Submitted to **Belfast LDP 2035 - Plan Strategy**
Submitted on **2018-11-15 15:49:34**

Overview

1. Data Protection

Q1. Please tick to confirm that you have read and understood the privacy notice above.

I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

Q2. Do you consent for us to publish your response?

Yes, with my name and/or organisation

2. Your details

Q3. Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

Individual, Organisation or Agent:
Organisation

Q4. What is your name?

Title:
Mr

Full Name:
Christiaan Karelse

Q5. What is your telephone number?

Telephone number:
██████████

Q6. What is your email address?

Email:
████████████████████

Q7. Did you respond to the previous Preferred Options Paper consultation phase?

Yes

If yes, and you have your previous response ID (beginning ANON) please enter it here::

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:
Belfast Healthy Cities

Your Job Title:
Project Officer

Address Line 1:
22-24 Lombard St

Line 2:

Line 3:

City:
Belfast

Postcode:
BT1 1RD

6. Before you submit your comments

7. Is the plan sound?

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

Q12. Do you consider the Plan Strategy to be sound or unsound?

I believe it to be unsound

8b. Unsound

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::
Section 7.1 Housing

Policy (if relevant):

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
The quality of the dwelling that people live in plays an important role in determining people's health. To develop a healthy living environment, focus must be given to developing supportive housing that fit the needs of all population groups. Belfast Healthy Cities therefore welcomes the Plan Strategy's intention to support a mix of housing tenures and sizes in housing developments on sites greater than 0.1ha or containing 5 or more dwellings. Such a policy would contribute to a spatial deconcentration of poverty within the city and a more adequate supply of suitable homes for different population groups including families, singles and the elderly. The proposed guidelines around making every new home accessible and adaptable to future population needs is both ambitious and laudable. This is particularly important in relation to meeting SDG 11 Make cities and human settlements inclusive, safe, resilient and sustainable.
However, the plan fails to enforce rigorously a mix of housing sizes for single apartment developments. Since such housing developments are most likely to occur in the city centre, it will be difficult to provide a proper housing mix in the city centre. Based on the abundance of 1 and 2 bedroom apartments in the current city centre apartment developments such a lack of housing mix would be particularly detrimental to families wanting to live in the city centre.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
Include enforcement measures that make sure that developers include family friendly dwellings (e.g. 3 or more bedrooms) in single apartment developments.

Files should be no more than 10MB and in either PDF or Microsoft Word format:
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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Second Submission

Q14b. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:
Section 7.2 Urban Design

Policy (if relevant):

Q15b. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

Q16b. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
Neighbourhoods are the heart of the city, in that they define communities and shape people's everyday lives. To develop a liveable and optimally functioning city, the development of supportive and resilient neighbourhoods that have good services, meeting places and public realm that are accessible to its residents must be prioritised. WHO Europe believes that 'resilient communities respond proactively to new or adverse situations, prepare for economic change and deal better with crisis and hardship' (Health 2020 A European policy framework supporting action across government and society for health and well-being, 2013, WHO Regional Office for Europe). Appropriate access to a wide range of services for all residents plays an important role in achieving a resilient community.

The challenge for Belfast is that making the city accessible and connected is not just about building more roads but looking at ways in which to develop a transport traffic network that integrates a variety of different modes of transport without prioritising the car. Good accessible and connecting public transport links, alongside active travel networks are essential to support a healthy, sustainable and liveable city, in particular to support the mobility of younger and older people and allow everyone to make full use of the city. Promoting accessible and active travel is a priority for members of the World Health Organization (WHO) European Healthy Cities Network and supports the delivery of SDG 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; SDG 11 - Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 1 - End poverty in all its forms everywhere. A quality built environment that caters for different modes of transport is a key feature of a flourishing and confident city and can help tackle deprivation. A large proportion of jobseekers in Belfast do not have access to their own car highlighting the very necessary role of a good transport system in supporting people to gain and remain in employment. Poverty is linked to increased vulnerability to high levels of economic stress, poor housing, and unemployment. People living in poverty often have limited access to essential services, while living conditions and social factors may discourage healthy lifestyles. This in turn accelerates and intensifies the negative impact on health (Dahlgren, G and Whitehead, M, 2007, European strategies for tackling social inequities in health: Levelling up: Part 2 WHO Collaborating Centre for Policy Research on the social determinants of health).

