**LDP Draft Plan Strategy
Response from Ashton**

November 2018

Ashton is a non profit organisation working throughout North Belfast, employing over 200 people across 11 building locations. It was formed 30 years ago by community share offer within an area of high urban deprivation to develop job and economic projects. Ashton is working on urban issues relating to the York Street Interchange and its negative impacts on nearby communities.

Ashton is one of the lead organisations representing community views and projects in the Campus Community Regeneration Forum (CCRF). The forum is convened by Belfast City Council and involves all the relevant government departments. The remit of the CCRF is to find ways to connect Shankill and Inner North Belfast into the opportunities around the new Ulster University campus. We currently assist residents near York Street in dealing with the legacy of disruptive road engineering and its disconnection effects on residents, we have recent and detailed working knowledge of tall city centre developments and their impacts on nearby communities.

The response is prepared by architect Mark Hackett along with inputs from the Ashton Board members and staff.

Response Rationale:

Your responses to this stage of the consultation should be based on **soundness**:

P2. Has the council prepared its Preferred Options Paper and taken into account any representations

made?

C2. Did the council take account of its Community Plan?

CE1. Does the plan set out a coherent strategy from which its policies and allocations logically flow?

CE3. Are there clear mechanisms for implementation and monitoring?

We record numbers to challenge soundness as follows *1, *2, *3….

Plan Strategy Quotes:

TS03 2.47 - 2035 vision set out in Belfast Agenda
Belfast will be a city reimagined and resurgent. A great place to live and work for everyone. Beautiful, well connected and culturally vibrant, it will be a sustainable city shared and loved by its citizens, free from the legacy of conflict.

Note 3.10 … 'city centre first' ….balanced with need to distribute employment opportunities in areas of high unemployment and areas of multiple deprivation

Belfast is a city with well known for its spatial and social divisions. It is ironic that today we can often address sectarian divisions in the city more directly than city policy can address the well documented and deep economic divide in what Murtagh termed the 'twin speed' city. *

https://scholar.google.co.uk/scholar?hl=en&as_sdt=0%2C5&q=murtagh+twin+speed+belfast&btnG=1

With reference to TS03 - 3.10 we firstly note there is no clear definition, adequate map or indeed a POP paper that addresses areas of multiple deprivation, the issues, causes and difficulties for these areas internally and their disconnection spatially from the rest of the city. Published and detailed research on this subject was submitted to the POP stage. It is the lack of spatial connection in built form, safe good walking routes and community safety, that is one strong disincentive for good economics in many areas of deprivation, areas that manifest physically as enclaves.

The legacy of negative regeneration and spatial problems on inner city or edge city neighbourhood economics has many aspects:

- Investment and local business are disincentivised by blighted physical environments
- Residents have less economic spending power to stimulate internal economies
- Inward investment from global/national sources is disincentivised and flows to favoured areas
- There is less equity and value collectively in deprived neighbourhoods to borrow and reinvest
- Neighbourhoods suffer from transport inequalities in costs/time to access services elsewhere
- Walking, the cheapest mode to traverse the city - residents who need this most are denied it
- Poor environments and a lack of quality green amenity space undermines health and wealth
- There is less public investment in *mundane amenity*; pavements, kerbs, trees, rails, lights etc.
- This further undermines the 'draws' for economic investment

In a new LDP and papers we would expect to see a clearly detailed map of areas of high deprivation*, zones of urban spatial / economic division such as the Westlink and then policies and designations that would directly seek to address the causes of urban and economic division. This response points to a number of areas where, in our view, policy is not addressing what the Belfast Agenda sets out to do, or is contradictory. (ref: Soundness P2 and C2 and CE3)
*1 The map in the POP papers is small and lacks sufficient detail and grain - a map enclosed in appendix

TSO3 2.15 Anti poverty and Social Inclusion Strategy
This 2006 government strategy was aiming to deliver by 2020 - *A main function of the LDP is to facilitate development and* **create a framework to enable investment**. *The reuse of previously developed land can support this strategy stimulate enterprise in disadvantaged areas to tackle long term unemployment*

Firstly we note the later part of this paragraph (any excess land) is only one issue to address, no mention or analysis is made of the flawed and degraded built character of most disadvantaged areas. ***2** (research on this was submitted to POP)

A '*framework to enable development'* (in an LDP) must surely suggest an **urban space** framework, polices, remade streets, arteries and connective urban amenity (good street making) that would address those urban blockages such as the Westlink and blighted shatter-zones that have created an economic and spatial schism in the city. These issues have been well documented, economic reports have indicated how the West and North of the city suffer disparities in Inward Investment, funds and internal economies. This is not clearly articulated in the Belfast Agenda or POP papers. ***3 missing information** Conversely, a transport infrastructure allows better access for the wider metropolitan/rural area to jobs and services than half the city (with low car ownership) actually enjoys. Commuters coming into the city to work later return and retire to generally affluent hinterlands without the residential quality of life and amenity problems associated with areas of high urban deprivation. Without being physically reconnected to successful places and economic drivers the disadvantaged areas of Belfast will not transition to become better places.

In reading the Belfast Agenda, LDP proposed policies and zones there is an inherent contradiction that occurs when it comes to the spatially defined places of the **solutions.** (jobs, economic/office zones, city centre, parts of arterial routes and indeed other designations such as AHC and Conservation zones). The economic problem shifts mid paragraph, by sleight of hand, from being particular to place and people (areas of deprivation) to solutions that are framed in a generalised city wide manner - and then back to other favoured areas that are unconnected to areas of high urban deprivation. The assumption is that jobs may be created in zones of the city that may be better designed and serviced, and it is the role of people in deprived areas to make their way to these jobs, and then return at night to 'their areas', largely deprived of internal sustainable economies and connective urban **frameworks.**

This is a limited and 'base' (low) assumption about economics/employment and both papers fail to address the policies that would stimulate and allow places of deprivation to 'transition'. As one area of the city improves/fills - by contrast other unaddressed areas are comparatively marginalised, enclaved and thus become relatively worse. There is a convenient contradiction in

shifting from place based (deprivation) to people/processes (jobs/opportunity) and back again to other places (favoured/privileged areas of the city) *4 We contend it is the job of a proper LDP and functioning city to create broadly equal opportunity for investments and improvements in all city zones and sectors. *4 Whilst areas may differ (affluent leafy suburbs or dense connected centre living) there should be some level of **commensurate** benefits and qualities for all sectors of **a well functioning city**. Of course many jobs will not align with where people live - but where people live should have good places and appropriate economies. They should not be dormitory estates of poor amenity or enforced enclaves, at least not in the case of inner city. These comments are made recognising a clear wealth schism in the city defined broadly along the line of the Westlink.

