

DRAFT

Submission from Belfast City Council to DRD

A RESPONSE TO 'SHAPING OUR FUTURE REGIONAL DEVELOPMENT STRATEGY (RDS) 2025'
CONSULTATION 10 YEAR REVIEW

18/03/2011

Contents

Contents	2
Purpose of submission.....	4
1.0 PART ONE General / Strategic Policy Response	4
1.1 The Review of the Belfast City Masterplan	4
1.2 Emerging Themes	5
1.3 Priorities	5
1.4 The role of the RDS - Economic support for core in recognition of wider benefit..	6
1.5 RDS response	7
1.6 Proposed Growth Model.....	7
1.7 An Urban policy	8
1.8 Growing the City	9
1.9 Housing Growth Indicators	10
1.10 Future adjustments to Housing Growth Indicators	10
1.11 Brownfield land.....	11
1.12 Employment	11
2.0 PART TWO: Specific Response.....	15

Summary of strategic issues for the review:

The preferred RDS strategy based on a polycentric growth model is inappropriate for the current economic climate and threatens to undermine the longer term performance of the regional engine, centred on the Belfast Metropolitan area, and other key urban centres. The development strategy should focus on centres that have established urban capacity and that can optimise the utilisation of committed infrastructure investment thereby maximising the potential for sustainable balanced development. The implications of the current preferred strategy risks reducing the potential for even modest economic recovery as scarce resources will be dissipated and spread too thinly. The Department is requested to re-examine this approach and consider its potentially adverse economic implications for the region.

A conspicuous deficit within the draft RDS is the absence of an urban policy as a counterpoint and balance to the strong rural policy within the document. An urban policy is considered essential to enable the key urban centres to develop coherent strategies at development plan level to spearhead regeneration, sustainable transport and a compelling quality of life agenda for the continued development of our towns and cities.

As suggested above, the RDS needs to carefully manage the tensions between urban and rural and needs to recognise that we are all in this together. A rising tide lifts all boats and the extent of Belfast's contribution to the GVA of the whole of Northern Ireland needs to be fully understood.

A specific recognition is requested within the RDS of the importance of the 'Centre City Zone' as articulated in the Belfast City Masterplan as the primary economic space in the region. Spatially this is the engine of the region's economy and bespoke strategic policies are required to ensure that this performs its role.

Belfast's rate base is in decline due to its falling population. This will have serious implications for the ability of the city to deal with cohesion issues and maintain its performance as the regional driver.

There is a general concern that the strategy is not sufficiently robust to address strategic issues relating to housing and employment growth. These will be critical elements for future development plans which will be undertaken by new planning authorities under the review of public administration (RPA).

The Council is strongly opposed to the retention of Sprucefield as a regional shopping centre within the strategy. This policy position is inconsistent with the role and performance identified for the leading urban centres.

More effective policies for managed housing growth are needed in order to grow the city's population and ensure the right house type is provided in the right location. These measures should ensure an urban bias by managing the release of any greenfield sites and potentially damaging levels of over zoning which would impact negatively on urban areas and infrastructure.

A strategy to ensure priority is given to the reuse of brownfield land should be outlined in more detail. This strategy should recognise disparities in the levels of previously developed land between council areas and, in conjunction with improved housing policies, ensure that sites are released in a way that supports sustainable patterns of development.

The RDS should include a more detailed policy that will enable the identification and protection of strategic employment sites. This should focus on bringing forward sites in the most appropriate locations, particularly where access to public transport and other infrastructure is available.

PURPOSE OF SUBMISSION

This document is a submission from Belfast City Council to the Department for Regional Development in connection with the consultation on the '10 Year Review of *'Shaping our future, Regional Development Strategy 2025'*. It has been prepared to provide the Department with the views of Belfast City Council and provide a strategic contribution to assist the department in the review process, particularly in light of the current work being undertaken in the 2011 review of the Belfast City Masterplan.

The Belfast City Masterplan sets out the Council's strategic planning and regeneration framework. It was first completed in 2004 to formulate the city's response to BMAP and to set out a strategy to support economic competitiveness until 2020. It is presently undergoing review and this representation reflects the key regional planning issues emerging from that process.

The response is set out in two parts, the first dealing with strategic issues and the second dealing with the more specific responses gathered from Council departments and external stakeholders.

1.0 PART ONE GENERAL / STRATEGIC POLICY RESPONSE

1.1 The Review of the Belfast City Masterplan

The Belfast City Masterplan was completed in 2004 and has informed the Council's position across a range of planning, regeneration and transport policy issues since then. However, the context for the Masterplan and RDS has changed significantly since 2004 in terms of the overall economic positioning of the city, from the accelerated period of investment and development that peaked in 2008/9 to the more recent impact of the global recession and economic downturn.

Significant work has also been carried out by the Council in advancing aspects of the masterplan strategy in terms of tourism, regeneration and community development initiatives. Central government departments have also supported the continued development of the city via public realm and streetscape improvements, the five strategic regeneration frameworks and a range of new transportation initiatives. Major private sector projects such as the Titanic Quarter, Victoria Square and D5 have come on stream, areas such as the Cathedral Quarter have matured and Belfast as an international tourism destination has been firmly established. Progress at neighbourhood level however, in terms of targeting areas of significant disadvantage with localised initiatives has been mixed.

The changed context arising from the impacts of the global recession and the legacy issues associated with this, needs to be understood and addressed in order to plan Belfast's future as a sustainable and liveable city. The 2011 review of the Belfast City Masterplan is considering these issues and the detailed background and context is set out in the following reports

- Belfast flow of people, skills, spending and investment (Autumn 09)
- Belfast Economic Performance Full Annual Report and Forecasts (October 2010)
- Research into the competitiveness of Belfast Draft report (October 2010)

These reports form the primary evidence baseline for the city's response to the RDS consultation.

Current threats to the economy should also be considered in the context of longer term trends affecting cities and the wider demographic structure including continued industrial decline, changing economic priorities, an increasingly aging population as well as the threats to our environment posed by climate change.

1.2 Emerging Themes

The Belfast City Masterplan retains as its central philosophy the core city principle. That is that as the primary economic engine of the region, a performing core city is an essential component for sustaining wider regional economic well being; by implication an underperforming core city will have the opposite effect, stalling regional growth and potentially stagnating recovery.

The 2011 masterplan is currently reviewing the key issues of economic competitiveness that Belfast has to address in order to perform its core city role. The changed economic context is recognised in that economic recovery will be slow and that investment resources in all sectors will be scarce. However, the priority of developing a strong and growing core city remains the masterplan's primary focus, and a number of emerging themes, relevant to the Regional Development Strategy, will be advanced to help Belfast achieve this;

- Continue to develop the role of the city as a economic driver and location of future employment that support regional economic prosperity
- Recognise the importance of the centre city zone, stretching from the university area to the harbour estate, as the prime economic space in Northern Ireland
- Enhance connectivity and accessibility within and to the centre city, particularly where this improves access to jobs, education and training opportunities
- Grow the population, attract new residents and support the improvement of environmental quality including air quality, public realm enhancements and access to shared open space
- Develop a competitive local carbon economy, with associated opportunities for job creation
- Maximise the use and potential benefits of infrastructure including existing resources and underused land and buildings
- Enhance the potential of natural assets and open space, including the provision of strategic connections, to deliver a range of benefits to health and wellbeing, wildlife protection, flood risk management and capacity for sustainable modes of transport.

1.3 Priorities

In the light of the realism of the reduced resources evident in the recent draft Executive budget, a number of policy and project priorities are beginning to emerge for the city. These priorities have emerged from the early stages of the review which has looked at range of interventions best capable of strengthening the core city function and wider growth aspirations whilst supporting the associated themes as set out above.