In order to develop an equitable city, focus must be given to developing supportive and resilient neighbourhoods that have equal access to good services. Good accessible and connecting public transport links, alongside active travel networks are essential to support a healthy, sustainable and liveable city, in particular to support the mobility of younger and older people and allow everyone to make full use of the city. WHO Europe believes that 'resilient communities respond proactively to new or adverse situations, prepare for economic change and deal better with crisis and hardship' (Health 2020: A European policy framework supporting action across government and society for health and well-being, 2013, WHO Regional Office for Europe).

Belfast has excellent potential as a Walking City. Walking is available to most people, regardless of income, and is also a relevant option for many older people and people with disabilities. In addition, evidence shows regular walking is perhaps the best way to improve overall health, while it, reduces demand for transport at peak times and promotes an increased level of engagement within the city. Further evidence suggests that walkability could also be a powerful asset for developing city centre living. Increased pedestrian provision has also been shown to boost retail turnover. Research in London shows that, when people walk to local shops, they shop more frequently; carrying smaller amounts and ultimately spend more money in their local centres. People who drive to shop may spend more per trip, but come to the city less often and overall they spend less time and money in their local community (Making Walking Count: an international survey tool to understand walkers' needs in their local neighbourhoods). Work undertaken by Belfast healthy Cities with older people concluded that they wanted to use the city centre more regularly but identified barriers such as poor transport, lack of facilities in the city centre and the need for more seating. Both these examples suggest that people at both ends of the life course want to use the centre, know what they need from the centre and could be attracted to the centre with the provision of the right services.

While we commend the Plan Strategy for its guiding urban design principles that encourage the development of walkable streetscapes that aim to reclaim the city for pedestrian and cycling uses, more could be done to encourage age-friendly and child friendly design of the city. Children's and elderly people's lives are primarily local. Age-friendly and child friendly places prioritise walking and cycling infrastructure and public transport routes, to improve access to services and their opportunities for independent mobility. A degree of independence is important for children's and elderly people's confidence and their healthy development.

Accessible, walkable environments that support children's everyday lives also recognise children as a major population group in society, and enable and encourage them to contribute positively to their local environment and community. A report by ARUP – Cities Alive: designing for urban childhood – emphasises the economic benefits of attracting more families to the city centre by including child-friendly features in public realm.

In addition, the Plan Strategy does not put in place any specific policy regarding access routes to schools, which is a major missed opportunity for encouraging active travel among children. Similarly, little attention is given to the linking up of schools with other facilities that are important in children development such as sports and other clubs, leisure centres and libraries.

Q17b. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
• A clear mobility hierarchy giving priority to walking and cycling infrastructure around schools;
• New development should integrate walking and cycling infrastructure and access to public transport within 800 metres (10 min walk); for major developments s this should be 400m (5 min walk);
• Development of orbital public transport links, exploring a range of delivery options including community transport;
• Highlighting the negative impact of air pollution on children in policies on environmental change;
• Policies supporting access to employment sites from surrounding areas, in particular to augment policy EC3 and EC6;
•More explicit acknowledgement of children and young people as a key population and stakeholder group that can shape their local environment and enhance their well-being Engagement with children in Belfast shows there are three key elements to child friendly places in Belfast: better access to parks, more local open spaces children feel welcome to play in, and safer streets (Shaping healthier neighbourhoods for children, 2012, Belfast Healthy Cities).

• Adoption of child friendly design criteria as part of urban design principles

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Q18b. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Third Submission

Q14c. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::
Section 7.3 Residential Design

Policy (if relevant):

Q15c. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

Q16c. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
Good accessible and connecting public transport links, alongside active travel networks are essential to support a healthy, sustainable and liveable city, in particular to support the mobility of younger and older people and allow everyone to make full use of the city. Promoting accessible and active travel is a priority for members of the World Health Organization (WHO) European Healthy Cities Network and supports the delivery of SDG 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; SDG 11 - Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 1 - End poverty in all its forms everywhere. A quality built environment that caters for different modes of transport is a key feature of a flourishing and confident city and can help tackle deprivation. A large proportion of jobseekers in Belfast do not have access to their own car highlighting the very necessary role of a good transport system in supporting people to gain and remain in employment. Poverty is linked to increased vulnerability to high levels of economic stress, poor housing, and unemployment. People living in poverty often have limited access to essential services, while living conditions and social factors may discourage healthy lifestyles. This in turn accelerates and intensifies the negative impact on health.
Although the plan states that any residential development should be accessible and convenient to public transport and walking and cycling infrastructure, it does not quantify what sufficient access means. This leaves the policy open to interpretation by developers and planners alike.