This contradiction presents as a spatial and economic one, and in turn policies may continue this legacy by failing to tackle it directly as spatial. The concept of 'affirmative action' should apply in planning analysis and policy. Put simply, deprivation is manifest in *places and the spatial*, and it is formed and entrenched by *planning*. *4 this is not consistent with the Belfast Agenda

If we take the Belfast Agenda at face value; "Belfast (as a whole) will be a city reimagined (as a whole), a great place to live and work for **everyone**. (in their residence / all neighbourhoods) Beautiful, well connected and culturally vibrant, it will be a sustainable city shared and loved by its citizens, free from the legacy of conflict.

One of the legacies of conflict has been whole zones of the city which have been cut off from the economic centre, from economic development and inward investment. (by a road *'cordon sanitaire'* to quote statutory 1970's planning minutes) A good part of this was facilitated by skewed past planning policy and area designations. Therefore, contradictory positions and polices in this LDP will not only maintain intact the spacial and economic legacy of deprivation, as selective city improvement occurs, the policies and allocations will deepen the economic and spatial schism.

What the Belfast Agenda appears to promise is that spatial neighbourhood disparities can transition to become 'great places for everyone'. We would argue that the role of a sound LDP is to be specific in addressing areas and enclaves of deprivation. The city is not equal, so applied policies should address these characteristics in the city *5 - in this sense it is not 'sound' or consistent with the BA. To achieve this, papers first need to recognise, draw and depict the issues of deprived areas correctly - this sensitive analysis needs wide scrutiny and agreement. Given that NISRA output areas are measured on a place based manner - it is to be expected that planning would use similar methodology to tackle social exclusion with policy and designations.

However, NISRA super output areas are not fine grained and can be misleading in map form. For instance, the docks and lough are shaded as high deprivation, as are unbuilt parts of the mountains. In the finer grain parts of the centre are high value but can be shaded as high deprivation by dint of small enclaves adjacent.
(a fine grained and adjusted map of deprivation was submitted at POP stage and enclosed below) *1

CONNECTNESS

We suggest the LDP and Belfast Agenda must qualify what **connected** means *6 , its use is apparent throughout the Belfast Agenda to mean a multitude of ambiguous or unrelated things. In urban and spatial terms 'connected' must firstly mean with 'good urban fabric', safe, well used social streets and the assumption of walking as the primary movement mode in a city. The work and methodology of Jan Gehl is universally recognised and referenced in this regard.

"Connected" in the Belfast Agenda can be seen to mean road and rail to airports, the internet, cycle ways, economically, health, virtually, connected by knowledge or awareness (of job opportunities). At times documents show maps of streets which are viewed as arteries or 'connections' - however a cursory knowledge of Belfast reveals that (for example) up to 1km of the inner Falls or Newtownards Roads have not one shop, nor sometimes hardly a frontage or window. This leads to profound fears of walking and causes disinvestment. Frequently these shatter zone areas are also perceived in sectarian terms, these arteries are not however those

barriers being referred to in TBUC or in the Belfast Agenda as being 'between neighbourhoods', rather they are between a neighbourhood and the city core. There is an important distinction to be made in definition here. Many shatter zones are barriers that were imposed by government onto a community to detach them from the centre.

Is the city to be 'free from the (this) legacy of conflict'.? *7

It is false and unsound if plans and maps illustrate and discuss 'connections' that exist as mere roads that pedestrians fear to use or are inhibited from using, or if in written policy terms 'connected' merely means a bus route or information/opportunity for employment. We find this misleading or ambiguous, and therefore unsound. *6 clear and consistent definitions

For the Belfast Agenda and the LDP to be sound, planning documents should have an accepted and clear definition of 'connection' and 'connected' *in the urban sense*. We contend the work of Gehl on streets and walking defines and explains this best in an internationally accepted way. It merits an POP paper and policy in itself. *8 missing theme

We note in an appendix quotes from the Belfast Agenda to evidence this point. In places we read "Belfast will be a well connected city" whereas a critical reading of policy and projection reveal this not to be the trajectory we are heading towards. The connection referred to is revealed to be 'other'.

Investments tend to flow and be drawn to urban environments that are whole and contiguous, that have deep urban connectivity into residential mixed use areas. Success breeds success. By failing to analyse, solve and stimulate overcoming divisions, planning reinforces the blockages that cause disinvestment. We question if this adheres to the promises made in the Belfast Agenda. *6

The disappointing aspect of reading the section **'Living here'** (page 28+29) of the Belfast Agenda is that many of the urban shatter-zones, disconnections and blight could be projected and imagined to remain. No mention is made here of reconnecting inner city residents or dealing with the sharp economic schism in the city that affect *'where some people live'*.

ARTERIAL ROUTES - CITY CENTRE ZONE - TALL BUILDINGS

Whilst is certainly true that the city centre of Belfast needs to recover further for the common civic good, it is **equally true** that deprived neighbourhoods nearby should be physically connected and be allowed to transition into good places with internal economies - at the same time. We argue this is imperative for the civic good if a social and spatial 'doughnut' effect in the city is to be avoided in future, an effect that limits and undermines the city for everyone.
(A doughnut analysis was clearly presented in POP submissions) *8 missing issues

If solved, stronger neighbourhood economics might then manifest in better spatial and physical arterial routes, routes for mixed, specialised and independent services that all city citizens might use. In this way the arterial routes, particularly in their final connections into the city, can transition to 'shared spaces' and erode the sense of sectarian space that is sometimes manifest on city arteries. This would return the city form to a 'star fish' diagram of development - a well accepted urban concept that is inexplicably missing from POP papers and policy. (Belfast evolved as and was a 'star fish' city) *9 missing issues historical urban context

When examining the arterial route maps, designations and the commercial spaces, there is no sense in which the legacy of inner city arterial 'shatter-zones' are recognised or are to be repaired. Such shatter-zone areas are somewhat recognised in the POP papers, but their repair requires special definition. This relates to areas of parking restraint designations and other polices to allow appropriate development to occur. Ultimately these designations should relate to UDG grants and specific design polices to achieve good places in these particular environments. The planning challenge in Belfast's environments between core and inner neighbourhoods is arguably unique in

Northern Ireland. ***8 missing issues** For the LDP to be sound this issue needs greater recognition and appropriate new policy, especially on the issues of building heights/tall building policy.

