



# Belfast Local Development Plan

**Sustainability Appraisal** of the Draft Plan Strategy 2035  
Incorporating Strategic Environmental Assessment

**Non-technical Summary** August 2018

[www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)



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## 1. Sustainability Appraisal

- 1.1 Sustainability Appraisal (SA) is a statutory process incorporating the requirements of the EU Strategic Environmental Assessment Directive, and is being carried out alongside development of the **Belfast Local Development Plan**.
- 1.2 It is a systematic process for appraising the plan against a set of sustainability objectives to identify the relative social, economic and environmental performance of possible strategic, policy and site options, and to evaluate which of these may be more sustainable.
- 1.3 The SA allows us to show how we have assessed reasonable alternatives and any likely significant effects they may have if the plan is implemented. It clarifies how these have been taken into account in the decision making process, and highlights any changes to policies, proposals and mitigation measures that have been made as a result of the SA.

## 2. The Belfast Local Development Plan

- 2.1 The Local Development Plan (LDP) will provide a planning strategy for the council area, and will be fundamental in the council's efforts to deliver sustainable development that reflects the vision and aspiration of local communities.
- 2.2 The primary purpose and scope of the plan is to:
- ▶ Establish the strategic spatial strategy;
  - ▶ Allocate sites to meet the city's development needs between 2020 and 2035; and
  - ▶ Set development management policies against which individual proposals can be assessed.
- 2.3 The **Draft Plan Strategy** is the first of two formal documents that make up the LDP, which sets out the strategic policy framework for the plan area across a range of topics. Following its adoption, we will prepare, publish and adopt the **Local Policies Plan**.

### 3. The Sustainability Appraisal Report

3.1 The purpose of this Sustainability Appraisal Report is to present an integrated Sustainability Appraisal (SA), incorporating a Strategic Environmental Assessment (SEA), of the Draft Plan Strategy. Where reference is made to SA throughout the report, it denotes SA incorporating the SEA requirements.

3.2 The key aims and principles of SA are to:

- ▶ Make the LDP more sustainable and responsive to its social, economic and environmental effects;
- ▶ Identify key issues, significant impacts and ways to minimise any negative effects;
- ▶ Eliminate or 'scope out' insignificant effects;
- ▶ Influence alternatives and mitigation measures;
- ▶ Provide an early and effective opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process; and
- ▶ Document the story of the LDP preparation.

3.3 The SA Report contains:

- ▶ An outline of the contents and main objectives of the LDP and its relationship with other plans, programmes and strategies;
- ▶ The current state of the environment and key sustainability issues for the plan area;
- ▶ The SA Framework against which the Draft Plan Strategy has been appraised;
- ▶ An appraisal of options and reasonable alternatives;
- ▶ An explanation of the likely significant effects of the Draft Plan Strategy;
- ▶ The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects which may arise as a result of the plan;
- ▶ A description of the measures envisaged for monitoring; and
- ▶ The next steps for the SA.

3.4 **Figure 1** on the next page shows the stages of the LDP and where the sustainability appraisal is carried out.

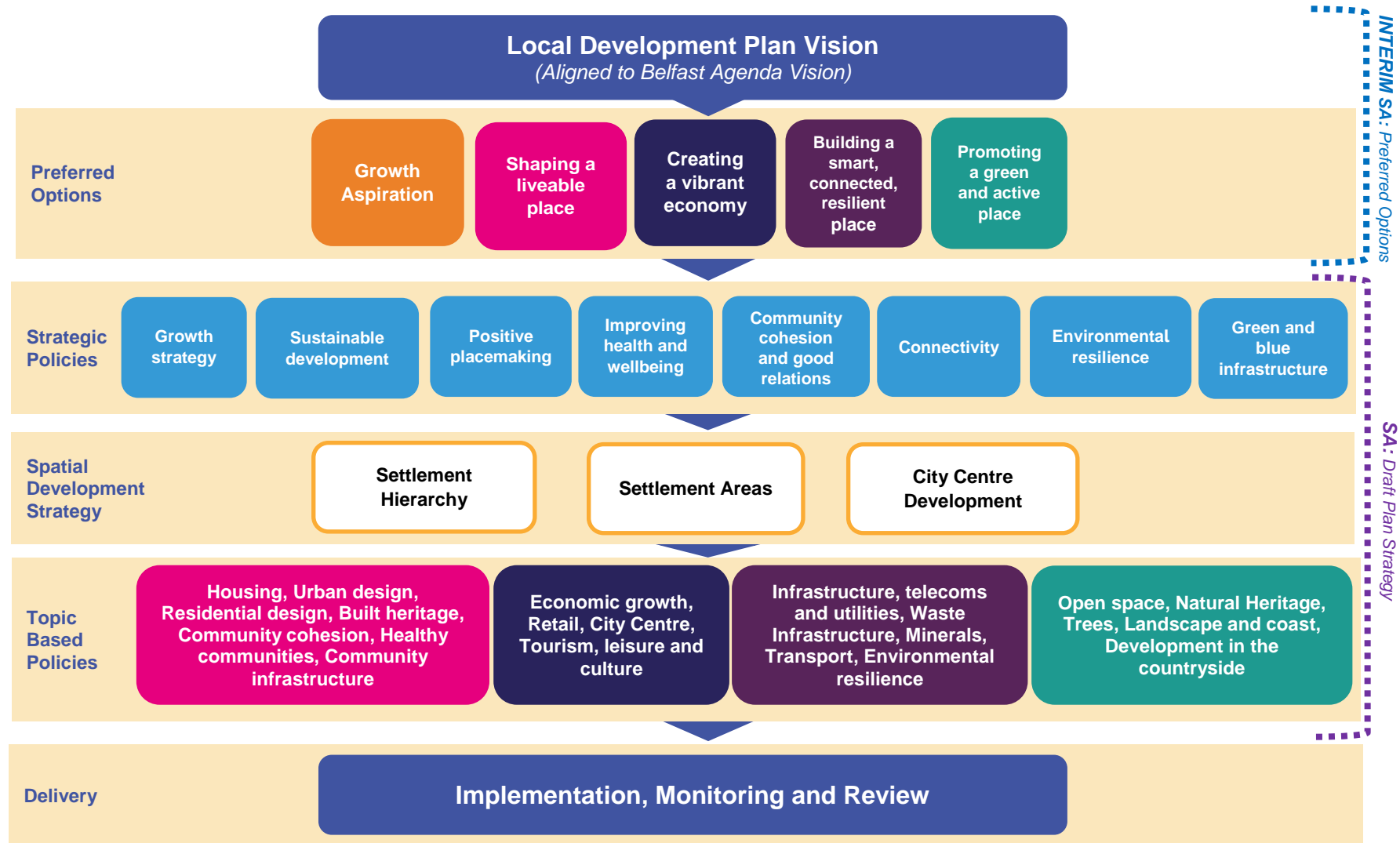


Figure 1: Appraisal Stages of the Draft Plan Strategy

## 4. Scoping

4.1 The SA **Scoping Report** was prepared and submitted for consultation in November 2016. This set out the intended scope and level of detail to be included in the SA Report and focussed on the key issues that the LDP should address or potentially affect by:

- ▶ Review of relevant policies, plans and programmes (PPP) ;
- ▶ Presenting current baseline information; Identifying sustainability objectives, opportunities and challenges;
- ▶ Assessing the likely evolution of existing conditions without the LDP; and
- ▶ Establishing a SA Framework of objectives against which the LDP could be appraised.

4.2 Following the consultation process, the Scoping Report was updated to take account of the responses received,

and as we move through the plan-making process it will be updated at each relevant stage.

4.3 **Table 1** presents a high level summary of the PPP review. This focusses on some of the key examples at each level; what those documents say that the LDP should or must do; and how the review has directly influenced both the LDP and SA. A full detailed list of all PPP's relevant to the Belfast LDP is presented as an appendix to the main SA Report.

4.4 **Table 2** presents a summary of the key sustainability issues identified from the baseline information, together with the likely evolution of each issue in the absence of the LDP.

4.5 **Table 3** identifies the 19 SA objectives that make up the SA Framework, and clarifies from which theme and SEA topic they have originated.



Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
<b>INTERNATIONAL &amp; EUROPEAN LEVEL</b>		
SEA Directive	Provide for high level of environmental protection and integrate environmental considerations into the preparation and adoption of LDP with a view of promoting sustainable development.	The SEA Directive must be applied to the preparation of the LDP. Specific requirements of the Directive must also be met through the SA.
Habitats Directive	Promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements; conservation of natural habitats; and maintain landscape features of importance of wildlife and fauna.	The LDP should take account of the Habitats Directive. Specific SA objectives should be included to protect and maintain the natural environment and important habitats.
Europe 2020 Strategy	The European Union's 10 year jobs and growth strategy; launched in 2010 to create the conditions for smart, sustainable and inclusive growth. Includes 5 headline targets for the EU to achieve by 2020.	The council should take account of the 5 headline targets when preparing the LDP.
<b>NATIONAL LEVEL</b>		
The Planning Act (Northern Ireland) 2011	Formulation and co-ordination of policy securing the orderly and consistent development of land, and the planning of the development.	The LDP must adhere to the legislation set out by the Planning Act.
Regional Development Strategy 2035 (RDS)	Aims to take account of the economic ambitions and needs of the region, and put in place spatial planning, transport and housing priorities that will support and meet the aspirations of the region.	The LDP should take into consideration and reflect the relevant policies contained within the RDS.
Strategic Planning Policy Statement (SPPS)	Sets out the Department's regional planning policies for securing the orderly and consistent development of land.	The provisions and core principles of the SPPS must be taken into account and reflected in the preparation of the LDP.

