



Belfast City Council

Report to:	Development Committee
Subject:	Planning and Transport Related Issues
Date:	13 August 2008
Reporting Officer:	Marie-Thérèse McGivern Director of Development ext. 3470
Contact Officer:	Shirley McCay Head of Economic Initiatives, ext 3459 Keith Sutherland, Planning & Transport Policy Mgr, ext 3578

Relevant Background Information

This report provides updates on issues previously considered by the Committee, outlines ongoing consultations and seeks approval for the appointment of a Planning and Regeneration Officer to work within the Planning and Transport Unit.

Key Issues

Belfast Metropolitan Area Plan Update

The final stage of the draft Belfast Metropolitan Area Plan (dBMAP) Public Inquiry concluded in May 2008. A summary of the Council's engagement at Stages 1 and 2 of the Public Inquiry is appended to this report for information (**Appendix 1**).

The Department of the Environment have indicated that finalisation of the Public Local Inquiry Report by the Planning Appeals Commissions will occur in early 2010. The report will then be considered by Planning Service and no date has yet been set for publication of the final version of the BMAP.

The protracted timescale for the development and consideration of the draft plan has resulted in a situation where it is likely that the final plan adoption will occur in a period where the transfer of responsibilities for local plan preparation and maintenance will have commenced. The plan as it relates to Belfast will, on formal adoption, become an important element of the planning policy context for the city.

In light of the likely timescales and the transfer it would be appropriate for the Council to seek clarification of process and adoption mechanisms in the context of the Review of Public Administration (RPA). The Council following local government reorganisation will have responsibility for local planning and in seeking the clarification Council should ensure that the opportunity to directly influence the final form of the adopted plan is available.

It is suggested that Committee notes the contents of the appended information paper and requests clarification from Planning Service of the proposed processes and timescales for the final adoption of the dBMAP in the context of the RPA.

Sprucefield

Planning Service is currently considering a pre-application submission in respect of the development proposals for a department store and 15 separate retail units at the Sprucefield Regional Shopping Centre. This application replaces the development proposal for a department store and 29 units that was the subject of the successful legal challenge by the Council and other parties in 2007.

The modification of the development proposal does not address the principal concerns in relation to the potentially adverse impacts on general retail policy and the surrounding town and city centre retail.

Committee is requested to note the position and intention to bring the issue back to a future meeting for more detailed consideration of the potential implications and if appropriate a formal Council response.

Regional Development Strategy (RDS) Review

The 5 Year Review has been carried out and Adjustments to the Regional Development Strategy 2015 document published in June 2008. The Minister for Regional Development announced on 9 June 2008 the intention to start the 10 year review process. A summary of the broader strategic issues arising from the Regional Development Strategy Review announcement is appended to this report (**Appendix 2**).

The Minister for Regional Development has established an 'External Working Group' and during the initial consultation suggested a timetable and proposed consultation structures for the review which would see the publication of the draft in 2009 and adoption in 2010.

The RDS is an important statutory document for the continued development of Belfast within the wider region and setting the strategic context for exercising local planning functions. Council engagement in the review process will be critical to ensure that the importance and role of the city to the development of the metropolitan area and Northern Ireland continues to be recognised. The Council, through the work on the State of the City, has carried out research that would clearly inform the proposed ten year review and could be provided to the Department for regional Development as part of the initial engagement.

The nature and complexity of the RDS issues and the proposed consultation processes will require the Council to adopt a flexible approach to the engagement. To facilitate the engagement it may be appropriate to replicate the internal arrangements adopted for the BMAP process utilising a focused approach with Members and officers.

It is suggested that Committee notes the contents of the appended issues paper and approves the proposals for the internal consultation and the submission of existing relevant research to the Department for Regional Development.

Yorkgate Junction

A request for initial comments in respect of the proposed Yorkgate junction modifications was received from consultants (Scott Wilson Consultants) acting on behalf of the Department for Regional Development. The initial responses to the consultation (**Appendix 3**) were based on technical comments, previous submissions or existing information.

The initial response is provided for information and Members are requested to note the contents in advance of the proposed Special Committee on the subject of the Yorkgate proposals.

Planning and Regeneration Officer

The work of the Department in relation to significant planning and regeneration initiatives has continued to increase. In addition to the potentially significant changes under the Review of Public Administration (RPA) there are continually increasing levels of activity for the Council in relation to the coordination of responses to significant development proposals and a requirement for effective monitoring of the context for planning decisions (irrespective of their scale). Whilst the work in relation to specific initiatives has been accommodated by the diversion of resources this cannot be sustained and would not address the need for a structured approach that would enable the Council to engage more consistently and effectively in the planning and regeneration processes.