Q17c. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
New residential development should have sufficient access to public transport (within 800 metres - 10 min walk.

Files should be no more than 10MB and in either PDF or Microsoft Word format:
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Q18c. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fourth Submission

Q14d. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::
Section 7.6 Promoting Healthy Communities

Policy (if relevant):

Q15d. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE3 - There are clear mechanisms for implementation and monitoring

Q16d. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
While Belfast Healthy Cities appreciates the inclusion of the HC1 policy that specifically calls for health and wellbeing as a crucial consideration of any development, accountable mechanisms for assessing the need for health and wellbeing improvement are lacking in the policy, particularly in relation to major developments that are likely to have an impact on health outcomes of surrounding communities. Also, major development bear the potential for reinforcing existing health inequalities across the city, particularly when it comes to blocking access to health facilities, green and blue spaces and everyday facilities such as retail.

Q17d. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
Extend policy HC1 to include a Health Impact Assessment for major developments.

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Q18d. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fifth Submission

Q14e. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:
Section 7.7 Community Infrastructure

Policy (if relevant):

Q15e. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16e. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
Leaving no one behind is the core theme of the SDG 1 - End poverty in all its forms everywhere and SDG 11 - Make cities and human settlements inclusive, safe, resilient and sustainable. The same theme is re-emphasised in the UN New Urban Agenda, which commits member states to sustainable urban development following its adoption at the UN General Assembly in December 2016. Creating a city that can support everyone is also at the heart of the 100 Resilient Cities initiative, which Belfast joined in 2016. The Programme for Government provides an agenda to strengthen wellbeing for everyone across Northern Ireland, and also provides a concrete way to link the SDGs to regional and local initiatives.

There is, in other words, a strong and growing global movement focusing on inclusive, sustainable and resilient cities, where everyone is able to lead active and fulfilling lives. 'Leaving no one behind' is its ambitious and powerful call to action, which also stresses that reducing inequalities is a key element of an inclusive and successful 21st century city. For Belfast, the Belfast Local Development Plan Strategy is an important opportunity to localise this global agenda, and set a direction that will begin to address the long standing, complex and persistent inequalities blighting the lives of too many people and communities.

Complex spatial, social, economic and political factors affect health outcomes in local communities. There is a social gradient in health; health is progressively better the higher the socioeconomic position of people and communities. It is important to design policies that act across the whole gradient and to address the people at the bottom of the social gradient and the people who are most vulnerable. Persistent poverty is a major cause of ill health and inequalities. People on low incomes and in lower social groups often have limited access to essential services, while living conditions and social factors may discourage healthy lifestyles. This in turn accelerates and intensifies the negative impact on health (Dahlgren, G and Whitehead, M, 2007, European strategies for tackling social inequities in health: Levelling up: Part 2, WHO Collaborating Centre for Policy Research on the social determinants of health).

In order to develop an equitable city, focus must be given to developing supportive and resilient neighbourhoods that have equal access to good services. Good accessible and connecting public transport links, alongside active travel networks are essential to support a healthy, sustainable and liveable city, in particular to support the mobility of younger and older people and allow everyone to make full use of the city. WHO Europe believes that 'resilient communities respond proactively to new or adverse situations, prepare for economic change and deal better with crisis and hardship.'

Belfast Healthy Cities welcomes that policy CI1 states that community infrastructure should be in an accessible location and convenient to reach by public transport or walking and cycling infrastructure. However, the policy does not quantify what sufficient access means. This leaves the policy open to interpretation by developers and planners alike.