This also speaks to the City Centre zoning boundary. It is striking that this zone follows the Westlink motorway. This makes little sense for instance on Clifton Street where the original street and scale led to Carlisle Circus as a node. (i.e. past this line) Few would argue today that the Westlink was a necessary, legitimate or wise decision. The main motorways (M1, M2) could have been better connected behind the mountains linking seamlessly/directly to the airport/Larne with tail links then to the Belfast Port, across the river docks as a normalised city street bridge / and dispersed into city avenues - this is how other cities accomplished strategic regional connectivity. The fact that the York Street Interchange motorway connectivity may only be implemented a full 60 years since its conception only proves the lack of wisdom in bringing the main country wide strategic motorway through the city core and having its motorway role clogged and confused as a intra city distributor road.

This may be taken as an opinion - but where the LDP is certainly unsound and contradictory is in assuming this recent motorway as a boundary for the city core and its policies. It embeds a decades old sectarian and socially flawed decision into planning and the LDP , denying the nature and history of the city and its arterial routes. ***10**

What is needed, in our view, is a recognition (following previous well argued analysis and submissions) that inner arterial routes and shatter-zones around the city core need specific designations. These might appear as contour mapping whereby the city centre policies are calibrated into arterial policies. One positive result of such a policy could be to prevent the enormous disparity in heights that communities around the core experience in developments immediately adjacent. At the moment 35m is assumed to be a new norm/policy transition point against 5 metre high residences.

To give an example; Lancaster Street and Thomas Street are currently being overwhelmed by wide 50m tall 'slab' buildings such as the Ulster University and by a host of 12-15 storey buildings that also surround a small Listed building and active primary school. These developments lie to the East and South of the area and come together as a shading mass that will block **all** morning, midday and early afternoon sunlight in the winter months to around 15 houses, and will impact negatively on many more. Notably clustering has made matters worse for these residents, this clustering occurred because of weak planning control and a misuse of precedent that displays no other logic (to contradict 3.14 of POP paper 07). ***11**
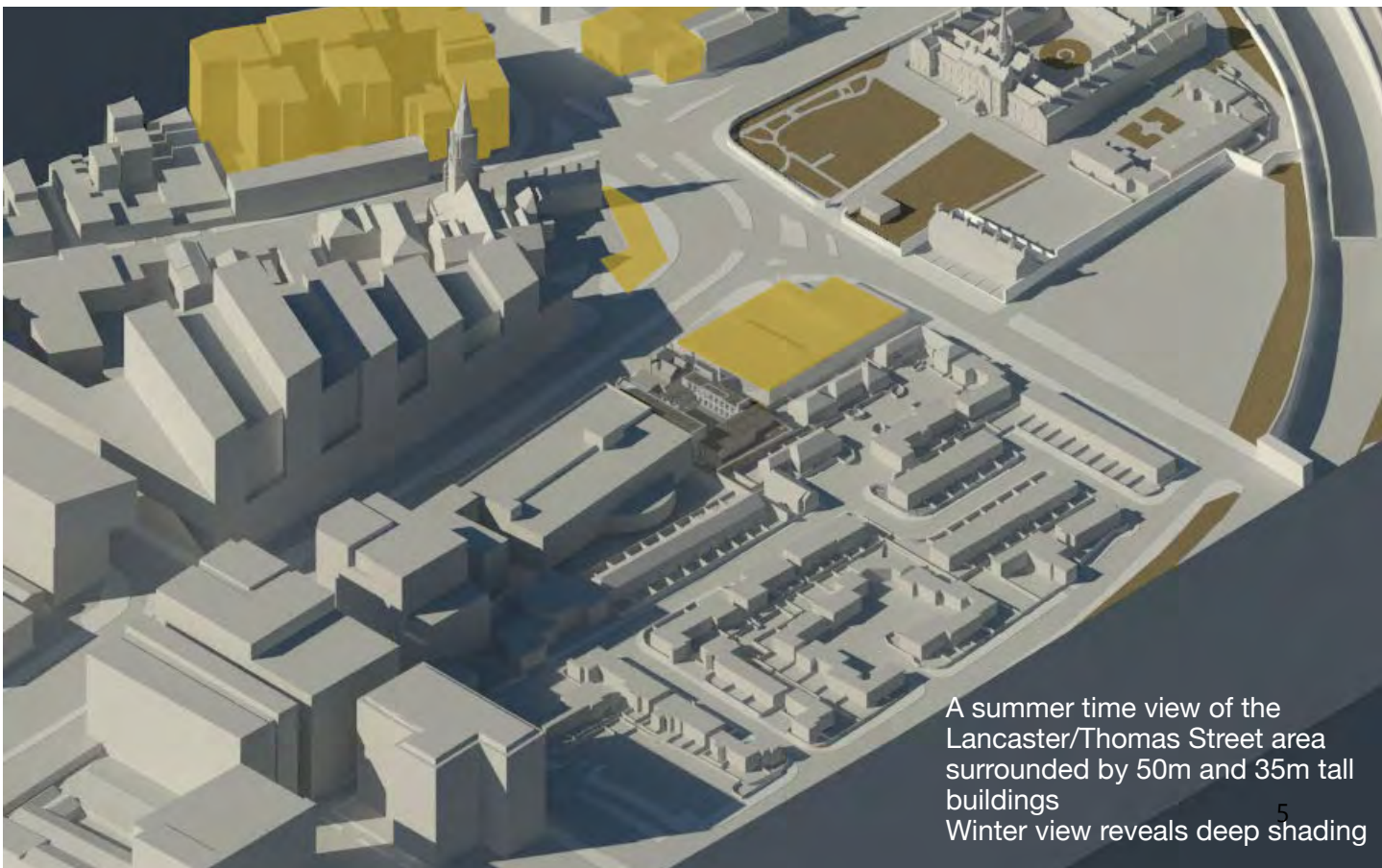
A summer time view of the Lancaster/Thomas Street area surrounded by 50m and 35m tall buildings
Winter view reveals deep shading

5

This situation is replicated around the city core and is not being addressed by policies and designations. Indeed there is no agreed shadow cast analysis that deals with studying these issues rationally and fairly for citizens. (VU.City can allow this but no light and shading methodology has been agreed) This does not, in our detailed knowledge of this example and the people affected, equate to a "sustainable city shared and loved by its citizens."
*12 lack of methodology

In the list of tall building approvals, the reasons demonstrate that breaking BMAP limits relying on precedent from other approvals has become the norm. Elsewhere tall buildings policy speaks of judging each case on its merits, this contradiction means that heights are actually determined by precedent of other approvals, 'the horse has bolted' and this seems set to continue.