The requirement for an additional post is based on a package of potential activities which if addressed would enhance the Council's ability to effectively engage in what will be a changing planning and regeneration context including issues such as planning gain, tall buildings, design, and transport infrastructure. The post would be an integral element of the approach to influence the wider development of the city to reflect the corporate objectives for the Council. This would build on the corporate objectives established through the Masterplan, Transport Policy and dBMAP/RDS processes in relation to brownfields, housing, transport and regeneration.

Harnessing the potential investment in the city to provide a positive legacy will be critical in sustaining the recent social, economic and physical improvements in Belfast. This establishment of this post offers the opportunity for the Council to continue the effective engagement in these critical processes and begin the process of integration of activity across the organisation in advance of the future changes that will result as part of the public administration reviews.

No additional capacity exists to carry out the current specialist work and in the absence of a dedicated resource the potential to influence these critical external processes and developments will be reduced. The absence of the additional capacity would undermine the Council's ability to translate the ongoing work in relation to planning policy development into concrete actions and initiatives that would positively influence both Council and other developments in the city.

It is suggested that Committee approve the proposal to establish the post of Planning

and Regeneration Officer subject to the post being evaluated by BIS and accommodation within existing revenue estimates.

Resource Implications

Human Resources

The current staff resources are not sufficient to cover the increased workload and areas of responsibility making it impossible to provide an integrated approach and consistency in relation to policy and performance related activities. This means that the capacities of the Council and Department to effectively engage in regeneration and development processes are restricted at a critical stage in the development of the city. It is recommended that the post of Planning and Regeneration Officer be created in order to meet increased workloads and responsibilities. This would provide for a more effective operation and address the problem of the increased remit and duties falling within the remit of the Planning and Transport Unit.

Financial Implications

The proposed post would reduce the reliance on hired and contracted services for the provision of specialist advice in relation to these issues.

Recommendations

It is recommend that Committee:

- note the contents of the appended information paper and request clarification of the proposed processes and timescales for adoption of the;
- note the current position in respect of Sprucefield;
- note the content of the appended issues paper and approves the proposals for the internal consultation through a focused approach with Members and officers and the submission of existing research to the Department for Regional Development;
- note the content of the initial Yorkgate Junction response; and
- agree to the recruitment of the Planning and Regeneration Officer post within the Planning and Transport Unit.

Key to Abbreviations

dBMAP - Draft Belfast Metropolitan Area Plan
RDS - Regional Development Strategy
RPA – Review of Public Administration

Documents Attached

Appendix 1 Summary of Belfast City Council Participation at Stages 1 and 2 of the Draft Belfast Metropolitan Area Plan Public Inquiry
Appendix 2 Summary of the Key Issues for the 10 Year Review of the Regional Development Strategy
Appendix 3 Initial Responses to the Department for Regional Development requestsfor information in respect of the Yorkgate Junction area

APPENDIX 1

The NI Planning Service issued the notice of intention to prepare the Belfast Metropolitan Area Plan in September 2000 and the draft plan was published on 30 November 2004. Following extensive consultation and consideration with elected Members and Officers within Council Departments, the Council submitted the first representations to the draft plan (dBMAP) in January 2005.

The Planning Service published the full list of more than 3000 representations to the draft plan in the autumn of 2005 for inspection and the Council made a further submission on 2 November 2005.

Plan Amendment No.1 to the dBMAP was published on 14 February 2006 outlining revisions including additions, modifications and deletions of plan proposals. Council representations to the plan amendment were submitted on in April 2006.

The Council's principal concerns with the draft plan related to Housing, Waste, Open space, Transport, Arterial Routes, Air Quality, the North Foreshore, City Centre (designations and strategy) and Retail (hierarchy and designations).

The final stage of the Belfast Metropolitan Area Plan Public Inquiries concluded in May 2008 with the Department of the Environment indicating that publication of the Planning Appeal Commissions Public Local Inquiry Report will occur in early 2010. No date has yet been set for publication of the final version of the BMAP by Planning Service.

dBMAP Public Inquiry Stage 1: Strategic Issues

The Planning Service resolved to hold a Public Local Inquiry, coordinated by the Planning Appeals Commission (PAC), for the purpose of considering objections to the Draft Plan including Plan Amendment No.1. Stage one of the inquiry commenced in April 2007 and dealt with the strategic or regionally significant issues including the main policies and proposals.

The Council participated directly in hearings in regard to some of the more contentious issues such as housing, retail, office strategy, waste and transport.

