

Belfast City Council

Local Development Plan 2030 - 2035

Preferred Options Paper

MAG Response

20 | 04 | 17

Belfast City Council

Local Development Plan 2020 -2035

Ministerial Advisory Group (MAG) Response

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By email to:

planning@belfastcity.gov.uk

1.00 General

- 1.01 MAG was established in 2007 to advise the then Minister for Culture, Arts and Leisure, and now the Minister for Communities, on the implementation of the Architecture and Built Environment Policy.
- 1.02 MAG welcomes the opportunity to comment on the Preferred Options Paper of the Belfast City Council Local Development Plan 2020 -2035, and would advise as follows.
- 1.03 The MAG consists of an Interim Chair and 7 Members, all of whom are independent professionals appointed through the public appointments process to advise the Minister for Communities on the implementation of the Policy for Architecture and the Built Environment.
- 1.04 MAG is assisted by 21 Expert Advisors, independent professionals who, while they are not Ministerial appointees, are appointed through the public appointments process.

2.00 MAG Response

- 2.01 This response has been prepared by three of the MAG's Expert Advisors and is submitted by MAG Secretariat on behalf of MAG.

2.02 Key to Text:

POP extracts in italics

MAG observations black

MAG requested text inserts *blue*

MAG requested deletions/relocations *grey*

3.00 General Observations

3.01 Overarching Vision Opportunity

It has taken the last fifty odd years for the physical changes evident in Belfast 2017 to occur. Many of the changes implemented here (and elsewhere) have roots in visionary thinking at play as far back as the 1920s – that's nearly one hundred years ago. Our thinking today can transform this city a hundred years from now. It may well take fifty or

one hundred years to manifest but if we don't start and change our thinking it will never happen.

This LDP is the possibility of making a transformational difference. To achieve this it needs:

- an overarching long term fifty year vision that creates Belfast 2017-2067
- the vision to be created in language (words and/or drawings), as if it already exists
- prioritised steps towards realising that vision in 15 year increments, of which this plan period is the first

This methodology creates a new and better future, right now - today. needs of all relevant parties, and its possibilities are regularly communicated to them, then people of all walks of life will live into the possibility of that future. Unpredictable opportunities for action occur. All sorts of people act from their unique skill sets. Over time the future created in language becomes reality.

3.02 Need for a Step Change

Wherever we go in the world the physical environment reflects the cultural priorities of its people, past and present – all the cultural priorities. This place has been at the coalface of a serious, protracted and divisive conflict. The effects of this are evident at a glance. Other forces have been at play over the past fifty years – nothing to do with the conflict - but divisive too, in other, sometimes more subtle ways.

These include:

- Cultures of development
- Property portfolio boundaries
- Development procurement methods
- Rising private car ownership levels, and our traffic engineering responses
- Our individualistic, neo-liberal society, and

Our love affair with American models of development:

- Segregated detached and semi-detached suburbia
- Out of town or edge of town internalised shopping malls
- Mono-use business parks
- Mono-use industrial estates
- Mono-housing areas that, in many instances since the 1980s,

have been built in suburban typologies within inner city /edge of centre-city locations

It occurs that these forces have been expressed in the following ways (not a definitive list):

- 'Luxury' suburban housing developments are created in fields with one road in and one road out. The residents of one development are divided from the next by an impenetrable fence along the former field boundary. One group of people doesn't know their neighbours over the fence – nothing to do with cultural background here.
- Major road networks cut slices through once connected, integrated, walkable neighbourhoods with real community spirit
- Housing renewal (all very well intentioned) creates new worlds that undermine our deep human need to connect meaningfully with each other

A glancing look across the city of Belfast is evidence that the time is long past to effect real, meaningful change to meet the deep needs of all the people, regardless of class, culture, background, or ethnicity. The possibility exists today.

3.03 Diversity

Belfast is an increasingly diverse city and likely to remain so. The graphic presentation of this plan would benefit greatly from reflecting diversity graphically eg:

- Gender balance
- Ethnicity
- Cross generational groupings
- Cross class

4.00 **Chapter 1 – Introduction**

Plan development process

1.1 - The plan states that '*An integral part of the vision and development of the plan is that local communities and stakeholders will be fully engaged in the process....*'

MAG observation:

A key planning issue during the Troubles was the democratic deficit that resulted from planning powers sitting within central government departments. The return of planning powers to local authorities in April 2015 is very welcome progress in this regard. The creation of LDPs by all councils is a fantastic opportunity to ensure citizens are consulted using the most effective, pro-active methods of interactive engagement.

How has first stage community/key stakeholder engagement been carried out to date? What was the process? Who was consulted?

Community engagement is vitally important to ensure people's voices are heard and can feed into the creation of the plan - it is important that this takes place at an early stage and that as many sectoral groups that make up society in Belfast. There is no information on the extent of its early community engagement or the processes it employed to do that. Apart from key milestones, there is no information on the approach, methodology and processes used to create this Preferred Options Paper.

We recognise that the Council has taken account of The Belfast Agenda, the Council's community planning output. We are aware that there were 2000 responses to this, out of a population of some 330,000. While it is good that Council has taken the Belfast Agenda on board this plan is a statutory document with far reaching implications for development in this city. It is the environmental contract between the city and its physical environment for the next fifteen years. Its contents will impact on citizens for the next fifty years or more.

Were citizens' voices speaking into this LDP plan process directly, or those of other highly relevant stakeholders such as The MAG, PLACE, UAHS, RSUA the Landscape Institute etc.?

Request: please advise how this was done and who was consulted.

The Council has capacity and opportunity to facilitate and encourage active participation by developing mechanisms through groups such as the Partnership Boards or PLACE to build community capacity and a skills network to meaningfully respond to the next phase of the Plan development.

Assessment of comments and submissions

Advice on how comments and submissions by the public will be appraised and assessed, and by whom, is missing.

Request: please advise how this will be done, and by whom.

4.00 Chapter 3 – District profile

BMAP

This plan replaces BMAP. There is no reference to or review of BMAP vis-a-vis its strengths, weaknesses, or lessons learned. What is being taken forward from BMAP and what isn't? It occurs this is a major omission.

BMAP includes a wealth of material on Areas of Townscape Character, Conversation Areas, proposals for urban design principles along the arterial roads, and mapping etc - is it the intention that these will be embraced in the new plan or replaced by new 'guidelines' and policies? BMAP has already been effectively replaced on a number of major roads into the centre-city without recourse to transparent alternative policy positions.

Request: please provide your review of BMAP and answers to the questions above.

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'The majority of the Belfast district consists of a single contiguous built up urban area...'

MAG observation

There is a lot of spare space in the city. We assert the above statement is incorrect.

It [Belfast] will accommodate new residential development both, with the exact development limits to be designated at the Local Policies Plan stage.

MAG observation:

Leaving the designation of development limits until the Local Policies Plan stage is too late. If this is left until the end no one has to agree about contested neighbourhoods growing or shrinking. Void land

spaces around all the interfaces comprise c. 87 Ha of land. This is a major land bank resource. This land is, at once, both the city's biggest liability and the city's opportunity. Turning its opportunity into possibility and, thence, reality must be grasped with both hands. Failure to do so will damage the city and jeopardise its future. A courageous Belfast City Council Planning Department acting as a transformational leader is the possibility of bringing this land back into full use for the benefit of citizens and communities, of all backgrounds.

3.2 Spatial characteristics and settlement hierarchy

Belfast is the capital of Northern Ireland and lies at the heart of a wider urban metropolitan area that dominates the east of the region. It drives much of the economic growth across the province [delete: and shares its wealth across the region]. Given this strategic location, the Belfast Metropolitan Area is the major gateway to NI and the primary administrative, retail and commercial location within the region. It has been the key driver for an improving regional economy and will continue to play a strategic role in the future economic growth and development of NI. The RDS therefore aims to “strengthen Belfast as the regional economic driver”, recognising that “successful regions have strong and vibrant cities at their core”.

MAG observation:

It occurs that the fact that the Derry City and Strabane District Council region registers the highest unemployment ratings across several indices in Northern Ireland, and is among the highest in the whole of the UK is an indication that the proposed statement above 'and shares its wealth across the region' is not entirely true. The reality is that lack of jobs in Derry~Londonderry and good bus service connectivity is generating not insignificant commuting to Belfast for work.

We in Northern Ireland have an opportunity to learn from experiences in the Republic of Ireland, where Dublin's unbridled growth has been the death knell for numerous towns in the west of the country – to the extent that these are in collective crisis. From a regional strategic spatial perspective (and particularly in the context of Brexit) it occurs as important for this LDP to take account of, recognise and state the relationship between Belfast, as the capital city of Northern Ireland, with Derry~Londonderry – the regional economic driver in the northwest and other smaller towns across the region. This is particularly

important in the context of determining the strategic extent of Belfast's growth. It is vital that this is realistic and managed so that Belfast's growth is not at the expense of the life's blood of urban settlements of all sizes (and countryside) in our western counties.

We note that in many regards the Regional Development Strategy continues the work of the 1969 Matthew Plan which hallowed the city of Belfast; planned for the growth of the commuter belt around the city and built the new 'city' of Craigavon. The 'plan' to grow the population of Belfast is either at the expense of somewhere else or is strategically not, as such, a zero sum proposition. But if so, it is not at all clear how the growth of population is facilitated or accommodated, in terms of clearly defined or tested areas for development?

3.3 Summary of key opportunities and challenges

Belfast has witnessed a revival in recent years in terms of inward investment, including significant regeneration within the Titanic Quarter and waterfront areas, major growth in tourism and the Ulster University redevelopment in the city centre. However, there continue to be a range of issues that inhibit the ability of the city to fully function as one of the main urban centres in Europe. See MAG observation below.
Name: the elephant in the room *There are areas of the city that are fractured, disjointed and poorly presented. There are infrastructure and environmental constraints, such as traffic congestion and poor air quality.*

MAG observation:

Name and address the major elephants in the room ie:

1. the effect of the conflict on the physicality of the city
2. the implications of climate change for future development

Wherever you go in the world the physical environment reflects the predominant cultural norms, collective world-view and social organisation of its people, past and present. Belfast is a reflection of a place that has been physically brutalised by nigh on forty years of conflict. In October 1943, Churchill said 'We shape our buildings and afterwards they shape us.' It seems fair to say the same is true of places. If this is indeed true then long after the cessation of day-to-day violence and destruction our remaining, physically brutalised, places and spaces in the city – and their cultural divisions - continue to

brutalise us, psychologically and socially to the serious detriment of our wellbeing.

We request the insertion of:

This is a city emerging from conflict. Great possibility exists to heal, reveal and co-create authentic beauty in places, people; and the relationships between them. These possibilities include healing physical destruction, division (of all kinds), and re-making distinctive, connected neighbourhoods, where these have been erased from the city's landscape, in ways that reconnect people to people, and generate delight for all those living and working in the area - bridge-builders, rather than wall-builders.

There are opportunities to reconnect the city, undo disconnection and the physical lock down reality, to improve public transportation networks and extend service provision. This would be achieved by creating a new context within which these possibilities can occur. Actions flowing from such a context include a commitment by Belfast City Council planning authority to pro-actively support: [~~delete:~~ could be encouraged by promoting appropriate]

- the repair, retention and re-connection of existing urban contexts already offering physical conditions for meaningful connection with our fellow citizens eg. collective built heritage (listed and unlisted)
- excellent urban design
- landscape architecture
- innovative, creative, well judged architectural interventions.
- re-opening and re-connecting of smaller routes - this would benefit transport as a whole. The public transportation networks essentially follow the radial structure of the city but opportunity does exist to organise a circular public route that could connect key areas of employment, housing and neighbourhood centres. There is certainly option to improve walking and cycling circular connections.

In all of the above would represent exemplary conservative repair and contemporary 21st century design, and make a positive difference to the wellbeing of all the people in Belfast.

Stitching the city back together sees new interventions and developments that increase permeability in the city, [to make the city more permeable] and prioritise pedestrian movement, whilst also achieving integrated tangential and radial vehicular movement. There is enormous scope to create new green routes to the city - building on the success of the Lagan towpath and Connswater Greenway. In certain situations shared movement will be supported - excellent examples include: Exhibition Road, and Seven Dials in London, and Bohmte, Germany. [delete: aid both vehicular and pedestrian movement]. New development could be encouraged along routes re-connecting the city centre to inner-city neighbourhoods. [delete: that are currently poorly integrated with the urban core.]

There are opportunities through planning and regeneration processes to increase equality of opportunity and contribute to a knitting together [delete: breakdown] of the physical aspects, and healing of the psychological effects [delete: aspects] of division.