Q17e. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
Community Infrastructure should have sufficient access to public transport (within 400 metres - 5 min walk);

Adoption of Health Equity Tool for determining positive impact of new community facilities on reducing healthy inequalities. The Health Equity Tool is an one-page tool that was developed with representatives from different organizations to help explore the potential effects of policy and proposals on inequalities in local communities. The tool can be used to screen policies, strategies, plans and commissioning frameworks against the potential effects of the inequalities.

Files should be no more than 10MB and in either PDF or Microsoft Word format:
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Q18e. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Sixth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:
Section 8.1 Inclusive Economic Growth

Policy (if relevant):

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C2 - Did the council take account of its Community Plan?, CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
Many parts of Belfast unfortunately remain untouched by recent economic growth' and there is much evidence that this is because wealth tends to be unequally distributed. Jobs need to be created across skill levels in a variety of sectors. Progression options and opportunities are important to motivate people to take up employment and develop new skills. Creating new jobs in the middle skill levels and sectors offers a way to do this, while also driving movement in the job market. It also helps avert the economic risks and widening inequalities associated with a job market divided between low skilled, low paid jobs at one end, and highly paid expert jobs at the other.

New approaches to education and training are needed to engage people. Belfast has a strong third level education sector, but in many parts of the city young people do not progress to this level. SDG 1 - End poverty in all its forms everywhere highlights that social and practical support is essential to enable people and families to take up work in a sustainable way that reduces poverty and inequality. For adults, practical support such as childcare and transport increase their ability to participate in training and sustain employment. People living in poverty often have limited physical and digital access to employment opportunities. Access to appropriate support and care is therefore an element of enabling employment, and is particularly important to enable people with disabilities, mental health issues and long term conditions to find sustainable and meaningful jobs.

In the Review of Social Determinants and the Health Divide in the WHO European Region, Michael Marmot noted the issue of youth unemployment is a public health crisis in the making. His comments recognise the long established evidence that worklessness impacts directly on health. He observes that while the most immediate consequences are an increased risk of depression and suicide, there are longer term increased occurrences of chronic conditions such as cancer, heart disease and stroke (Review of social determinants and the health divide in the WHO European Region: final report, 2013, WHO Regional Office for Europe). He warns that action to tackle the issue needs to be taken now if we are to avoid an epidemic of these conditions amongst today's young unemployed as they age.

While the Belfast Agenda focusses on improved access to skilled employment for deprived communities through skills development and support for social economy, it is not clear how the Local Development Plan Strategy responds to this aim. The plan seems to rely on a 'trickle down' economic model, with most of the employment opportunities foreseen to be created in business sectors that require a high skill level, such as ICT and digital services.

In order to develop Belfast as a more equitable city, priority the development of adequate physical access routes to major and strategic employment sites, such as the city centre, and higher and further education institutions should be prioritised. Good quality and accessible public transport links alongside active travel networks are essential to support a population that is economically more resilient, in particular by supporting the skilling up of younger and older people. WHO Europe believes that 'resilient communities respond proactively to new or adverse situations, prepare for economic change and deal better with crisis and hardship' (Health 2020: A European policy framework supporting action across government and society for health and well-being, 2013, WHO Regional Office for Europe).

In order to develop a sustainable work environment in the city centre, focus must be given to encouraging the development of mixed office/residential schemes. Such schemes would allow an increase in housing units in the city centre and promote walking and cycling as transport modes for travelling to work. This is particularly important in relation to meeting SDG 11 Make cities and human settlements inclusive, safe, resilient and sustainable. Policy EC6 does not mention the inclusion of additional functions, such as residential use, as part of office development in the city centre.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
• Policies supporting access to employment sites from surrounding areas, in particular to augment policy EC3 and EC6;
• Identifying and building on facilities for skills development within neighbourhoods that can support locally appropriate employment opportunities to complement policy EC7;
• Strengthening policy EC6 in relation to supporting mixed office/residential development in the city centre.

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Seventh Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::
Section 9.4 Transportation

Policy (if relevant):

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
Reducing car traffic and promoting active travel are key priorities for the World Health Organization (WHO, as expressed in SDG 3 - Ensure healthy lives and promote well-being for all at all ages, which highlights the positive health outcomes of reduced amounts of motorised traffic. A reduction in deaths and illnesses as a result of lower levels of air pollution is a major positive health outcome, while a reduction in deaths and injuries from road traffic accidents can also be achieved. A recent report states that almost 9% of deaths worldwide were attributable to air pollution, making it the fifth most likely cause of a preventable death (2017 Global Burden of Disease Study). The adverse health effects of air pollution are particularly evident in children's development (Air pollution and child health: prescribing clean air, WHO, October 2018).