The main issues arising for Stage 1 of the public inquiry related to:

- **Settlement Strategy** – Objectors were seeking flexibility in the development limits of small settlements in order to cater for housing need/ demand. In addition public inquiry sessions also considered the broader settlement strategy, housing allocations and distribution. The Council evidence advocated the compact city model in regard to the distribution of housing, emphasising the sustainability benefits of appropriate increases in urban density. In addition the Council highlighted the need to set clearer targets for brownfield development in the Belfast Metropolitan Area, to encourage the redevelopment of under used land or property.
- **Social/Affordable Housing** – The Council following on from engagement in the Semple Report proposed a rewording of Affordable & Social Housing Policy HOU3, which would include a percentage of residential developments to be set aside for affordable housing; with the aim of creating sustainable and balanced communities. The evidence sought to include a mechanism to address the provision of affordable housing as part of the plan process. The

submission highlighted that the failure to include policies was contrary to the guidance set out in the Regional Development Strategy and view that Development Plans were appropriate vehicles to address such locally specific housing issues. During the BMAP Public Inquiry sessions objectors were unwilling to accept these proposals and cited the potential detriment to the construction industry from the adoption of such a policy. Discussions focused on PPS12 and the performance of the Department in addressing the demand for social and affordable housing.

- **Developer Contributions** – The Council case stated that the Plan should focus on this issue and not simply leave consideration or regulation to regional policy. Whilst a specific policy amendment was not proposed, it was suggested that this issue could be dealt with via more effective Key Site Requirements. Examples of the harnessing of developer contributions by local authorities in the UK and Ireland were cited as part of the evidence. In response Planning Service stated that the mechanism for delivering developer contributions at present was effective, although it was conceded that it was not commonly utilised. The Department concurred that there were certain circumstances where developer contributions could be considered, however, the need for an additional policy was not accepted as a review of PPS1 was felt to be the appropriate means of addressing this matter. The Council highlighted the contrast between the Department's sparse use of Article 40 agreements in comparison to the general use of the comparable legislation in Scotland, England and Wales.
- **Employment Strategy** - The Department accepted that the areas zoned for 'industrial' use should now be identified as 'employment areas', with developments relating to areas such as Research and Development acceptable; however, it was clarified that general office development would not be acceptable. The mechanism and calculations of the appropriate level of supply of such land was questioned by the objectors. The Department stated that there were no formal mechanisms for the calculation of the appropriate supply and that their approach had been to give a generous proportion of land over to these uses.
- **Transport** – The Council submitted an alternative broad Transportation Strategy to strengthen sustainable transport options and resolve what was considered to be an omission from the draft plan. Through the evidence the Council sought clarification and justification in relation to the need for proposed road schemes (Bankmore and Connsbank) and detail was sought on Rapid Transit alignments and phasing. The Council position was based on the RDS Transport Corridor approach to increase the region's accessibility to Europe's transport network as a means of assisting future economic growth. The Council sought to align the metropolitan area road networks to meet this strategic objective.
- **WWAY** – The Council called for integration of the WWAY proposal with the rest of the transport network in West Belfast and to recognise opportunities for developer contributions towards the scheme implementation. The evidence also highlighted that there should be a greater emphasis on the need to link this route with city centre routes and other rapid transit provision in order to create a sustainable public transport network.

- Super-Route – The Council sought further assessment to ensure better links with main attractors such as the Forestside Shopping Centre along with reducing impacts on Belvoir Park Forest.
- CITI – The Council expressed concerns on the alignment of this route. Other parties involved in the hearing highlighted that the operations by Bombardier and Harland and Wolfe would be significantly affected by the proposed alignment. The Department acknowledged that there were problems with the proposed alignment and that it would be given further consideration.
- Bankmore Link - The evidence from Planning Service stated that the southern section of the 'inner ring road' would provide 'capacity reallocation', allowing for the city centre public realm and public transport improvements although detailed design work had not been completed. The absence of a detailed justification for the road and air quality management concerns were the focus for the Council in the context of evidence that highlighted the work in other cities to reduce the impact of existing inner ring roads and increase pedestrian priority. The evidence also emphasised that the EU Directives stated that it was not an option to simply consider the broader impacts and modify air quality problems within different areas.
- Connsbank Link – The evidence from Planning Service stated that the proposed road along with Holywood Arches By-Pass would now be provided with public money (not through developer contributions as stated in the plan) although it was unclear as to where this money would be sourced. It was suggested that the Proposed road scheme may be incorporated into the budget allocation for the Sydenham By-Pass and the E-Way. The Council highlighted the potential impact on the Connswater Community Greenway proposal, the increase severance to Victoria Park and King George V playing fields (with this loss a football pitch as part of the development); the continued blight to the Holywood Arches area and the impacts on the surrounding community. The Department suggested that the link was required to replace Dee Street bridge as part of the Sydenham By-Pass widening.
- Sydenham By-Pass widening & A2 Junction – The Councils main concern related to the impact of the proposals on Victoria Park & King George V playing fields, which would result in the loss of a number of important facilities. The Council evidence suggested that junction could be accommodated on land within the Harbour Estate and options other than road widening should be considered to accommodate what was purely a 'peak traffic' commuter problem. The Council submissions suggested that public transport should be further encouraged along this 'corridor' as the existing proposals would contribute to increased car use and journeys into both Belfast City Centre and any new developments at Titanic Quarter.
- **Retail Strategy & Sprucefield** – The objectors argued that there were high levels of vacant retail warehousing in NI and if Sprucefield is to expand as a regional centre, comparison or city centre type retailing must be permitted to support the broader development of the centre as a "Regional" facility. The John Lewis development although not the subject of the Inquiry was discussed in the context of the strategic significance of allowing a large comparison store development on this site, in contravention of the retail policies. The Department and the Council sought to defend the draft BMAP

policy to protect the primacy of Belfast and other city centre through policy control over the scale and nature of retailing at Sprucefield.

