PLANNING APPEALS COMMISSION

The Planning (Northern Ireland) Order 1991

Article 7

PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE BELFAST METROPOLITAN AREA PLAN 2015

PART 2

REPORT ON BELFAST CITY COUNCIL AREA

by

Commissioners E Kinghan, A McCooey, A Speirs & M Jones

Date of Report: 8th July 2011
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APPROPRIATE TO KEY SITE REQUIREMENTS

The purpose of this section is to set out our general approach to the matter of key site requirements attached to zonings. We consider that many of the key site requirements specified in the plan are not in accordance with the guidance set out in paragraph 39 of PPS1. The guidance states that development plans should set out the main planning requirements. It is clear that this is intended to address such matters as constraints to be overcome and specific issues in relation to the site. They should not read like universal informatives or planning conditions to be attached to every site without any thought as to whether they are actually key to the development of the individual site or not. We shall also address the situation where the matters specified are addressed by regional policy and so the key site requirements are merely duplication.

Acceptable Uses

We consider that there may be cases where the range of acceptable uses should be specified in the form of key site requirements. This would normally relate to employment or mixed use sites. The list of acceptable uses on employment sites that do not have specified uses, however, should be set out in the strategic employment section of the Plan and cross-referenced in each District Volume.

Density

PPS 12 requires minimum density levels to be set for housing sites within urban footprints and other sites as deemed appropriate. Maximum densities may also be specified where required. For this reason we consider that density does not need to be specified in every case. Where density has not been proposed as a key site requirement, it will be for the Department to consider if it is appropriate to include it in the adopted Plan. For the purposes of calculating the estimated yield from objection sites we have worked on the basis of a density of 25dph unless otherwise specified. It will be for the Department to consider individual proposals in accordance with regional policy where no density is specified.

Transport Assessment

Transport Assessment is addressed by Policy AMP 6 of PPS3 and requires developers to submit a transport assessment, where appropriate. We therefore consider that there is no need to include this as a key site requirement. Furthermore, many key site requirements in the Plan specify the highway improvements considered necessary. We consider that this may pre-judge the outcome of the transport assessment process. We note that paragraph 4.7 of PPS3 allows for the possibility that necessary infrastructure improvements may not be identified until the planning application stage. The plan should only specify matters that are known to be a constraint to development i.e. the development could not proceed without certain highway works being undertaken or additional public transport being provided, etc.

We note that the plan’s key site requirements often indicate that the layout shall provide for cycle and pedestrian links. We consider that this is a requirement of regional policy and should be addressed in the concept plan for the site and the transport assessment.
Similarly the plan often specifies that an Article 40 agreement may or will be required to ensure that necessary highway improvements and local facilities are provided. There may be other means of achieving such provision. The issue is covered in general terms in GP 5 of PPS13, which states that developers should bear the costs of transport infrastructure necessitated by their development. An Article 40 agreement can be required at application stage should it prove necessary and we do not consider that specific reference to Article 40 agreements is necessary as a key site requirement.

**Landscaping**

Many of the landscaping requirements in the plan read as planning conditions. They are certainly not unique or key to the individual site. We consider that the retention of existing vegetation, buffer planting to the settlement limit and maintenance of open watercourses are covered by regional policy in PPS7 and are matters that can be addressed in the concept plan and at the detailed application stage. Guidance is also found in Creating Places and DCAN 8. Landscaping should only be included as a key site requirement in appropriate circumstances where there is a particular issue unique to the site in question.

**Flood Risk**

PPS15 states that development plans will not bring forward sites or zone land that may be susceptible to flooding unless in the most exceptional circumstances (paragraph 6.4). The plan attaches an almost standard requirement for a flood risk assessment for many zonings. We have several difficulties with this approach: most fundamentally that land at risk should not be zoned. In any case flood risk assessment is required by PPS15 where relevant. We consider that the Department should have assessed whether sites fall within a floodplain as part of the preparation of the plan. We do not endorse this type of key site requirement and consider that this is a matter addressed by regional policy and guidance in PPS15.

Notwithstanding the Department’s stated approach to objection sites where flooding is an issue, the correct approach is set out in regional policy. A site may be ruled out if it lies totally within the floodplain. If the extent of the floodplain is not known a flood risk assessment is a requirement of regional policy. Drainage assessment is a requirement of Policy FLD 3 in PPS 15 and key site requirements of this nature are a duplication of that policy and are unnecessary

**Concept Plans**

Planning Policy Statement 7 requires the submission of Design Concept Statements so we shall not impose this key site requirement. We may specify matters to be included in the Concept Statement. There may be instances where we consider that in line with Planning Policy Statement 7 a Concept Master Plan should be required to guide development of the site. We will indicate what matters need to be included in the Master Plans in order to address the complex issues involved given the scale of the site.
Housing

Housing recommendations will identify those sites to be held in the Short Term Land Reserve. Other sites recommended for inclusion in the Plan, including those within development limits, will be required to meet the Housing Growth Indicator and should be incorporated into the adopted Plan to meet needs to 2015.

Social Housing

We have recommended that the Department reviews housing zonings and objection sites recommended for inclusion in order to assess their suitability for social housing. It will be for the Department to impose key site requirements related to social housing on appropriate sites in the adopted Plan.

NOTES

i. Each volume follows the sequence of the relevant volume of the Plan i.e. objections to the settlement limits, then housing zonings, employment, etc.

ii. In view of our conclusions in Part 1 of the Report, objections to sites within Lagan Valley Regional Park will be addressed in a separate volume.
### List of Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tr>
<td>AOCMD</td>
<td>Area of Constraint on Minerals Development</td>
</tr>
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<td>AONB</td>
<td>Area of Outstanding Natural Beauty</td>
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<td>AOHSV</td>
<td>Area of High Scenic Value</td>
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<td>AR</td>
<td>Arterial Route</td>
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<td>ATC</td>
<td>Area of Townscape Character</td>
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<td>BCC</td>
<td>Belfast City Council</td>
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<tr>
<td>BHA</td>
<td>Belfast Harbour Area</td>
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<td>BUAP</td>
<td>Belfast Urban Area Plan</td>
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<td>DOS</td>
<td>Development Opportunity Site</td>
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<tr>
<td>EHSSB</td>
<td>Eastern Health and Social Services Board</td>
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<td>HGI</td>
<td>Housing Growth Indicator</td>
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<tr>
<td>HPGD</td>
<td>Historic Park, Garden and Demesne</td>
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<td>LLPA</td>
<td>Local Landscape Policy Area</td>
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<td>LVRP</td>
<td>Lagan Valley Regional Park</td>
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<td>LOTS</td>
<td>Living Over the Shop</td>
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<td>MEL</td>
<td>Major Employment Location</td>
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<td>NIHE</td>
<td>Northern Ireland Housing Executive</td>
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<td>NITHC</td>
<td>Northern Ireland Transport Holding Company</td>
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<td>PPS</td>
<td>Planning Policy Statement</td>
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<td>PSRNI</td>
<td>A Planning Strategy for Rural Northern Ireland</td>
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<tr>
<td>QUB</td>
<td>Queen’s University of Belfast</td>
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<tr>
<td>RDS</td>
<td>Regional Development Strategy</td>
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<td>RLW</td>
<td>Rural Landscape Wedge</td>
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<tr>
<td>RSPB</td>
<td>Royal Society for the Protection of Birds</td>
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<tr>
<td>SLNCI</td>
<td>Site of Local Nature Conservation Importance</td>
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<td>STLR</td>
<td>Short Term Land Reserve</td>
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<tr>
<td>TA</td>
<td>Transport Assessment</td>
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<tr>
<td>TPO</td>
<td>Tree Preservation Order</td>
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<tr>
<td>ULW</td>
<td>Urban Landscape Wedge</td>
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BELFAST CITY CENTRE

Objections to the Belfast City Centre Strategy
(Objections 1221/7, 1294/2, 1398/5, 2809/3, 2810, 2965/82, 3219/2 & 3568/13)

Objections to the City Centre strategy that are focussed on the inclusion of Titanic Quarter are addressed below. Those objections related to the failure to promote city centre living referred to City Centre sites with development potential. We take it that this means Development Opportunity Sites. We have set out our comments on the general approach to DOS under Policy SETT 5 in Part 1 of our report. We will also address individual objections below. In general we would endorse the Department’s comments that mixed uses are not precluded on City Centre sites. We would also refer to the considerable level of residential development in the City Centre in recent years, which was drawn to our attention by other objectors. The Department also referred to the provisions of Plan Policies SETT 3 and HOU 4, which encourage residential uses in the City Centre. In addition, the Plan protects existing areas of City Centre housing and provides for new housing zonings. Objections to City Centre Character Areas are considered below. Regional policy sets out the range of land uses that are acceptable in city and town centres and we see no need for the Plan to replicate or duplicate this guidance. Titanic Quarter is not part of the City Centre and is a different type of development than the re-development of vacant sites in the City Centre referred to by the objector.

We consider that the City Centre Strategy does refer to key linkages with other parts of the city. We would generally endorse the objection seeking the extension of the Belfast Cross eastwards through Queen’s Square to Queen’s Quay as a major linkage from the City Centre to the river and the Odyssey. This would assist with integrating the river and the City Centre. However, we consider that it should only extend to Donegall Quay so that it will be contained on the western side of the river. Gateways to the City Centre are defined. Building heights are considered below in relation to City Centre Character Areas. However, we note that several tall waterfront buildings have been recently completed in the City Centre. Objectors who consider that the Plan has not achieved a vision for the City Centre have failed to specify their concern. We disagree with that assertion and consider that the range of measures proposed demonstrates a clear vision for the City Centre. Belfast City Airport and the adjacent A2 are outside the City Centre and there was no suggestion that they should be included. Objections to the Airport surplus lands are considered in the Belfast Harbour Area section of this report.

Recommendation

We recommend that the Belfast Cross (as shown on page 19 of the Belfast Volume of the Plan) is extended eastwards through Queen’s Square to Donegall Quay as a major linkage from the City Centre to the river. We recommend no other changes to the Plan as a result of these objections.
OBJECTIONS TO DESIGNATION CC 001 - BELFAST CITY CENTRE BOUNDARY

General comments

The Plan states that the City Centre boundary has been drawn to balance the need for growth appropriate to a regional centre with some level of containment. The boundary is also stated to encompass the traditional concentration of retailing and other city centre functions. The reason for the inclusion of lands on the eastern side of the river Lagan is also explained. The Retail Study technical supplement sets out the rationale for city/town centre boundaries at paragraph 7.65, some of which is repeated in the Plan. It also states that the quantitative need for additional retail floorspace has been taken into account in defining the boundaries.

In considering these objections we have had regard to the regional planning policy background for Belfast City Centre as provided by the RDS and PPS5. Some objectors referred to the criteria or factors used by the Department, Colliers and the Commission in order to define the town centre boundary for Craigavon. We note their assessment of the identified factors. The Commissioners in the Craigavon retail report made it clear that the most important factors were to generally focus all existing and planned commercial and civic investment within a relatively tightly drawn area and to reflect any existing natural or physical barriers where possible. We agree that defensible boundaries, the mix of uses, opportunities for investment, etc. are also important considerations. However, we feel that the starting point must be drawing a city centre boundary that is tight enough to focus investment and ensure that the City Centre is sufficiently compact to encourage sustainable transport and provide convenience for shoppers. Obviously, in view of the difference in scale between Craigavon and Belfast, the extent of the latter’s City Centre must be more widely drawn; notwithstanding this, the general principles will still apply. There is a balance between ensuring that the City Centre is large enough to provide sufficient land to meet retail and other needs of the regional shopping centre and ensuring a compact, vital and vibrant city centre. We consider that the City Centre boundary must be drawn to achieve this balance and should not be so extensive as to dilute the notion of a traditional city centre and policies aimed at focussing development on the City Centre in order to protect its vitality and viability.

Objections seeking the inclusion of Titanic Quarter
(Objections 831/22, 831/24, 864/7 & 1477)

Those objections focussed primarily on Titanic Quarter argued that it should be included within the City Centre and the Main Office Area. We shall address this general issue here. The objections claim that inclusion of Titanic Quarter in the City Centre would be consistent with Belfast City Council’s vision for the City Centre. However, Belfast City Council lodged a counter-objection to the inclusion of Titanic Quarter in the City Centre. The Council also resisted any attempts to increase office and retail uses in Titanic Quarter. The objection explains what uses are planned for Titanic Quarter but does not explain why these uses are appropriate to a city centre. For example, knowledge-based and creative industrial uses are not necessarily city centre uses. The
objection makes no case on the grounds of retail need because it argues that the nature of retail uses within Titanic Quarter can and should be controlled in the Plan so that comparison shopping remains in the traditional City Centre in order that its vitality and viability is not threatened. Such an approach is inconsistent with PPS5, which states that shopping largely underpins the use and value of town centres and makes a major contribution to their vitality and viability. We have already concluded in Part 1 of our report that Titanic Quarter does not function, and was not intended to function, as part of the City Centre in land use terms. The other uses referred to in the objection can be accommodated whether or not Titanic Quarter is in the City Centre, with the possible exception of office uses. This is where we arrive at the nub of the objection in our opinion. The objection argues for offices to be allowed in a city centre Titanic Quarter but not as part of the Main Office Area. It is argued that a separate Office Node should be designated. We have addressed the Main Office Area in Part 1 of our report and concluded that it should be deleted and therefore that offices should be allowed throughout the City Centre. The inclusion of Titanic Quarter in the City Centre would allow unfettered office development, which could undermine the role of the City Centre. We shall further address the issue of office development more specifically in Titanic Quarter in the Belfast Harbour Area section of this report.

A great deal was made of linkages to the City Centre as a reason to include Titanic Quarter within it. Many City Centre fringe areas are well linked to the City Centre but it does not mean that they are, or should be, part of the City Centre. We consider that the City Centre boundary must be drawn to achieve the objectives that we have outlined above. In terms of accessibility, we consider that this must relate to accessibility on foot from the centre and not from outlying parts of the City Centre i.e. to use the example provided it should be proximity to City Hall and not proximity to the Odyssey that is the benchmark.

There is clearly a need to define a City Centre boundary somewhere. The Department has set out the rationale for the boundary as described above. The objectors have not explained adequately the reasons why the Plan is flawed in this definition. We consider that the inclusion of Titanic Quarter would spread the City Centre too far, contrary to the aims identified above. We do not see the relevance of the argument that the City Centre should be expanded further because the BUAP City Centre boundary was defined in the context of the Troubles. The City Centre has been extended in the Plan to include the river and lands on the eastern bank. We are at a loss to understand the inclusion of lands on the eastern side of the river, as the Lagan would have provided a logical and defensible boundary for the City Centre. There is no imperative to bring every city centre-type use, such as the Odyssey complex, within the City Centre. Nonetheless, in the absence of any objections to that effect, we cannot recommend any changes to the boundary.

We consider that Laganside can readily be distinguished from Titanic Quarter in locational terms and does not set a precedent for Titanic Quarter to be included in the City Centre boundary. Laganside is located next to the City Centre along the banks of the Lagan as it flows through the City Centre. Indeed the commercial and public buildings were inside the City Centre as defined in BUAP. Titanic Quarter is more remote as discussed above.
Objection seeking the inclusion of lands at Clarendon Dock
(Objection 2015/5)

The City Centre boundary in the Plan extends to Clarendon Dock, as it did in BUAP. The defined City Centre includes office buildings in this area. The objection site was divided into 3 areas by the Department (A-C). Area A between Clarendon Road and Corporation Street contains two new office/apartment blocks and the main car park for the Clarendon Dock area. We have no difficulty with the Department’s concession that this site should be included in the City Centre. Area B is a small square and obviously part of the public realm associated with Clarendon Dock. Again we have no difficulty with the Department’s concession of this area. Area C contains informal car parking and the Hamilton Shipping office building, both accessed from within the gated docks entrance at Corry Road. We do not consider that this area relates to Clarendon Dock. It does not contain city centre uses either. The Department appears to have conceded it because it was included within the site of a planning permission in 1992. This alone does not justify the inclusion of the land. No development has taken place on the land in the intervening 20 years and there is no other justification for its inclusion. We do not agree with the Department’s assessment and consider that Area C should remain outside the City Centre in the Plan.

The objectors argued for the inclusion of the remainder of the land up to Dock Street i.e. land around Pilot Street. This land is outside the site identified on the plan accompanying the original objection. This land is therefore outside the scope of the original objection and cannot be considered.

Recommendation

We recommend that parts A and B of the objection site be included within Designation CC 001 - Belfast City Centre boundary.

Objections seeking the inclusion of Yorkgate
(Objections 2707/1 & 2760/20)

We would refer to our general comments above. The objector appears to have misunderstood the concept of accessibility. In the context of defining town or city centres, accessibility means easy access to other parts of the City Centre. It is implicit that central locations will be accessible by car, train, bus etc. The Commissioners in the Craigavon retail report made it clear that the crucial factor was ease of access on foot to and from other parts of the town centre and not access into central locations in general. We note that Yorkgate comprises retail and other uses that would be acceptable city centre uses in principle.

The factors that we consider to be critical in the consideration of this objection are the physical barrier of the Westlink, which is a 5 or 6 lane road separating Yorkgate from the City Centre. We consider that this is also a major obstacle to accessibility from the City Centre for shoppers. There is also a residential area between Yorkgate and the Westlink (to which there is no objection), which represents an intervening land use. The boundary between this residential area and the Yorkgate District Centre is a formidable wall, which represents another physical barrier. The inclusion of Yorkgate
would not contribute to a compact city centre form. There are ample areas of land and opportunities for investment within the defined City Centre to ensure that its regional role and vitality/viability are maintained and strengthened. There were specific reasons for including parts of Laganside within the City Centre, which are set out in the draft Plan and are not the subject of any objections. The objection related to the Clarendon Dock area is considered above. We see no similar justification for the inclusion of Yorkgate. We have not considered the absence of a major food superstore in the City Centre to be of any consequence, as discussed in the strategic retail chapter of our report. The fact that Yorkgate has a food superstore would certainly not be enough to justify its inclusion in the City Centre. The objection must fail because of the site’s remote location, physically separated from the City Centre. We therefore recommend no change to the Plan as a result of this part of the objections.

Lands within the NW of the City Centre
(Objection 3344)

The original objection referred to Designation CC 001. However, the lands described in the statement of case are actually within the defined City Centre and appear to be within the Scotch and Cathedral Quarters. Notwithstanding this the submission refers to the description of the Western City Fringe Character Area (CC 014) as evidence for the need for a strong masterplan for this area because it has been ignored and neglected. The area between Peter’s Hill and North Queen Street is mostly protected City Centre housing. We found this submission confusing in its aspirations and remedies sought. We would merely comment that the development plan cannot specify the strategies and priorities of other Government Departments. All locations within the City Centre benefit from the planning policies favouring retail, leisure, civic, etc. developments as set out in regional policy. There should be no amendment to the Plan as a result of this objection.

Lands at Ravenhill Road
(Objections 2266 & 2313)

These objections sought the inclusion of a small site within the City Centre Gateway at Albert Bridge. The site is to the south of the defined gateway in the Plan and is occupied by Lagan Water Sports and another warehouse type building. We do not see the need to include the site because it is used by this charity or to balance out the gateway site north and south of the bridge. The charity continues to operate and as the site is developed and well-used, we fail to see what need or benefit there is in inclusion within the City Centre. We therefore recommend no change to the Plan as a result of this objection.

BELFAST CITY CENTRE RETAILING

Objections to Designation CC 007 - Primary Retail Core, Belfast
(Objections 846, 2760/21, & 3800)

Planning Policy Statement 5 at paragraph 11 states that development plans will identify policies for retailing in a specific area and may indicate where new retail development is
to be focussed and existing provision is to be enhanced. Development plans may, where appropriate, identify a Primary Retail Core within town centres. It does not define Primary Retail Cores but does refer to controlling non-retail uses within Primary Retail Cores (paragraph 23). It is clear that, where defined, the Primary Retail Core is the favoured location for major retail developments, especially for major proposals for comparison and mixed retailing (paragraph 40). We note that Draft Planning Policy Statement 5 provides a definition of Primary Retail Core - this designation will indicate where new retail development is to be focussed and existing provision is to be enhanced.

Objection 846 related to the extension of the Primary Retail Core in the Plan beyond the Main Shopping Area indicated in BUAP (with the exception of Victoria Square). This basically relates to the blocks east and west of Donegall Square and the area south of Castle Street between College Avenue and Queen Street/Fountain Street. These blocks contain a range of uses, but little in the way of major retail units. The block on Donegall Square West contains mostly financial institutions. The objection is concerned about this dispersion of the retail development, which runs counter to Belfast City Centre’s main strength of a compact retail core. It states that there is little justification for these new areas to be added to the Primary Retail Core. It is not correct to say that there is no support for this in the Retail Study. The study recommends that these areas be added because of the retail activity prevalent in them. We do not agree with the Department that this extension to the Primary Retail Core would ensure the continuation of a compact and convenient shopping environment. It will offer more choice of sites. The Department’s remaining justification for the expanded area refers to new retail uses developing in these locations and BMTP proposals for a civic precinct and civic axis in the City Hall area. New retail uses can continue to develop in the City Centre without being in the Primary Retail Core, but we are concerned that too extensive a Core can lead to vacancy and undermine the objective of strengthening its retail focus. We consider that the Primary Retail Core should be compact in order to focus major retail development as envisaged in Planning Policy Statement 5. The proposals of BMTP have little or nothing to do with retailing and we see no basis in these arguments for the extension of the Primary Retail Core. We therefore uphold the objection and recommend that the Primary Retail Core is amended to exclude the areas identified on the plan accompanying the objection.

Objection 2760/21 related principally to convenience retailing being required to locate in the Primary Retail Core. We have recommended in our strategic retail section in Part 1 of our report that the new policy to replace Policies R1 and R2 should not refer to convenience retailing locating in the Primary Retail Core at all. The new Policy will only refer to comparison or mixed retailing (as Planning Policy Statement 5 does also). This addresses the objection, as acknowledged within the objectors’ statement of case.

Objection 3800 relates to DOS CC 067 at the junction of Donegall Pass and the Ormeau Road. This site is over 600m from the Primary Retail Core and separated from it by many non-retail uses. It is patently ridiculous to suggest the Primary Retail Core (or Main Shopping Area) be extended this far. We note that the statement of case does not refer to the Primary Retail Core objection but deals with the objection to the DOS. We recommend no change to the Plan as a result of this objection.
**Recommendation**

We recommend that Designation CC 007 – Primary Retail Core, Belfast is amended to exclude the areas identified on the plan accompanying objection 846.

**BELFAST CITY CENTRE OFFICES**

**Objections to Designation CC 009 - Main Office Area, Belfast City Centre**  
(Objections 831/18, 864/5, 1477, 1589, 2015/30, 2158, 3177, 3219/3 and 3641/9)

We have concluded in the strategic Offices Section in Part 1 of our report that there is no need for a Main Office Area in Belfast and that offices should be allowed throughout the defined City Centre in the Plan. We therefore have no further comment to make on objection that sought either extensions or reductions of the Main Office Area within the defined City Centre. These objections have been addressed by our strategic conclusions. We have considered the arguments for reducing the Main Office Area and rejected them.

In terms of other issues we have concluded that Titanic Quarter should remain outside the City Centre and therefore it obviously remains outside the Main Office Area also, as discussed in the preceding section on Designation CC 001. We have recommended that parts of the Clarendon Dock objection site be included within the City Centre and so they along with the remainder of the Dock will be considered suitable for office development. There is no change required to the Plan as a result of these objections.

**BELFAST CITY CENTRE CHARACTER AREAS**

**Background**

The Plan designates 9 City Centre Character Areas. Within each Character Area is a set of Urban Design Criteria under 4 headings: General, Street Frontages, Intersections and Elsewhere. This section considers objections to these urban design criteria which generally fall into 2 categories:

1. General objections - issues raised in respect of all areas and
2. Objections to the criteria within a specific Character Area.

The City Centre Character Area policies in the draft plan are accompanied by Technical Supplement 6, Volume 1, to which there were some objections. We cannot deal with freestanding objections to the Technical Supplement as it does not form part of the Plan.
General objections to all Character Areas CC 010 - CC 018
(Objections 921/11, 3641, 1589, 2760/22, 3142, 3141, 862/1, 3236/2, 3515, 3219/5, & 3052/1)

There were a number of general objections to all Character Areas and to particular specified Character Areas where it was stated that the design criteria were ill conceived, too general and over prescriptive. These objections lacked clarity or explanation. We have considered the information provided by the Department including their consultants’ reports and analysis of each Character Area and conclude that in general the design criteria are merited. We consider such design parameters to be basic expectations of responsive urban design within a City Centre context and we consider the Department’s criteria based approach to be valid. We recommend no change to the Plan as a result of these general objections.

Objections 271/1 & 3219/4
There were general objections made to the urban design criteria but with reference to particular specified criteria and in particular to restrictions on heights. Again, these general objections did not explain why the urban design criteria are of concern. We are therefore unable to make any recommendations based on these objections. Accordingly, we recommend no change to the Plan.

Objection 2965/104
It would not be appropriate to include land uses within Character Areas as they are designated for the reasons set out on page 28 of the Plan. Proposals can come forward to be assessed on a case by case basis through the development management process in accordance with the Plan proposals and relevant policy. We recommend no change to the Plan.

Objection 1469
This objection sought the renaming of the term ‘Character Area’ with the heading ‘Design Strategy /Framework’ as there may be confusion with Conservation Areas. We consider there to be a clear distinction and renaming is unnecessary. We also consider that the inclusion of inspirational sketches for developers is unnecessary as this could predetermine design proposals and could be overly restrictive. This objection raised the issue of promotion of residential use within the city centre with reference to LOTS. This is addressed in Part 1 of the Plan.

As there is a statutory duty in Conservation Areas, PPS 6 must take precedence. The Plan should, however, clarify how the urban design criteria will be applied within Conservation Areas and the relationship between the 2 designations.

Recommendation

We recommend that the Plan should clarify how the urban design criteria will be applied in Character Areas which include a Conservation Area.
Designation CC 010 - Commercial District Character Area  
(Objection 130/4)

This objection stated that the street frontages at Glengall Street with the stated maximum height restriction of 11 storeys seemed high in the proximity of the Opera House. We agree that this is too high in this context immediately to the rear of a Listed Building. In any case we see no need to specify heights on this part of Glengall Street as any proposal that comes forward would have to be judged on its impact on the Listed Building.

This objection also referred to the corner site adjacent to the Holiday Inn on Ormeau Avenue/Dublin Road. However, this site has been developed.

Recommendation

We recommend that the 6th bullet point is deleted.

Objection 897/1

This objection referred to the height restrictions, which impacted on the Superbowl site in Clarence Street West. However, this site has subsequently received planning permission and has been developed. We recommend no change to the Plan as a result of this objection.

Objection 2014/1

This objection sought the removal of height restrictions to 9 storeys, under the ‘Elsewhere’ section, which impact on the BIFHE site on Brunswick Street. We note that this site has received planning approval with a maximum height condition of 70m – 17 storeys, which is 8 storeys in excess of the design criterion. The developer is therefore not restricted to the design criteria height requirements. The height restrictions cover a wider area within the Character Area and we do not consider that these should be removed in their entirety due to one individual planning approval. We recommend no change to the Plan as result of this objection.

Designation CC 012 - Old City Character Area  
(Objections 846 and 799)

The objector’s main concern was the building heights criteria and the failure to establish principles for the development of Castlecourt. In terms of the former issue, the Department was willing to amend the second bullet point to allow for departure from the specified heights in exceptional circumstances. Such exceptions would require a comprehensive design statement and visual impact assessment in order to demonstrate that the proposal complied with the principles of good urban design.

The Urban Design Criteria have developed from detailed analysis of the Character Areas and aim to ensure that new development responds to and ‘fits’ within its context. In part 1 of the Plan, within Policy UE1, we have agreed with an amendment that requires proposals to be in general accordance with urban design criteria; this
amendment allows the Department to consider proposals in the round. In circumstances where all parameters are not met, they need to consider the extent to which the departures undermine the Character Area. Buildings heights are an important contextual element in terms of accommodating new buildings into the existing urban fabric.

This wording suggested by the objector would amend design criteria to ‘guidance’ which would be inconsistent with our recommendations for Policy UE1 which refers to ‘criteria’. There is a significant difference between the term ‘criteria’ and ‘guidance’ and we consider the specific criteria to be necessary to achieve a quality design led solution which responds to and respects its Character Area context. Irrespective of the Department’s broad agreement with the objectors suggested amendments, CC 012 must be consistent with Policy UE1.

The objector for Castlecourt is not seeking the removal of the height restrictions, but seeks to expand bullet 2 as quoted and amend the height criteria to remove references to minimum/maximum and refer instead to ‘normally fall within the guideline range of 4/6 storeys’. The objectors state that in the main the proposals for Castlecourt broadly comply with the heights in the Policy, however there are some departures given the scale and complexity of the scheme. We consider that our recommendations for UE1 would address these departures. It is for the applicant to demonstrate exceptions in individual circumstances. We do not agree with the suggested amendments.

We cannot endorse the Department’s suggested additions for insertion into the amplification text following Designation CC 012. We see no need for yet more criteria to deal with the considerations of exceptions to policy. The matters raised are either statutory duties or normal considerations as part of the development management process.

We endorse the view that there is a problem with the street pattern linkages and permeability through the area around Castlecourt as a result of the shopping centre. An additional criterion was suggested for the ‘Elsewhere’ section by the objector. We consider that the Department’s suggested wording broadly meets the objection and recommend that it is included.

Objection 799 refers to the fact that proposals for Castlecourt will have a blighting effect on interests of acknowledged importance. This objection lacks clarity and there is no remedy sought. It is a requirement of the development management process that it consider any interests of acknowledged importance. We recommend no change to the Plan as result of this objection.

**Recommendation**

We recommend that the following criterion be added to the ‘Elsewhere’ section:

*Within the area bounded by North Street, Millfield, Berry Street and Royal Avenue, comprehensive development proposals will be acceptable subject to an enhanced public realm and the creation of streets which reinstate the historic urban grain and secure east/west and north/south linkages, including links through CastleCourt.*
**Designation CC 013 - Scotch and Cathedral Quarters Character Area**  
(Objections 1151/1, 2819/1 & 3219/5, 1586/5 and 2965/105)

Bullet point 3: This objection was to the height restriction to development fronting onto Dunbar Link as given its width of 30m and a ratio of 1:1 a building height of 30m should be acceptable. It was not specified how many storeys a building height of 30m could accommodate. This bullet point refers to the outer fringes of the Character Area addressing the inner ring road including Carrick Hill, Frederick Street, Great Patrick Street and Dunbar Link. The Plan goes on to say that the area is particularly weak along these fringes with many vacant sites and a lack of building frontage and loss of historic grain. Notwithstanding the widths of perimeter roads, the building heights specified along the outer fringes provide containment and consistency to the whole Character Area edge of which the objection site is only a part. The fact that a 1:1 ratio was permitted elsewhere should not set a benchmark for the extensive fringe areas of this Character Area.

Bullet point 4: We agree with the Department that a 1.5 m set back is necessary for the definition of the public/private realm for residential development where a privacy zone is essential. Upper floors may cantilever out. We do not consider this set back to be required for other uses given the widths of the streets and footpaths concerned. References to the set back required for other activities can be omitted.

Bullet point 11: This objection relates to a part of Talbot Street leading up to Dunbar Link in which it was argued the height restrictions applicable of 3-5 storeys are too restrictive. The objection does not explain why this restriction should be changed within this small part of the area and accepts that the restriction is generally acceptable within the rest of the Character Area. We consider, for consistency within the urban grain, that the height restriction should apply to the entirety of the area specified. The urban design criteria do not preclude new and innovative design.

Objection 1586/5 objected that the area behind Central Library is not designated as an ATC or Conservation Area. No specific area was identified for us to consider an ATC designation and we are thus unable to make a recommendation on the issue. The designation of Conservation Areas is outside the scope of this Plan.

Objection 2965/105 stated that there is no guidance for the promotion of cultural uses and creative industries or heritage uses in contrast with detailed guidance for the Titanic Quarter. This designation does not preclude these uses. Development proposals are considered by the Department on a case by case basis. The objector did not specify what guidance should be included. We recommend no change to the Plan as a result of this objection.

**Recommendation**

We recommend that bullet point 4 is reworded to omit the latter part of the sentence after ‘residential development’.
CC 014 - West City Fringe Character Area
(Objection 3825/86)

The ‘Elsewhere’ section refers to building heights to be a minimum of 3 storeys and a maximum of 4. This Character Area includes a number of zoned housing sites which the objector has stated are proposed for family social housing. We agree with the objector that the minimum height would prejudice development of these housing sites for low rise family social housing within a predominantly 2 storey residential context. We therefore agree that the minimum building height should not apply to housing zonings.

Recommendation

We recommend that the 1st bullet point in the ‘Elsewhere’ section should read, ‘Building heights shall be a minimum of 3 storeys (with the exception of lands zoned for housing) and a maximum of 4 storeys’.

CC 015 - Great Victoria Street Character Area
(Objection 3537/1)

This objection related to the urban design criteria being unduly prescriptive and inconsistent with zoning CC 055 Key Site requirements which require the preparation of a Masterplan. We disagree that there is inconsistency between CC 015 and CC 055 in that the latter zoning requires proposals to meet the urban design criteria set out in CC 015. NITHC sought the development potential of lands at Grosvenor Road, particularly in terms of building heights, to be informed by the Masterplan. We refer to our consideration of this general issue in respect of CC 012 and endorse the building heights criteria.

Intersections: We note that within this Character Area there is opportunity for a landmark building and its location is specified in bullet point 5 (on the site of the BT Telephone Exchange at the Grosvenor Road junction). It was conceded by the Department that the location of the landmark building could be elsewhere within the site as sought by the objector. We do not agree. This would not fulfil the objectives of providing a landmark building on a major intersection. We recommend no change to the Plan.

Elsewhere: The objector sought the deletion of the second bullet point in this section. We disagree for the reasons set out under CC 012. Accordingly, we recommend no change to the Plan as a result of this objection.

CC 016 - Shaftesbury Square Character Area
(Objection 1469/36)

We consider that the inclusion of inspirational sketches and photos for developers is unnecessary as this could predetermine design proposals and could be overly restrictive. We recommend no change to the Plan.
CC 017 - Laganside South and Markets Character Area and CC 018: Laganside North and the Docks

CC 017 and CC 018 - Objections 2242/2 and 3
‘Intersections’: The height criteria relating to both Character Areas restrict building heights to a maximum of 5 storeys. We note that the site on the northern side of the Albert Bridge is now occupied by an apartment block, which is partly 8-9 storeys in height. The height criterion for that ‘Intersection’ site is therefore redundant. We are unsure if planning approval exists for a building of similar height on the southern portion of land, within designation CC 017; if it does, then the height restriction for that site should either be amended or deleted.

We do not see any indication in the Plan that gateway sites should be occupied by ‘gatepost’ or landmark buildings. We have also stated our view that City Centre land on the eastern side of the Lagan is not an appropriate location for landmark buildings. We do not discern any particular similarity between the areas on the northern and southern sides of Albertbridge Road, which would dictate that they should be developed in the same way or with buildings of matching height. It is our view that, unless planning consent has been granted for a building in excess of 5 storeys on that part of the site within CC 017, the height criterion in the draft Plan relating to that land should be confirmed.

CC 017 - Objection 3219/4
The objector disagreed with the last paragraph of text in CC 017. We doubt the necessity for this narrative in the Plan. We note that it does not add anything to the Plan and recommend that it is deleted.

CC 018 - Objection 2666/10
‘Street Frontages’, 4th bullet point: This objection related to the building heights of development fronting onto Victoria Street and its set back. However no explanation was provided as to the amendments that should be incorporated. We have considered the information provided by the Department including their consultants' reports and conclude that the height restrictions are merited. Accordingly, we recommend no change to the Plan.

