5: Development Plan Document Procedure: Public consultation on site specific representations</u> | Y/N | Reg. | Comments |
| 1. | Have the counter representations: <ul style="list-style-type: none"> • Been made within a period of 8 weeks starting on the day the council complies with regulation (17) (a)? • Sent to the address specified in regulation 17(1) (a) (iii)? | Yes | 18 | All counter representations were received within the statutory period from 12noon on Friday 1 March to 12noon Friday 26 April 2019 and to the specified address. |
| No. | <u>PART 5: Development Plan Document Procedure: Availability of representations on site specific policy representations</u> | Y/N | Reg. | Comments |
| 1. | Has the council (as soon as reasonable practicable after the statutory 8 weeks consultation period): <ul style="list-style-type: none"> • Made a copy of the counter representation available for inspection at- <ul style="list-style-type: none"> ○ Its principle offices?, and ○ Such other places within the district of the council as the council considered appropriate? | Yes | 19 | A copy of all counter-representation documents were made available for inspection at Belfast City Council Planning Service offices during normal office hours from 23 rd August 2019. These were also made available for inspection on the council's website. |

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| | <ul style="list-style-type: none"> Publish this information on its website? | | | |
| No. | <u>PART 5: Development Plan Document Procedure: Submission of documents for independent examination</u> | Y/N | | Comments |
| 1. | Has the council considered representations made under regulation 16 and, as the case may be, regulation 18 (public consultation on a development plan document)? | Yes | 20 | The council has fully considered the representations made in relation to the plan strategy and counter representations, set out in the draft Plan Strategy Consultation Report. The council has prepared a summary report outlining the nature of comments and key issues raised and the council's response to these. |
| 2. | Has the council submitted the following prescribed documents to the department; <ul style="list-style-type: none"> The sustainability appraisal report under section 8(6) (b)? The statement of community involvement? Evidence that the council has complied with the statement of community involvement? Copies of the notices (POP, dPS & reps stages)? The timetable? A statement setting out- <ul style="list-style-type: none"> A summary of the main issues raised in representations in accordance with regulation 11(2)? How those main issues have been taken into account in the preparation of the development plan document? A statement setting out- | Yes | 20 | The council has submitted all the specified documents herewith. |

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| | <ul style="list-style-type: none"> ○ If representations were made in accordance with regulation 16(2), the number of representation made and a summary of the main issues raised on those representations?, or ○ That no such representation were made; • Copies of any representations made in accordance with regulation 16(2) or 18(2)? • Any additional documents the council consider relevant to the preparation of the development plan document? | | | |
| 3. | Has the council sent the department a copy of dPS? | Yes | 20 | Enclosed herewith. |
| No. | <u>PART 5: Development Plan Document Procedure:</u> Availability of submission documents? | Y/N | | Comments |
| 1. | As soon as reasonably practicable after a council submits a development plan document to the Department it must; <ul style="list-style-type: none"> • Make the following documents available for inspection at the places referred to in paragraph (b) <ul style="list-style-type: none"> ○ a copy of the development plan document, ○ the documents specified in regulation 20(2), and | Yes | 21 | As soon as reasonably practicable following submission of the development plan documents to Dfl, the council will make the relevant documents available as required. |

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| | <ul style="list-style-type: none"> ○ such other documents as in the opinion of the council are relevant to the preparation of the development plan document; • The places referred to in paragraph (a) are- <ul style="list-style-type: none"> ○ the council's principal offices, and ○ Such other places in the district of the council as the council considers appropriate. • Notify the consultation bodies of the fact that the development plan document and the documents mentioned in paragraph (a) are available for inspection and the places and times at which they can be inspected; • Notify any person who has made (and not withdrawn) a representation in accordance with regulation 16(2) or 18(2) of those matters; • Give notice in the Belfast Gazette and by local advertisement of the fact that the development plan document has been submitted to the Department; and • Publish the notice mentioned in paragraph (e) on its website. | | | |
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4.0 Procedural Tests