In Belfast the economic return (rental) on office floor space is limited compared to other cities. Building costs across cites remain much the same, and thus excessive floors in Belfast are squeezing diminishing returns from those floors. The real problem, which is mentioned, has been excessive land costs relative to the city economy. This spiral has many negative consequences, it increases risk and uncertainly when buying sites, and leads to a cat and mouse game between planning and developers, where some developers seem to be the 'cat that got the cream'. The worse aspect is that applicants mostly sell on their sites (or land bank to sell on) and the building economic uplift, once extracted, leaves very poor built fabric by the actual builder or continues as blighted land. Given the nature of the city (large amounts of excessive space and shatter zones) it would make more sense to cap heights, regularising site values, bringing certainty and thereby increasing the 'filling in' of the 'missing city'. **13 duty to create an orderly framework**

Advocates of dense cities are not wrong - what we need to remember is that Berlin and Paris at 7-8 storeys create much higher densities than anywhere in Belfast, density is a function of clever and astute urban form, courtyards, wide pavements tree lined avenues as amenity and the balance of built form to space to create maximum density while maintaining the quality of urban space. Much of this is well researched internationally and heavily evidenced with fact and data, but is absent in the POP papers/tall building policy ***14 duty to create an orderly framework**

The City and the Planning system has allowed itself to be caught in a negative and pointless spiral, this LDP is the opportunity to reset this. We find that a POP paper on the economics of building would have informed debate and allowed 'orderly development'. ***14** Informed opinion would highlight that there are various costs and building regulations that prompt certain logical heights. One is the 18m (22 overall) top floor height beyond which a fire fighting shaft, independent lift supply and dry risers are needed. In a smaller scale, a single stair office building 11 metres top floor (15 overall) is an efficient plan form. ***14**

Some logic for tall buildings allocation may be more acceptable. University, hospitals and other public buildings may be city landmarks and in the **public** interest. The Ashby building was an elegant case in point - but it originally generated green lawns at its base (now lost) and did not dominate its residential neighbours sunlight. The logic of height for formal space has been used with skill in New York (the Seagram building). New zones well away from existing residents and historic fabric could be proposed at medium or tall scale.

Where most discontent occurs is against inner city working class areas. There have been enough Judicial Reviews and well published cases (Stephen Street, Stewart Street, UU) for this issue to have been studied and drawn with care in a tall buildings paper. ***14**

ZONING

It is notable that in other places the city centre zone omits the new transport hub and its hinterland, includes Sirocco lands, but excludes City Side. Again, a more nuanced 'isobar' or contour map designation for the 'centre', 'centre edge' and 'inner arterial' city would allow appropriate policies to be enacted to achieve the aims of the Belfast Agenda for neighbourhoods around the city core, most of which are areas of high deprivation currently being negatively impacted by excessive development and commuter parking.

ATC and CONSERVATION AREAS *vis a vis* DEPRIVED AREAS

Policies which tend to favour areas of higher income and affluence. (This contrast can be seen clearly in Topic Paper 07 fig 2 compared to maps of urban deprivation.)

There are a number of areas of policy which have the net and measurable result of drawing additional resources to areas of the city which are by default affluent. Conservation Areas are (bar one) in areas of affluence, ATC are more varied but are invariably not areas of high deprivation at the micro level. In planning applications this brings a considerable raft of policy and resources in planning administration but it also systematically becomes a mechanism to draw similar resources from other departments. Buildings in Conservation areas and ATCs require better materials, design, landscaping and finishes, firstly these are 'materiel' that policy draws to areas that enrich them physically. This care in design adds amenity, health and well being benefits.

Better quality kerbs, pavement details and conservation street lights are implemented by DfI for example. Council grant funds are, and can be, similarly skewed in grant aid for higher grade buildings or parks in these areas. This may apply to spending by DfC or any Department making a physical project in an ATC or Conservation area, public projects that will require higher quality materials than in other areas of the city.

Conservation areas have protections on existing gardens, soft landscape and hedges, this helps retain the visual appearance of an area in Arcadian planting and street views, but it also creates landscape amenity, land permeability and trees in private gardens with a measurable shared/quasi public increase in health and well being along with economic value. With economic value and amenity comes footfall and better commercial infrastructure. The knock on effects continue; TPO Tree protection orders are more likely to be enacted in ATC and Conservation Areas, whereas the few remaining feature trees are easier to fell in deprived areas.

There is ample peer reviewed and scientific evidence pointing to the benefits of landscape and amenity brings to neighbourhood residents, child development and attainment. It is the duty of a Planning Authority to be cognisant of this evidence. If we aim to deliver health benefits and reduce lifespan differentials across the whole city, it is relevant to develop equable policies.

This situation prevailed unquestioned for so long that we have to stop and consider how these seemingly admirable and worthy policies work in the unequal distribution of city funds and resources. It may seem logical to protect environments, but there are aspects of environments that must be provided equally across a city and to its citizens to be consistent with promises of the Belfast Agenda. *15
(ref: Soundness P2, C2, CE1 + CE3)

If we backcast to 1962 (before Matthew) there were many fine buildings, small landscapes and strong character in working class areas and through arterial routes with working class areas adjoining. The planning policies of previous incarnations of LDP (the Matthew and 1969 Travers Morgan plans) systematically and specifically targeted these areas for wholesale renewal and the destructive effects of flawed road planning. Significantly the POP papers do recognise some of the flaws of these policies. The implementation of the 1969 plan only took place much later from the late 1970's and was still systematically in full swing into the 1990's - it is a legacy of conflict.