- **Office Strategy** – A range of objectors tabled a revision to the strategy that sought to remove the policy objective of ‘promotion’ of Belfast City Centre. In tabling this amendment the objectors also called for greater ‘dispersal’ of office development away from the City Centre, encouraging the growth of office development in Belfast Harbour and Lisburn. The Department and Council argued that the relaxation of restrictions on office development in this area may have a detrimental impact on Belfast city centre and the sustainable development of the region. Objectors also suggested that the Queens Office area should be elevated in terms of the hierarchy of city office space. It was argued that QUB at present is restricted in its use of building stock because of its location in a conservation area. Planning Service conceded during the Inquiry that the Harbour Area could be supported more in the policy wording but did not merit a Major Employment Location designation.
- **Air Quality** – The Council proposed an amendment to policy UE8 which aimed to strengthen planning powers in relation to public health, based on improved consultation with District Councils. Following the Councils representation at the stage 1 public inquiry and its call for the inclusion of specific air quality policies, the Department stated that Policy UE8 should remain in place until regional guidance addressed the issue. Other objectors suggested that this policy represented another layer of control which would make development increasingly difficult.
- **Arterial Routes** – Objectors wanted this designation to spread beyond the Belfast area (to cover Lisburn), however, this was rejected by the Department as the need for designation only related to areas of Belfast which have a tradition of commerce and are the focus of community activity.
- **Open Space Designations** The Council put forward a revised Open Space Strategy and new policy OS5 which called for greater links between developments (mainly residential) and open space provision – calling for both the enhancement of existing space and further facilities where needed. The evidence from Planning Service suggested that these issues were covered via regional guidance and policies already in the plan. In relation to Policy OS2 Community Greenways – objectors proposed a policy amendment which aimed to focus the policy measure on the potential ‘harm’ development could cause and remove the restrictive nature of the policy. Planning Service argued that the policy did not preclude development but was meant to be restrictive in order to protect these links.
- **Tourism Policy** The Department conceded that any reference to Lagan Valley could be dropped from policy T2, but did not concede that any planning applications under this policy should be considered in tandem with the Council. The Council evidence highlighted that significant role played by councils in the promotion and development of tourist attractions and suggested they should be given a significant formal input into the assessment of tourism developments. Planning Service stated that as the Northern Ireland Tourist Board had been consulted in the preparation of the tourism policies, and that it was not considered necessary to further consult with councils.

- **Environmental Designations** Natural Environment Strategy and policy ENV1 – The Council sought to ensure that the restrictions in place on such areas should not unnecessarily restrict the development of adjacent sites. Planning Service conceded that the policy should move away from a blanket restriction over the development of these sites to placing an emphasis on the need to show how a proposal would minimise potential impacts. Sessions on ENV2 (SLNCIs) and ENV3 (LLPAs) has similar outcomes, with a consensus that protection should be accented in preference to restriction.

Stage 2 Public Inquiry: Site Specific Issues

- **Reconvened Housing Matters** The reconvened strategic housing matters sessions considered the Departments position since the publication of the June 2007 paper indicating an uplift in the Housing growth Indicators. The Department considered the previous matrix approach as suitable to assess sites for housing on a comparable approach rather than a pro-rata basis. The debate focused on the mechanism to bring in additional sites for housing with objections calling for more flexibility and questioning the validity of the matrix assessment. The Council called for additional housing supply to be accommodated within the urban footprint. The Council evidence suggested that the urban capacity studies should be updated and consideration given to appropriate higher urban density, brownfield development and phasing of sites.
- **Retail Strategy & Sprucefield** The Planning Service position did not change during Stage 1 or 2 of the public inquiry. Objections at stage 2 were site specific as opposed to strategically focused. The objectors attempted to demonstrate that sites had existing visual and infrastructural linkages with the Regional Shopping Centre which therefore made them suitable for inclusion within the boundary. Strategic retail policies were not revisited during this session.
- **Boucher Road Estate** Belfast City Council as a significant land owner on the Boucher Road attended the public inquiry to ensure that land designations did not adversely affect the vitality of the current land uses in this location. Planning Service revised the plan position that the land should be zoned for employment/industry. In evidence Planning Service stated that the land should be designated as ‘white land’ and therefore all applications to develop these lands would be considered on their individual merits and compatibility with existing uses.
- **Harbour Strategy** The objections by other organisations related to the application of restrictive policies for the City Airport and the visual amenity of development.
- **North Foreshore** The Council objected to the detail of the open space designation and the division of the site into two zones. Planning Service agreed that the site should be zoned as a mixed use site and the specific uses outlined through Key Site Requirements i.e. open space, waste and Park and Ride. The Council position sought deletion of the specific Park and Ride and port related uses from the Key Site Requirements. Planning Service did not concede to the removal of the park and ride designation. The Council