MAG observation:

It must be said much of the city's physical division has nothing to do with the conflict and a lot to do with 20th and 21st century development cultures such as:

- Creation of segregated suburban housing in former fields, with one road in and out – these are severed from adjoining suburban housing development by impenetrable fence following the field boundary.
- Standalone single use developments including:
 - edge of town/out of town shopping centres surrounded by seas of surface car parks,
 - business parks - some US examples have suggested alternative development models failed business parks and retail development areas - these have embraced residential typologies.
 - industrial estates
 - new schools set in their own grounds surrounded by palisade fences etc.

c. 87 Ha of unused land exists at interfaces. There is an opportunity to plan for regeneration that [delete: seeks to] re-uses this valuable land asset (thus reducing future need for utilising greenfield land) for the creation of new distinctive, connected neighbourhoods, laid out as

21st century streets. This transforms [rejuvenates] interface areas and takes the place of [facilitate the removal of] barriers to pedestrian and vehicular movement, and other forms of infrastructure or built development [architecture] that [serve to] have, up until now, reinforced patterns of division within the city. There are opportunities to promote development of shared spaces (old and new), sites and facilities that provide safe access for all of the community and have potential to foster greater levels of social integration.

5.00 Chapter 4 – The Vision and objectives

5.01 Q: Do you agree with the LDP vision?

A: No.

MAG observation:

The aspiration to achieve a globally successful city is laudable though challenging. It is hard to see how a city of c. 333,000 people (equivalent to Bolton) would compete with say, Mexico City or Tokyo. This occurs as overblown. By contrast relevant place specific issues that urgently need to be addressed - and can be - by an inspired LDP, are not mentioned. These include:

- Environmental division and decay;
- Loss of inner city connected neighbourhoods made of streets (not roads);
- Citywide socio-cultural segregation across the city (a substantial amount of it nothing to do with the conflict)
- De-territorialisation of areas
- The pressing need to respond to our climate change commitments.

There is enormous scope to recast the *Local Development Plan Vision* statement so that it becomes place specific, truly aspirational, and creates a context for transformational, beneficial change for all. Well worded, a vision statement with strong ideas that create a future of distinctiveness, connection, quality and excellence can be inspiring in itself. When an inspiring vision is consistently presented and well communicated to all relevant parties, and is found to meet their needs, magic happens. People, of all kinds, live into the possibility created. We request that this vision statement be written in the present tense – a more powerful use of language – because it creates new contexts and possibilities right here and now. Key actions will align behind the

possibility as stakeholders live into that. We request that this be re-worded and offer the following possibilities:

5.02 Our Vision

It is 2030. Belfast is a socially, economically and environmentally resilient 21st century regional city, attractive to people of all ages, as a great place to live, work and visit. Successful, dynamic, and smart - distinctive, connected socially and culturally mixed neighbourhoods are home to people of all creeds, class, and colour. Neighbours know each other well enough to call in for a cuppa now and again or, perhaps, send out a Mayday call in an unexpected personal crisis. Community spirit is soaring everywhere. And 20th century and early 21st century interfaces are a thing of the past.

The local economy is booming across the city's neighbourhoods and sustaining well. Neighbourhood high streets are full of locally owned and run independents, offering just about everything. People are back living over the shop – and the streets are vibrant all day and well into the evenings with the comings and goings. So it all feels really safe. All sorts of entrepreneurial enterprises (social and profit making) tucked away in nooks and crannies, provides everything the average household needs day-to-day. And at affordable prices too. The city centre is the place to go for those one-off purchases requiring that wee bit of 'touchy feely' checking out - like your new sofa or oven. The Neighbourhood Allotments and Community Gardens Initiative is hugely popular, providing locally grown fresh produce for low-income (and high-income) people during spring and summer. More importantly, this initiative has been an invaluable cross-cultural, cross-class community building and skills development vehicle. Used by everyone, old class and cultural divisions are no more.

All these sustainable businesses and enterprises harness the creativity, talent, and expertise of locals and incomers alike, from across Northern Ireland, the Republic of Ireland, and well beyond. Unsurprisingly the city's tourist economy is going from strength to strength thanks to our effective inter-regional working with Northern Ireland's other major tourist destinations including: the Giant's Causeway UNESCO World Heritage Site, Mourne, Derry's walled city, the Fermanagh Lakeland, Causeway Coast and Glens and Sperrins AONBs. The two-way flow benefits from excellent 21st century sustainable transport connections. Particularly significant is the high-speed half hourly Cork -

Derry~Londonderry rail link via Belfast and Dublin – opened in 2018. Now the millions visiting the *Wild Atlantic Way* and Derry's walled city include Belfast – and vice versa. And new business collaborations have sprung up all over the island – to everyone's benefit.

We love our wide-open natural spaces and chill out in our expansive hills, historic parks, as well as on and beside the Lagan and Belfast Lough. Mecca for children, young and old is our network of superb parks and play areas. Linear greenways created along arterial routes - a transformation of all those old, inhuman, dual- carriageways like Cliftonpark Avenue - have been a rip roaring success. The old roads have been de-engineered, some as streets, others as greenways. All now put people, rather than cars first. 'Green transport' like biking and walking are the way to go. Made possible by the consolidation of *Rapid Transit* and other sustainable forms of public transport, plus the introduction of car toll charges, travelling to work has become a pleasure; and the city centre is buzzing with walkers and cyclists heading east and west across the new Docks Footbridge – an RIBA Stirling Prize winner. Our pièce de resistance has been the world class, award winning and well used Yesterlink urban park. It's where Westlink used to be – well, Westlink's still there just under the park.

There's been a step change in our attitude to all those 2017 boarded up old buildings – we really love and value these enormously - especially our unique collections of modest historic terraces. Sensitively repaired and retrofitted by master craftsmen and women, under the guidance of highly skilled conservation professionals, these are the bedrock of our 2030 distinctive, connected communities and neighbourhoods. Their authenticity helps tell the city's story of times gone by. A welcome by-product has been a robust revival of the traditional buildings skills and craftsmanship that built our fine industrial Victorian city - now maintaining it for the next generations. People, young and old, love where they live. Everyone loves Belfast.

This transformational change was made possible by the collective inspired leadership demonstrated by Belfast City Council's Planning Authority's transformational vision, guidance and support for the repair, re-use and re-creation of our new and better place. Throughout it all, the people were positively engaged in a series of strengths based, possibilities oriented inquiry and co-creative visioning conversations.

Building on our strengths past and present, - like our built and natural heritage assets - we collaboratively created a new and better future in language, meeting the needs of everyone. Quite unpredictable, almost magical actions followed. Over time the future we created back in 2017 has become today's reality.

5.03 Shaping a liveable place

Promoting development that enhances the health and wellbeing of communities, neighbourhoods and places.

Q: Do the aims and objectives strike the right balance between social, economic and environmental considerations?

MAG observation:

At present macro and economic considerations dominate. It occurs we are a society not an economy. Though there is reference to some environmental factors we request that the plan gives much more serious attention to the most critical matters eg. climate change; and waste reduction measures. We request a much greater emphasis on reducing private car usage and increasing public transport capacity, and attractive straightforward opportunities for walking and cycling. On social wellbeing considerations, it is almost silent. At a local (micro) level the plan would be strengthened by foster a local high streets economy, and walkable, workable mixed use residential neighbourhoods – old and new, with business and other community education and leisure uses knitted in.

It occurs that if our requested insertions and deletions below are incorporated then a good balance would be achieved that, in time, would make a difference.

Q: Are there any issues that we have missed from our vision, aims or objectives?

See MAG observations below:

We request blue text is inserted. Grey text is to be deleted (or relocated where noted).

The LDP will [delete: seek to] support the development of well-designed distinctive, connected, sustainable, diverse, inclusive

Neighbourhoods, *[delete: which are..... and relocate: well designed];* and to provide a sufficient supply and choice of homes, designed to the highest sustainability/design codes and Passive Haus standards, that will attract and create belonging *[delete: provide]* for the city's growing and diverse population. Integrated into the neighbourhood street networks *[delete: The Neighbourhoods]* will be *[delete: accessible to]* a range of accessible services and facilities, which will provide opportunities to improve health, wellbeing and quality of life for everyone.

We *[delete: will try to]* protect, care for, repair, re-use, and manage Belfast's built heritage, either by returning buildings to their original use or finding *[delete: whilst also supporting]* compatible innovative new uses, and ensuring^[e] that new developments enhance^[s their] distinctive character and features of built heritage whilst simultaneously *[to contribute to]* contributing to the evolving identity of local places.

The following objectives have been set along with the preferred options to achieve Belfast, a sustainable place:

1. To grow the population of Belfast realistically and sustainably, without impacting negatively on other urban settlements in Northern Ireland, and connect with other cities across the UK and Ireland in supporting a greater level of inward investment.
2. To address current and future residential needs through ensuring vacant buildings, unused, underused land, backlands, brownfield land within the city's development boundaries are prioritised to *[sufficient suitable land is available]* to meet future requirements, and that new residential development is of *[an appropriate]* the type, size, tenure and mix necessary to meet the city's household sizes and range of income needs. Particularly we will encourage and support new residential development that creates state of the art, contemporary 21st century terraced housing laid out to traditional street networks typology, thoroughly connected to surrounding street networks.
3. To promote and deliver high quality design by including policies to protect and enhance the built environment and^[that] foster^[s] local distinctiveness.

4. To improve community safety and reduce the potential for antisocial behaviour or crime through an approach to new development focused on design quality, retention of existing mixed use historic streets (both inner city) and in the neighbourhoods and, where these have been lost, the creation of contemporary 21st century mixed-use terraced street developments laid out on the typology of street networks, thoroughly connected to surrounding street networks.

5. To improve access for all groups in society to public services through the design and location of new development integrated into existing or new streets ie. as attached buildings sharing party walls – both in the city centre and neighbourhoods.

6. To protect, care for, repair, re-use and enhance the historic environment through effective planning management and supporting [of] proposed heritage repair, adaptation, and re-use proposals, and ensuring high quality sensitive design for new development, public realm and landscaping proposals. [delete:and ensuring high quality design].

5.04 Strategic Aim: Creating a vibrant economy

A strengthened Belfast as the regional economic driver.

Belfast is an important economic gateway for Northern Ireland with a thriving port, and its role as the administrative capital city. In support of the city and city centre's role major employment location, there will continue to be a mix of residential, retail, leisure, businesses, financial services, higher education, tourism, and other supporting functions appropriate for a regional city.

7. To maintain a strong and growing economy by ensuring existing vacant buildings, unused, underused land, backlands, and brownfield land within the city's development boundaries are prioritised to provide a range of suitable sites for employment uses [delete: are available] and able to be developed to meet the future growth of the economy and employment.

8. To support the local economies by promoting use of existing vacant buildings (particularly heritage), unused, underused land, backlands, and brownfield land to provide adequate [development of] suitable

land and buildings for residential, retail, leisure, office and commercial uses within the city centre and neighbourhoods [delete: district centres] ensuring the future needs are addressed and their [delete: continued] vibrancy and viability increased [delete: maintained].

9. To strengthen the potential of local tourism assets and the development of suitable tourism infrastructure, cultural facilities, and accommodation for this important sector of the economy.

10. To support the connectivity and the continued regeneration of disadvantaged and deprived areas.

5.05 Strategic Aim: a smart connected and resilient place

Improving connectivity supporting the efficient movement of people, goods, energy and information to create a dynamic innovative 21st century city attractive to residents, investors, businesses, [relocate: residents] and visitors. Prioritise measures to ensure the city's reduction of carbon emissions by 30% by 2030, and strongly support measures designed to: reduce reliance on the private car; and transition to a low carbon city. [delete: adapts to and, encourage the capacity for adaption to environmental challenges and the transition to a low carbon city]

We will support an efficient integrated public transport network offering travel choice that minimizes private vehicle usage, congestion and pollution. Encourage expansion of green infrastructure networks for walking and cycling to encourage active travel and improve air quality. Promote increased use of public transport by supporting measures to reduce the use of private cars in the city centre. [delete: retaining suitable provision for cars]. Facilitate a Smart Belfast where we can harness the city's digital infrastructure, open data, our data analytics and research capacity to create excellent services for our citizens.

The LDP will encourage development of renewable energy networks to build capacity and security. Promote innovative building technologies to improve efficiencies to create competitive advantage for businesses

The plan will encourage the development of renewable energy in the city, particularly solar power and district co-generation - allowing for district heating systems to be developed at a range of scales to share demand and resources. These district systems of heating (and cooling) will offer competitive environments for businesses to thrive in by reducing operation costs and fossil fuel dependence.