By 1980 nobody could ignore the weight of evidence against the sorts of 1960's planning and roads policy being inflicted on Belfast. Elsewhere these polices were questioned, halted or reversed. In Belfast the destruction of working class areas continued systematically, relentlessly, uncritically and with great public expenditure. There are three guises or falsehoods which masked and enabled an uncritical governmental and media view to this process: One was the conflict or 'Troubles' - that it justified many incorrect urban actions. A second is that general industrial decline prompted or necessitated specific working class neighbourhood removal. Third, was that the fabric and grain of areas was of no value and thus entire areas were expendable en-masse including other embedded non housing assets. In this process massive reconfiguration of street grids into loops of *cul de sacs* has caused almost irreparable harm. (see figure below) Middle class and affluent neighbourhoods in close proximity were rarely treated in this way by planning policy.

There is an onus to recognise this local blindness has infected planning and that it is part of the legacy of conflict - the Belfast Agenda aims to deliver 'free from the legacy of conflict'. It is perhaps striking that a POP paper outlining this history, development and character of the city is absent. It would be normal (elsewhere) for this legacy to be considered and critiqued more openly and in detail, because examining legacy leads to better solutions. *16
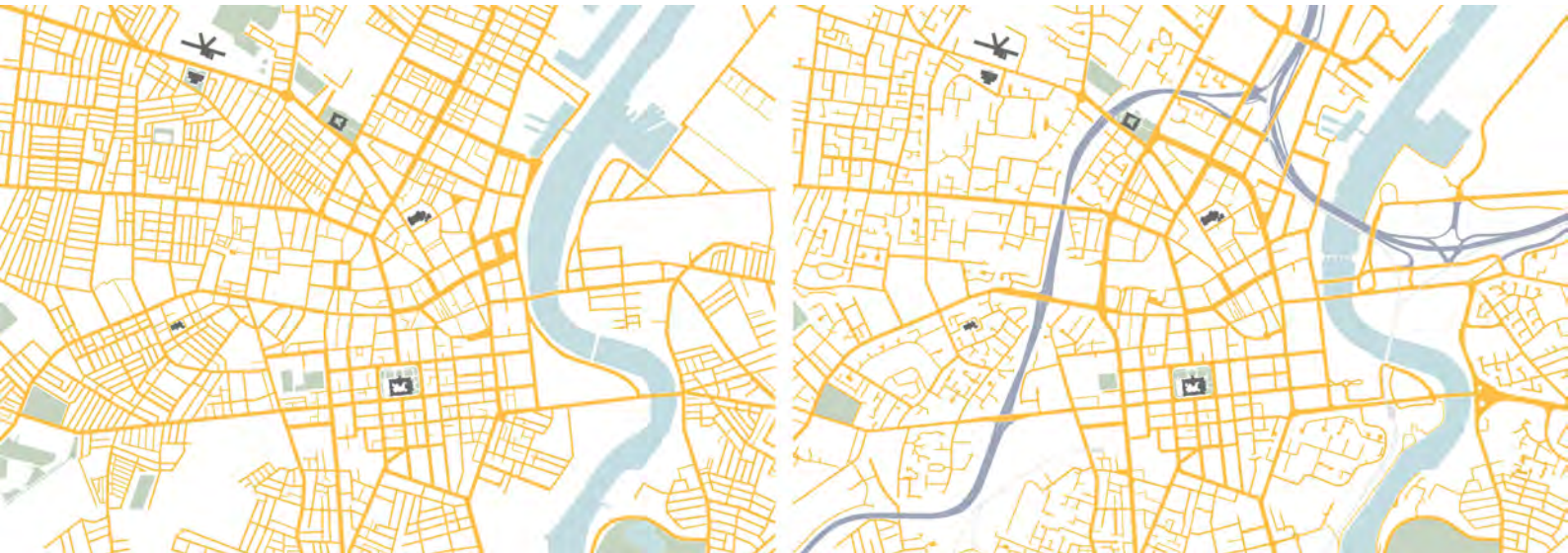
Maps of street networks 1965 and the city today - note stripping of street/walking connections throughout the inner city

In Berlin, a city with some obvious similar legacies, the IBA 87 was begun in 1973. (International Building Exhibition) By 1987 most of 5,000 new homes and 6,000 renovated homes were complete. The principles of urban block renewal at medium height and high density were tested here. In 1990 when a new city plan was required, the IBA had laid the ground for **'Critical Reconstruction'** as an urban policy. This carefully studied the structure, history and grain of the city but renewed it in multiple ways, policy and method growing out of careful analysis.

This is mentioned for two reasons; firstly, this work is well known and regarded in professional circles, and secondly it illustrates an approach that is missing in the POP and current draft plan. An approach that looks more analytically and carefully at the grain of the city before the negative developments of recent decades, where the city lost population and declined. (as Berlin did)

We contend for the LDP to be sound, to fulfil the stated aims of the Belfast Agenda, it needs to adopt similar well researched and skilful spatial approaches to dealing with the legacy of conflict and the creation of enclaves of deprivation. This fundamental analysis should have happened by now - it can't be tagged on during the next stages.
*16
maps illustrating what a restitching process could look like, rebuilding connections as '**streets**'

It is important to state that the current LDP is not starting from a neutral 'tabula rasa' - it is a continuation and adjustment of previous policy, often lifted whole or little evolved from the periods mentioned above. To be effective and to be adequate to its remit, an LDP must carefully unpick and analyse the effects that its policies have had and will have *vis a vis* the issues of city equity outlined above.

The result of the 1980's and 90s was to create poor inner city ghettos of low density housing often in a *cul de sac* format. Much street grain and street connectivity was lost (maps of this were submitted to the POP stage and are reproduced here) In the redevelopment and Westlink process many shops, small businesses, public buildings and facilities were vested, demolished and rebuilt in a single agency monotone of housing. Since 1990 there has been some insufficient efforts to build back facilities, jobs and programmes into these areas.

Examination of OS maps past to present evidences that many areas of high urban deprivation today were former working class areas that were stripped of their internal retail, small workshops, businesses and social facilities. Many of these areas mixed the middle class, commercial and civic buildings throughout working class areas at that time. By and large this grain was stripped and lost. The population density of these areas also declined by over 50% in the rehousing programme, with knock on effects on the internal economics of these neighbourhoods and also the arterial routes that connect through them, arteries that are the lifeblood and connective tissue of any well functioning city.