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
N.I. Sustainability Development Strategy	Framework to respond to major threats such as climate change and energy price instability, encouraging integrated action to tackle problems and take advantage of opportunities.	The LDP should take the strategy into consideration by promoting sustainable development whilst identifying and addressing issues and maximising opportunity.
<b>LOCAL LEVEL</b>		
Belfast Metropolitan Area Plan 2015	Although formally adopted in 2014, this process of final BMAP adoption was declared unlawful as a result of a judgement in the court of appeal delivered on 18 May 2017. This means the Belfast Urban Area Plan (BUAP) 2001 and the other Development Plans provides the statutory plan context for the area. However BUAP was published in 1990, nearly 30 years ago. The Belfast City Council Plan Area has undergone massive transformation since then, particularly in the city centre. The formal development plans which apply are dated and silent on many of the planning issues pertinent to needs of current planning decision making. In recognition of this unique circumstance and taking account of the short term transitional period in advance of the adoption of the Local Policies Plan it is important to provide clarity in relation to the application of planning policy.	Draft BMAP, in its most recent, post-examination form remains a significant material consideration in future planning decisions. It was at the most advanced stage possible prior to formal adoption. Draft BMAP referred to throughout this document therefore refers to that version. However, in preparing this document the council has also had regard to the provisions of the draft BMAP which was published in 2004, the objections which were raised as part of that plan process and the Planning Appeals Commission Inquiry report.
Belfast Agenda	The community plan for Belfast, created in partnership with key city partners, residents and community organisations. The plan sets out medium and long term goals for social, economic and environmental improvements for Belfast over the next 15 years.	The LDP should provide the spatial reflection of the Community Plan and establish a coherent, joint vision for Belfast that will shape development and growth of the city over the next 15 years. The LDP preparation must therefore take full account of the Community Plan. This is explained below in more detail.
Belfast City Centre Regeneration	Strategy to ensure maximum economic and social impact.	The LDP should promote the underlying and core principles of the strategy.

Plan, Policy or Programme	Objectives or Requirements	Implications for the LDP
Investment Strategy		
Belfast Integrated Tourism Strategy	Aims to achieve the ambition and aspiration to make Belfast a world class, must-visit, city destination.	The LDP should promote Belfast as a tourist destination through its strategies and policies.
Belfast Integrated Economic Strategy	Sets out the key strategic aspirations and priorities for Belfast City Council, Invest NI and its partners.	The LDP should enable economic growth and prosperity of the city council area through its strategies and policies.

**Table 1: High Level Plan, Policy & Programme Review**

Themes	Key Sustainability Issues	Likely Evolution without the LDP
<b>Population &amp; Human Health</b>	Approx. 45% of Belfast’s population live in deprived areas, with life expectancy lower than the N.I. average. Health inequalities are evident, with high deaths rates due to obesity. Segregation via peace walls heavily restricts expansion and connectivity.	The Belfast Agenda identifies health as a priority and could potentially coordinate programmes to address these inequalities, whilst the Department of Communities ‘Neighbourhood Renewal’ scheme will continue to address deprivation and local issues. Likewise regional and local programmes may seek to address health disparities across the city, however without the LDP and supporting evidence, current trends could continue to worsen and it would not be possible for the council to fully understand and plan positively for the city’s spatial and development needs. In terms of segregation the NI Executive set ambitious targets to reduce and remove all interface barriers by 2023. Without the LDP, an updated evidence base and supporting policy would be absent to assist the removal of barriers to create shared spaces and maximise accessibility of all areas within communities. There would also be a potential lack of collaborated approaches to integrate regeneration of wider neighbourhood environments, and sustainable modes of transport within land use development.
<b>Housing</b>	There is a shortage of social housing schemes to meet demand. Accommodating growth requires suitable and affordable house types, in the right locations, to meet differing needs.	Without an up-to-date housing policy to accommodate local growth, it may not be possible to meet demand for identified annual housing supply, or satisfy local requirements for housing type; including affordable housing. The location of suitable housing lands may not correlate to clear areas of housing stress, whilst there would be no mechanism to address the demands of population need, including an aging population, to ensure people have the opportunity to live in houses that address particular need.
<b>Crime</b>	A third of N.I. recorded crime offences in 2014 occurred in Belfast, with higher anti-social behaviour in Belfast than any other council area.	Existing policies and community safety initiatives from other statutory providers will continue to provide interventions to reduce crime. SPSS also provides guidance in supporting good design and positive placemaking. However without spatial, strategic direction through the LDP, current trends could continue or worsen.
<b>Open Space</b>	There is a disparity in the provision of open space across Belfast, with low levels of open and green space in the city centre.	SPSS and PPS8 would still prevail in terms of open space protection, however SPSS requires an Open Space Strategy to be undertaken specifically through the LDP. Without this the uneven distribution of

Themes	Key Sustainability Issues	Likely Evolution without the LDP
		open space may not be adequately addressed, with a significant lack of city centre open space and various other areas throughout the city lacking in accessible, open space.
<b>Education</b>	The 2011 census outlined that 41% of the adult population have no formal qualifications which decreases chances of employability.	Other statutory providers will continue to invest in employability and skills of the population through interventions such as the Council's Skills and Employability Framework. However, without the LDP there may be insufficient economic and employment land to provide locations for entrepreneurs or attract inward investment to establish Belfast as the regional economic driver.
<b>Employment</b>	30% of Belfast's working age population are economically inactive who are not looking or available for work. Half of these claim benefits.	Absence of the LDP could further disadvantage those on lower incomes in terms of access to places of work and local amenities. The LDP could also improve community connections to places of work, and zone suitable land for economic development and regeneration based on the local needs of the area.
<b>Tourism</b>	Whilst Belfast has a growing tourism economy, a number of weaknesses could inhibit and hamper economic growth– limited hotel bed space; lower than average overnight trip length and spend per night; and connectivity weaknesses between key points of interest.	Without the LDP the council would be unable to facilitate sustainable tourism growth to adequately reflect Belfast's unique needs and assets, such as opportunities to exploit the international trend towards city and business tourism; the city's capacity to become a cultural tourism destination; and expansion of water based tourism along the Lagan and canals.
<b>Transportation</b>	Regional dependency and reliance on private car travel has resulted in road traffic congestion, which has adversely impacted air quality, CO2 emissions and environmental quality. There is a clear need to integrate transportation and land use to maximise development around a quality sustainable transport network.	Regional policy such as PPS13 may address this issue to some extent, however the implementation of specific, up-to-date public transport policies would provide more certainty in relation to addressing public transport issues locally. Furthermore the Belfast Metropolitan Transport Plan is currently being reviewed, and without the LDP it would be harder to implement transport strategies in an integrated way.
<b>Retail</b>	There are high levels of vacancy rates in Belfast which reduces the retail offer and economic potential of the city centre.	The SPPS and RDS identify the need to enhance the distinctive role of the city centre as the primary retail location in NI, and regional objectives set a town centre first approach to new retail. Without the LDP there could be a reliance of market led development which can

Themes	Key Sustainability Issues	Likely Evolution without the LDP
		<p>take people out of the town centre, whilst high vacancy levels in the city centre would continue which would be detrimental to vitality and viability. The LDP would also provide an integrated framework for regeneration and development, in particular supporting investment through the Belfast City Centre Regeneration Investment Strategy.</p>
<p><b>Biodiversity, Flora &amp; Fauna</b></p>	<p>Belfast has many designated sites protected for their biodiversity and conservation importance. New development, pollution and disturbance could pose a threat to vulnerable biodiversity sites resulting in habitat loss and fragmentation.</p>	<p>This issue is being addressed to some extent as SPPS and PPS provide some protection, such as PPS2 Natural Heritage, whilst dBMAP 2015 provides local designations policy. Likewise the Belfast Local Biodiversity Action Plan 2007 (LBAP) sets local priorities for action on habitats and species. However, without the LDP sites of nature conservation would be at considerable risk given the current pressures for growth and development within the district. An up-to-date LDP would map and define sites requiring protection from obtrusive development, along with guidance on siting, scale and nature of development. This would help to conserve and enhance biodiversity and geodiversity by directing development away from sensitive locations, and managing new development so that its design minimises effects on the natural environment and helps to create and connect habitats.</p>
<p><b>Air Quality</b></p>	<p>The heavy reliance on vehicular travel leads to road traffic congestion which is having an adverse effect on air quality and CO2 emissions in Belfast.</p>	<p>Existing legislation in SPPS and PPS's seek to manage air quality to acceptable thresholds through Environmental Impact Assessment screening. However, without action from the LDP to direct development to sustainable locations and increase provision of sustainable transport infrastructure, the trend for increasing car ownership and travel is likely to continue with associated emissions of air pollutants likely to increase.</p>
<p><b>Water</b></p>	<p>All water bodies within the River Lagan, tidal Lagan and inner Belfast Lough are currently failing to meet their Water Framework Directive (WFD) objectives, which is being addressed through the Living with Water Programme (LWWP) and the North-East River Basin Management Plan (NE RBMP). However, without major investment in waste water and sewage</p>	<p>The LWWP would still go ahead without the LDP but development would potentially be ad-hoc and piecemeal, as it would be difficult to coordinate development and its supporting infrastructure. Utility providers may find it difficult to plan for growth and expansion in their networks, the knock-on effects of which could result in delays and</p>

