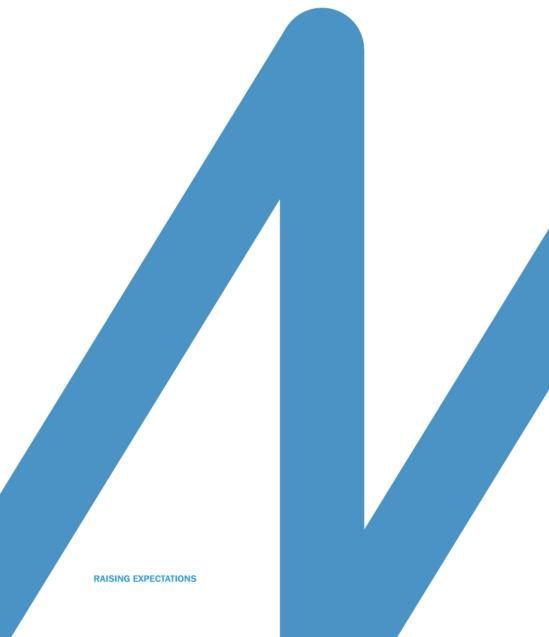**Belfast City Council**

Local Development Plan 2030 - 2035

Preferred Options Paper

MAG Condensed Response

28 | 11 | 17

Belfast City Council

Local Development Plan 2020 -2035

Ministerial Advisory Group (MAG) Condensed Response

28 | 11 | 17

By email to:

planning@belfastcity.gov.uk

1.00   General

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.

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.

The MAG consists of an Interim Chair and 6 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.

MAG is assisted by 22 Expert Advisors, independent professionals who, while they are not Ministerial appointees, are appointed through the public appointments process.

2.00   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:
The return of planning powers to local authorities in April 2015 is very welcome progress. 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.

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.

3.00 District profile

3.01 BMAP

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.

3.02 Spatial characteristics and settlement hierarchy

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 hollowed 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?

3.03 Summary of key opportunities and challenges
MAG observation:
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.

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.

- 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.

4.00   The Vision and objectives

4.01   **Q:** *Do you agree with the LDP vision?*
A: Yes.

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 expand the *Local Development Plan Vision* statement so that it becomes place specfic, 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.

4.02   <u>Shaping a liveable place</u>
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 fostering 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.

Q: Are there any issues that we have missed from our vision, aims or objectives?
A: No

5.00   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%*

5.01   <u>GR1 – Supporting economic growth preferred option</u>

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?

A: No

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.

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?

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 typologies that include the 'private rented sector' accommodation. 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?**

A: **No**

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.

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.

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.

6.00 Shaping a Liveable Place

6.01 *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.

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;

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.

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?**

A: **No**

MAG observation:
New development should make use of other previously developed or brownfield land within the city.

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

A: Yes, completely especially in this Council region.

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

A: **Yes**

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

A: **Yes**

6.02 *LP4 – Specialist accommodation for older people preferred option*

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

A: **Yes**.

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: Yes.

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.

6.03   *LP5 - Traveller accommodation preferred option*

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

A: Yes.

6.04   *LP6 – Shared housing provision preferred option*

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.

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

A: **Yes**.

MAG further observation:

Criteria are important but a design review at the earliest stage to ensure that a criteria based approach does not substitute for design quality.

6.05 *LP7 – Quality design in residential developments preferred options*
MAG observation:

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 – used terraced neighbourhood high street*

6.06 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 combined criteria for achieving healthy and 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.

6.07 *LP10 – Community cohesion preferred option*

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

What we focus on grows – 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.

'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.

6.08 *LP11 Urban Design Preferred Option*

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.

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

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.

6.09 *LP13 – Promoting greater spatial connectivity preferred option*

Q; ***Do you agree with our proposed approach to promoting greater spatial connectivity?***
A: ***Yes***

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.