CC 018 - Objection 130/3
‘Elsewhere’, 2nd bullet point: The objector stated that the landmark building north of Great Patrick Street and east of Nelson Street should not be adjacent to the Cathedral Quarter. Such issues as the landmark building’s effect on views from Cathedral Quarter, or to Cavehill, can only be assessed at development management stage when a design proposal comes forward. Accordingly, we recommend no change to the Plan.

‘Elsewhere’, 3rd bullet point: This objection related to the landmark building between Queen Elizabeth Bridge and Queen’s Bridges and sought a restriction to 10 storeys (rather than 12 storeys) as there should be a more horizontal emphasis facing the river than a vertical one. We are surprised that the Department considered a landmark building to be necessary or appropriate to the east of the river and consider that any
reduction in height is welcome. We agree that a building with a horizontal emphasis is more appropriate at this location, however, we do not consider that a 10 storey building would achieve the horizontal emphasis sought. We see no reason for a landmark building in this location and recommend that all building heights to the east of the river should be as specified in the first sentence of the bullet point.

CC 018 - Objection 1469/33

‘Informatives’: The objector disagreed with the 6th paragraph of text. We consider that this does not add anything to the Plan and should be deleted.

Recommendations

We recommend that:

- The 2nd bullet point of designation CC 018, under ‘Intersections’, should be deleted.
- In the event that planning consent has been granted for a building in excess of 5 storeys, the 2nd bullet point of designation CC 017, under ‘Intersections’, should be amended to reflect the height of the approved building. Should no such approval exist, the bullet point should be retained, unchanged.
- The last paragraph of the amplification text of CC 017 should be deleted.
- The reference to a landmark building in the 3rd bullet point of the ‘Elsewhere’ section of CC 018 should be deleted.
- The 6th paragraph of the amplification text of CC 018 should be deleted.

DEVELOPMENT OPPORTUNITY SITES

In Part 1 of our report we have concluded that the Department should give further consideration to the concept of Development Opportunity Sites and the scope for strategic and locational policy required to ensure that their designation will meet the objectives of the Settlement Strategy. In view of these conclusions it will be necessary for the Department to reconsider the designation of all proposed DOSs. We address objections made to individual DOSs below in relation to specific issues raised but the relevance of our recommendations will be dependent on the outcome of the Department’s further deliberations on this issue. We have also indicated that Key Site Requirements often repeat regional policy requirements and that they should only include the range of land uses that are to be promoted within them and the specific constraints that need to be addressed. In view of these conclusions we do not propose to deal with individual objections to KSRs unless they raise specific issues.
OBJECTION TO DOS ZONINGS

CC 022: Hamilton Street/Catherine Street North  
CC 023: Catherine Street/Joy Street  
CC 071: Cromac Street/Eliza Street  
(Objection 427/6)

The objections from the Markets Development Association generally sought the re-designation of these DOSs to include a suitable mix of housing types including a social element to fulfil a local need (CC 022,023) and social housing/community uses (CC 071).

Given the sustainable location of these sites and our conclusions regarding the significant shortfall in housing provision in the Belfast area we see merit in the housing element of the objection and consider that the sites should be zoned for housing rather than as a DOS. In the absence of further information about the proposed community uses, or the Department’s conclusions on the need for a DOS at this location, we are unable to give further consideration to a mixed use.

Recommendation

We recommend that:

- DOS Zonings CC 022 and CC 023 are deleted and the sites zoned for housing; the level of social housing to be determined by the Department.
- If the DOS zoning CC 071 is confirmed, consideration should be given to the appropriate land uses within it, in the context of the objection submitted.

CC 035 - Castlecourt and lands to the North  
Objection 3804/1

This objection sought the removal of Castlecourt from the DOS. In view of our recommendation in Part 1 of our report that areas in beneficial use should not be identified as DOSs, we conclude that Castlecourt should not form part of this DOS. In light of this, the Department may wish to reconsider the principle and extent of the DOS.

Objection 846/2

This objection sought the inclusion of frontage buildings along North Street and Royal Avenue in the DOS. If the DOS is confirmed we consider that these properties should be included in order to provide a logical boundary for the zoning.

The objectors also sought the rewording of bullet point 1. The site lies within the Primary Retail Core and will be subject to the new policy recommended in Part 1 of our report to replace R1 and R2; the KSR is therefore unnecessary and should be deleted.

The objector sought a reference to DSD’s North West Quarter Masterplan which includes CC 035. The Department agreed to this. We endorse the Departments
position. The reference to the North West Quarter Masterplan will be dependant on whether or not the DOS is confirmed.

**Recommendation**

If the DOS is confirmed, we recommend that;

- Castlecourt is removed from the DOS and consideration given to retention of the remainder of the zoning.
- The boundary of the DOS is amended to include the frontage buildings along Royal Avenue and North Street.
- Bullet point 1 of the KSRs is deleted.
- The amplification section refers to the North West Quarter Masterplan.

**CC 020: McClintock Street/Bains Place**
**CC 042: Academy Street**
**CC 043: Talbot Street/Exchange Street West/Edward Street/Exchange Street**
**CC 044: Edward Street/Little Edward Street/Dunbar Link**
**CC 046: Talbot Street/Hill Street**
**CC 091: Lanyon Place**
**CC 095: Pottingers Quay, Short Strand**
(Objections 130/7, 897/5, 1589/14 & 15, 2242/1, 3219/6/7/8 & 18)

We note that these DOSs have been redeveloped. Given this, there is no need for the zonings in the Plan. We recommend accordingly.

**Recommendation**

We recommend that the above DOS zonings are deleted.

**CC 048 - 27-29 Gordon Street**

In view of our conclusions in Part 1 of our report, KSRs are a matter for the Department to consider. Although no specific arguments were presented, we note that the proposed KSR for CC 048 is a matter addressed by regional policy and should therefore be deleted from the Plan.

**Recommendation**

If the DOS is confirmed, the KSR should be deleted.
CC 049: Cathedral Way, North Street, Donegall Street, Lower Garfield Street and Rosemary Street

(Objection 3803/1)
The issues regarding the extension of the DOS to include the full North East quarter and the priority status of the site were not raised in the original objection and we are unable to deal with them.

While the Department had no objection to the inclusion of the lands as set out in the original objection, in view of our conclusions in Part 1 that occupied buildings should not be included in a DOS, we disagree that the boundary should be amended to include these properties. We recommend no change to the Plan.

Objection 9/1
The objector sought the removal of 41-51 Royal Avenue from the DOS. As these are occupied buildings we do not consider that they should be included within the DOS.

Recommendation
We recommend that 41-51 Royal Avenue is removed from the DOS.

CC 055: Westlink/Grovenor Road/Durham Street

Objection 2965/33
A DOS does not prioritise or favour development sites and therefore we do not agree with the objector that the designation of zoning CC 055 would undermine the regeneration of the city core. We recommend no change to the Plan as a result of this objection.

Objection 3537/2
See objection to CC 015.

The objector also sought the removal of bullet point 5, as it was the only DOS which specifically refers back to the Key Design Criteria for the Character Area - Great Victoria Street Character Area. We agree it is unnecessary to repeat the KDC which are set out elsewhere in the Plan.

Recommendation
We recommend that bullet point 5 is deleted.

CC 058: Grosvenor Road/Hutchinson Street
(Objection 1346/1)

This was an objection to the Technical Supplement which is not part of the Plan and therefore cannot be considered. We recommend no change to the Plan.
CC 067: Ormeau Road/Donegall Pass  
(Objection 3800/1)

This objection sought the extension of the DOS boundary to which the Department agreed at the Inquiry. We have no reason to depart from this concession if the principle of the DOS is confirmed by the Department.

**Recommendation**

If confirmed, the boundary of zoning CC 067 should be extended as shown on the plans in respect of objection no 3800/1.

CC 069: Mays Meadow  
(Objection 427/1)

This objection from the Markets Development Association sought the alteration of the designation to include a leisure/community use. As we have recommended in Part 1 that land uses should be stipulated for DOSs, we remit this to the Department for consideration, should the DOS be confirmed.

**Recommendation**

If confirmed, the Department should consider a leisure/community land use for zoning CC 069.

CC 070: Stewart Street

**Objection 3762**

The objector sought the identification of the site as an opportunity for long term parking to serve Central Station, hotels and the Waterfront Hall. This DOS site is within the Belfast City Core APR. We have already concluded that individual sites should not be removed from this APR under our considerations of objection 3725. The objector has provided no justification for making an exception to the APR policy on the objection site to facilitate long term parking and we do not favour this use. Accordingly, we recommend no change to the Plan as a result of this objection.

**Objection 427/6**

An objection from the Markets Development Association generally sought the redesignation of this DOS to include a suitable mix of housing types, including a social element to fulfil a local need.

Given the sustainable location of this site and our conclusions regarding the significant shortfall in housing provision in the Belfast area we see merit in the objection; we consider that the site should be zoned for housing rather than as a DOS.
**Recommendation**

We recommend that zoning CC 070 is deleted and the land zoned for housing. The level of social housing is a matter that should be determined by the Department.

**CC 072: Cromac Street/Raphael Street**

**Objection 2965/34**
The objector sought the extension of the zoning to include the cleared site of the former fish factory to the east of the zoning currently being used for car parking, and extensions to include land to the south and land arising from the abandonment of the road protection line. The Department conceded the extension of the DOS and if confirmed, we find no reason to depart from this position.

Although the objector claims no knowledge of a watercourse on the site, consultation responses from Rivers Agency indicate that there is a designated watercourse located within or adjacent to the site and we have no reason to doubt this. We therefore do not consider that reference to it in the amplification section should be removed.

**Objection 427/6**
An objection from the Markets Development Association generally sought the redesignation of this DOS to include housing/mixed use. Given the sustainable location of this site and our conclusions regarding the significant shortfall in housing provision in the Belfast area we see merit in the housing element of the objection. In the absence of further information about the other uses envisaged by the objectors, or the Department’s conclusions on the need for a DOS at this location, we are unable to consider the mixed-use element of the objection.

**Recommendation**

If confirmed, we recommend that:

- The boundary of zoning CC 072 should be extended as shown on the plan submitted with objection 2965/34.
- Consideration should be given to appropriate land uses in the context of the objection submitted.

**CC 076: Little York Street/Shipbuoy Street**
(Objection 3837/1)

This was a general objection to the key site requirements and to the failure to identify the land as a Gateway site. In view of our conclusions about KSRs this is a matter for the Department to consider. There was no explanation as to why the land should be identified as a Gateway site, or be treated differently from other DOSs, that would enable our consideration of the matter. We recommend no change to the Plan.
CC 080: Corporation Street/Trafalgar Street  
(Objection 3219/15)

This objection stated that planning permission is in place for offices for much of the site and objected to the site’s exclusion from the Main Office Area. In light of our conclusions in Part 1 that there is no need for a Main Office Area in Belfast and that offices should be allowed throughout the defined City Centre in the Plan, the objection has been addressed. We recommend no change to the Plan.

CC 082: Tomb Street (North)  
(Objections 3219/10 and 3219/11)

These objections were to the exclusion of adjacent land at Tomb Street/Corporation Square/Donegal Quay in BHC ownership from the DOS, and the exclusion of the land from the Main Office Area. The objection also sought that land owned by Royal Mail at Tomb Street/Donegal Quay should be included. In the absence of any maps indicating the specific lands referred to, we are unable to comment any further on this element of the objection. In light of our conclusions in Part 1 that there is no need for a Main Office Area in Belfast and that offices should be allowed throughout the defined City Centre in the Plan, this part of the objection has been addressed. We have recommended that the new railway station at Gamble Street is deleted from the Plan. Accordingly, we recommend no change to the Plan.

CC 085: Sydenham Road/Queens Quay  
CC 086: Station Street Flyover  
CC 087: Station Street  
CC 088: Middlepath Street  
CC 096: Bridge End  
(Objection 3219)

This objection was to the urban design criteria of the Laganside North and Docks Character Area being strictly imposed within the above particular DOSs. There is no reason why zoning as a DOS should exempt proposals from policies that apply urban design criteria in City Centre Character Areas. It will be a matter for the Department to determine whether the DOS zoning is appropriate. We recommend no change to the Plan.

There was also an objection to the sites’ exclusion from the Main Office Area. In light of our conclusions in Part 1 that there is no need for a main office area in Belfast, and that offices should be allowed throughout the defined City Centre in the Plan, this part of the objection has been addressed. We recommend no change to the Plan.
CC 087: Station Street  
CC 088: Middlepath Street  
CC 089: Dalton Street  
CC 096: Bridge End  
(Objection 3836/1)

This was a general objection to the KSRs. In view of our conclusions about KSRs this is a matter for the Department to consider. We remit this to the Department and recommend no change to the Plan.

CC 090: Sirocco Works, Bridge/Short Strand  
(Objection 3724/1)

This objection was to a number of the key site requirements for the above development opportunity site, arguing that they are overly prescriptive. In view of our conclusions about KSRs this is a matter for the Department to consider. We remit the issues raised to the Department and recommend no change to the Plan.

**OBJECTIONS SEEKING ADDITIONAL DEVELOPMENT OPPORTUNITY SITES**

2892 - Site between Botanic and University Road  
2218/2 - Site at Bruce Street.  
3175/1 - Quay Gate Business Park

These objections sought lands to be identified as DOSs. Objection sites 2892 and 2218/2 are zoned as committed housing sites, CC 03/04 and CC 03/01 respectively.

We have already acknowledged the shortfall in housing allocation in Belfast. The sites have planning approvals for housing and we disagree with the objector that restricting their use to only housing is inappropriate. We recommend that the zonings are retained and there is no change to the Plan.

The objector has not said why site 3175/1 at Quay Gate Business Park should be designated as a DOS. We note that there is an occupied building on the site and refer to our conclusions in Part 1 of our report. We do not consider it should be zoned as a DOS. Accordingly, we recommend no change to the Plan.

**Land adjacent to the Seacat Terminal**  
(Objection 2015/6)

This objection referred to City Centre Character Area designation CC 018, but actually sought the zoning of a DOS on lands around the Seacat Terminal in the event that the latter is relocated. We consider that this site should be designated as a DOS and remit the matter to the Department for its consideration of an appropriate land use for the site.
Recommendation

We recommend that a DOS should be identified at the lands around the Seacat Terminal adjacent to designation CC 082, the extent of which is indicated on the plan accompanying objection 2015/6, and that the Department considers the issue of land use.

BELFAST CITY CENTRE TRANSPORTATION AND PARKING

Objections to Proposal CC 098 - Non Strategic Road Scheme City Centre Ring - Southern Section including Bankmore Link
(Objections 430/18, 471/5, 666/1, 698/9, 812/8, 820/7, 961/3, 1221/6, 1419/1, 1494/2, 1941/6, 2791/7, 2809/7, 2965/69, 3826/2, 4257/7)

Objections to this proposal were wide ranging but primarily related to the need for the scheme, its impact on residential communities in the inner city and concerns about impact on air quality as a result of increased traffic. Plan Amendment No 1 clarified that the scheme has three elements - two are junction improvements at Grosvenor Road/Durham Street and Durham Street/Albert Street/College Square North to which there were no specific objections. The specific concerns related to the detail of the proposal between Sandy Row and Cromac Street/Ormeau Road.

Consideration of the need for the scheme must be placed in the context that much of the City Centre Ring is already in place and this proposal will complete the final section; as such, it is not a free-standing proposal but represents the completion of a much more extensive scheme. It is also significant that it mostly makes use of existing infrastructure and does not introduce traffic into this area that is not there already. It provides a more direct route that aims to ease congestion and segregate through traffic from city centre traffic by widening Hope Street, Bruce Street and Cromac Street which are already heavily used by city centre traffic and linking Bruce Street directly with Cromac Street/Ormeau Road via an improved Bankmore Street. This will ease congestion on Ormeau Avenue but it will also bring traffic closer to residential properties at Maryville Street, Craigmore Way and Erin Way. We acknowledge that by introducing two lanes in each direction the proposal will represent a greater physical barrier than the existing roads and will have the capacity to carry higher volumes of traffic. The City Centre Ring, however, is one of four measures proposed in BMTP for the City Centre and can not be considered in isolation from the other three for the Civic Spine, Belfast Cross and High Accessibility Zones which are focussed on greater permeability by pedestrians, cyclists and public transport. We consider this proposal to be fundamental to the success of the other three in that it is aimed at enabling traffic to circulate around the periphery of the City Centre rather than through the central area in order to secure the other benefits. We therefore disagree with Belfast City Council that re-opening the route between Chichester Street and Oxford Street to through traffic would obviate the need for the Bankmore Link as it would undermine an important element of the City Centre Ring.

We note that the scheme is intended to accommodate displaced rather than increased capacity but there is no guarantee that it will not attract more traffic. We agree with the
Council that the aim should be to reduce demand rather than shift traffic from one place to another. It is important, therefore, that the Department ensures that road improvement schemes are not prioritised at the expense of other wide ranging measures in BMTP aimed at reducing reliance on the car.

We acknowledge that the proposal will increase physical separation from the City Centre. In the case of the Markets area, it has the potential to further isolate the two parts of the community. We note the Department’s evidence that designing for pedestrians and cyclists is an integral part of the detailed scheme design. BMTP also identified the need for high quality pedestrian and cycle crossings to ensure that the core was not severed from the inner city. While current road layouts and traffic conditions already have a significant impact on inner city communities, we consider it particularly important that the Department gives careful consideration to the design features of the proposal to maximise linkages between the city centre and these communities and to ensure that the ‘orbital boulevard’ proposed in BMTP is designed to provide a high quality streetscape. These are matters of detail that are not appropriate to the development plan process and provided they are sensitively addressed, we are satisfied that the proposal will not have a significant adverse impact on surrounding residential areas.

We note the Department’s evidence that a net improvement is predicted in air quality across the City Centre as a whole as a result of the proposal. We are satisfied that this is a matter that will be addressed more fully in the environmental statement accompanying the detailed proposal. We also note that concerns about commuter parking are to be addressed through residents’ permit schemes. While we appreciate the concerns about the lack of detail available in relation to a wide range of impacts, the Department has indicated that there will be a further opportunity for public participation on the detail of the scheme. It has also indicated that what is being sought through the development plan process is a protection line for the road that will be subject to option, economic and environmental appraisals in due course. Overall we are satisfied that such protection is justified and that the proposal is consistent with an important theme of the RDS aimed at urban renaissance and renewal. We recommend no change to the Plan as a result of these objections.

Objections to Proposal CC 099 – Pedestrian/Cycle Bridge Crossings

CC 099/01 - Corporation Square to Queens Quay
(Objections 831/17, 2015/7 & 8, 2666/9 and 2965/36)

Concerns were raised that the proposal would be used for public transport and not just pedestrian/cycle facilities. The origin appears to be a remark on page 50 of Technical Supplement 6 - Urban Environment. This is despite the title of the proposal in the Plan. The Department confirmed that the proposal is for a pedestrian/cycle bridge only. We consider that this is perfectly clear in the Plan and a technical supplement cannot alter this. There is no change required as a result of these objections.

There were claims that the siting of the bridge was not optimal and actually severed the Seacat terminal building. We note that this terminal appears to be closed and fenced off. It could be re-developed in the future. The objectors claimed that existing and
potential harbour uses could be compromised by the position as shown. Belfast City Council considered that the bridge should be re-located further to the north so as not to duplicate the existing crossing at the Lagan Lookout (weir). This would provide a better link from the north of the city to Titanic Quarter. The Department confirmed that alternative locations could be considered. This does raise a question about the status of the line on Map 2/001. We consider that the only remedy is for the proposal to be shown as an indicative line and that the text should reflect that status. The precise locations will presumably be confirmed after further study and consultation.

There was an original objection to the annotation of Grosvenor Road Police Station with CC099 on Map 2/001. This was an error as detailed in the Department’s list of errors. It should refer to City Centre Character Area CC009. We note that this has been corrected on the map accompanying Plan Amendment No. 1.

**CC 099/02 - Gasworks to Ormeau Embankment**  
(Objection 2965/37)

The objection to this proposal was that the route should be re-assessed to ensure a link between trip generators and ensure integration with the existing cycleways and pedestrian routes. As before, the Department confirmed that alternative locations could be considered. We fail to see the objectors’ point in this case. The proposal is a footbridge and so must cross the river. It is located approximately halfway between the existing Albert and Ormeau bridges. It links the riverside walks on each side of the river and is adjacent to the pedestrian access to the Gasworks, the Ormeau embankment and Ormeau Park. We consider that this is an appropriate location in general terms. The Departmental response could presumably be referring to minor amendments to the location. Again this raises a question about the status of the precise line on Map 2/001. We similarly consider that the only remedy is for the proposal to be shown as an indicative line and that the text should reflect that status. The precise locations will presumably be confirmed after further study and consultation.

**Recommendation**

We recommend that the Proposals CC 099/01 and CC 099/02 be shown on Map 2/001 as indicative lines and that the amplification is amended to refer to this and to the fact that the locations will be confirmed after further study and consultation.

**Objections to Proposal CC 100 - New Railway Station, Grosvenor Road**  
(Objections 130/11, 2917/4, 2965/38 and 3537/4)

The background to this scheme is that it is not included in BMTP, although it is referred to in paragraph 5.29 as being in the longer term 2025 Strategy. It continues that the schemes will be progressed should circumstances arise and implementation within the period up to 2015 will be sought. The objectors’ principal concern related to any proposal to move the Station further away from the City Centre. We would share the concerns of Belfast City Council and Rail 21, that moving the station further out on Grosvenor Road would not assist sustainability or passenger numbers. We agree that the current location with a covered mall leading to Great Victoria Street is as close to a
city centre rail station as is possible given the existing infrastructure. The objectors make the point that buildings can be erected above stations if necessary and they point to other cities where this has been done. The evidence was that the existing station works well and has an innovative platform and track configuration that allows for multiple services at the same time.

The Department's case is weak on several counts. The proposal is in the Plan despite not being included in BMTP. Presumably it is included to protect the necessary land. The possible site is within DOS CC 055 and it was agreed that the key site requirements and Masterplan for that DOS can refer to the need to accommodate the new Station. The proposal in the Plan is merely a circle on the site of the existing station. This would not safeguard land at the Grosvenor Road site. The existing station as operational land would already be within the control of Translink.

The other problem with the Department's case is that the proposals for the Station have not been formulated in any detail. We do not have the information to assess how the objectors' perfectly valid concerns will be addressed. We consider that the location and accessibility of the City Centre rail station is a matter of public concern. We cannot endorse a new proposal that could potentially re-locate the rail station further away from the City Centre merely on the principle that the relevant transport authorities and Departments know best. We cannot see the basis for omitting the proposal from BMTP and yet including it in BMAP. The Department’s answer to criticisms was that the proposal was in the very early stages and would have to complete the statutory planning processes. If no details are available then we cannot be re-assured by their comments that the station would be closer to Great Victoria Street than Grosvenor Road, particularly as it is described as Grosvenor Road in the Plan.

We agree with the objectors that the proposal should be deleted from the Plan because it is premature to include it at this juncture.

**Recommendation**

We recommend that Proposal CC 100 is deleted from the Plan.

**Objections to Proposal CC 101 - New Railway Station, Gamble Street**

(Objections 2015/9, 2917/5 and 3219/20)

The background to this proposal is the same as that for CC 100 above. The objections referred to the importance of the proposal and that it should be a priority for the Plan period and not delayed. Laganside Corporation considered that public sector funding should act as the catalyst for private sector investment, given the proximity of the proposal to Laganside, the City Centre, Clarendon Dock and the Odyssey/Titanic Quarter. The arguments related to such matters as the cost of the proposal, whether it needs to be an interchange rather than a rail halt, whether the rail bridge across the Lagan to the east needs to be improved and whether York Street Station should be closed as a result of this proposal. These are matters outside the scope of the Plan. We must take the same position as we did for the other proposal that is not in BMTP and not programmed for the Plan period (i.e. CC 100 above). The proposal should be deleted from the Plan. The Plan could refer to the proposal in general terms. It is
difficult to see how a new rail station could be implemented more quickly given the current economic climate. However, it appears to be on operational land and could therefore be progressed whether or not it is in the Plan.

**Recommendation**

We recommend that Proposal CC 101 is deleted from the Plan.

**Objections to Designation CC 102 - Area of Parking Restraint, City Centre**
(Objections 897, 2015, 3327, & 3725)

It is not possible to remove an individual site from the Area of Parking Restraint (APR) as suggested in objections. This would leave a gap in the middle of the City Centre to which the policy would not apply, which is clearly illogical. The objection provided no evidence or justification other than seeking to ensure that there were as few limitations on the re-development of the site as possible. This is not a reason to delete a justified policy provision from the site. We also note that the site has now been re-developed, in any event and yet the objection has not been withdrawn.

Objection 2015 makes the point that most of Clarendon Dock is within the City Fringe APR, but a small part south of Corporation Square and north of the M3 flyover is within the City Centre core APR. We agree that this represents an unnatural differentiation at this location and consider that the City Centre APR should terminate at the M3 motorway. This land would then fall within the City Fringe APR.

The other objections related to individual DOS and these aspects have been addressed in the consideration of Designations CC 035, CC 067 and CC 070.

**Recommendation**

We recommend that Designation CC 102 should be amended to exclude the small area between the M3 flyover and Corporation Square from this APR and include it within the City Fringe APR.

**BELFAST CITY CENTRE URBAN ENVIRONMENT**

**OBJECTIONS TO CITY CENTRE AREAS OF TOWNSCAPE CHARACTER**

**CC 106: Victoria Street/Oxford Street**
(Objection 811/2)

Our conclusion in Part 1 of our report was that Policy UE3 should be deleted and a detailed character analysis undertaken and design guide produced for each individual ATC.

As objection 811/2 related to policy UE3 and how it affects CC 106, we are unable to consider the objection further. Accordingly, we recommend no change to the Plan.
BELFAST HARBOUR AREA (BHA)

The importance of BHA is recognised in the RDS in terms of enhancing the role of Belfast. The port of Belfast and the City Airport are regional gateways and the key urban regeneration role of the riverside renewal and Titanic Quarter is emphasised (BMA 1.1). The economic development, employment and tourism potential of the area is stressed (BMA 2.1 and ECON 3.1). Finally the environmental assets of this coastal location are highlighted (ENV 2.1). The Plan devotes a chapter to the BHA in Part 4 Volume 2, which begins with a BHA strategy.

Objections to the BHA Strategy
(Objections 831/1, 2015/10 & 16, 3311/4 and 3568/14 & 32)

The BHA Strategy on page 104 seeks to recognise the important role for the BHA envisaged by the RDS and provide a spatial framework with 4 elements:

The objections related to the failure of the strategy to recognise the strategic significance of BHA and a failure to capitalise on the gateway role of the City Airport. At the hearing the agents for Belfast Harbour Commissioners and the City Airport tabled a revised BHA strategy. The revisions to the strategy firstly consisted of a revised wording for the two introductory paragraphs as follows:

“BHA has a critical role to play in realising the RDS strategic vision for Belfast City both in its promotion as the regional capital and a focus for employment opportunities and also in providing a high quality gateway to Northern Ireland.

The port of Belfast is identified as a Special Economic Zone recognising its strategic economic importance. The Department will exercise its Development Management functions to facilitate economic development and expedite planning processes.”

The bullet points of the strategy itself were not altered in the objectors’ submission. The list of planning actions was altered to delete the minor bullet points under the first action of designating Titanic Quarter. The second last bullet point relating to LLPAs and SLNCIs was altered by changing the first word (Protection) to the phrase “Appropriate protection of those”. It was recognised that this list might need to be altered as a result of objections to the other policies, proposals and designations in the BHA. We urge the Department to take particular note of this point and make any necessary amendments to this list as a result of their conclusions on other objections.

The suggested amendments to the strategy were generally acceptable to the Department subject to some caveats. There was no basis for the term Special Economic Zone. The Department suggested that the second paragraph in bold type should read: “the strategic economic importance of the Port of Belfast is specifically recognised. The Department will exercise its development management functions to facilitate appropriate economic development.” There was considered to be no need for the phrase “and expedite the planning processes” because this was a general development management issue which was not appropriate for the Plan.
We have already concluded that BHA as a regional gateway in the RDS should be at the top of the list of employment sites in the employment strategy. As such the position of BHA as been secured and there is no need to invent new terms to describe its role. We discern no further issue with regard to setting out the position of BHA in the employment strategy. We agree with the Department that there is no basis for the term Special Economic Zone, as there is no basis for Major Employment Location. We also agree with the Department that the addition of the word “appropriate” before “economic development” is necessary and that there is no need for the phrase “expedite the planning processes” for the reason given. The reduction of the bullet point on Titanic Quarter in the list of actions is to be welcomed and other actions will have to be re-visited as discussed earlier.

The objectors also suggested some amendments to the background section prior to the BHA strategy. These consisted of additions and deletions to the introductory paragraphs and the deletion of the quotations from RDS policy; to be replaced by several sentences explaining the RDS objectives. The Department was broadly content with this approach subject to minor alterations. We recommend that the Department considers revising the final text to reflect this approach. We see no need for repetition of RDS policy in the Plan and commend the deletion of this page of quotations.

Objection 3311 to the BHA Strategy failed to provide any basis for the objection and so cannot be considered further. Objection 831 referred to the role of Titanic Quarter and its importance in the light of the RDS and to Belfast as a whole. This matter will be considered further below under BHA01.

**Recommendations**

We recommend that

- The first two paragraphs under the heading BHA Strategy on page 104 are altered to read as follows:

  “BHA has a critical role to play in realising the RDS strategic vision for Belfast City both in its promotion as the regional capital and a focus for employment opportunities and also in providing a high quality gateway to Northern Ireland.

  The strategic economic importance of the Port of Belfast is specifically recognised. The Department will exercise its development management functions to facilitate appropriate economic development.

  The objectives are to: ....”.

- The list of planning actions is amended to remove the list of uses that will be provided in Titanic Quarter and further amendments are made as necessary in the light of the outcome of other objections.
TITANIC QUARTER

Objections to Zoning BHA01- Titanic Quarter

(Objections 130, 587, 808, 809, 831, 854, 947, 948, 1391, 1469, 1477, 1604, 1803, 1807, 2015, 3475, 3568 and 3824)

Zoning BHA01 in the draft Plan (as altered by the Plan Amendment) comprises over 6 pages of key site requirements. Titanic Quarter is split into 7 zones: A to G. There are 14 general key site requirements and 3 – 5 key site requirements for each Zone. The objections to the zoning were principally concerned with these key site requirements, the sub-division into zones and the range of appropriate land uses within the zoning. This also related to the issue of potential effects on the operations of the existing port users. The need for a comprehensive masterplan and the terminology used, the built heritage of the area and transportation were the remaining issues. At the time of writing this report, approval has been granted for the first phase of the Titanic Quarter development and many of these buildings have been completed. The Titanic Signature project and a campus for the Belfast Institute of Further and Higher Education are under construction.

There was an argument that there was no need for key site requirements to control every aspect of the development of Titanic Quarter because it would be addressed by the Development Framework (DF). This is not the DF as indicated in the Plan at Map 3/002 (changed to Map No. 4 of the Plan Amendment 1). Rather it is a DF submitted by the developers and approved by the Department. We consider that this could lead to confusion and that the Department should delete these Maps from the Plan and if any Maps of Titanic Quarter are considered to be necessary a different title should be used. The Department's concern was that the DF could change over time, but key site requirements were permanent. This loses sight of the fact that the DF would have to be approved by the Department and can therefore be controlled to be in accord with their requirements. The DF is for the overall development of Titanic Quarter and should not be subject to change once approved. We understand that the DF has been agreed.

That being said there appeared to be universal agreement that there was a need for some key site requirements to be included and we agree with this. The remainder of this section will consider those key site requirements on a topic basis. There will then be a composite recommendation at the end of the section.

Prescriptive Requirements

The Department dropped the splitting of Titanic Quarter into zones in the course of the Inquiry, with the exception of a single zone A around the existing Channel Commercial Park (NE portion of Titanic Quarter). This zone A would be restricted to general or light industrial and storage & distribution uses. We do not consider this zone to be necessary and that the appropriate mix of uses should be left to the DF. We agree with the Department that a list of normally acceptable uses should be included in the key site requirements for the avoidance of doubt. We will consider the extent of those uses further below.
The Department required that minimum and maximum building heights of two to six stories be specified. These maximum heights have already been exceeded in Phase 1 of the development, currently under construction. There were to be exceptions for landmark buildings at key locations. Criteria for the consideration of other variances were set out. We consider that these matters are appropriate for the DF and masterplans for the site. The Department would retain control over the proposals and could use the criteria to assess the DF and more detailed proposals. We are conscious that the objectors suggested an alternative key site requirement for assessing building heights, etc. For similar reasons we consider that this is not necessary. The suggested key site requirement relating to building facades and plot widths is a detailed matter to be addressed in the DF and in the masterplans.

**Offices**

We have already recommended that Titanic Quarter should not be included in Belfast City Centre and the remainder of this section therefore focuses on the amount of Class B1 offices that should be allowed in Titanic Quarter.

It was clarified in the course of the Inquiry that the phase 1 approval included a gateway office development of 11,200m², which is currently under construction. The Department accepted that Business Use Classes B1 (b) & (c) would be acceptable on employment sites and therefore would be acceptable in Titanic Quarter. The Department considered that no more than 5,000 m² of Class B1 (a) – offices should be allowed in order to protect Belfast City Centre. The Department was willing to include an exceptional clause to allow an office use that could not locate in the City Centre or would result in the loss of investment to Belfast. Belfast City Council (counter-objectors) agreed with this approach. The objectors required 80,000m² of office floorspace to be accommodated, in addition to that already approved.

The reasoning of the objectors was that the exceptional clause would not provide a sufficiently rapid response to the footloose nature of the office developments that were envisaged. The type of modern office that would locate in Titanic Quarter would not choose a city centre location it was argued. The Department and Belfast City Council argued the converse and that the City Centre could accommodate the needs for modern offices. They argued that Titanic Quarter is in direct competition with and not in any way complementary to the City Centre. We have recommended in Part 1 of our report that the Main Office Area in the City Centre be deleted and offices allowed anywhere in the City Centre. This will afford more opportunities for offices to locate in the City Centre, The Department did not explain why 11,000m² of offices had already been approved in Titanic Quarter, but presumably this was under the exceptional clause in the draft Plan. Our conclusion is that this exceptional approach has worked in the past and there is no reason to suppose that it would not do so in the future. However, we recommend that the Department corrects the floorspace figure in the draft Plan in the light of the level of offices already approved. This figure in the key site requirement reflects the total amount of office floorspace already allowed in Titanic Quarter and the amplification should make that clear.
Housing

The Department’s suggested key site requirement was agreed by the objectors and so there was no issue remaining. The other objections that there was too much housing allocated to Titanic Quarter at the expense of elsewhere and in regard to social housing have been considered in the strategic part of our report. We have concluded in Part 1 of this report that there is scope for more housing in Titanic Quarter. The RDS advocates the provision of balanced communities. We have also concluded that there is an urgent need for social housing and that affordable housing is a matter for regional policy to address. In these circumstances, we cannot agree with the use of the term affordable housing in the key site requirement and consider that it should refer to social housing, as it did in the draft Plan. There is scope for flexibility in the 10-15% range specified in the key site requirement.

Retailing

There was agreement between the Department and the objectors that the proposed retailing key site requirements would adequately provide for an appropriate level of retailing for Titanic Quarter commensurate with its cultural, tourism, regeneration and employment roles. We concur and recommend accordingly.

Relationship with Existing Port Uses

These objections related to the basic issue that there could be prejudice to the existing port operations of Harland & Wolff, the coal companies and silo companies from residential uses close to their operations. All these objectors were represented at the Inquiry. There had been some preliminary discussions and agreements reached. We were presented with agreed key site requirements at the Inquiry and all parties expressed satisfaction that the final two key site requirements related to Diagram A reproduced below in the recommendations would address the issues. Two key site requirements were necessary to cover the scenarios of infilling the serrated dock edge at Alexandra Dock or not.