| Test | Y/N | Comments |
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| <p>P1. Has the plan been prepared in accordance with the council's timetable and the Statement of Community Involvement?</p> | <p>Yes</p> | <p>As set out under section 4 and section 7 of the 2011 Act, Belfast City Council published its original LDP timetable and SCI in June 2016, these documents having been approved by DfI on 11 May 2016. The timetable has been subject to two subsequent revisions and the Statement of Community Involvement (SCI) has also been subject to a minor amendment. The PAC has been consulted in the preparation of both the timetable and SCI. DfI has also been formally consulted and agreed the terms of the adopted timetable and SCI and the subsequent revisions.</p> <p>The timetable indicates a number of key milestones for the LDP process and these are set out below, with the actual dates of delivery. These demonstrate that the LDP has, thus far, been delivered generally in accordance with the timetable:</p> <p>Publication of POP: Timetable - Autumn 2016 Actual – Jan 2017</p> <p>Publication of dPS: Timetable – August 2018 Actual – August 2018</p> <p>Start of IE stage: Timetable – May 2019 Actual – August 2019</p> <p>The council's SCI sets out how and when engagement on the LDP will occur and sets out how and when stakeholders and the community can contribute to preparing the LDP and its Sustainability Appraisal (SA). It also includes commitments to publish statutory notices, undertake public launch, public exhibitions and</p> |

| Test | Y/N | Comments |
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| | | <p>events that provides an opportunity for members of the public to comment on the LDP.</p> <p>Governance</p> <p>A steering group was set up to govern the LDP process comprising of council members, with the Chief Executive, the Director of Place and Economy or Planning Manager. This is a high-level co-ordinating body that will ensure overview and strategic input on behalf of the whole community, as well as from the planning professionals. Alongside this, a project management team was also set up comprising senior council officers, the principal planning officer and invited representatives from the key statutory/government departments. The purpose of the team is to ensure key consultees are able to contribute to and co- operate in the plan making process. The project management team were consulted on, and acted as an initial scoping group for the SA, including SEA.</p> <p>Working groups were set up in relation to topic areas. In accordance with the development plan guidance notes and the SCI, the council engaged with a wide range of groups, organisations and the wider public to assist developing a consensus on the generation of alternative strategies and options together with identifying key issues.</p> <p>At the POP Stage</p> <p>In total there were 82 consultation engagement events were carried out with communities of interest, including;</p> <ul style="list-style-type: none"> • Area events- Four area events were organised along with the Belfast Agenda and Local Investment Fund. These events were held across the city in Girdwood, Olympia, Skainos and the Innovation Factory. |

| Test | Y/N | Comments |
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| | | <ul style="list-style-type: none"> • 52 stakeholder consultations including meetings with adjacent councils • Youth groups, such as the Youth Forum, the Festival Forum and Senior’s Forum. • Organisations covering specific areas of the city, such as Belfast Area Partnerships, Neighbourhood Renewal Partnerships, Belfast Hills Partnership and Resident Groups. • Business organisations, such as, Belfast City Centre Management, Belfast Chamber of Trade and Commerce and the Harbour Commissioners. • Professional bodies, such as Royal Institute of Chartered Surveyors and Royal Society of Ulster Architects. <p>Section 75 Specific S75 engagement throughout the POP process included a drop-in session in the Planning Service offices and a special event for disabled groups held at Grosvenor Hall.</p> <p>Councillors Internal events were organised to inform and generate awareness among council staff.</p> <p>Statutory Consultees Regular meetings were held with the LDP Steering Group and statutory consultees. Extensive public consultation and engagement were carried out as part during the POP stage. This was followed by a sustained period of engagement with statutory and other stakeholders in the development of draft policies. An engagement and communication plan, covering the public consultation process, was also considered by the planning committee in June 2018. This sets out details of how we intended to engage with the stakeholders, including details of the citywide events as currently planned.</p> |

| Test | Y/N | Comments |
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| | | <p>At Draft Plan Strategy stage</p> <p>Focussed engagement to encourage the widest participation included the production of leaflets, summary document, animation video and media/social media. The more detailed outline of awareness raising events took place during the first four weeks of the consultation period. In addition the organisations that responded to the council during the POP stage were all contacted to make them aware of both the events and the consultation process.</p> <p>Public events were set up across the city to raise awareness about the consultation, discuss the policies within the plan and answer any questions, and let people know how they can make comment.</p> <p>Meetings were held with partnership boards and representatives: Themed workshops were again held with some of the stakeholders involved in shaping policies within the Draft Plan Strategy. See further details in the separate report on the LDP Compliance with the Statement of Community Involvement (SCI).</p> <p>As part of the ongoing engagement with members, a workshop was held with the planning committee on the 12th January 2018, to present a summary of the working version of the draft plan strategy policies for consideration. A further workshop, open to all elected members, took place on the 15th February 2018 alongside ongoing party briefings. The engagement concluded with a planning committee workshop on 17 May 2018 and a special planning committee on the 6th June 2018. The plan was endorsed by the council on 2 July 2018.</p> |
| <p>P2. Has the council prepared its Preferred Options Paper and taken into account any representations made?</p> | <p>Yes</p> | <p>The POP has been prepared and consulted upon in accordance with the timetable and SCI. The POP and its associated documents including the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) have outlined the vision, objectives and key planning issues affecting the council area. The possible options</p> |