Encourage the creation of business (and other) facilities as integrated elements within street typologies and/or neighbourhoods and support applications whose *[delete: the] design [delete: of] to Passive Haus and sustainable design codes* creates fossil fuel free and energy efficient housing and other developments. This *[delete: to]* helps alleviate fuel poverty and facilitate development of a circular economy to manage waste and support the creation of jobs.

We will strongly support proposals that reduce Belfast's carbon footprint, reduce carbon emissions by 30% by 2030, and encourage adaptation to emerging environmental challenges. We will *[and]* mitigate flood risks through ensuring new developments are not sited on the floor plain and/or incorporate design solutions to protect property and occupants from the risk of flooding where such siting may be unavoidable, and support improvements to green and blue infrastructure networks. Manage development within areas of risk and ensure the design of new development reduces future risk from flooding. Encourage flood resilient design to build the city's resilience for future generations.

11. To build stronger, *connected people and communities* by protecting and improving social, economic, green, digital and physical infrastructure through supporting its development and enhancement, and through securing contributions from new development.

12. To identify *existing vacant buildings (particularly heritage), unused, underused land, backlands, and brownfield land* to ensure availability of land to facilitate sustainable patterns of development and, *prioritise proposals that promote travel by more sustainable modes of transport-rail, cycling, walking.*

13. Address the local elements that could contribute to addressing the wider environmental challenges before us inherent in climate change, through ensuring new development is designed to minimise carbon emissions by 30%, use resources efficiently, and be resilient to longer term implications i.e. use resources efficiently and help develop resilience to future shocks, such as fuel prices rises or climate change.

14. Adapt for the potential implications of environmental changes through management of development within areas of flood risk and designing new development, its drainage systems, and hard landscaping to substantially reduce future risk from flooding.

15. Encourage a zero waste approach through separation of waste at source, and that new development minimises the production of waste, and facilitates and supports recycling

5.06 Strategic Aim: a green and active place

A protected, enhanced and attractive natural setting, reinforcing uniqueness and accessibility to all who live work and enjoy the city.

17. To support healthy lifestyles through ensuring existing street networks re-open, and new developments create interconnected, walkable, neighbourhoods comprised of street typologies; and sufficient land availability for accessible play (particularly for children), sport and recreation opportunities.

18. To protect, enhance and link the natural environment and biodiversity by managing [~~delete: the location and~~] design of new development, and ensuring the integrated, interconnected locating and design of communal green spaces, new and adjacent parks, and linear greenways .

19. To protect and conserve the natural asset of Belfast's countryside, coast and hills by discouraging [~~delete: managing~~] proposed development in sensitive areas and ensuring that, where this is not possible, its design is sensitively handled in scale, form, massing, materials and colours – whether that be buildings, roads and other infrastructure, public realm and landscape architecture.

6.00 Chapter 5 – How will we grow Belfast?

- Belfast's economy supports nearly 30% of all jobs in NI –
- Belfast contributes over a quarter (28%) of NI's total productivity
- Between 2001-2015 Belfast's population grew by 2.47% while the NI population grew by 9.6%
- Belfast's population declines over 33% from 1971-2011 while the NI population increased over 18%

6.01 GR1 – Supporting economic growth preferred option

LDP policies will be based on ambitious growth aspirations, with appropriate population growth, employment land and residential development delivered to help Belfast compete with other cities across the UK, supporting a greater level of inward investment and strengthening the regional economy. This means over the plan period the LDP will:

- *Ensure a supply of sufficient employment land to support the creation of c. 46,000 additional jobs;*
- *Seek to grow Belfast's population by 66,000, increasing the population to over 400,000 by 2035; and*
- *Make provision for the development of 37,000 new homes, delivered at an average rate of 1,600-1,800 dwellings per year, phased to align with infrastructure capacity and provision.*

Q: Do you support Belfast's aspirations for a higher level of growth to help drive the regional economy?

MAG observation:

While supporting Belfast's aspirations we cannot support the 46,000 level of population growth proposed. In the current economic and public spending context we advocate a steady state approach, both population and economic growth. It is important that Belfast's growth does not occur at the expense of population numbers in other settlements, large and small, across Northern Ireland. If this were to occur there is substantial risk of their socio-economic viability and sustainability being undermined. See our observations below.

It occurs for us that this question is framed in such a way as to foster a 'yes' answer by many. Like mother's milk – people will support anything that sounds like it is going to result in a better economy. We support realistic sustainable growth and have concerns about the rationale for the projected 46,000 population increase. This does not seem to be sustainable, either in the context of Belfast but also its impact on the rest of Northern Ireland. Steady state growth based on current 2.47%

growth statistics translates into an additional 8, 371 people and we are querying the basis for setting population growth at 46,000. If the projected additional 37,629 people are not to be drawn from other settlements in Northern Ireland then it begs the question 'where are they going to come from?' Brexit is closing the door on incomers from EU countries. EU nationals already resident in Belfast, elsewhere in NI and the rest of the UK, are very uncertain as to whether they will be allowed to stay on after Brexit. Some are already leaving.

For all these reasons we consider that population growth to this extent is over ambitious as far as in-migration from abroad is concerned and, potentially damaging to the socio-economic viability of other settlements in Northern Ireland. It occurs that the wish for more growth is not a strategy. No consideration has been given to indicate how such growth could be accommodated that doesn't rely, in part, on meagre and unsustainable typologies that include the current fad of 'private rented sector' accommodation. PRS private rented sector is 'designed' to exclude those seeking social housing and is planned around 6 to 8 storey light wells that require bedroom windows to be set high in the wall to prevent direct gaze in to the opposite bedroom only 8 metres away. Such a larger Belfast does not augur well for the increased inclusivity, and/or enhanced community spirit or wellbeing desired in other parts of the LDP. We request a steady state projection.

Q: Will the level of growth proposed enable the city to better compete with similar sized cities elsewhere in the UK and Ireland?

MAG observation:

We do not agree that the level of population growth proposed is sustainable or achievable in the time frame of this plan, or that it would wave a magic wand across Belfast's competitiveness with similar sized cities in the UK and Ireland.

Belfast is insufficiently connected, particularly by air etc. to attract and/or better compete with, major global industries – it's a case of Dublin (Frankfurt, Munich etc) versus Belfast. As above Brexit is closing the door on incomers from EU countries. EU nationals already resident in Belfast, and elsewhere in NI and the rest of the UK, are very uncertain

as to whether they will be allowed to stay on after Brexit. Some are already leaving.

We ask 'What sort of jobs and what sort of city does Belfast envisage?

It occurs that investment in education is the best way to grow an economy – since a skilled workforce is key. Yet, investment in education in NI is reducing. In this context it is difficult to see how the city's economy would grow to the extent that 46,000 people would need to be accommodated.

Q: *Would the availability of an increased number, mix and type of new homes in appropriate locations, including affordable housing encourage more people to consider living in the city?*

Increasing the number, mix and availability of new homes is not the basis for more people to consider living in the city. We only have to look at whole housing estates lying empty in the Republic of Ireland after the economic crash and austerity measures.

It's more realistic to set population growth rates at the present 2.47%, or slightly above. This ensures that projections for additional housing, and other services and the land necessary to accommodate them, are sufficient. Over-provision of zoned land and/or housing distorts the market. Of course, too little provision pushes property prices up out of reach of the average citizen. Looking over our shoulder at the recent experiences in the Republic of Ireland is a sobering reminder of a context Belfast, and its citizens, don't need.

7.00 Chapter 6 – *Shaping a Liveable Place*

7.01 LP1 Accommodating new homes preferred option

In order to support the ambitious growth aspirations for the city, the LDP will allocate sufficient land to accommodate 37,000 new housing units during the Plan Period in accordance with the following priorities:

- *Increasing the density of housing development across the city of Belfast, focusing the highest density of development on the city centre and other locations which benefit from high accessibility to public transport facilities;*
- *Prioritising the re-use of previously developed land by setting an appropriate target for housing development on 'brownfield' land*

and encouraging the redevelopment of appropriate locations to contribute to urban regeneration;

- *Concentrating growth within the existing settlement limits of the Belfast city urban area;*
- *Identifying opportunities for developments on the edge of settlements, but avoid any development in areas that could lead to the coalescence of our small settlements into the larger urban area; and*
- *Restricting housing development in the open countryside.*

MAG observation:

We do not support the level of population growth proposed. This appears to be neither achievable nor is sustainable nor in the time frame of this plan. We are requesting steady state population growth.

Increasing the density of housing development

Densities should be high across the city, but can be slightly higher in the city centre, and at public transport hubs and neighbourhood 'high streets'. We support:

- 2/3 storey terracing in neighbourhoods
- 3/4 storey in city centre and neighbourhood centres.
- 4/5 storey at public transport interchange hubs
- 5/6 storey in city centre core

We request that Belfast City Council Planning Authority commission a serious comparative study of inner city and suburban areas to measure:

- A spatial analysis on what has already been built /delivered
- Number of homes/Ha
- Average income per household
- Disposable income /ha

This would identify the relative densities of existing new development over the previous plan period, the extent of unused land, and help determine the level of economic activity that can be sustained by particular densities against the socio-economic profile of the neighbourhoods and the city as a whole. This would be a sound basis on which to determine optimum housing densities.

These measured outcomes will give a flavour of the personality of economic and retail/hospitality provision that could be supported by a given neighbourhood density/housing typology mix.

We request the insertion of:

The plan will support and encourage optimum housing densities of 50/60 dwellings/Ha in all new residential developments, and proposals for interventions in existing residential areas that consolidate and increase their existing residential densities to achieve densities of the same order.

Brownfield land

We support the location of new housing on unused and underused backlands, brownfield lands, and also the re-use of vacant buildings both houses and other types of buildings anywhere in the city – especially where this represents built vacant, semi derelict or derelict heritage.

Increase Belfast's resilience

Request: a citywide audit to map pre-1960s vacant residential buildings (and other building types) – including listed and unlisted heritage.

This would reveal the number of properties already available for re-use to meet projected housing need, and potential for Belfast to increase its capital spending resilience. This offers possibilities for reducing:

- Capital spend on social/new build housing and/or:
- Demolition and re-building costs on brownfield lands (where buildings exist)
- Saving embodied energy already locked up in the city's existing vacant houses.

Use of such existing vacant stock to meet the demand for new housing (or some of it) reduces overall projected new build housing load.

Audit mapping categories would include:

- Condition (prioritise repair against four categories:
- At risk
- In need of maintenance
- Architectural value

- Develop, communicate and promote costed, designed, development case study exemplar illustrating various adaptation and re-use housing typologies tailored for different segments of the market

Concentrate growth within Belfast's settlement limits

Yes, strongly agree.

Identifying opportunities for housing developments on the edge of settlements

In a city that has c.87 Ha unused land/properties in and around interfaces alone, we see no need to identify opportunities for housing developments on the edge of settlements;

Request: that this not be permitted

Housing in the countryside

We agree that housing in the countryside should be very restricted – it is an unsustainable living pattern unless the applicant works in the local rural context.

Sequential Approach

Step 2 - Identify opportunities for small scale expansions to Belfast City as a last resort

MAG observation:

We do not support this at all.

Step 3 - Protect the distinct character of the District's Small Rural Settlements by preventing any development that could lead to coalescence.

MAG observation:

We see no need for and do not support exceptional major expansions of villages or small rural settlements. We agree the character of the district's small rural settlements should be protected and there should be no coalescence.

Step 4: New settlements

MAG observation:

We agree there is no scope for new settlements within the Belfast District.

MAG Request: insert a new Step 2

Step 2 - Consolidate existing neighbourhood high street contexts. Increase density where possible, and create new neighbourhood high streets where such do not exist:

1. Consolidate and protect existing neighbourhood street contexts as follows ie:
 - 2/3/4 storey – ensure adequate external space is provided between terraces - we request that you provide supplementary guidance on this (BMAP referred to workable distances under the Areas of Townscape Character sections. In Dublin et cetera separation distances and back-to-back dimensions are quite specific. The matter of spaces and dimensions from footpath to private space to dwelling entrances in high street and residential side terraced street contexts has a range of options. Levitt Bernstein (and others) has undertaken good guidance work in this regard.
 - Ground floor retail/hospitality
 - Living Over the Shop (separate entrances)
2. Intervene to create such where existing neighbourhoods don't have this

MAG Request: insert a new Step 3

Step 3 - Consolidate and further develop mixed-use and residential terraces of interconnected street networks, off the neighbourhood 'high street', to function as fully permeable walk-able neighbourhoods.

Ensure housing for the elderly is within 10 minutes walk from a neighbourhood high street

MAG Request: insert a new Step 4

Belfast is the most polluted part of Northern Ireland. Radical change on private car ownership is needed. Imagine life without cars.