These key site requirements refer to Diagram A, which is an annotated aerial photograph submitted to the Inquiry by Turley Associates on behalf of Titanic Quarter Ltd. (Reference TQLB0001). There was a remaining issue regarding the accuracy of the Harland & Wolff boundary as shown in the Plan documents. The correct boundary was shown on Diagram A. The Department promised to rectify this error in the adopted Plan.

Heritage Issues

The Department required that the listed buildings and scheduled monuments on the site be retained and integrated into the development. These features were individually named and it is expected that heritage/cultural uses should be accommodated in listed buildings where possible. The impact on the protection of listed buildings or
monuments and their settings was to be a factor in assessing proposals to vary building heights. We agree that the list of buildings and monuments does not need to be in the key site requirements. Protection of listed buildings or monuments and their settings is a statutory requirement and should be addressed in the DF and masterplans. The aspirational matters of uses being accommodated where possible is not a requirement. We consider that all of these matters could be referred to in the amplification and shown on maps accompanying the Plan.

There was a key site requirement proposed by the Department related to the retention of the serrated dock edge adjacent to Alexandra Dock. The issue as to whether the seabed and water’s edge adjacent to the Olympic and Titanic slipways were scheduled and whether any works would require scheduled monument consent is a detailed matter that can be controlled as part of the masterplan and development management process. Scheduled monument consent is a separate statutory process. We note the objectors’ concerns and that NIEA confirmed there was no blanket embargo on works in this area, but that it was an important part of the site. We consider that this is a detailed matter that should be left to the masterplan process. We consider that the objector’s suggested key site requirement would flag up the issue:

“The overall design concept shall have particular regard to the important maritime heritage of the site, the site’s tourism potential and the need for connectivity with the rest of the City Centre.”

We agree that the listed buildings and scheduled monuments can be referred to in the amplification and this could refer to the statutory duties in respect of these features and that careful consideration would have to be given to any proposals to infill the dock edges. As discussed above, we agree that the Department’s suggested uses for listed buildings are aspirational and do not constitute requirements and as such can also be referred to in the amplification. This can also refer to the re-use of any other historic structures (as per objection 1469).

It was clarified that the Department’s requirement for a structural survey of the dock edges was not a standard survey because it related to above and below the water line. The objectors pointed out that this information could be required as part of the development management process and that there was no such requirement for other riverside development opportunity sites in the Plan (e.g. CC085). It was argued that to elevate this survey to a key site requirement would imply that other surveys were not required. They stated that the survey ought to be done and would be undertaken. We agree with the objectors and see no need to add this requirement to the list.

**Open Space and Landscaping**

The Department’s requirements included that open space be provided in accordance with Policy OS4 of the draft Plan, which was different to regional policy in PPS8. We have recommended in the strategic section of our report that Policy OS4 be deleted from the Plan. This key site requirement therefore must be deleted and the matter left to the other key site requirements (which address linkages between heritage nodes) and regional policy. The Department’s suggested landscaping key site requirements
related to the submission of a landscaping scheme with planning applications and landscape management proposals. We agree that these read like planning conditions and are not necessary to be specified in this way. These matters can be addressed in a general way as suggested by the objectors.

Transport and Access Issues

The Department’s key site requirements included reference to the function of several roads. It was accepted that some of these requirements were not achievable and they were dropped. Harland and Wolff objected to the potential use of Hamilton Road as an East-West link within Titanic Quarter because part of this road is within their operational area and any restrictions on their use of the area could prejudice the viability of the business. The Department accepted that this was merely an aspiration and agreed that it could be deleted. The Department also dropped key site requirements related to the grid of streets based on the existing street patterns. We consider that the matters of access, public transport, pedestrian and cycling facilities, linkages and a transport masterplan can be addressed by the DF and key site requirements as suggested by the objectors. The objectors agreed that a key site requirement related to the provision of a new interchange from the A2 into the harbour area was appropriate. We consider that there is no need for a key site requirement related to the CITI rapid transit route access points because of our recommendations on that plan proposal (BHA12) elsewhere in this report. There is no need for a key site requirement related to transport assessments to accompany planning applications as this is covered by regional policy.

Other Issues

There was an objection (3311) that zoning BHA01 failed to protect the Odyssey complex and its setting. This objection was not explained or expanded upon. In any event, the development closest to the Odyssey was approved prior to the commencement of the Public Inquiry (i.e. Phase 1) and so any consideration of this argument would be academic.

There was an objection (854) to minimum building heights aimed at allowing motor dealers to locate in Titanic Quarter. This is a detailed development management issue which has no place in an Area Plan. We have considered the building heights issue above.

Recommendations

We recommend that the precise boundary of Titanic Quarter be correctly defined and the site area be correctly specified. The objectors’ diagram A or similar should be used.

We recommend that the key site requirements are as follows:

- Development of the site shall only be permitted in accordance with an overall Development Framework for this new city quarter, to be agreed with the Department.
The Development Framework shall outline:

- The overall design concept, objectives and priorities for the site.
- A block structure defined by a hierarchy of routes and spaces.
- Appropriate scale and massing of building blocks.
- Appropriate mix of uses.
- Appropriate open space and public realm.
- Appropriate landscaping.
- Appropriate public transport and car parking provision.
- The proposed phasing of the development.

The Development Framework shall be accompanied by a Transport Masterplan for the site, to be agreed by the Department.

The overall design concept shall have particular regard to the important maritime heritage of the site, the site’s tourism potential and the need for connectivity with the rest of the City Centre.

The Development Framework shall provide for a minimum of 3,500 dwellings of which 10-15% shall be developed for social housing to be dispersed through Titanic Quarter.

Transportation proposals shall include provision for appropriate public transport for the site, connecting it to the core of the City Centre and necessary improvements to off-site infrastructure, in the form of a new interchange from the A2 into the Harbour Area.

Provision shall be made for appropriate pedestrian/cycle routes and facilities throughout the development including connections between the heritage nodes (see Diagram A) and along the dock edges, connecting with the Odyssey Arena’s waterfront cycle/walkway and existing onward connections to the City Centre.

The following uses will be considered to be acceptable in Titanic Quarter:

- Residential
- Educational
- Cultural/heritage
- Retailing of a scale to complement Titanic Quarter’s cultural and heritage offer subject to demonstration of the relationship with tourism.
- Retailing to meet the requirements of the residential and employment community, subject to it being clearly demonstrated that this is intended to meet local need only.
- Recreation/Leisure
- Cafes/Restaurants
- Hotels
- Banks or Building Societies (as currently specified in Class A2 of the Planning (Use Classes) Order (Northern Ireland) 2004).
o Business Uses (as currently specified in Class B1 (a), (b) or (c) of the Planning (Use Classes) Order (Northern Ireland) 2004). The total amount of floorspace for Use Class B1 (a) Offices shall not exceed 11,000 sq. m. Consideration may be given to office proposals above 11,000 sq. m. where it can be demonstrated that the proposal cannot be accommodated within Belfast City Centre and which would otherwise result in the loss of significant inward investment. Note: the Department is to re-consider the actual floorspace figure as discussed under the heading Offices above.

o Light Industrial Use as currently specified in Class B2 of the Planning (Use Classes) Order (Northern Ireland) 2004.

- The yellow line on Diagram A defines the first line of potential development within the site alongside the Harland & Wolff facility. In order to safeguard the existing shipyard operations, no residential or hotel development shall be permitted along this frontage. Where there is a vertical frontage gap between buildings in this frontage, any buildings constructed along the second line of development and within a frontage gap shall be non-residential and non-hotel use. Any hotel or residential building located in the second line of development shall not be excessively taller than those buildings built along the first line of development.

- Where the serrated dock edge is retained in the Alexandra Dock area as shown on Diagram A, the land side of the dock edge as defined in the light green line shall be the first line of potential development. No residential or hotel development shall be permitted along the land side of the dock edge. Where there is a vertical frontage gap between buildings abutting the land side of the dock edge, any buildings constructed along the second line of development and within a frontage gap shall be non-residential and non-hotel use. Any hotel or residential building located in the second line of development shall not be excessively taller than those buildings built along the landside of the dock edge. If the area beside Alexandra Dock is filled in, the land side of the dock edge as shown in dark green on Diagram A shall be the first line of potential development. No residential or hotel development shall be permitted along the land side of the dock edge. Where there is a vertical frontage gap between buildings abutting the land side of the dock edge, any buildings constructed along the second line of development and within a frontage gap shall also be non-residential and non-hotel use. Any residential building located in the reclaimed area shall not be excessively taller than those buildings built along the land side of the dock edge. Any hotel building located in the reclaimed area shall not be excessively taller than those buildings built along the land side of the dock edge. Any hotel or residential building outside the reclaimed area and in the second line of development shall not be excessively taller than those buildings built along the land side of the dock edge.
GEORGE BEST BELFAST CITY AIRPORT

Objections to Policies BHA 02, BHA 03 & BHA 04
(Objection 666/5, 1424/2 & 3568)

Policies BHA 02, BHA 03 and BHA 04 comprise a suite of policies related to development within the boundary of Belfast City Airport as shown on Map No. 3/001. The main objector was Belfast City Airport Ltd. (objection 3568). The objection by them to Policy BHA05 was withdrawn. Belfast City Council’s objection to Policy BHA02 was withdrawn at the Inquiry.

There were two objections (666/5 & 1424/2) that were related to the existing Article 40 Planning Agreement for the airport. The basic issue raised was noise and disturbance as a result of aircraft movements. The Plan does not propose to alter the agreement and makes no provisions related to the number or timing of flights. These matters are outside the scope of this report and we can therefore make no further comment on these objections.

The issue related to these policies resolved into a proposal from the objectors that there should be one policy to address development within the Belfast City Airport boundary. The Department agreed with this approach and wished to add some content from Policy PSU3 of “A Planning Strategy for Rural Northern Ireland”. This policy does not apply to Belfast City Airport at the moment but in view of our recommendations in respect of Policy SETT 6 in Part 1 of this report, Policy PSU 3 of PSRNI would now represent the appropriate regional policy for proposals at the City Airport. It was argued that there was merit in there being a single policy tailored for Belfast City Airport (which is one of only four city airports in Europe) that contains all relevant planning policy in one location. The objectors considered that there was an inconsistency between Policy SETT 6 and BMAP in terms of the application of PSU 3. We are somewhat confused by this argument as the objectors contended in their statement of case that PSU 3 could be interpreted more favourably to benefit Belfast International Airport, which was considered unfair to the City Airport. There was no concern about the alleged inconsistency mentioned in written evidence, where one would have expected all such concerns to have been raised. Rather the reverse appears to be the case in that the objectors argued that PSU 3 would be more favourable to the City Airport. The objectors also pursued this point on the basis that their surplus lands could be affected if their objection that they be excluded from the Airport boundary were to fail. We recommend below that the surplus lands should be excluded. The lands around the airport are zoned for employment uses and this allows for a range uses to be accommodated as discussed in our strategic employment section.

There was a broad consensus between the two parties on the scope and content of the revised single policy and what should be in the amplification. The Department appeared to be solely arguing for the policy on the basis that it was necessary if SETT 6 falls. Having compared the agreed single policy for BMAP with PSU 3, we fail to see what additional policy context is provided by the suggested single policy. The Plan policies only address development within the defined Airport boundary and it is reasonable to expect that development in this location would be directly related to Airport operations and airport-related facilities. Policy PSU 3 gives favourable
consideration to developments of the types envisaged by the objectors and we consider that the suggested BMAP Policy would merely duplicate this regional policy. The objectors did not provide any persuasive case as to why the City Airport should have a different policy than the other airports in Northern Ireland nor did their suggested amendments provide policies unique to the City Airport. The mere fact that it is only one of four such airports in Europe and the argument related to alleged inconsistencies between BMAP and PSRN are not sufficient reasons, in our opinion, to justify the policy. We accordingly recommend that Plan Policies BHA 02, BHA 03 and BHA 04 are deleted.

There would be a need for text related to the City Airport to remain as Policy BHA 05 was not the subject of objection. This text could refer to the planning agreement and regional policy on development at airports. The text could also refer to the agreed list of suitable uses contained in the objectors’ statement of case (with the exception of p), s) and t)). This list was not exhaustive and favourable consideration would be given to other proposals that are clearly related to and dependent on a siting near the airport.

**Recommendation**

We recommend that Plan Policies BHA 02, BHA 03 and BHA 04 are deleted from the Plan.

**Objection Seeking the Exclusion of the City Airport Surplus Lands from the Airport Boundary**

*(Objection 3568)*

This objection sought the exclusion of the surplus lands (the former terminal comprising 10 acres) from the airport and its designation for employment use if that includes offices and if not its designation as an office node. There was a question as to whether this fell within the terms of the original objection. Having examined the original objection we conclude that there is reference to the airport’s surplus lands and their future development. We will therefore address this objection, which was debated at the Inquiry.

The Department’s response was to suggest that the surplus lands be designated for employment use (BHA08) and for airport related uses (BHA02). This would make it suitable for the full range of employment uses and airport uses as discussed above. This would provide a significant degree of flexibility, it was argued. The objectors were content with the Department’s response. We agree with this suggestion and consider that the appearance of the area, which is currently dominated by security fencing and buildings in the course of demolition, is in need of improvement. We will consider the issue of Class B1 Office use in the section on Zoning BHA08 below.

**Recommendation**

We recommend that the airport surplus lands (as identified on Plan x) be designated for employment and airport-related uses as part of zoning BHA08.
PORT OF BELFAST

Objections to Policy BHA06 Port Operations and Port Related Land Uses

The only objection to the policy was from Belfast Harbour Commissioners (2015/11) and related to the wording of the policy itself and what phrases should be in the amplification to the policy. The Department argued that this matter was not in the original objection. The original objection was very specific in detailing the concerns i.e. two matters neither of which related to the wording of the policy. The objectors argued that the use of the phrase anything that is prejudicial to the future development of the Harbour Area and port operations therein allowed for this matter to be introduced. There was also a general objection to the over prescriptive nature of the draft Plan. The objection to Policy BHA06 is set out on the third page of the original objection and only related to two matters neither of which is the wording of the policy itself. One cannot use general phrases introducing a long and complex objection to justify later comments on a specific policy when one has made one’s objections to that policy clear further on in the objection. We therefore conclude that this matter was not in the original objection and cannot be considered in our report.

Objection to the exclusion of the lands known as D3 from the operational land of Belfast Port

This objection was explicitly stated in the original submission. The objectors pointed out that this area was clearly zoned operational land in the Belfast Harbour Local Plan (following a recommendation to that effect in the Commission’s report on the Public Inquiry) and should be reinstated as such in BMAP. A proposal to infill the area had been granted planning permission and consent for works in an Area of Special Scientific Interest in 1993 and 1994. The objectors gave the adjoining Ramsar site to the RSPB and other voluntary groups on the condition that D3 could be used commercially. Since 2001 this land has been used for port activities. The Department accepted this planning history and stated that the area should be zoned for port-related uses as a new zoning. The amplification should state the fact that the land is part of an Area of Special Scientific Interest. The objectors wished to see it as part of BHA08, but would accept a zoning as BHA08A. The area has been infilled and had some storage use at the time of our site visit. We note the level of agreement between the parties that reflects previous deliberations on this land and we judge that these lands should have a separate zoning as suggested by the Department because of its location and status as an Area of Special Scientific Interest.

The other objection under the heading Policy BHA06 has been dealt with in our consideration of the Harbour Area Strategy

Recommendation

We recommend that the area of land known as D3 be zoned for port operations and port-related uses as a new zoning. The amplification should state the fact that the land is part of an Area of Special Scientific Interest.
NORTH FORESHORE

Zoning BHA07 - Employment, North Foreshore
Proposal BHA14 - Park and Ride Scheme, Fortwilliam
Proposal BHA19 - Open Space, North Foreshore
(Objections 959, 1216, 2015, 2965)

There was broad agreement with the proposal that BHA07 and BHA19 should be combined into one mixed use zoning for employment uses, open space and waste management facilities. We see no reason to depart from this approach, which seems eminently sensible and reflective of all the parties’ aspirations for the site. We see merit in a similar approach to that adopted for Titanic Quarter, where suitable uses are identified and detailed matters are to be resolved through a comprehensive masterplan for the site. We agree with the parties that this should be one overall masterplan for the entire site and that this plan should address the phasing of development. The Department dropped any design related key site requirements and the general location of buildings associated with open space can be addressed in the masterplan.

The range of suitable uses must include waste management facilities currently ongoing on the site. Belfast City Council was of the opinion that this should come first on the list in order to reflect the importance of the facility i.e. the only such facility for the city. We were presented with no evidence to rebut this request other than the Departmental statement that there was no merit in ordering land uses and BHC comment that this could be reflected in the amplification. In these circumstances, there is no reason not to accede to the request. Belfast City Council also requested that recycling facilities be added to this category. The Department agreed and so do we.

There was some debate about whether port-related uses should be added to the list, as this was considered to be an element of duplication. We consider that as this is a new zoning in the harbour area, then there should be a reference to port-related uses for the sake of clarity and comprehensiveness. There was also a comment from Belfast City Council that uses in Class B3 and B4 would not be appropriate on the site. We do not agree with this comment and consider that the location may lend itself to these uses as part of a mixed development that does not involve any residential uses. There was no evidence presented to justify office uses on the site. We consider that more suitable locations in the BHA for offices have been specified earlier in our report and that any further allowance in this location could be detrimental to the City Centre. This approach is in accord with Belfast City Council comments on the allowance for offices in other locations.

The parties all agreed that a key site requirement related to protection of the adjacent international and national natural heritage designations was required. The Department agreed that use of the term enhancement in their original suggestion exceeded the legal tests and that protection was more apposite. Such a key site requirement feeding into the masterplan process would address objections 1216/4 and 959/10. These objections sought a suitable buffer between zoning BHA07 and Belfast Lough in order to protect the adjoining designated natural heritage sites.

The Department’s suggested landscaping key site requirements related to the submission of a landscaping scheme with planning applications and landscape
management proposals. We agree that these read like planning conditions and are not necessary to be specified in this way. When we consider what the Department agreed should go into the amplification and the requirement for a masterplan process, then it is clear that these key site requirements are not necessary. These matters can be addressed in the masterplan to be submitted for approval and the amplification can indicate what the likely landscaping requirements will be.

With regard to the highway requirements, there was no dispute that access should be from Dargan Road. There was also no dissent regarding the need for a Transport Assessment. The matters to be included in the assessment are addressed in regional policy and it will be subject to the Department’s approval. The Department indicated that certain minimum improvements to the network should be specified. There was some debate over this issue. The objectors pointed out that this was pre-judging the assessment process itself. There was a high volume of traffic to the landfill site at the moment and so there would be no increase in traffic as a result of the development of the site, it was argued. There was also the complicating factor of the park and ride proposal on the site (discussed below). At the Inquiry the Roads Service witness acknowledged the validity of these points and agreed the key site requirement should not specify any minimum improvements.

Proposal BHA14 - Park and Ride Scheme, Fortwilliam

The Department clarified that the site had been chosen because of its location and the additional benefit that it was a brownfield site in public ownership. The proposal would be a bus-based park & ride, served by a dedicated bus service to the City Centre. The distance from the City Centre is typical of the distance for similar facilities elsewhere in the UK.

There was an objection to this proposal from BHC. The objection sought re-location of the park & ride to the Sandyknowes junction on the M2. The reasons for this were that it would not aid congestion between Sandyknowes and Greencastle and would only remove traffic from a short section of the strategic road network. The proposal would add to congestion at Fortwilliam junction and would prejudice this strategic harbour access. This was especially important in the context of the re-location of the Stena terminal and development proposals for the North Foreshore. Belfast City Council agreed with the concern regarding location and was keen to ensure that this element be separated from the North Foreshore proposals for the purposes of assessing traffic flow and necessary highway improvements.

In response, DRD confirmed that the M2 would be improved to 3 lanes from Sandyknowes to the Fortwilliam junction, which would address the congestion between these points. There are existing park & ride facilities further north and more are planned, including rail-based facilities. The proposed location will pick up traffic from the Carrickfergus and Newtownabbey directions. This location is the optimum distance from the City Centre, as shown by experience over many years in providing such facilities for cities across the UK. Any further out and the scheme would not be viable because too many buses would be required to ensure that the necessary frequency of service was provided. If this were compromised then commuters would not use the facility. The proposal was shown in BMTP at this location and was part of a wider package of measures in the BMTP, including restricting parking in the City Centre. The
The site at Sandyknowes would not work because it would be too far out for a viable bus service. It would miss potential users from the Carrickfergus direction. It would also present planning difficulties due to its Greenfield location.

We note that the M2 has been improved between Sandyknowes and Fortwilliam, which appears to have addressed the issue of congestion at Sandyknowes and on the M2 to Greencastle. We agree with the Department’s rationale for selecting this site and the reasons given for the unsuitability of the suggested alternative at Sandyknowes. The impact of the proposal on the need for highway improvements is a matter for the Transport Assessment process. We therefore recommend that the proposal be retained in the Plan and be referred to in the key site requirements for the mixed use zoning.

**Recommendations**

We recommend that:

- Zoning BHA07 and Proposal BHA19 be deleted from the Plan and be replaced by a new mixed use Zoning BHA07.

- The key site requirements for the zoning be as follows:
  - Development shall only include the following uses:
    - waste management and recycling facilities
    - port and port-related land uses
    - Class B1: Business b) call centres and c) research and development
    - Light Industrial Use as currently specified in Class B2 of the Planning (Use Classes) Order (Northern Ireland) 2004
    - General Industrial Use as currently specified in Class B3 of the Planning (Use Classes) Order (Northern Ireland) 2004
    - storage or distribution use as currently specified in Class B4 of the Planning (Use Classes) Order (Northern Ireland 2004
    - open space and associated facilities
    - park and ride facilities

- Development of the site shall only be permitted in accordance with an overall comprehensive masterplan to be agreed with the Department. The masterplan shall outline the design concept, objectives and priorities for the site, an appropriate mix of the permitted uses including open space and the transition from built development to open space. The masterplan shall outline the proposed phasing of the development, the appropriate scale and massing of building blocks and appropriate landscaping.

- Development proposals shall be required to provide appropriate protection of habitat biodiversity in the adjacent international and national designated natural heritage sites.

- Access to the site shall be from Dargan Road to be agreed with DRD Roads Service.
• A Transport Assessment (TA), agreed with Roads Service, DRD, shall be required to identify any necessary road improvements to the road network/public transport/transportation facilities in the area.

• The Department refers to the likely landscaping requirements in the policy amplification as detailed above.

• No changes are made to Proposal BHA14 as a result of the objections.

**Zoning BHA08 -Existing Employment/Industry, Belfast Harbour**

The objections 1928/3 and 2015/18 were concerned with general issues related primarily to the employment and Harbour Area strategies. The agents confirmed at the Inquiry that there were no remaining matters in respect of these objections and BHA08, apart from Sydenham Business Park.

**Objections related to Sydenham Business Park**

(Objections 2015 & 3415)

The objections sought flexibility for the business park. The history of its development was explained. Belfast Urban Area Plan had allocated the site for industrial and commercial development. Belfast Harbour Local Plan stated that the Department accepted the need for a flexible approach to the type of uses that might be permitted, taking into account locational factors. This had led to a range of uses being permitted at the business park. The objectors were concerned that Class B1 uses as well as industrial and storage uses would be acceptable. The Department has clarified the range of uses that is generally acceptable on all employment sites and we have agreed with this general approach. As such Class B1 b) & c) uses are acceptable on the site.

The only remaining issue from the objections was therefore Class B1 a) – Offices. The objectors had sought some office use because of the park’s location next to Belfast City Airport and the flexible policy that had always applied to its development. The business park had operated for decades without any harm being caused to Belfast City Centre or local centres. The number of plots that would be suitable was limited due to the Control of Major Accident Hazard Regulations and it was only these plots that were sought for office use. The Department accepted the logic of this argument and agreed that these factors were sufficient to distinguish the site as a special case. They considered that a maximum overall amount of floorspace should be stipulated (5000 m² was suggested) rather than identifying specific plots within the business park. The objectors at the Inquiry accepted this compromise. We consider that this also addresses the remaining issue in respect of objection 3415. The Department made the point that this should be reflected in the overall quantum of offices allowed in the harbour area.

We agree with the parties approach to this issue and endorse the reasons given. The Department should bear this in mind in arriving at their final figure for offices in the harbour area. We consider that the Department should bear in mind the locational
advantages of the Airport surplus lands in considering the appropriate amount of office floorspace.

Part of objection 3415 was to the key site requirements for BHA08. There are no key site requirements for BHA08 and we therefore make no comment. It may have been a reference to zoning BHA01, which was considered above.

**Recommendation**

We recommend that zoning BHA08 refers to Class B1 (a), (b) or (c) of the Planning (Use Classes) Order (Northern Ireland) 2004) being acceptable. The total amount of floorspace for Use Class B1 (a) Offices shall not exceed 5000 sq. m. in total.

**Land at Old Channel Road**

(Objection 3128)

This objection relates to Lagan Holdings premises at Old Channel Road, which comprises an office building and storage yard. The objection is to the designation as existing employment and seeks a designation as whiteland. The objectors claim that the site makes no material contribution to employment in BHA08 and is suitable for a range of uses. Its location near Titanic Quarter and other offices make it well suited to office or residential uses, it is claimed. The Department’s response is that the site has been granted planning permission for Use Class B1 b) & c) use. The site is part of BHA as the A2 is the boundary at this location and it should be included in BHA08.

We consider that the site forms part of an area of employment uses and to exclude it from those uses as effectively an island of whiteland would be illogical. We do not consider that the location would lend itself to residential development because of the remaining employment uses and the adjoining main road.

**Recommendation**

We recommend that the designation of the objection site is not changed as a result of this objection.

**Land at Duncrue Road**

(Objection 2965/15)

Belfast City Council objected to the exclusion of two strips of land on the east side of Duncrue Road (adjacent to Water Service lands) from BHA08. The Department agreed that this land should be included. We see no reason to demur.

**Recommendation**

We recommend that this land is included in zoning BHA08.
TRANSPORTATION

Strategic Road Schemes

Objections to Strategic Road Scheme BHA 09 Sydenham Bypass and Non Strategic Road Scheme BHA 11 New junction on the A2
(Objections 702, 820, 831, 2015, 2760, 2913, 3861, 4238, 4245, 4257)

Concerns about widening the Sydenham Bypass related to both the principle of the scheme and the detail. The issue in respect of the principle was that added capacity on the road would undermine the shift to more sustainable forms of transport. The BMTP proposes a range of measures to deliver an integrated transport network; these include improvements to both public and private transport to meet long term needs. The other measures proposed on this part of the strategic road network include enhanced bus and train services between Belfast and Bangor, a Quality Bus Corridor along the Newtownards and Holywood Roads, a Park and Ride facility at Tillysburn and Rapid Transit proposal within the Harbour Estate. Whilst we accept that increased radial capacity could undermine public transport initiatives, we note the Department’s evidence that sections of the road operate at capacity at peak times and their view that even with significant modal shift, there will still be high demand on the network. Nonetheless, it is important that public transport initiatives are accorded high priority to maximise their potential, particularly in relation to commuter traffic. As part of the Regional Strategic Transportation Network, Sydenham Bypass has an important strategic role in relation to linking the Outer Ring Road with the motorway system, providing access to Belfast City Airport and the Harbour Estate and linking Bangor and Belfast. Viewed in the round, we consider that the scheme is a necessary part of the overall transportation strategy for this part of the metropolitan area. We do not accept that the scheme should not take place because of concerns that it would be beneficial to Belfast City Airport in view of the role of the airport as acknowledged in both the RDS and the Plan.

Belfast City Council had concerns about the impact of the proposal on Victoria Park in terms of greater separation from the community it serves and the effect on facilities within the Park. The Park is already severed from Sydenham by the A2 and the railway and is currently accessed by both pedestrians and vehicles via an underpass. While extension of the tunnel is undesirable, it would not be unacceptable if it was the only possible solution. We note that planning permission has been granted for a new footbridge and that the Department has agreed to look at alternative solutions which will be subject to public scrutiny as part of the overall scheme for access to the Harbour Estate and the Connsbank Link. Impact on facilities at the Park is inevitable but there would appear to be scope for their relocation elsewhere within the Park and any scheme should be designed to ensure minimum disruption. The Department indicated that the reference to ‘actual land take’ in Plan Amendment No 1 should be amended to read ‘land corridor protection requirement’ which will allow a degree of flexibility to address the objectors’ concerns. In view of the need for the scheme as concluded above, we do not consider that the effect on the Park’s facilities or access arrangements are sufficient justification for rejecting the proposal. We recommend no change to the Plan with the exception of the supporting text.
Concerns about proposal BHA 11 related primarily to the precise alignment of the new junction. We accept that relocation to Bridge End is not feasible and would not achieve the solution of providing a single junction to replace the current Dee Street junction if the Connsbank Link goes ahead. In any case, we can see benefits in taking traffic into the Harbour Estate in this general area rather than closer to the City Centre and a grade separated junction would allow the free flow of traffic along the Bypass. The objection from Titanic Quarter Ltd related to the detailed layout indicated on Plan Amendment No 1. At the Inquiry the Department confirmed that there was flexibility in the precise alignment of the junction, provided it met BMTP objectives and was compatible with the proposed Connsbank Link. It was suggested that the supporting text should be amended as agreed for BHA 09. The objector was satisfied that detailed discussion with the Department and Belfast City Council would address its concerns. There is no suggestion that funding for the junction would require financial contributions from developers who would not directly benefit from the new road alignment as feared by one objector.

We acknowledge the Council’s ongoing concerns about the effect on open space in the area. There is no doubt that the combination of the Connsbank Link, BHA 09 and BHA 11 will impact on both Victoria Park and George V Playing fields and some loss of facilities is inevitable. We consider, however, that the optimum location has been selected for these proposals and that it is a matter for the detailed design process to ensure that the various interests of the parties are accommodated to the greatest extent possible.

**Recommendation**

We recommend that the supporting text of Proposal BHA 09 and BHA 11 be amended to refer to the ‘land corridor protection required’

**Proposal BHA 10 M2 Widening**

(Objection 702)

We note, in the context of BHA 10, that the road improvements have now been completed.

**Rapid Transit Scheme**

**Proposal BHA 12 Rapid Transit Scheme Belfast Harbour (CITI Route)**

(Objections 587/2, 820/4, 831/11, 1803/1, 1928/2, 2015/19, 2965/16, 3568/11, 4225/2, 4235/1, 4238/6, 4242/1 & 4257/4)

The CITI Route is shown as running from the City Centre to George Best Belfast City Airport. The route is on-street from the City Centre to the Odyssey. The Plan originally showed the route through Titanic Quarter. However, this was changed to entry and exit points only being indicated in the Plan Amendment No. 1. The route then crosses the Musgrave Channel and Bombardier Aerospace factory, before running along the southern boundary of the airport to the terminal building.
Belfast City Council objected to the overall scheme on the basis that a network was required as part of an integrated transport system. Services need to be frequent and serve all locations in the area so as to achieve a shift away from cars and taxis. They suggested a personal transport system as proposed to serve Heathrow Airport terminals. This would be frequent and passengers could choose a variety of destinations on the same network. Developers were also likely to pay for a station to serve their proposal or development as part of this type of network, it was argued. We consider that there is merit in the argument that a network is required rather than a single route. This matter will be discussed further in subsequent paragraphs of our report. As we have indicated earlier the type of transport system to be employed is not before us. We cannot take any land use implications of additional routes into account in the absence of details of those routes. Links to individual proposals will be considered in the relevant sections of our report.

There was broad support for the scheme to serve Titanic Quarter. There had been some concern regarding the route specified in the Plan. The change to access and entry points resolved that issue and retains the flexibility necessary for the overall development. The detail of the CITH route will be addressed in the Titanic Quarter Masterplan. Harland and Wolff objected to the potential use of Hamilton Road as an East-West link within Titanic Quarter (as stated in the key site requirements for Zoning BHA01) because part of this road is within their operational area and any restrictions on their use of the area could prejudice the viability of the business. The reference to the use of this road for the CITH route was removed in the Plan Amendment and the objection is therefore related to Zoning BHA01 and will be considered in that section of our report. There were other concerns expressed regarding the location of the entry and exit points. We will return to this matter below after considering the remainder of the route.

All the objectors raised significant problems with the remainder of the route from Titanic Quarter to the city airport. Harland and Wolff and the Belfast Harbour Commissioners (supported by the Council and Invest NI) pointed out that the proposed swing bridge across the Musgrave Channel would seriously prejudice harbour operations. It would need to be open for such lengthy periods that it would not function as a route or it would prejudice traffic to and from Harland and Wolff. It was also noted that the full width of the channel is required for port traffic. The construction of a swing bridge that wide was an engineering impossibility. Bombardier Aerospace objected to the route on the basis that it would seriously prejudice their manufacturing operations. The route would run right through their site and buildings severing parts of the operation and requiring some demolitions. Their concerns were supported by Invest NI. Finally, George Best Belfast City Airport objected to the route because it would cut across the airport safety zone and compromise navigation and airport operations. The airport argued that the money would be better spent on improving the rail line which runs past the airport and providing a rail halt to serve the airport. Overall, there were significant concerns regarding the impact of the scheme on established businesses in the area and the lack of consultation on the proposals. The negative impacts on the employment potential and efficient operation of these major concerns would be contrary to planning policies at all levels, it was argued. In terms of solutions, many of the objectors identified that the problem was the provision of one route. There should be two routes: one to serve Titanic Quarter and another to serve the area around the airport.
We agree with the objectors that there are major problems with the CITI route from Titanic Quarter to the city airport as shown in the Plan. It appears ill-conceived and fraught with difficulties. It would prejudice the operations of three major employers in the area. Parts of the scheme appear to be severely prejudicial to port operations. The engineering difficulties with the proposed swing bridge appear to be insurmountable. In these circumstances we recommend that the Department deletes this portion of the route from the Plan. Indeed, we are aware that a recent feasibility study has determined that this portion of the route is not viable and should not proceed. Given that there is no exit from Titanic Quarter, we see no requirement for entry and exit points to be specified in the Plan. The route through Titanic Quarter can be left to the Masterplan.

**Recommendations**

We recommend:

- That the CITI route as shown from Titanic Quarter to George Best Belfast City Airport be deleted from the Plan.

- That the entry and exit points (Access Points) at Titanic Quarter shown on Plan Amendment No. 1 Map No. 3 – Belfast Harbour Area be deleted from the Plan.

**Proposal BHA 13 - New Railway Station, Tillysburn**

The RDS specifically supports a rail service to George Best Belfast City Airport. BMTP responds by indicating the long term possibility of a new station at Tillysburn to serve the airport. This is included in BMAP as BHA 13. Given this regional policy support, we see no basis for objecting to the provision of a station in principle. This would be to serve the airport as existing and any expansion of the airport would be a separate matter. We also reject the DRD argument that the economic case for a new station is weak because of low passenger numbers. This would apply to a new rail line to serve an airport. This is an existing line passing opposite the front of the terminal building, which is a totally different situation.

Objectors considered that there should be a railway station to serve the airport that was located close to the terminal building. This should have direct access to the terminal rather than relying on a bus service, as would be necessitated by the Department’s proposals. The Department’s reasons for rejecting the objectors’ location were basically twofold: the cost implications and that this location would be too close to the existing Sydenham station. The extra costs would arise because of the proximity of the A2 Sydenham by-pass to the rail line, which would necessitate the re-alignment of either the rail line or the road. Rail 21 disputed this claim and produced a plan to prove that there was sufficient space to accommodate a station without any re-alignment. They also stated that there was more width than at the existing Sydenham Station. Irrespective of the existing situation, we consider that even if there are additional costs associated with the objectors’ suggested site that they would be justified in this case. The cost savings of dropping the CITI route to the Airport and the benefits for airport users and sustainability of a station opposite the airport must be taken into account.
The point was also made that the Airport owners may be willing to contribute to the cost of providing a station. In view of the benefit to the Airport it would be reasonable to expect it to contribute to the cost of such provision.