also objected to identified requirements relating to the Fortwilliam junction upgrade.

- **Titanic Quarter** In regard to the Titanic Quarter zonings, the Council sought a designation which complemented the role of the city centre. Planning Service accepted separate objections in relation to removal of the all zonings with the exception of Zone A; this improved the flexibility of use for the site. More specifically the Council sought the inclusion of a cultural/heritage use for portions of the site. During stage 2 it was agreed that the development of the Titanic Quarter should evolve on a grid system with a main street and boulevards.
- **Gasworks** The Council argued that the designation of the Gasworks site as a Development Opportunity Site and Gateway zoning should be extended to take account of the wider development potential for the site. Planning Service conceded that the Gateway and Development Opportunity Site designation could be extended and suggested the wording *'To use the context of the gasworks site and specific relationships of development opportunity site to surroundings streets to form a gateway presence or a particular gateway'*. Planning Service commented that this may be achieved by developing sites together so that they interact coherently. The designation of the site as a 'gateway' to the surrounding streets was considered and it was felt that development could operate as a natural gateway from the established streets into the new gasworks development.

APPENDIX 2

The Regional Development Strategy (RDS) was developed as a spatial plan designed to support the balanced growth of Northern Ireland. The core of the RDS is comprised of strategic policy guidance that seeks to provide the context for planning across the region. The forty three specific Strategic Planning Guidelines seek to influence development and planning: at the regional level (*Strengthening Regional Cohesion in a Global Context*); at sub-regional level (*The Belfast Metropolitan Area, Londonderry: Regional City for the North West, Rural Northern Ireland*); and thematically (*Meeting Housing Needs, Supporting Economic Development, Developing a Regional Transportation System, Caring for the Environment*).

The Department for Regional Development recently completed a five year review of the RDS which considered the need for detailed adjustments, but did not address the principles in the regional framework. The results of that review were published as "Adjustments to the Regional Development Strategy" in June 2008 with the main modifications applying to aspects of policy on economic development, tourism and rural areas. Immediately prior to the publication of the adjustments the Minister announced the Department's intention to begin the process of the ten year review.

The processes towards this review have been initiated and the has established an 'External Working Group' and during the initial consultation suggested a timetable and proposed consultation structures for the review which would see the publication of the draft in 2009 and adoption in 2010.

The Minister for Regional Development in his original announcement stated that this would be a "*fundamental review of the regional development strategy*" and that the new strategy would be different "*it will be relevant to key stakeholders and flexible enough to deal with changing circumstances, yet robust enough for decision-making; it will set priorities and list a selected number of key infrastructure projects that are essential for economic growth; it will take account of, and be relevant to, structures and functions that emerge from the review of public administration; and it will take account of the many changes that are happening around us*".

The RDS is an important statutory document both for the continued development of Belfast within the wider region and in setting the strategic context for exercising local planning functions. Council engagement in the review process will be critical to ensure that the importance and role of the city to the development Northern Ireland continues to be recognised and that the potential remains for the development of local planning policies to support the sustainable development of the city. These two Key issues are considered below in relation to the recent announcement and initial actions the Council may need to consider in response to the announcement.

City and Region

The Assembly debate at the time of the announcement and subsequent discussions as part of the initial consultation have highlighted the tensions around the perceived issues of regional disparity and the fundamental nature of the review highlights the necessity for the effective engagement to ensure the continued RDS recognition of Belfast as the "*economic engine for the Region as well as being the regional centre for administration, specialised high order services and cultural amenities*".

This issue and the interdependence of regional cities with their hinterland was specifically addressed in the work commissioned from the OECD, which in turn formed an important part of the recent State of the City Conference. Professor Peter Tyler, Director of Studies in Land Economy at St Catherine's College in the University

of Cambridge, presented key findings for Belfast from the OECD which concluded that:

- the success of Northern Ireland and quality of life for all citizens over the next 25 years will crucially depend upon the success of Belfast. (This echoes the message of previous State of the City conferences which showed Belfast to be NI's regional driver like other cities in other GB regions) Belfast is a major hub for both business and employment and any failure to fully exploit its potential will negatively impact on surrounding areas.
- The city should not be perceived to be in competition with other parts of Northern Ireland but rather as a gateway for trade, employment, services and visitors and as a magnet for private sector investment.
- the recent Programme for Government twin objectives of securing enhanced economic growth, whilst at the same time promoting social inclusion and equality across the region and its individual parts were consistent with City's own objectives.