Step 4 - Downgrade four lane carriageways and increase cycle lane provision

- Replace two of four carriageways with cycle lanes eg Ormeau Road etc.
- Support community owned electrically powered and hybrid car rental enterprises in neighbourhoods

MAG Request: Insert a new Step 5

Step 5 - Increase play provision for children

- Design into new mixed-use terraced street's walkable neighbourhood's safe and attractive integrated play facilities for children:
- home zones
- pocket parks etc

Q: Do you agree that new development should focus on the city centre and other accessible locations in preference to other previously developed or 'brownfield' land within the city?

MAG observation:

No, new development should make use of other previously developed or brownfield land within the city – see previous notes on other suitable property and vacant land typologies

Q: Do you agree that new housing development should be restricted in the countryside?

Yes, completely especially in this Council region.

Q: Should a proportion of all new homes in larger developments be affordable?

MAG observation:

We agree with LP2.

Yes – 20% seems reasonable.

We see no reason why this should not also apply to smaller residential developments. There is also a need to consider tenure mixes that include social, affordable and others. In the past Belfast City Council agreed a 20% target for social housing but neglected to also include affordable. It is important in this LDP that in providing for 'affordable' the social and others are not left out. Other cities have much higher (and indeed lower) social housing percentages in each, and every development.

We question the suggestion from DSD that '10-20% contribution as land rather than units is probably achievable in Belfast' see page 27 - this could result in no social and/or affordable housing at all. We do not support this latter proposal.

Q; Will our proposed approach ensure an appropriate mix of housing - in terms of size, types and tenures - for the city?

Proposal to adhere to PPS 12 Policy HS4

MAG observation:

We do not support the proposal to adhere to PPS12 Policy HS4. We request a substantial increase in the percentage of terraced housing created (2 or 3 storey). Housing sizes need to cater for smaller household sizes and single living as this category pertains in Northern Ireland.

Suburban detached and semi-detached houses are land intensive, unsustainable and create conditions of social disconnection. The percentages allocated to these should be substantially down graded – if not eliminated.

Research by BRE Vacant Dwellings in England: the challenges and costs of re-use 2010 revealed that a higher percentage of flats and apartments than privately owned dwellings are vacant, partly because people prefer houses. We should avoid creating the vacant dwellings of the future – decrease the percentage allocations to flat and apartments.

7.02 LP4 – Specialist accommodation for older people preferred option

The Local Development Plan will contain specific policies to address the most acute needs of the community as identified in an up-to-date strategic housing market. This will include:

Homes for older people – Setting locational criteria to ensure specialist housing for older people, including retirement villages and care-related facilities, will provide ease of access to relevant services and facilities such as shops, public transport routes and health facilities. Proposals will need to be accompanied by evidence that the homes or bed spaces meet identified community needs.

Lifetime Homes – Requiring an appropriate proportion of new homes on strategic housing sites to be built to Lifetime Home standards so that they are adaptable enough to match changing needs of people throughout their lifetime.

Q: Do you agree with the specialist approach taken to specialist housing for older people?

A: No.

MAG observation:

The trend towards specialist sheltered housing and retirement villages for the elderly is a matter for concern. This isolates and segregates a generation away from the rest of society. It is unnatural to isolate any age grouping from the others.

We request instead a model of integrated walk-able neighbourhoods for everyone. These are comprised of terraced residential streets off a mixed-use neighbourhood high street offering the following uses:

- Residential (living over the shop)
- Ground floor local independent retail
- Doctors
- Dentists
- Shoe repair
- Cafés
- Restaurants and pubs

This context serves everyone else and aging people too. Attached housing in the form of a 21st century version of terraced streets creates the context for connected communities and the sort of neighbourliness that allows aging people to remain in their own home, perhaps forever, but at least until severe mental/physical illnesses arrive and the inevitable end of life decline manifests.

Q: Will our proposed use of the Lifetime Homes Standards ensure an appropriate supply of homes for children, older people and those with physical disability?

A: No.

MAG observation:

Lifetime homes are needed for everyone – not just the elderly. Most elderly people do not wish to move at what can be their most vulnerable stage of life, from the familiar surroundings of their family

homes, and neighbourhoods to a new lifetime home, however accessible it is. In many cases such a move can precipitate their demise.

To overcome this people should have a lifetime home from a much earlier stage in their life, preferably from the stage of life when they acquire/rent their first proper home as an independent adult.

We request that the appropriate allocation of new homes to this category should apply to all new homes.

7.03 *LP5 - Traveller accommodation preferred option*

Q: ***Do you agree with the proposed approach to traveler accommodation?***

A: Yes.

7.04 *LP6 – Shared housing provision preferred option*

The Local Development Plan will seek to pro-actively manage the future supply of Houses in Multiple Occupation (HMOs), flats or apartments and Purpose Built Managed Student Accommodation (PBMSA) to ensure that mixed and balanced communities continue to be delivered and maintained. Specifically, this approach will include:

- General policy provisions to ensure that the established character of existing residential communities is protected;
- Limiting the number of HMOs and flat conversions allowed in specific areas of the city that are experiencing problems associated with the over-proliferation of these intensive forms of housing;
- Identify locations that are best able to support more intensive forms of housing; and
- Introduce a new criteria based policy for the assessment of PBMSA applications.

Q: ***Should the LDP seek to manage the conversion of houses into flats, as well as HMOs, in specific areas of the city?***

A: Yes.

MAG observation:

There is a need to spread students around the city much more. This is even more necessary with UU Jordanstown's move into the city centre. This shift will require a review of HMOs, and house conversions to flats. In Edinburgh they are undoing the HMO and returning flats to single family homes. Could this be done for the Holyland area?

Q: *Where does the LDP need to actively manage concentrations of shared housing?*

A: Students do not want to be the buffer in interfaces so locations need careful consideration. We query the proposal that there should be concentrations of shared housing. It occurs that concentrations are part of the problem. Set a maximum percentage of such housing in a given neighbourhood. Students should be integrated with everyone else (diluting the effect) – and a culture of respect for all those living in an area fostered. This is the case within inner city residential neighbourhoods beside UU Magee.

Car usage by students is enormous.

Request: As part of a broader policy to reduce reliance on private car usage, set an objective to have all students out of their cars by 2020- remove parking for students from campuses and city streets. Use electronic tagging for enforcement.

Q: *Do you agree with the criteria based approach proposed in relation to quality design in residential developments?*

A: No.

MAG further observation:

It occurs that assessing good design by ticking boxes is a sure way to end up approving something that meets all the criteria below but looks ugly and unattractive in the flesh, perhaps because of its scale, form, massing, materials, colour, proportions etc.

We request the creation of a Belfast City Council, City Architecture, Conservation and Urban Design department to guide clients, applicants, their design teams, and developers on design quality from the earliest stages of design and well before PADs or submitting an application. Belfast City Council did have this ambition and indeed repeated this year after year from 2000 until the then Director of Development left the organisation. Council has requested help to establish a 'design review panel' as recently as two weeks ago. Even a City Architect with a diverse skills set encompassing the above disciplines would be a major step in the right direction - though the

scale of the city, and breadth of issues really would require a full team with a broadbased high level skill set.

Additionally we request the insertions in blue text and deletions in grey below

7.05 LP7 – Quality design in residential developments preferred option

Our preferred option is to set out a single criteria based policy to ensure quality in all residential development. This will ensure that future housing developments respect the surrounding context and are appropriate to the character and topography of their specific site in terms of layout, scale, proportions, massing and appearance of buildings, structures and landscaped and hard surfaced areas. The Policy provisions should also ensure there is no unacceptable adverse effect on existing or proposed properties in terms of overlooking, loss of light, overshadowing, noise or other disturbance.

This overarching policy approach will complement the general approach to good design addressed under the design and heritage aspect of the Council's Preferred Options Paper, but will introduce criteria and related guidance specific to housing development, such as:

- *Fostering the creation of high density residential neighbourhoods of interconnected 21st century residential terraces laid out on a street network, all accessed from a mixed-use terraced neighbourhood high street*
- *Meet the design criteria laid down by the ancient Roman architect Vitruvius:*
 - *'Firmness' - ie. should be structurally sound and well ordered*
 - *'Commodity' – should serve its intended purpose / function well*
 - *'Delight' – the architecture and its external spaces is 'poetic' through the architect's handling of: proportions, materials, natural light, framing views, composition, massing, craftsmanship, colours – to the extent that it lifts the spirits of residents, of whatever age.*
- *Introduction of minimum housing space standards to ensure that dwellings meet the lifetime needs of residents;*
- *Adequate provision of public and private open space, including minimum garden size standards, with a preference for larger private garden space to be at the rear of houses, where possible;*

- *Ensure that developments contribute to the sense of place, create the physical conditions for distinctive, connected community life to evolve, and maximise opportunities for the creation of local landmarks and the use of public art;*
- *Providing secure, safe and accessible places to promote community safety and reduce crime and anti-social behaviour, and achieves excellent natural surveillance through regular positioning of active doors and windows overlooking streets and other public spaces, helping to foster [delete: encourage] community engagement and reduce social isolation;*
- *Adequate provision of necessary local neighbourhood facilities, integrated into traditional street network neighbourhoods, as an integral part of the street terracing and to be provided by the developer as an integral part of larger developments;*
- *Designing interconnected, permeable residential schemes to support walking and cycling and providing convenient access to public transport; and*
- *Ensuring that the design and layout is integrated into and interconnected with adjacent uses, and is compatible with them. [delete: and will not create conflict with adjacent land uses].*
- *Ensuring all the neighbourhood centres are freed of commuter traffic from outside the city.*

Council even in its very recent Area Plan for the Line Quarter focusses on mono-functional office use and fails to grasp the dead hand of such single use 'stamps' on urban quality and social vibrancy.

In movement terms the city is at gridlock. Something needs to change. We request the development of a serious city-wide and regional integrated movement strategy with a primary objective of ending car domination.

This policy approach will be applied to extensions and alterations to existing dwellings, and conversions of other buildings to residential use, as well as to all new build residential developments.

7.06 LP 8 – Promotion of health and wellbeing preferred option

Q: How can the LDP best help to improve health, quality of life and wellbeing?

A: see MAG observation below

The critical criteria for achieving *[delete: preferred options for delivering] sustainable neighbourhoods include:*

- Creating the physical conditions for connected people and connected communities eg: residential terraced streets (say 100-120 houses minimum) with direct interconnected access including to mixed-use neighbourhood high street
- A public park and/or wide linear greenway
- Corner shop
- Café and/or pub (the latter not in the residential street)
- Attractive homes to live in, with great light and views
- External spaces that are attractive to use, pass through on foot (to include some private gardens – these need not be large to the front), that add beauty to the surrounding ambience, and touch the senses
- Walkable, integrated neighbourhoods that foster adhoc spontaneous chats with passers by and neighbours
- Low speed traffic
- Well designed bin storage, and regular collection services
- Excellent street cleansing
- Community run car pool with electric and hybrid cars- allowing residents to give up their own car, and reduces on street parking
- Easily accessible electric car recharging points
- Bike lanes
- Homezones and attractive accessible play areas for children
- Allotments and/or community garden
- Adequate community and education facilities within ten minutes walk to include: church, community centre/hall, nurseries, schools, café, corner shop, doctor/dentist, butcher, baker, chemist shop, cultural facilities, public park, shoe repair, hairdresser, post office
- Socially mixed residents
- A culture of quiet streets after 10.00pm

Achieving the above will improve the physical and mental health of communities, generate social activities, and achieve a cohesive community.

Q: ***Should the council seek financial contributions from developers towards the provision of community infrastructure?***

A: Yes.

The American model of developer contribution does exactly that, providing financial input and also facilities and support for neighbourhood/community structures that could include training and employment.

Other provision should take the form of providing public parks, allotments, community gardens. These need to be designed in as an integral part of the development - and not an inaccessible, left over space.

7.07 Community cohesion

The form of the city has been influenced by the spatial legacy of conflict. The impact on the physical layout of the city is most visible in the disconnection of inner-city neighbourhoods from the city centre, and through the legacy of physical separations or peacewalls, which serve to reinforce patterns of division. [Belfast City Council's Planning Authority and its LDP](#) is the possibility of leading the creation of a new and better future for these neighbourhoods. This future is distinctive, [accessible, connected communities of delight](#). ~~that Planning and regeneration processes offer the potential to reconnect the city and encourage the development of a shared urban environment to which everyone has access.~~

LP10 – Community cohesion preferred option

The LDP will include an over-arching strategic policy to encourage all new development to promote community cohesion and make a positive contribution to community relations. This approach could be to address, through supplementary guidance, site specific masterplans or development briefs that ensure proposals are considered in their broader context.