DRD stated that the objection site would be too close to the existing Sydenham Station and Translink would oppose such a location for operational reasons. A further stop would also result in excessive delay, it was claimed. Rail 21 gave several examples of stations in closer proximity to each other (e.g. Botanic and City Hospital). It therefore appears that this would not be an insurmountable problem. There may also be options in relation to Sydenham Station that could be investigated. There was no information on how well-used it is or where passengers are coming from – i.e. whether a new City Airport Station would be just as convenient. We fail to see how there could be extra delays in re-locating the station. It would still be an additional stop on the line; wherever it was located. The timetable could be revised to address this issue and the frequency of services to the airport.

The Department advanced several other arguments in favour of their proposal. It was claimed that their site would serve Holywood Exchange. We consider that the retail offer at Holywood Exchange is such that people are unlikely to use a railway station to get there. Some of the units would be a considerable distance from the proposed station. This is part of a wider issue as stated by Belfast City Council. The Department also clarified that, surprisingly, the proposal was not related to a proposed park and ride site nearby. Overall, we consider that there was a blank refusal to consider other options that appeared to be driven by Translink’s intransigence and cost implications. The cost of providing a station only to serve Holywood Exchange would not be an effective use of public resources. It appears illogical to rule out the most obvious solution to an issue on such grounds.

We see considerable force in the argument that there is already a rail line running past the airport and that its potential should be investigated and exploited. We are unconvinced by the Department’s arguments, particularly in the context of the difficulties with providing a rapid transit system to the serve the airport. The issue of the location of a station to serve the airport should be re-examined. We agree that the objectors’ suggested location has considerable merit. There is time for this work to be undertaken, as we were informed that the proposal is programmed for commencement outside the Plan period.

**Recommendation**

We recommend that Proposal BHA 13 be deleted from the Plan and the proposed location of the railway station to serve George Best Belfast City Airport be re-considered.
NATURAL ENVIRONMENT AND OPEN SPACE

The RDS at Chapter 12 and SPG-ENV 1 sets out a series of measures to guide developers and the whole community to conserve the natural environment. This includes inter alia the designation of SLNCIs and LLPAs. The aim of SPG-ENV 2 is to conserve and manage the coastline of Northern Ireland. There is obviously a balance to be struck between the aims of chapter 10 on Supporting Economic Development and those of chapter 12. As stated above, the importance of BHA is recognised in the RDS in terms of enhancing the role of Belfast. The port of Belfast and the City Airport are regional gateways and the key urban regeneration role of the riverside renewal and Titanic Quarter is emphasised (BMA 1.1). The economic development, employment and tourism potential of the area is stressed (BMA 2.1 and ECON 3.1).

Objections to Designations BHA 15/01 - Belfast Harbour Estate & BHA 15/03 - Tillysburn SLNCIs and Proposal BHA 17 Tillysburn LLPA
(Objections 2015/34 & 36 and 3568/24 & 26)

SLNCI BHA 15/01 relates to an area of land to the NE of the city airport beyond the end of the runway. LLPA BHA17 relates to a similar area, but includes a further strip of land to the south along the A2. The Plan states that the feature of interest in this LLPA is the fact that it is an area of local conservation interest. This ties the issues together for both plan proposals and the objections to both and so we shall consider them on that basis.

The objection was solely concerned with the effect of the proposed designation on the risk of bird strike (collisions between birds and aircraft). Reference was made to a Civil Aviation Authority (CAA) publication – CAP 772 “Bird strike Risk Management for Aerodromes”, by the CAA Safety Regulation Group. It was claimed that this document was binding on local planning authorities. Having considered the document and its contents, we are of the opinion that it constitutes guidance for aerodrome operators on how to minimise the risk of bird strike by habitat management and bird-scaring. Paragraph 4.3 makes it clear the neither the CAA nor aerodrome operators have a specific power to override a planning decision. Paragraph 4.11 refers to nature reserves and says that many do not have the potential to increase the risk of bird strike. The advice is that aerodrome operators liaise closely with those responsible for managing such sites. Whilst the objector referred to paragraphs 3 and 4 of the introduction to argue that the Department was an appropriate authority for the purposes of CAP 772, we consider that paragraph 5 describes the purpose of the document which is to provide guidance for aerodrome operators in order to comply with the CAA licensing requirements.

The objection claimed that the proposed designation was unnecessary given that nature conservation interests were well served by the international designations on nearby lands. The proposed SLNCI would constitute a hazard for aircraft it was claimed. The Department countered that the proposed designation would make no difference to the issue of bird strike. The land exists and would remain whatever happens. The real issue is one of management to avoid the problem arising. The area is managed by the RSPB, who are aware of the need to prevent birds frequenting this
location. We agree with this assessment and do not consider that there is anything in CAP 772 or the objectors’ evidence that convincingly refutes this point. The issue is one of management of the land, which the responsible body seems to have in hand. There was little evidence that the site was not a worthy candidate to be a SLNCI because it lacked sufficient nature conservation interest. The argument that there are enough protected sites in the vicinity is not a justification for not designating these lands as a SLNCI. In these circumstances we cannot sustain the objection. There was an objection to the LLPA on a similar basis and for the same reasons we cannot sustain this objection either.

The other objection to these designations was concerned with the nature of policies ENV2 and ENV3. The concern was that as drafted these policies would impose onerous restrictions on the harbour estate. This would be contrary to its important role as set out in the RDS. We have considered these policies in Part 1 of this report and have concluded that they should be re-worded, which may address the objectors’ concerns. If there is any conflict between these designations and development in BHA then they will have to be assessed on an individual basis. This potential for conflict in itself is not a basis for removing the proposed designations.

There was a remaining objection to the inclusion of Airport Road west in both designations. This is a critical access road for the harbour estate and its inclusion was argued to be patently absurd. The Department conceded that Airport Road West should be excluded from the SLNCI. We agree with this assessment. The SLNCI is a smaller area and this does appear to have less significance for nature conservation. We note that the adjoining land to the north is within an ASSI. The Department argued that this road should remain within the proposed LLPA. This was because there were important belts of planting along the road that made a valuable contribution to the LLPA. Again we agree with this assessment in the absence of a convincing counter-argument from the objectors. However, there were objections to the entirety of the LLPA and we note that it appears to include Clare House, a stretch of road to the west with no associated planting and a car park associated with the B & Q store. Whilst we support the designation in principle we advise the Department to re-consider the LLPA boundary in relation to those features.

BHC lodged an objection to Designation BHA15/03 Tillysburn SLNCI. This objection was not supported with any evidence and so we assume that it has been addressed.

**Recommendations**

We recommend that:

- Designation BHA 15/01 - Belfast Harbour Estate SLNCI be confirmed and its boundary be amended to remove Airport Road West from the designation.

- Proposal BHA 17 - Tillysburn LLPA be confirmed. The Department is advised to re-consider its boundary definition as detailed above.

- Designation BHA 15/03 - Tillysburn SLNCI be confirmed.
Objection to Proposal BHA 16 North Foreshore LLPA

Objection 2015/35
This objection by BHC was to the extent of the designation. The concern was that the LLPA extended to the boundary of the M2/M5 and the slip roads to the Fortwilliam roundabout. It was argued that this could prejudice future improvements to the main arterial route to the port. An LLPA designation does not preclude development. The M2 widening works have been completed with minimal disturbance to the areas of planting. Any further improvements to the junction would be assessed on their individual merits bearing in mind the importance of the BHA to economic development. The landscaping along the boundary of Zoning BHA07 may well be retained as part of the requirements of the zoning. This does not mean that it should not be designated as part of a LLPA as well. There is no guidance to avoid designating LLPAs on publicly-owned land. We agree that this LLPA includes landscape features that are worthy of protection that are located at a main entry point to Belfast. The LLPA also contains a SLNCI, which is another criterion for designations in paragraph 2.23 of PPS6. There was an objection to this SLNCI from BHC, but this objection was not supported with any evidence and so we cannot assess it further. We therefore recommend no change to the proposal as a result of this objection.

Objection 3759
Objection 3759 sought the identification of land between the railway line and the M2 as a DOS to include public open space. The objector indicated that the site was part of lands that were affected by a planning application (reference Z/2003/2548/O) for a mixed retail, residential, and recreational development.

We cannot accept that this site could be described as vacant or underutilised land in terms of the role of DOSs as an urban regeneration tool. Neither do we accept that a DOS should be designated for end use as public open space.

The site comprises the proposed BHA16 LLPA and contains part of the proposed BHA 15/02 SLNCI. The objection did not dispute these designations. Whilst there would be no impediment, in principle, to its use as a public park, we have concerns in respect of access to the site, given that it is sandwiched between the railway line and the M2 motorway. Unless a firm proposal from BCC is forthcoming or approved (including provision of access to the land) before the Plan is adopted we do not consider that the site should be identified as open space. On the basis of the current circumstances, we recommend no change to the Plan.

Objection to Proposal BHA 18 Victoria/King George LLPA
(Objection 2015/37)

The objection focussed on the incompatibility of the proposal with Proposal BHA11 – New Junction on the A2. The importance of this road proposal for Titanic Quarter was recognised. The concern was that the designation of a LLPA could prejudice the road scheme. The Department initially stated that the LLPA would not preclude development and any proposal would have to respect the landscape character of the area. However,
the objectors confirmed that exclusion of the land required for the road scheme from the LLPA would overcome the objection. The Department agreed to revise the LLPA boundaries to exclude this land. We endorse this compromise.

**Recommendation**

We recommend that the boundary of proposal BHA18 be amended to exclude the lands associated with Proposal BHA11 – New Junction on the A2 as shown on Plan Amendment No. 1 Clarification Map No. 27.

**Objections to Designation BT102/18 – Inverary SLNCI, Designation BT113 – Blanchflower/Patton LLPA, Designation BT162/07 Community Greenway – Odyssey/Stormont and Identification of Site as Open Space**

(Objections 1927, 2965/56, 2965/57 & 3568/20)

BT113 comprises all the playing fields and parks between Holywood Road and the A2 Sydenham By-Pass. BT102/18 is within this area and consists of land adjacent to Tommy Patton Millennium Park. The important characteristics of the SLNCI are described as areas of species rich grassland with large numbers of orchids and recently planted native broadleaf trees. The description of the features of the LLPA includes the SLNCI (mature trees) and that the area of pitches and parkland provides an important landscape setting. There were several issues raised in relation to these designations.

Objection 1927 comprised all of BT113 and sought the removal of these two designations from the land and its zoning as a mixed-use employment site. The original objection only sought that the site be zoned as whiteland and not for employment purposes and therefore this element cannot be considered further. The basis of the objection was that the land could be developed in order to fund Bombardier’s operations at Queen’s Island. A mixed use scheme could enhance the recreation value of the open space and improve the facilities. Extensive information was provided of the economic development importance of Bombardier. Anything that could fetter their economic potential would be completely unacceptable. They also again argued that there was no requirement for the SLNCI designation as the nature conservation needs of the harbour area were already well served. Belfast City Council objected on the basis that the site was being considered for intensive recreational development proposals such as a velodrome. They sought the exclusion of specified areas of pitches and actively managed open space from the designations. The designations should focus on the areas of particular interest i.e. the trees and planting in the area. This could also be addressed by a TPO.

We recognise that the site is in a highly accessible location and the importance of supporting economic development in regional planning policy. However, this cannot mean that all available portions of land next to main transport corridors must be zoned for development. The site forms part of a well-established area of open space and recreation facilities. The boundaries and some portions of land in between have established trees and planting. The criteria for the designation of LLPAs include locally important landscape features and nature conservation interests, both of which are present here. The area is an important landscape element consisting of amenity open
space between large areas of housing, major transport routes and the airport/port. The area is of amenity value and of local significance and meets the criteria for designation. We do not agree that the use of tree preservation orders would be an adequate substitute for the proposed LLPA designation. It is the overall area that is the important landscape or townscape feature, not just the boundaries and areas of trees. For this reason we do not agree that parcels of land in the midst of the area should be excluded or that parts of the site do not warrant designation. The potential economic development or recreational benefits of Bombardier’s possible proposal for the site do not outweigh the case for designation of the lands, in our opinion.

Designation as an LLPA does not preclude any development on the site. However, the lands clearly comprise an area of existing open space within the definitions in PPS8. The Plan is required to identify areas of existing open space by PPS8 for information only. The objection that the Plan has merely identified the land without any proper assessment of the quality of the privately-owned facilities is therefore without basis. We have recommended earlier that plan Policy OS1 be deleted from the Plan and so there can be no basis for that part of the objection. Any development proposal would involve the loss of existing open space, which could be contrary to regional policy in PPS8. This is another potential obstacle to the objectors’ plans for the site. We consider that the identification of the land as existing open space is justified.

A great deal was made of the fact that the Department were prepared to sacrifice an area of woodland adjoining the LLPA to a park and ride proposal (BT15/01). There are obviously always competing interests in development plan proposals. It is for the Department to weigh competing issues in arriving at its considered view of the optimum solution in the public interest. In the case of the Tillysburn P&R we disagree with the Department’s assessment and we conclude elsewhere in the report that the proposal be deleted from the Plan.

This land is remote from Bombardier’s operations in the harbour estate and as such it is highly speculative to suggest that it could form part of the company’s manufacturing facilities. The land in Bombardier’s ownership is not within the SLNCI. There was no evidence that the nature conservation interest of the site was not sufficient to merit the designation. The evidence referred to species rich grassland, which is the area that the Council wanted excluded. We do not agree that it should be excluded just because the Council may have plans for the area.

Belfast City Airport raised an objection to the SLNCI on the same basis as their objection to BHA15 above i.e. that the designation would lead to an increased risk of bird strike. We have addressed this issue above and reach the same conclusions here.

The objection to the community greenway related principally to the policy context provided by Policy OS2 being unduly restrictive. Our conclusions in Part 1 of this report should allay those concerns. The Department confirmed that the route shown on Plan 4/002 was schematic only and were willing to add this to the amplification. We recommended earlier that accurate details of the routes of the designated Community Greenways should be provided. This does not accord with the Department’s answer to the Inquiry. We consider that the route should be accurately plotted on the Plan maps as per our recommendation on Policy OS2. Objectors should note our other recommendation for Policy OS2 that makes it clear that development proposals
involving amendments to the identified routes will be acceptable provided that the alternative arrangements maintain the overall integrity of the route and meet the designation’s layout criteria.

**Recommendation**

We recommend that:

- Designations BT 102/18 Inverary SLNCl and BT 113 Blanchflower/Patton LLPA be confirmed.

- The route of Designation BT162/07 Community Greenway Odyssey/Stormont as indicated on Map No. 4/0002 be accurately plotted on the Plan Documents.
ARTERIAL ROUTES

General Objections to Arterial Routes Strategy and Policies AR 01 - AR 05
(Objections 661, 1225, 1469, 1494, 1648, 1927, 2760, 2791, 2913, 2965, 2970, 2974, 3003, 3558, 3651)

The Plan designates 18 Arterial Routes under AR 01, 15 Commercial Nodes and Areas of Parking Restraint under AR 03 and 15 Shopping/Commercial Areas under AR 05. Arterial Routes are the subject of a number of strategic policies in Volume 1 of the Plan. General objections seeking more extensive boundaries in relation to designations AR 03 and AR 05 have been addressed in response to objections to SETT 4 in Part 1 of our report. Concerns about Areas of Parking Restraint have been covered in relation to TRAN 4 and the requirements of particular retailers have been addressed under R6. Acceptable levels of retailing and office use are considered under OF 2, OF 3 and R6. It is unnecessary to address those issues again. Before turning to objections in respect of specific Arterial Routes, we turn to general objections in respect of the strategy, designations and policies.

Objection 3003 expressed a general concern that essential retail uses should not be eroded on Arterial Routes by such uses as hot food bars and other commercial uses. Strategic policy recognises the importance of Arterial Routes as the focus for local community and commercial life and we consider that a range of land uses could be required to meet local needs. Policy R6 is aimed at accommodating an appropriate level of retailing, particularly convenience retailing, to meet such needs within commercial nodes and shopping/commercial areas in order to maintain and enhance identifiable local centres of commerce. Policies OF 2 and OF 4 also allow for small scale office provision. Notwithstanding the importance of local retailing, however, we consider that other land uses that serve local communities should not be ruled out and their acceptability will be determined through the development management process. We recommend no change to the Plan as a result of this objection.

Some objectors were concerned that the identification of Commercial Nodes as Areas of Parking Restraint (APR) would make them less attractive to developers. The Nodes represent only a limited part of the Arterial Routes overall and we note the Department’s reasoning that Nodes are located at key route connections where public transport is available. Nonetheless, we appreciate that these areas provide a range of facilities to local communities and are accessible by car. We were presented with no evidence to suggest that there is a shortage of short term parking to serve these areas. We have addressed parking standards in APR in Part 1 of our report and concluded that there is sufficient flexibility to allow for variations where it can be demonstrated that parking shortages could impact on the vitality, viability and competitiveness of town and city centres. We consider that this would also be the case at Commercial Nodes on Arterial Routes where it could be demonstrated that regeneration initiatives were undermined by the APR. We consider that Commercial Nodes should be confirmed as APR.

The focus of the remaining objections related to the design requirements contained in policies AR 02 and AR 04. Policy AR 02 contains three general requirements that will apply to all Arterial Routes. These have emerged from the Urban Design Study which is
a Technical Supplement to the Plan. In general, the Study found poor physical and visual condition along Arterial Routes, extensive road blight, discontinuous road frontage with many gap sites and inappropriate redevelopment along street frontages. The Department indicated that the response is intended to provide broad parameters aimed at reinforcing character and sense of place which will assist in delivering the key components of the Plan Strategy aimed at supporting economic development, promoting urban renewal and enhancing quality of life. We disagree that the parameters are very broad – they apply very broadly in that they apply across the entirety of designations but they are precise in their requirements. Building to the prevailing building line is a normal planning principle and one that is capable of being addressed through the development management process. The suggested amendment to allow for the “appropriate” building line is meaningless and we do not support it. Parking is often found to the front of buildings, particularly dwellings, along Arterial Routes and the requirement to locate parking to the rear of new buildings may not necessarily reflect the traditional street pattern along the more suburban sections of the Routes. We agree that it is undesirable for new developments to be set back from the street frontage in order to accommodate extensive parking areas or for front garden areas to be given over to parking but these are also matters within the remit of the normal development management process. We agree that these requirements are overly prescriptive.

The presumption against large single block development is an issue to be judged in the context of the surroundings of particular Arterial Routes. The point has been made that the requirements fail to acknowledge the diversity in historic built form along many of these routes and that there is a danger that such prescription will lead to a sterile uniformity. Whilst we acknowledge the inappropriate nature of some large single block developments, the requirement for development to be fine grain in nature throughout all Arterial Routes appears to us to be unduly restrictive and unresponsive to local circumstances.

The Urban Design Study provides a broad analysis of each of the Routes and sets out the typical character of each, including building heights. These corridors radiate out from the City Centre and extend to up to 6 km in length and there is considerable variety in built form along them. The development management process imposes a general requirement for development proposals to be responsive to their surroundings and the requirement for building height and massing to be appropriate to the scale of the street is therefore redundant. The requirement for building heights to be generally 2-3 storeys ignores the wide variety in streetscape and building scales found along the Arterial Routes and is unduly restrictive.

We have endorsed SETT 4 which aims to promote good quality design along Arterial Routes and we do not consider that Policy AR 02 provides an adequate design response to deliver the quality required. The objective of promoting regeneration along these routes has been given insufficient consideration and we share the concerns raised by some objectors that the policy fails to grasp the commercial reality of the challenge and may deter rather than encourage investment. More intensive development is currently restricted to commercial nodes but there may be opportunities elsewhere along the routes where more intensive forms of development would support regeneration, provided land use policies are met. There will also be locations where the design concerns are not critical. The analysis already undertaken in the Urban Design Study provides a sound basis from which to develop design parameters that are more
closely tailored to the areas concerned and recognises the variety of townscape contained within the different Arterial Routes and between different parts of the City. We recommend that a more responsive approach is adopted in the form of supplementary guidance to developers and that the policy is deleted. In view of this conclusion, we do not favour the Department’s suggested amendment to the policy wording which was tabled at the Inquiry.

Policy AR 04 introduces a requirement for minimum and maximum building heights at Commercial Nodes. The minimum is presumably aimed at making efficient use of urban land and the maximum is intended to allow a greater scale in terms of building height than is generally found at these locations in recognition of their role. We note that these requirements flow from more detailed analysis in the Urban Design Study and to that extent we accept that the requirements are responsive to their surroundings and to the need to promote regeneration. There is no reason to conclude that by specifying height, good design will be inhibited. It is also erroneous to suggest, as the Department has done, that specifying building heights will promote good design. Taken in combination with the supplementary guidance we have recommended above, however, we consider that a design-led approach that is responsive to the individual Commercial Nodes can be achieved. We note the views of one objector who was concerned that the imposition of minimum heights fails to acknowledge the operational requirements of petrol filling stations. As we have stated previously, it is open to individuals to argue an exceptional case in the context of a planning application. In view of our conclusion that Policy AR 02 should be deleted, further consideration of amalgamating AR 02 and AR 04 and amending the wording of the combined policy is not required.

**Recommendations**

We recommend that:

- Policy AR 02 is deleted from the Plan and supplementary design guidance is provided for the Arterial Routes;
- Commercial Nodes are confirmed as Areas of Parking Restraint;
- Policy AR 04 is confirmed; and
- Designations AR 01, AR 03 and AR 05 are confirmed except as provided for in relation to individual objections considered below.

**OBJECTIONS TO ARTERIAL ROUTE DESIGNATIONS**

**AR 01/01 - York Street/York Road/Shore Road**

(Objection 2965/9)

The objections by BCC stated that there were no Commercial Nodes or District Centres identified beyond the Limestone Road and that no existing commercial areas have been identified beyond Fortwilliam interchange where the Arterial Route is inexplicably truncated. The objector did not forward any specific areas for consideration as Commercial Nodes and did not highlight any of the existing commercial areas that should be designated. No arguments to its extension beyond the Fortwilliam
interchange were advanced. Given the general nature of this objection we are unable to make any recommendations. Accordingly, we recommend no change to the Plan.

**AR 01/09 - Donegall Road**
*(Objection 2965/10)*

This objection by BCC was that no Commercial Nodes were identified for the Donegall Road and only limited Shopping/Commercial Areas are shown within the village area. The Council did not provide any details of the areas that it considered should be designated. We are therefore unable to consider this objection any further. We endorse the view of the Department that the Park Centre District Centre on the Donegall Road to the west of the Westlink recognises the retailing and commercial function of this part of the road. Given the general nature of this objection we are unable to make any recommendations. Accordingly, we recommend no change to the Plan.

**AR 01/10 Lisburn Road**
*(Objections 661/2 and 3, 3558/11)*

While the objector sought an extension of the AR to Finaghy Cross this did not form part of the original objection and we cannot consider the matter further. We agree with the Department that the change in character beyond the Balmoral junction does not justify extending the AR as far as the objection site. Accordingly we do not agree that the AR should be extended to include Nos. 2 & 4 Upper Lisburn Road. As a result there can be no justification for the designation of a Shopping/Commercial Area on this site. Accordingly we recommend no change to the Plan.

**Objection 2880**

This was an objection to the Plan graphics in which there was a lack of clarity between ATC and Commercial Node designations as both use blue boundary lines. The objection was unfounded, given that there are no Commercial Node designations along this AR. Looking at other ARs, the Commercial Nodes are defined with a dark blue line and the ATC designations are cross hatched within lighter blue boundary lines. Although the graphics are fairly similar, we consider that the ATC designations are distinguishable due to hatching and tone. Accordingly, we recommend no change to the Plan.

**AR 01/12 - Ormeau Road**
*(Objection 427/4)*

The objection was to the exclusion of Cromac Street from the Ormeau Road AR and sought its extension towards the City Centre to Cromac Square. It stated that Cromac Street used to be a vibrant thoroughfare and has been allowed to die. However Cromac Square and Cromac Street both lie within the City Centre. The Plan designates the ARs as the main radial roads which connect Belfast City Centre to the surrounding suburban residential areas and function as main transport corridors into and out of the City Centre. Given this, it is inappropriate to extend the AR into Cromac Square. In any case, the City Centre designations and policies apply to Cromac Street and Square and
are aimed at promoting the vitality and viability of the area. Accordingly, we recommend no change to the Plan.

**OBJECTIONS TO THE FAILURE TO DESIGNATE ARTERIAL ROUTES**

**Malone Road/University Road**  
(Objection 1391/2)

This objection sought the designation of University Road / Malone Road as an Arterial Route with Shopping/Commercial Areas. We note that this is already an Arterial route - AR 01/11, but there are no associated Shopping/Commercial Areas. The objection did not put forward any specific sites for our consideration and we are therefore unable to consider the matter further. We recommend no change to the Plan.

**Sandy Row and Donegall Pass**  
(Objections 2965/99 & 100, 666/3)

BCC stated that for clarity and guidance as to future development potential within the City Centre, roads that have the characteristics of Arterial Routes such as Sandy Row and Donegall Pass should be treated similarly. Sandy Row and Donegal Pass are wholly within the City Centre Boundary and City Centre designations and policies will apply. It would be inappropriate to designate these as Arterial Routes. Even if they were subject to AR policies it would not provide the framework for the regeneration of these areas and the surrounding communities that the objectors sought. We recommend no change to the Plan.

**Ligoniel Road and Stranmillis Road**  
(Objections 2855/10 & 2913/3)

The Ligoniel Improvement Association sought designation of an AR on Ligoniel Road. Given that this road has no direct connection to the City Centre, it does not meet the criteria for designation and we cannot therefore support the objection. For the same reason we cannot support the designation of Stranmillis Road as an AR. We recommend no change to the Plan.
OBJECTIONS RELATING TO COMMERCIAL NODES AND AREAS OF PARKING RESTRAINT ON ARTERIAL ROUTES

AR 03/03 - Antrim Road/Crumlin Road Junction (Carlisle Circus)  
(Objection 2965/7)

This objector stated that the Node includes a large residential home, which appears inconsistent with the designation, and excludes a number of existing commercial properties and a development site.

We note that Technical Supplement 6 states that AR Nodes form points of local activity along the Arterial Routes, however it makes no reference to land uses. We endorse the Department’s concession that the large residential home is clearly not a commercial use that contributes to the function of the Commercial Node and therefore should be removed. The existing commercial properties and development site referred to in the objection, which were excluded from the Commercial Node, were not identified and therefore we are unable to make any recommendations in relation to that element of the objection.

Recommendation

We recommend that the Clifton Residential home is removed from this Commercial Node designation.

AR 03/04 - Crumlin Road/Oldpark Road/Agnes Street Junction  
(Objections 1738/15 and 3563/15)

This objection stated that the Crumlin Road frontage between Snugville Street and Silvio Street has been designated as a Shopping/Commercial Area and that this site and the land behind it, which have planning permission for residential development, should be included in the designation. We note that the objection site is on the opposite side of the road from the AR03/04 designation and clearly does not physically form part of it. Accordingly, we recommend no change to the Plan.

AR 03/09 - Falls Road/Glen Road Junction  
(Objection 2965/8)

The objection stated that the Node at the Falls Road/Glen Road junction does not reflect existing activity or the potential for a commercial area other than through the potential redevelopment of the site between the junctions of the two roads. We endorse the Department’s view that, notwithstanding a few small commercial properties, the large undeveloped site of the former Andersonstown PSNI station, the workshop of the Translink depot, and the pedestrian footway do not reflect the uses of a Commercial Node. We consider that the row of commercial properties, of itself, is not of a sufficient scale to justify a Commercial Node designation. We agree with the Department that designation AR 03/09 should be deleted.
Recommendation

We recommend that Designation 03/09 - Falls Road/Glen Road Junction Commercial Node should be deleted from the plan.

AR 03/15 - Upper Newtownards Road/Sandown Road Junction (Ballyhackamore)
(Objection 2965/6)

The objection stated that the designation does not reflect the level of commercial activity on the road and should be expanded. However no areas were identified for inclusion within the designation and we are thus unable to consider the matter further.

Objection to the failure to Designate Commercial Nodes on AR 01/11- University Road/Malone Road
(Objection 1648)

This objection related to the failure of the Plan to designate a Commercial Node on the Malone Road AR from the Wellington Park junction to the Eglantine junction as the essential elements of a Commercial Node exist. It stated that the Node merits recognition and strengthening to service the local community.

Almost half of the objection site is the Wellington Park Hotel complex and it includes some pubs, takeaways, restaurants, shops and offices. Most of the objection site with the exception of the Wellington Park Hotel Complex is already within the Queens Office Area. We do not consider that the scale and range of uses would justify designation as a Commercial Node. Accordingly, we recommend no change to the Plan.

General objections to the failure to designate Commercial Nodes on the Lower Ormeau Road, Lower Ravenhill Road, Donegall Road, Lisburn Road and Andersonstown Road
(Objections 2965/93-97)

The objections raised concerns that there were no Commercial Nodes designated along any of the above ARs despite the presence of significant commercial areas along them. This general objection did not identify any specific areas for our consideration and therefore we are unable to make any recommendations.

OBJECTIONS RELATING TO SHOPPING/COMMERCIAL AREAS ON ARTERIAL ROUTES

AR 05/03 - Antrim Road

Objection 2760/65

The objection sought the removal of the objection site from the designated Shopping/Commercial Area on the Antrim Road AR. The objector argued that if Plan
policy R6 is not amended, and the Tesco store is kept within the Shopping/Commercial Area, its enhancement will not be permitted beyond 500 m², whereas shops outside such the zoning will not have to comply but will be subject to regional policy. We have already endorsed the 500 m² gross floorspace restriction for convenience shopping in Policy R6.

We consider that the Tesco store on the objection site provides for local convenience shopping on an Arterial Route and it is therefore appropriate to include it. Shopping/Commercial Areas identified along ARs include properties in existing retail use and provide the local community with locally accessible goods and services. It would be illogical to exclude such a retail use from this designation and be contrary to the objectives of strategic policy. Accordingly, we recommend no change to the Plan.

Objection 2695/079

The objection pointed to the inconsistency where the Antrim Road AR stops at Salisbury Avenue although Shopping/Commercial Area designations continue along the road. This does seem at odds with Designation AR05 as it refers to Shopping/Commercial Area designations on Arterial Routes. We note that this situation does not arise with any of the other ARs. We endorse the Department’s view that the Shopping/Commercial Areas, beyond the AR should be deleted.

The objection also argued that the identification of Shopping/Commercial Areas does not fully reflect the levels of commercial activity along the road; however, no areas were identified for our consideration and therefore we are unable to make any recommendations.

Recommendation

We recommend that the designated Shopping/Commercial Areas beyond the Arterial Route are deleted from the Plan.

AR 05/09 - Grosvenor Road/Springfield Road.
(Objection 1686/2)

The objector sought that the Shopping/Commercial Area identified on the Springfield Road should be extended to include the objection site This extensive objection site is approx 8 or 9 times larger than the actual designation in the Plan, which has been incorrectly identified by the objector. Shopping/Commercial Areas along Arterial Routes mainly include properties which are in existing retail and office use, which provide the local community with locally accessible goods and services, and also tend to be small in scale. To include such an extensive objection site within the Shopping/Commercial Area would be contrary to the objectives of strategic policy. Accordingly, we recommend no change to the Plan.
Objection to the non designation of specified land as a Shopping/Commercial Area at No. 318 Ravenhill Road  
(Objection 3558/12)

This objection stated that the subject site should be designated as it is an important local centre for convenience retailing. We endorse the Departments view that, given the current use on the objection site, it should be designated as a Shopping/Commercial Area.

Recommendation

We recommend that lands at No. 318 Ravenhill Road, as identified on the map accompanying objection 3558, are designated as a Shopping/Commercial Area on the Ravenhill Road Arterial Route.

Objection to the non designation of specified land as a Shopping/Commercial Area at Nos. 70 -74 Malone Road  
(Objection 3558/8)

The objection raised concerns that no Shopping/Commercial Area designations exist on the Malone Road. This objection referred to the existing shopping and commercial uses at Nos. 70-74 Malone Road and argued that the site is an important local centre for convenience retailing. We endorse the Department’s view that the current uses on the site justify its designation as a Shopping/Commercial Area.

Recommendation

We recommend that lands identified at Nos. 70-74 Malone Road on objection 3558 – map 4 are designated as a Shopping/Commercial Area on the University Road/Malone Road Arterial Route.

Objection seeking the inclusion of land within Shopping/Commercial Area AR 05/10 – Holywood Road  
(Objection 3558/9)

The objection sought the inclusion of lands to the rear of Nos. 220-230 Holywood Road within AR 05/10. Shopping/Commercial Areas are identified along Arterial Routes and mainly include properties which are in existing retail and office use and which provide the community with locally accessible goods and services. We agree with the Department that as the objection site does not front on to the AR, and that it is not in retail or office use, that it would be inappropriate to include it within the designated Shopping/Commercial Area. Accordingly, we recommend no change to the Plan.
Objection seeking the inclusion of land within Shopping/Commercial Area AR 05/11 - Lisburn Road
(Objection 3683/1)

This objection sought the inclusion of the Maxol Station within the Shopping/Commercial Area. We endorse the Department’s view that, given the planning permission granted on this site for a mixed use development including office and retail use, the objection should succeed.

Recommendation

We recommend the inclusion of the objection site within the AR 05/11 Shopping/Commercial Area on the Lisburn Road AR.
OUTER BELFAST CITY

OBJECTIONS TO THE SETTLEMENT LIMIT

NORTH BELFAST

Objection to Exclusion of Wolfhill Quarry from Settlement Limit (also to proposed AOHSV and AOCMD)
(Objection 2172)

The original objection sought inclusion of Wolfhill Quarry within the settlement limit. This was not referred to in the subsequent submission, which argued that the Plan should recognise the existence of the long-established quarry at Wolfhill as an existing industry and employment site that should be safeguarded by identification as such in BMAP. It was posited that this would be consistent with the RDS and PPS4. The objection was also to the identification of part of the site as AOHSV and AOCMD.

It would be illogical to include the site within the settlement limit as it is remote from the urban area. We recognise that PPS4 advises that Plans are intended to provide certainty about the type of development permitted at various locations, and that land uses such as industry will be zoned for. We note the objector’s recognition of the statement in PPS4 thatzonings will not normally be made for industrial development in the countryside, outside development limits. We accept that there could be exceptional circumstances where industrial development beyond the urban area may be zoned and we recognise that BMAP has identified some existing employment zonings outside settlement limits. Notwithstanding this, it is our opinion that it would be illogical to attempt to zone every site in the countryside that contributes to the economy’s employment base, particularly given the large number of rural businesses. Provided that such businesses are not unauthorised, there would be no impediment to their continued operation. In the case of quarries, policy recognises that these are rural phenomena and makes provision for their existence. We do not consider that the Plan should identify the subject quarry as an existing employment/industry zoning. With regard to the objector’s argument that the Plan should adopt a “positive mineral Policy”, we have commented on this matter in part 1 of our report.

With regard to the proposed designations affecting the site, we have concluded that the Department should re-examine its position in respect of identifying the extent of AOCMDs. The objector’s argument that the site should be excluded from an area of constraint can thus be considered in due course. With regard to the proposed AOHSV designation, the site is on the periphery of same and only a small area in the north-eastern corner, containing a dwelling with outbuildings and some rough grassland, actually lies within it. It is a large designation and we note that the outer (western) boundary appears to have been drawn to follow features such as streams, laneways and field boundaries, rather than topography alone. On the ground, we cannot ascertain any particular features to distinguish the small portion of the site that lies within the AOHSV, from the land to the west that does not. We do not consider that deletion of the designation from the site would impact on the function of this extensive AOHSV and recommend accordingly.
**Recommendation**

We recommend that the AOHSV designation be removed from the objection site.