The OECD evidence based report would usefully inform the review of the Regional Development Strategy that seeks to set directions for the location of jobs, houses, businesses, public services, and facilities across the whole region. This evidence based approach will become increasingly important as the Regional Development Strategy continues to evolve and become more closely linked to public infrastructure investment with the flexibility to accommodate economic growth.

Regional Development Strategy and Local Planning / Strategy

The Minister stated that the RDS will be a means to an end rather than an end in itself. This statement reflected what would be a more involved role for the plan and Department *"that must concern implementation, and the actions and priorities necessary to deliver the vision"*. From the announcement it was clear that the Minister considered that the revised strategy would have clearer linkages to other planning mechanisms which *"must set out how connections could be made to deliver a more sustainable future development"*.

This suggests a greater role for the strategy in informing how places are shaped and developed at a local level. The approach to the review provides the opportunity to develop a new form of working between the strategic and local planning levels, which could reflect the potential structures that may evolve as part of the Review of Public Administration.

The statement recognises the need to take account of structures emerging as part of the review of public administration and whilst regional planning and policy statements will remain a central Government function, it accepts that relationships with local planning and development management must be structured in an efficient and effective way.

The benefits of this new more integrated approach is recognised in the findings of the five year review and is highlighted in the consideration of the relationship between the RDS and the Investment Strategy. Whilst the potential benefits of the better integration are clear the details in relation to the future statutory relationships between the Regional Development Strategy and local planning /plans will need careful consideration to ensure the retention of a degree of autonomy.

The five year review highlighted that the RDS did not have the influence that was anticipated due to a combination of factors, including insufficient detail and clarity on matters such as housing need, rural development, and the growth of cities and towns. There will be a direct relationship between the level of prescriptive detail in the RDS and the degree of local autonomy that may be available to local planning authorities in relation to local policy and the scale of potential development.

APPENDIX 3

Development Department

Your reference

Our reference KS/P&T/89101

Being dealt with by Keith Sutherland (ext: 3578)

Date 7th July 2008

Mr Gareth Coughlin
Senior Environmental Scientist
Scott Wilson
Beechill House
Beechill Road
Belfast
BT87RP

Dear Mr Coughlin,

Re: M2/M3/A12/York Street Interchange – Environmental Assessment

I refer to your letter dated 28 May 2008 and subsequent discussions concerning relevant constraints or factors that should be taken into account when considering the proposed junction arrangements.

As discussed, any issues arising in relation to the technical aspects, highlighted by the Environmental Protection Unit, should be progressed through direct liaison with Roisin Kerr and her colleagues. The Council would, however, have additional observations and comments, in addition to those outlined by Environmental Protection Unit in separate correspondence dated 1st July 2008.

The more general observations and information relate to policy and operational issues in respect of existing Council assets and potential developments that lie within the broad area of interest identified on the plan appended to your correspondence (S105296/E/SK001). Each of the different elements is considered in turn below.

Council Assets

The Council has interests (through ownership and lease) in a number of properties within the identified area of study as identified on the appended plan. These properties or facilities include:

- Albert Memorial Clock
- North Queen Street Playground
- North Queen Street Playcentre
- Corry Place Port Health Unit
- Custom House Square Public Conveniences

The enclosed plan also identifies, for information, additional property adjacent to the area of interest for the Environmental Assessment. The Council would obviously have a particular interest in relation to potential environmental or operational impacts on the use or maintenance of these facilities/ properties.

Council Policy

The Council through engagement in the Belfast Metropolitan Area Plan and associated documents presented a consistent approach to proposals for the development of new transport infrastructure such as the inner ring and Sydenham by-pass.

The Council has previously raised a number of strategic and policy concerns in relation to such proposals. The junction proposal involves increasing the road network capacity in an area where there is existing residential accommodation within a city centre location. As indicated there are implications in relation to air quality management and the impact the development of this infrastructure may have on the local residential accommodation or existing communities. This proposal should be supportive of the need to consider alternatives to increased road infrastructures and the potential for smarter choices as outlined in the Government White paper on *The future of Transport* and supported by the transportation unit of the DRD Roads Service.

In relation to transport infrastructure and the integration of land-use planning and transportation the Council advocated the preparation of Transport Corridor plans as part of the Belfast Metropolitan Area Plan Inquiry. In addition to the existing five transport policies the Council proposed an additional Transport Policy in relation to the preparation of Corridor Plans. "Transport Corridor Plans (as required by SPG-BMA3) will be prepared for each of the Metropolitan Transport Corridors (identified in RDS Diagram 5). The Transport Corridor Plans should integrate the development of sites, in particular housing and employment, with the proposed transport network and will provide a phased programme for the implementation of improvements to transport infrastructure and services that enhance accessibility for all members of the constituent communities.