| Test | Y/N | Comments |
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| | | <p>on how to deliver new development and planned growth and what our preferred options are and the rationale for that preference. This has been done in accordance with the community plan, RDS 2035, SPPS and other policy and guidance published by the Department. The POP does not depart from the approach in regional guidance and strategic policy.</p> <p>Consultation on the POP took place from 26 January - 20 April 2017, over a 12-week period. A total of 141 responses were received - 107 were organisations and 34 were Individuals. Additional Topic Papers and supporting evidence were published alongside the POP. In addition, a sustainability appraisal (incorporating strategic environmental assessment), countryside assessment and equality impact assessment were published.</p> <p>The council took account of all submissions received in preparing the draft Plan Strategy. In addition, the council (approved by the planning committee on 20 June 2017) published the POP Public Consultation Report in July 2017, which summarised the representations received and stated how these would be taken into account. This can be viewed on the councils website page: POP Public Consultation Report</p> <p>The POP has been founded on robust evidence base. The Sustainability Appraisal (incorporating Strategic Environmental Assessment) - Scoping report sets out the evidence base to inform the appraisal, establishes the SA framework and objectives, and includes feedback from the consultation body.</p> <p>The Sustainability Appraisal (incorporating Strategic Environmental Assessment) – Interim report consists of the SA scoping report and using the SA Framework, undertakes and</p> |

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| | | <p>assessment of reasonable alternatives to enable the determination of options in the POP. Additional supporting documents and topic papers provide the evidence base.</p> <p>The POP, in its associated SA/SEA, sets out the options considered. Where no alternative option has been considered the clear rationale has been set out.</p> |
| <p>P3. Has the plan been subject to sustainability appraisal including Strategic Environmental Assessment?</p> | <p>Yes</p> | <p>POP</p> <p>The POP was subject to an interim SA/SEA, which was published alongside all the POP documents. The policy development of the draft Plan Strategy was subject to SA/SEA and the final appraisal report was also published with the dPS documents. This can be viewed on: Sustainability Appraisal (Incorporating Strategic Environmental Assessment) - Interim report</p> <p>The scoping report sets out the evidence base to inform the appraisal, establishes the SA framework and objectives, and includes feedback from the consultation body. This can be viewed on: Sustainability appraisal - Scoping report</p> <p>In addition, baseline data has been gathered on the principal economic, social and environmental characteristics of the council's district through consultation papers, topic papers and other supporting documents. This can be viewed on the councils website page: Baseline data- POP</p> <p>dPS</p> <p>The draft Plan Strategy has also been subject to an interim SA/ SEA, which was published alongside all the dPS documents. The SA role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It can help make</p> |

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| | | <p>sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. This can be viewed on the councils website page: Sustainability Appraisal Report- August 2018</p> <p>Additional baseline data has been gathered, such as the Equality Impact Assessment (EqIA), Countryside Assessment, Technical Supplements and other studies. These can be viewed on the council's website page: Baseline Data- dPS</p> |
| <p>P4. Did the council comply with the regulations on the form and content of plans and on the procedure for preparing such documents?</p> | <p>Yes</p> | <p>The Draft Plan Strategy complies with the requirements for form and contents, as set out in section 8(2). This includes:</p> <ul style="list-style-type: none"> (a) the council's objectives in relation to the development and use of land in its district; (b) its strategic policies for the implementation of those objectives; and (c) Such other matters as may be prescribed. <p>The council has carefully considered all consultation responses received in relation to the POP. These have been presented in the POP Public Consultation Report. This report provides a summary of the representations received relating to the vision and strategic aims as well as highlighting the responses to the preferred options. The POP representations have helped the council prepare for the dPS. This document can be viewed on the council's website: POP Public Consultation Report</p> <p>The council has also carefully considered all representations and counter representations received in relation to the dPS. The council has prepared a summary report outlining the nature of comments, key issues raised and the council's response to these.</p> |