**Objection to inclusion of lands at various locations within the settlement limit**  
(Objection 3614/1)

The objection raised concerns in respect of possible development incursions in the following areas: (i) Above the ‘Horseshoe Bend’, (ii) on the remnant farmland above the top of the Old Cavehill Road, and, (iii) beyond the present building line in Glengormley/ Hightown, on the fringes of Collinward Mountain and along the Upper Hightown Road. Whilst we were not provided with plans to show the locations of the lands referred to, it would appear that the sites are located outside the proposed SDL. The Plan does not therefore propose development in these areas and we need not comment further.

Concern was also raised that the settlement limit in North Belfast was drawn along the edge of the basalt escarpment in the Cavehill Country Park, rather than to reflect the edge of the built-up area as it is elsewhere in Belfast - it was feared that this may result in development within the grounds of Belfast Castle.

We note that the SDL appears to have been drawn to include various areas of parkland, including a portion of Cavehill Country Park, the grounds of Belfast Castle, Belfast Zoo, and some other largely undeveloped lands. The majority of these areas are affected by the following designations: ULW (BT98), AOHSV, HPGD (BT082 and BT083), SLNCI (BT102/12) and LLPA (BT108); they are also identified as existing open space. The Department has not provided a rebuttal to the objection and we are unsure as to why some of these lands are included within the urban area. As indicated on page 133 of the Belfast District Proposals, it may be because the lands were identified as urban in the BUAP, albeit with a reservation for landscape, amenity or recreational use. It is clear that the Department has deemed it necessary to protect these areas from most types of development, through the proposed designations.

For obvious reasons we see logic in the Zoo remaining within the SDL; it contains a mix of buildings and uses that are urban in character. However, there would not appear to be any good reason why Belfast Castle and its grounds, or Cavehill Country Park, should be included within the urban area. We therefore consider that they should be excluded from the SDL. The ULW would require to be amended accordingly.

**Recommendation**

We recommend that Belfast Castle and its grounds, and the portion of Cavehill Country Park that currently falls within the urban area, be excluded from the Belfast SDL.
**Land to North of Duncoole Gardens (also to inclusion of land in proposed AOHSV and AOCMD)**
(Objection 928)

Our comments on AOCMDs are contained in part 1 of our report. The objection site was reduced by roughly 60% at the inquiry and now lies entirely outwith the proposed SLNCI BT102/12. It comprises an area of rough grassland with trees and shrubs along the southern, eastern, and western boundaries. Within the site, land slopes markedly downwards from the north and east towards the south, where the site abuts established residential areas. Access to the site is currently via an agricultural laneway off Upper Cavehill Road. Extensive areas of Cavehill Country Park lie to the north, east and west of the site.

The objector has stated that property is available in Shancoole Park to permit access to the site. We are not convinced that visibility problems at the junction of Shancoole, Slievetoye and Shangarry Parks would be insurmountable and thus fatal to the objection proposal.

The original submission objected to the lack of investment opportunities at the Belfast Hills Access points and attached areas; this is a direct consequence of the Department's zoning policies in the area. No information was provided, explaining how the matter relates to the housing zoning sought, that would enable our consideration of the issue.

Although the site is screened from localised views within the settlement limit by the existing boundary vegetation, which forms a good edge to the urban area, longer distance views from other parts of North Belfast are possible, particularly in respect of the upper reaches of the site, towards the existing agricultural buildings. The site is also very visible from Cavehill Country Park, which is frequented by the public. The development of the site would result in urban sprawl into the prominent slopes that are an important part of the setting of the city. There would be detriment to the proposed AOHSV, of which the objection site is an important element. The allegedly limited agricultural value of the land is not a factor that outweighs our conclusions. Nor is the objector's claim that development of the site would allow improved links to the Country Park. We do not consider that the site should be brought within the development limit for housing and recommend no change to the Plan as a result of the objection.

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**Land At Crumlin Road**
(Objection 0350)

This site comprises a small roadside field on the north-western side of Crumlin Road, opposite the junction with Ballysillan Park. The objection sought inclusion of the site within the development limit.

The site is bounded on its northern, eastern and western sides by agricultural land. The Crumlin Road at this location represents a clear and defensible physical limit to the settlement. Should the objection site be included within the urban limit, it would represent an unnatural and isolated urban projection into the agricultural lands on the northern/north-western side of Crumlin Road. We do not consider that this would be
acceptable in terms of adopting a logical and rational urban form. We recommend no change to the Plan as a result of this objection.

Seeking an extension of zoning NB03/18 (also to the proposed AOHSV, SLNCIs CA 01/03 and BT 102/14, and proposed Belfast Hills Access Points as they affect the site)
(Objections 3628/1/16/17/18/20/21 & 22)

The objection site is located immediately to the northwest of zoning NB 03/18, which now contains a housing estate known as Squire’s View. The site comprises an area of agricultural land containing some trees and shrubs, which rises sharply northwards. Ground level within the objection site is markedly higher than that of the adjacent Squire’s View housing development, necessitating retaining structures on some boundaries. The new housing is visible from various locations in north Belfast and is relatively prominent on the hillside. The objector stated that the subject lands lie between the 166 and 176 contour levels, at or below the level of the adjoining development to the west.

The site is not located near a proposed Belfast Hills Access Point and we therefore fail to see how these would have any bearing on the site. Neither is any of it included in the two SLNCIs mentioned. From the vantage points, the objection site is part of the steeply rising land that forms a backdrop for the adjacent housing zoning. The housing to the west, referred to by the objector, is a very prominent feature on the hillside. Development of the objection site would result in similarly prominent housing. In our opinion, further encroachment of built development into the Belfast Hills at this location would be unacceptable and detrimental to the setting of the city, which the Plan seeks to protect through designation as AOHSV. We note the counter objector’s similar view.

The Plan contains no KSRs or individual text in respect of zoning NB 03/18. It is listed along with other zoned sites for which planning permission had been granted when the draft Plan was published. We note that work had commenced on site at that time also. Given these circumstances we do not consider that the Plan is lacking in detail with regard to NB 03/18. The existence of services/utilities, access, and foul and storm drainage capacity, capable of servicing the subject lands, does not outweigh our objections to the site in terms of urban form and visual impact. This would apply also in respect of the objector’s offer to include all or part of the site within a social housing zoning under NB 06. In line with our conclusions, it would be inappropriate for zoning NB 03/18 to be amended to make reference to development of the objection site. We recommend no change to the Plan as a result of this objection.

Lands at Wolfhill Mill
(Objection 1729)

At the inquiry the objector indicated that the site was reduced to the area outside the draft SDL. The south-eastern boundary of the site abuts the rear gardens of dwellings on housing zoning NB 04/13. Other boundaries lack physical definition. The site contains a derelict stone building, which is surrounded by mature trees. The site contains areas of rough ground, some of which are in the process of becoming
naturalised with grasses and weeds. There is rubble, clearly the remains of a building, in the north-western part of the site; this sits on a raised plateau with steeply rising land immediately to the rear. Planning approval was granted in 2007 for housing on land to the east of the site. The layout drawing indicates use of the objection site as a combination of formal and treed open space, with pedestrian access to the adjacent Belfast Hills.

The objector argued that the site should be incorporated into the SDL and that housing located in the north-western half (approximately) thereof would provide supervision over the remaining area, which would become open space, and an adjoining dam.

The status of the site as amenity land within the SDL in BUAP is not determining in the context of adopting a new development plan. The majority of the site has been cleared and it no longer has an urban character. The fact that it formerly contained a mill complex does not dictate that the site should automatically be included within the settlement. The plan submitted by the objector indicates housing on the higher parts of the site, the majority of which is regenerating woodland that lies into the base of the escarpment. This part of the site lies within the proposed SLNCI BT102/22, to which objection 1729 did not refer. Neither did it raise an objection to the proposed LLPA BT125, which includes the entire site. We do not accept the objector’s submission that housing on the site would have little impact on these designations. We see no need for new buildings to compensate for the loss of the former Wolfhill House.

The objector recognised that the site is a transitional area between the steep escarpment and the lower-lying areas, which have been developed for housing. We note that the Plan proposes a Belfast Hills Access Point at the site and this has been reflected in the aforementioned 2007 approval. We observed fairly intensive use of the site and adjacent lands by the public for walking and access to the mill dams. There is no evidence of serious antisocial behaviour, which is not uncommon on many open spaces in any event. We consider that the site has considerable value as amenity space and in terms of provision of the aforementioned access point. We do not consider that it should be brought within the SDL or zoned for housing. Neither do we see any benefit in it being zoned as open space within the urban limit, since PPS8 would afford it protection in any event. Whilst there may be some benefit in the area and access point being directly overlooked, this would not outweigh our conclusions. We do not accept that development of the site would represent rounding off of the area; rather, it would extend the development limit illogically into the countryside and AOHHSV. We recommend no change to the Plan as a result of this objection.

Lands between Lyndhurst and Ligoniel
(Objections 2529/5 & 2850)

Objection 2529/5 related to a large site adjoining north and west Belfast. The objectors’ agents confirmed that only two small sites were being pursued. We will not therefore consider the remainder of the original site. Site one is two small fields adjacent to zoning NB03/21 and NB05/15 (this is part of objection 2850 also). The case was that this would represent rounding off of the adjoining development to a better defined settlement limit. A road linking the two zonings had been approved running through the objection site, it was claimed.
We agree with the Department that the land beyond the objection site falls away and that the larger of the two fields is quite prominent. The latter concern would not apply to the smaller field, however, and development thereon would be seen as a rounding off of the SDL at this location. We note that, whilst the site is within a proposed AOHSV, this is a blanket designation covering all of the Belfast hills outside the development limit. The loss of this small field would not be significant to its overall value or function. We have considered the objectors’ point regarding a softer edge to the limit being provided. The key site requirements for the adjoining housing zonings require the provision of an 8-10m wide belt of landscaping along the development limit. It is the case that the existing hedge along the southern (SW) boundary of the site is substantial. We consider that any additional landscaping would have to be provided within the development limit, not outside as suggested by the objector. This would ensure that the built development was set back from the edge of the slope identified by the Department.

The Department requested key site requirements related to a low density (maximum 20 dwellings) and single storey. There are no such requirements on NB05/15, which is at a higher elevation.

Recommendation

We recommend that the site as shown on PLAN 1 be included within the development limit, subject to a key site requirement requiring the provision of a 8-10m landscaping belt inside the existing hedge and outside private gardens.

SOUTH BELFAST

Various objections to the SDL in south Belfast were submitted. These are dealt with in the chapter on LVRP.

EAST BELFAST

Lands at Glenmachan (also to proposed LLPA, SLNCI, and AOHSV designations) (Objections 361, 362, 374, 502, 1929, 3071, 3116)

At the Inquiry the 3071/3116 objection site was reduced to two parcels of land; 5ha at Old Holywood Road and 18Ha of land at Glenmachan and Quarry Roads. Objections to proposed LLPA designations BT110 (Belmont Glen), BT127 (Glenmachan Garnerville) and SLNCI Designation BT102/08 (Belmont Glen) were withdrawn. Objections 361, 362, 374, 502, and 1929 are contained within objection lands 3071/3116.

Old Holywood Road

This portion of the site comprises the western, parts of two large fields in grass. The eastern boundary is undefined. The land rises markedly from the road. Whilst there are hedges on the road frontage, views into the site are readily possible on Old Holywood Road when approaching from the north and south.
It is our view that Old Holywood Road forms a strong and defensible edge to the settlement at this location. Land on its eastern side has a topography significantly different from lands to the west, which are occupied by housing. In our opinion the site is an integral part of the Craigantlet escarpment, which is critical to the setting for the city and an important element in the AOHSV. The site is a natural part of the countryside and we consider that extending the settlement across Old Holywood Road would be illogical. Adopting a good design, providing new planting and restricting development to land below the 45m contour would not mitigate against the unacceptable visual impact of the proposal.

**Glenmachan/Quarry Roads**

The southern portion of objection site 3071/3116 is comprised of various parcels of land, which straddle Quarry Road. The northern part is a large field in grass with substantial tree belts defining the northern, western and southern boundaries. The field rises steeply from west to east. A wooded area to the east of Glenmachan Tower is also included. The lands to the south of Quarry Road include a large field with frontage to both Glenmachan and Quarry Roads (objection site 1929); this rises markedly from west to east. The spacious plots of several dwellings make up the remainder (objection sites 361, 362, 502, and 374). There are two sizeable ‘gaps’ in the continuity of the composite site, one at Glenmachan Road and one on Quarry Road.

In our opinion, Glenmachan Road forms a logical edge to the settlement at this location and delineates the transition between the escarpment and lower land to the west. Whilst the large field to the north of Quarry Road is well screened from the local road network, it is clearly visible from the City Centre. The screening effect of the largely deciduous tree belts is significantly less effective in winter months. Even low density housing would be seen, extending up the escarpment, to the detriment of the city’s setting. We consider that this part of the site is an important element in the proposed AOHSV. The large field on the southern side of the Glenmachan/Quarry Road junction is particularly visible from the adjacent roads. It is an attractive feature, which is clearly part of the escarpment and has a very rural character. We do not consider that an extension of the SDL to incorporate this field would be logical. This field also is an important element in providing a setting for the urban area, and warrants inclusion in the AOHSV.

We accept that, due to screening, there may be ‘pockets’ of land within the remainder of the objection lands on the southern side of Quarry Road that could accommodate limited development without major visual impact. However, extending the settlement limit to include these, whilst excluding the abovementioned fields, would result in an entirely illogical extension of the settlement into the countryside. This would not promote compact urban form. We do not accept that there is any justification or need to provide a transition between the low-medium density housing to the west and the more agricultural lands to the east. We consider that these lands should remain within the AOHSV.

We attach no significant weight to past opinions expressed by individual Commissioners, which were formed in a different policy context, where less emphasis was placed on the importance of the city’s setting; in any event, the Commission did not agree with their conclusion in respect of the site for reasons relating to visual amenity.
We do not consider that the physical environment of the area has changed significantly in the intervening period. We do not consider that the proposal to provide very low density housing renders the objection lands acceptable. We recognise that many of the urban sites identified in the Plan will inevitably be developed at relatively high densities, but this is in line with the strategic drive to maximise the use of urban land. We consider that a good supply of large, high-quality dwellings already exists within lower density neighbourhoods inside the urban limits to provide the choice of housing promoted in the RDS. For those seeking very large plots in a semi-rural setting, the purchase of a dwelling in the countryside could be an option. We do not agree that it is more sustainable to have large homes for affluent members of the community in close proximity to urban areas than scattered throughout the countryside, if it is to the detriment of the setting of the city. We have already accepted that there is a shortfall in housing land provision in Belfast District but this cannot be addressed by the release of environmentally unacceptable sites; in any event, the density of development proposed on this site would do little to address the shortfall.

Whilst we acknowledge that some sensitive development could assist in protecting and managing woodland at this location, the benefit does not outweigh the shortcomings of the objection lands in terms of impact on the setting of the city. We note that there are no identified impediments to development in terms of infrastructure but this does not render the sites acceptable; neither does the accessibility of the lands to a wide range of social, community and employment facilities. The offer to provide significant planting to reinforce existing and create new wildlife corridors does not override our conclusions; nor would imposition of KSRs and careful design, in an attempt to limit the visual impact of development. We do not consider that the construction of the Church Of God has changed the appearance of the surrounding area so significantly that it no longer has a rural character. We see no significance in the absence of counter objections.

In reaching our conclusions, we accept that development of the subject lands in the manner submitted by the objector need not unacceptably impact upon the proposed BT 102/31 SLNCI, which we consider is justified. We note the Department’s view that the extent of the SLNCI could be reduced by excluding Nos. 69 and 71 Quarry Road; we have no reason to demur.

**Recommendation**

We recommend that SLNCI BT 102/31 is reduced to exclude the area indicated on the attached PLAN 2.

**Lands at Belmont Road/Ballymiscaw Road**

*(Objection 3165)*

This site is located on the eastern side of the junction of the Glenmachan and Belmont Roads and contains a number of buildings. The site is well screened from view by existing mature boundary vegetation and walls. Only the small gate lodge at the entrance is clearly seen. There are large areas of established housing to the south and east, on the opposite side of the road. The objection sought inclusion of the site within the settlement limit as a DOS, primarily housing. We note that there was no mention of the proposed LLPA or AOHSV designations in the original objection and we do not
therefore propose to consider the arguments put forward in later submissions in respect of these designations.

Our conclusions on the zoning of DOSs are set out in part 1 of our report. The subject site does not meet the criteria for such a zoning; it is not vacant or underutilised land and it currently lies in the rural area.

There is a complex of buildings to the east of the site, on Belmont Road and a dwelling in well screened grounds immediately to the north; there is no objection seeking inclusion of the latter within the SDL. Objections 3071 and 3116 originally sought inclusion of the former within the urban area but an amendment subsequently excluded the land from the objection.

Whilst the walls and boundary treatments at the objection site announce that the land is not agricultural; neither does it have the overtly urban character of lands to the south and west. It is not unusual to find large properties, whether residential or in other uses, on spacious sites just outside settlements; the fact that the site contains some built development in no way automatically justifies its inclusion within the urban limit. The buildings within the site have little visual impact and no significant visual connection with residential areas to the south and west. This would inevitably change if the site were brought within the SDL and more intensively developed for housing, which would be probable, notwithstanding the presence of a listed building on the site. Development of the subject land would illogically extend the settlement across two public roads which currently represent a clear and defensible edge to the settlement. If the site were to be brought within the settlement, it would result in an unnatural and illogical protrusion of the urban/rural boundary into lands that we consider more naturally fall into the rural area.

The sustainable location of the site does not outweigh our conclusions. Neither does the objector’s offer to allocate part of the site for social housing. We recommend no change to the Plan as a result of the objection.

Objection 2165

This site comprises a number of fields on the southern side of the Belmont/Ballymescaw Road. The land within the site slopes markedly towards the south, where it abuts well established housing. The Stormont estate lies to the east and there is residential development to the west. The site appears to be used for grazing and contains a number of trees and shrubs. Southern, eastern and western boundaries are defined by a mixture of trees, hedges and fences.

We are not convinced that housing on the site would be seen as a visual encroachment into the setting of the Parliament Buildings at Stormont, given the degree of visual separation and the strong vegetation within the Stormont Estate abutting the objection site. Housing on the site might somewhat impede views over the city when travelling southwest on Ballymescaw Road but we do not consider that this should be fatal to the proposal; nowhere can we find reference in the Plan to the need to protect views into the city. The site falls into a 2-dimensional indent in the SDL. We consider that the Belmont/Ballymescaw Road would represent a defensible limit to the urban area in
terms of its elevation relative to the site and the physical barrier that it creates. We are of the opinion that careful design of the development, restrictions on ridge heights on the upper areas of the objection site, careful design of the access, and significant landscaping could ameliorate the visual impact of any new development relative to the critical views raised, some of which are long-distance. From these the housing would not be particularly discernible in the wider panorama of low density housing in a reasonably well treed townscape. We note there is existing development to the north of the objection site that does not have a particularly marked impact in the landscape. Subject to a sympathetic scheme design, we do not consider that development on the site would have an unacceptable visual impact.

Our conclusions on the proposed AOCMDs are contained in part 1 of our report. Roads Service indicated that, should the Commission determine that the site should be included within the SDL, access to it could be accommodated, notwithstanding the issues raised by the counter objectors about the suitability of Ballymiscaw/Belmont Road. Given the speed of traffic on the road, together with its horizontal and vertical alignment, we are not convinced that the issue of road safety can be so easily set aside. Similarly, given the quantum of third party land that would be required to provide a link to the existing public footpath on Ballymiscaw/Belmont Road, we have concerns that this issue could be a major impediment to the development of the site. We are not persuaded that the imposition of KSRs would be sufficient to deal with these matters. We have no evidence that there are insurmountable problems with foul or storm drainage in the area.

The site lies within proposed SLNCI BT 102/27. The Countryside Assessment refers to the SLNCI containing scrub, grassland and less mature woodland with Jay, Buzzard, Blackcap and Red Squirrel using the land. The original objection did not refer to the proposed SLNCI; the matter was raised subsequently. This goes beyond the scope of the objection and we cannot take the arguments against the designation into consideration. The SLNCI on the site must therefore be confirmed. We agree with the Department that use of the site for grazing does not adversely affect its nature conservation value. We accept the argument that development of the site for housing would have an unacceptable impact on this part of the SLNCI and could adversely affect other parts of the designation immediately adjacent. Given this, we do not consider that a housing zoning on the site would be appropriate, notwithstanding our conclusions in respect of visual impact. We consider that the site should remain outwith the SDL and within the AOHSV. We therefore recommend no change to the Plan as a result of the objection.

Objection 2899

This objection relates to two areas of grazing land on the northern side of Belmont/Ballymiscaw Road, where topography rises markedly away from the road edge. The western parcel of land is bounded to the east and west by residential properties. The eastern part of the site is bounded by a dwelling to its west.

We have already concluded that the Belmont/Ballymiscaw Road represents a defensible settlement limit at this location. Notwithstanding the presence of residential
property within it, the land on the northern side of the road has a character which is more rural than urban. Encroachment of further development onto the Craigantlet escarpment on the northern side of the road would result in urban sprawl onto prominent sloping land. We agree with the counter objectors that the objection lands are an important part of the setting of the city and this warrants their retention within the proposed AOHSV. It would result in an illogical extension of the settlement limit, beyond the natural stop line of Belmont/Ballymiscaw Road.

We do not agree that inclusion of the lands would represent an infilling of a notch in the current pattern of development, or result in a compact urban form, as argued by the objector. We note that adjacent residential properties lie on sites outwith the settlement limit and are not the subject of objections seeking inclusion. Whilst a need exists for additional housing in Belfast, this does not override our conclusions in respect of the objection lands; neither does the physical suitability of the land for development. We recommend no change to the Plan as a result of the objection.

**Lands at Stoney Road**  
(Objection Site 3072)

This objection site was reduced to 14 hectares and its northern boundary is now in line with the northern boundary of MCH 05/09 - Stoney Road housing zoning to the east. The objection site lies to the north of Knock Golf Course which forms part of the extensive Dundonald Urban Landscape Wedge - designation BT 100, which stretches to the south and includes Dundonald Cemetery and Dundonald Leisure Park. Development on the objection site would enclose the northern edge of the Wedge with built development. This would result in the continuity of the Wedge into the countryside being broken. Development would then visually ‘straddle’ the ULW, which divides Belfast and Dundonald and would unacceptably prejudice its strategic functions. The objector made comparisons with the objection site and the adjacent MCH 05/09 housing zoning in terms of elevation and prominence, however as the objection site adds to the separation provided by the ULW, it is distinguishable from the adjacent zoning MCH 05/09. In any case, we have recommended that zoning MCH 09 be deleted. The objector did not explain why the site should be excluded from the SLNCI designation which affects a tiny portion of the site. We agree with the Department and the counter objectors that development on this prominent site would extend development onto elevated and rising open countryside which can be viewed from many long and medium range viewpoints across Dundonald. Its development would therefore prejudice the functions of the extensive AOHSV which was designated to protect the setting and slopes of the City. Accordingly we recommend no change to the Plan as a result of this objection.

**WEST BELFAST**

**Hannahstown Hill Lands**  
(Objections 3825/42, /52 & /63)

The format of the objection has caused us some difficulty with consideration of this area. The main objection merely refers to the Hannahstown Hill development being
restricted by the current development limit and to a current planning application. There is a reference to further details being included in Appendix 9 attached to the submission. We have assessed the sites and plans in Appendix 9. This section of the report also addresses all the substantive objections in that Appendix. These objections on behalf of NIHE related to lands south of Upper Springfield Road from west of Zoning BT 007 across to Hannahstown Hill. The objections related to the Plan proposals for the wider area and suggested that a more comprehensive approach to the housing needs and traffic problems of the area was required. The impetus was the critical social housing need in West Belfast. The objection sought the exclusion of some lands from the settlement limit in Zoning WB 05/17 (which is also WB06/28) and elsewhere. This is also the tenor of objection 984, which related to curtailing development on the higher parts of the zoning. The objection sought the inclusion of lands within the settlement limit and their exclusion from the Green Belt and Designation CA03 – Hannahstown RLW. The objection sought a comprehensive approach to thezonings in the area including WB 05/17 (WB 06/28), BT007, WB 06/25 (WB03/19) and TC01 – Travellers’ site. NIHE would provide a new road from BT 007 across to Hannahstown Hill in return for gaining development land. This road would provide an alternative to the current lengthy cul-de-sacs off the Glen Road. Existing open space would be safeguarded and a final development limit provided for the area by woodland planting on the remainder of the site up to the Upper Springfield Road. The proposal had the support of WBP and was the subject of wide ranging consultation, it was stated.

The site is within an AOHSV and partly within the Hannahstown RLW. The site is in a prominent location in the Belfast Hills. The steep slopes are a distinctive feature of the setting of the city. It is against this background that we will assess the development areas as indicated on the plan – annotated A to C. Area A is the largest of the sites. It extends up the slope to the settlement limit of Hannahstown. We consider that this proposal would erode the separation between the village and Belfast. It would intrude on the setting of the city and be very prominent, notwithstanding the offer of planting, which would take years to mature. Development would be prejudicial to the AOHSV and RLW for these reasons. We therefore consider that this area should not be included within the settlement limit. The critical need for social housing in west Belfast has been considered in Part One of this report. In addition, the release of BT007 for mixed use development will contribute to meeting the needs of the area. We consider that this zoning and the existing social housing zonings (WB 03/19 & WB 05/17: WB 06/25 & 28) will provide for these needs to an equal or greater extent than the objection lands. We note that NIHE did not pursue this objection further by the submission of any evidence and so the updated housing need situation was not addressed by them. We do not discern a lack of a comprehensive approach to the zonings in this area nor a particular traffic issue that would warrant the provision of a new road within an AOHSV.

In terms of Area B and the consequential reduction of Zoning WB 05/17, we consider that the proposal would make little difference to the quantum of land for social housing. The amount of land lost would equal the amount gained. We can see no real gain in terms of visual impact either because area B would be as high up the slopes as Zoning WB 05/17.

Area C is two small pockets of land that were related to NIHE proposals to re-develop the adjacent playing fields for housing. This was on the premise that the playing fields lost as a result would be replaced within Zoning BT 007. We have no evidence that this
issue was discussed with the owners of that site. There was no reference to this matter in their submissions to the Inquiry. There is therefore a real issue of prejudice to the developers of that zoning and the Plan itself in this proposed re-location because of the importance of this Zoning to the development of the area. We cannot agree with the loss of these playing fields as part of this objection in the absence of any realistic proposals for their replacement. The development of these two small parcels of land would not be viable on their own. We recommend no change to the Plan as a result of these objections.

Objections adjacent to Monagh By-Pass including the failure of the Plan to provide for an extension to Monagh By-Pass
(Objections 471/24, 3303, 3769, 3771, 3772, 3775, 3777, 3778, 3779, 3780 & 3839)

Objection 471/24 referred to the absence of an outer west Belfast ring road in BMTP. This is not an objection to BMAP. The stated purpose behind the objection was for the road to act as a barrier to any further outward expansion of the city in this direction. It is not necessary to construct a major dual carriageway just to provide a boundary for the city.

Objections 3303, 3769 and 3839 sought an extension of Monagh Bypass as far as the Ballygomartin Road. The case for such a proposal was to provide traffic relief on the Springfield Road and West Circular Road. Springfield Road is an Arterial Route. The proposal would assist in relieving congestion problems at several junctions between Upper Springfield Road and West Circular Road and reduce journey times. The proposed road would facilitate the zonings in the area. It would also have a strategic function as part of a west Belfast ring road as proposed in the Belfast Urban Area Plan (BUAP). The proposal would be developer funded and was of a type envisaged by BMTP, it was claimed.

The background to these objections is that there are related objections seeking the land between the proposed road and the existing development limit be zoned for housing. This is the primary focus of the objections and the source of funding for the road. The objector incorrectly argues that a scheme for a ring road was included in BUAP. A scheme was proposed in the 1978 transportation strategy. This strategy was reviewed by BUAP and a number of road schemes were abandoned in that plan (1990), including the Outer Ring Road West. Such a proposed road is not included in BMTP or BMAP. There is no policy support for the proposal. The proposal is not required to facilitate the development of housing zonings in the Plan. The proposal would not in itself serve any strategic function because it will not provide a link around Belfast of itself. We agree with the Department and counter-objector that there are potential environmental implications from the overall scheme. The Belfast Hills within the site are an important part of the setting of the city, which should form part of the proposed Area of High Scenic Value. Development of the road would impact negatively on the setting of the city and the AOHSV. The development could also adversely impact on archaeological remains in the area and its recreational value. We consider that any benefits of easing traffic congestion as a result of the proposed road would be localised and minor in nature. They would not justify a new road and housing development of the scale proposed in an Area of High Scenic Value. We consider that individual road schemes have to be assessed against their particular policy context and by consideration of their
role and function. The related housing objection sites would extend development up the slopes of the Belfast Hills. This extension would be major and very prominent in many places. The development of these sites for housing would also be detrimental to the setting of Belfast and the AOHSV. Some of the sites are also in a proposed SLNCl and development would be detrimental to the nature conservation interest of the area.

Objection 3780 was a related objection to the failure to identify a Belfast Hills Access Point (Designation CA 04) associated with Monagh By-Pass extension. This objection stands or falls with the proposed road scheme because there is a designated Access Point at the settlement limit in the Plan (CA 04/03).

Objection 3779 related to a former Travellers’ site outside the development limit adjacent to the end of Monagh By-pass. The objection simply stated that it was not zoned as a Travellers’ site and should be so zoned. There was no justification for the objector’s proposal. The site has not been used for some years and has completely returned to pasture with no evidence of its former use. There is a designated Travellers’ site (TC02) in very close proximity, which is in the process of being developed. In these circumstances, we see no justification for the objection to be upheld.

Objection 3771 related to unzoned land within the development limit to the north of TC02. The objection sought its zoning for housing. The Department at the Inquiry agreed with the objector that the land should be zoned and suggested several key site requirements. The Department indicated that the area may have been the subject of landfill operations and a full site investigation may be required to establish exactly where those operations took place within the site, the type of materials deposited and any remedial work required. We consider that the issue of land contamination could go to the principle of development on the site and therefore it would not be appropriate to zone the site for housing. A decision on whether the site can be developed can only be taken after the results of a site investigation are known.

We recommend no change to the Plan as a result of any of these objections.

**Lands at Whiterock Road**
(Objection 2978)

This objection site overlapped with the MBA objections 3777 and 3775 but extended further up the mountain. The objection referred to the inadequacy of the Belfast Hills access point at the Whiterock Road (CA04/03). It proposed a visitor centre towards the top of the site, which would provide access and facilities for the Belfast Hills. In return a modest level of housing was proposed on the lower part of the site, which would be appropriately landscaped and screened. The site is an important part of the setting of the city and is included within the AOHSV for this reason. We consider that any development on the site would be inappropriate because it would be prominent and negatively impact on the setting of the city. The development of this site in isolation from the others considered above would have a very prominent peninsular effect that could set a precedent for further encroachments into the Belfast Hills. Any benefits that would result from the proposed visitor centre would not outweigh the environmental concerns related to the site. We therefore recommend no change to the Plan as a result of this objection.
Lands North of Ballygomartin Road
(Objection 129)

This objection related to an extensive area of land including zoning WB05/16 and lands to the west. The objector’s case was that part of the land was zoned but the remainder was excluded and he couldn’t understand why because it had always been whiteland. The Department has re-assessed the BUAP whitelands and removed some from the settlement limits, which is a valid approach in a new Area Plan context. We consider that the development limit needs to be critically appraised in the light of current planning circumstances. This site extends well beyond the proposed development limit and is within a proposed AOHSV and partly within a SLNCI. There are areas of mature woodland within the site and it is steeply sloping. We consider that it makes an important contribution to the setting of Belfast and should remain outside the limit and within the AOHSV. Development would negatively impact on the setting of the city because of the topography and location of the site and should be resisted. In any event, a large part of the site is occupied by a reservoir. This would be a significant if not insurmountable constraint affecting any development of the site. We recommend no change to the Plan as a result of this objection.

Lands between Lyndhurst and Ligoniel
(Objections 2529/5, 3092 and 3096)

This site is adjacent to housing zonings WB 05/14 and 02/22. It includes part of objection sites 3092 and 3096. It is a site projecting northwards and includes part of a SLNCI (BT 102/02) and a small part of LLPA BT 126. The remainder of the site is in the large SLNCI BT 102/05. The proposal envisaged limited development on a well-enclosed and screened site. In return the developers would donate the remainder of the reduced site to the city council to extend Glencairn Park to the Belfast Hills and connect the Lyndhurst area with the park. The Department’s concerns were the loss of species rich grassland (which is an important habitat and a small proportion of the large SLNCI), the form of the development creeping up the hillside and management issues associated with the proposed open space.

The proposed development, whilst in a dip and well-screened from short to medium range views, would not represent rounding off of the existing or proposed settlement limit. It would involve development extending further out in this location in a peninsular fashion. The development would adversely affect a proposed SLNCI, although we accept that this would represent only a small part of the SLNCI, the unrebutted evidence was that the type of habitat affected was quite rare in the overall SLNCI and in Northern Ireland as a whole. The objectors’ argument that a small effect on a rare habitat is immaterial is not accepted. The loss of an important habitat is a material consideration. We do not consider that the envisaged community benefits would outweigh the environmental and planning concerns with the site. The proposed transfer of land to the council has not been discussed in any detail with them. This does raise issues around maintenance and control of access. We need not consider these issues further as we consider the site to be unsuitable for inclusion within the development limit. Most of the land in question comprises existing woodland within a SLNCI and is therefore unsuitable for development in any event. The proposed access to the Belfast Hills could be provided in association with the development of zoning WB05/14. We therefore recommend no change to the Plan as a result of these objections.
**Land at Somerdale Park**  
*(Objection 2209)*

Somerdale Park is a residential street off the Crumlin Road. The site is at the end of the street and is enclosed on all sides by high fencing. It is at a higher level than the adjacent Clarendon Park. A bowls club lies to the north and a lane leading to Forth River Park lies to the south of the site. The counter-objector’s only concern related to access to the parks. As the lane is outside the site, this access is not affected by the objection.

One element of the objection was to the site’s inclusion in LLPA BT125. The Department confirmed that this enclosed site containing only young vegetation had limited landscape amenity value and could be excluded from the LLPA. We agree with this assessment and consider that the site’s peripheral location relative to this extensive LLPA means that the site could easily be excluded.

The site is identified as existing open space in the draft Plan. Planning permission for 17 dwellings was granted on the site in 1997. We were informed that the Department indicated at that time that consultees had no objections and Belfast City Council did not require the land as open space. We were informed that this was still the Council’s position and given the adjoining parks, it is a perfectly understandable one. The Department maintained that the site should be retained as open space and that PPS8 marked a change in circumstances since the previous approval. We do not necessarily agree with this proposition as BUAP showed the site within an area reserved for landscape, amenity or recreation use and Policy R1 referred to the protection of existing open spaces. In any event, this plan represents an opportunity to re-consider open space and assess its contribution. This relatively small site is fenced off and appears to have been so for many years. It has no public access and limited amenity value. There are large parks immediately adjacent to the site and the council has no interest in the site. The site did benefit from planning permission for residential development, which lapsed approximately 10 years ago. It is a windfall site located well within the settlement limit and so the strategic housing need arguments are not relevant. In all these circumstances we consider that the site could be zoned for housing and recommend accordingly. The Department did not suggest any key site requirements for the site. There are no particular requirements for this site that were drawn to our attention.

**Recommendation**

We recommend that the site is removed from LLPA Designation BT125 and is zoned for housing.
OBJECTIONS TO HOUSING ZONINGS

NORTH BELFAST

Zoning NB03/06 – Waterloo Park/Inisfayle Park
(Objection 2127/1)

The objection sought amendment of KSRs and deletion of a reference to a TPO on the site.