Themes	Key Sustainability Issues	Likely Evolution without the LDP
	infrastructure in Greater Belfast, it may not be possible to permit new connections that will impact significantly on an already stretched infrastructure and adversely affect the economic growth strategy for Belfast.	inability to adequately address water quality, which could contravene the WFD requirements.
<b>Contaminated Soils</b>	Belfast has significant areas of previously developed or brownfield land, with many remaining undeveloped or vacant for extended periods. This highlights concerns over potential viability for housing, which could hinder the LDP's growth aspirations.	The council and NIEA would continue to regulate the Waste and Contaminated Land (Northern Ireland) Order 1997 as much as possible, and to assess and manage land contamination through the provisions of government guidance Contaminated Land Report 11 (Model Procedures for the Management of Land Contamination).
<b>Cultural &amp; Built Heritage</b>	Belfast has a rich cultural and built heritage, which could potentially come under pressure from new development. Alongside this, some of Belfast's heritage assets are in neglect and decay.	SPPS provides protection at a regional level, alongside PPS6 and the Addendum to PPS6. However, without the LDP to coordinate protection and enhancement at a local level, sites that have not been formally designated will have limited protection and could be at risk of inappropriate development. Historic character and townscape would be at risk of erosion, and it may be difficult to protect or offer enhancements to assets on the Heritage at Risk Register. The number of sites on the register would also likely increase.
<b>Landscape</b>	The city's landscape is subject to limited statutory landscape character and countryside designations, which are under increasing pressure from development and the intrusion of urbanising elements.	SPPS provides some protection, and is supported by PPS2 and PPS21. Without the LDP however, local sites unique to Belfast may have limited protection, such as Geodiversity sites.
<b>Waste</b>	Challenges in managing and accounting for all waste stream means the council may not achieve regional landfill obligations, with increasing pressure to deliver recycling targets set by the N.I. Executive and Europe.	European and Regional targets are set to incrementally reduce waste and encourage recycling in the city, therefore the LDP may not have much impact. The council will still explore opportunities for further waste reduction and innovative solutions.



Themes	Key Sustainability Issues	Likely Evolution without the LDP
<b>Climate Change</b>	Belfast still relies on fossil fuels which contribute to rising greenhouse gas emissions and poor air quality. These are increasing global temperatures, giving rise to more intense rainfalls and sea levels, consequently leading to a significant threat of flooding.	The NI Climate Change Adaptation Programme will continue to provide strategic objectives on climate change and adaptation. The Climate Change Risk Assessment will continue as the statutory requirement of the UK Climate Change Act, published every 5 years, whilst cross departmental action is reviewed on an annual basis to ensure greenhouse gas reduction targets are met via the Cross Departmental Working Group on Climate Change. Nonetheless, without the LPD the current and projected flood risk trend is likely to continue, the impact magnitude and extent of which may also increase. Positive management is required, with a local response to sequentially allocate sites for development avoiding the highest risk areas as a first principle.
<b>Renewable Energy</b>	The lack of renewable energy interventions could pose a risk to energy security in Belfast and make us less competitive in the global market.	The existing PPS18 was a reactive policy formulated in 2009 that requires minor changes in relation to renewable energy generation and promotion. However, targets for renewable energy consumption are outlined in the draft Programme for Government (40% of energy from renewable source and 10% heat from renewable source) and without the LDP, a strategic framework to deliver these would be absent through the planning system.

**Table 2 Key Current Sustainability Issues**



Theme	SEA Topic	SA Objective
SOCIAL	Population	1. Reduce deprivation & encourage an inclusive & equal society
	Population Human Health	2. Improve health & wellbeing for an improved quality of life
	Population	3. To provide opportunity for good quality housing & enable people to meet their housing needs
	Population	4. Increase community safety by supporting the reduction of crime & antisocial behaviour
	Population	5. To improve skills & education of residents through providing high quality, accessible lifelong learning opportunities
	Population	6. Retain & enhance access to local services & facilities
ECONOMIC	Population	7. To ensure local residents have access to employment opportunities
	Population	8. Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver
	Population Air Climatic Factors	9. Promote an integrated transport system & encourage sustainable travel
ENVIRONMENTAL	Biodiversity Flora Fauna	10. Maintain & enhance biodiversity assets & protect habitats & species
	Soil	11. Protect & enhance soil quality
	Cultural Heritage (including architectural & archaeological) Material Assets	12. Protect, conserve & enhance the historic environment, heritage assets & their settings
	Landscape	13. Protect, maintain & enhance the quality of Belfast's distinctive landscape & geodiversity

Theme	SEA Topic	SA Objective
	Landscape	14. Protect & enhance open space & natural greenspace including Belfast's countryside asset
	Material Assets	15. Promote the sustainable management of waste
	Water Material Assets	16. Promote the quality, efficient use of water resources
	Air	17. Reduce air pollution & ensure continued improvements to air quality
	Climatic Factors	18. Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy
	Climatic Factors	19. Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk

**Table 3: Sustainability Framework**

## 5. Appraisal of Preferred Options Paper

- 5.1 Following the scoping stage, the council undertook an assessment of strategic options and alternatives for the LPD. These were presented in the **Preferred Options Paper** (POP) and appraised through the **Interim SA Report**.
- 5.2 A total of 98 options and alternatives were identified by closely considering the key sustainability issues, the PPP review and baseline data for Belfast; in an effort to identify how best we can deliver and achieve the LDP objectives.
- 5.3 The appraisal was carried out by scoring each option and reasonable alternative against the objectives in the SA framework, using the colour coding shown below:

--	-	?	+/-	0	+	++
Significant Negative	Minor Negative	Unknown Effect	Mixed Effects	No Effect or Relationship	Minor Positive	Significant Positive

Figure 2: Assessment Scoring – Symbols & Colour Coding

- 5.4 Scoring is relative to the scale of proposals under consideration, and is determined by the significance of the effect. The detailed methodology of assessment scoring and effect significance is explained in the methodology section of the main SA Report
- 5.3 To begin with, the LPD vision and objectives were appraised to ensure sound compatibility with the SA Framework.
- 5.4 Following this the 98 options were appraised against the framework to understand the likely social, economic and environmental effects. A number of alternatives were scoped out or rejected at an early stage where they were not considered to be a 'reasonable' alternative.
- 5.5 Of the 98 options appraised, a total of 48 were taken forward as preferred options. The following boxes present a brief summary of the key findings we identified through the appraisal.

### Supporting Economic Growth

Primarily positive effects noted under social and economic objectives; with mixed, neutral, unknown and minor negatives under the environmental objectives. This reinforces the need to ensure an appropriate balance between economic growth and safeguarding the environment as advocated in the SPPS.

### Shaping a Liveable Place

Significant percentage of neutral effects; the majority of which fall within the environmental objectives, with the highest proportion within SA Objective 11 'Protect & Enhance Soil Quality'. Notable positive scoring recorded under 'Community Cohesion' and 'New Homes' options, tying in with the high level aims of the RDS 2035.

### Creating a Vibrant Economy

Mixed positive and negative effects recorded, showing primarily positive effects under social and economic objectives; against mixed, neutral, unknown and minor negatives under the environmental objectives. This again reinforces the need to ensure appropriate balance between economic growth and safeguarding the environment as per SPPS.

### Building a Smart, Connected, Resilient Place

In contrast, with the exception of a small number of unknowns, positive effects were generally noted across the Environmental Objectives, with a higher proportion of Social and Economic Objectives returning neutral effects.

### Promoting a Green & Active Place

Notable positive scoring recorded, with no negatives, unknowns or mixed results.