- Population Growth – Arresting the longer term population decline of the city and supporting local neighbourhood regeneration
- The Retail and Cultural offer of the Core - The importance of sustaining the regeneration of the core with strategic interventions such as the Royal Exchange project and other initiatives that address central city vibrancy, dereliction and vacancy
- North Foreshore – A prime strategic asset for the city and wider region to support the development of employment use

- Continued redevelopment and structural change in the economy through the regeneration of Titanic Quarter - its importance for finance and business services and prioritising its connection within the city and beyond
- Enhanced mobility and the importance of new rapid transit and sustainable transport initiatives to link neighbourhoods to opportunity across the city
- Support for sustainable regeneration through a new 'Learning City' concept, maximising the positive impacts of the new UU Campus and platforming the city as a centre for learning and student living
- Gateway regeneration projects that can assist in revitalising and transforming neighbourhoods as strategic interventions (e.g. Shaftsbury Square, Girdwood, Lower Newtownards Road / Bridge End and the Stadia projects at Andersonstown Gateway and Windsor Park)

1.4 The role of the RDS - Economic support for core in recognition of wider benefit

The emerging themes of the 2011 Belfast Masterplan provide a basis for understanding the suitability or otherwise of the policy direction contained within the RDS as it relates to Belfast's role as the driver for regional economic growth. To support growth it is critical that the RDS informs future infrastructure decisions and the location of future growth in the context of limited resources and need to maximise investment.

As a statutory document provided for by The Strategic Planning (Northern Ireland) Order 1999, the RDS has a strategic planning role setting the framework for development plans. Development plans must be in 'general conformity' with it and as a result it has a critical role aligning the work of the new planning authorities that will emerge under RPA. Within this context and in order to anticipate and resolve the competing demands of these new planning authorities, the RDS needs to deal appropriately with issues of a strategic nature affecting one or more council areas. There is a general concern that this draft document does not do this adequately.

The RDS must also be written to enable effective policy delivery and the means of implementing any particular policy should be made clear. The RDS should state whether its policies:

- are strategic development control policies which could affect decisions directly through the grant and refusal of planning permission;
- or whether its policies should be delivered through the Development Plan.

Whilst the RDS should not necessarily identify specific sites in detail for strategic development, it should establish the locational criteria appropriate to regionally or subregionally significant housing, business, employment, retail and leisure uses as well as the location of potential major new inward investment sites.

The success of the RDS will be determined by the extent to which its policies and actions are fully implemented. As a general comment, the Council requests the inclusion of more specific and measurable guidance, to enable the future assessment of both the RDS and development plans in terms of their general conformity with the strategy.

1.5 RDS response

Based on the role that RDS should play at the strategic spatial planning level and strategic policy direction required to implement policies at the local level within the city, the Council's response comments on the following areas within the RDS consultation draft:

- The current proposal that the preferred strategy would be to promote development in Belfast and Derry and in identified clusters with key settlements, in terms of the potentially adverse consequences of this polycentric model for regional economic growth.
- The need for a stronger **urban policy** so that Belfast can fulfil its role as an economic driver for the region, efficient use is made of **existing infrastructure** and areas where there is a clear requirement for **regeneration need** are continually improved
- The need for more effective policies to **grow the city's population**
- Additional clarity in relation to under used and **brownfield land** along with a strategy to ensure its reuse
- The need for more effective policies to identify **strategic employment sites** within the region and help deliver improvements to transport infrastructure

1.6 Proposed Growth Model

The preferred strategy outlined in the Draft RDS is 'to promote development in Belfast and Londonderry and in identified clusters with key settlements'. This is essentially a dispersal strategy based on a polycentric (multiple centres) model. This preferred strategy is presented as the best means of achieving 'balanced regional development' across the north, aiming to ensure that economic growth reaches all areas. The emphasis should focus on measures to develop the role of the city as a economic driver and location of future employment that support regional economic prosperity.

Balanced regional development is a very appropriate objective of the RDS but there must be considerable doubt as to whether the preferred strategy of the RDS is the best way to achieve this. Polycentric growth models rarely work well in terms of galvanising economic recovery and tend only to succeed in circumstances of strong and sustained economic growth where there is ample investment and capital resources competing to be accommodated. The opposite is the case in Northern Ireland at present where the recent NI Executive budget predicts a flatline performance for the NI economy at best over the coming years amid a period of sustained austerity in public finances. Under these challenging economic circumstances it is difficult to reconcile how the Draft RDS can propose that this polycentric approach to development is the best way to plan for a sustained regional recovery.

This preferred strategy would appear to sit uncomfortably alongside the central objective of sustaining Belfast as the regional economic driver and core city. In an era where resources are finite and there is only so much economic energy to apportion, the draft strategy is likely only to dim the economic performance of the regional engine and in so doing limit the real positive contribution the city already makes to balanced growth across Northern Ireland. (The current proposals in draft Planning Policy Statements 23 and 24 would deepen this concern in the absence of a clear regional dimension that recognises the broader contribution of the city and metropolitan area to the development of the wider region.)

Belfast City Council would therefore be concerned that the preferred strategy somewhat conflicts with the core city model and threatens the performance of Belfast as the regional engine leading recovery. As the international economic environment changes, cities cannot be complacent about past success (Centre for Cities/ NESTA *UK Cities in the Global Economy*) and the preferred strategy fails to acknowledge the agglomeration benefits as well as the city's economy diversity and dynamism which are sources of significant economic advantage. A policy focus on Belfast would deliver a higher return on investment and address much of the economic needs of wider region. Growth in Belfast would benefit the city's wide functional (travel to work) area which covers an area approximately 2,690 square kilometres, stretching from Larne and Antrim in the North to Downpatrick and Newcastle in the south and from the Ards Peninsula westwards beyond Lisburn. In 2003 this area had an estimated population of approximately 855,000, which represented 50% of the total population of Northern Ireland¹.

A more appropriate balance could perhaps be struck by framing a preferred strategy around the need to maximise the efficiency of infrastructure investment within existing urban centres through a clear urban policy that would identify areas such as Belfast, Lisburn, Derry and Newry where the capacity exists to harness regional growth that can deliver the critical mass without the need for substantive additional infrastructure investment. The key instrument needed to deliver a strategy such as this is the inclusion within the RDS of an appropriate urban policy and recognition of the potential for these areas to drive future growth for the region.

1.7 An Urban policy

The masterplan's development strategy is based on the core cities concept which articulates wider trends affecting cities and the need for strong urban policies to respond to issues of long term decline. More importantly, the work done to date by the Centre for Cities and other research organisations has developed empirical evidence underlining the economic importance of cities and their role in driving regional economies.

The core city analysis and recommendations provides justification for an identified space for cities within the policy framework and establishes the need for clear urban policies supportive of dynamic cities which is a prerequisite for regional growth. The importance of Belfast within the regional economy necessitates that support for its role should be central concern of the Regional Development Strategy. Belfast's past progress and performance within the wider region, in the context of extant RDS, has informed the Council's view on future policy approach and where policies need to be improved and policy emphasis changed. In view of these trends, particularly in relation to housing growth, it is considered a significant weakness of the current draft RDS that it does not contain an *urban* policy to balance with its rural policy position.

Whilst some strategic guidance within the draft RDS (SG5) acknowledges Belfast's role as the regional capital and focus of administration, commerce, specialised services and cultural amenities, a number of policy gaps could serve to act against the city fulfilling this role. Not only should SG5 be extended to include strategic sports and leisure facilities as well as retail provision, the ability of Belfast City Council to fulfil its role under SG5 is hampered by the absence of clear strategic guidance on the issues such as the status and role of Sprucefield Shopping Centre.

¹ Northern Ireland Housing Markets Areas, (NIHE / Newhaven Research, April 2010)

Belfast City Council considers that it is essential that the RDS gives clear strategic guidance that protects and enhances the function of city centres. In response to the specific question '*Do you agree that Sprucefield should continue to be classified as a regional out of town shopping centre?*', Belfast City Council emphatically responds that it does not agree and considers it essential that the RDS removes its status as a regional shopping centre.