The Department indicated that the lands subject to this objection now benefit from planning permission, subject to conditions, and that those conditions were considered sufficient to allow for a satisfactory form of development. The Department conceded that the KSRs are no longer necessary. We agree with the Department’s analysis. It is a matter of fact whether or not there is a TPO currently affecting the site. Given this, and the extant planning approval, we see no need for BMAP to refer to the TPO.

Recommendation

We recommend that the KSRs relating to zoning NB03/06, and the reference to a TPO on the site, be deleted from the Plan.

Lack of Integration of Ligoniel Housing
(Objection 2965/135)

Belfast City Council argued that the proposed Ligoniel housing sites are isolated, suffer from poor transport links, and are not designated as being on an Arterial Route; the Plan should propose measures to ensure the integration of such developments as an example of integrated planning and transportation.

The nature of the physical constraints around Belfast have resulted in growth occurring primarily where the least environmental intrusion has resulted. It has also reflected a marked need for new housing in the western parts of the city. As a result, the availability of public transport has inevitably not been a determining factor in the location of the zonings. The Department’s exercise to identify additional housing land has resulted in zonings throughout the city, some of which lie on, or close to, main public transport or Arterial Routes, and others that are more peripheral such as the Ligoniel area on the north-western edge of Belfast. Here, new housing sites have been identified in the draft Plan, where physical constraints were deemed to allow for same.

We consider that it is for the BMTP to direct the future growth of the public transport network in Belfast and we would anticipate that major new areas of housing at Ligoniel would be catered for. We do not consider that housing should be located only adjacent to Arterial Routes as this would greatly constrain the exercise of identifying new housing land. In any event, public transport routes are not tied solely to such routes. We recommend no change to the Plan as a result of this objection.
Zonings NB03/21, NB04/13, and NB05/15. Also to SLNCI Designation 102/22 and AOCMD
(Objections 1962, 1977, 1995/1&2, 2850/7 & 2855/3)

These zonings are contiguous and lie to the south-western side of Ligoniel Road.

Objections 1962 and 1977 argued that the proposed designation of the SLNCI and AOCMD, in conjunction with housing zonings NB 03/21 and NB 05/15, would be ambiguous and misleading. We have already commented on the proposed AOCMDs in part 1 of our report. With regard to the other matters, both the zoning and the SLNCI are clearly demarcated on the relevant Plan maps. There is a degree of overlap and this is clear from an examination of those maps. We also note that Plan refers to the SLNCI in the text relating to NB 05/15. In the absence of any explanation from the objector, we fail to see how the Plan is either ambiguous or misleading.

Objection 2855/3 sought removal of zoning NB05/15 from the development limit. The submission also raised a query regarding the numbering of zonings in relation to ownership of land. It was pointed out that NB03/21 is in multiple ownership. Objection 1995 related to the KSRs affecting the block of land containing all three zonings. Objection 2850 also related to the key site requirements for Zoning NB03/21.

The Department indicated that planning consents have been granted on all of the zoned lands and that the attached conditions were considered sufficient to allow for a satisfactory form of development. The Department conceded that the KSRs are no longer necessary. We agree with this analysis. It would clearly be inappropriate to exclude zoning NB05/15 from the settlement limit, given the planning consent. The ownership of land within NB03/21 is not a matter which BMAP need address.

The Ligoniel Improvement Association objection submitted that no new housing should be permitted in the area until the sewerage system has been upgraded to provide adequate capacity. This is a matter for relevant government agencies to address. The housing zonings in the Plan were subject to consultation with Water Service and we assume that infrastructural needs would have been a factor in considerations. Such matters can be addressed as part of the development management process and do not necessitate an amendment to the Plan.

Recommendation

That the KSRs relating to zonings NB03/21 and NB05/15 be deleted from the Plan.

Zonings NB 04/01 - 15 Prince’s Dock Street, NB04/05 - James Clow Mill and NB05/06 - 61 Dock Street
(Objection 2015/12-14)

This objection relates to 3 small adjacent housing zonings in the Pilot Street/Prince’s Dock Street area. The zonings are shown on Map No. 3/001 and not 4/001 as the draft Plan states. The objection sought the removal of all three zonings from the Plan. The two NB 04 zonings have been developed for residential use and so the objection to them is redundant. There is no need to zone them for residential development either. The objector initially sought a mixed use zoning for the remaining zoning, as the
surrounding area is zoned for employment uses. At the hearing it was suggested that the zonings be deleted and left as whiteland. The Department agreed with this suggestion. In the context of the need for housing land within Belfast City, we are surprised at the Department’s stance. However, in this evidential context and given the small size of the site, we agree with the parties that the land should not be zoned.

**Recommendation**

That the Housing Zonings NB04/01 - 15 Prince’s Dock Street, NB04/05 - James Clow Mill and NB05/06 - 61 Dock Street be deleted from the Plan.

**Zoning NB06/13 - Milk Marketing Board Site, Antrim Road (note currently zoned employment/industry)**  
(Objection 2567/2, 2965)

Objection 2567 referred to the location of the site within a Conservation Area and appeared to raise concerns with regard to design matters. We reiterate that it is not within the ambit of BMAP to amend Conservation Area Boundaries. It is for the development management process to determine the suitability of a particular scheme.

We note the objector’s comment that the subject site is identified on Map 4/001 as ‘Shopping/Commercial Area’, and on Map 4/170 as social housing zoning NB06/13. This discrepancy has been addressed in Plan Amendment No. 1, Map No.5, which identifies the site as being excluded from the Shopping/Commercial Area.

The majority of the land has been redeveloped for housing and it is therefore irrelevant whether or not the social housing zoning is retained on this portion. A petrol filling station is located to the south of the new housing. We consider that the social housing zoning should be retained on that part of the site, in order to reflect the marked need for social housing in the city. We recommend no change to the Plan.

**SOUTH BELFAST**

**Zoning SB02/22 - Lands at Belfast City Hospital**  
(Objection 906/16)

The site is located within the Belfast City Hospital complex, is surrounded on all sides by hospital land uses, and is presently occupied by a high-rise residential block known as Bradbury Court. The evidence states that this was constructed around 6 years ago. This objection argued that access to the site should not be taken through the Belfast City Hospital site.

Given the location of the site, the only possible access would appear to be via the main road serving the BCH complex, Jubilee Road. The site appears to have been developed with such an access. We recommend no change to the Plan as a result of this objection.
Planning Appeals Commission

Zoning SB03/13 - Land South of Riddel Hall, Stranmillis Road, also to ATC Designation BT072 - Stranmillis Village
(Objections 1359/1, 1377/5, 1807/15, & 3597/4)

QUB objected to the zoning and its precise boundary. The objection stated that the site is appropriate for University-related development. We were presented with no detailed reasoning as to why the proposed zoning is inappropriate. The fact that it may be suitable for other types of development does not, in itself, preclude housing on the site.

The Plan states that the site has outline planning approval for 14 dwellings. The Department indicated that the approval dated back to 1999. We are unsure as to whether further consents have been granted. The objector’s argument that the permission for housing “should be removed” is not a matter that the Plan can address. Visually, the site is a discrete entity, well enclosed by existing vegetation, and unrelated to other residential areas in Stranmillis. We therefore cannot support the objector’s assertion that the proposal would conflict with the character of the area. We see no reason why housing on a site that is physically disconnected from the street/road frontage and other housing could inherently be an unacceptable concept. We do not accept that the ‘neighbourhood’ in Stranmillis can be defined only as the area of existing terraced/street frontage housing and see no reason why new housing on this site could not be described as being part of the area. We have no information as to the details of the proposal and thus cannot comment on the objector’s concerns about the likely form that the housing might adopt. We are at a loss to understand the objector’s point in that “There is no further capacity on the Stranmillis Road network for new houses with off street parking provision”. Clearly, the parking and access arrangements must have met the Department’s requirements in order for approval to have been granted. We do not accept that there need be a conflict between housing and the environmental designations affecting, or adjacent to, the zoning. We note the KSR requiring that the development of the site shall incorporate pedestrian access to the adjacent LLPA. The KSR does not indicate whether or not the access should be available for use by the general public; this would be a matter for the development management process. We fail to see how housing within the zoning could undermine the use of Riddel Hall. There would be no impediment to a proposal for student housing within the site; such would represent a residential use.

The objection from the Stranmillis Residents Association sought the redesignation of the ATC as a Conservation Area; this matter is outside the scope of the Plan and cannot be considered any further.

We note that objection 1359 referred to Plan policy HOU6. Our recommendations in respect of same are contained in part 1 of our report. The HMO Subject Plan was adopted by the Department in December 2008 and sets out the policy context for the assessment of HMO proposals in the Belfast City Council Area. We recommend no change to the Plan as a result of this objection.
Zoning SB05/02 – Land adjacent to Musgrave Park Court  
(Objection 2841/1)

This objection was to the KSRs relating to zoning SB05/02. However we were not presented with any reasoning that would permit our further consideration of the issue.

Zoning SB05/03 - Land to rear of Belfast City Hospital  
(Objections 1807/17, 3825/71, 1047/1, 3166/1)

The site is located in the western apex of the BCH site and is presently occupied by buildings and car parking. There is no natural definition to the boundaries with the remainder of the hospital site. Terraced housing in Dunluce Avenue abuts the southern side of the site and the Belfast to Lisburn railway line lies to the west.

It was argued that the KSRs should contain a requirement for creation of a buffer, between the housing zoning and the adjoining hospital lands. Whilst we see merit in this, the limited dimensions of the site and the inner urban location would point away from the provision of a substantial landscaped strip. We envisage that the boundary treatments adopted in order to comply with the 5th bullet point of the KSRs are likely to provide strong definition for the site.

A concern was raised that the housing zoning would result in the loss of critical car parking for the hospital. We were presented with no persuasive evidence that a shortage of parking exists in the BCH site, particularly in view of the recent construction of multi-storey car parking within the hospital grounds. We are also mindful of the hospital’s location on main road and rail networks, which facilitate the use of public transport. We are not convinced that the traffic and parking problems raised are confined only to the area around the objection site or would weigh heavily against redevelopment of the site as a valuable housing resource. Issues such as speeding and illegal parking can be dealt with by the relevant agencies and traffic calming measures can be implemented if necessary. Residents only parking schemes can assist in dealing with pressure for commuter parking. We note that the third KSR would identify any necessary improvements. Parking for residents within the new housing would obviously be a requirement unless exceptional circumstances are put forward, demonstrating that it is not required. We do not see any reason why anti-social behaviour in the wider area would be exacerbated by new housing on the objection site. In any event, this is a public order issue for the PSNI. We do not accept that a well designed housing development would adversely affect the quality of life of existing residents in the area.

It was argued that the site should be identified for social housing. Given its sustainable location, and our conclusions regarding the significant shortfall in social housing provision in the Plan, we see merit in this argument, provided that the planning history of the site does not preclude same. This will be for the Department to ascertain.

Recommendation

Subject to the caveat referred to above, we recommend that the site should be added to the list of social housing zonings.
**Zoning SB05/04 - Land at Hampton Park**  
(Objection 2334/4)

It was argued that part of the zoning lies within the Lagan Valley Regional Park. The objection referred to planning application Z/2003/1250/0 and stated that planning permission for residential development has only been approved within approximately half the land in the zoning; if BMAP permits housing development in the part of the site that lies within the Park then this would be in clear breach of the policies of the Lagan Valley Regional Park Local Plan 2005. It was submitted that the zoning should not be extended into the Regional Park and no housing development should be permitted on the banks of the River Lagan. The discrepancy between the BMAP text regarding the size of the zoning and the actual planning approval should be addressed.

Having examined the BUAP, the LVRP Local Plan, and BMAP, we conclude that the proposed housing zoning is outwith the LVRP and there is no proposal in BMAP to alter this. The objection is unfounded in this respect. The site does lie within the LVRP AONB, however, this is a matter outwith the scope of an area plan. We note that the size of the site was amended to 3.52 hectares in Plan Amendment No.1. We fail to see how the zoning could be described as lying on the river bank of the Lagan. We recommend no change to the Plan as a result of this objection.

**Zoning SB04/09 - Land at former North Rugby Club ground.**  
(Objection 3300/1 & 2)

The objection sought identification of the zoned land as a DOS, making provision for retailing on the site. We were not provided with any reasoning that would permit our further consideration of the issue. We note that a new social housing development is well underway on the site. As such, it would be inappropriate to identify the site as a DOS. We recommend no change to the Plan as a result of this objection.

**EAST BELFAST**

**Zoning EB03/02 and EB05/06 - 89 Holywood Road and 401 Holywood Road**  
(Objection 3825/69)

There is some confusion in relation to the objection. The original submission refers to zoning EB03/02 but quotes the address for zoning EB05/06. Zoning EB03/02 is located on Holywood Road, at its junction with Pomona Avenue. We note that the site has been redeveloped. EB05/06 is located adjacent to the junction of Holywood Road with Circular Road and contains disused Health Service buildings. NIHE sought zoning of the objection site for social housing. We have considered the general approach to social/affordable housing in part 1 of our report.

EB 05/06 is in a sustainable location on a main public transport route. We have identified a significant shortfall in social housing provision in the Plan. We see merit in the objection. However, there was no site-specific information to indicate the planning history of the site. There is also some confusion in respect of the address of the site that could introduce prejudice to the landowner. Given these circumstances, we
consider that it would be inappropriate to zone the site for social housing. We recommend no change to the Plan as a result of this objection.

**Zoning EB04/05 - Sandown Road**  
(Objection 2965/53)

The objection site is located to the south of properties on King’s Road. The route of the proposed EWAY lies immediately to the south. The objection, from BCC, was to the KSRs attached to the zoning. The site has been recently redeveloped. The Department has indicated that the KSRs are no longer necessary, since the conditions attached to the approval will ensure a satisfactory form of development. We agree with this analysis.

**Recommendation**

We recommend that the KSRs for the zoning are deleted from the Plan.

**Zoning EB04/06 – Lace Field, Cabin Hill. Also to proposed LLPA and SLNCI designations BT114 and BT102/11 and inclusion of site in AOCMD**  
(Objections 1124/1-3 and 7)

The objection was to the extent of the proposed LLPA, AOCMD, SLNCI and to the KSRs attached to the housing zoning. We were presented with no detailed reasoning in respect of the objections to the zoning, or LLPA. Our comments regarding the proposed AOCMDs are contained in part 1 of our report.

The objection posited that the proposed SLNCI designation can be supported in principle; however, there were three portions of the lands that should not be part of the designation and could be developed without detriment to same, by adopting appropriate KSRs.

The two northernmost areas identified by the objector are small in extent and appear, physically, to be integral parts of their surroundings. The larger, southernmost, area is grassland with trees around its perimeter. Notwithstanding the objector’s claims regarding the relative quality of lands within the proposed SLNCI, we consider that all three areas are likely to have significant nature conservation value, given their juxtaposition with the rest of the proposed designation. We note that the overlapping LLPA designation BT114 includes all three areas identified by the objector and that the LLPA is identified, inter alia, as an area of local nature conservation interest.

Following on from our conclusions in respect of policy ENV2, we reiterate that a SLNCI designation does not necessarily preclude development. Purely in respect of the SLNCI, should the objector’s arguments hold true, it would be possible to demonstrate that some form of development should be permitted in the areas identified. Given this, the designation would not prejudice any development potential the land might have and we therefore recommend no change to the Plan as a result of the objection.
Zoning EB05/01 - 484 Upper Newtownards Road  
(Objection 3076/1)

The site is located on the northern side of Upper Newtownards Road, between its junctions with Ormiston Drive and Ormiston Park. It was argued that the site should not be zoned for housing as SETT2 would preclude any land use, other than residential, on the site. It was submitted that, since the previous use of the site was commercial (a filling station/shop), and there was no housing permission on this site to justify the designation, the site should be identified for commercial development, mixed-use development or housing and should not be restricted to one particular use.

The previous uses on the site have ceased. It is now vacant. It is entirely valid for the Plan to determine what future use the site should be put to. Other than the description of the previous uses on the site, we have been presented with no reasoning as to why the housing zoning is inappropriate. This is an ideal location for residential development, adjacent to an Arterial Route and public transport routes. The site does not lie within an identified Shopping/Commercial Area. Given our conclusions on the shortfall of housing land in the Belfast City Council area, we consider that the housing zoning should be retained. We recommend no change to the Plan as a result of this objection.

Zoning EB05/05 - Land adjacent to Sydenham Primary School, Park Avenue and Strandburn Street  
(Objection 3825/68)

The site is an area of vacant land sandwiched between the Belfast – Bangor railway line and Sydenham Primary school. NIHE sought zoning of the site for social housing. We have considered the general approach to social/affordable housing in part 1 of our report.

The site is in a sustainable location close to a rail halt, Belfast Harbour Area and beside a primary school. We have identified a significant shortfall in social housing provision in the Plan. We see merit in the objection, provided that the planning history of the site does not preclude such a zoning. This will be for the Department to ascertain.

Recommendation

Subject to the caveat referred to above, we recommend that the site should add to the list of social housing zonings.

WEST BELFAST

WB 02/33 - Tudor Renewal Area & WB 05/11 - Lawnbrook Avenue  
(Objection 3645)

The objection sought the extension of the housing zonings into adjoining lands. WB 02/33 is now completed and so an addition to it would not be appropriate. The identified lands are partly in employment use and partly in residential use. We have no
evidence of the owners’ intentions and consider that in these circumstances a housing zoning should not be designated.

We do not understand what the objection to WB 05/11 is seeking when the objector states that it should be connected to the housing area at Centurion Street, which is on the opposite side of Lawnbrook Avenue to the zoning. We recommend no change to the Plan as a result of this objection.

**Zoning WB05/13 - New Barnsley Crescent, Whiterock Road**
(Objections 349, 356, 2258/111, 3106/17 & 3825/73)

The substance of most of the objections was that the site had been used for recreational purposes since the 1970s, although it had become somewhat derelict. The local community were in discussions with the landowner (Belfast City Council) to develop the land for recreation. Adjoining land was also given to the community by NIHE. These proposals were in jeopardy because of the housing zoning. This was an important site for access to the Belfast Hills. The Department acknowledged that the site was used for recreation and that there are deficiencies in open space provision in the wider area. However, the Department considered that the zoning should remain.

The site is not identified in the Plan’s open space audit (Technical Supplement 7). This audit does identify a shortfall of over 10 hectares in the Upper Springfield Ward. There is no remaining physical evidence of any existing recreational use on the site. There is a new building on the road frontage, which is used as a children’s day care centre. There is a boxing club in an older building next door (outside the zoning). The remainder of the zoning is flat and reasonably well-drained. We consider that the level of community support for recreational use means that the zoning should be reconsidered. The loss of a 2 hectares site from the housing allocation will not be significant in strategic terms. Its development for recreational use will address the shortfall in the area, which is an important consideration.

NIHE objected that the site should be zoned for social housing. We have considered the general approach to social/affordable housing in Part 1 of our report and we acknowledge the need for additional social housing provision. However, this does not outweigh our conclusion in respect of the site.

**Recommendation**

We recommend that Zoning WB 05/13 be deleted and the land zoned for open space/recreation.

**Zonings WB02/22, WB05/14 and WB05/16**
(Objections 610/23 & 24, 2258/100-102, 3106/11, 3819/7-9)
**Designation CA04/05 Belfast Hills Access Point, Lyndhurst View Park**

(Objection 953/4)

The objections related to the overlap between these zonings and designation BT102/05 - Belfast Hills Divis/Ligoniel SLNCI. The objectors indicated that this should be clarified or addressed in detail in the key site requirements for the zonings. Zoning WB02/22 has been built and WB05/14 has planning permission so the Department saw no merit in their inclusion within the SLNCI. The Department also indicated that the key site requirements for WB05/14 were no longer necessary. There was only a small overlap in the case of WB05/16 and this could be the subject of guidance in the key site requirements.

SLNCI BT102/05 is very extensive and the largest in the Plan area. The loss of the two housing zonings from its area will not be significant in terms of the overall SLNCI or the features of interest. We also note that zoning WB 05/14 is an open field with evidence of bonfires having been lit thereon. We agree that the key site requirements for WB 05/14 are no longer necessary. The reasons for the overlap remaining in the case of WB05/16 were not explained by the Department, other than that the overlap was small. The portion of the site in question comprises features of nature conservation interest such as woodland and is steeply sloping in part. However, we do not consider that this is so significant as to warrant SLNCI designation, given the small overlap in relation to the extensive nature of the overall SLNCI.

Objection 953/4 in respect of CA 04/04 was to its location in a private housing estate, which could cause access and signage difficulties. The access point is at the termination of a public road and adjacent to Zoning WB 05/14. Public access is therefore available and the Department can require provision for the access point when the housing zoning is developed. The objectors did not specify an alternative location or explain their concerns further. We consider that there should be no changes to the Plan as a result of this objection.

**Recommendations**

We recommend that:

- Housing Zonings WB02/22 and WB05/14 are removed from Designation BT102/05 - Belfast Hills Divis/Ligoniel SLNCI.
- The key site requirements for Zoning WB05/14 are deleted from the Plan.
- Designation BT102/05 - Belfast Hills Divis/Ligoniel SLNCI is removed from Zoning WB05/16.

**Zonings WB02/05, WB02/15, WB02/21, WB03/14, WB04/05 & WB05/07**

(Objection 3106/1 to 3106/6)

This objection related to the proximity of the zonings to the Colin Glen River and the negative effects of housing close to the river on a Salmon seeding programme and from possible flooding. Extensive buffer zones along the river banks were sought. No details of the size of the buffer zones were provided.
The dwellings have been built on the WB02 zonings and planning permission has been granted on zonings WB03/14 and WB04/04. There is therefore no possibility of accommodating the objectors’ suggestions for buffer zones on these sites. The comments of Rivers Agency regarding flooding issues are therefore a matter for the Department to address, as appropriate. We note that a portion of BT 101/ML 23 ULW runs along the river boundary with WB05/07. We do not consider that the absence of buffer zones in any of the other zonings should rule one out on this zoning, because it is the last zoning to the south and the ULW adjoins all of southern boundary of the zoning. No flooding issue was identified by Rivers Agency in respect of this zoning. We consider that the objection should succeed in respect of this zoning.

**Recommendation**

We recommend that Zoning WB05/07 should be amended to provide an appropriate buffer zone along the Colin Glen River, which should be incorporated into ULW Designation BT 101.

**Zoning WB03/20 - Somerdale Park, Ballygomartin Road**

(Objection 916)

The objection was to key site requirements for a 3-5m wide landscape buffer along the Northern and Western site boundaries and the boundaries of the site with Forthriver Primary School. The objection considered that boundary treatments should be decided after detailed assessment at the development management stage and consultation with appropriate bodies such as the school. We have addressed the issue of landscaping details as part of key site requirements and concluded that these are matters that can be addressed in the concept plan and at the detailed application stage.

**Recommendation**

We recommend that the key site requirements relating to the provision of 3-5 metre landscape buffers be deleted.

**Zoning WB 03/05 – 64 Andersonstown Road also to Designation BT 045 Fruithill Park ATC**

(Objection 2815)

This objection was to the zoning of the site for housing and its inclusion in ATC BT045. The basis for the objection was that the area is of a mixed commercial and residential character. The site had planning permission for a Retail/Apartment scheme, which would not accord with the proposed zoning and the design criteria for the ATC (as set out on page 239). The Department made no comment on the housing zoning and stated that if the planning permission had been implemented then there may be merit in excluding the site from the ATC, which is practicable in this case as it lies on the periphery of the designation.
We note that the building(s) on the site have been demolished and therefore the feature of interest contributing to the ATC has been lost. In these circumstances, we consider that the objection site should be removed from the ATC designation. The housing zoning does appear inappropriate in this area comprising of a mix of retail and residential uses. The site lies between a licensed premises and a parade of shops. The Department clearly recognised this in granting the planning permission on the site. We therefore recommend that the housing zoning should be deleted.

**Recommendation**

We recommend that the objection site be excluded from designation BT 045 and that Zoning WB 03/05 is deleted from the Plan.

**Objections to Housing Zoning WB04/08, Existing Employment Zoning BT011/29 and Designation BT102/19 – Ladybrook SLNCI: Lands at former Ford Visteon Plant, Blacks Road**
*(Objections 339, 844, 959, 2719 and 3124)*

Objection 2719 related to an area of land to the south of WB04/08 that was partly whiteland and partly within BT011/29 and sought extension of the housing zoning to include the site. The unzoned portion of the site was also within SLNCI 102/19. At the hearing the Department indicated that there was no objection to the extension of the housing zoning to include the site, provided that access to the remaining employment site was safeguarded. This access could be ensured by a key site requirement. NIEA confirmed that a large portion of the SLNCI as shown in the Plan did not merit designation because the important features were the stream and wooded gully along the northern part of WB04/08. In terms of objection 2719, the objector was content with the Department’s suggested approach.

We see no reason to disagree with the Department. There is no basis for departing from the expert opinion that the SLNCI should be reduced in size to protect only the features of interest. This also addresses objections 339 and 959, which sought clarification of the overlap between the SLNCI designation and the housing zoning because of the inherent incompatibility of the two. We consider that the housing zoning should be extended to include the 2719 objection site. We agree that the Department can formulate a key site requirement to address safeguarding access to the remaining employment site (considered further below).

Objections 339, 844 and 3124 were to zoning BT011/29 and sought variously that the site be zoned for housing or left as whiteland. The reason for the objections was the uncertainty of what would be permissible on the site and the obstacle that the zoning would be to re-development opportunities. The Department confirmed that planning permission had been granted for a mixed use residential and business park development on approximately half of the site. The Department recommended that the proposed zoning be removed from that portion of the site, but that it should remain on the balance. The site is surrounded by residential and other uses. The evidence that the site and buildings are unsuitable for modern industrial purposes was not refuted. The mixed use development that has been approved on the site will ensure that the use
for employment will continue. The employment zoning remaining after the Department’s concessions would be small and incongruous and surrounded by dwellings and a mixed use development. The two accesses to the site are within the approved site and therefore excluded by the Department’s concession. In all these circumstances, we consider that the site should be left unzoned and future proposals considered by the Department in that context. Given the mixed use approval on the site, a housing zoning would not be appropriate either.

**Recommendations**

We recommend that:

- Zoning WB04/08 should be extended to include objection site 2719: subject to a key site requirement safeguarding access to the remainder of the Visteon site.
- Designation BT102/19 – Ladybrook SLNCI be reduced in line with the attached plan entitled BT102/19 Revised SLNCI Boundaries.
- The remainder of Zoning BT011/29 should be deleted from the Plan and the area be left unzoned.

**Zoning WB 04/12 - Ballygomartin Road**

(Objection 2760/25)

This objection by Tesco highlighted a mapping error in that the access to their Ballygomartin store was included in the housing zoning and requested that this area be removed from the zoning. The Departmental statement of case did not address this issue, merely focussing on why the overall lands were zoned.

The basis for this objection is unclear. A zoning does not take away the landowners rights to dispose of their land. We consider that the existing traffic light controlled junction could possibly be used to serve this zoning. Just because the access is included in the zoning does not mean that it can be used without the owners consent. This would be a commercial matter between Tesco and a potential developer. There is at least one other potential access to the zoning. We consider that there is no planning basis for the objection and recommend no change to the Plan.

**Zoning WB 04/03 - Lands adjacent to Springfield Heights**

(Objection 3825/75)

NIHE objected that the site should be zoned for social housing. The Department stated that in making decisions on planning applications including those for social housing the Department will have regard to the Development Plan and all other material considerations. We have considered the general approach to social housing in Part 1 of our report and concluded that there is a shortfall. The site is in a suitable and accessible location and we consider that there is merit in the objection, provided that the planning history of the site does not preclude such a zoning. This will be for the Department to ascertain.
Recommendation

Subject to the caveat referred to above, we recommend that the site should add to the list of social housing zonings.

Zoning WB 05/17 - NE of Glencolin Cove, Glen Road
(Objection 984)

This objection stated that the zoning should follow the natural contours of the land and not extend too far up the slope. No further information was supplied and the Departmental statement of case did not address this, being the only issue of concern to the objector. We note that the site was zoned for housing development in BUAP. We also note that adjoining zoning WB02/34 (which is built) extends as far up the slope. Whilst we appreciate the objector's environmental concerns, there was insufficient information to enable us to identify the area to which the objector referred. We also consider that the previous zoning of the land, the adjoining built development and the draft Plan key site requirements for social housing on the site are determining in this case. We therefore recommend no change to the Plan as a result of this objection.

OBJECTIONS SEEKING ADDITIONAL HOUSING

NORTH BELFAST

Lack of housing zonings in Zoo area, including objection to inclusion of land in ULW BT098 and BT083 Belfast Zoo Historic Park Garden and Demesne
(Objections 2965/124, 3614)

The Plan refers to the history and development of Belfast Zoo. It became a public park in the 1920s and has been an important feature in the city since that time. We do not accept that the management of the Zoo is rendered so difficult by the designation that it should not be identified as a Historic Park Garden and Demesne.

The objection site lies outside the BT 083 designation as indicated on Plan Map 4/060, but inside the proposed BT 098 ULW. The Council stated its support for the principle of Urban Landscape Wedges but considered that the inclusion of the old zoo site is inappropriate since it is not critical in defining and retaining the identities of the Glengormley, Newtownabbey and the North Belfast area. It was also submitted that the site is not open in nature; it contains a range of buildings and disused animal enclosures with associated structures and paths.

We accept that there are a number of buildings and disused animal enclosures on the site; however, its general character is one of openness. Given its particular position, and its relationship with other ‘open’ lands at this location on the Antrim Road, we consider the site to be a critical element in the proposed ULW, which largely succeeds in creating a perception of separation between Belfast City and Metropolitan Newtownabbey.
The fact that the site may not have any current or proposed future recreational value, is not accessible to visitors, and does not form part of the public zoo, is unrelated to its function as landscape wedge and does not outweigh our conclusion. The future of the land is a matter for the Council but it would be logical if it were to be reincorporated into the Zoo complex for public use, as advocated by objection 3614. Whilst protection of nature conservation or features of biodiversity is one of the benefits of designating a ULW, we do not consider that this is a critical function, per se. We do not therefore accept the Council’s argument that key site requirements attached to a land use zoning, in order to promote these elements, would be of such benefit as to outweigh the need to retain an open landscape. Whilst the mature trees along the Antrim Road boundary may provide a degree of screening for future development, we consider that built development would still be perceptible in the landscape.

With regard to the Council’s comments in respect of environmental/sustainable/educational development on the site, we note that policy UE7 would not preclude proposals for outdoor recreational uses, subject to specified criteria being met. The existing buildings and structures, and the previous zoo use, are factors that will be material in the Department’s consideration of any planning proposal for the site. We recommend no change to the Plan as a result of this objection.

**Land at Ballysillan Road**
*(Objections 2965/146, 3645)*

This objection sought the identification for housing of a narrow strip of land running along the eastern side of Ballysillan Road. The land is currently part of a larger area of recreational/open space. Housing lies on the opposite side of the road.

We have commented on the issue of housing land supply in Part 1 of this report. The objector argued that the site would not represent a significant loss of open space, and would result in benefits in respect of boundary definition/passive supervision.

In our opinion, the objection site is clearly a peripheral, but integral, part of the adjacent open space. In terms of the issue of boundary definition, we consider that this already exists in the form of Ballysillan Road. With regard to informal supervision of the open space, we were presented with no information to suggest that there are particular problems in the area. We note that there is existing housing overlooking the open space from the opposite side of Ballysillan Road. In reality, we would anticipate more difficulties than benefits in the construction of housing on site of limited depth backing immediately onto public open space. We recommend no change to the Plan as a result of this objection.

**Land at Benview Estate, also to identification as open space**
*(Objection 3645)*

A large area of land adjacent to the Benview housing estate is identified as existing open space on map 4/001. The land is predominantly grassed and some tree planting has taken place. The area was obviously previously occupied by housing and the roads and footpaths remain in situ. There is clear evidence of anti-social behaviour on
these lands and they have an unkempt appearance. The site is surrounded by residential uses; a new private housing development is located in zoning NB02/24, to the north.

We have already concluded that there is a marked need for additional housing land in North Belfast. The value and function of this land as open space would appear to be very limited. We assume that the land is in the ownership of the NIHE; as such we consider that a housing zoning on the site would be warranted. Regional policy would ensure that an appropriate quantum of open space would be incorporated into the housing scheme. Taking into account the size of the site, it will be for the Department to determine if a KSR regarding provision of social housing is necessary, following consideration of our recommendations in respect of HOU2 and HOU3.

**Recommendation**

We recommend that the open space at Benview is zoned for housing.

**Sites at:-** Alliance Road; adjacent to Huttons Tiles (Shore Road); betweenzonings NB02/12 and NB02/27, part of Carrs Glen and Cavehill Country Park north and west of Kilcoole Gardens; north of zoning NB 03/18; adjacent to the Shore Road Playing Fields; Working Out Unit, Crumlin Road (Objection 3645)

We were provided with no maps showing the extent or exact locations of these objection sites. It would be inappropriate for us to consider zoning of land based on a written description, unless the site is clearly and unambiguously identifiable. Consequently we cannot consider these aspects of the objection further.

**Land at Limestone Road**

(Objection 3645)

This site is located on Limestone Road, between the Currie Primary School and Crosscollyer Street. It contains three commercial units, all of which appear to be operational. It was argued that these businesses, one of which is a locally unacceptable land use, should relocate and the site should be developed as affordable private sector housing to support the regeneration of the area.

We have no information as to the planning status of the commercial uses on the objection site. However, all seem to be well established. Presumably the businesses provide some element of employment for local residents. We have no indication regarding the intentions of the businesses or their views on relocating. Zoning the site for housing could have major implications for their future operations. Given the circumstances, we cannot concur with the objector's arguments, irrespective of the desirability of isolating housing from a commercial use that may cause a nuisance. In any event, we see no reason, in principle, why residential development would be unacceptable on the site if the existing businesses voluntarily relocated. We cannot support the objector's arguments and therefore recommend no change to the Plan after considering the points raised.
Play areas at Castleton Playground, North Queen Street and at Alloa Street/Cliftonville Park
(Objection 3645)

It was submitted that the play area at Castleton is currently under utilised and can be rendered redundant by the revitalisation of the adjacent Alexandra Park; it should be zoned for affordable housing. With regard to the play area at Alloa Street, it was argued that its zoning for housing would assist in the regeneration of the Oldpark area.

Our comments on the Plan’s stance on affordable housing are contained in part 1 of our report. At the time of our inspection both of these well-kept and well-equipped play areas were busy and are clearly assets used by the local community. We have no indication from BCC that it intends to close either play area or that they are redundant. We have no information regarding need for play provision in these localities, or the respective roles of the Castleton play area and Alexandra Park. Whilst there is a recognised need for additional housing in North Belfast, we do not consider that this should be provided at the expense of community facilities, unless they are demonstrably unnecessary. We therefore reject the objector’s submission. The desirability of regenerating the Oldpark area would not outweigh the need to protect play space. We recommend no change to the Plan as a result of the objection.

Land at Marmount Gardens
(Objections 3131, 3645, 3825/121)

The objection site is an area of overgrown/partially hard-surfaced land, with all but around 50% of the eastern boundary surrounded by dwellings.

The site is identified as existing open space on Map 4/001. The objection argued that the land has no identifiable purpose or function as open space and should not be identified thus in the Plan. It also sought identification of the site as housing land. The Housing Executive argued that part of the site should be zoned for social housing.

Our recommendations regarding identification of open space are contained in part 1 of this report, as are our conclusions on the quantum of housing land identified in Belfast City.

PPS8 policy OS1 would afford protection to existing open space whether or not it is identified as such in BMAP. However, it is for the development plan process to determine future land uses and it is therefore valid for us to consider the objector’s arguments in respect of the site’s status.