It was proposed that all development proposals within the Metropolitan Transport Corridors should be compatible with the relevant Transport Corridor Plan which will identify where the application of differential parking and access standards may be applied to take account of both existing accessibility and proposed enhancements. Transport Assessments prepared in support of development proposals would be required to contribute appropriately towards the implementation of identified transport infrastructure and services in accordance with the Transportation Strategy.

The consideration of the route options in this corridor and wider context should also address opportunities for any new road configurations to be developed as more traditional urban streets to ensure minimisation of potentially adverse impacts on the surrounding communities. The Council would also have concerns regarding the negative impact of the new road infrastructure in terms of the severance of the inner north communities from the city core and the potential for the existing separation to be exacerbated. In addition to evaluation or addressing the existing severance presented by the junction the potential for new severance should be considered in relation to the proposals both from the base position and for projected junction operating capacities.

The consideration of the junction option in the context of the broad area of assessment (identified on plan SK001) requires the assessment of the opportunities for the reallocation of existing potentially surplus road space within the surrounding areas. Increased efficiency of the proposed junction arrangements should have a positive impact on the northern city centre in relation to potential for the redesign of Dunbar Link and the reduction in road space that could contribute to enhanced connectivity within the city centre and the integration of the areas to the north of the Frederick Street/ Dunbar Link axis.

Council Proposals

In relation to Council potential future developments or responsibilities there are two distinct issues that you may wish to take into account as part of your study and future considerations:

- the proposed Skate Park
- current discussions in relation to the transfer of former Lagside assets.

The proposed Skate Park would be located on land below the current cross river bridge off-ramp to the rear of properties on Nelson Street and Little Patrick Street. This facility is to be developed on land owned by the Northern Ireland Transport Holding Company utilising both Council and external resources.

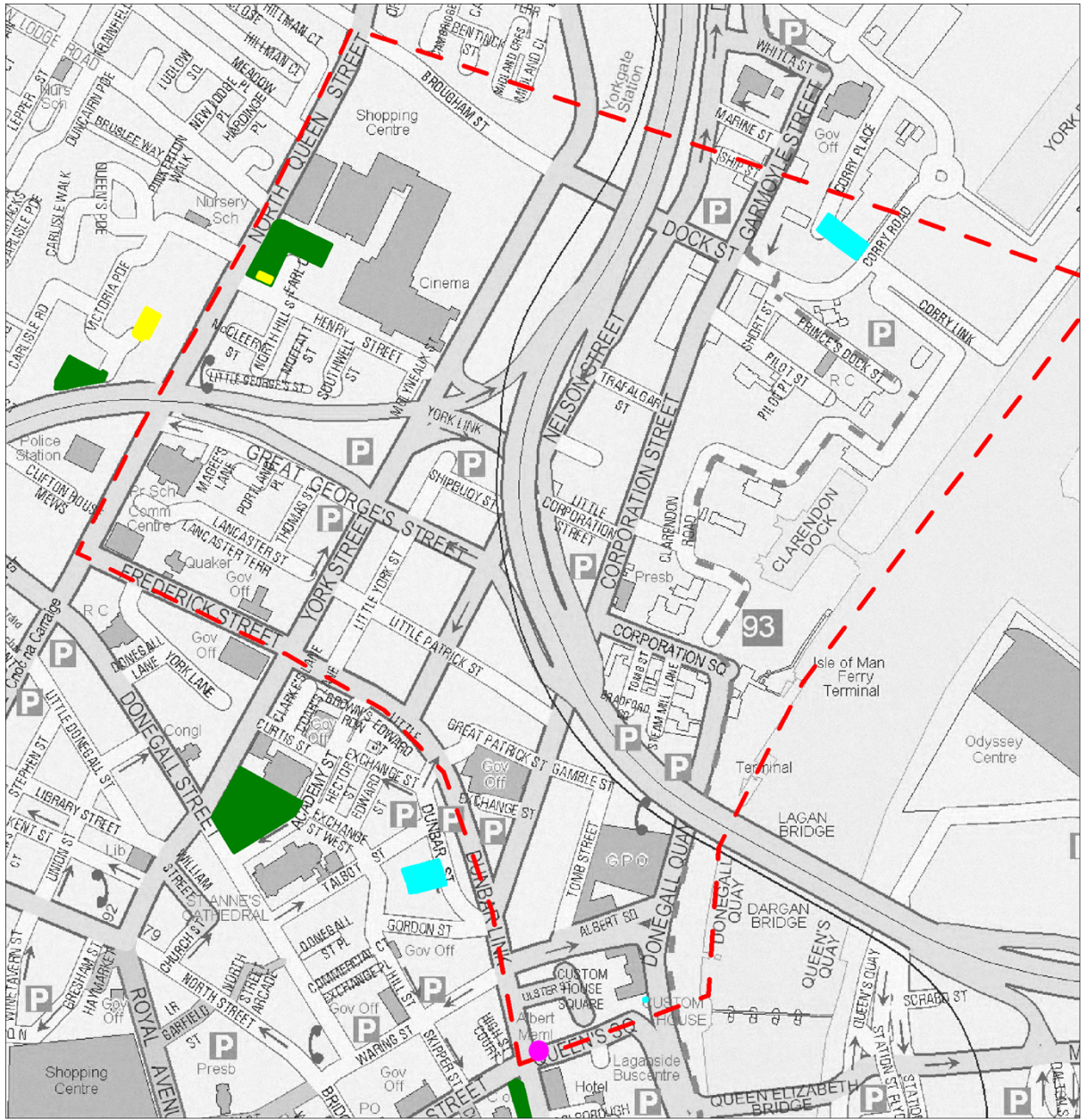
Lagside Development Corporation previously owned a number of sites within the area which are currently administered by the Department for Social development. The Council is currently in negotiations with the Department in relation to the transfer of these assets that include Custom House Square, Lagan Weir & Lookout and adjoining lands.