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| | | <p>The dPS documents sets out justification and amplification in relation to the policy contained within. This includes supporting justification for the growth strategy and spatial framework and any other policies/ allocations. Justification and amplification also makes reference to regional policy and guidance and is based on other evidence gathered as justification for the policy approach set out.</p> <p>The draft Plan Strategy fully complies with all the relevant regulations as illustrated above.</p> |

5.0 Consistency Tests

| Test | Y/N | Comments |
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| C1. Did the council take account of the Regional Development Strategy? | Yes | <p>Both the POP and dPS are in accordance with the RDS. The RDS provides an overarching strategic planning framework to facilitate and guide both public and private sectors. In broad terms the RDS aims to take account of the economic ambitions and needs of the region, and put in place spatial planning, transport and housing priorities that will support and enable the aspirations of the Region to be met. This is supported by 8 aims:</p> <ul style="list-style-type: none"> • Support strong, sustainable growth for the benefit of all parts of the Region. • Strengthen Belfast as the regional economic driver and Londonderry as the capital of the North West. • Support our towns, villages and rural communities to maximise their potential. • Promote development which improves the health and well-being of communities. • Improve connectivity to enhance the movement of people, goods, energy and information between places. • Protect and enhance the environment for its own sake. • Take actions to reduce our carbon footprint and facilitate adaptation to climate change. • Strengthen links between north and south, east and west, with Europe and the rest of the world. <p>This has informed the Plan's growth strategy and spatial development strategy, as well as its overall policy objectives and detailed operational policies. The technical supplements and other studies provide additional evidence that justifies the strategy, policies and proposals in the dPS. This can be found at:</p> <p>dPS Evidence base</p> |

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| C2. Did the council take account of its Community Plan? | Yes | <p><u>POP</u></p> <p>Belfast's community plan was developed in tandem with the POP stage and therefore its goals aims and objectives have influenced the considerations of alternative options and the identification of the preferred options. In this regard the community plan and the POP are closely aligned. In addition both documents were structured and presented along similar thematic lines to further demonstrate their synergies and interdependence. Furthermore the public consultation on the POP was undertaken in tandem with that for the community plan to highlight the integration of the two documents.</p> <p><u>dPS</u></p> <p>The dPS is in accordance with the Community Plan, "The Belfast Agenda", which was adopted in November 2018. The Belfast Agenda is structured around 4 priority pillars:</p> <ul style="list-style-type: none"> • Growing the economy- creating jobs and investment • City development- Creating a competitive and sustainable city • Living here- Making life better for all our residents • Working and learning- Connecting people to opportunities <p>This has informed the Plan's growth strategy as well as its overall policy objectives and detailed operational policies. In addition the sustainability appraisal has also shown how the council has considered the community plan.</p> |
| C3. Did the council take account of policy and guidance issued by the Department? | Yes | <p>The dPS policies are in accordance with the SPPS. In addition, the dPS has taken full account of extant planning policies contained in the suite of PPSs and the policy approach is consistent with these. The LDP has also been prepared in accordance with the guidance issued and published by the DfI (and DoE), including the Development Plan Practice Notes.</p> |

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| C4. Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district? | Yes | <p>The preparation of the dPS has given due regard to all relevant plans and strategies relating to both the city area and to adjoining council areas. This includes consideration of:</p> <p>Extant development plans</p> <ul style="list-style-type: none"> • Belfast Urban Area Plan 2001 (BUAP), • Lisburn Area Plan 2001, • North Down and Ards Area Plan 1984-1995. • Lagan Valley Regional Park Local Plan 2005; • Belfast harbour Local Area Plan 1990-2005; • Houses in Multiple Occupation (HMOs) Subject Plan for Belfast City Council Area 2015. <p>Other relevant development plans:</p> <ul style="list-style-type: none"> • Draft Belfast Metropolitan Area Plan (DBMAP), <p>Other BCC strategies;</p> <ul style="list-style-type: none"> • The Belfast City Centre Regeneration and Investment Strategy 2015; • Draft Green and Blue Infrastructure Plan (June 2018); • Belfast Open Space Strategy 2005; • Draft Belfast Open Space Strategy (2019). <p>It should be noted that many of the city's extant development plans also cover adjoining districts. In addition, there are other extant and emerging plans that cover the adjoining districts. These have been considered in preparation of the dPS and are also clearly set out in the POP topic papers and the dPS technical supplements.</p> <p>Belfast City Council established the Metropolitan Area Spatial Working Group (MASWG) in 2017 to bring together members and officers from the five councils (Belfast, Lisburn and Castlereagh, Antrim and Newtownabbey, Ards and North Down and Mid and East Antrim) with further representatives from a number of government</p> |

