

Belfast Open Spaces Strategy

Comments by

Northern Ireland Environment Link

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These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

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We welcome the opportunity to provide comments on the Belfast Open Spaces Strategy. Open spaces play a crucial role in enhancing the fabric and liveability of the city and we fully support the commitment to re-energise and re-imagine the City through open spaces. However, we feel there is a lack of detailed actions and measurable targets to ensure the Plan delivers a 're-imagined City'.

- The health and well-being of society is inextricably linked to environmental conditions. Access to green spaces both within and outside of the urban envelope is critical to facilitating healthier lifestyles. Better access to, and provision of, opportunities for physical activity could help address sedentary behaviour which is linked to conditions such as heart disease, cancer and stroke. A healthier, more active population will reduce demand for services and over time reduce demands on the health system.
- Existing and new open spaces should provide opportunities for nature to thrive. Spaces rich in nature and biodiversity, not only enhance the aesthetic value of open spaces, but it enables these spaces to provide an enhanced array of benefits to society (e.g. carbon sequestration, improved air quality, flood alleviation, pollination etc.). Many open spaces are dominated by hard surfacing and require softening to maximise their biodiversity potential and their overall value to the City.
- The Plan recognises Belfast's ambitious growth agenda, with the potential for 66,000 new residents by 2035 and 31,600 new homes. The Plan also recognises the difficulty of creating 'new' open spaces and rather prioritises enhancing access to existing open spaces. In the context of this growth agenda, we are concerned that this will place considerable pressure on the City's existing open spaces and overuse will potentially diminish the quality of existing open spaces. We would like to see the Council commit to increase the amount of 'new' open spaces, in line with any increase in the number of city residents/users or new developments.
- There are instances of non-committal language being used within the Plan. For example, the Plan mentions maintaining and improving the quality of open spaces 'where possible' (p27). We would prefer wording that offers a much stronger commitment. The opportunities listed for improving open space should be complemented by detailed actions and proposals at neighbourhood level.
- Increasing access to existing open spaces is particularly important, especially in hotspots and areas of deprivation. While we very much welcome this intended outcome, increased access will place additional pressure on existing open spaces. The provision of adequate resources to maintain and improve existing open space is essential, as well as the creation of new high quality open spaces.
- Natural and built heritage assets require sustained and secure investment and resourcing if they are to continue to provide multiple benefits to residents from Belfast and further afield. New developments and regeneration schemes should seek to utilise and enhance existing built heritage, whilst recognising the value of old buildings for biodiversity. New developments should also be designed with nature in mind, through the use of swift bricks, bird boxes and living walls.
- The Connswater Greenway is a best practice exemplar of the multiple benefits of environmental regeneration that should be replicated in other parts of the city. The Council should look to replicate this kind of project, both in terms of scale and ambition, as well as its potentially transformative impact. Cross-sectoral partnerships will be required to progress this kind of strategic project.

- The Council is responsible for the protection and enhancement of internationally significant open spaces, such as the Lagan Valley Regional Park and the Belfast Hills and we welcome the commitment to enhance access to the surrounding countryside. However, parts of the Belfast Hills are already under pressure from overuse. The Council should invest resources to ensure that enhanced management arrangements are in place to accommodate an increase number of users and limit the detrimental environmental/landscape impact. This will ensure that the asset is maintained and enhanced and will continue to provide multiple benefits to society.
- Belfast Hills and the adjoining the Lagan Valley Regional Park are truly significant landscapes. Consideration should be given to improved levels of recognition and protection afforded to these sites. London has been designated as the world's first National Park City. As an outward looking city committed to progressing economically and socially through environmental excellence, Belfast should embrace this level of ambition in plotting its future course.
- We welcome the commitment to concentrate development on derelict or brownfield sites to limit urban sprawl and maximise the benefits of a more compact urban form. Derelict, vacant or underused land represents a missed economic, social and environmental opportunity, and in some cases an environmental hazard; derelict or vacant land presents an opportunity for creating new open space within the city; this should be prioritised and incentivised. However, any new development on derelict sites, must recognise, protect and enhance the nature/biodiversity value.
- Food can play an important role in dealing with some of today's most pressing social, economic and environmental challenges; such as obesity and diet-related ill-health, food poverty, waste and climate change. Given the work that Belfast Food Network has undertaken with BCC to develop Belfast's existing status as a sustainable food city, food should be more prominent within the Plan. For example, the Plan should look to promote opportunities for city growing/farming.
- The Plan requires clear targets and indicators to drive action and provide a baseline against which to measure success. This will assist with monitoring over the lifetime of the Plan. For example, it would be beneficial to include a number of indicators which assess how the level of human interaction with open space changes over the lifetime of the Plan. Some example indicators could include:
 - Increase numbers of users of green spaces/play areas
 - Increase in number of people who are satisfied with the quality of their local open space/play area
 - Increase in % of adults and children who live within 5 minutes' walk of green space/play area
 - Increase in % of adults making one of more visits to natural/historic environment site each month
 - Increase hours of outdoor recreation for children
 - % increase in biodiversity (native species and habitats) in Council managed Open Spaces over the strategy period from base year



We commend the Council for publishing this Draft Strategy to initiate discussion. In the next draft we would welcome the inclusion of clearer commitments and proposed actions with measurable targets/measures to be delivered or achieved over the lifetime of the Plan.