

05.10.2018

RE: BELFAST LOCAL DEVELOPMENT PLAN 2035

Dear Belfast LDP Team,

We commend the Belfast Local Development Plan Team for the extensive work undertaken to produce this Plan. We appreciate the extent to which our sector has been engaged in the process, particularly through the green and active working group.

We are pleased that strategic policies have been included around sustainable development, environmental resilience, connectivity and green and blue infrastructure networks. However, given the Council's statutory duty, we would prefer if sustainable development was listed as the first overarching policy guiding all development decisions. We are also concerned that positioning 'growth strategy' first in the list of strategic policies could lead to an approach that prioritises growth above other important strategic considerations.

We welcome the reference to climate change, resilience, flood risk and the role of green and blue infrastructure. Flooding, sea level rise and extreme weather have significant impacts on communities, infrastructure and businesses. We would like Councils to issue a statutory requirement to incorporate and manage Sustainable drainage schemes (SuDS) as part of new developments. If integrated effectively, SuDS can positively impact on water quality, quantity and amenity value for the surrounding area; reducing combined sewer overflow spills and flood risk.

There is clear understanding within the Plan that the health and well-being of society is inextricably linked to environmental conditions and that 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 can directly improve health and well-being outcomes within the City and all development should facilitate rather than inhibit opportunities for access to green space.

Development trends suggest that the planning system has not offered a strategic approach to regulating development across the Northern Irish countryside, as exemplified by, among other issues, the proliferation of large scale single wind turbines and single houses. We welcome the presumption against new housing in the countryside, given that the cumulative impact of speculative developments undermines the unique and dramatic 'landscape setting' of Belfast. We also welcome the requirement for developers to undertake landscape analysis, but would stress the

importance of Council's having sufficient landscape expertise to assess development proposals in a holistic way taking account of wider landscape character. Indeed, aspects of the SPPS are currently under review and the outcome of these reviews has not yet been published. In this context, it is appropriate to refer to a number of issues identified in our response to the review of the SPPS:

- Areas of regional and international environmental significance, such as AONBs, require additional planning controls to protect these precious landscapes from the effects of cumulative and speculative development. For example, the Council is responsible for the protection and enhancement of internationally significant natural and built heritage, such as the Lagan Valley Regional Park and the Belfast Hills.
- In relation to dwellings on farms, the provision for a dwelling every ten years is excessive. The requirement for dwellings on farms should be a needs basis with strict occupancy conditions. There is a danger that people can register a 'farm business' to exploit this liberal policy when in practice a dwelling every ten years is not essential to the operation of the farm business. This outdated Policy within the SPPS has unfortunately been endorsed within the Plan.
- It is essential that there is a continuation of visual linking between new farm dwellings and the existing cluster or farm buildings. This will minimise visual impact and help limit the spread of speculative one-off housing.

The reference to 'net gain' is timely in the context of the Natural Capital Committee's recommendation for a net gain principle to be applied to all new developments. We support the Council requiring developers to go beyond tokenism to ensure all new developments incorporate extensive greening measures. However, the 'net gain' principle should not be used to justify 'environmental sacrifice'. First and foremost, the Precautionary principle should be applied to protect biodiversity, amenity value and distinctive landscape settings.

The emphasis in the Plan on improving connectivity of green and blue infrastructure across the district is particularly important. We would urge the Council to produce an ambitious green and blue infrastructure Plan, with sufficient resourcing and investment to effectively implement and deliver the Plan. Greening initiatives should be applied across the City to ensure that greening is integrated throughout the City and not confined to a number of recognised parks.

We would also welcome attempts to implement regional or national park status for the Belfast Hills, perhaps adjoining the Lagan Valley Regional Park through a green corridor and smaller urban green spaces. This would be an ambitious, but not unrealistic option for enhancing the protection of these internationally significant landscapes. London has been proposed 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.

Although devolving planning powers to the new local councils can potentially facilitate more local input and involvement in planning decisions, a major challenge emerges to ensure that decision-making does not become overly parochial at the expense of wider public interests, thus jeopardising the delivery of regional strategic objectives. If Local Planning Committees choose to overturn the recommendation of planning officers there must be a clear rationale for why the decision is being taken and this must be communicated to the public in a timely and transparent manner.



We look forward to working further with the Council, particularly in developing a Green and Blue Plan for the City.

Yours sincerely,

Craig McGuicken
Chief Executive, Northern Ireland Environment Link