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| | | <p>departments. It provides a forum for discussions with neighbouring councils which helped identify opportunities to: develop cross boundary working, share information, review progress and to identify, where feasible, consensus on common issues. This provides an open forum for discussion on the intended policy approach by adjoining district councils in their own proposed LDPs. A list of the dates upon which the MASWG met and a summary of key topics discussed can be viewed at Appendix 10.</p> <p>In addition the council is part of the Development Plan Working Group (DPWG), where all 11 local authorities participate - covering a range of planning topics that affect the whole of Northern Ireland.</p> <p>Therefore, during the preparation of the POP, its evidence base and the dPS, the council engaged both formally and informally with adjoining councils.</p> |

6.0 Coherence and effectiveness tests

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| <p>CE1. Does the plan set out a coherent strategy from which its policies and allocations logically flow? Where cross boundary issues are relevant is it in conflict with the plans of neighbouring councils?</p> | <p>Yes</p> | <p>The dPS and its policies flow logically from the evidence base and seek to secure sustainable growth of the plan area, in accordance with regional planning policy and the Belfast Agenda. The dPS focuses development in the urban area and, in particular, it seeks to secure the reuse of brownfield sites throughout the city, with priority given to the inner city and other.</p> <p>The overall strategy and level of growth proposed is considered to represent a balanced approach, having regard to the evidence base and Belfast's role as the regional capital and economic driver.</p> <p>The dPS sets out an overall strategy and a suite of strategic objectives that inform the growth strategy, spatial development strategy and detailed policies. The strategy aligns with regional planning policy and the vision and aims of the Belfast Agenda. Indeed, the dPS (and future LPP) are the spatial reflection of the city's community plan.</p> <p>The structure of dPS ties into the Belfast Agenda which is working towards inclusive growth with immediate priorities; Growing the economy, City development, Living here and Working and learning.</p> <p>The dPS has been prepared and presented in a clear and consistent manner, using the thematic areas mentioned above. The SA process has also ensured consistency in the policy approach, ensuring that all policies are working towards the agreed sustainability objectives.</p> <p>In regards to cross boundary issues the Metropolitan Area Spatial Working Group (MASWG) was extremely beneficial to identify any potential cross boundary issues. The working</p> |

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| | <p>group identified the following areas of mutual interest along broad planning themes including:-</p> <ul style="list-style-type: none"> • LDP Growth Strategy and Spatial • Framework • Housing Growth • Economic Growth • Town Centres, Retailing and Offices • Tourism and Open Space • Transport • Other Infrastructure • Historic and Natural Environment • Minerals • Cemetery Provision <p>However it is important to note that each council within the working group is at different stages in creating their respective LDPs and it would be unreasonable and impracticable to expect clear alignment or agreement. Nevertheless through cooperation and discussion there was a clear understanding of other adjoining councils intended policy approach and this has been taken into account in the preparation of the dPS.</p> <p>It is important to note that no site-specific allocations have been made at the draft Plan Strategy stage this will be done at the local policies plan stage. The expectations and ambitions of each council cannot be expected to achieve a homogenised position, rather a shared understanding of what was proposed and how it could help address the needs of the wider region.</p> <p>Furthermore as regards detailed allocations and other cross boundary issues, these matters will be addressed through continuing engagement with adjoining councils as the Local Policies Plans are prepared.</p> <p>The dPS policies are consistent with one another to support the plans overall strategy. In addition the SA/SEA process has ensured that policies are</p> |
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| | | consistent and coherent and seek to support the stated objectives. |
| CE2. Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base? | Yes | <p>The dPS approach is supported by extensive evidence, including national, regional and local policy context. In addition, it is based on Belfast-specific evidence and assessments, including technical analysis prepared by the council and by independent experts and consultants on a range of key subjects.</p> <p>The process of assessment of evidence required has been ongoing throughout the dPS preparation process and its currency has been maintained to date, including to take account of issues raised during the recent consultation stage.</p> <p>All these documents were made available to the public as part of the consultation stages of the POP and dPS. This evidence base informs the policy approach taken and provides the reasoned justification for each of the policies. The evidence base is included in a series of Topic Papers (POP Stage), Technical Supplements (dPS Stage), various assessments and bespoke research reports.</p> <p>Alternatives were considered through the dPS preparation process and these are outlined in the POP and the SA/SEA. These included consideration and testing of various growth options for Belfast and how such growth could be accommodated in a sustainable way.</p> <p>All evidence is available on the council website. Evidence for the POP and dPS can be found at: Preferred Options Paper (POP) Evidence Local Development Plan Draft Plan Strategy Evidence</p> <p>Appendix 11 sets out further details of the thematic working groups and other meetings with consultation bodies that occurred during the</p> |