The approach will facilitate development that contributes to a more [cohesive, ~~coherent~~ interconnected urban structure comprising streets and squares ~~form~~](#) by promoting connected developments that facilitate accessibility for all communities. ~~and~~ Policy will encourage permeable mixed-use, mixed-tenure design and [street network](#) layouts to support shared neighbourhoods and facilities. [All public realm spaces: streets, squares, alleys, lanes, parks etc are for use by everyone, anytime.](#)

There are a range of measures across a number of LDP policy areas that can contribute to a more coherent urban form and improved community relations. The establishment of mixed use developments/mixed-tenure housing schemes laid out as on street network footprints of attached buildings sharing party walls; intact, street creating *[delete: strong]* neighbourhood high streets at the core, *[delete: centres]*, temporary uses in interface locations, active street frontages, buildings that provide public services as an integral part of new streets, public paths and cycleways, and open *[delete: passive]* spaces, has potential to enhance community cohesion and to contribute to an opening up the city to inner-city neighbourhoods.

Q: Is there anything else the LDP could do to better promote community cohesion?

MAG observation – see inserts above, and insert the text below.
We support the utilisation of all land within the city.

Imagine a World without Walls.

What we focus on grows – stop focusing on the walls and concentrate on creating an excellent cohesive, physical context on either side of the interfaces, designed to connect through, in time. Make the context either side so good that people want whatever is on the other side badly enough to make the connection.

Initiate a 'Conversations for Change' series – not only old conversations. These are carefully structured as outlined below.

Request: please insert blue text

Of particular importance is the Executive's goal for the removal of all interface barriers by 2023 and the need for the plan to consider the potential for utilisation of all land within the city. The SPPS states that to achieve this target, planning initiatives concerning peace-lines and contested spaces should be considered as part of a more comprehensive regeneration of wider neighbourhood environments. Given that the specific issues associated with each interface or barrier are likely to vary from location to location, it is considered appropriate to address such matters through a series of 'Conversations for Change'. All change happens through conversation – not just any old conversation. These are

conversations with a difference - designed to draw out the strengths of the people and place (past and present) through small group work and careful framing of questions, these build people's capacity to articulate what's already great and working. Over time the conversation progresses to take the strengths (past and present) into the future – and co-create the future together. Assuming that is a good future meeting the needs of all relevant parties, and consistently presented and re-presented to them over time, then people of all kinds live into its possibilities. Unpredictable things happen and people's actions and skills align behind the possibilities created, until, in time, the future becomes reality. Re-connect streets that don't connect at the moment.

Supplementary guidance and site-specific masterplans or development briefs will help support and ensure the creation of a street network context which allows for flexibility in building function and architectural expression [delete: a flexible approach] across the city.

7.08 6.3 Design and Heritage

Good quality design that takes account of the history, built and natural heritage, and unique features of a place is fundamental to good planning. There is evidence to suggest that good high quality places, retaining beautifully repaired, and cared for, built heritage landmarks and collective modest heritage alike eg. such as historic streets, in conjunction with well designed and judged new buildings, spaces and places add considerable value to people's lives by providing them with a distinctive, uplifting environment, unique to them and their world. This special environment is a positive legacy of the best of the past, embodying memory and story, is attractive to visitors (who love visiting places that are distinctive and different from their own), but most important of all it is a great place to live, work, and play for local people. promoting opportunities for walking, cycling and social interaction. It is important that the policy framework continues to require good design in all applications to ensure that the spatial quality of the built environment in the city is improved. [delete: where possible.]

The SPPS seeks to ensure that environmental quality in urban areas is improved and maintained, particularly with adequate provision of green infrastructure, with greater significance being given to the

design and management of the public realm. It acknowledges that the region has a rich and diverse built heritage that contributes to our sense of place and history, represents a key tourism and recreational asset and notes that sustainable management of the built heritage makes a valuable contribution to the environment, economy and society.

The options for Design and Heritage set out in this paper are considered under the following headings:

Conservative repair and sensitive, creative adaptation ·

Urban design;

Architecture

- Arterial routes and gateways;*
- Spatial connectivity;*
- Tall buildings;*
- Heritage;*
- Local distinctiveness; and*
- Energy efficient design.*

7.09 6.3.1 Urban Design

Q: Do you agree with the Council's urban design preferred option? Are there other criteria we should consider?

MAG observation:

This needs adjustment – see insertions below. Additionally we request the creation of a City Architecture, Urban Design and Conservation department with skills in strengths based, possibilities oriented dialogue inquiry and co-creative visioning dialogue as community building/engagement. A macro urban design plan for the city is required. Call a halt to honouring past errors (post 1960 developments primarily). Start again where present contexts include:

- Lock down estates*
- Dead end cul-de-sacs, or*
- Swathes of disconnected suburbia*

7.10 LP11 – Urban design preferred option

Applications will be required to demonstrate how their design supports the creation of an attractive environment in Belfast, and retains existing ones. Development proposals will need to demonstrate they have

regard to **creating and/or retaining excellent relationships** between the **proposed** development and the surrounding context in terms of:

- o **Street** Layout;
- o Higher density;
- o Uses;
- o **Permeability**
- o **Legibility**
- o **Connectivity for pedestrians, cyclists, disabled and vehicles**
- o Scale;
- o Enclosure;
- o Proportion;
- o Massing;
- o Form (roofscape)
Composition (**appearance of façades**) and roofscape);
- o Detailing;
- o Materials;
- o **Colour**
- o Setting and relationship to Heritage Assets;
- o Local Character, **particularly built heritage**;
- o Distinctiveness; and
- o Adaptability in relation to changing social and economic conditions
 - ~~[Delete: security and]~~ **Design passive surveillance into buildings forming streets as active frontages** in order to create safer streets and other open spaces, and minimise the risk of crime; ~~[delete:and]~~
 - The creation of **attractive, usable public spaces (streets, squares and parks and, picturesque urban greenways into the city)**, all of which are ~~[delete: provide]~~ places for **spontaneous adhoc** community interaction through: Inclusive access; Active frontages; High quality public realm; Appropriate soft and hard landscaping; **comfortable** micro-climates; and **minimising the potential for anti-social behaviour**.

7.11 6.3.2 Arterial Routes and gateways

LP12 – Arterial routes and gateways design preferred option

Provide policy which supports quality design vitality and function of arterial routes and key city centre gateways, supplemented by Supplementary Planning Guidance to guide development proposals for the arterial routes of the city and key gateway or arrival corridors.

Q: Do you agree that design quality should be promoted on arterial routes, key gateways and arrival corridors to the city centre?

MAG observation:

Yes. We support the creation of linear greenways at wide arterial routes eg: Cliftonpark Avenue. Where major severance of communities and inner city areas from the city centre exists because of arterial routes and dual carriageways heal, knit together and re-create the intricate city grid remaining in 1963 – pre the Buchanan Report. Cover Westlink with a brilliantly designed urban greenway park – could this be the subject of an international design competition? Note of concern: this is about much more than placing dynamic motorway scale sculptures on round-a-bouts.

LP13 – Promoting greater spatial connectivity preferred option

Q: Do you agree with our proposed approach to promoting greater spatial connectivity?

MAG observation:

Be more ambitious. You have got to make people want to live in the city – it needs to be great. Seville is making 20km of safe cycling routes. Look at what is happening with cycling infrastructure in other UK and European cities, eg: Howard Bernstein's Hipster Bike Rides in Manchester. Be specific too – write into the plan the possibility of footbridge connections, as well as re-creating micro scale street connections. See additional comments in blue below.

The LDP will include an over-arching strategic policy to ensure that all new developments promote greater connectivity between places.

This approach will support the identification of areas of the city that suffer from poor connections between different places and neighbourhoods and [support their remedial design to restore](#) [delete: facilitate greater] full connectivity and integration.

Supplementary Planning Guidance for key gateway corridors would be produced in order to promote a more cohesive approach that recognises the need to establish a sense of arrival into the city centre and build on [existing distinctiveness to ensure strong city neighbourhood identities](#) [delete: and address its distinctive nature].

7.12 6.3.4 Tall Buildings

LP14 – Tall buildings preferred option

Include a policy on taller buildings. This will allow the plan to adopt an approach which identifies sites where taller buildings may be acceptable in certain locations, if they:

- Contribute to a cluster or an interesting skyline when grouped together;
 - Support locations of civic or visual importance (retail centres or major transport interchanges);
 - Provide focus and catalyst to regeneration areas;
 - Form appropriate landmark gateway buildings at arrival points into the city centre;
 - Provide a focus for long distance views;
 - Positively contribute to the legibility of the city and long distance orientation;
- and

Q: Do you support our proposal to include policies to manage the location of tall buildings?

MAG observation:

We support a policy to restrict the creation of tall buildings. With all the unused land in the city we do not see a need for tall buildings. Maintain a human scale. Georgian scale four storey occurs as right, perhaps with taller 'moments' as focal points (eg. church spires, sculptures etc). We do not support the creation of clusters of high-rise towers either for living or commerce.

Q: Do you agree with our approach towards protecting heritage assets?

MAG observation:

We request that your approach be considerably strengthened to make a strong statement of support for built and natural heritage.

7.13 LP15 – Archaeology and built heritage preferred option

The plan will **prepare a local listing of** ~~identify~~ the heritage assets of the city and include additional policy **criteria to support its care, repair and adaptation for new use, where necessary, addressing specific issues and** ~~demand~~ pressures affecting the heritage assets of the plan area as a supplement to the SPPS.

The policy will ~~seek to be responsive to~~ **address and resolve** the specific issues **and threats** which Belfast's heritage assets face now and are likely to face over the lifetime of the plan.

~~Where evidence supports it,~~ **We support the introduction of Article 4 Directions that remove permitted development rights over specific proposals** ~~developments~~ that impact negatively upon **authentic heritage assets (including: removal of original windows, fascias, cast iron gutters/downpipes, dormer cheeks etc and their replacement with uPVC),** These will be introduced to preserve the character and appearance of an area by protecting elements of significance to individual properties and the architectural and historic interest of the **conservation areas and others.** Areas of Townscape Character will be reviewed and monitored including appropriateness of current boundaries.

Q: What specific issues do Belfast's heritage assets face, or are likely to face, over the lifetime of the LDP?

MAG observation:

There are significant threats to Belfast's unique collective heritage. Already the relocation of UU Jordanstown into York Street has seen the loss of unlisted historic buildings. The Royal Exchange proposals represent another significant threat.

We request that BCC Planning Authority utilise its powers to undertake a local listing of all listed and unlisted heritage assets, and that unlisted heritage (pre -1960) be listed. This is a unique and finite, non-renewable resource and major asset for the city. It is arguably the ingredient that gives Belfast its greatest distinctiveness – the element that draws visitors and is a critical ingredient in tourist offer. Research reveals that collective built heritage (and natural heritage settings) may generate an

economic return ten times that generated by visitor numbers to a single heritage landmark.

Every demolition of a historic building in Belfast, large and small, diminishes its distinctiveness and tourist offer.

Q: Do you support the withdrawal of permitted development rights over specific developments to preserve the character and appearance of an area.

A: Yes, see insertions to LP 15 above.

7.14 Local distinctiveness

LP16 – Local distinctiveness preferred option

A policy on local distinctiveness will be introduced through the plan. This would allow the LDP to set out the unique and distinctive features of the city. This would provide guidance for applicants, decision makers and any future neighbourhood plans. It would be based on analysis of the heritage evidence base.

MAG observation:

We support this.

Q: Do you think that locally distinctive features of the city, that help reinforce a sense of place, should be promoted and safeguarded?

A: Yes – see comments on unique built heritage in the answers to LP 15 questions. We add that the possibility exists for BCC planning authority to lead on bringing about a cultural shift that sees the city's modest collective heritage valued, retained, and cared for, every bit as much as its landmarks. There is also enormous scope for innovative, creative, well judged new development, that is sensitive to existing heritage contexts, to add to existing distinctiveness, reinforcing local identity, character and, potentially, contributing to the heritage of the future. For this to occur excellent design quality is required.

7.15 Energy efficient design

LP17 – Energy efficient design preferred option

The policy will promote an approach which facilitates high standards of energy efficiency in design requiring a minimum BREEAM rating for new build non-residential buildings[delete: unless it is demonstrated not to be viable]. Historic buildings present greater challenges in this regard but there is still scope to reduce heat loss. Encourage greater energy efficiency in proposals involving historic buildings, where this does not impact negatively on character and/or cause removal of authentic fabric inside and out, and the breathability of traditional construction. Refer to research by SPAB demonstrating the relative energy efficiencies of solid wall construction versus modern insulated cavities etc.