Since the 1990's grants and efforts have been made to deal with urban deprivation - the question researchers at the end of every programme ask is; - '**why do these areas not alter or improve significantly?**' - the answer must, in part, lie in the form of their destruction and/or their remade form in planning terms. None of this history and context is evident in the POP papers to inform current issues and solutions. ***16**

Land use and planning policies led and created these negative urban effects - Significantly - **the LDP can also lead the transition** to overcome the destruction of the past. (as promised by the BA)

THE NATURE OF EMPLOYMENT OPPORTUNITIES AND SPATIAL PROVISION

Note 3.10 … 'city centre first' ….balanced with need to distribute employment opportunities in areas of high unemployment and areas of multiple deprivation

We note industrial, investment zone maps and allocations particularly throughout West and North Belfast. Many of these have only one or two buildings, uptake in these zones having been difficult to achieve. (for the wider city spatial reasons elaborated above) The majority of these pockets of land are spatially incoherent and 'gated' with no connection to adjacent areas of housing or communities. They usually contribute little to arterial routes or actual local communities nearby. One must question if the nature of these uses and spaces is really embedded within or contributing to North and West Belfast and areas of deprivation. Rather, these zones depend on car/van use and are not integrated into the built form of the areas they lie within. In part this also reflects upon residential areas that are themselves designed (by government we should remember) as inward and enclaved. This is typical of the outer city, Springfield Road, Hillview, Duncairn etc.

Therefore, we suggest the nature of delivery mentioned in TS03 3.10 could be barely real. This contradicts with the wider aims of the Belfast Agenda and the mechanisms to make investment improve where (all) people live. Again, the papers and LDP switch from areas of deprivation, jobs in the abstract and then back to where where jobs may be provided in other zones, however all these things manifest here as spatially separate and entirely unrelated. This is an inherent contradiction within the promises of the Belfast Agenda and policy. In other favoured areas of the city, investments are more linked into spatial forms and provide visible and measurable regeneration benefits. This is an example /outworking of legacy of conflict issues that we have highlighted.

We return to our initial introduction - this commentary is important to Ashton because we recognise the need to be embedded in, and to economically transition, deprived neighbourhoods. Many other groups in the city have similar histories - there seems to be little recognition in the Belfast Agenda and Planning Policies to recognise this history and the solutions that grass root non profits have provided, albeit with inadequate resources to the scale of the task.

In this submission therefore, we believe policies must be measured against their impact on the city as it stands (its flaws today), and also to remedy the negative impacts of previous LDP plans and policies. Policies should make affirmative actions to deliver on the promises of the Belfast Agenda.

We are not arguing that historic fabric should not be protected - what we are advocating is that the poorly designed fabric that many communities had imposed upon them should be treated **in the same manner** and attract at least the same resources and care in place-making. A strong case could be made for affirmative action in these areas since it would lead to a better balanced city more at peace with itself, open for the benefit of all. Affirmative action polices (and budgets) in areas of deprivation would balance the benefits ATC and Conservation policies bring to areas of affluence. ***17**

Some city polices should be universal:

- We could have a system that changes (retrospective), encourages or enforces landscape and garden insertion into neighbourhoods that are overly 'sealed' with hard landscaped areas and excessively wide roads. (this also benefits city drainage)
- We could have a system that enforces common standards of street trees, hedges, pavement, kerb and street amenity.
- a system that enforces and provides green spaces of quality and good management within 300m and parks within 1000m of every resident. (Cities such as Nottingham have adopted such standards)
- We could adopt approved materials, bricks, kerbs, furniture etc to be used uniformly **city wide** - most cities do this.

Why should polices favour and protect one area and not ensure that similar resources and care is taken in other areas? ***17**

Why do poorer neighbourhoods deserve less stringent policies simply because they, by dint of previous poor policy, have had their historic fabric stripped out and degraded? ***17**

It should be remembered that this process (of degrading fabric) was mostly implemented by government agencies, not by the private sector. In this sense it cannot be blamed on the vagaries or misfortune of 'the market' or some external force.

We cite the evidence of the publication 'Happy to Live here' (1+2) available at PLACE. BRCR published 'Shared Space 2011' by Forum for Alternative Belfast, and a POP submission map that demonstrated inner city areas 'not within' one kilometre of a public park. (below) The overlap in this map with areas of high urban deprivation is almost exact. Poor neighbourhoods have hard environments and poor green infrastructure, there are no city wide systematic and detailed policies that would seek to change this or correct it.
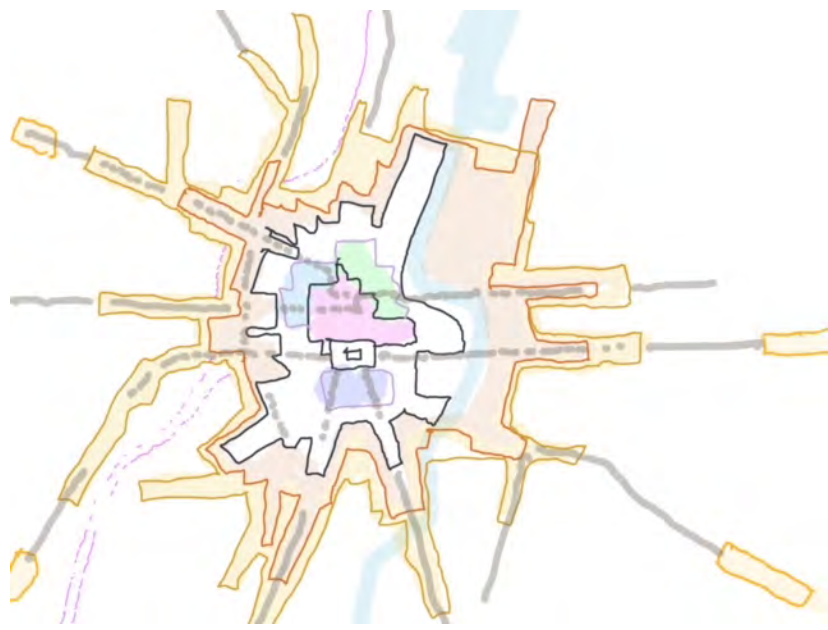
A 'star fish' diagram of 'restitched' arterial routes