Removing its status as a regional shopping centre, would remove the threat to Lisburn and other centres as well as supporting the remaining and appropriately designated regional shopping centres of Belfast and Londonderry. This approach is justified on the basis that the original designation was given during markedly different circumstances and was intended to provide a differentiated form of provision from that in the existing urban centres. The changed context and clear recognition of the need to support urban centres means that this status is no longer warranted, as its retention would only provide grounds for continuing ill conceived speculative development on a scale amounting to 1.5 times the size of Lisburn City Centre and half the size of Belfast City Centre. Under any strategic assessment this type of proposal is anti-urban, inherently unsustainable and potentially hugely damaging to the leadership role of our main cities that seeks to justify a regional designation purely by the quantum of retail development area.

1.8 Growing the City

Belfast, up until recently, lost population at a faster rate than almost any other major UK city and is one of the 10 slowest-growing cities by population (Centre for Cities, 2010). The RDS highlights related trends, namely the uneven distribution of population growth with 71% of growth taking place in rural areas (2001-08). It is clear that the previous RDS was unsuccessful in directing the growth in population towards major urban areas, with the lowest increases in population taking place in the Belfast and Castlereagh Council areas (See RDS Diagram 2.1 and 2.2). Without urban policy support, the population of Belfast could fall further over the next 2 decades. This underlines the extent of the challenge ahead and the potentially adverse implications for continued infrastructure maintenance and regional sustainability.

Population is a measure of success for Belfast and indeed other cities across the UK as it is the one of the primary means of leveraging sustained investment in urban areas by gaining efficiencies as a result of the reuse of existing infrastructure and services as well as previously developed land and buildings. Locating housing in close proximity to employment opportunities can also help to reduce traffic congestion and improve air quality (Net commuting into Belfast is forecast to increase by over 30,000 persons in the next 30 years). Growing the city remains a central objective for Belfast and population decline needs to be reversed to so that the continued growth of the wider region is supported. Belfast City Council therefore supports strategic guidance SG4 to grow the population of the City of Belfast.

The Council would also endorse the emphasis on managing housing growth to ensure that there continues to be a focus on developing more housing within existing urban areas. Providing a wide variety of house types for those wishing to live and work in the city is of strategic importance given the 22,000 additional jobs could be created within the city between 2008 and 2028.

Whilst some progress toward stabilising population loss and meeting demand for housing within the city centre has been achieved, the current fragility in the economy raises questions the sustainability of type of development promoted in the past. The current market for apartments with falling prices, low demand and high vacancy rates is an example of this

and there is a need to understand the dynamics of the underlying housing market. This will help to provide the right type of homes in appropriate location, having considered access to employment opportunities, social infrastructure and the need to reduce traffic congestion.

1.9 Housing Growth Indicators

The location of housing growth is an important element of any strategy to deliver urban renaissance. The appropriate supply and phasing of development land for housing also provides a clear a framework for infrastructure provision that is essential for sustainable communities including the provision of schools, health services and other facilities.

The Council notes that a new approach to housing indicators has been incorporated within the RDS. The purpose of the housing growth indicators² is to guide the distribution of housing within the region. In its approach to deriving the housing allocations, it is considered that a trends based approach is inappropriate. This approach reflects a unique period of instability in relation to urban areas in NI and its continuation will undermine the capacity of the RDS to deal with unsustainable and dispersed housing development. Moreover, these allocations should be linked to the sequential approach by reflecting significant levels of brownfield capacity and potential for sustainable urban growth across the region.

The Housing Growth Indicators are not considered a rigid framework but as guidelines for local planning. The Council would also like to raise concerns with regard to the possible implications this level of discretion will have for urban areas. In doing so it acknowledges that the current approach to HGIs is consistent with the recommendation of the Independent Panel which endorsed the Department's approach that the RDS should drive housing allocations across the Region. However, in the context of the examination the panel also recommended that over zoning should not exceed the exceptional 10% contained in policy HOU 1.1 of the extant RDS. As there is no corresponding policy within the consultation draft, a policy controlling over zoning should be considered for inclusion within the RDS. An absence of control is contrary to the overall aims of the RDS, particularly in terms of likely significant adverse affects on urban areas. As well as target housing figures provided, specific and measureable policy controls to this effect should be included. More effective policy controls will also enable the assessment of development plans in terms of their general conformity with RDS and sustainability.

1.10 Future adjustments to Housing Growth Indicators

The consultation draft also states that 'Councils will be able to use the Housing Growth Indicators as baselines or starting points which can subsequently be adjusted in the light of the 'Housing Market Analysis' for their area, which will help to develop a comprehensive evidence base to inform decisions about the policies required in housing strategies and the development of area plans. Housing Market Analysis will be completed as part of the housing market assessments which are detailed in Appendix I of the RDS. Its role will be to identify need as well as provide a solid evidence base on which available land can be allocated to housing.

These assessments will take a broader approach to assessing housing need and demand and will be based on housing market areas; geographical areas defined by household demand and preferences for housing, reflecting key functional linkages between places where people live and work. As a result it is possible that future HGIs may be provided on a sub regional rather than district basis which in turn is likely to require joint working with neighbouring councils across the region and links to the infrastructure capacity (economic, social and physical).

² the indicators for 2008-2025 are derived from HGI figures (1998-2015) published in June 2006, which were agreed by an Independent Panel which conducted a Public Examination in 2006.

As future housing markets assessments will influence the overall allocation of housing numbers, their importance should be highlighted more effectively within RDS. This should be set out in the main strategy along with additional detail concerning the implications for development plans and joint working.

At a later stage, once the housing market areas have been agreed and assessments complete, an update to the district level of housing provision may be required. The RDS should clarify whether an update would trigger a review to the RDS and should provide additional detail on how these revised figures should be implemented.

1.11 Brownfield land

Belfast and its role as a place to live in the context of its proximity to existing and future jobs provision in the region is a regional planning issue. Urban areas of this size should be considered as a strategic location for new housing because matching employment and housing growth will be an important means to support infrastructure, reduce traffic congestion, improve air quality and reduce green house gas emissions.

Developing a strategy for the re use of brownfield land will be integral to achieving targets for housing growth and should underpin a policy for the revival of our urban areas and achieving more sustainable patterns of development. Bringing forward brownfield land for development will depend on market demand and effective controls over the release of greenfield land outside the urban areas. Appropriate constraints on new allocations and measures to support a phased approach to the release of land elsewhere will be increasingly important in the context of the overall reduction in demand within the economy. This reiterates the need for the RDS to provide a strong framework for development plans, including a controlled approach to scale and location of new housing development that encourages regeneration of urban areas and utilises or supports existing infrastructure and services.

For the purposes of providing a consistent framework for the development of brownfield land, the RDS should clarify the definition of brownfield sites. The council would also raise a concern over the blanket application of the 60% target and definition of urban areas as constituting towns of over 5,000 population. There are likely to be major disparities in the levels of previously developed land between council areas and a mechanism should be introduced to ensure that sites are released in a way that supports sustainable patterns of development. Over provision and early release of land in one area to the detriment of brownfield re use and urban renaissance in another should be avoided.

The monitoring of land use change should take place at a more detailed level as identified in 'Shaping Our Future - Implementation and Monitoring of the Regional Development Strategy for Northern Ireland 2025' (2003). This report identified the need for a Northern Ireland Land Use Database so that accurate data capturing the dynamics of land use and development across the region could be collected and shared. This would permit the orderly management and release of land and infrastructure provision.

1.12 Employment

In contrast to housing growth, Belfast is one of the ten cities with highest employment growth (Centre for Cities, 2010) and it is expected that over the period to 2028 almost half of all the region's net new jobs are expected to be created in the four City Councils of Belfast, Derry, Lisburn and Newry. In Belfast, it is estimated that 22,000 jobs could be created between 2008 and 2028 with the financial and business service sectors driving growth.