Q: Do you think that minimum standards should be put in place in relation to energy efficiencies in all new non-residential buildings?

A: Yes.

Q: Should energy efficient design requirements also apply to new residential buildings?

A: Yes.

All residential buildings should aim to be carbon neutral in use, or have a designated pathway to future carbon neutrality designed in, through simple retrofit measures.

All refurbishment should be to carbon neutral standards. Specialist advice from accredited conservation architects and building surveyors is needed to ensure the attainment of this is achieved without loss of historic surfaces (walls, ceilings and floors), or compromising the essential breathability in solid wall construction.

7.16 Planning Policy Statement 6: Planning, archaeology and the built heritage

We do not support any weakening of policy pertaining to partial (or full) demolition in a conservation area. In reality the context and culture around this is already weak in interpretation. Unlisted heritage buildings in conservation areas should attract the same level of protection as listed buildings as per PPS6. Each case is always considered on its own merit.

7.17 Planning Policy Statement 7: Quality residential environments

MAG observation:

We welcome the encouraging comments in recent months from Roads Service /Infrastructure NI to reduce the requirement for car parking spaces in inner city areas. This is a welcome change from the 'Creating Places' policy which required two spaces per dwelling. There is a serious need to reduce our reliance on private car travel. The possibility of creating car free residential offer (supported by community car pooling and/or low car hire services - offering electric or hybrid cars occur. We request open cross-disciplinary conversations that are design-led and not engineering-led or technocratic.

7.18 Planning policy Statement 12: Housing in settlements

We are concerned that the earlier Plan assertions that will endeavour to build in the city if 'appropriate lands' are available is a 'get-out' card for building in settlements at some time. The city has a wealth of unused land - we do not see the need to build in smaller settlements. We request that this situation be reviewed at 3 or 5 year increments - and that this review be subject to public consultation.

7.19 Planning Policy Statement 17: control of outdoor advertisements

Q: Do you consider the preferred option for employment growth to be a realistic ambition for Belfast?

A: No

MAG observation:

We support realistic sustainable employment growth, particularly of the local economy, and have concerns about the rationale for the projected 46,000 jobs increase. This figure is the same as the projected increase in population – is this a coincidence?

Belfast is relatively disconnected to Europe and other parts of the UK, particularly by air- many destinations still require a connecting flight through London. As previously stated Brexit is closing the door on incomers from EU countries. EU nationals already resident in Belfast, and elsewhere in NI and the rest of the UK, are very uncertain as to whether they will be allowed to stay on after Brexit. Some are already leaving.

We've already seriously questioned the possibility of 46,000 additional people. Even if this were to occur not all of these people are of employment age.

Projecting 46,000 jobs increase seems very overblown.

Job growth to this extent is over ambitious as far as in-migration from abroad is concerned and, potentially damaging to the socio-economic viability of other settlements in Northern Ireland. We request a steady state projection, perhaps with a small percentage increase.

8.00 Chapter 7 – Creating a vibrant economy

8.01 VE1 - Employment land supply preferred option

The LDP will seek to identify and maintain a flexible and varied supply of business accommodation and employment land that is of the right type and in the right locations. This should be based on the ambitious level of economic growth – projecting the creation of c. 46,000 additional jobs over the plan period – to help Belfast compete with other cities across the UK. Sufficient land will be identified to ensure between 486,400-608,000 sq m – we strongly query these figures highlighted in red of floorspace can be supplied for B-Class employment uses to 2035, or 25,600-32,000 sq m on average per year. However, the approach to land supply will be flexible, based on the qualitative nature of supply, including its distribution across different growth sectors of the economy and different markets areas of the city.

We request a sequential approach to prioritising property assets for additional employment floor space to reduce new build requirements and reduce uptake of agricultural. Identify and prioritise existing properties across the city, in the following order:

1. Re-use of existing vacant buildings (particularly built heritage).
2. Unused, underused land
3. Backlands, including currently disconnected
4. Brownfield land

These should all be within the city's development boundaries.

8.02 Strategic Employment Locations

VE2 - Strategic employment locations preferred option

Our Preferred Option is to review strategic employment sites as set out in BMAP and identify new smaller opportunity sites to ensure projected employment needs are accommodated across the plan period.

MAG observation:

We support the review of strategic employment sites, and the creation of employment possibilities across the city, particularly in neighbourhoods.

Q: Where do you think employment growth should be focussed in the city?

MAG observation:

We support the LDP proposal to identify previously developed land within settlements for potential economic development use, and request that property and land identified for employment uses be 'knitted in' to walkable neighbourhoods across the city, integrated with other uses, rather than creating large mono-use developments remote and disconnected from the workers and their neighbourhoods. The latter drive up the number of car journeys.

8.03 Protection of existing employment locations

Q: Should existing employment locations be protected against other competing uses?

A: No – see additional comments below

8.04 VE3 - Existing employment land preferred option

Our Preferred Option will protect areas of existing employment against other competing uses to facilitate opportunities for economic regeneration and employment growth. Where sites become available due to closure or relocation, there will be a presumption in favour of retaining the employment focus, which may include a range of B use class and sui generis uses that help drive future employment growth.

However, a flexible approach is required to allow for alternative uses on employment land where such sites are not capable of accommodating similar employment uses, to ensure on-going beneficial use of land and to maximise potential. The release of sites will depend on an adequate supply of employment land being retained and any alternative uses remaining compatible with neighbouring existing employment uses.

MAG observation:

We do not support the protection of existing areas of employment against other competing uses – if the competing use brings other regeneration potential or community benefits these uses should not be excluded to protect a longer-term objective that may never come to this site/property.

We request that the plan make it possible for sites currently designated for employment to have other uses including residential to create many more mixed-use developments and neighbourhoods with employment uses. The 19th century approach which located large linen mills (often with one or more facades forming neighbourhood street frontage on one or more facades, and cheek by jowl with workers terraced housing is a very relevant and apt precedent. Conway Mill occurs.

8.05 Supporting higher education

Q: Do you agree that we should generally be supportive of higher education institutions?

MAG observation:

Yes, in general. Sustaining vibrancy, vitality and the feelings of safety that flow from these is much more achievable when third level educational uses are integrated into a wider mix of uses including (student and non student residential uses). Mono-cultural third level education campuses tend to be relatively dead during vacations, in the evenings, and weekends.

8.06 VE4 – Supporting development needs of higher education institutions preferred options

MAG observation:

We support this preferred option. The creation of all new third level education facilities should be thoroughly interconnected for pedestrians, cyclists and disabled within their developments and between them and surrounding urban neighbourhoods/quarters.

8.07 Retail

MAG observation:

We support the bulk of the following statement, subject to blue text being inserted.

Communities and people are the lifeblood of our city, and we must create neighbourhoods that make a real difference to people's lives, and are transformational at a citywide and local level. Well planned, designed and sustainable neighbourhoods, with high quality, attractive local services will create places where people will want to live to bring up their families and meet their friends. The RDS recognises the importance of accessible, vibrant city and town centres that offer people more local choice for shopping, social activity and recreation, and are great places to live as well. Local neighbourhoods and their high streets [delete: centres] can provide diverse places where people want to live, visit, work and shop locally.

Q: Do you agree with our proposed network and hierarchy of centres?

VE5 – Network and hierarchy of centres preferred option

The plan will define the network and hierarchy of centres as the best framework for directing future development based on that currently defined within BMAP as stated below:

- *Belfast city centre;*
- *District centres;*
- *Local centres; and*
- *Arterial routes or commercial nodes.*

MAG observation:

Apart from the obvious hierarchical category of Belfast city centre, the language of district centres and local centres, and commercial nodes has very little meaning to those outside the world of town planning. We

request that more traditional language be used to describe these reflect more traditional language:

1. Belfast city centre
2. Arterial high streets
3. Neighbourhood high streets

An arterial route is not a centre. Some have the character of a high street (eg. Lisburn Road, Lower Newtownards Road). Others are four lane roadway with little 'centre' or 'high street' about them (eg. Carrick Hill). Commercial nodes tend to be mono-use and run counter to our strong support for mixed-use development. We do not support these as a centre typology.

We request a hierarchy of places as described in 1-3 above.

8.08 VE6 – Centre boundaries preferred option

Define centre boundaries for all arterial high street, [delete: district], and neighbourhood high streets [delete: local and commercial nodes on arterial routes] as identified in the proposed retail hierarchy and illustrated on the map to provide a focus for effectively managing development and investment that will maintain compact centres and ensure a balance of retail, services, residential, and community facilities.

We register strong concern and foreboding that Belfast does still seem to wish to continue with a 'retail-led' regeneration agenda - Royal Exchange (now re-named) continues with that agenda at the expense of mixed-use and at cost of loss of public streets to a private 'management company'.

Q: Do you agree that centre boundaries should be redefined?

MAG observation:

The city centre has for many years been developed at expense of the neighbourhoods and inner city communities in a narrow focus of 'either-or', either the centre or the neighbourhoods. We seem to have been unable to plan and deliver 'both-and'.

Additionally citizens in inner city communities feel excluded from talk about regeneration when they see and experience no such regeneration in their areas. The delay in the final publication of

the City Investment Strategy and Delivery Plan (the Berridge Report) was because of angry reaction by many citizens that they were excluded from the City's plans. The process of re-defining centre boundaries is, perhaps, a process of negotiation and requires citizens to be up-skilled to help effectively partner with Council and others. Examples of sites such as Sirocco and Hope Street could be models to test such working methodologies.

It is important that the city centre does not have too abrupt an edge, but blurs into inner-city communities. The westlink, the river and other transport infrastructure have separated poorer communities from the city - this needs to be reversed to allow economic connection between the city and the neighbourhoods that are adjacent.

Request: initiate a capacity building programme for citizens to support them in partnering and co-creating with Council and others a better physical relationship between their neighbourhoods and the city centre.

Q: *Are there specific shopping retail or commercial areas that should be identified as local or neighbourhood centres?*

A: No

MAG observation:

Care needs to be taken not to place development typologies such as shopping centres into the same category as a traditional high street or neighbourhood. They are simply one of many development typologies. We would not so designate a major educational establishment as a 'centre' so why a retail centre or commercial business park?

A neighbourhood or local centre occurs as a place where concentrations of people live, work, shop, visit, and perhaps also go to school/college? These may have formed originally as an earlier town centre or village and are, now, subsumed into the city as a whole. Such 'centre' have character, distinctiveness and are the face of neighbourhoods that locals identify with.

Q: Do you agree that the proportion of non-retail uses should be managed within existing centres?

MAG observation:

In support of creating mixed-use walkable neighbourhoods we request that non-retail (and local economy retail) uses be allowed to spread out of existing centres into identified neighbourhood high streets, within the overall city boundary.

8.09 Ensuring the vitality and viability of centres

VE7 – Ensuring the vitality and viability of centres preferred option

Within the defined arterial high streets, and neighbourhood high street centres a proportion of units will be maintained as Class A1 shops and change of use to other A Class uses and non-retail uses will be permitted to support the creation of mixed use walkable neighbourhoods [delete: managed]. This will foster a good mix of uses supporting street vibrancy and vitality [delete: prevent an over-concentration of non-retail uses] and provide a diverse mix of uses appropriate to meet local shopping demand that is highly accessible.

8.10 **City centre**

Q: Should the city centre boundary be redefined (from that set out under the BMAP 2015?)

VE8 – Defining the city centre preferred option

Review and define the boundary to reflect the existing use, scale and built form and to accommodate the projected development needed over the plan period to 2035.

MAG observation:

There is so much unused land in the present city centre that until this has been fully utilised with high density mixed use development the present city centre area is sufficient. As previously noted the boundary needs to become more blurred with surrounding areas to foster better engagement by the city centre with its surrounding neighbourhoods. The size of the city centre seems reasonable. That said the Plan needs to rejoin neighbourhoods to the North, East and West with the city as a

priority. The South is better connected and flourishing because of it.

The use of diagrams might have helped this section to clarify intentions and to allow challenge to early identification of the 'areas that might be excluded from the centre'. A wider focus on a much longer plan period (fifty years) is also required. What if Belfast did have population of 500,000 by then through natural population growth - what of the centre boundary then?

8.11 VE9 – City centre primary retail area preferred option

Review the primary shopping area and the type of uses and define the boundary necessary to accommodate future growth.