The southern part of the objection site contains the remnants of buildings and hard-surfaced areas. The northern part of the site, adjacent to Cliftonville Golf Course, is overgrown and more naturalised. We acknowledge the objector’s evidence regarding the previous use of the site as playing fields having been abandoned for 32 years, and the undisputed anti-social behaviour connected with the lands. We note the overgrown and unkempt condition of most of the site. We find it significant that the Department provided no convincing argument in respect of the site’s public value or function as open space, which need not necessarily involve direct public access. Neither were we
presented with any information as to the likely future use of the site. Given the
evidence before us, we are not convinced that the site should have been identified as
existing open space. We note the objectors’ submission that part of the site could be
allocated for social housing, which must weigh in favour of the zoning sought. Given
the site’s location close to amenities and a main bus route, we consider that a 50/50
split of private/social housing would be appropriate. We have not been made aware of
any impediments to housing development on the site.

**Recommendations**

We recommend that:-

- the open space identification on the site is deleted,
- the site is zoned for housing, and,
- a KSR is attached indicating that 50% of the site should be developed for social
  housing.

**Parkmount Day Centre, Shore Road**

(Objection 3645)

It was argued that the site occupied by the former Parkmount Day Centre should be
zoned for housing. This site has been cleared of buildings and is currently fenced off.
The site is currently being marketed for residential/commercial development ‘subject to
planning’.

Given the advertising signage in respect of the sale of the site, it would appear that an
element of commercial use may be sought or intended. We have no information
regarding the planning history of the site and in the circumstances we consider that it
would be inappropriate to zone the site for housing. We see no obstacle in principle to
residential development on the site, should a suitable proposal come forward. We
recommend no change to the Plan as a result of the objection.

**Site between Century Street and Wilton’s Funeral Parlour, Crumlin Road**

(Objection 3645)

The objection argued that the Crumlin Road frontage as described above should be
zoned for housing. The site contains a mix of occupied, unoccupied, and derelict
buildings and an ongoing development site. The occupied properties comprise a mix of
residential and commercial uses. BMAP map 4/002 indicates that the site contains an
existing shopping/commercial area and a small portion of existing employment/industry
zoning BT11/07.

We have no information as to the planning status of the occupied commercial premises
along this frontage. However, all seem to be well established. We have no indication
regarding the intentions of the land owners or businesses. Zoning the site for housing
could have major implications for their future operations. Given the circumstances, we
cannot agree with the objector’s submission, irrespective of the desirability of providing
additional housing in North Belfast. We recommend no change to the Plan as a result of this objection.

**Former Savoy Picture House Site, Crumlin Road**  
(Objection 3645)

This site is located at the junction of Crumlin Road with Tennent Street. It has been cleared of buildings and is fenced-off. We consider that the removal of buildings may be indicative of the owners intention to bring the site back into use.

There is an identified shortfall in the housing allocation for Belfast. We have no information regarding the planning history of the land. However, the site is in an accessible location and appears to be suitable for housing development. We consider that there is merit in the objection, provided that the planning history of the site does not preclude such a zoning. This will be for the Department to ascertain.

**Recommendation**

Subject to the caveat referred to above, we recommend that the site should be zoned for housing.

**Objection to lack of Social Housing Zoning - Land at Flax Street/Hillview Street**  
(Objection 3825/65)

The NIHE argued that the site known as ‘Prospect, Phase 2’, currently whiteland, should be zoned for housing to include both social and private.

We are unsure as to the exact location or extent of this site as no plan was submitted by the objector. Given this, we are unable to consider the matter further. In any event, the absence of a zoning would not preclude land being brought forward for housing. We note that vacant land between Flax Street and Hillview Road has recently been developed for housing. We recommend no change to the Plan as a result of this objection.

**Objection to lack of Social Housing Zoning - Land at the former Finniston School site, the adjacent open space at 271/315 Oldpark Road and the green area at Torrens Crescent**  
(Objection 3825/38)

The NIHE sought identification of three sites in the Torrens Crescent area for social housing. We note that two of the sites contain new residential development. Clearly, these areas need not be zoned.

The strip of land to the rear of dwellings on Wyndham Street is hard surfaced and appears to have had a recreational use at some stage. We are unsure if it remains in such use; in any event it is a small area, which could only have limited value in
recreational terms. We note that there are playing fields an other large areas of open space in the vicinity. This is a sustainable location for social housing, relatively close to amenities and public transport routes. An appropriately designed residential development on the plot would assist in addressing the shortfall of social housing in the north part of Belfast. We consider the zoning to be justified.

Recommendation

We recommend that the remaining undeveloped part of the objection site is zoned for social housing.

Site at the entrance to Ligoniel Estate, located at the junction of Ligoniel Road/Mountainhill Road. Objections to lack of Social Housing Zoning
(Objections 2855/12 and 3825/58)

This is a relatively steeply sloping area of fenced-off open space that has been hard-surfaced. The NIHE sought zoning of the site for social housing and the Ligoniel Improvement association sought its formal identification as open space. The latter argued that the site is in private ownership, has lain undeveloped despite the grant of planning permission, and is an eyesore in the community.

We were not advised of any proposal to improve the site and/or bring it into public use as amenity space. In the absence of any commitment for its development by BCC (the statutory provider of public open space), or any other party, there is no guarantee of an improvement in its appearance. It is not currently open space and it would be inappropriate to identify it as such in the Plan.

On the basis of the information before us, there is clearly a planning history relating to the site, although we are unsure as to the approved land use or current status of the consent. We have acknowledged the identified need for additional social housing provision in Belfast. The site is in an accessible location, appears to be suitable for housing development, and we consider that there is merit in the NIHE objection, provided that the planning history of the site does not preclude such a zoning. This will be for the Department to ascertain.

Recommendation

Subject to the caveat referred to above, we recommend that the site should be zoned for social housing.

SOUTH BELFAST

Land at McClure Street
(Objections 2965/122 and 3825/122)

Objection 2965/122 sought that the open space identified to the north side of McClure Street should be identified as land available for housing to reflect the surplus status of
the site and the process of disposal. Objection 3825/122 sought zoning of the identified open space as social housing.

A narrow strip of open space separates the dwellings in Powerscourt Place, on the southern side of McClure Street, from the road. The proximity of the open space to the frontages of the dwellings would preclude its development for housing.

The strip of mainly grassed open space between the road and the parallel railway line is around 15m deep. Whilst it would be physically feasible to develop this land for housing, this would result in the loss of an attractive area of open space, which in our opinion is important to the character of the area. We have concluded that there is a need for additional housing land to be identified, particularly for social housing, but this should not be to the detriment of important townscape. Whether or not it is regarded by Belfast City Council as surplus land, we consider that this area of open space should be retained. We recommend no change to the Plan as a result of these objections.

**Land at Monarch Street**
(Objection 2010/1)

The site is bounded by Monarch Street, Donegall Road and the Westlink. The site has been cleared and is vacant; it is overgrown with shrubs and weeds in parts. The land is enclosed by fencing on all sides. Terraced housing lies immediately to the east on Monarch Street and there are buildings in mixed uses to the west on Donegall Road, the Westlink lies immediately to the north. It was submitted that the site should be zoned for housing development.

Given our conclusions on the shortfall of housing land in Belfast City, we would disagree with the Department’s stance that there is no justification for the site to be zoned as suitable for housing. We have not been made aware of any impediment to residential development on the site.

It will be particularly important to mitigate against noise from the adjacent Westlink; the design process could adequately address this matter, together with other details such as access and drainage. Taking into account the size of the site, it will be for the Department to determine if a KSR regarding provision of an element of social housing is necessary, following consideration of our recommendations in respect of HOU 2 and HOU3.

**Recommendation**

We recommend that the site is zoned for housing.

**Land at RUAS, Harberton Park**
(Objection 2764/1)

This substantial objection site comprises an open grassed arena, car parking and buildings in the southern part of the RUAS lands. Existing residential development lies to the east in Harberton Park. Balmoral Golf Course lies to the south and west. The
objection argued that the lands should be zoned for housing. The evidence indicated that an outline planning application had been submitted to the Department. The plan submitted with the objection indicates a layout providing 140 residential units.

It was submitted that designation of the lands would increase housing choice, and make efficient use of land within the existing development limit. A quality, sustainable, development would be achieved; the site is served by excellent public transport links and there are no impediments to development.

We are unaware as to the outcome of the planning application referred to by the objector. Given our conclusions on the shortfall of housing land in Belfast City, we consider that there is justification for the site to be zoned for housing. We received no submission disputing the objector’s claims regarding the suitability of the site for housing development. This is a relatively large site and it will be for the Department to determine if a KSR regarding provision of an element of social housing is necessary, following consideration of our recommendations in respect of HOU 2 and HOU3.

**Recommendation**

We recommend that the site is zoned for housing.

**Objection to open space designation seeking housing zoning Bladon Park - RBAI playing fields (also to proposed SLNCI BT102/09 and proposed LLPA BT121)** (Objection 244)

The evidence before us is that planning approval has been granted for housing on the objection site. The Department has stated its opinion that the SLNCI and LLPA designations affecting the objection site should be deleted. We concur with this. As consent has already been granted we see no specific need for the lands to be zoned for housing in the Plan and disagree with the objector’s argument on that point. An amendment to the area identified as open space would clearly be required.

**Recommendation**

We recommend that the boundaries of the SLNCI and LLPA designations, and the area identified as existing open space, should be amended to exclude the objection site.

**EAST BELFAST**

**Land at Ormonde Gardens (seeking extension of zoning EB03/21). Also objection to non-identification as a DOS (primarily housing/commercial)** (Objection 3335)

The site is located off Ormonde Gardens with a pedestrian access to Ladas Drive. A new development of townhouses and apartments lies to the north in the lands zoned as EB 03/21. The objector submitted that a planning application for residential development on the site had been submitted and that the Department was content with
the principle of residential use; there was therefore no issue regarding the safeguarding of the existing office building. At the time of inspection, the site contained an operational 2 storey block of offices.

The site is unzoned in the draft Plan. There is no evidence before us that there would be an impediment, in principle, to its redevelopment for housing. Given this, the development management system would determine the matter raised in the objection and there is no need for the zoning sought. We recommend no change to the Plan as a result of this objection.

Objection 3207
Our conclusions on the identification of DOSs are laid out in part 1 of this report. Given that the site is occupied by an existing business, it could not be described as vacant or under-utilised land. It would not, therefore, be appropriate to identify a DOS at this location and we recommend no change to the Plan as a result of this objection.

Land at Holywood Arches
(Objection 3713)

The site comprises of a strip of derelict land running along the northern side of the Conn’s Water. It is bounded to the north by zoning EB 02/38, which has been fully developed and contains a new private housing estate. The northern boundary is open; the other boundary is defined by palisade fencing.

We have considered the objections to the BT013/01 Connsbank Link and the BT013/02 Holywood Arches Bypass and concluded that most of the latter should be deleted from the Plan. Retention of the former scheme would not involve land within the objection site; as such, there would be no impediment to its development for housing. We note that access to the objection site has been incorporated into the new housing development. We fail to see how flooding could be an issue, given that the site levels are identical to those in the adjacent housing estate.

Recommendation

We recommend that the site is zoned for housing.

Land at Finchley Vale/Motelands/Garnerville Drive
(Objection 3214/2)

This objection sought the zoning for housing of two parcels of land; (i) an elongated site in grass to the east of the undeveloped zoning EB05/07, which is bounded by Garnerville PSNI centre to the north and existing housing to the south and west, and (ii) a small area to the rear of a recently refurbished apartment development at Motelands.

Given the identified need for additional housing land in Belfast City, we do not accept the Department’s submission that there is no justification for zoning further sites.
The larger of the subject sites is physically connected to an existing zoning and we have been presented with no convincing reasoning as to why it would be unsuitable, in principle, for housing. Roads Service has indicated that access may (our emphasis) be problematic. However, we fail to see how the small number of dwellings that is likely to be accommodated could not be accessed through Motelands and/or Finchley Vale, via zoning EB05/07.

The smaller site is closely related to the building to the immediate north and it would not be appropriate to zone it as a discrete entity. Part of the objection site would appear to be incorporated into the curtilage/garden space related to the apartment block. It would not be appropriate to specifically identify this as housing land. The remainder could be incorporated into the EB03/19 zoning.

**Recommendation**

We recommend that the area to the east of zoning EB05/07 should be zoned for housing. The portion of the smaller site outside the curtilage of the apartments at Motelands should be incorporated into zoning EB03/19.

**Objection to non-identification as a DOS (primarily housing) - Palmerston Road**

(Objection 3372/1)

The objection site is located immediately to the southeast of Strandburn Parade. It comprises a steeply sloping ‘L’ shaped area, which wraps around the rear of the adjacent terraced dwellings. The site contains an attractive stand of semi-mature trees.

The objector sought identification of the site as a DOS, mainly for housing. We were presented with no arguments in support of the objection. Our conclusions on the identification of DOSs are set out in part 1 of our report. We do not consider that the site falls within the category of vacant or underused land. Rather, it is an attractive incidental area of treed open space, which lends character to the locality. We consider that the physical nature of the site would render its development for housing challenging and that residential development on the site would compromise the environmental quality of the area. We do not, therefore, consider that the Plan should be changed as a result of this objection.

**Lack of Social Housing/Mixed Use Zoning at Harland Walk, 74-98 Newtownards Road**

(NIHE Objection 3825/124)

The site is located on the northern side of Ballymacarrett playground on the Newtownards Road. We note the site has already been developed for social housing. We recommend no change to the Plan as a result of this objection.
Lack of Social Housing Zoning at the former Glenluce Sheltered Scheme adjacent to Lands at Laird House, Knocknagoney. Also to proposed LLPA BT 132 (NIHE Objection 3825/123)

NIHE objection 3825 sought zoning of land to the eastern side of Glenluce Walk for social housing and exclusion of the site from the Knocknagoney LLPA.

The site is physically discrete and separate from the main part of the proposed LLPA. It does not appear to be part of the area containing the features listed in the Plan as justification for the designation. We note that, apart from a small landscaped ‘island’, new housing now occupies the site. We have not been presented with any information from the Department as to why the site should be included within the proposed LLPA. We consider that the site should be excluded from same. Given that the land has been developed, it would clearly be inappropriate to zone it for social housing.

Recommendation

We recommend that the area of new housing on the eastern side of Glenluce walk should be excluded from the LLPA BT132.

WEST BELFAST

Car park, Northumberland Street (Objection 3645)

This objection states that the land has been identified by the NIHE for housing development. The car park is in use and serves the Shankill Road. NIHE did not provide any information or make any objection in relation to the site. As the site is in beneficial use and we have no confirmation from NIHE of its intentions, we consider that there should be no change to the Plan.

Land south of Paisley Park and adjacent to Springfield Parade (Objection 3645)

This is an area of unzoned land in the Plan. It appears to be rough grassland that is fenced off at the moment and has no beneficial use. The site is in a good location and adjacent to community facilities (such as the Springfield Primary School immediately to the south). We consider that the Department should investigate the possibility of zoning the site for housing, given the shortage that we have identified.

Recommendation

We recommend that the Department investigates the possibility of zoning the site for housing.
Land at Ballygomartin Road
(Objection 3645)

The identified lands are around Springhill Primary School and are bounded by Zonings WB 05/16, WB 04/11 and BT 011/34. Part of the site is identified as open space in the Plan. This part of the site appears to be disused playing fields and a disused tennis court. The site is fenced off from the road and school. There appears to be no access from the new housing to the north. The land is unkempt and disused and appears to have little value as open space. We have no information on the long term plans for this land. We note that housing development is under construction on part of the site to the SW of the Primary School. The land to the NE of the Primary School is overgrown and could be suitable for housing. We consider that the Department should evaluate the suitability of the site for housing, including the area identified in the Plan as open space.

Recommendation

We recommend that the Department investigates the possibility of zoning the site for housing.

Former Mount Gilbert Community College
(Objection 3645)

This site has been cleared and levelled into two terraces. The objector indicates that the Belfast Education and Library Board intend to sell at least part of the site for housing development. This is a substantial site surrounded by existing housing and would be suitable for housing development. We have no information from the land owner as to its intentions. We therefore recommend that the Department investigates the planning history of the site with a view to zoning it for housing.

Recommendation

We recommend that the Department investigates the possibility of zoning the site for housing.

Lands at Beechmount Avenue
(Objection 3825)

The Department indicted that NIHE had sought a social housing zoning on the above lands. We have examined the objection and cannot discover any such issue therein.

Lands at Glencairn
(Objection 3645)

The objection refers to 3 pieces of land off Forthriver Road that may be identified in the Plan as open space. There were no plans attached with the objection and so we can only comment in general terms. The first portion of land was identified as between Glencairn Day Care Centre and Forthriver Crescent. Part of these lands around the day care centre is indicated as open space in the Plan. Sheltered housing has been
constructed on lands to the south. It appears that some development could be achieved on this extensive area given that part of it is unzoned and the remainder is grassland in terraces. The Department should investigate a zoning for social housing on some of this land.

The second area of land lies to either side of the Belfast City Mission. This land is indicated as open space and is level with the road before sloping down to the rear in places. Again there may be limited scope for some social housing on the level part of the site, given the extensive open space in this estate.

The third area of land appears to be south of Forthriver Drive. This open space contains an equipped playground and a football pitch and should be retained. There is an area of unzoned land to the south next to St. Andrew’s Church, which appears to have been the site of a building. The Department could investigate a potential social housing zoning on this land.

**Recommendation**

We recommend that the Department investigates the possibility of zoning the lands identified above for social housing.

**Lands at Blackmountain Way, Springmartin Road**  
(Objection 2291)

The objection identifies land shown as open space in the Blackmountain estate. The objector claims that the land was formerly occupied by housing and local people have plans for its re-development including a village centre, housing and open space. The site is identified, and is in use, as open space. At the time of our visit it was the site for a large bonfire. We recommend no change to the Plan unless the planning history of the site dictates otherwise.

**Lands at Agnes Street/Malvern Street**  
(Objection 3645)

The objection wrongly claims that land has been zoned for open space in this area. The objection seeks that lands be zoned for housing to reflect NIHE proposals for the regeneration of the estate. No specific lands have been identified. We have no information as to the intentions of NIHE. We have no information as to the value of these lands to the community as open space. Again we would state that its loss to development is irreversible. In these circumstances, we recommend no change to the Plan as a result of the objection.
OBJECTIONS SEEKING OTHER ZONINGS, INCLUDING DEVELOPMENT OPPORTUNITY SITES

**Tudor Lodge, Shore Road**
(Objection 3645)

The objection site is currently occupied by a vacant derelict public house, with ongoing commercial uses to the rear and side. The objection sought a mixed use zoning.

We are unaware of the planning history of the site, or the intentions of the land owner. The status of the existing commercial uses on the site is also unclear. The objector has not explained what is meant by ‘mixed use’, nor provided any detailed argument for our perusal. In the circumstances, it would be inappropriate for us to give further consideration to the objection.

**Objection to non-identification as a DOS - University Street/Essex Street**
(Objection 859/1)

The site comprises a number of properties between Nos. 108 and 132 University Street; there is a mix of residential and commercial uses, and a hall, with several buildings lying vacant. The site includes a vacant shop on Ormeau Road and a cleared site adjacent. Various backlands and buildings are also included, one containing a bar/nightclub. Some premises within the site are in poor or semi-derelict condition.

The objection sought identification of the site as a DOS in order to “promote a mix of new uses, promote the vitality and viability of the area and enhance the townscape”. However, no indication was provided as to what land uses were proposed.

There is no doubt that parts of this site are vacant or underutilised. Other buildings are, however, occupied. Redevelopment of the site as a whole, or in part, could result in environmental improvement and urban regeneration. Notwithstanding this, we have concluded in Part 1 of our report that DOS should only be identified in strategic and important locations outside the City Centre. We do not consider that this is such a location and recommend no change to the Plan.

**Objection to non-identification of Development Opportunity Sites - Ormeau area**
(Objection 1424/4)

It was argued that a number of sites in the wider Ormeau neighbourhood constitute development opportunities that residents are concerned should be taken up by imaginative, sensitive and responsible developers:

(a) the site of the former Curzon cinema;
(b) the Ormeau Bakery building, which forms such an important part of our local heritage. It was argued that the building should be afforded a protected status;
(c) the Park Keeper's House in the Ormeau Park. Designs for the transformation of the derelict building into an Eco-House, produced by IASTE students in 2001 could be implemented; and,
(d) the site of the old Holy Rosary Church on the Ormeau Road.

No specific land use proposals were presented to us. We note that sites (a), (b), and (c) have been redeveloped or refurbished. The Holy Rosary church is currently for sale as a site for potential redevelopment; clearly, a proactive approach to its reuse is already being taken and we therefore see no need for the Plan to identify it as a DOS. We recommend no change to the Plan as a result of this objection.

**WBP Objection to non-identification of sites in West Belfast as DOS**

*(Objection 2258/95)*

**St. Comgall’s School**

The objectors state that the site has been acquired by the Falls Community Council. The building appears to be vacant and artwork has been provided to the boards covering the windows. It presents a poor appearance of dereliction and vandalism at the moment. The intention is to develop a “must see” visitor attraction in the building and bring it back into use. The proposal is for the building to accommodate a tourism related development. We considered the issue of DOS where tourism projects are involved in Part 1 of our report and concluded that they should not be designated in the absence of definite proposals. There are no definite proposals in this case and a designation for such use could have the effect of preventing development on this important site. There is nothing to prevent the proposal coming forward for consideration as part of the development management process. We recommend no change to the Plan.

**Gaeltacht Quarter**

The quarter is indicated on Map 2 attached to the original objection. This map indicates several sites in a schematic way. There is insufficient information to identify which sites are being proposed other than the ones we shall consider either as DOS or Gateways. We must therefore turn to the objectors’ evidence to ascertain their intentions in submitting the objection. The emphasis is on the creation and fostering of a new city quarter based on the Irish language. This would reap benefits in terms of regeneration and economic development, it was claimed. The area has been the subject of policies aimed at supporting regeneration and renewal, such as the designation of Arterial Routes and the accompanying commercial nodes etc. The Department has also indicated a more flexible approach to uses on employment sites and supported mixed use developments. The Plan contains little guidance or policy in terms of the issues identified in the objector’s submissions on other city quarters, the exception being Titanic Quarter. This is a completely different situation as Titanic Quarter was a blank canvas earmarked for significant new development. West Belfast is a long established area with differing characteristics. We are unsure as to what changes to the Plan the objectors are proposing, if any. We have indicated in paragraph 12.1.5 of Part 1 of our report that the Department may wish to refer to other city quarters in the explanatory text to the Plan’s Tourism Strategy. There are no sites for us to consider for
designation as DOS under this heading and we recommend no change to the Plan. We considered the issue of DOS where tourism projects should be accommodated in Part 1 of our report and concluded that they should not be designated in the absence of definite proposals.

Conway Mill

This site was not included in the original objection and we cannot consider it further for that reason. We note that the mill building has been refurbished and is in use for a wide range of uses. It would not therefore be appropriate for such a designation anyway.

Former Police Station, Andersonstown Road

The site lies at the junction of the Andersonstown, Falls and Glen Roads and has been cleared and surfaced. The site is in a Commercial Node in the Plan, which we have recommended should be deleted as there is insufficient commercial activity at the moment. The objectors’ proposals for the site included a hotel and apartment development as a funding source. We considered the issue of DOS where tourism projects should be accommodated in Part 1 of our report and concluded that they should not be designated in the absence of definite proposals. There are no definite proposals in this case and a designation for such use could have the effect of preventing development on this important site. Proposals for tourism projects and residential development can come forward on sites within the built-up area and designation as a DOS would make little difference to this outcome. We recommend no change to the Plan as a result of this objection.

Objection to the non-designation of the Holylands as a Protected City Centre Housing Area

It was argued that the Holylands meet the criteria under policy HOU5 for designation as a Protected City Centre Housing Area, so that family homes can be protected from proposals for change of use.

We note that policy HOU5 does not list any criteria for designation of Protected Housing areas. The policy seeks to designate these only in relation to residential areas in town and city centres in order to prevent changes to commercial uses. Since the Holylands is outside Belfast City Centre, it would be inappropriate for such a designation to be applied. It would appear that the major concern of the objector is to prevent the spread of HMO. HOU5 is not intended to address this issue, which is dealt with by the HMO Subject Plan. We recommend no change to BMAP as a result of the objection.

Objection to non-identification of Gateways outside Belfast City Centre (Objection 2258/94)

Gateways to the City Centre are listed as main elements of the conceptual spatial framework in the Belfast City Centre Strategy. 11 locations are identified on p. 21 and Diagram 1 of the Belfast Volume (including the three City Centre locations referred to in the objection). The Planning Actions on p. 23 refer to the gateway locations being
included in the City Centre Character Areas. The Plan defines these Gateways on Map 2/001. The Character Area Designations merely impose building height restrictions and do not address the issues of these Gateways being inappropriately developed or undeveloped or presenting a poor entrance to the City Centre that were raised in Volume 1 of the Plan. We consider that the Plan could do more to facilitate appropriate development at these locations. This matter could be addressed as part of the re-consideration of DOS that we recommended in Part 1 of our report. The objection seeks environmental improvements at three Gateway locations to the west of the City Centre. This is a development plan concerned with the proper land use planning for the area. Regeneration initiatives are the responsibility of another Department and other bodies and are therefore outwith the scope of this Plan. This is also the situation with the identified problems with Castle Street extending into the Falls Road, which was identified as a potential mini-Laganside.

The Plan only designates Gateways within the City Centre. Some limits must be imposed on the Plan Designations or every approach to the city could be a gateway and arguments regarding their location would be rife. We consider that restricting them to the City Centre is a valid approach. We shall comment briefly on the objectors’ suggested locations below.

The Westlink has been upgraded and the Broadway junction has been improved by means of an underpass. Pedestrian links have been improved. A major public art installation has recently been provided at Broadway. It therefore appears that the objectors’ requirements have been realised. Our comments above on environmental improvements would equally apply to the suggested location at Kennedy Way. We do not consider that this is a gateway either; it is a radial link as stated in the objectors’ submissions. Belfast International Airport is a Regional Gateway for the whole region and not just West Belfast. We have addressed the issue of signage in Part 1 of our report. The transport linkage improvements are not identified in the statement of case and in any event, this issue was not in the original objection. The roads identified as gateways in the objection are simply some routes to the airport from West Belfast and not gateways to the city. We have addressed environmental improvements above. The Colin Urban Zone was not in the original objection and so these submissions cannot be considered further.

**Failure to identify Holywood Arches as a Key Location in East Belfast**

(Objection 1803/7)

This objection sought recognition in the Plan for the uniqueness of the position of the Holywood Arches area. It was argued that this commercial area has suffered from considerable decline as a consequence of previous planning decisions. The objection submitted that the retention in the Plan of the Holywood Arches By-Pass/Connsbank Link, as a non-strategic road scheme is destined to ensure that the existing blight would continue.

We have concluded that the Holywood Arches bypass should be deleted from the Plan. If anything, the Connsbank Link would reduce pressure on the local road network, thereby creating a more pleasant environment in the vicinity of the Holywood Arches. A
District Centre has been identified at Connswater and Arterial Routes are identified on all of the main roads through the area with a Commercial Node (AR 03/13) at the junction of the Albertbridge/Newtownards/Upper Newtownards/Holywood Roads. We consider that BMAP already recognises the importance of the area and, in the absence of any specific suggestions from the objector; we recommend no change to the Plan.

EMPLOYMENT

EMPLOYMENT ZONINGS

BT007 - Land at Monagh By-Pass (Glenmona): also objections to Housing Zoning WB03/19

(Objections 902 & 4246, 1866/17, 2258/82 & /113, 3824/1 & 4225/3, 3825/33, 50 and 54, 2965/113, 114 and 105)

Plan Zoning BT007 is for employment purposes and includes the provision of 4 hectares for a new school. WB03/19 is an adjoining housing zoning that is in the same ownership and should logically be considered with the BT007 zoning. There were also objections to other matters relating to the site, which we will consider below.

There was broad agreement that the zoning should be changed to a mixed use one. The objectors including the owners of the site, WBP and NIHE sought an urban village approach to this large important site. The Department agreed on the basis that there was sufficient employment land elsewhere in West Belfast and because of the critical social housing need in the area. DSD had indicated that the wider regeneration benefits of a mixed scheme justified an amended zoning. They argued however that some employment uses must be accommodated on the site. Invest Northern Ireland agreed with this assessment and indicated that other sites were capable of meeting the strategic needs of the area. The principle of a mixed use development covered by a masterplan was endorsed by all and we see no reason to disagree with this conclusion. The only matters of debate therefore were the key site requirements that should apply.

The Department tabled a revised zoning (including key site requirements) to the inquiry. This document will form the basis of our consideration. There seemed to be broad consensus on the proposed key site requirements, with some areas of discussion to be clarified. There was some debate about the provision of social housing on the site. The Department’s key site requirement stated that “A minimum of 50% affordable housing shall be provided comprising a social housing component at a proportional level to be agreed with the Department”. NIHE wanted this proportion to be agreed with them and the numbers of social dwellings to be specified. The agreement of the Department is all that can be required in planning stipulations. We have concluded in Part 1 of our report that affordable housing cannot be secured in the BMAP area in the absence of regional policy. The key site requirement as drafted is not appropriate and it should be revised to refer to social housing only. The proportion of dwellings for social housing should be specified by the Department in the key site requirement.
There was some discussion of allowing an appropriate level of offices on the site in order to meet the needs of an urban village. This was endorsed by almost all the objectors. The Department suggested a compromise whereby favourable consideration would be given to a proposal coming forward in the masterplan for a single shopping/commercial area (as designated elsewhere on Arterial Routes) at a location and of a scale to be agreed with the Department. This was considered to be an attempt to meet a local need for these facilities. In assessing this suggestion we take into account the fact that this is a large site with a clear future vision as an urban village. A mixed use development is envisaged. There is an adjoining housing zoning. In these circumstances the provision of a shopping/commercial area would be appropriate. We note that an urban village core was supported by DSD in their comments recommending revision of the zoning to a mixed use one. We recommend that the Department considers whether office use needs to be added to the list of acceptable uses, and the extent of same, in the same way as local retailing has been included. There were no objections to any of the other suggested acceptable uses. The Department agreed to a minor amendment to the wording of the key site requirement related to the provision of a new school; changing the wording from new school to new educational facilities/campus.

There was a suggestion that access to the Belfast Hills should be included as part of the proposal. The Department indicated that this was not necessary because there was a designated Access Point outside the site (CA04/02). We agree with this assessment and consider that any further community initiatives related to access to the Belfast Hills can be brought forward as part of the masterplan process.

The issue in respect of highways key site requirements was the fact that the two zonings had been tied together and that only one access onto Monagh By-Pass would be permissible because of its status as a protected route (Policy AMP3 of PPS3 applies). The objectors claimed that this is not explicitly stated in the Plan. However, the key site requirements for WB03/19 do refer to a combined access for both zonings. The objectors argued that the results of a transport assessment indicated that one access would be insufficient to accommodate the development of the site. Two accesses would be required and would enable better public transport services. The existing access off the Glen Road would principally be for pedestrian and cyclists. Roads Service indicated that if a second access were required then Upper Springfield Road could be used. The objectors highlighted difficulties with that route in terms of gradients and road alignment. They also referred to difficulties in segregating commercial and residential traffic with only one access. We agree with the Department that traffic can be segregated close to the access and so this is not a critical issue. We consider that there is sufficient doubt in this case to justify removal of the combined access from the list of improvements in the transport assessment key site requirement. Firstly, a combined access is not an improvement to the highway network. Secondly Policy AMP3 on access to a protected route allows for any exceptional circumstances to be considered and not simply where a proposal is of regional significance. We consider that the key site requirement as framed is pre-judging the issue and the Department needs to make an assessment of the benefits of the scheme versus the strict application of policy in the context of full information as provided by the TA. The status of Monagh By-Pass in terms of the abandonment of a western ring road for the city by Roads Service in the BUAP would no doubt be taken into account. We therefore conclude that the stipulation should be removed from the key site requirements and the
matter left to the transport assessment process, which must be approved by the Department.

We consider that it would be sensible to consider combining the two adjoining zonings into one. The key site requirements for the overall site could then reflect a more comprehensive approach. This would also address objections to WB03/19 related to the key site requirement to provide a landscape belt to all boundaries. This landscape belt would appear to run counter to integrating the two sites and providing linkages and access between them. It would create an artificial barrier between the two, which is unnecessary in the context of a mixed use zoning for BT007. There was another objection related to the zoning of WB03/19 as social housing zoning WB06/25 by NIHE which we have already considered under Hannahstown Hill lands.

Belfast City Council suggested that WB03/19 and a small part of BT007 should be considered for designation as a SLNCI (map provided). The evidence on this issue was somewhat contradictory. The Department indicated that while the site merited designation, this was not recommended because of the zoning of the land for development. The landowners (counter-objectors) stated that the results of their ecological study indicated that there were no habitats of significance on the site. They pointed out that in the Department’s consultation replies NIEA had no comment to make. The masterplan for the site retains the key vegetation on the site and a linear park is proposed.

We are somewhat surprised at the Natural Heritage change of stance in their two consultation replies. The habitats that they indicate as important on the site would not appear to be unique in the context of the Belfast Hills. We note that the very large Belfast Hills – Divis/Ligoniel SLNCI does not extend to the site or development limit in this area, unlike in other parts of the city. The Department’s overall assessment is that the designation of a SLNCI is not justified. The original objection gave no information as to why the site should be designated. The counter-objectors give us evidence of a low nature conservation interest on the site. The conflict of evidence and the Department’s response leads us to conclude that the wider benefits of the zonings outweigh what is in effect a perceived nature conservation interest. The masterplan can seek the retention of the important vegetation as stated by the counter-objectors (the landowners). We therefore recommend no change to the Plan as a result of these objections.

**Recommendations**

We recommend that:

- Zoning BT007 is changed to a mixed use zoning, primarily for employment and housing, and includes housing zoning WB03/19 within its boundaries.
- The Department considers whether an appropriate level of offices needs to be added to the list of acceptable uses.
- The key site requirements are as tabled by the Department to the inquiry subject to the following amendments:
An additional key site requirement is inserted as follows: “Favourable
consideration would be given to a proposal coming forward in the masterplan
for a single shopping/commercial area (as designated elsewhere on Arterial
Routes) at a location and of a scale to be agreed with the Department”.

O The wording of the key site requirement related to the provision of a new
school be changed from “new school” to “new educational facilities/campus”.

O The wording of the key site requirement related to the provision of affordable
housing is changed to refer to social housing and that the proportion of social
housing is specified.

O The stipulation “A combined access to the site in conjunction with the
proposed housing zoning WB03/19” is removed from the transport
assessment key site requirement.

Zonings BT 008 & BT 011/05 - Castlereagh Road

Objections 3149 & 2856 - Castlereagh Road

The Department agreed with the objector that zoning BT 008 should no longer be
zoned for employment use in the Plan because the site has planning permission for
residential development. Part of zoning BT 11/05 was included in the objection site
(i.e. the frontage to Castlereagh Road) because it also has planning permission for
residential development. The Department considered that site should be withdrawn
from the employment zoning also. They did not state for what purpose the site should
be zoned: presumably they intend it to be unzoned. The Department did not refer to the
Rivers Agency consultation on the site, as presumably their concerns can be addressed
by conditions on any planning permission granted for the site.

The objectors in the case of objection 3149 point out that the site also has planning
permission for a supermarket (3700 m2) and request in their statement of case that the
be zoned as a DOS for residential/retail purposes. The original objection was simply to
the zoning for employment. We cannot extend the scope of the objection and so cannot
endorse zoning as a DOS. If the zoning is removed and the site left unzoned then the
objection will be overcome. In any case, when we take our conclusions on Policy SETT
5 into account, this is not a strategic location outside the City Centre where a
designation as a DOS would be appropriate. Objection 2856 states that the site is
suitable for a number of uses including retail. This is not sufficient to decipher what the
objection hoped to achieve. No further information was provided as to what the
objection sought other than that it was to zoning BT 008, which has been discussed
above.