The Council will support the creation of new employment opportunities and the objective of ensuring that sufficient land is made available to accommodate these jobs. To do so it will

support the identified business sectors and provision for a supply of employment land within the Belfast area to ensure that sustainable economic development is not constrained.

The Council agrees that key locations should be identified and protected for economic growth, which will strengthen the role of the Metropolitan Area as the regional economic driver. It reiterates support for the following major employment/industrial locations including those within Belfast:

- Belfast Harbour Area, (including Titanic Quarter),
- the North Foreshore,
- Crumlin Road Gaol.

Given that the city centre rate base is falling for the first time in 15 years, Belfast City Council also wishes to highlight the importance of sequential approach for major new office development and the city centre as the priority location of given its existing public transport provision and accessibility. However, in recognition of Belfast's significant 3rd level educational capacity and potential for innovation, exceptions should be made for regionally significant knowledge-based services may also be clustered close to universities, major hospitals or other research establishments.

Whilst it is anticipated that the regeneration of TQ will continue as the residential, commercial and leisure potential of lands are realised, measures to improve connectivity with the city centre should be integrated and prioritised as a consideration for all strategic proposals. Enhancing improvements in connectivity to these areas will significantly enhance the benefits to regeneration and ensure that these areas play a role that is complementary to the existing urban centre.

It should be noted that the strategic employment sites of TQ and North Foreshore have the potential for 13,000 net additional jobs over the next 20 years. The RDS should support the implementation of sustainable transport measures to reduce levels of commuting and congestion and focus on the necessity for economic corridors to be based on and support existing infrastructure.

Table 5.2 of the RDS provides a framework to enable Planning Authorities to identify robust and defensible portfolios of both strategic and locally important employment sites in their development plans, however it does not give guidance on the criteria that strategic employment sites should fulfil. Analysis carried out by Oxford Economics suggests that quality rather than quantity may be an issue, with 2,000 ha of employment land for the region up to 2028 against an estimated need for 450 ha.

There is a need to understand the quality of supply, particularly at the locations identified for the majority of jobs growth. In addition to this framework, a set of criteria should be included that defines strategic or regionally significant employment locations (i.e. a limited number of sites which will have a significant role to play in the growth of the regional economy, as a result of the type of development accommodated (key growth sectors, knowledge nuclei, inward investment and headquarters functions) and the location of the sites). The criteria may include sites/ locations that are;

- capable of development within the plan period, having regard to the condition and availability of the land, infrastructure capacity, market considerations and environmental capacity;
- highly accessible, especially by adequate public transport services, walking and cycling;
- well-related to areas with high levels of worklessness and/or areas in need of regeneration; and
- well related to neighbouring uses, particularly in terms of access, traffic generation, noise and pollution.

Summary of strategic issues for the review:

The preferred RDS strategy based on a polycentric growth model is inappropriate for the current economic climate and threatens to undermine the longer term performance of the regional engine, centred on the Belfast Metropolitan area, and other key urban centres. The development strategy should focus on centres that have established urban capacity and that can optimise the utilisation of committed infrastructure investment thereby maximising the potential for sustainable balanced development. The implications of the current preferred strategy risks reducing the potential for even modest economic recovery as scarce resources will be dissipated and spread too thinly. The Department is requested to re-examine this approach and consider its potentially adverse economic implications for the region.

A conspicuous deficit within the draft RDS is the absence of an urban policy as a counterpoint and balance to the strong rural policy within the document. An urban policy is considered essential to enable the key urban centres to develop coherent strategies at development plan level to spearhead regeneration, sustainable transport and a compelling quality of life agenda for the continued development of our towns and cities.

As suggested above, the RDS needs to carefully manage the tensions between urban and rural and needs to recognise that we are all in this together. A rising tide lifts all boats and the extent of Belfast's contribution to the GVA of the whole of Northern Ireland needs to be fully understood.

A specific recognition is requested within the RDS of the importance of the 'Centre City Zone' as articulated in the Belfast City Masterplan as the primary economic space in the region. Spatially this is the engine of the region's economy and bespoke strategic policies are required to ensure that this performs its role.

Belfast's rate base is in decline due to its falling population. This will have serious implications for the ability of the city to deal with cohesion issues and maintain its performance as the regional driver.

There is a general concern that the strategy is not sufficiently robust to address strategic issues relating to housing and employment growth. These will be critical elements for future development plans which will be undertaken by new planning authorities under the review of public administration (RPA).

The Council is strongly opposed to the retention of Sprucefield as a regional shopping centre within the strategy. This policy position is inconsistent with the role and performance identified for the leading urban centres.

More effective policies for managed housing growth are needed in order to grow the city's population and ensure the right house type is provided in the right location. These measures should ensure an urban bias by managing the release of any greenfield sites and potentially damaging levels of over zoning which would impact negatively on urban areas and infrastructure.

A strategy to ensure priority is given to the reuse of brownfield land should be outlined in more detail. This strategy should recognise disparities in the levels of previously developed land between council areas and, in conjunction with improved housing policies, ensure that sites are released in a way that supports sustainable patterns of development.

The RDS should include a more detailed policy that will enable the identification and protection of strategic employment sites. This should focus on bringing forward sites in the most appropriate locations, particularly where access to public transport and other infrastructure is available.

2.0 PART TWO: SPECIFIC RESPONSE

This section deals with responses collated from Council departments to specific issues raised in the draft RDS document. Responses relate to specific questions posed in the review.

Q1 Have we identified the most significant factors impacting on the Region? If not, what should be omitted and/or what should be added?

SG1 To promote urban economic development at key locations throughout the BMUA and ensure that sufficient land is available for job creation

It would be useful for the NFS Giant's Park site to be identified and protected for economic development and employment creation. The proposed regeneration plan has the potential to generate over £300million of private sector investment, 1,000,000 sq ft of commercial accommodation, and create c800 new jobs for Belfast. I would agree with the RDS that significant investment is required to grow and sustain the BMUA, but it needs to recognise that public sector investment in infrastructure to attract private sector investment and development is crucial to secure its strategic policy. I note that NFS Giant's Park is not mentioned on Page 76, as a key location to be protected for economic growth / significant regeneration site (340 acres) (for comparison Titanic Quarter is c 185 acres) in the RDS, unless the site is being defined as part of the Belfast Harbour Area. It would be good to clearly identify NFS Giant's Park as a significant regeneration project for industrial commercial uses that can benefit the BMUA in its own right and provide new employment opportunities for the community in Belfast.

It will be important for the RDS to provide the planning link to the BMAP and any other local statutory plans for Belfast to facilitate land use zoning of sites for economic development, and to provide clarity for the Development Control decision making process. It would also help to provide clarity for investment decision makers to avoid a protracted planning process and provide confidence that there will be public investment in the infrastructure to reduce development risk.

The Council considers that the following issues are important in shaping the strategic direction for the new RDS:

1. A new emphasis on how to reduce dependence on the car and change travel behaviour
2. The importance in all aspects of forward planning to address the consequences of climate change; this means an even greater focus on where people live and work and how transport and energy needs are planned

Within Northern Ireland, Part III of the Environment (Northern Ireland) Order 2002 places a duty upon local authorities to undertake periodically to undertake a review and assessment of air quality within its area in order to determine compliance with UK air quality objectives and EU limit values. Where the local authority determines that an air quality standard or objective is unlikely to be met by a compliance date, it is required to designate an air quality management area (AQMA), undertake a more detailed assessment of the pollutant in question and prepare an air quality action plan which draws together local authority and competent authority actions. The Air Quality Regulations (Northern Ireland) 2003 designates a series of competent authorities which includes Northern Ireland central government departments, their agencies and district councils and establishes the air quality objectives and target dates.

Local District Councils under their responsibilities are charged with measuring and evaluating the state of air quality at regular intervals and through source apportionment studies have identified that the exceeding pollutants in Northern Ireland are principally attributed to road transport.