MAG observation:

The city must not develop any more privately owned shopping. It is essential that existing streets are re-energised and that land parcels are not assembled that delete rights of way. (e.g. No Liverpool One type developments). The recent iteration of the Royal Exchange proposal is a worry and concern. The privatisation of public streets, the removal of historic fabric just to connect 3 shopping centres (Castlecourt /John Lewis / Victoria Square) and to connect in a way that prevents 'pedestrian leakage' - not much permeability there - and ensures that shoppers are exposed to retail frontage as they walk from front door to front door may encourage happy shoppers but does nothing to promote happy citizens.

Q: What issues should be taken into consideration when re-defining the primary shopping area within the city centre?

MAG observation:

The extent of ground floor retail vacancy reveals the changing patterns of retailing nationally. City Centre retailing has been eroded by out of town centres (Sprucefield and Junction 1) and internet shopping. The future of city centre retailing is likely to be centred on those items people cannot or choose not to buy on the internet:

- Large bulky items like furniture, or household appliances that shoppers want to try out, sit on, lie on, open the door etc – beds,

sofas, ovens, fridges (today London's Tottenham Court Road is full of furniture shops)

- Food and drink - especially specialist, artisan, organic etc etc

In this very fluid context the floor space previously given over to retail uses may not all be needed. We request that consideration be given to broadening the range of uses within the primary retail area to permit the conversion of vacant retail units to unconventional residential uses. This maintains vitality when shops are closed and is likely to help support a transition to more bespoke hospitality enterprises.

8.12 VE10 –Leisure and tourism in the city centre preferred option

The plan will provide a policy framework that prioritises and supports the retention and careful re-use and adaptation of built and natural heritage as a key element contributing to Belfast's distinctive tourist offer; and guide development and support opportunities for tourism projects and hotels in recognition of the role of the city centre as the regional economic driver.

MAG observation:

If BCCRIS is serious about making Belfast a world class tourist destination it will need to achieve a cultural transformation in its attitude to built heritage, particularly in communicating to developers that they are very welcome to develop in the city - but on Belfast's terms. The potential loss of heritage to schemes such as the proposed Royal Exchange is very alarming. There appears to be a need for significant joined up thinking between the BCCRIS, BCC Planning Authority and the BCC Regeneration team.

Approach

The Council's broad objective is to make Belfast a World Class Visitor Destination. The BCCRIS recognises that the city's culture, built and natural heritage, and history play a key role in attracting more people to come to the city centre bringing significant economic benefits and the Belfast Integrated Tourism Strategy seeks to double the value of tourism to the city by 2020.

Visitors choose places that are different from their own as places to visit. Research shows many choose to spend their time in the most

historic areas of cities and towns during their visit. Research also shows that visitors to heritage stay twice as long and spend twice as much. Visitors to collective, authentic heritage environments may generate as much as ten times the economic return as visitors to a single heritage landmark building. Belfast prioritises the retention, care of, repair and sensitive re-use and adaptation of its built heritage as a key unique and distinctive element in its tourism offer.

The tourist plan policy will prioritise and support the utilisation of built heritage for tourist accommodation or supporting hospitality services and encourage standards evidenced by The Merchant Hotel and the National Grande Café.

Adopting a flexible approach to development by allocating sites for a range of development, the plan could support signature tourist destinations, hotel development, leisure and public realm attracting more people into the city centre bringing economic benefits. The plan could provide for better integration of places to live, work and leisure activity. By identifying sites, this provides clarity and certainty for investment. By adopting the city centre first approach as advocated by the SPPS, the plan can reinforce the city centre as the hub of cultural, entertainment, tourism and leisure facilities. There may be facilities that provide for cultural and leisure activities, or which are an attraction to tourists, which may be more appropriately located outside of the city centre. These will be considered through criteria within the policy.

Q: Do you agree that a policy framework should be provided to guide leisure and tourism development in the city centre?

A: Yes

MAG observation:
see qualifying comments above

8.13 City centre living

VE11 – City centre living preferred option

MAG observation:
We support this.

Q: Do you consider the proposal to facilitate and promote city centre living as a viable and realistic option?

MAG observation:
We support this.

Q: Would you consider living in the city centre?

A: Yes.

Q: How could we best encourage people to live in the city centre?

A: Ensure that the many and varied residential amenities necessary for a city centre to be a great place to live are supported by the plan. These include a compatible mixes of uses offering range of functions necessary to support city centre living eg:

- good schools (primary, second and third level), nurseries
- library
- laundrette
- cafes
- coffee shops
- bakeries, butcher, grocers, greengrocers
- book shops
- bistros, wine bars, restaurants
- community services
- cultural facilities
- local economy retail independents
- easy pedestrian access to green and blue spaces (particularly the River Lagan)

Create very specific mixed –use zoning categories naming the detail of uses above

Other necessary ingredients include:

- Night-time quiet (discourage pubs and clubs)
- Clean air
- Some residents parking
- Car pooling (electric/hybrid low rental costs)
- Easily accessible electric car charge points
- Bike parking
- Communal meeting facilities within apartment buildings
- Accessible, usable green spaces/parks/community gardens/allotments/roof gardens/terraces etc
- Accessible bin storage

- Good bin collection
- High quality street cleansing

We agree that vacant ground and upper floor city centre spaces in existing buildings should be encouraged into residential use, particularly built heritage (of all ages up to say 1960). We support Living Over the Shop, and after vacant heritage spaces have been brought back into residential (or converted to residential use), then target the use of underused/unused backlands, followed by brownfield sites

8.14 VE12 – Shared space in the city centre preferred option

The plan will promote the principles of a shared society through guidance and a spatial approach that is built on improving connectivity, delivering balanced development and supporting regeneration.

MAG observation:

We support this.

Q: How inclusive do you think the city centre is?

MAG observation:

There is still a sense, in the city, of particular 'doors' or access points for particular neighbourhoods or affinities. That said, the city is increasingly more inclusive though Cathedral Quarter does need to expand its girth to include Dunbar Link and stretch over to Corporation Square and across to Titanic Quarter. Specific Urban Connection Projects, not plans, could help encourage belief in the 'One City' agenda. The idea of zipping over the Westlink or building over the open void of the motorway at key junctions with the arterial roads is actually a making of new ground. Such a concept is rich metaphor and offers a potential physical reality that steps aside from notions of 'shared space' to affirm positive change. Intentions for city centre housing waiting lists that are 50% /50% is potentially helpful but should be accompanied by suggestions to realise such provision. The increasing nightlife in the city is to be commended. The city needs to become a 24 hour attraction. The current licencing laws prevent this and reduce tourism because of the weekend licencing.

Q: How could the LDP help to make it more inclusive?

MAG observation:

Make it a policy requirement that all new regeneration schemes build in socially mixed and mixed land use proposals. Require re-connecting existing and remaking former streets where these have been disconnected and/or erased. Simply removing interfaces will not, alone, turn the city into a fully inclusive place. It occurs that substantial work is needed to build and re-build relationships and trust.

We request that relational and community building 'Conversations for Change' series be convened. These would invite, engage, and build new relationships between people from all cultural backgrounds in the city. Such conversations would include carefully framed questions designed to create conditions for forgiveness, whereby inter-personal and inter-community healing, might be realised.

Skills required to create and deliver such a series of conversations for change include:

- transformational leadership
- strengths based, possibilities oriented inquiry dialogue methodologies

8.15 VE13-City centre development opportunities preferred option

The plan will provide a policy framework to guide development and regeneration opportunities in recognition of the city centre role as the regional economic driver.

MAG observation:

We support this.

Q: Do you agree that policy frameworks are required to guide development and regeneration within the city centre?

A: Yes – these should include urban design led frameworks setting out overall place-making parameters (density, massing, scale, heights, mix of uses, permeability, legibility, streets/squares, parks, gardens, palette of materials/colours etc) and encourage the re-making the pre 1963 street pattern where this has been erased.

9.00 Chapter 8 – A smart connected and resilient place

9.01 How will we grow Belfast?

A smart connected and resilient place

9.02 Transportation

Q: Do you frequently walk or cycle to and from work?

A: Yes.

Q: Would you walk or cycle more if there were improved networks and connections in place?

A: Yes.

9.03 SCR4 – Walking, cycling and sustainable modes of transport preferred option

The plan should support walking and cycling as sustainable modes of transport by the provision of facilities and safeguarding existing and proposed cycle and walkway routes to encourage active travel. The plan will support design guidance that encourages pedestrian movement and establishment of safe and attractive pedestrian routes.

MAG observation:
Yes, we support this.

9.04 Public transport network

SCR5 – Public transport network preferred option

The plan should protect the land required to facilitate new public transport schemes or planned improvements to the existing network – both bus lanes and rail expansion. The plan should encourage higher density developments and promote regeneration opportunities linked to new and existing public transport networks.

MAG observation:
Yes, we support this with amendments in blue at SCR5 above. Networks such as the Belfast Rapid Transit system should intensify and increase mixed use building density around each of the proposed halts or stops?

Q: Does our approach to transportation achieve an appropriate balance between all forms of transport?

A: No

MAG observation:

The plan is silent on policy to get people out of their cars, especially commuters. If the city is to get serious on climate change and significantly lessen the current (and growing) strain being experienced by the road network is to be substantially lessened, and a pedestrian and cycling friendly city created, then a serious commitment by BCC Planning Authority and this LDP is needed to prise us all out of our cars – or even better give them up permanently.

Options to help achieve this include:

- Car toll charges
- Reductions in numbers of carriageways – give these over to bike lanes
- Increased numbers of bike docking stations
- Community car hire (low rental) using electric/hybrids

9.05 SCR6 – Highway network preferred option

The plan should protect land required for new road or road improvement schemes as identified as essential by the DfI and provide design guidance to ensure wider benefits to the surrounding areas through improved connectivity and regeneration benefits.

MAG observation:

No – we do not support this.

This preferred option is simply maintaining the status quo, or worsening it. See comments above on the need to get serious about introducing new policy and measures to significantly reduce private car transportation. In a city that is projected to grow, additional cars and roads is not the way forward. Lessons from cities like Bristol demonstrate that the optimum public transport system won't exist before constraints are placed on the car drivers. It works the other way round. By restricting private car travel into the city, the demand for public transport rises.

Q: How can we best capture regeneration benefits arising from development in the strategic road network?

MAG observation:

1. Reduce private car usage
2. Retain lands that might otherwise have been earmarked for new roads for high density mixed-use neighbourhoods around public transport hubs
3. Downgrade existing wide four lane carriageways roads – 4 lanes becomes 2 for cars and 2 for bikes
4. Implement shared movement schemes, wherever possible, to slow traffic speed, create safer environments for pedestrians, and overcome community and pedestrian severance eg.
 - Exhibition Road, London
 - Seven Dials, Covent Garden, London
 - Bohmte, Germany

9.06 Parking Demand Management

SCR7 – Parking demand management preferred option

The plan will consider revised local parking standards to include guidelines to allow a flexible approach to be applied and to encourage the use of more sustainable modes of transport.

The plan will ensure [delete: adequate] minimal provision for parking in new developments, in support of maximising usage of public transport, including provision for disabled and family friendly spaces.

The Plan will include provision for designating areas of parking restraint and managing the provision of long term parking spaces.

Q: Do you agree with our proposed approach to parking demand management?

A: Yes, we agree, subject to the suggested changes given above.

9.07 Environmental quality

Q: Do you agree with the approach to improve the environmental quality of the city set out below?

SRC8 – Environmental quality preferred option

The Preferred Option is to enhance Environmental Quality where possible, and protect communities from materially harmful development. The LDP will consider the issues of environmental quality related to ground contamination, air, noise and light pollution to ensure

the amenity for the end users is protected. To provide supplementary guidance for Developers outlining the information required as part of their development proposal for remediating contaminated sites.

A: Yes, we agree.

Q: ***Should we provide supplementary guidance on the information required with a planning application in relation to site investigation and remediation proposals?***

A: Yes.

Q: ***Will this help avoid delays in the planning process?***

MAG observation:

To help reduce delays in the planning process we request the introduction of early pre-application meetings (not necessarily the formal Pre-Application Discussion (PAD) but one which could be a paid-for service at which designers and their clients could discuss early concepts and ambitions and discuss the fullest requirements for subsequent applications. This would be very effective if our earlier request for a City Architecture, Conservation and Urban Design team were in place and leading these pre-application meetings.

Additionally planning applications for major sites or projects of major importance should require physical models / 2D and 3D contextual drawings and visualisations etc. It is not reasonable or acceptable that major applications that impact near-neighbours are only required to submit the basic plan, section, elevation drawings.