Belfast has excellent potential as a city that is facilitating active forms of travel. Walking is available to most people, regardless of income, and is also a relevant option for many older people and people with disabilities. In addition, evidence shows regular walking is perhaps the best way to improve overall health, while it, reduces demand for transport at peak times and promotes an increased level of engagement within the city.
Further evidence suggests that walkability could also be a powerful asset for developing city centre living. Increased pedestrian provision has also been shown to boost retail turnover. Research in London shows that, when people walk to local shops, they shop more frequently; carrying smaller amounts and ultimately spend more money in their local centres. People who drive to shop may spend more per trip, but come to the city less often and overall they spend less time and money in their local community (Making Walking Count: an international survey tool to understand walkers' needs in their local neighbourhoods).

Belfast Healthy Cities therefore applauds the focus that the Plan places on encouraging active forms of travel in major developments and pedestrian accessibility for public buildings. However, by limiting pedestrian and bicycle friendly environments to major developments and public buildings only, the immediate living environment of the average citizen won't be improved much in terms of walkability and cyclability. This is an particularly important issue for children's and elderly people, whose lives are primarily local. Age-friendly and child friendly places prioritise walking and cycling infrastructure and public transport routes, to improve access to services and their opportunities for independent mobility. A degree of independence is important for children's and elderly people's confidence and their healthy development.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
Policy TRAN 1 to apply to ALL developments;
Policy TRAN 2 to apply to arterial routes in addition to public buildings and education/employment purposes.

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Eighth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:
Section 9.5 Environmental resilience

Policy (if relevant):

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE3 - There are clear mechanisms for implementation and monitoring

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
The World Health Organization places a lot of emphasis on the encouragement of sustainable forms of energy, transport and consumption patterns through SDG 7 - Ensure access to affordable, reliable, sustainable and modern energy for all; SDG 11 - Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 12 - Ensure sustainable consumption and production patterns, which all help to combat the negative health effects of climate change.

Belfast healthy Cities therefore welcomes the Plan's inclusion of policy that seeks to encourage sustainable forms of urban and architectural design including sustainable drainage systems, green roofs and others. However, such design measures should be more actively promoted as part of the development process in order to avoid the application of standard hard surface materials as default option for developers. Certain planning exemptions for example could be offered in return for the inclusion of green roofs, swales and other sustainable urban and architectural design features.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
More active promotion of sustainable design measures; e.g. planning exemptions on housing/office policies in return for the inclusion of green roofs, swales and other sustainable urban and architectural design features.

Files should be no more than 10MB and in either PDF or Microsoft Word format:
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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Ninth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:
Section 10.1 Open Space

Policy (if relevant):

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:
Strengthening connectivity and increasing green space are particularly important in creating a city that is people centred and welcoming for all ages. Green spaces offer multiple benefits, including health benefits such as stress relief and physical activity, but also offer important meeting places for people. There is also evidence that proximity to green space increases property values and can enhance productivity among workers. They can also present the opportunity to consider culture, tradition and identity in the city.

Belfast healthy Cities welcomes the Plan's inclusion of a range of policies that seek to link up existing blue and green infrastructure and promote open space standards for new developments. However, the Plan could do more to promote equal access to existing and future green spaces to all residents, including those living in inner city neighbourhoods, by adopting more specific standards for access to open space. Also, while policy GB1 is laudable, it should be much more specific when it comes to demanding the incorporation of green infrastructure features in new developments.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:
• Standards for access to open space should be introduced and implemented: ancillary open space should be available within 400m or 5 minute walk from homes, whereas open spaces should be available within 800m or 10 minutes walk from homes;
• Green infrastructure features should be included in developments of 300 units or more, or compromising 15 hectares or more.

Files should be no more than 10MB and in either PDF or Microsoft Word format:
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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

No

9. Type of Procedure

Q18. Please indicate if you would like your representation to be dealt with by:

Written representations