- 5.6 Due to the strategic nature of the POP and the lack of detail on specific site locations, it was not possible to predict likely effects for all options. Those that scored as 'uncertain' will be further appraised at later stages of the plan-making process when site specific policies and locations are allocated, such as for travellers accommodation, housing mix etc.
- 5.7 Likewise no sites have been allocated for housing at this stage, which explains uncertainty for some options, such as potential compatibility with the proposed Tall Building option.
- 5.8 Overall, the results of the interim appraisal show that the likely significant effects of the preferred options would be generally positive, with a small number of mixed effects. These results directly informed and influenced the development of our Draft Plan Strategy document.
- 5.9 Full details, including all reasoning for choosing preferred options and rejecting others, are presented in the main SA Report.

## 6. Appraisal of the Draft Plan Strategy

- 6.1 The next stage was to assess policy options and reasonable alternatives to deliver the plan's overall strategy. A total of 114 policy options were identified under the following main themes:



- 6.2 All options and alternatives were then appraised and compared to identify the likely effects, their level of significance, and the potential for mitigation measures.
- 6.3 The results were presented in detailed matrices and summary tables, which explain how reasonable alternatives were identified; how they were assessed and

compared; what the preferred options were; and why the other alternatives were rejected. These are attached as appendices to the main SA Report.

- 6.4 Overall significant positive sustainability effects are predicted to result from the Draft Plan Strategy throughout the plan term and beyond, particularly in relation to growth, housing provision, accessible travel, economy and jobs, and the vitality and viability of the city centre.
- 6.5 A small number of neutral effects have been identified in relation to integrated transport systems and sustainable travel, whilst some neutral and minor negative effects are predicted in relation to the sustainable management of waste; in particular should the ambitious growth aspirations of the plan be achieved. Nonetheless, such impacts can be minimised, mitigated and improved through suitable measures identified in the SA process, a precautionary approach to development within the plan area, and through the future delivery and implementation of other plans or strategies.

6.7 **Tables 4 to 6** on the following pages provide a summary of the likely significant effects identified through the appraisal.

6.8 **Table 7** provides a summary of the cumulative, secondary and synergistic effects appraisal of the preferred options.

6.9 **Table 8** provides a summary of reasons why alternatives were scoped out, why preferred options were selected and why others were rejected.

**Social Sustainability Objectives: SA1 – SA6**

**Likely Significant Effects – Key Findings**

**SA1: Reduce deprivation and encourage an inclusive and equal society**

The majority of the draft policies would have minor positive social effects, recognising the importance of good quality housing and building community cohesion in achieving balanced and inclusive communities, particularly in the many single identity neighbourhoods in Belfast that suffer from deprivation. These minor positives rise to significant positives as we move from the inner city, which has some of the most deprived areas, towards the more affluent outer city areas. Significant positive effects were also identified through accessible accommodation, increased employment options, community cohesion and interface uses, and a greater choice of affordable housing.

Improving wealth and economic opportunities provides significant positive effects through inclusive and accessible employment creation. A balanced approach to encouraging employment opportunities in local areas would subsequently have minor positive effects in reducing deprivation.

Improving accessibility and travel choices will have significant positives in terms of achieving a more inclusive and equal society, as would safeguarding environmental quality; specifically in inner city areas where environmental issues such as air and noise quality will be most problematic. Improving infrastructure and protecting the environment will bring minor positive benefits to society as a whole.

The Green and Blue Network would have significant positive effects as it seeks to ensure greater connectivity, accessibility and resilience. Elsewhere minor positive effects would be achieved by protecting and improving open space, and safeguarding natural heritage for the benefit of all. This will help reduce inequality and exclusion whilst also meeting community needs, including rural communities.

**SA2: Improve health and wellbeing for an improved quality of life**

Better community cohesion demonstrates the link between good residential design, deprivation, and health and well-being, which is reinforced by significant positive effects. Minor positives would be achieved through increased employment opportunities and improved housing solutions and community cohesion; all of which are critical elements in creating and maintaining a healthy, well balanced city with improved quality of life for all. Focusing retail development or services, and higher density housing, in locations that are highly accessible will also bring minor positives, and should reduce the need to travel by car, encourage the use of active travel modes etc.

Placemaking through master planning will bring significant positive effects. Shaping regeneration opportunities and improved connectivity will deliver high quality living and working environments, whilst more accessible economic and social opportunities provision in the city centre will encourage greater social interaction. All of these can promote healthy lifestyles; with direct benefits to quality of life, and physical and mental wellbeing. For the same reasons, minor positive effects would be achieved by supporting development to improve the natural and built environment, which may encourage more walking and cycling within local neighbourhood areas.

### Likely Significant Effects – Key Findings

Promoting accessibility and improved travel choices, in particular active travel, and improving environmental quality will have significant positive effects on human health. Improving infrastructure whilst protecting the environment will have minor positive effects on quality of life.

Significant positive effects would again be achieved through the Green and Blue network, together with the draft open space and trees policies; all of which seeks to ensure more active lifestyles and a high quality attractive environment that promotes wellbeing. The remaining green and active policies will generally have minor positive effects as they seek to protect and improve open space and recreation facilities for the wellbeing benefit of all.

#### SA3: To provide opportunity for good quality housing and enable people to meet their housing needs

Generally significant and minor positive effects would be achieved across the housing and residential design policies. 31,600 new homes are proposed over the plan period, with a strong focus on provision of quality housing and meeting housing need, whilst allocation of housing land will be enabled through the settlement hierarchy. It is recognised that a lack of community cohesion can be a significant barrier to housing delivery, particularly affordable housing, which can then prevent housing need from being met in specific areas of the City. However by supporting and facilitating development that improves good relations, we can help promote greater cohesion, improve relationships and provide opportunities for mixed-tenure housing in shared neighbourhoods.

Significant positive economic effects would be achieved due to high quality mixed use regeneration projects that will provide a variety of residential accommodation to meet housing need for diverse groups of people. Provision of a range of good quality housing types that can accommodate a diverse mix of need to suit demographic requirements would have minor positive effects.

Good quality housing with accessibility for all, in addition to policies that address environmental constraints and focus on the reuse of brownfield and contaminated land for housing, will also have significant positive effects.

The Green and Blue Network, together with the draft trees policies, seek to ensure access for residents to recreation and amenity spaces; which would have significant positive effects. Protecting and improving the quality of the natural environment and open space to support existing residents and new housing developments will have generally minor positive effects throughout the city.



## Likely Significant Effects – Key Findings

### SA4: Increase community safety by supporting the reduction of crime and antisocial behaviour

Good quality design and improved community cohesion would promote good relations, which can have positive social effects by helping reduce antisocial behaviour and crime in many of the existing deprived communities.

A number of the housing draft policies have uncertain effects in relation to reducing crime and ASB. This is due to the fact that the full effects will only be realised following the Local Policies Plan stage when the Plan is adopted and being implemented on the ground. Community safety can be improved by tackling the problems and inequalities of deprivation, but would be an indirect or secondary effect that is less certain.

Minor positive economic effects would be obtained by encouraging good quality design and a greater diversity of land uses. Increased economic activity can generate greater footfall and improve urban vitality; improving natural, passive surveillance which can in turn help deter anti-social behaviour and reduce crime.

Whilst the majority of policies will have a neutral effect on community safety in terms of connectivity, positive effects were identified where the promotion of careful design and improved environmental quality can increase neighbourhood safety. Likewise the encouragement of active travel routes and increased footfall would also have positive effects.

The Green and Blue Network will again have significant positive effects as it seeks to promote greater accessibility, connectivity and level of use of natural, recreation and amenity spaces. Protecting and improving the quality of the environment will create attractive, safe and inclusive neighbourhoods, which will have minor positive effects.

### SA5: To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities

Significant positive effects were noted for conversions and subdivisions, as these would facilitate increased choice of suitable accommodation for students. Likewise opening up the City's learning environments to communities historically perceived or actually excluded from educational facilities, particularly where new facilities are encouraged in accessible locations for all communities, would bring about significant positive change. Uncertain effects were identified as whilst improving community cohesion may attract some residents within deprived communities to feel more confident about accessing educational opportunities, the extent to which skills would be improved is uncertain at this stage.

Significant positive effects were identified under the policy support for third level educational facilities, which would facilitate training to improve skill levels and widen employment opportunities. Adopting a balanced approach to ensure adequate provision for lifelong education opportunities that are easily accessible by sustainable modes of transport, would result in minor positive effects.

Facilitating infrastructure, including telecommunications, which can improve access to education and skill development opportunities would also have a minor positive effect.

### Likely Significant Effects – Key Findings

#### SA6: Retain and enhance access to local services and facilities

A plan-led approach to new residential development will have significant positive effects by ensuring that locations for new housing maximise the opportunity to be located close to, and take advantage of existing services and facilities, in addition to planning for new ones. Increasing densities, sub-division of properties, and meanwhile uses in interface areas would also bring about significant positives. Designating settlements in accordance with the level of facilities and services available to serve them, and providing better targeting of various policies, such as focussing retail development or services in locations that are highly accessible, will have minor positive effects. As with SA Objective 5, improving community cohesion may attract some within deprived communities to access more local services and facilities, however, the extent to which skills would be improved remains uncertain at this stage. Likewise there are uncertain effects in relation to affordable housing as the location of new housing would only be known at LPP stage.

