



## Development Department

Your reference: Regional Spatial Strategies

Our reference: #116056

Being dealt with by: David Purchase

Date: 30-3011

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Dear Louise,

### **RE: Consultation: Regional Spatial Strategies**

Please find attached our provisional response to this consultation document. Please note that this is still subject to final ratification by full council.

## **Provisional Response**

### **1.1. Overall comments**

- 1.1.1. While we have some concerns about the contents of the draft Framework we would like to say that we welcome this initiative and are in support of efforts to improve coordination and cooperation in spatial planning. We are therefore broadly in support of the aims of the framework, especially where it can provide mutual economic advantage such as in transport links, tourism, energy supply etc. The Council is already actively involved in a number of regional collaborative projects and will continue to support this approach.
- 1.1.2. For example, Belfast City Council (BCC) is an active member of the COMET (COuncils of the METropolitan region) and through this, also engages in the Interreg IVA cross border programme. Recent activities have involved cross border network groups, showcasing collaborative working, meeting MEP to discuss the areas needs, hosting visits and conferences on subjects such as successful trans-national working. We will continue to work on regional collaborative projects in areas such as creative enterprise education and development, supporting young entrepreneurs, local procurement, supply chain opportunities and innovation.
- 1.1.3. However, we are concerned that the framework document, its analysis and resulting conclusions are almost entirely based on the Regional Development Strategy (RDS) for the Belfast area. You will be aware that the RDS has only recently been out for consultation and hence can not yet have been finalised. We do not think it appropriate to base this framework on a significant but unfinished strategy document.
- 1.1.4. At the time of writing BCC's response to the draft consultation on the RDS is still being finalised but we should be able to provide a copy to you in April. Initial work on our Belfast Masterplan reveals several significant concerns about the assumptions and direction of the RDS. An initial overview of these concerns is provided in the following paragraphs. Until these concerns are adequately considered and appropriate amendments made to the RDS, it is difficult for the Council to fully endorse this Regional Spatial Strategy Framework.



### **1.1.5. Emerging Masterplan Themes:**

1.1.6. 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.

### **1.1.7. Concerns with the proposed RDS**

1.1.8. Based on this, the Council has a number of concerns with the proposed RDS. Firstly, 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.

1.1.9. 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.

1.1.10. As suggested above, the RDS needs to carefully manage the tensions between urban and rural. 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.

1.1.11. 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.

1.1.12. 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.



- 1.1.13. 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).
- 1.1.14. 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.
- 1.1.15. 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.
- 1.1.16. 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.
- 1.1.17. 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.

## **1.2. Specific points on the Regional Spatial Strategies Framework**

- 1.2.1. **Equipping the Island** – we support this principle of well planned, ecologically friendly infrastructure.
- 1.2.2. **Competitive Places** – we would support enhanced physical connections between key urban centres, promoting Belfast as a key driver for the region.
- 1.2.3. **Environmental Quality** – we would welcome the opportunity to work in partnership with authorities south of the border in strategic planning for the protection and enhancement of shared natural assets.
- 1.2.4. **Spatial Analysis** – we support the integration of datasets/ indicators. We work to develop GIS & demographic information, which allows an evidence-based approach to identify need and enhance service provision. Our existing datasets are available for analysis by external stakeholders.
- 1.2.5. In section 4.8 and 4.16 we suggest that consideration should be given to the implication of transferring planning powers to Local Authorities. While this would strengthen Belfast's position we recognise that it would potentially make regional spatial planning more fragmented.
- 1.2.6. We would also prefer to see an increase in specific guidance in the final document. The current version is more focused on summarising the existing strategies and the statistical situation rather than providing definitive advice or an approach to future strategies, projects and investments.

Thank you for asking us to respond to the proposals.

Yours sincerely

Dr David Purchase  
Belfast City Council