Tall Buildings
6.10 *LP14 – Tall buildings preferred option*

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

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?***

A: ***Yes***

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

6.11 *LP15 – Archaeology and built heritage preferred option*

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 could 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**

Local distinctiveness

6.12   *LP16 – Local distinctiveness preferred option*

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 – 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.

6.13   Energy efficient design

LP17 – Energy efficient design preferred option

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.

6.14 *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.

6.15 *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.

6.16 *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. 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.

7.0   Creating a vibrant economy

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

7.01   *VE1 - Employment land supply preferred option*

We request a sequential approach to prioritising property assets for additional employment floor space to reduce new build requirements and reduce uptake of agricultural land. 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.

7.02   *Strategic Employment Locations*
VE2 - Strategic employment locations preferred option

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.

7.03 *Protection of existing employment locations*

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

A: **No**

7.04 *VE3 - Existing employment land preferred option*

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.

7.05 *Supporting higher education*

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

A: Yes

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.

7.06   *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.

 Retail

Q;   Do you agree with our proposed network and hierarchy of centres?
A: No

7.07   *VE5 – Network and hierarchy of centres preferred option*

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 could also be used to describe these and 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.

7.08 _VE6 – Centre boundaries preferred option_

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Q; *Do you agree that centre boundaries should be redefined?*
A: *Yes*

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 communties. 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.

7.09 *Ensuring the vitality and viability of centres*
VE7 – Ensuring the vitality and viability of centres preferred option
Class A uses and non-retail uses should be permitted to support the creation of mixed use walkable neighbourhoods. This will foster a good mix of uses supporting street vibrancy and vitality without an overconcentration of non-retail uses.

City centre

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

7.10 *VE8 – Defining the city centre preferred option*

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?

7.11 *VE9 – City centre primary retail area preferred option*

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.

7.12 *VE10 –Leisure and tourism in the city centre preferred option*

MAG observation:

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.

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

A: Yes

7.13   _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 compatible mixes of uses offering a 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:

- 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

7.14 *VE12 – Shared space in the city centre preferred option*

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

7.15 *VE13-City centre development opportunities preferred option*

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.

8.00   A smart connected and resilient place

8.01   *How will we grow Belfast?*

A smart connected and resilient place

8.02   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.

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

MAG observation:
Yes, we support this.

8.04   *Public transport network*
SCR5 – Public transport network preferred option

MAG observation:
Yes, we support 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 is required to plan the city

infrastructure to reduce vehicular use and encourage pedestrian and cycle access.

Options to help achieve this include:
- 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

8.05   SCR6 – Highway network preferred option

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

8.06 Parking Demand Management
SCR7 – Parking demand management preferred option

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

A: Yes, we agree.

8.07 _Environmental quality_

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

8.08 _SRC8 – Environmental quality preferred option_

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.

8.09 _Building Environmental Resilience_

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

MAG observation:
1. Actively support electric vehicles
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.

8.10 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.

8.11 *SRC11 – Adapting to environmental change preferred option*

MAG observation:
We support this.

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.

8.12 Approach

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

A: **Yes.**

8.13 *Flood risk management*
SRC12 – Flood risk preferred option

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.

8.14 *SCR13 – Waste infrastructure preferred option*

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.

8.15 *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.

8.16 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.

8.17 *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.

8.18 *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.

8.19 *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.

8.20 *Planning Policy Statement 18: Renewable energy*
The council needs to have a policy that actively encourages the retrofit of renewable technologies in the city.

9.00 ***A green and active place***

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

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

9.02 *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 integrated green and blue infrastructure network of green spaces and water features, providing access to amenities for recreation, walking, cycling and wildlife?**

A: Yes. This should 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.

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.

9.03   *GA3– Natural heritage preferred option*

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

A: Yes

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

A: Yes.

9.04   *GA4 - Trees preferred option*

MAG observation:
We support this in principle but it needs to be substantially strengthened.

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

A: Yes

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?**
A **Yes**

MAG observation:

9.05 *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.