Significant positive effects would arise from mixed-use regeneration schemes that provide new local services and facilities to support the new population that will live and work in the city; as well as the potential to enhance a diverse range of key services in the city centre. Protecting and promoting the development of local services and facilities that are highly accessible by sustainable modes of transport would have minor positive effects.

Improving accessibility and promoting modal shift will have significant positive effects.

The Green and Blue Network seeks to promote greater accessibility and connectivity throughout the city, including to local services, which would bring about minor positive effects.

**Table 4: Key Findings for Social Objectives**

## Economic Sustainability Objectives: SA7 – SA9

### Likely Significant Effects – Key Findings

#### SA7: To ensure local residents have access to employment opportunities

Job creation, increased densities, provision of specialist residential accommodation, sub-division of properties, community cohesion and community infrastructure, and access to employment opportunities and facilities will result in significant positive effects. Minor positive effects will be achieved by ensuring greater connectivity between where people live and work. As with SA Objectives 5 and 6, the effects of improving community cohesion are uncertain, as whilst there may be improved access to local services and facilities, the extent to which skills would be improved is unknown at this stage. Likewise, as the location of new housing will not be known until LPP stage, the effects in relation to affordable housing are also uncertain.

Directing economic growth to development opportunity areas will bring significant positive effects by helping diversify land uses in the city centre, reflecting the wider economic structural changes resulting from knowledge economy growth. Integrating development areas with surrounding neighbourhoods would also ensure employment opportunities are accessible to local residents. Minor positive effects would be achieved through provision of good sustainable connections to a diverse range of employment opportunities suitable for a variety of skill sets. A variety of accessible employment creation opportunities in the City Centre would result in predominantly significant positive economic effects. Minor positive effects were noted with potential employment opportunities for local areas.

Support for improved telecommunication services will support business and an increase in employment opportunities, giving significant positive results. Improved infrastructure and accessibility across the city will generally result in minor positive or neutral effects.

The Green and Blue Network would have a minor positive effect on this objective as it seeks to promote greater accessibility and connectivity throughout the city, including to places of employment.

#### SA8: Support the economic development of Belfast as a competitive place and contribute to Belfast's roles as a regional economic driver

Significant positive effects were identified in relation to economic development; in particular residential design, community cohesion and provision of housing and affordable housing. This emphasises the importance of good design and housing in building up a skilled resident population to further economic development.

Enabling the city to compete with similar sized cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy will have minor positive effects. Likewise improving community cohesion and good relations will have city-wide benefits and help to attract inward investment from a range of business sectors, encouraging new start-ups and existing business to locate and expand in the city. Responding to wider economic structural changes through new innovation and growth of the knowledge economy can also help the city compete on a global level, which would have significant positive results. Provision of sufficient land to support a diverse range of economic development

### Likely Significant Effects – Key Findings

opportunities will strengthen Belfast position as the economic driver for the region, giving predominantly significant positive effects. Promoting sustainable inclusive economic growth, to diversify and strengthen the economy, and subsequently Belfast as the regional economic driver, will have minor positive effects. Minor positive effects would also be achieved by protecting existing economic uses. Designated as the region's Principal City by the RDS, the draft plan policies will ensure Belfast continues to function as the regional economic driver. The overall positive results for this objective are unsurprising given the plan's ambitious growth aspirations for Belfast, in accordance with the Belfast Agenda, RDS and SPPS.

Facilitating infrastructure necessary to support economic growth, improving resilience to flooding and attractiveness for investment will all bring significant positive results. A strong number of policies will also have minor positive effects on supporting economic development through infrastructure improvements and improving accessibility.

The Green and Blue Network and draft trees policy which will make the city an attractive city in which to live and work, thus bringing significant positive effects by stimulating economic growth. Elsewhere minor positive effects will be achieved through protecting and improving environmental quality; creating an attractive city which encourages economic investment.

#### SA9: Promote an integrated transport system and encourage sustainable travel

Significant positive effects have been identified through enabling better integration of land use planning and transportation through the city corridors, which should ensure greater connectivity between where people live and work. Higher densities, management of short term let accommodation, tall buildings, improved residential design and community cohesion would all have significant positive effects, as they would contribute to a more compact, populated city with balanced communities who have good access to public transport networks. The proposed population and economic development growth is likely to facilitate a well-integrated public transport system with a larger percentage of the population living closer to their place of work and to key local services and facilities, which would bring positive minor effects across the city. Uncertain effects have been noted as whilst increased community safety may encourage more people to navigate by sustainable travel means, including walking and cycling, the extent to which this policy would actively support integrated transport systems and sustainable travel is unknown. Uncertainties are also noted in respect of affordable housing and adaptable, accessible accommodation, as the locations of these homes are not known at this stage.

Supporting development to help deliver an efficient, compact city form that is served by a highly accessible integrated transport network based on public transport, cycling and walking, will result in a mixture of both significant and minor positive effects. The significant effects are likely with the city centre first retail policy approach that would enhance the opportunity for an economically viable sustainable travel network. The minor effects would stem from the same approach to economic development, which would build the critical mass to support sustainable travel and an integrated transport system.

### Likely Significant Effects – Key Findings

Support for sustainable travel will have clear significant positive effects on this objective. The draft transport policies seek to develop an integrated transport system with more sustainable travel modes, together with additional policy support to mitigate against environmental change.

The Green and Blue Network will have significant positive effects, with additional minor positives achieved by the open space and landscape policies, all of which facilitate a compact urban form and active travel. However, policies facilitating rural development may not promote sustainable transport modes in all cases.

Table 5: Key Findings for Economic Objectives

### Environmental Sustainability Objectives: SA10 – SA19

### Likely Significant Effects – Key Findings

#### SA10: Maintain and enhance biodiversity assets, and protect habitats and species

Whilst a number of draft policies would have neutral effects, policies that encourage good design, seek to protect existing open space and create new open space where necessary would all have minor positive effects. Uncertainties are noted in respect of housing mix as the location and mix of new homes are not known at this stage. Minor negative effects were identified as the pressure for growth may potentially impact on biodiversity, in particular due to increased housing and employment development pressures, even on brownfield sites.

In terms of economic issues, the draft policies would generally have no significant effect. The draft policies recognise that the protection and enhancement of the biodiversity assets, habitats and species is an important element within the context of sustainable development. The plan proposes a balanced approach to the integration of the three pillars of sustainable development (social, economic, and environmental factors), and ensuring none of these would be promoted over the other, which would result in minor positive effects. Potential pressure on biodiversity from new tourism facilities provided mixed effects, though this may be mitigated through habitat protection and enhancement. Some minor economic positives were identified under this objective from the economic policies, where development on existing sites in the city centre would be encouraged.

Implementing the Green and Blue infrastructure, which promotes habitats and biodiversity, would have significant positive effects. In contrast, the waste infrastructure has the potential to have negative effects on this objective due to the size and nature of the facilities.

### Likely Significant Effects – Key Findings

In addition to the Green and Blue Network, significant positive effects were also identified for the natural heritage and trees policies, which seek to protect and promote a connected network of natural resources and biodiversity. The remaining policies that seek to protect and improve the quality of the environment, including natural heritage, would have minor positive effects.

#### SA11: Protect and enhance soil quality

Bringing existing contaminated brownfield sites back into active use, as a result of economic growth, would have minor positive effects on soil quality. Likewise the prioritisation of brownfield sites, a windfall allowance within the urban footprint, higher densities and the protection of residential stock would all help to protect soil quality on greenfield sites and could lead to actual improvement of soil conditions on some contaminated brownfield sites. The protection of parks, gardens and demesnes, together with the active use of interface sites, would also help to protect soil quality and could also lead to contaminated sites being improved to facilitate new development. Otherwise a number of draft policies would result in neutral effects on soil quality.

A balanced approach to delivering sustainable development would have predominantly minor positive effects. In particular the promotion of brown field sites for economic development within the urban area has the potential for remediation works to improve soil conditions. Mixed effects were recorded due to potential pressure for developing greenfield sites for new tourism facilities.

Protecting the natural environment and promoting ecosystem services will generally have minor positive effects, however potential minor negative effects may also occur as landfilling can lead to soil pollution.

Significant positive effects were identified from the draft trees policy in particular, on account of their positive benefits for ecosystem services, including water quality and soil quality/stability. Protecting and improving the quality of the natural environment would generally have minor positive effects.

#### SA12: Protect, conserve and enhance the historic environment, heritage assets and their settings

Significant positive effects are identified as economic growth and increased housing growth could provide opportunities to bring disused, brownfield and heritage assets back into use, thereby enhancing streetscapes and revitalising long-standing areas of dereliction. As would be expected, the majority of the built heritage draft policies would also have significant positive effects as they which seek to protect, conserve and enhance the historic environment and heritage assets. Whilst the draft windfall policy would maximise opportunities to reuse historic buildings and preserve the historic character of streets and townscapes; there is a risk that as pressure for land increases over time, the historic environment could come under more pressure for demolition. As such this resulted in mixed effects. The remaining housing policies, relating mainly to new builds, would have neutral effect.