The change to a car dependent city is mirrored in population loss from Belfast, initially to adjacent suburbs but over the last two decades increasingly to a surrounding ring of dormitory towns and villages as discussed in paragraph 2.43 of the Strategy. Existing transport arrangements in Northern Ireland have resulted in such levels of car dependency that to realistically reduce these levels a major significant investment in modal shift from the use of the private car to public transport particularly for major commuter traffic arterial routes into Belfast is needed. This will require further major economic investment into public transport systems by the DRD and possible incentives to discourage less sustainable forms of travel.

The Council supports the strategy aims and would stress that this is an opportunity to make the link between air pollution, climate change effects and public health – a real driver to influence behaviour change. These changes are necessary to achieve a significant reduction in both CO₂ and NO₂ concentrations throughout Northern Ireland.

Air pollution causes a significant and often overlooked risk to public health, with more than 35,000 premature deaths occurring annually and, in the worst affected areas, a nine-year reduction in life expectancy. At the same time, action on air pollution is an effective and important weapon in the fight against climate change. Bringing the two together has enormous potential, building a real and current driver in the shape of a public health message into a Strategy with positive air quality and climate change outcomes. This will help promote and galvanise behaviour change.

One of the greatest challenges facing all the relevant organisations will be to work collaboratively and seriously consider what changes are needed to make significant improvements in air quality and climate change in order to protect people's health in Northern Ireland. The revised RDS needs to place emphasis on this and provide a framework and guidance for this to happen.

The Council also supports the approach whereby waste is highlighted as a significant factor impacting on the region. Waste is increasingly being viewed as a utility and wherever there is development, there will be waste production. Based on the proximity principle, provision should be made for waste production as with other utilities such as gas, water and electricity.

Within the paper it states that if current rates of waste production continue (1 million tonnes of municipal waste produced annually), municipal waste arisings will increase by almost 50% by 2020. This seems to be contradictory to our current understanding of waste growth and to a statement made later in the document, which states: "The North currently produces some one million tonnes of municipal waste annually, and this figure has grown by 2.5% between 2004 and 2008. This has decreased by 3.3% between 2008 and 2009". Whilst both statements agree that there is 1 million tonnes of waste produced annually, if the 2.5% annual growth rate is applied to 1 million tonnes (in 2010) and projected to 2020, this would result in a growth of approximately 280,000 tonnes. This appears to represent an increase of 28% by 2020, rather than 50%. In addition given that the last few years have witnessed decreases of 3% on average then the 2.5% growth rate would seem somewhat on the high side which would result in a percentage figure considerably less than 28%.

In section 2.2 one of the bullet points highlights that need to address the consequences of climate change. The Council would highlight that one positive way of combating climate change is to increase the planting of trees in both rural and urban areas which should include street trees. The RDS should support the provision and maintenance of the tree stock with an emphasis on the importance within urban areas including the greater Belfast area.

Q2 Do you agree with the aims of the RDS? If not, what would you change and why?

The RDS supports 'strong sustainable growth for the benefit of all parts of the region' and 'strengthening Belfast as an economic driver'. As set out within Part 1 of this submission, the fragile economic circumstances will significantly undermine the capacity for strong sustainable growth in all parts of the region. Rather than pursuing a polycentric development model, growth should be prioritised in key locations where the potential for creating additional employment opportunities is greatest.

The aims of the RDS should also recognise the adverse trends affecting urban areas; namely population decline. Continued dispersal of the population is unsustainable when the majority of employment opportunities are located in urban areas. This has created significant public health and environmental issues arising from increased levels of commuting. The RDS aims should recognise the overarching need to manage housing growth sustainably.

The RDS aims also refer to 'improving connectivity and enhancing movement', in the context of supporting the network of towns and their associated hinterlands. The RDS should also refer to the importance of linkages to key employment locations and of the delivery of sustainable transport solutions for Belfast.

The Council supports the aim to promote development which improves the health and well-being of communities.

Promoting development which improves the health and well-being of communities is essential in ensuring accessible, safe, sustainable and connected development of Belfast. In Belfast, as in other cities, health and illness follow the social gradient; the lower the socio-economic position the worse the health. The health gap and the general health of the population of Belfast are worse than many other UK cities.

The Belfast Health Development unit was jointly established by the Council, Public Health Agency and Belfast Trust as a central hub to maximise the resource and impact to improve health and well-being in the city. Initial priorities for the unit include developing effective action with those communities and disadvantaged neighbourhoods experiencing the sharpest inequalities in health, physical activity and obesity, alcohol misuse, developing a strategic and co-ordinated approach to mental health and emotional wellbeing in Belfast and developing integrated approaches to delivering sustainable health & wellbeing outcomes for children & young people, older people and black & minority ethnic groups.

The development of a city wide health plan is a key element in taking forward and testing the Council's emerging community planning process. The action plan presents an opportunity to give fresh impetus to priorities which have been developed over many years in response to community needs identified by communities

throughout the Belfast City Council Area. It also provides an opportunity to test new approaches to collaborative achievement of the strategic priorities.

The RDS should support the principle of strategic partnerships and cooperation between agencies / stakeholders to set the future strategic direction for developing plans to tackle health inequalities and improving the health of the people of Belfast and across the region. The successful integration of community planning with development planning should be a consideration for the Regional Development Strategy. The delivery of effective spatial planning requires a commitment to partnership and cooperation that should be established in the Regional Development Strategy and monitored as part of the future strategy management.

The vision makes reference to the fact that there should be 'a region of opportunity where people enjoy living and working in a healthy environment'. The support of the biodiversity of the region is critical for the RDS as the natural environment within urban areas contributes greatly to a 'feel good' factor as well as creating natural green corridors linking our parks and open spaces.

Paragraph 3.5 promotes actions to reduce our carbon footprint and facilitate adaptation to climate change. *"It is recognised that climate change is one of the most serious problems facing the world. We are all contributors to global warming and need to play our part to reduce and offset our impact on the environment. Reducing harmful carbon dioxide emissions is of great importance and by reducing our carbon footprint can reduce the threat of climate change. Therefore, where it is necessary to use resources, it should be done in sustainable ways. Waste needs to be reduced, reused and recycled and everyone should contribute to reducing the Region's environmental footprint."*

The Council agrees that waste needs to be dealt with in a sustainable manner, based on the waste hierarchy, with the greatest emphasis on waste prevention and following that reduction, reuse and recycling, energy from waste, with disposal to landfill as the least favourable option. In order to achieve a realistic approach to managing our waste as sustainable as possible, recognition needs to be made for the adequate provision for waste infrastructure within our region. Given the strategic importance of waste management we cannot deliver the requirements of European Law (namely the EC Landfill Directive and Waste Framework Directive), without adequate waste infrastructure, including provision for storage, collection, reprocessing and treatment of waste.

The Council welcomes the objectives of offsetting our impact on the environment and reducing our carbon footprint and would anticipate that due cognation is given to the NI Sustainable Development Strategy.

Q3 Do you consider Alternative 4 is the most appropriate? If not what option do you consider more appropriate and why?

The preferred strategy outlined in the Draft RDS is 'to promote development in Belfast and Londonderry and in identified clusters with key settlements'. This is essentially a dispersal strategy based on a polycentric (multiple centres) model. This preferred strategy is presented as the best means of achieving 'balanced regional development' across the north, aiming to ensure that economic growth reaches all areas.

Balanced regional development is a very appropriate objective of the RDS but there must be considerable doubt as to whether the preferred strategy of the RDS is the best way to achieve this. Polycentric growth models rarely work well in terms of galvanising economic recovery and tend only to succeed in circumstances of strong and sustained economic growth where there is ample investment and capital resources competing to be accommodated. The opposite is the case in Northern Ireland at present where the recent NI Executive budget predicts a flatline performance for the NI economy at best over the coming years amid a period of sustained austerity in public finances. Under these challenging economic circumstances it is difficult to reconcile how the Draft RDS can propose that this polycentric approach to development is the best way to plan for a sustained regional recovery.