An **'isobar'** of considered **centre zones** that largely ignores the Westlink and recognises arteries, many of which also lead straight through the core and should **properly be termed - city axes**. Recognise interface with residential communities and guide height and massing more clearly
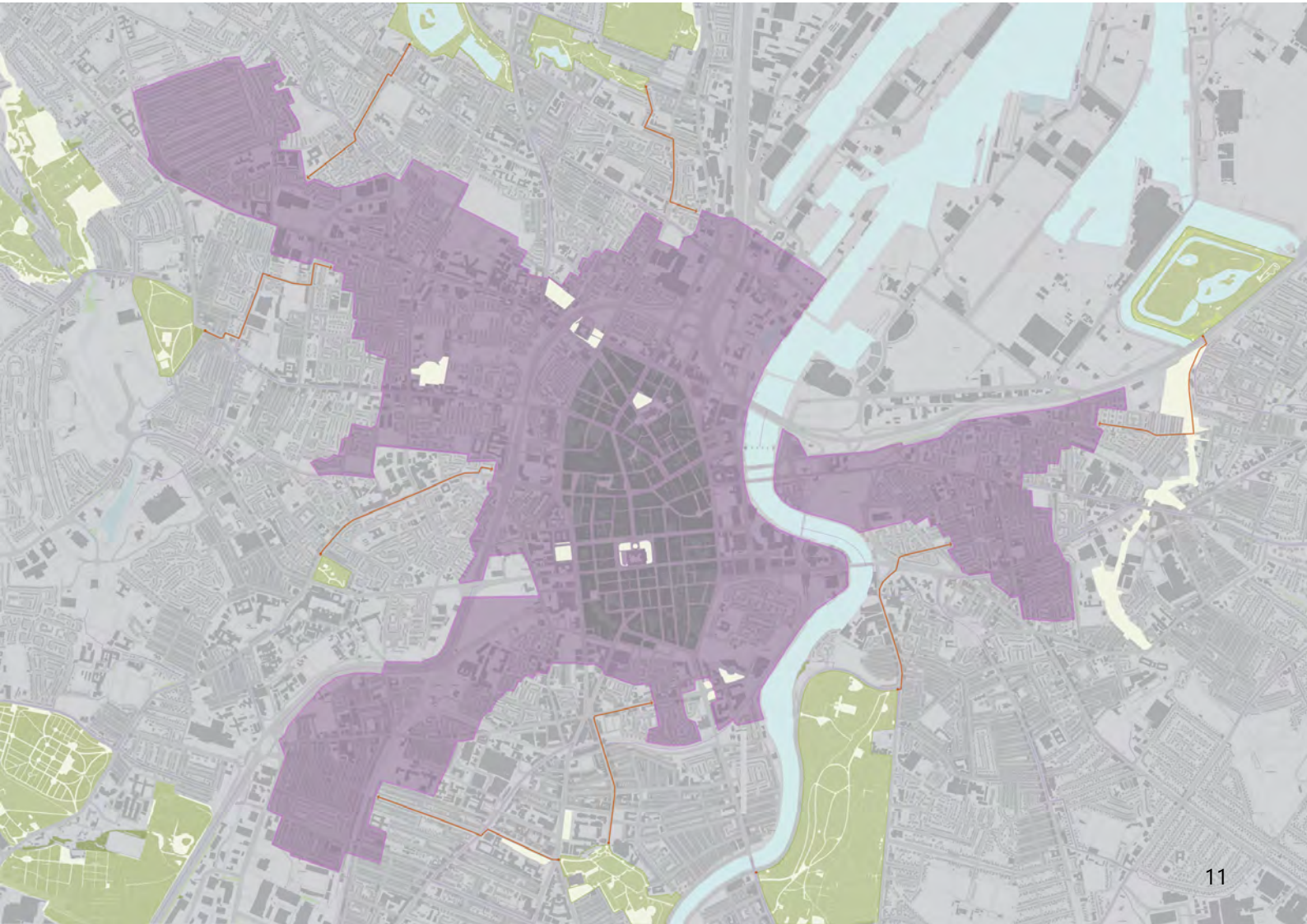
map of areas 'not within' 1km of a public park

A map of urban deprivation (darker) with adjustments for roads, docks, mountain and largely non residential core
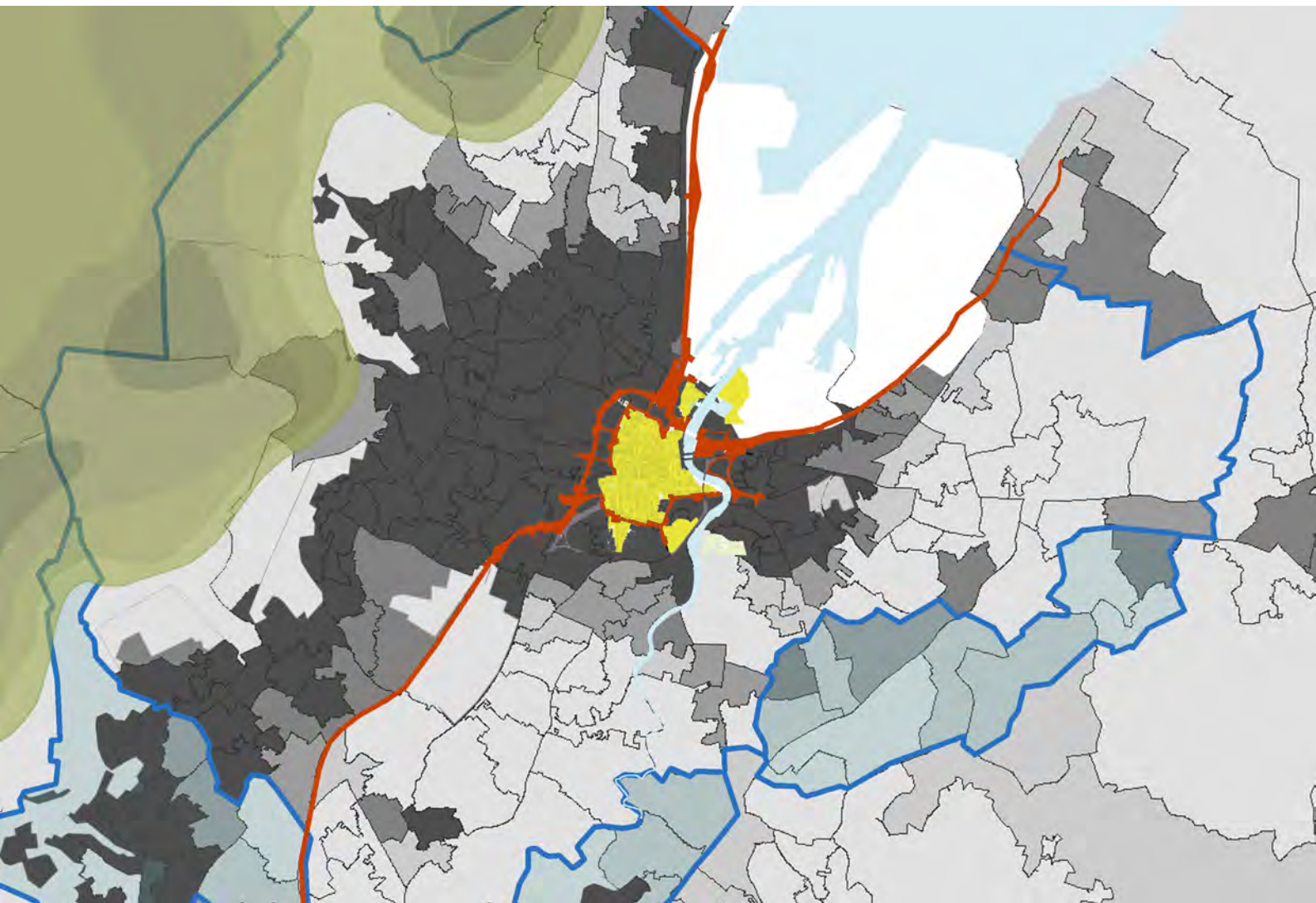
SOCIAL HOUSING