In proactively promoting development the city's built heritage would be protected and enhanced through the careful stewardship of the built environment, resulting in minor positive effects. A balanced approach would again ensure that none of the three pillars of sustainable

### Likely Significant Effects – Key Findings

development is promoted over the others. Retaining the built environment and promoting the refurbishment and re-use of existing buildings can also help retain the city’s distinctive character and attractiveness. However, and notwithstanding the potential to enhance a sense of place through the adaptation and reuse of historic buildings, it is noted that development pressure for new builds may result in some loss of built heritage; thus mixed effects are recorded.

The provision of essential services may have some negative impacts on the historic environment and heritage assets.

Significant positive effects were again noted for the draft trees policy due to their positive benefits for built heritage settings. Minor positive effects would also be achieved through the protection and improvement of landscape quality and the environment, which also affects the townscape quality.

#### SA13: Protect, maintain and enhance the quality of Belfast’s distinctive landscape and geodiversity

The draft built heritage policies would help protect historic buildings that contribute to Belfast’s landscape setting, and are likely to have significant positive effects. Similar effects would also be achieved through the retention of archaeology sites, conservation areas, ATC’s and parks, gardens and demesnes that contribute to landscape setting, geodiversity and historic character. Minor positive effects are also expected as the proposed growth is capable of being accommodated within the existing urban footprint, preventing pressure on sensitive landscapes and geodiversity.

Protection and enhancement of the city’s distinctive landscape setting and geodiversity is an important element within the context of sustainable development, and the balanced approach of the plan will have minor positive effects. Recognising the landscape and geodiversity as a distinctive tourism asset will also have minor positive effects.

Waste infrastructure has the potential to have minor negative effects on landscape quality due to size and nature of the facilities.

Enhancing the quality of green assets, open spaces, important landscapes and the setting of the city in general will have significant positive effects. Protecting and improving the natural environment and the countryside will have minor positive effects.

#### SA14: Protect and enhance open space and natural greenspace including Belfast’s countryside asset

The proposed design, community cohesion and interface area policies would result in minor positive effects on green space and countryside. It is also noted that provision of housing and affordable housing within the development limits, along with higher densities and a focus on brownfield development, can offset the pressure for development on green spaces and in rural areas. The presence of small settlements should ensure that rural housing need can be met without recourse to the open countryside, which would be a minor positive effect. However, whilst pressure on the countryside should be minimised, some brownfield sites that have re-colonised as green space may come under pressure to be redeveloped, which would have mixed effects.



### Likely Significant Effects – Key Findings

The city centre first policy approach focuses on existing brown field sites, and recognises that open and green spaces are an important asset, which will have a significant positive effect. Minor positive effects are also identified through the balanced approach to delivering sustainable development, which reflects the importance of protecting and enhancing open spaces, green spaces and the countryside.

Waste infrastructure again has the potential for minor negative effects on the countryside due to size and nature of the facilities.

Enhancing the quality of green assets, open spaces, important landscapes and the countryside around the city will have significant positive effects. Protecting and improving open space, the natural environment and the countryside will have minor positive effects.

#### SA15: Promote the sustainable management of waste

Significant positive effects would result from draft policies on density and residential design, as higher densities alongside well designed and integrated new housing can assist in more sustainable waste management. Whilst increased growth will lead to an increase in waste, which would have minor negative effects, minor positive effects are identified as the waste arising from the proposed growth can be accommodated within existing infrastructure.

Supporting the reduction of waste will have minor positive effects. Again whilst minor negative effects are noted as population and economic growth will increase the amount of waste generated, this can be mitigated with the reuse of existing buildings to minimise construction waste, and the provision of recycling facilities to promote a circular economy approach to reuse, recycle and minimise waste.

Facilitating an increased resource efficiency and a shift to the circular economy will have significant positive effects. This will be further supported by mitigation against environmental change, including the promotion of recycling and the circular economy.

The green and active policies generally have no effects on this objective.

#### SA16: Promote the quality, efficient use of water resources

Belfast has a healthy supply of water, so this is not considered to be an issue for growth. Similarly, the economic growth is not envisaged to include heavy industry that would require significant volumes of water usage. Supporting priority brownfield development and factoring in a windfall allowance would require less new infrastructure, and with concentration of population within the urban footprint, it is cost effective. However, there are capacity issues with the existing Waste Water Treatment (WWT) facilities in Belfast, which could prove to be a risk in the short term, and subsequently both uncertain and mixed effects are noted for this reason. Likewise whilst development could be facilitated within the existing urban footprint, the locations of interface areas are fixed and there may be infrastructure implications, so mixed effects are again identified.

For the same reasons above relating to the WWT capacity issues, effective management of infrastructure throughout the plan period will be required as development progresses to ensure quality and efficiency is maintained in the long term. Economic effects are therefore also likely to



### Likely Significant Effects – Key Findings

be mixed, in particular as an increase in economic development will produce more waste water, which could potentially exceed the existing WWT capacity if it is not managed efficiently throughout the plan period.

Facilitating infrastructure to encourage better quality and efficient use of water will have significant positive effects. This is further supported through the promotion of water quality protection and reduction of carbon emissions.

Protecting and improving the quality of the natural environment, in particular the benefits of trees for water quality, has resulted in both significant and minor positives under this objective.

#### SA17: Reduce air pollution and ensure continued improvements to air quality

The potential to address peace walls and create or renew access to neighbouring areas, in order to promote connectivity and enhance permeability, will help to reconnect the city and would have significant positive effects. The consequential benefits of this include reduced commuting distances and improved linkages between different areas, reducing the need to travel further by vehicle and encouraging travel by foot or bicycle. This would also assist in improving air quality.

Accommodating people and jobs within the city will reduce travel distances and have a minor positive effect on air quality. In addition, new economic development continues to embrace clean green technologies and is compatible with an increasingly digital economy. Better integration of land use planning and transportation through the city corridors, reducing the need to travel and encouraging more sustainable travel options, will help to reduce air pollution associated with the private car and also result in minor positive effects. Restricting uses in retail warehousing sites may help to minimise the number of car journeys.

Supporting the requirement for new development sites to be highly accessible to public transport, within easy walking and cycling distance that could help to reduce air pollution, will have minor positive effects. This also reduces emissions from less sustainable modes of transport. Increased economic development does however have the potential to increase the number of cars travelling into the city, and is therefore identified as a mixed effect. Overall however, improved accessibility and reducing the need to travel will have significant positive effects; reducing emissions and pollution to improve air quality through modal shift.

Significant positive effects are again identified for the Green and Blue Network and draft trees policy, due to their positive benefits through ecosystem services. Further minor positive effects are noted through the general protection and improvement of open space and the natural environment, which have subsequent positive effects on air quality.

## Likely Significant Effects – Key Findings

### SA18: Support mitigation efforts to reduce greenhouse gas emissions and transition to a Low Carbon Economy

Significant positive effects are identified as higher densities means more compact cities, reducing the need to travel and thereby helping to reduce emissions and support a shift to a lower carbon economy. Delivering an increased population whilst maintaining a compact urban form will ensure residents are located close to places of work, encouraging more sustainable travel modes than the private car, which will make minor positive contributions to the aim of a low carbon economy. In the absence of knowing where new housing will be located, at this stage there are uncertain effects in terms of affordable housing, housing mix and accessible/adaptable accommodation.

Significant positives are identified as comprehensive, sustainable mixed use schemes will promote working and living in the city centre, walking and cycling, and district heating from renewable energy which will support the transition to a low carbon economy. Supporting the requirement for new development sites to be highly accessible to public transport, and within easy walking and cycling distance, could help to reduce greenhouse gas emissions, thus having minor positive effects. Minimising car journeys and promotion of sustainable travel will reduce emissions, whilst supporting sustainable development will promote renewable energy and passive design solutions; reducing greenhouse gas emissions and supporting the transition to a low carbon economy. Mixed effects are noted where increased economic development may increase the number of cars travelling into the city, prompting an increase in emissions. The positive effects under this objective could be further enhanced by ensuring that new economic development can employ new technology that makes a positive contribution to the transition to a low carbon economy.

Improving accessibility and reducing the need to travel will have significant positive effects, as will facilitation of renewable energy schemes and a shift towards a circular economy.

The Green and Blue Network and trees policies will have significant positive effects due to their positive benefits through ecosystem services. Elsewhere, protection and improvement of the natural environment and encouraging more active travel will have minor positive effects on reducing greenhouse gas emissions.