This preferred strategy would appear to sit uncomfortably alongside the central objective of sustaining Belfast as the regional economic driver and core city. In an era where resources are finite and there is only so much economic energy to apportion, the draft strategy is likely only to dim the economic performance of the regional engine and in so doing limit the real positive contribution the city already makes to balanced growth across Northern Ireland. (The current proposals in draft Planning Policy Statements 23 and 24 would deepen this concern in the absence of a clear regional dimension that recognises the broader contribution of the city and metropolitan area to the development of the wider region.)

Belfast City Council would therefore be concerned that the preferred strategy somewhat conflicts with the core city model and threatens the performance of Belfast as the regional engine leading recovery. As the international economic environment changes, cities cannot be complacent about past success (Centre for Cities/ NESTA *UK Cities in the Global Economy*) and the preferred strategy fails to acknowledge the agglomeration benefits as well as the city's economy diversity and dynamism which are sources of significant economic advantage. A policy focus on Belfast would deliver a higher return on investment and address much of the economic needs of wider region. Growth in Belfast would benefit the city's wide functional (travel to work) area which covers an area approximately 2,690 square kilometres, stretching from Larne and Antrim in the North to Downpatrick and Newcastle in the south and from the Ards Peninsula westwards beyond Lisburn. In 2003 this area had an estimated population of approximately 855,000, which represented 50% of the total population of Northern Ireland³.

A more appropriate balance could perhaps be struck by framing a preferred strategy around the need to maximise the efficiency of infrastructure investment within existing urban centres through a clear urban policy that would identify areas such as Belfast, Lisburn, Derry and Newry where the capacity exists to harness regional growth that can deliver the critical mass without the need for substantive additional infrastructure investment. The key instrument needed to deliver a strategy such as this is the inclusion within the RDS of an appropriate urban policy and recognition of the potential for these areas to drive future growth for the region.

³ Northern Ireland Housing Markets Areas, (NIHE / Newhaven Research, April 2010)

Q4 Do you think the approach as illustrated by the wheel in Diagram 4.1 is useful? If not, what alternative approach do you suggest?

The Council would suggest that Diagram 4.1 'The Hierarchy of Settlements and Related Infrastructure' would be enhanced if the 'Networks' strand included community greenways/ open space networks. Particular reference to the parks and open space networks, urban forests, biodiversity may enhance the 'environment' strand of the hierarchy.

Q5 Do you agree that Belfast as the regional economic driver of the region needs to be positioned as the regional centre for administration, commerce and specialised services? If not, why not?

The Council supports the assertion that Belfast as the regional economic driver of the region needs to be positioned as the regional centre. However it would like to suggest the widening of the functions specified, from 'administration, commerce and specialised services' to include retail, education, health, industry, employment as well as strategic sports and leisure facilities.

Q9 Do you think the concept of clustering cities and towns will enable greater economic prosperity and delivery of services? If not, why not?

The preferred strategy outlined in the Draft RDS is 'to promote development in Belfast and Londonderry and in identified clusters with key settlements'. This is essentially a dispersal strategy based on a polycentric (multiple centres) model. This preferred strategy is presented as the best means of achieving 'balanced regional development' across the north, aiming to ensure that economic growth reaches all areas.

Balanced regional development is a very appropriate objective of the RDS but there must be considerable doubt as to whether the preferred strategy of the RDS is the best way to achieve this. Polycentric growth models rarely work well in terms of galvanising economic recovery and tend only to succeed in circumstances of strong and sustained economic growth where there is ample investment and capital resources competing to be accommodated. The opposite is the case in Northern Ireland at present where the recent NI Executive budget predicts a flatline performance for the NI economy at best over the coming years amid a period of sustained austerity in public finances. Under these challenging economic circumstances it is difficult to reconcile how the Draft RDS can propose that this polycentric approach to development is the best way to plan for a sustained regional recovery.

Q12 Does the spatial framework recognise the important role of Gateways?

Q13 Do you think the concept of Economic Corridors as described is useful? If not why not?

The concept could support more sustainable growth, however, the RDS should support the implementation of sustainable transport measures to reduce levels of commuting and congestion and focus on the necessity for economic corridors to be based on and support existing infrastructure.

Q14 Do you agree with the Spatial Framework set out in this chapter. If not what alternative approach do you suggest and why?

Please refer to the response to Q3.

Q15 Do you consider that the identification of a BMUA continues to be appropriate for forward planning purposes?

The BMUA continues to be an appropriate forward planning mechanism and should not be disaggregated. It reflects the spatial influence of Belfast and recognises that the city's influence extends beyond its boundaries to a much wider area.

However, this functional area is increasingly defined in terms of commuting distances and the patterns of travel between homes and employment. The extent of this travel to work area is described by Northern Ireland Housing Markets Areas, (NIHE / Newhaven Research, April 2010). Any revision to the BMUA should reflect this widening functional area and should ensure transportation and land use is managed and coordinated appropriately.

The Council also has specific concerns in relation to waste and environmental assets.

There needs to be recognition that with any sort of planning development, such as housing, commercial or educational establishments, waste will inevitably be produced, as a result of, and as a by-product of that development. Consideration needs to be given to accommodation and access to waste, including storage facilities, and on a larger scale, amenities such as waste recycling, treatment and disposal facilities.

Within the last development plan for the metropolitan area, there was limited reference made to waste facilities. The Council has continuously stressed the need to identify appropriate locations for waste management facilities and provision of a framework which facilitates the development of these facilities as infrastructure within any local development plan.

The description of the open space network should to be expanded to include urban parks, playing fields, playgrounds, allotments, amenity open space and allotments. This classification would be in line with the Councils "Your City, Your Space" typology for open space

SG1 seeks to promote urban economic development at key locations throughout the BMUA and ensure that sufficient land is available for job creation. It would be useful for the North Foreshore Giant's Park site (340 acres) to be identified and protected for economic development and employment creation. The proposed regeneration plan has the potential to generate over £300million of private sector investment, 1,000,000 sq ft of commercial accommodation, and create c800 new jobs for Belfast. The RDS highlights that that significant investment is required to grow and sustain the BMUA, but it needs to recognise that public sector investment in infrastructure to attract private sector investment and development is crucial to secure its strategic policy. The North Foreshore NFS Giant's Park is not mentioned on Page 76, as a key location to be protected for economic growth / significant regeneration in the RDS (for comparison Titanic Quarter at approximately 185 acres is included), unless the site is being defined as part of the Belfast Harbour Area. The North Foreshore Giant's Park

should be clearly recognised as a significant regeneration project for industrial commercial uses that can benefit the BMUA in its own right and provide new employment opportunities for the local community and wider region.

It will be important for the RDS to provide the planning link to the BMAP and any other local statutory plans for the Belfast area to facilitate the allocation of sites for economic development, and to provide clarity for the Development Control decision making process. It would also help to provide clarity for investment decision makers in respect of the planning process and provide confidence that there will be public investment in the infrastructure to reduce development risk.

It is critical to Protect and enhance the quality of the setting of the BMUA and its environmental assets (SG3) as it can help to ensure that our city is attractive to its citizens, investors, and visitors. In this regard the RDS encouraging sustainable access to the natural areas, particularly creating walking and cycle networks through ecological corridors would be welcomed. This has the advantage of helping to create safe routes throughout the city for both the recreational and utility cyclist and walkers. The North Foreshore Giant's Park offers the opportunity to become part of a connected network of open spaces in the City.

The objective to *Grow the population of the City of Belfast* (SG4) is to be welcomed. However it will be important to ensure that a variety of housing needs are met i.e. public and private as well as encouraging more family housing. The RDS should support measures to reuse existing space and support mixed use such as apartments over commercial developments along the arterial routes. This could help to regenerate the key routes into the City as well as creating business sustainability, enabling with residents to use the local services on their neighbourhood.