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| | | <p>preparation of the dPS, which forms part of the extensive evidence base and assessment process that informed the dPS.</p> |
| <p>CE3. Are there clear mechanisms for implementation and monitoring?</p> | <p>Yes</p> | <p>The dPS indicates how it is to be implemented and monitored. The policies, which largely reflect established planning policy, will be implemented through the development management process. Decision-making will be monitored to ensure that the policies remain relevant, robust and effective.</p> <p>The dPS will inform the LPP in due course.</p> <p>Infrastructure providers have been consulted throughout the dPS process and are aware of the city's growth strategy and spatial development strategy. The dPS acknowledges that future development will require to be phased in line with any new infrastructure provision to ensure sustainable development.</p> <p>The LDP will be monitored in line with the monitoring framework. In addition, the LDP will be subject to the statutory review process to ensure that its policies and zonings/designations (at LPP stage) are appropriate and deliverable and proposals will be subject to the normal scrutiny of the development management process in future.</p> <p>The implementation and monitoring arrangements set out in the dPS include a range of indicators for monitoring main policy performance. These also include appropriate targets and triggers for consideration of policy review.</p> <p>Further implementation and delivery mechanisms will be considered at LPP stage and this may include key site requirements.</p> <p>The employment land monitor and housing monitor are ongoing measures to continually assess the provision and take up of development</p> |

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| | | land and these will also inform the LDP annual report and any subsequent policy and plan review. |
| CE4. Is the plan reasonably flexible to enable it to deal with changing circumstances? | Yes | <p>The dPS largely reflects established planning policy, which will be supplemented by SPG as set out in the document. Ongoing monitoring, as outlined above, will ensure that the policies remain appropriate and effective. This includes the statutory annual monitoring report, as well as other monitoring set out in the dPS. Should monitoring indicate otherwise, the Plan will be reviewed and amended as required.</p> <p>Notwithstanding the above, the strategic and detailed operational policies are expressed in a relatively generic form to enable them to provide a robust and consistent framework for considering all planning applications. In this regard, whilst it is acknowledged that individual policies cannot always cover every planning proposal that comes forward during the plan period, the overall policy approach is clear and provides adequate context for every eventuality.</p> <p>Decision-making will be monitored to ensure that the policies remain relevant, robust and effective.</p> |

7.0 Conclusion

- 7.1 In view of the above self-assessment, Belfast City Council concludes that its draft Plan Strategy is considered to meet all the tests of soundness, including in terms of procedures, consistency, coherence and effectiveness.
- 7.2 This document demonstrates that the dPS has been prepared in accordance with procedural requirements set out in the relevant legislation. The dPS is consistent with the RDS, SPPS, the Belfast Agenda and other relevant plans and strategies, including those of adjoining planning authorities. It sets out a coherent strategy and detailed policies, having considered alternatives through the SA/SEA process. It also sets out a monitoring framework and review process to ensure effectiveness in delivery.
- 7.3 On the basis of the above, Belfast City Council considers that the dPS is ready for submission for independent examination and hereby submits the dPS and supporting documentation to the Department for Infrastructure for examination of soundness under Section 10 of the Planning Act (Northern Ireland) 2011 and Regulation 20 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.