Whilst there are no specific development proposals for these sites the Council would, as above, have a particular interest in relation to potential environmental or operational impacts on the use or maintenance of these facilities/ properties.

The Council would, therefore, welcome the opportunity for further discussion of the scheme and the potential implications once your initial scoping activity has been completed. In order to ensure ongoing coordination, outside of that in respect of the detailed air quality issues, I would suggest that future correspondence or contact is channelled through Keith Sutherland (sutherlandk@belfastcity.gov.uk or 028 9027 0559)

Yours sincerely,

Marie Thérèse McGivern
Director of Development



SW/HB/115522

Roisin Kerr

3319

1st July 2008

Mr Gareth Coughlin
Senior Environmental Scientist
Scott Wilson
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BT87RP

Dear Mr Coughlin,

RE: M2/M3/A12/YORK STREET INTERCHANGE – ENVIRONMENTAL ASSESSMENT

I refer to your letter dated 28 May 2008 requesting information regarding relevant constraints or factors that should be taken into account when considering the above junction arrangement. Our comments are as follows:

AIR QUALITY

I would advise you that as part of the National Air Quality Strategy the Council carries out reviews and assessments of air quality within Belfast. These have identified areas where the prescribed National Air Quality Objectives are or are likely to be exceeded. This proposed road scheme lies within an area that has been declared as an Air Quality Management Area (AQMA). This area was declared for predicted exceedences of both the nitrogen dioxide and particulate material annual mean objectives as well as exceedences of the particulate matter 24 hour mean objective and the nitrogen dioxide 1 hour mean objective. This area is described as the M1-Westlink corridor AQMA and its location can be viewed at www.airqualityni.co.uk/laqm_sca.php.

This department is concerned that the proposed development may have a significant impact on air quality in this area and possibly expose residents to poor air quality; we would therefore request that the proposal is accompanied by a detailed air quality assessment. This assessment should employ a suitably robust atmospheric dispersion model, should have regard to recent, up-to-date guidance and best practice for air quality dispersion studies and specifically include:

1. A detailed description of the proposed scheme including: traffic flow predictions before and after construction (to include AADT, AM Peak and PM Peak), predicted traffic emissions (vehicle composition, speed, etc), nearby current receptors and any future potential receptors.

2. A detailed atmospheric model of the existing air quality surrounding the proposed scheme which takes into account:
 - a. existing and surrounding sources of air pollution,
 - b. background air quality concentrations
 - c. meteorological data
 - d. the surrounding topography
 - e. the surrounding surface features that may effect dispersal.
3. In order to determine the robustness of this modelled baseline prediction verification against monitored data that has been derived following Government Technical Guidance Document LAQM TG(03) is required.
4. A modelled prediction of the air quality surrounding the proposed scheme for the year that the development is due to be operational without the development in place. This prediction should take account of forecasted traffic flow increases surrounding the proposed scheme.
5. A modelled prediction of the air quality surrounding the proposed scheme with the development in place and operational.
6. A comparison of the impacts on air quality as a result of this proposed scheme is required and compared against current and proposed EU Limit Values and UK Air Quality Strategy Objectives. The assessment must take into account all relevant exposure and potential impacts on the declared AQMA.

I trust that this is satisfactory. If you require further information please do not hesitate to contact me on the number shown above.

Yours sincerely,

Roisin Kerr
Environmental Health Officer
(Environmental Protection)