9.08 *Building Environmental Resilience*

Q: ***How can Belfast build on its status as a global 'resilient city' to respond to environmental change?***

MAG observation:

1. Get people out of cars
2. Support existing and create new mixed-use walkable neighbourhoods
3. Create an environment supporting public transport use, walking, running, and cycling

4. Support people growing their own food close to where they live – allotments and community gardens
5. Introduce a policy of zero waste
6. Support renewable energies, including tidal power
7. Reduce carbon emissions citywide by 30% before 2030
8. Stop building in flood plains
9. Design to cope with flooding in ways that avoid mass concrete solid walls at ground floor level along street frontages

Q: Do you agree we should encourage the reduction of green house gas emissions to improve air quality?

A: Yes.

MAG observation :

Yes but SRC9 needs to go much further than this. The use of fossil fuels for heating homes and buildings, and fuelling private cars are two of the greatest contributors to carbon emissions. Both need to dramatically reduce if Belfast is going to make any difference on this matter.

9.09 Renewable energy preferred option.

We support SCR 10 –

Q: Would you support policies for community energy generation schemes?

A: Yes definitely, especially ones linked to renewable energy, or co-generation.

Q: To what extent do you agree that we should promote the delivery of a planned and integrated renewable energy generation supply?

MAG observation:

Totally. The city needs to set ambitious targets for renewable energy production, aiming to be fossil free at the end of the period (2035). This is one of the city's biggest challenges. An end to fuel poverty on its own would regenerate the city.

9.10 SRC11 – Adapting to environmental change preferred option

The Preferred Option is that the LDP Policies will positively [delete: seek to] facilitate the incorporation of adaptation measures to adapt to environmental changes, which will support a resilient city that protects communities, biodiversity, the built and natural environment.

MAG observation:

We support this with the above amendment.

Q: To what extent do you agree that we should promote the delivery of a planned and integrated renewable energy generation supply? Would you support policies for community energy generation schemes?

MAG observation:

All social housing should incorporate district renewable energy schemes.

9.11 Approach

The city is already experiencing extreme weather events, which has had an impact on the communities in Belfast. To leave the city vulnerable without adapting to the future changes will be a high-risk strategy, and financially very expensive in the long term. The LDP should address adaptation to environmental change to fulfil sustainability commitments, and to build a resilient city. As this is a multi-faceted topic, the best way to tackle adaptation to environmental change is to ensure it is covered thoroughly throughout the LDP.

Q: Do you support measures to adapt to environmental change that will help to build a resilient city?

A: Yes.

9.12 Flood risk management

SRC12 – Flood risk preferred option

The Preferred Option is to review the scope of existing policy to focus on the management of potential flood risk in the urban area. This will consider the potential for supplementary guidance on how to incorporate flood mitigation measures, such as Sustainable Urban Drainage Systems (SUDs) appropriate for the urban environment.

MAG observation:

Yes, we support this. But it could go much further. The conditions and capacity of the city's waste and storm drains require appraisal and renewal.

Q: Do you support the range of measures proposed to manage potential flood risk within the plan area, such as green and blue infrastructure and the development of Sustainable Urban Drainage Systems (SUDs)?

A: Yes, we support this. But it could go much further. The conditions and capacity of the city's waste and storm drains require appraisal and renewal

Q: Should we also require a drainage assessment to be provided for all new residential developments within potential flood risk areas?

MAG observation:

The conditions and capacity of the entire city's waste and storm drains require appraisal and renewal.

Sea level rise and storm surge needs to be adapted to immediately. By the end of the century a managed retreat from some coastal areas might be necessary. Plans need to be developed taking into regard up to a 2m rise by the end of the century.

9.13 SCR13 – Waste infrastructure preferred option

The LDP should facilitate the development of new infrastructure in appropriate locations or an upgrade of existing facilities to increase resource efficiency and enable a shift towards a circular economy as well as have regard to the proximity principle.

The plan will ensure that appropriate provision is made for the storage of waste recycling containers in all new development schemes to maintain a high quality environment.

Q: Do you agree with our approach to sustainable waste management throughout the city?

MAG observation:

This appears to be maintaining the status quo. The plan needs to go much further on this and write in a commitment to support a zero waste culture, through separating out waste at source, recycling, re-using and reducing.

9.14 *Planning Policy Statement 3 (Revised): Access, movement and parking*

We request that this policy allow for the creation of shared movement in the following:

- 'Neighbourhood High Street' core areas
- 'Arterial high street' centres:
eg. as achieved at Exhibition Road and Seven Dials London, and at Bohmte, Germany.

9.15 Parking

Support small areas of integrated on-street parking for cars (side ways and not end on parking)

Support the creation of communal bike docks

Discourage large areas of surface car parking anywhere in the city

Where multi-storey car parking is being created support its location in backlands. Where such a development is creating public street frontage, require that active mixed-uses be created at ground floor level.

9.16 Planning Policy Statement (PPS) 10: Telecommunications Planning Policy Statement 11: Waste

See our comments above on Sustainable Waste Management – we request that this policy include a requirement to achieve zero waste at municipal and household level.

9.17 Planning Policy Statement 13: Transportation and land use

We request that this policy include requirements to:

- Prioritise the pedestrian, and 'green transportation' transport modes: rail, bus, cycling and walking.
- Support the creation of 'shared movement' eg Exhibition Road, Seven Dials, London + Bohmte, Germany
- Support the creation of an urban park above Westlink – eg. Millennium Park, Chicago

- Support the creation of pedestrian footbridges across the Lagan and at the docks area, particularly where these improve pedestrian connectivity between north and east Belfast and the city centre.
- Land-uses to be integrated and mixed-use.
- Support mixed-use development within buildings – vertically and horizontally – as well as across regeneration sites.
- Require mixed tenure residential (to include social and affordable housing) in new city centre and neighbourhood regeneration schemes.

9.18 Planning Policy Statement 15: Planning and flood risk

Serious engagement with sea level rise needs to be included in the plan. Rises as high as 2m are predicted by the end of the century, and much of Belfast city centre is at sea level and in danger of inundation.

9.19 Planning Policy Statement 18: Renewable energy

The council needs to have a policy that actively encourages the retrofit of renewable technologies in the city.

10.00 Chapter 9 – A green and active place

10.01 GA1 – Open space, sport and outdoor recreation preferred option

The Preferred Option is to continue the existing policy approach to the provision and protection of open space including community greenways, natural heritage areas, the Regional Park, Belfast Hills, green wedges, and linear green communal spaces, to support an integrated approach to green and blue infrastructure networks. The plan will also review and update policy in respect of the scale of proposal for which the provision of new communal space is a requirement.

MAG observation:

re: Open Space, Sport and Outdoor Recreation map

We do not support the continuation of present policy as written in GA1. Whilst welcoming the identification of community greenways and an intention to identify land for open space (green or otherwise), there does not appear to be much, if any, such land earmarked on the above former BMAP map. Perhaps the colour differentiation in the two

shades of green is not markedly different enough?

The intentions in the BMAP map - vis-a-vis proposed designations for open and green space - are very unclear, particularly as they apply to the city centre. In a plan that seeks to increase the city's population, and make the city centre attractive for living, the number and quality of green and open spaces will need to increase significantly - especially in the city centre. In this, and other parts of the city, vacant sites offer possibilities for creating new pocket parks, city squares (of hard or soft landscaping) and full-blown parks. Some (though by no means all) of the 87 Hectares of unused space identified, in and around the interfaces, needs to be reprogrammed as active green space - preferably inter-connected to provide safe routes for cycling/walking to the city.

We request that BMAP's Open Space, Sport and Outdoor Recreation map is thoroughly reviewed and revised to make it much more relevant, pro-active, and progressive in its intentions.

Q: *Do you think there are enough open spaces, parks, sporting opportunities and areas for recreation, walking, cycling in Belfast?*

A: No.

Q: *How can provision be improved?*

A: Vacant sites and demolition of architecturally low-grade properties reaching the end of their construction life offer possibilities for creating:

- new pocket parks
- city squares (of hard or soft landscaping) and/or
- full blown urban parks

Other opportunities to create attractive, beautifully landscaped linear greenways occur at existing 4+ lane road carriageways.

Downgrade these to:

- 2 lanes for cars
- Narrow other lanes as dedicated bike lanes
- Widen and re-landscape pavements for pedestrians

10.02 GA2 Provision of New Open Space and Green Corridors Preferred Option

The Preferred Option is to provide guidance on where contributions may be appropriate to support the green and blue infrastructure networks located in proximity to the new residential development.

Q: Should the LDP contain proposals for the development of an increased provision (of high quality design) integrated green and blue infrastructure network of green spaces and water features, providing access to amenities for recreation, walking, cycling and wildlife?

A: Yes with text in blue inserted above. This needs to be done in an integrated way that makes provision for dedicated bus and bike lanes.

Q: Should the Council seek financial contributions from developers towards green and blue infrastructure?

A: MAG observation:
Yes, with text in blue inserted above.

Q: Do you know of any open spaces, local routes or rights of ways that could be used to form part of an integrated green infrastructure network to provide for wildlife, recreation, walking and cycling?

MAG observation:
The following occur as offering possibilities:
Arterial Routes

- Clifton Park Avenue
- Cliftonville Road / Oldpark Avenue
- Antrim Road
- Crumlin Road
- Ballysillan Road
- Falls Road
- Andersonstown Road
- Shankill
- Lisburn Road
- Malone Road
- Newtownards Road
- Ormeau Road
- Ravenhill Road

- Beersbridge Road
- Woodstock Road
- Albertbridge Road / Cregagh Road
- Ladas Drive
- Cavehill Road
- Shore Road

Open spaces offering possibilities for open and green spaces occur as including:

- Sirocco
- York Street

It is important that the design of these spaces help to blur the boundaries between and achieve seamless connectivity for pedestrians between the rich commerciality of the city centre and the poorer neighbourhoods.

10.03 GA3– Natural heritage preferred option

The Preferred Option is to review existing policy regarding local sites of nature conservation importance and consider the potential for the preparation of management plans and local design guides for designated areas such as AONB and Special Countryside Areas. The Local Development Plan will adopt a strategic approach to opportunities for green and blue infrastructure networks to help support biodiversity. It will establish policies to recognise the value of community greenways, natural heritage areas, open spaces, green wedges, and linear, green open spaces, as part of integrated green and blue infrastructure networks.

Q: Do you support our proposed approach to protecting the natural heritage of Belfast?

A: Yes

We request confirmation that the Belfast hills: Cavehill, Divis + Black Mountain, also Craigantlet Hills are designated as natural heritage areas and/or AONB/Special Countryside Areas

Q: Do you agree with the preparation of management plans and local design guides for designated important landscape and natural heritage areas?

A: Yes.

10.04 GA4 - Trees preferred option

The Preferred Option is that the LDP will [delete: seeks to] protect existing trees and implement a major Greening the City programme of tree planting across the city [delete: encourage further provision] to offset unavoidable carbon emissions, reduce air pollution, provide shade and mitigate flood risks. This will be achieved by:
[delete: Adopting a precautionary approach to the net loss of trees];
Protecting trees from harm caused by development by applying Tree Preservation Orders to protect existing mature broadleaf deciduous trees within private and public property; and
Requiring development proposals to [consider the potential to] plant new or replacement trees through either on or off-site provision.
Ensuring that new development is sited to avoid foundations encroaching on tree root systems. In instances where this is not possible make it a condition of planning approval that foundations are designed in such a way as to avoid cutting through tree root systems – eg. judicious use of piling

MAG observation:

We support this in principle but it needs to be substantially strengthened- see blue text inserts above.

Q: Do you support the protection of valuable and historic trees in the city?

MAG observation:

Absolutely – many fully mature deciduous trees are as old, or perhaps older, than some of our historic buildings. Wanton felling of these on the pretext that you can easily plant a replacement fails to recognise the value and contribution of mature deciduous (and some coniferous) trees to character, biodiversity, as well as offsetting carbon emissions and the other benefits listed in GA4. If it is important to rescue and re-use historic buildings, even modest unlisted ones (and it is) then getting serious about valuing and protecting the city's legacy of mature trees is equally important.

We request that an audit of the city's tree population be carried out assessing their condition and longevity. Based on this develop a conservation management plan to care for those

with long lives ahead of them and managed replanting where trees are dead or dying.

Q: Do you agree that we should seek the provision of more trees to help to enhance visual amenity, improve air quality, minimise flood risk and provide shelter or shading?

MAG observation:
Undoubtedly.

10.05 Planning Policy Statement 21: Sustainable development in the countryside

We support the retention of PPS 21 and its supplementary design guidance 'Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside' which is working well. This design guidance pertains primarily to the design and siting of housing in the countryside. To close the gap and ensure other development typologies are covered we request that additional supplementary design guidance be prepared to guide the design and siting of non-residential development in the countryside, where such is deemed acceptable under PPS 21.

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