### SA19: Support measures to mitigate against the impact of climate change, support action to adapt to climate change, and effectively manage flood risk

Mixed effects are noted as increased development could lead to increased risk of flooding, although this could be partially offset through use of more sustainable construction methods and flood risk mitigation. Many brownfield sites will be at flood risk and require further assessment at application stage. Also, taking windfall housing in isolation (i.e. in the absence of higher densities etc.) would mean that more development land would be required, thereby increasing flood risk. Mixed effects are again identified for these reasons. As the impact on flood risk will depend on the location of individual developments, which is unknown at present, uncertain effects are also noted.

Encouraging more energy efficient design and sustainable travel modes of travel through better integration of public transport, walking and cycling routes will have minor positive effects. This would contribute positively to climate change goals through a reduction in greenhouse gas

### Likely Significant Effects – Key Findings

emissions to help mitigate climate change. The integration of a blue and green infrastructure network would also help to mitigate potential flood risk. Policy support for sustainable economic development and enhanced connectivity may help to mitigate and adapt to climate change, bringing minor positive effects. Mixed effects were noted due to the potential for more hardstanding with greater run-off and surface water flooding. However a green and blue infrastructure network could help to mitigate the impact.

Improved accessibility and reducing the need to travel will have significant positive effects, as will promoting active travel, reducing air pollution caused by motorised traffic, encouraging environmental change and seeking to ensure a resilient city.

As with previous objectives, the positive ecosystem services benefits of the Green and Blue Network and trees policies will have significant positive effects. Minor positives will also be achieved through protecting and improving the natural environment, and promoting of active travel; all of which have positive effects on greenhouse gas emissions and climate change.

**Table 6: Key Findings for Environmental Objectives**

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<b>SOCIAL OBJECTIVES</b>		
1. Reduce deprivation and encourage an inclusive and equal society	++	The provision of quality housing, with an improved, more competitive city supported by quality infrastructure and greater employment opportunities, together with a healthy, green and active environment should help to reduce deprivation for all and promote equality in society. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be significantly positive.</b>
2. Improve health and wellbeing for an improved quality of life.	++	As for SA1, where the policies of the draft plan cumulatively would have a significant positive effect, this would improve the general health and well-being of the population for improved quality of life. Also considered to have significant positive effects. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be significantly positive.</b>
3. To provide opportunity for good quality housing & enable people to meet their housing needs	++ ↑ Increased Significance	HOU1, in setting out housing requirements, would have a significant contribution to make towards the provision of new housing over the plan period.  Aside from HOU1, which seeks the provision of 31,600 new homes to grow the city, draft policies HOU2, HOU3, HOU4, HOU5 and HOU6 in particular have the potential to create a synergistic effect; reinforcing a significant positive effect on SA Objective 3 over the lifetime of the Plan. <b>Whilst this will not change the overall score, the significance of the positive effects should increase over time as a result.</b>
4. Increase community safety by supporting the reduction of crime & antisocial behaviour	++	Community safety should be improved as a result of the DPS policies and therefore the plan would have mostly minor positive effects.  Taking policies HOU5, CGR1, CGR2 together has to potential to have a synergistic effect on SA Objective 4. The provision of good quality housing, together with enhanced good relations and the redevelopment of contested spaces, can make people happier, less fearful about crime and reduce instances of disturbance, intimidation and antisocial behaviour. <b>Such effect is considered to increase the overall cumulative effect from minor to significant positive.</b>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
5. To improve skills and education of residents through providing high quality, accessible lifelong learning opportunities	++	One of the measurements of deprivation is educational attainment. Through improved housing, provision of affordable housing, a better environment, a more liveable place, improved accessibility and more job opportunities, people would be considered more likely to avail of educational and training opportunities. Such opportunities are also likely to increase through the growth of the city, which is the foundation of the LDP. As a suite of policies therefore, the DPS would be considered to have synergistic cumulative effects in helping more people to attain the skills and education that will assist them throughout their lives. <b>The overall cumulative effect is therefore considered to increase from minor to significant positive.</b>
6. Retain & enhance access to local services & facilities	++ ↑ Increased Significance	HOU4, RD3, CGR1 and CGR2 would have a significant contribution in terms of ensuring access to local services and facilities.  Additional policies HOU3, HOU8, HOU9, HOU12, HOU13, HC1 and CI1 could create a synergistic effect, reinforcing a significant positive effect on SA Objective 6 over the lifetime of the plan. <b>Again whilst this will not change the overall score, the significance of the beneficial effects should increase over time.</b>
<b>ECONOMIC OBJECTIVES</b>		
7. To ensure local residents have access to employment opportunities: Individual issues	++ ↑ Increased Significance	Similar to SA Objective 6 above, where a policy would retain and enhance access to local services and facilities, it will also provide access to employment opportunities.  Various housing, urban design, community cohesion and community infrastructure policies, when taken together have the potential to have a synergistic positive effect on SA Objective 7. Specifically policies HOU4, HOU8, RD3, CGR1, CGR2 and CI1 will be of benefit in providing access to employment opportunities; <b>therefore the overall cumulative effect is considered to increase from minor to significant positive.</b>
	?	The Plan Strategy is promoting inclusive employment growth through the provision of a range of jobs at different skills level within defined economic sectors over the Plan Period. This is to support the Belfast's Agenda target to secure 46,000 additional jobs by 2035.  Government policy for Brexit has the potential to synergistically <b>reduce the overall effect from significant positive to unknown</b> . The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities leading to reduced inclusive employment creation.

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
		Likewise potential currency fluctuations due to Brexit may deter or reduce tourism numbers; and the levels of predicted out-of-state expenditure may not be achieved to meet the Belfast target of £500m by 2021.
7. To ensure local residents have access to employment opportunities: Consolidated issues	+	Consolidating the cumulative effects identified above for SA objective 7, and taking consideration of the specific reasons affecting each score, the cumulative effects for this sustainability issue are considered <b>to reduce from significant to minor positive</b> .
8. Support the economic development of Belfast as a competitive place & contribute to Belfast's roles as a regional economic driver	?	<p>The Draft Plan Strategy seeks to ensure sufficient land is available to support the growth of defined economic sectors. This will encourage and promote innovation and the knowledge economy, enabling Belfast to be a competitive city that attracts businesses and talent. This reflects and supports the Belfast's Agenda target to secure 46,000 additional jobs by 2035.</p> <p>Government policy for Brexit again has the potential to synergistically reduce the overall effect. The uncertainties of Brexit may erode private sector investor confidence and compromise future economic development opportunities, leading to reduced business creation and foreign direct investment.</p> <p>There is also a possible synergistic effect due to the proposed Belfast Transportation Plan which is being prepared by the Department for Infrastructure. There is a risk that this may not adequately plan for sustainable travel, and to mitigate the potential increase in private car commuting due to the LDP's proposed level of economic growth; which predicts to secure 46,000 additional jobs by 2035. This would significantly affect the ability to achieve positive effects under the objective, as demand for parking spaces may increase, which could subsequently erode available land required for economic growth.</p> <p>There is also the potential for secondary, indirect effects of increasing greenhouse gas emissions; compromising the city's ability to mitigate climate change and air pollution that would negatively impact the health of people living and working in Belfast.</p> <p>The lack of an Executive to make strategic economic decisions concerning funding for economic investment and infrastructure development may also have a significant synergistic effect on the ability to deliver the objectives and targets of both the LDP and Belfast Agenda.</p> <p><b>Given that we do not yet know the extent that these influencing factors may have on any impact, the cumulative score is concluded to be uncertain.</b></p>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
9. Promote an integrated transport system & encourage sustainable travel: Individual issues	++	The Draft Plan Strategy is considered to have an overall minor positive effect on SA objective 9. Locational aspects of housing policies including HOU4, HOU8, HOU9 and HOU12; principles within urban design policies DES1, DES2, and RD1; together with improved community cohesion and good relations (CGR1); have the potential to create a positive synergistic effect on SA Objective 9 by improving accessibility and connectivity, and encouraging greater levels of sustainable travel. <b>The overall cumulative effect is therefore considered to increase from minor to significant positive.</b>
	-	The proposed TRAN policies will have positive effects as they seek to develop an integrated transport system and more sustainable travel. However, the LDP objectives of increased growth in population and jobs in the city have the potential to create an indirect negative effective through greater demand for travel. This could neutralise the policies to facilitate and promote active travel and sustainable modes of transport, subsequently <b>reducing the effect from minor positive to minor negative.</b>
	+	On the other hand, the Department for Infrastructure’s revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. <b>In such a scenario the minor positive effect would be retained overall.</b>
	?	<b>Given that we do not yet know to what extent the Department’s plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.</b>
9. Promote an integrated transport system & encourage sustainable travel: Consolidated issues	+	<b>Consolidating the cumulative significant positive and unknown effects above, and taking consideration of the specific reasons affecting each, the overall cumulative effects for SA objective 9 are considered to remain as minor positive.</b>