There is an opportunity for Belfast to broaden its economy to grow the environmental technology sector to meet the emerging challenges of energy security, climate change etc. A number of Cities in the UK are diversifying their economy to develop the environmental sector to create new opportunities for investors and developers that will provide new jobs and generate wealth. London is already promoting itself as a low carbon capital - global leader of the low carbon economy. This is a relatively new concept, but it is giving these Cities an innovative competitiveness edge that is distinctive. Belfast does have strong engineering base which could be exploited to encourage and grow the environmental technology sector.

The North Foreshore Giant's Park Environmental Resource Park has the potential to attract environment technology businesses that could create significant green collar jobs for the city. The recent announcement of the development of a marine energy park within the harbour area would support this potential. The clustering of activity can be a key driver to attract further inward investment to a city. Industrial sites such North Foreshore and the Harbour provide the potential large scale space for targeting the environmental technology sector with a focus on renewable energy, resource management, R&D etc. There is an opportunity for the RDS to encourage the creation of a strong environmental cluster within the City that could be used to promote Belfast as an important regional hub for the new environmental technology sector, and support a transition to a leading regional low carbon capital city.

Q16 Do you agree that Sprucefield should continue to be classified as a regional out of town shopping centre?

In striving to achieve Belfast's regional role identified under SG5, Belfast City Council is hampered by the absence of clear strategic guidance on the issues such as the status and role of Sprucefield Shopping Centre.

Belfast City Council considers that it is essential that the RDS gives clear strategic guidance that protects and enhances the function of city centres. In response to the specific question '*Do you agree that Sprucefield should continue to be classified as a regional out of town shopping centre?*' Belfast City Council emphatically responds that it does not agree and considers it essential that the RDS removes its status as a regional shopping centre.

Removing its status as a regional shopping centre, would remove the threat to Lisburn and other centres as well as supporting the remaining and appropriately designated regional shopping centres of Belfast and Londonderry. This approach is justified on the basis that the original designation was given during markedly different circumstances and was intended to provide a differentiated form of provision from that in the existing urban centres. The changed context and clear recognition of the need to support urban centres means that this status is no longer warranted, as its retention would only provide grounds for continuing ill conceived speculative development on a scale amounting to 1.5 times the size of Lisburn City Centre and half the size of Belfast City Centre. Under any strategic assessment this type of proposal is anti-urban, inherently unsustainable and potentially hugely damaging to the leadership role of our main cities that seeks to justify a regional designation purely by the quantum of retail development area.

Q21 Does the strategic guidance address the key issues relating to climate change and clearly demonstrate what needs to be done in order to help improve the environment? If not, what suggestions can you make?

Shaping our Future 2001 asserted that the "enhancement of biodiversity will be one of the most powerful indicators of progress towards sustainability" however the Council considers that within the 10 year review the issue of biodiversity loss and restoration is not adequately addressed.

The report also stated "The natural environment directly supports all life and is essential to our well being. It provides the resources which we will need for continuing economic development but exists in a delicate balance between renewal and depletion. This strategic planning guideline sets out a range of measures to guide developers and the whole community towards achieving sustainable development patterns, conserving the environmental capital, applying the precautionary principle, enhancing biodiversity and creating a better quality of life for all" (Shaping our Future 2001).

Biodiversity provides numerous ecosystem services such as water purification, carbon storage and flood protection and the economic benefits it provides should be considered. Many of these services are under threat. A recent global study, The Economics of Ecosystems and Biodiversity (TEEB) has evaluated the economic value of biodiversity and ecosystems. By 2050 loss of biodiversity under a business as usual scenario could cost up to 7 per cent of global GDP. The study shows that the cost of sustaining biodiversity and ecosystem services is lower than the cost of allowing biodiversity and ecosystem services to decline.

Furthermore there is now a realisation that biodiversity and climate change are irrevocably interrelated. Biodiversity is the most cost-effective way of mitigating and

adapting to climate change. Investments in healthy ecosystems will be important for protection against natural events such as floods and storms.

In relation to SG16 “Reduce Our Carbon Footprint and facilitate mitigation and adaptation to climate change whilst improving air quality” the Council notes the mitigation listed in paragraph 5.38 and welcomes the inclusion of all measures but in particular:

- Adapt the existing transport network to facilitate the modal shift away from the car
- Develop strong linkages between policies for managing air pollution and climate change.

The Council would again stress that this is an opportunity to make the link between air pollution, climate change effects and public health – a real driver to influence behaviour change. These changes are necessary to achieve a significant reduction in both CO₂ and NO₂ concentrations throughout Northern Ireland.

Air pollution causes a significant and often overlooked risk to public health, with more than 35,000 premature deaths occurring annually and, in the worst affected areas, a nine-year reduction in life expectancy. At the same time, action on air pollution is an effective and important weapon in the fight against climate change. Bringing the two together has enormous potential, building a real and current driver in the shape of a public health message into a Strategy with positive air quality and climate change outcomes. This will help promote and galvanise behaviour change.

One of the greatest challenges facing all the relevant organisations will be to work collaboratively and seriously consider what changes are needed to make significant improvements in air quality and climate change in order to protect people’s health in Northern Ireland. The revised RDS needs to place emphasis on this cooperation, monitor activity and provide a positive framework and guidance for this to happen.

The greatest challenge will be to make public transport, both buses and trains an accessible, attractive alternative to less sustainable forms of transport as the preferred choice for travel throughout Northern Ireland.

In addition the concept of ecological networks with the preservation and encouragement of semi natural environments to support and enhance the biodiversity is to be welcomed under SG16. In particular the opportunity to combine ecological networks to the green networks for walking and cycling would assist the case for developing the green corridors to create attractive access routes around and through the city. The Giant’s Park public open space has the potential to be a semi natural environment that could be linked to the existing cycle route adjacent to the M2 Motorway and could form part of a potential ecological network between the Lough and Cave Hill.

As highlighted in previous sections, we would stress that appropriate and sustainable management of our waste is needed in order to contribute to minimising our carbon footprint and impact on the environment as part of SG17 Manage our Waste Sustainably SG17 Manage our Waste Sustainably. In order to achieve this, adequate recognition must be made for waste provision across the region. We would seek reference to Councils Waste Plans within the proposed strategic guidance and also request that reference to the Environment within the document incorporates the principles of Sustainable Development.

It would be useful if this section could be expanded so it is applied to the development of the region, as it is too vague. This could be critical for planners as in the next four five years there will be major planning applications submitted for new waste management facilities, so it is important for the RDS to state clearly the important need for a network of these facilities, that they can be accommodated in settlement areas if they are well designed, that they could create employment opportunities, potential benefits for energy generation etc. There needs to be a broad spatial explanation of where new waste management facilities are to be located, and how they relate to the surrounding area. The RDS should promote the concept of cluster locations for waste and recycling activities to ensure a sustainable development of facilities that can be co located, and help provide clear strategic guidance for Planners and potential Operators. Also the need for these facilities to be well designed to ensure integration and greater acceptance of the ability to accommodate such development within urban areas, as this would support the planned provision of this infrastructure over the next decade.

The RDS has in SG19 *Sustainable and secure energy supply* placed greater emphasis to the growing political concerns about energy/resource security, fuel poverty, and climate change, which will have a major influence on investment decisions and spatial planning in the next 10 years if NI is to achieve its targets. This is being driven by EU Targets, Global Completion, and the UK Climate Change Act, which are shaping the agenda for change towards a low carbon future. In the UK, the response appears to be the development of energy clusters / hubs such as. Campbelltown, West Cumbria, Newcastle, Hull for the off shore wind farms. London has plans to decentralise energy production in response to the variety of renewable energy technology, i.e. anaerobic digesters, gasification, utilise waste heat, which would be contained within energy clusters. It would be useful if this section could be expanded to provide greater clarity in respect of the strategic objectives to provide greater certainty for the development of this important infrastructure.