The provision of affordable housing is to be welcomed, unfortunately the policy does not address social housing. It states that 'affordable housing (a mix of social rented and / or intermediate housing) will be secured by way of section 76 planning agreement, which should be in place in advance of planning permission being granted'.

How will a private developer will be in a position 5 or 10 years after the completion of a scheme to guarantee that dwellings remain 'affordable'? Private developers will not be able to provide 'social rented housing' unless they are to be registered and regulated by the 'DSD' (DfC). As private, for-profit companies, they do not qualify. This matter would need resolved before not after granting permissions.

To counter this a revised policy must:
• insist on legally binding design and build contracts between private developers and housing associations.
• Encourage and enable housing associations to bid for development opportunities, both as partners and as lead agents.
• Provide mechanisms and opportunities for partnerships between the private development sector and housing associations.

For 'sustainable and inclusive development (being at) the heart of the LDP' there must be clear zoning and allocation of social housing, and sites that must provide social (not affordable) housing within the mix.

DRIVERLESS TECHNOLOGY

The rise in driverless technology is bound to impact on the life of this plan and indeed may become more clear in the coming years. It seems likely that cities that adopt systems will have driverless zones and hinterlands of traditional systems. Such technologies could have city changing impacts (positive perhaps) similar in scale to the negative effects mentioned above from the previous technology.

At least 10% of vehicles will be fully autonomous by 2035, and those cities and city regions which will be competitive then will be those which embrace new technologies. Belfast based on current evidence will be behind the curve in embracing technologies, given our history with the car outlined above, some predicative and adaptable planning papers should be considered in the plan.

OTHER ISSUES OFFICES AND INDUSTRIAL LANDS

Policy EC6 – As the iso-bar map illustrations above suggest, there is scope to allow larger office development to be integrated into neighbourhoods and residential areas where specific nodes and opportunities arise, this could occur in open/street like development, not gated fenced estates, and thus contribute to dealing with blight and aiding true connectivity.

For North Belfast the following areas are opportunities to bring nodes of quality investment, larger office use etc. into the heart of areas that need investment and change but which may not be all appropriate for housing: We believe zoning should be more fine grained and reactive to 'place'

• Areas around York Street Station and links to TQ via Sailortown
• Some sites around the Interchange
• Giants Park and North Foreshore - capitalising river frontage links back into residential areas - it is not clear that this is being done - requires a major new pedestrian / cycle link or 'green bridge' over motorway for North Belfast to actually benefit directly, currently the site is isolated.
• City Side - a site (mostly car parking currently) that bounds housing and arterial routes that needs future consideration, could integrate housing, offices and link city centre type investment into and against communities in useful ways rather than acting as a 'gated' urban block.
• Girdwood sites, currently being developed at too low density

cont.

Connectivity appendix

below are quotes from the Belfast Agenda that illustrate definitions of connectivity that are not consistent or clear when applied to Planning and detailed LDP methodology

Connectivity: there are two airports within 30 minutes of the city centre…….

Connectivity (Digital): Almost 100 per cent of households and businesses have access to high speed broadband.

However, we recognise that there are still things that get in the way of all our people benefiting from our city's success – barriers to employment, poor connectivity between our neighbourhoods…….

Belfast should be a city re-imagined in which no-one is left behind.

improve the quality of life and wellbeing of all residents ….we want everyone in the city to experience these outcomes…, where ever they live

ensuring people feel safe and have good living conditions

Connecting people to opportunities

Connected health

We need to be a connected and cohesive city that extends its influence well beyond its boundaries and delivers for the local population

Central to this are good infrastructure and connections……

We will continue to invest in the infrastructure, connectivity and attractiveness of the city to accommodate and encourage investment, aligned to the city's Local Development Plan.

Maximise the city's connections worldwide to drive growth

We will work with city partners to deliver a new International Relations Framework to maximise the city's new and existing international connections….to attract international students and drive trade…

Innovation Factory that not only connects new social and economic regeneration with local communities but also joins other innovation hubs to….

Connected, well planned with the right infrastructure to succeed

develop the city's infrastructure and improve connectivity locally, nationally and internationally;

We want to better connect the city centre and the communities that surround it.

Connectivity is vital, Belfast is the transport and logistical hub for the entire region. Our port…..George Best Belfast City Airport and Belfast International Airport ….improve air connectivity

vital to connecting our communities to opportunities for jobs and to each other.

Digital connectivity is improving

provides the necessary connectivity for business growth

city centre living and creating a vibrant, well-connected environment for people to enjoy.

improved digital connectivity towards an ultra fast city,

This joint city approach is a real opportunity to support people to connect with each other

connects people to opportunity

Develop the city's infrastructure and improve connectivity locally, nationally, and internationally

Connectivity: there are two airports

Belfast is a vibrant, attractive, connected and environmentally sustainable city

a map of shatter zones and street links to be repaired connect and fix the city for the benefit of all.

Zones of development:

Areas where only proactive spatial planning can lead and reshape a coherent city

derelict buildings or near end of life
blighted spaces of disinvestment
empty
car space
lack of street scape / over engineered roads