SA Objectives	Potential Cumulative, Secondary & Synergistic Effects	
<b>ENVIRONMENTAL OBJECTIVES</b>		
Consolidated Environmental Objectives: 10. Biodiversity 11. Soil Quality 12. Historic Assets 13. Landscape 14. Open space 16. Water Resources 17. Air Quality 18. Low carbon 19. Climate Change	+	<p>The plan's growth strategy, which sees a significant rise in population over the plan period, will inevitably add pressure for additional housing land. Whilst much of this will be directed at inner city and brownfield sites, some sites may have an impact on undeveloped land and biodiversity; which has the potential to affect the green and active objectives generally. Nonetheless the draft policy approach seeks to ensure a sustainable approach and meet the environmental objectives. The plan's growth strategy is based on sustainable growth, maintaining a compact urban form, seeking to increase densities, reducing the need to travel and facilitating sustainable travel modes. These policy approaches, taken together, should ensure that the development strategy and future growth is sustainable and does not prejudice or undermine the environmental objectives, including the objectives around climate change, greenhouse gas emissions and resilience.</p> <p>Many of the green &amp; active policies are in accordance with national planning policy and other existing statutory requirements. These include meeting our obligations in terms of natural heritage, biodiversity, water quality and climate change. In this regard, the draft policies help to secure the statutory and agreed policy approach, insofar as the LDP, as a land use planning tool, can assist in meeting these overall aims and objectives. The plans and programmes of others, including government departments and state agencies, are also set within the same overall macro-policy and regulatory framework. <b>The overall cumulative effect of all relevant policies working together is therefore considered to be minor positive.</b></p>
15. Promote the sustainable management of waste	-/+	<p>Population growth will likely have an indirect effect leading to a direct increase in waste generation. Policies to move towards reduce, reuse and recycling and technological advances will aim to neutralise this over the plan period, however; there may still be a minor negative cumulative effect in the short term until such times as sufficient infrastructure and services are developed and implemented in the plan area.</p> <p>Synergistic effects are possible between HOU2, HOU4, RD1 and RD2, in that they can combine to work towards a compact, sustainable city with well integrated and designed developments that can make waste management easier and more efficient. <b>The overall cumulative effect therefore has the potential to increase to minor positive in the longer term.</b></p>

**Table 7: Cumulative, Secondary & Synergistic Effects Appraisal**



Draft Policy	Reasons for Selecting Preferred Options
<b>Where Reasonable Alternatives were Scoped Out</b>	
Various	Option required to uphold the aims of current legislation, regulations, or directives
	Option required to uphold the aims of RDS, SPPS, Council Strategy or Supplementary Guidance
	Option required to uphold the aims of existing regional policy approach of PPS
	POP identified inclusion of specific policy in LDP as the only realistic option
	DPS identified inclusion of specific policy in LDP as the only realistic option
	No reasonable alternatives were identified based on the scoping evidence
	Only one realistic option identified for high-level criteria based policy
<b>Selecting Reasonable Alternatives</b>	
SD2	Preferred option allows for a range of policies within the LDP to target new development to the most appropriate locations. It provides greater variation, which could have significant positive implications when combined with other plan policies.
SD3	In line with the RDS, the preferred option will make significant positive contribution to economic development and encourage a more managed approach to regeneration and re-use of the historic built environment.
HOU1	In line with the RDS, the preferred option will provide better certainty around development proposals and investment and encourage a more managed approach to regeneration and re-use of the historic built environment.
HOU2	The rejected option could negatively impact the growth strategy and sequential approach proposed for development. In line with the SPPS the preferred option seeks to provide clarity and ensure the plan's ability to deliver robust, sustainable communities.
HOU3	The preferred option would benefit fundamental sustainability objectives. Not having this option could negatively impact the ability to meet affordable housing need, and the achievement of a compact urban form and sustainable patterns of development.
HOU4	The preferred option will ensure the protection of established character and patterns of development, with flexibility for proposals to adapt to their context. The rejected option is less flexible and would not sufficiently account for growth aspirations, local character and environmental quality.
HOU5	The preferred options of the four components give a comprehensive and complete affordable housing policy for the plan

Draft Policy	Reasons for Selecting Preferred Options
HOU7	The preferred option takes account of the wider cost benefit analysis implications of Belfast's role as an age-friendly city, recognising the need to address current wheelchair accessible housing shortage and to proactively manage availability of homes to meet disabled persons' needs
HOU13	The preferred option will meet fundamental objectives relating to access to quality housing, economic development, and efficient use of water resources and air quality. The rejected option could negatively impact the ability to meet affordable housing need
DES2	The preferred option will manage major applications, enabling comprehensive and coordinated development and helping avoid piecemeal schemes
DES4	The preferred option aims to protect and enhance the character of the city and promote a high standard of quality design
RD1 & RD2	Consolidating the combined, preferred options of the two components gives a comprehensive residential development design policy for the plan
RD3	Combining the preferred options of the two components gives a comprehensive residential development design policy for the plan
EC2	The preferred option is the most realistic to achieve baseline economic growth over the plan period, whilst the rejected option could not
TLC1	The preferred option recognises Belfast as the regional focus of tourism, leisure and cultural amenities and seeks to improve facilities for tourists to build a strong city break destination. It provides better certainty for development and investment decisions, to deliver the council's Belfast Agenda and Integrated Tourism Strategy

**Table 8 – Summary of Reasons for Selecting Preferred Options**

## 7. Limitations and difficulties encountered

- 7.1 Within a process of this nature it is acknowledged that there a number of limitations. In particular, these can derive predominantly from the strategic, high nature of an assessment at plan level. In addition, whilst there are operational policies in the DPS, some of which relate to designated areas, they are in the main not site-specific and are intended to apply across the entire area.
- 7.2 The strategic policies in particular are effectively divorced from the locational aspect, which means that some social and economic effects cannot be fully assessed until such times when assessing and prioritising sites to be zoned at LPP stage.
- 7.3 Likewise, assessment of many of the environmental aspects is not fully possible at this stage, and will need to be considered in more detail where the specific zoning of sites will be progressed.
- 7.4 In addition to locational uncertainties, the absence of knowing what market conditions may be like in the future means it is not possible to fully determine likely effects for certain options. Furthermore, for many of the draft policies on environmental protection and heritage policies, there were no alternative options as the LDP requires to be consistent with extant national and regional planning and environmental policy.
- 7.5 The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.
- 7.6 As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report.

## 8. Recommendations

8.1 Whilst the appraisal of the Draft Plan Strategy predicts a range of generally positive sustainability effects, a number of recommendations have been proposed to help minimise negative impacts and maximise the sustainability performance of the plan. These are presented in **Section 5.8** of the **SA Report**, and include the following:

- ▶ Policies have been strengthened or introduced to ensure suitable measures are in place to appropriately manage the impact of development;
- ▶ Criteria based policies have been worded to directly mitigate impacts on social, economic and environmental factors, and to control or restrict specific development to exceptional, criteria based circumstances. This will be further emphasised through the Local Policies Plan;
- ▶ Flexibility has been introduced where required to ensure appropriate balance and avoid conflicting prejudice;
- ▶ Management plans, assessments and statements are a requirement of relevant policies to demonstrate suitable levels of protection, mitigation or enhancement for development proposals;
- ▶ Delivery of the Green & Blue infrastructure network is actively encouraged and promoted through the draft policies, and will continue through the Local Policies Plan;
- ▶ Conditions, agreements and enforcement measures will manage impact and aftercare of specific proposals.

## 9. Monitoring

- 9.1 The SA Report provides a proposed monitoring framework to measure the implementation of the LDP in relation to the social, economic and environmental baseline aspects which were assessed as likely to be significantly affected, or where opportunities for an improvement in sustainability performance may arise.
- 9.2 Monitoring for the SA will be aligned with that of the LDP itself and our Community Plan, The Belfast Agenda, both to avoid duplication and ensure that appropriate remedial action can be taken where required. The proposed monitoring measures are presented in **Section 6** of the SA Report.

## 10. Next Steps

- 10.1 Following publication of the Draft Plan Strategy, the SA Report and updated Scoping Report, representations are invited through the subsequent consultation process. Modifications to each may be

made in response to consultation, and any significant changes to the plan will be subject to additional appraisal.

- 10.2 SEA Regulations require the council to produce a formal, post-adoption SA Statement to accompany the Plan Strategy, as soon as reasonably possible after its adoption. This statement will outline how the SA process has informed and influenced the plan preparation and decision making process, and demonstrate how consultation on the SA was taken into account.

## 11. Consultation Arrangements

- 11.1 The SA Report and Scoping Report are available for consultation alongside the Draft Plan Strategy and supporting documents, including the HRA and EQIA, for a statutory consultation period of **eight weeks**, from **20 September** to **15 November 2018**. Prior to this it will also be available for review for a **four week** period; from **23 August** to **20 September 2018**. It can be viewed

online on our [Local Development Plan webpage](#). Hard copies can be viewed at the above address.

- 11.2 Responses to this consultation exercise should be sent to [localdevelopmentplan@belfastcity.gov.uk](mailto:localdevelopmentplan@belfastcity.gov.uk) and:

**Belfast Planning Service  
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