It is essential that the RDS clearly articulates the important need for a network of these renewable energy facilities, that they can be accommodated in settlement areas if they are well designed, that they could create job opportunities, potential benefits for energy generation etc. There needs to be a broad spatial explanation of where these could be located, and how they relate to the surrounding area. The RDS should promote the concept of cluster locations for renewable energy activities to ensure a sustainable development of facilities; and help provide clear strategic guidance to avoid a protracted planning process. The RDS could make the link between the development of renewable energy technology and the potential to support the growth and diversification of the regional economy.

Q22 Does the strategic guidance address the key issues relating to our society and clearly demonstrate what needs to be done in order to help improve how we live and work? If not, what suggestions can you make?

Sustainable development should include planning for the management of waste. We would refer to the recently published "Local Government Waste Storage Guide for Northern Ireland" and request that it is taken into account within SG22. The guide can be downloaded from

<http://www.belfastcity.gov.uk/buildingcontrol/wastestorage.asp>

The guide was developed by local government, with close consultation and collaboration with central government. It seeks to provide practical advice and guidance, to architects, developers and building contractors, to ensure that waste is properly planned for at the earliest stage of the design and build process of development and that arrangements for storing and accessing waste are properly considered when designing buildings and building developments.

Q23 Do you agree with the revised definition of “brownfield” and that there is need for a target?

The proposed definition of brownfield land is too short and simplistic. Recording the reuse of previously developed land is an essential aspect of a sustainable development strategy for a region. Only through the appropriate redevelopment of under-utilised land can a region continue to grow and develop without causing undue pressure on Greenfield land. Focussing redevelopment plans on under-used and vacant sites helps to maintain vibrant cities where people will want to work and live. The measurement of the re-use of this land is essential in order to ensure that strategic policies, actions and guidance are effective and appropriate. A Northern Ireland Land Use Database is required so that accurate data on the dynamics of land use and development across the region can be collected and shared.

Consequently, the defining of the term ‘brownfield’ and the setting of targets for its redevelopment is paramount. Much documented research as to how to define brownfield sites has been conducted and none would appear as simplistic as purely “land and buildings which have an industrial or commercial use.” It is unclear as to whether this could also include land currently being constructively utilised. Whilst it is important to ensure that the definition does not unintentionally include land that would not be considered truly ‘brownfield’ (such as back gardens and open space), it is important to accurately capture and address all lands that are under-utilised and offer the potential for redevelopment.

A clear urban policy for the Regional Development Strategy should address the definition and application of targets for all urban areas across the region. For Belfast, the Council would propose the adoption of CABERNET’s fundamental definition with additional Belfast specific matters and define it as:

- Land that is or was occupied by a permanent structure and is now derelict, vacant or under-used (excluding public open spaces and parks);
- Land that has been affected by former uses of the site or the surrounding land;
- Land that is mainly in fully or partly existing developed areas of Belfast;
- Land that requires some form of intervention to bring it back into beneficial use; and
- Land that has real or perceived contamination problems.

The RDS should also consider ways in which it can facilitate or support the intervention often required to bring these sites back into beneficial use including the positive collaboration between agencies. Without the effective encouragement of the re-use of land, particularly problematic sites will always remain under-used. Any allotted redevelopment target will be jeopardised in the future as the ‘easier’ sites are redeveloped and utilised. A strong urban policy should support the re-use of these sites as assets that can contribute to the continued regeneration of the settlements across the region.

Although central government policy is clear on re-use of this land, local Northern Ireland specific legislation and guidance remains lacking. Belfast City Council has therefore tasked itself with producing a Belfast-specific Technical Guidance Note for the safe and appropriate re-use of brownfield lands for developers and their consultants. Supporting such Council driven initiatives would greatly assist in the region's redevelopment, as would encouraging and monitoring such a sector-wide collaborative approach to brownfield redevelopment. Across Northern Ireland and within the many disciplines involved in brownfield redevelopment the ability exists to collectively support the regeneration of this land for safe and sustainable development including residential use.

The Council would also welcome a mechanism to allow previously used land to be deemed suitable for waste management purposes. This could help to progress the development of waste management infrastructure within Northern Ireland.

Q24 The housing figures in Appendix G are to be used as guidelines. Do you think these figures will be helpful in enabling local planning authorities to produce development plans? If not, how do you think housing need should be assessed?

The purpose of the housing growth indicators⁴ is to guide the distribution of housing within the region. However, these figures are not considered a rigid framework but as guidelines for local planning. The Council would like to raise concerns that this is an overly flexible approach to housing provision with regard to its likely adverse affects on urban areas. There is a need for policy controls to be included so that the issue of possible over zoning can be managed. There is currently is no equivalent to policy HOU 1.1 of the extant RDS, which required that over zoning should not exceed the exceptional 10%.

There is also no detailed information or guidance on the likely changes to these figures arising from housing markets assessments and the subsequent implications for joint working across the districts.

In its approach to deriving the housing allocations, it is considered that a trends based approach is inappropriate. This approach reflects a unique period of instability in relation to urban areas in NI and its continuation will undermine the capacity of the RDS to deal with unsustainable and dispersed housing development. Moreover, these allocations should be linked to the sequential approach by reflecting significant levels of brownfield capacity.

Q27 Do agree with the types of projects that the RDS considers as being of regional significance?

The Council would reiterate the comments in response to Questions 1 and 2 and agree that waste is of regional significance. The importance of "rethinking" waste should be highlighted with an approach moving away from waste management towards resource management and viewing waste as a utility that is as significant as other regional utilities such as water, gas and electricity.

⁴ the indicators for 2008-2025 are derived from HGI figures (1998-2015) published in June 2006, which were agreed by an Independent Panel which conducted a Public Examination in 2006.

The document references the “Towards Resource Management” Strategy which was published in March 2006. In November 2010, Minister Edwin Poots announced that he would be “honouring a commitment given in the 2006 Waste Management Strategy to work towards revising this policy before 2011”. We would welcome a review of this strategy as soon as possible.

The projects that are identified - renewable energy, waste, communications etc are strategically important as they are required for the well being and quality of life for everyone in the Province. The RDS should identify, in broad terms, the potential for locations or cluster areas to facilitate these developments to guide development and avoid a protracted planning process. The North Foreshore has the potential to be an environmental cluster to accommodate these types of projects that would help to create employment opportunities and attract inward investment opportunities.

Q28 What are your views on how the Strategy will be implemented and monitored?

The Council considers that the monitoring and review of the strategy is a critical element of the delivery. The Council would welcome the review process on a 3 yearly basis. Commitment was made in the Shaping our Future 2001 strategy to provide a five year and subsequent 10 year review. The Council would further suggest providing a detailed update report of strategy progress.

Q29 Do you think we have identified the most appropriate headline indicators? If not can you suggest more appropriate indicators and if possible the source?

The proposed indicator for waste could be made clearer by a more refined definition (*Indicators page 132: TABLE 7.1: Indicators Mapped to Aims % of waste sent to landfill -for example percentage of either household or municipal waste arisings which have been landfilled.*

Currently, councils in Northern Ireland report a number of Key Performance Indications through the Waste Data Flow System. Included in these, are separate indicators for the percentage of *household* waste arisings which have been landfilled and percentage of municipal waste arisings which have been landfilled. Also, as European waste legislation encourages recycling as well as discouraging the disposal of waste to landfill, an additional indicator that could be considered is “Percentage of household waste arisings sent for recycling and composting”.

The themes and measures within Shaping our Future 2001 were much more comprehensive and progressive and these should not be omitted. The post-2010 EU target is to halt the loss of biodiversity and ecosystem services in the EU by 2020 and restore them insofar as possible. Northern Ireland needs to prepare for future EU targets and commitments – this is something that the new review strategy needs to take cognisance of.

The proposed indicators mapped to aims should have baseline and target data attached to them so that progress is easily monitored and reviewed.