Recommendation

We recommend that Zoning BT 008 and that part of zoning BT 011/05 within objection
site 3149 be deleted from the Plan.

Objection 2792 - Factory at 36 Orby Road

This objection sought that uses from Use Class B1, B2, B3 and B4 be allowed on the
site. The Department has confirmed that most uses within these classes would be
acceptable on employment sites (see the Employment section in Part 1 of this report) and therefore the objection has been resolved.

Zoning BT 009 - Mixed Use site land at Crumlin Road including Girdwood Barracks
(Objections 906/7, 953/9, 1906, 2965/78 & 3824/2)

The Health Board and Mater Hospital Trust objected to the key site requirements on the grounds that uses falling within Use Class C3 (a) and (b) should be permitted on the site to allow for the future needs of the hospital. The Department considered that Class C3 (b) should be added to the list of acceptable uses. At the Inquiry the Department confirmed that Class C3 (a) uses would also be acceptable. We accept the provision of health facilities is important in this area and agree with the additional suggested uses.

The hospital also objected on the basis that they have a 250-space car park on the site, which they say is essential to the operation and functioning of the hospital. It is apparently leased from the government on an annual basis. We note that there is a masterplan required for the site and consider that the appropriate mix of land uses can be addressed as part of the masterplan process. It would not be appropriate to specify that this car park must form part of the proposals for this very important re-development site in the Plan. There are obvious sustainable transport implications involved in car park provision as well. We consider that this issue should be left to the masterplan process.

Invest Northern Ireland objected to the limitation of business uses to the Crumlin Road Gaol and Courthouse buildings only. The Department has confirmed that this would now only apply to office uses as Use Class B1 (b) and (c) are acceptable uses on all employment sites. The listed and other buildings of the courthouse and gaol would provide potentially 17,000 sq. metres of office floorspace. We consider that this is ample and any more office floorspace would be contrary to the Office Strategy and would be detrimental to Belfast City Centre.

We do not agree that the site should be zoned for employment only (objection 953). This is a very important site for the regeneration of north Belfast and the maximum flexibility is needed to facilitate the re-development of the site so that it can contribute to the revitalisation of this deprived and divided area.

The hospital considered that land to the south should be zoned for health use. These lands are in existing use for health services and so do not need to be zoned as a proposal in the Plan. Adjoining areas of housing are not available for alternative uses and it would be wrong to speculate on future events in such an uncertain climate.

Recommendation

We recommend that additional uses be added to the first key site requirement as follows:

Residential Institutions as currently specified in Class C3 (a) and (b) of the Planning (Use Classes) Order (Northern Ireland) 2004.
We also recommend that the second key site requirement relating to the Masterplan for the site includes reference to the topic of appropriate mix of uses.

**Zoning BT 010 - Existing Employment, Springfield Road (Former Mackies’s Site)**  
**Designation BT 160 Woodvale/Springvale LLPA**  
**Designation BT 162/02 Community Greenway**  
(Objections 3645 & 3824)

The objection to the failure to include business uses in the list of acceptable uses on employment sites has been conceded by the Department and is addressed in Part 1 of this report. The objection also related to that part of LLPA BT 160 and the community greenway BT 162/02 within Zoning BT 010. No map was supplied but we consider that it is clear from the letter that this was the extent of the Invest NI (INI) objection. The Department states that the river corridor has been affected by works associated with the development of the business park by INI and with the adjoining housing zoning WB 04/12. These works involved culverting the river and removal of riverside vegetation. This has had a detrimental impact on the landscape, amenity and nature conservation interest of that part of the site. The Department recommends that the part of the objection lands be excluded from LLPA BT 160. Note – there is no plan of the area to be excluded. There is no comment on the SLNCI designation, which is presumably also affected.

The objection to the Community Greenway related to impact on Invest Northern Ireland’s activities on the site. We see no reason for the development of a greenway to adversely impact on the business use of the site. Its purpose is to link existing areas of open space and this can be accommodated on the vacant land within the site.

Objection 3645 refers to the LLPA being proposed as part of the Springvale development and as this has been substantially shelved then the LLPA should be zoned for housing. The Department has agreed to the deletion of the LLPA from the employment zoning. We have no information to suggest that the plans for the area have been shelved. A new access and roads into the site have been provided. Invest Northern Ireland maintains its interest in the site and objected to the Plan’s provisions as they affect the site. We also note that the Springvale Campus is under construction on Zoning BT 164/03 to the south. In this context we consider that the lands should not be zoned for housing.

**Recommendation**

We recommend that designation BT 160 be removed from within Zoning BT 010. We recommend no change in respect of the other elements of the objections that relate to this site.

**ZONING BT 011 - EXISTING EMPLOYMENT SITES**

**BT 11/02 - Beersbridge Road**  
(Objection 336)
The objection related to the absence of any indication of acceptable uses on employment sites. The Department has confirmed what uses would be acceptable on employment sites (see Employment Chapter in Part 1 of this report) and therefore the objection has been resolved. The objection also referred to a lack of indication of the re-development potential of the site and of any key site requirements. No information was provided of what was envisaged and as the site is an existing employment site then key site requirements would not be appropriate. The general point about offices on all employment zonings is addressed in Part 1 of this report.

**BT 11/06 - Shore Road**  
(Objections 2965/30, 3766 & 3767)

The Department confirmed that planning permission had been granted for residential development on this site and that there was no longer any justification for the zoning. They requested that it be withdrawn and made no suggestion for an alternative zoning. This addresses the concerns of Belfast City Council (2965/30) in terms of problems with employment uses close to residential properties.

Objection 3766 sought deletion of the employment zoning and zoning as a DOS (retail/residential). No justification for retail use on the site was advanced and as the site has planning permission for residential development there appear to be no constraints to its development such as would warrant designation as a DOS. We recommend that it be zoned for housing.

Objection 3767 sought designation of the site and adjoining lands as a District Centre. No evidence or justification was provided in support of the objection. The lands within BT 011/06 have planning permission for residential development and so would not be appropriate for retail use. The remainder of the objection site has been partly zoned as shopping/commercial areas. The units on site are a LIDL store on the portion to the west of Shore Road, an ASDA store to the south of BT 011/06 and a filling station/take-away to the north of BT 011/06. We do not consider that this represents a level of retailing and associated non-retail service uses appropriate for a District Centre designation. We agree with the Department’s assessment that they should remain as shopping/commercial areas. Objection 2965/130 and 3197 also referred to the site of the ASDA store. As part of their response to this objection the Department indicated that the store should be included within the shopping/commercial area. We agree and consider that the area as shown made no sense because all it included was the store’s car park. There is a similar anomaly in respect of half the LIDL store being inside the shopping/commercial area, whilst the rear half is outside. Objection 3201 sought a DOS on all of the LIDL site. We consider that this would not be appropriate as the site is in beneficial use and the issue has been addressed by the entire site being included in the shopping/commercial area.

**Recommendation**

We recommend that Zoning BT 011/06 be deleted from the Plan and the site be zoned for housing.
We recommend that all of the ASDA and LIDL sites on Shore Road be included within the designated shopping/commercial areas shown in the Plan.

**BT 11/08 - Tennant Street/Sydney Street**  
(Objections 1738/16 & 3563/13)

The objection stated that planning permission for residential development had been granted on part of the zoning. We have no information on this matter and remit this to the Department for further consideration. We note that in other cases such as this the Department requested removal of the zoning.

**BT 11/10 - Edenderry Industrial Estate, Crumlin Road**  
(Objection 2006)

This objection did not state the basis for objecting to the zoning and appeared to relate to other uses being permitted. The list of acceptable uses on employment sites will be included in the Plan. The objection provided no information regarding the uses that were envisaged for the site. In these circumstances we cannot comment further on the objection.

**BT11/12 - Ballysillan Industrial Estate**  
(Objections 2801, 2850 & 2855)

The Department confirmed that planning permission has been granted for residential development of the employment zoning. Their opinion was that zoning BT 011/12 should be withdrawn from the Plan and the site zoned for housing. We agree with this suggestion in the light of the planning permission on the site.

Objection 2801 sought retail use on the site to serve Ligoniel village and the adjacent new housing. There are existing shops in the village and no convincing case was advanced to demonstrate a need for new local shops. The objection also referred to commercial use in the same terms. The Department has clarified that the site has planning permission for residential development and recommended withdrawal of the employment zoning, which was also the subject of this objection. The term commercial was not explained and no case based on need was advanced. We recommend no change to the Plan in response to this objection.

Objection 2850 also related to LLPA – BT125, and SLNCI BT102/22. The LLPA included all of zoning BT 011/12, whereas the SLNCI designation is mostly outside that zoning. The Department considered that the lands within zoning BT011/12 should be excluded from the LLPA designation in the light of the planning permission and ongoing development of the site. We agree with this assessment. The objection site also included an area of land around the former millpond and an embankment to the south. This part of the objection site is outside the employment zoning, but is within the LLPA and SLNCI. The Department’s consultees considered that this area retained its landscape and nature conservation interest and should remain within the environmental designations. Having considered the site, we agree with this assessment and consider
that the SLNCI designation should remain as per the Plan and the LLPA should only be removed from the area within zoning BT 011/12. The small overlap between the SLNCI and zoning BT 011/12 is inconsequential, in our opinion.

Another element of objection 2850 related to Community Greenway (CG) BT 162/02. There was no explanation for the objection, presumably it was feared that it would constrain development. Planning permission has been granted for development on the site in the light of the proposed CG. We see no reason for the development of a greenway to adversely impact on the development of the site. Its purpose is to link existing areas of open space down through LLPA BT 125, which is a laudable objective and we see no reason why this cannot be accommodated within the site. We note the community support for the CG (objection 2855 from Ligoniel Improvement Association refers). We recommend no change to the Plan in respect of the Community Greenway as a result of this objection.

The counter-objections were of a general nature and the only element of relevance here is the LLPA designation. In the light of the planning permission on the site we consider that our recommended course of action is justified in this case. Each case must be considered on its own merits. There were no further issues presented for us to consider in relation to this site.

**Recommendation**

We recommend that:

- Zoning BT 011/12 be deleted from the Plan and that land be zoned for housing.
- The land within Zoning BT 011/12 be excluded from Designation BT 125 - LLPA.

**BT 11/16 - Shore Road/Skegoniell Avenue**

(Objection 3054)

The objection was not accompanied by any explanation or evidence as to why the existing employment zoning should be deleted. The Department confirmed that the site is used for warehousing and even if planning permission were granted for retail units on a part of the site then this would not prejudice the employment potential of the site and therefore the zoning should remain. The objection contended that a DOS should be designated. The site is in use and no proposed use was specified nor any evidence supplied. In the light of our conclusions on Policy SETT 5 in the Settlement Strategy Chapter of this report, we recommend no change to the Plan as a result of this objection.

**BT 11/17 - Glenbank Business Park**

(Objection 3824/6)

This objection related to LLPA BT 125 and specifically an embankment adjoining zoning BT 11/17. The objection stated that this embankment was within the ownership of
Invest NI and the LLPA designation may affect future works to stabilise the embankment, which supports the adjoining business park. This part of the LLPA is a pleasant wooded river bank, which meets the criteria for designation in PPS6. The designation does not preclude all development. Sympathetic proposals for urgently necessary works to the embankment could still be considered. We therefore do not consider that the LLPA should be amended in response to this objection.

**BT 11/18 - Donegall Road**  
(Objection 906/15)

The objection supported the zoning provided that access was not through the Belfast City Hospital site. The objector claims that half the site is not in employment use and is in fact owned and used by the hospital. They requested a key site requirement controlling access. This zoning relates to existing uses and cannot be subject to key site requirements. We fail to see the issue given that the objector claims ownership of most of the site in any event. We recommend no change to the Plan as a result of this objection.

**BOUCHER ROAD AREA**

**Objections to Employment Zonings BT 11/20, BT 11/21 & BT 11/22**  
Objections stating that the area should be designated for Retail or Office Uses  
(Objections 199, 343, 1681, 1682, 2162, 2666/7, 2883, 2931, 2954, 2965/18-20, 3045, 3682 & 3745)

There were many objections to the existing employment zonings at Boucher Road on the basis that existing non-employment and sui generis uses were not recognised as well as many retail uses. The Department initially defended the zonings in their statements. However, at the hearing, the Department acknowledged the reality of the situation at Boucher Road and re-considered their position. They recommended that the zonings should be removed and this area left as white land. The objectors who were present were content with this. We consider that this would address the concerns of objectors that the zonings did not reflect the situation on the ground and in the BUAP. We will address specific suggested designations below.

The Department has suggested deleting these zonings from the Plan and leaving the area as white land. It would not therefore be possible to include the areas of white land identified by Belfast City Council within the zonings. The objections were arguing that all of the Boucher Road Estate should be included in the zonings. If the zonings are dropped then there is no issue: the whole area would be white land.

Several objectors stated that the area should be zoned for retail and/or office use. We recognise that there are many retail units on Boucher Road. This is a product of the planning history of the area. We also note that further retail units have recently been completed and occupied. Whilst we consider that the decision on the part of the Department to delete the employment zonings is a proportionate response; retail designations would not be appropriate. A carte blanche for retail proposals would...
undermine the retail strategy and policies of the Plan and be contrary to regional
guidance. We do not accept that the area functions as a District Centre. It does not
have the characteristics of such centres as described in paragraph 49 of PPS5. It does
not provide locally accessible convenience goods. Rather the retailing offer is
composed of retail warehouses and out of centre shopping. There are poor linkages
between the retail units, which are mainly accessible by car. We consider that the
legitimisation of this situation within a District Centre designation would not be in accord
with planning policies for the protection and enhancement of city centres. It could also
undermine the vitality and viability of designated District and Local Centres. Any
designation for office use would also be contrary to the Office Strategy. The
Department would still be able to assess individual proposals under prevailing planning
policies as the lands would be unzoned. This would address the concerns raised in
objections 1681 and 1682 related to planning applications for offices on sites at Falcon
Road and Glenmachan Crescent. We note that the latter site contains a new business
studio building, so presumably the application there was approved.

It would not be appropriate to consider a designation for bulky retailing or car
showrooms as suggested by some objectors. There is no basis for this type of
designation in regional policy and it is not an issue unique to the BMA requiring a
tailored local policy. There are also many existing and permitted uses that would not
fall into either of those categories.

We consider that the Department should review the status of Boucher Road in the light
of the many retail units that have been approved and constructed there. The impact of
these units on the City Centre and designated District and Local Centres should be
assessed and a coherent strategy to guide future planning decisions in the area
prepared. The current ad-hoc approach is not in the interests of the proper planning of
the wider area and should not continue.

Recommendation

We recommend that Zonings BT 011/20, BT 011/21 and BT 011/22 be deleted from the
Plan and that the areas be left unzoned. There should be no other alterations to the
Plan as a result of these objections.

Sites around Boucher Road outwith Employment Zonings
(Objection 3682)

This objection sought a DOS designation on lands at Boucher Road. The site is
currently occupied by a car dealers premises with a parade of shops, etc. Our strategic
approach to DOS is that they should generally be in city centres or town centres unless
they are in a strategic location where they will promote the vitality and viability of the
urban area or enhance townscape. The site is not in a key location and no evidence
was provided to explain why a site such as this should be designated as a DOS. In our
strategic chapter, we also did not support the designation of lands that are already
developed with buildings in good condition and that are well utilised as opportunity
sites. The site is outside the City Centre and the objection does not meet the
requirements set out in our consideration of Policy SETT5. We therefore recommend
no change to the Plan as a result of this objection.
**Broadway Roundabout Area**  
*(Objection 3834)*

The objection specified lands at the Broadway roundabout and sought a gateway site designation. The objection refers to adjacent lands being zoned as opportunity sites. The Plan only identifies gateways to the City Centre i.e. sites within the City Centre. No explanation of why this site should be an exception to the general plan approach was provided. This junction has been improved and expanded since the objection was submitted so that the roundabout is now above the main M1-Westlink. This area contains several major routes and one of the busiest junctions in Northern Ireland. It is crossed by several important footways that are well-used. This precludes any scope for development, in our opinion. There is also no indication of what the objectors sought to achieve.

The lands around the periphery of the junction are partially in use and partly vacant. The lands north of Donegall Road, adjacent to Monarch Street, comprise a demolished factory, two small halls and a monumental mason’s premises. The identified former depot at Glenmachan Street has been demolished also. These sites are at strategic locations and may have been appropriate for DOS designations. We have recommended that the vacant site at Monarch Street should be zoned for housing and prefer this to a DOS in view of the shortage of housing land in the city. The Other vacant site relates well to Boucher Road where development proceeds apace. We therefore see no reason to designate the site as a DOS. In addition, the objector has not provided any information as to the reasons why the sites should be designated or what uses or developments are envisaged.

The remaining premises south of Donegall Road has been re-developed and is for sale/let as a modern showroom. We did not support the designation of lands that are already developed with buildings in good condition and that are well utilised as DOS in our consideration of Policy SETT5. We recommend no change to the Plan as a result of this objection.

**BT 011/24 - London Road**  
*(Objection 2965/31)*

The Department has confirmed that the site has planning permission for residential use. They recommend that the employment zoning be deleted from the Plan. This would address the objection in full. We concur with the Department’s view. Given the planning consent, there is no need for the site to be zoned for housing.

**Recommendation**

We recommend that Zoning BT 011/24 be deleted from the Plan.

**BT 011/25 – Ravenhill Road**  
*(Objection 2812)*
The Department has confirmed that the site has planning permission for residential use. They recommend that the employment zoning be deleted from the Plan and that it should be re-zoned for housing. The objector has confirmed that this would address their objection in full. We concur with the Department in respect of the employment zoning. Given the planning consent, there is no need for the site to be zoned for housing.

**Recommendation**

We recommend that Zoning BT 011/25 be deleted from the Plan.

**BT 011/26 – Millar Street/Ravenhill Avenue**  
(Objection 930)

The objection was to the employment zoning suggesting that it should be included within housing zoning EB04/04. The objector indicates that the area is undergoing a transformation to residential uses. Whilst some of the buildings have been demolished and the sites cleared, we note that units within the zoning are still in use (e.g. for car sales and a printing business). We have no information of any planning permission on the site for residential development, which distinguishes it from the adjoining zoning BT 011/25. In these circumstances we cannot agree with the objector and recommend no change to the Plan as a result of this objection.

**BT 011/27 – Ravenhill Business Park**  
(Objection 2965/29)

This objection was to the exclusion of the Tennant Textile Factory (opposite side of Ravenhill Road) from the existing employment zoning. The Department indicated that there was no need to zone what remains of the factory. We agree and conclude that its status would not preclude employment uses on the site. We note that the site is well used at the moment. This is a prominent site adjacent to the Albert Bridge and there should be a degree of flexibility in considering any potential future uses for it. We recommend no change to the Plan as a result of this objection.

**BT011/29 - Blacks Road**

See West Belfast Section under Housing Zoning WB04/08

**BT 011/33 – Springfield Road**  
(Objection 3824/7)

The objector requested that the zoning be extended slightly across the access road to Springvale Business Park in order to include all their landholding. The Department clarified that part of this land was in Designation BT 160 - LLPA. They confirmed that inclusion of the land in question in the employment zoning would have a negligible effect on the LLPA and recommended that the objection should succeed. We agree
with the parties: the land is astride a new access road to an industrial estate and should be included in the employment zoning.

**Recommendation**

We recommend that zoning BT 011/33 be amended to include the land shown on Fig. 2 attached to the statement of case for objection 3824/7. As a consequence the portion of this land within LLPA BT 160 should be removed form the LLPA designation.

**BT 011/36 - Argyll Business Park, Shankill Road**  
(Objections 1738 & 3563)

The objections sought designation of the lands for community regeneration housing (subject to community support). The site is in beneficial use as a business park and presumably the owners’ intend these businesses to continue. We cannot recommend zonings subject to caveats of community support. We recommend no change to the Plan.

**BT 011/39 - Andrews Mill, Divis Street**  
(Objections 2720 & 3825)

Objection 2720 related to no acceptable uses being indicated for the site and no key site requirements being attached. We have addressed the list of acceptable use on employment zonings in Part 1 of this report. Key site requirements are not appropriate for an existing zoning. The objection also referred to offices being allowed on employment zonings generally. There was no argument related to this specific site. Again we have considered this matter in Part 1 of this report. We recommend no change to the Plan as a result of this site-specific objection.

Other objections including Objection 3825 (NIHE) recommended that the zoning should be changed to mixed use to provide additional housing. The site is in beneficial use as a flour mill premises. In the absence of any information on the owners’ intentions we cannot agree to this approach and recommend no change to the Plan.

**BT 011/43 - Glen Road**  
(Objection 2091)

Planning permission has been granted for a major mixed use scheme. The Department considered that the existing employment zoning should now be withdrawn from the Plan. As the storage and distribution use of the site has been supplanted by this permission we agree that an existing employment zoning is no longer appropriate on the site. No alternative zoning was suggested or is obvious from the planning permission.

**Recommendation**

We recommend that Zoning BT 011/43 be deleted from the Plan.
OTHER OBJECTIONS TO EXISTING EMPLOYMENT ZONINGS

**BT 011/35**
(Objections 485, 3112 & 3645)

**BT 011/42**
(Objection 2857)

These objections all related to lands within employment zonings and contended that residential development should be permitted on the sites. Some provided evidence of vacancies in commercial property in the area and difficulties securing tenants. We note that Lanark Way is an interface area where new housing may be difficult to secure and employment use may be more realistic. In the absence of any information on the owners’ intentions or firm proposals for the sites or planning permissions for residential development, we cannot recommend any change to the Plan on the foot of these objections.

TRANSPORTATION

**Proposal BT 012 - A55 Outer Ring Road (Knock Road)**
(Objections 1146, 2907 & 3644)

Objection 2097 stated that the proposal was inadequate and that the A55 should be a dual carriageway from Upper Newtownards Road to Castlereagh Road. The scheme has identified the single remaining bottleneck on the A55 and proposes an improvement to address this. There has to be some recognition that an infinite amount of money is not available and that schemes must be prioritised. This was the purpose of the RTS and BMTP. We cannot question the priorities that have been identified. We were not provided with any basis for this objection other than problems at the King’s Road junction (which is affected by the proposal anyway). The objection refers to problems with right turns from side roads on such a busy route. This will always be the case with urban roads and there is no cost-effective alternative.

The remaining objections (1146 & 3644) were concerned with the detail of the scheme in the Shandon Park area. The later submissions questioning the value of proceeding with the scheme go beyond the scope of the original objection and cannot be considered. The acquisition of nos. 11 and 13 by Roads Service and their future use is not a development plan matter. The precise detail of the scheme – junction layout, slip roads and effect on the surrounding roads – will be subject to the necessary statutory procedures. The impact on Shandon Park will be assessed at that stage. Roads Service did confirm that they had and would be consulting with residents concerning the detail of the scheme. Traffic calming would be provided along Shandon Park to prevent excessive vehicle speeds. We recommend no change to the Plan as a result of these objections.
Objections to Non Strategic Road Schemes BT 013/01 Connsbank Link and BT 013/02 Holywood Arches Bypass
(Objections 820, 1803, 2760, 3703, 3705, 3708, 3711, 3726, 4245, 4257, 4259)

Proposal BT 013 comprises 2 elements: BT 013/02 proposes to bypass the Holywood Arches junction by linking the Upper Newtownards Road with Albertbridge Road and BT013/01 - Connsbank Link proposes to take a spur from the bypass to provide a new road linking directly to the Sydenham Bypass. Objectors had differing views of the scheme – for some the main concern was the need for clarity about responsibility for its delivery while others questioned the need for the scheme and its environmental impact.

Turning firstly to the need for the scheme, the proposal has been carried forward to BMAP from BUAP where it formed part of a much more extensive road proposal as part of the Eastern Approaches Strategy. This proposal has been replaced in BMAP with a public transport solution, the EWAY, between Dundonald and Holywood Arches but the Plan retains the remainder as a road proposal to link with the Sydenham Bypass. Introduction of the EWAY is intended to promote a modal shift which, combined with the Connsbank Link, should reduce the amount of traffic using the current junction. We appreciate the benefit of separating the EWAY from road traffic at the junction but agree with objectors that increasing capacity for cars is likely to undermine the objective of encouraging increased use of public transport. We are not persuaded that the provision of a bypass would offer significant benefits to shopping frontages along the Newtownards and Holywood Roads or the creation of an urban village as the area is currently well served by off street parking and there is extensive shopping provision at the adjacent District Centre at Connswater. Overall we are not persuaded of the need for proposal BT 013/02 in its entirety.

The Connsbank Link element of the scheme aims to provide a direct link to the Harbour Estate from the vicinity of Holywood Arches via BT 013/02. This element of the proposal is linked to a new junction to the Harbour Estate from the Sydenham Bypass and closure of the Dee Street junction. For traffic that does not use the Sydenham Bypass, the Harbour Estate is currently served by a bridge at Dee Street which is accessed through residential areas which become congested, particularly at peak periods. We acknowledge that a new bridge at Dee Street would be a less costly solution. Nonetheless, while a new bridge could enhance capacity and the link could be maintained to the Harbour Estate even if the Dee Street junction was closed, we agree with the Department that its replacement would be undesirable. Even with the modal shift envisaged, the Department’s projections are for a significant increase in traffic from this part of the City. We therefore see considerable merit in principle in providing a direct link to Sydenham Bypass which would significantly reduce non-local traffic in these residential areas, would provide a direct route to the Harbour Estate and would ease congestion on the Newtownards and Albertbridge Roads.

The proposed route of the Connsbank Link follows part of the Community Greenway extending to Cregagh Glen and encroaches on the King George V Playing Field. Belfast City Council and other objectors had concerns about the encroachment on the Community Greenway and open space, the culverting of Connswater and the impact on the access to Victoria Park. The access to Victoria Park is considered in relation to BHA 11 as it will not be affected by this part of the proposal. A well utilised and landscaped pedestrian path is already in place between Park Avenue and Newtownards Road.
along the banks of Connswater and the evidence to the Inquiry was that Roads Service were working with East Belfast Partnership to review their respective requirements in view of EBP’s proposals for an enhanced Greenway involving pedestrian and cycle provision for which lottery funding is sought. We were provided with no evidence to suggest that EBP’s requirements can not be met although we accept that the ‘Greenway’ concept will be less attractive if the road proposal goes ahead. Some encroachment onto the playing fields is inevitable but we note that no formal pitches are laid out and the proposed route encroaches primarily onto a rough hardcored parking area that was used for pallet storage at the time of our visit. Provided the final alignment of the road makes provision for pedestrians and cyclists and minimises the impact on the open space, we consider that these features will not be unacceptably affected. The culverting of the river represents the most significant of the impacts in visual and environmental terms. Undoubtedly the visual impact of culverting would have an adverse effect on the attractiveness of this part of the Greenway. Considered in the wider context of the Greenway as a whole, however, we conclude that the erosion of the quality of this section is justified in the context of the benefits of the road proposal. There are, however, wider environmental considerations; in this respect we note the Department’s evidence that the proposal will be subject to environmental assessment which will allow detailed consideration of the environmental effects of the road, including flood risk, and provide for further public scrutiny.

We turn now to the prospect of delivery of the road and the scope for protection of the roadline. While the Plan is clear that the proposals are non-strategic and to be funded by developers, the Department accepted at the Inquiry that there were no zonings that would allow delivery of either proposal by developers. They were clear that both the strategic function and funding arrangements would have to be reconsidered; the schemes may be reclassified as strategic in conjunction with the EWAY and Sydenham Bypass improvements and would therefore attract public funding. It is most unsatisfactory that no decision was forthcoming on this matter by the time of the Inquiry as it became evident that its retention as a proposal in the Plan is dependent on the Department’s agreement to fund the scheme. Given the uncertainties about the status of the proposal as originally envisaged, it is highly unlikely that it will be delivered during the Plan period. Nonetheless, if the outcome of the Department’s deliberations is that it should form part of the nearby strategic schemes, it is important that protection should be afforded to it in the Plan. It seems to us that if the line was not protected, there is limited scope for an alternative route that would not involve significant impact on existing residential neighbourhoods. Notwithstanding our reservations about the impact of the scheme as set out above, the route proposed appears to be the optimum one for delivery of the link. On balance, therefore, we urge the Department to complete its deliberations on the status of the scheme and, if it is concluded that it will be publicly funded, we recommend that proposal BT 013/01 should be confirmed together with the section of BT 013/02 between the Upper Newtownards Road and Parkgate Avenue. In the absence of a funding commitment, the proposal should be deleted from the Plan. The remainder of BT 13/02 cannot be justified and should be deleted from the Plan.

**Recommendation**

We recommend that:
• the Department reconsider the status of and funding arrangements for BT 013/01 and that portion of BT 013/02 between Upper Newtownards Road and Parkgate Avenue. If it is concluded that it is to be a strategic route that will be funded by the Department, the policy text should be amended. If it is not to be a publicly funded scheme, the proposal should be deleted from the Plan; and

• the remainder of BT 013/02 should be deleted from the Plan.

Proposals BT 14/01 & MCH 17/01 - EWAY
Proposal MCH 16 Quarry Corner - East Link Road
(Objections 391, 429, 435, 468, 699, 702/6, 820, 952, 1763, 2666, 2917, 3381, 3383, 3390, 4219 & 4232)

This section will consider the entirety of the EWAY scheme from Belfast to Quarry Corner on the Upper Newtownards Road. As such objections to BT 14/01, MCH 17/01 and MCH 16 will be considered here. The objections to the principle of the scheme arguing that the former rail line should be retained purely as a footpath and cycleway cannot be supported. No evidence was supplied to demonstrate how the proposal is seriously flawed. The RDS refers to the possible promotion of rapid transit type schemes in Chapter 11. The scheme is included in the BMTP, which has been prepared to implement the policies of the RTS (a sister strategy to the RDS). There are clear sustainability and environmental benefits in improvements to public transport. We are told that the detail of the scheme will make provision for footways and cycle lanes so that the current asset will not be lost. The Sustrans objection argued that the EWAY should be shown as a Community Greenway as well as a rapid transit route, since EWAY proposals include a parallel segregated path for walkers and cyclists; it considers that if EWAY is not provided, then the Greenway should be developed regardless. The route of the EWAY will be a part of the National Cycle Network. The route of the former railway currently provides a surfaced path for pedestrians and cyclists which is traffic free. It extends from Holywood Arches through East Belfast and Dundonald and extends into open countryside as far as Comber. It is well used by both pedestrians and cyclists providing a corridor link between the urban area and the countryside. Although it does not directly link areas of open space, it provides greater permeability of the urban area to pedestrians and cyclists allowing more convenient access to areas of open space than via the urban road system. As such, we consider that it fulfils the function of a Community Greenway as set out in Part 1 of the Plan. We consider it important that in the design of the EWAY, the asset is not lost and accordingly agree that the current route should be shown as a Community Greenway. The section of the EWAY between the Upper Newtownards and Comber Roads should also make provision for pedestrians and cyclists.

We consider that use of the track by rapid transit vehicles would not be unduly disruptive to residents or pedestrians or cyclists. The track is already in use and therefore the impact on the resident’s privacy or security would be limited and outweighed by the benefits of the scheme. The loss of habitat will be weighed at detailed stage against the sustainability benefits of the proposal but need not be an impediment to the proposal that would justify its rejection at this stage. The limited loss of any habitat would be out-weighed by the sustainability benefits of the proposal. No
information on how the proposal would lead increased pollution was provided. The scheme would result in less pollution by encouraging people to use public transport, in our opinion. The objectors seem to have missed the point of the new road (MCH 16). Its purpose is to link the EWAY to the main transport corridor of the Newtownards Road and the Park and Ride at Millmount. The scheme is therefore a part of the public transport provisions of the Plan and not merely a road proposal. The cost of the scheme as compared to buses is not a matter for the Plan.

We have made our position clear on the speedy implementation of public transport schemes and this is doubly important in relation to this scheme as it is promoted as the pilot scheme. We have also made it clear that access to public transport is a key factor in determining the location of housing land in the Plan area. The presence of the EWAY will be a one of a number of important factors to be taken into account in our consideration of objection sites seeking additional housing land (just as it was in the draft Plan’s housing zonings). The issue of developer funding for the EWAY does not appear to have been pursued by the Department. It is stated that the necessary budget for implementation of the scheme has been set aside as part of BMTP.

The detailed scheme is in the course of preparation and that will address many of the site-specific issues raised. It is important to note that the scheme is also subject to separate consent procedures and a possible public inquiry. The objections are considered in this context. The road protection corridor is shown on Plan Amendment No. 1 Clarification Map No. 31 – Quarry Corner – East Link Road and EWAY (Rapid Transit Scheme). This is all the detail of the scheme that is before us.

There is no evidence that the scheme will adversely affect development at 2 Knockvale Grove. The site is not within the road protection corridor as shown on Plan Amendment No. 1 Clarification Map No. 31. We are unaware of any other plan proposal that could affect this site. The scheme with planning permission that is referred to in the objection appears to have been completed.

The PSNI objected to the route presumably due to the loss of a car park associated with their HQ on Knock Road. However, we were provided with a letter from the Head of PSNI Estates acknowledging that the land in question is owned by DRD and that PSNI will have to vacate the land for the development of the EWAY. We therefore consider that the line of the scheme should not be varied to avoid this car park. This is a concern of the residents nearby who objected to the effect on their properties.

The concern related to the fact that the protection line deviates from the former rail line at its junction with Knock Road. BMTP states that the scheme will require the retention of the protection line for the E14 Comber Route scheme indicated in BUAP. We understand that the E14 proposal has been formally abandoned by Roads Service and indeed it is not included in this plan. There seems little logic in safeguarding the protection line of an abandoned road scheme, if that is what has occurred here. The EWAY should have its own identified protection line.

Turning to the line in this area as shown in the Plan and clarified in the Plan Amendment. The concern related to the extent of the road protection corridor and the effect that this would have on properties in King's Road. These properties are set well back from the line of the EWAY and at a lower level. The gate lodge to no. 57 Knock...
Road is within the corridor. This part of the line is also within the King’s Road Conservation Area. There is a special duty to preserve or enhance the character and appearance of a Conservation Area when making planning decisions. The land to the north of the former rail line falls steeply at this location. It contains mature trees and a stream. Any deviation in the line northwards would have significant detrimental effects on the Conservation Area and inevitably entail the extra costs associated with retaining structures and infilling the land. We agree with the objector that the width of the protection corridor appears far in excess of what would be required for the EWAY and a footway/cycleway. The existing footway/cycleway is approximately 3m wide for example. We consider that the scheme should be as sympathetic to the Conservation Area as possible. This would be a more important consideration than safeguarding car parking spaces for the PSNI. There appears to be no security issue with the existing Footway/cycleway, which runs right next to the PSNI HQ. If another possible reason for the extra land is the provision of a stop in this area then we also agree with the objector that there appears to be ample unused land on the other side of the Knock Road. We therefore recommend that the line should adhere to the former rail line and avoid the King’s Road Conservation Area as much as possible.

The existing Footway/cycleway utilises request traffic lights for pedestrians and cyclists to cross Knock Road. We see no reason why the EWAY cannot operate in a similar manner. The matters of the number location and design of crossings are detailed ones to be considered later. We are sure that the Departments will have regard to the existence of pedestrian crossing points when making these decisions. Similarly minimising the impact of Proposal MCH 16 on the drumlin landscape will be addressed in the detailed design. The possibility of a Mesolithic site on the route would be addressed in the detailed design of the scheme, which would be required to comply with all statutory procedures. The NIEA raised no concerns in this regard in relation to the Plan or BMTP. We note that the route is wholly within a committed housing zoning in the Plan (MCH 03/12) and this land will be developed anyway in due course. The traffic implications and impact on the surrounding road network are matters to be addressed in the detailed design and we cannot comment further on them as part of this process.

**Recommendations**

We recommend that:

- The EWAY be shown as a Community Greenway and the detailed design makes provision for pedestrians and cyclists.

- The Department reviews the width of the Road Protection Corridor (as shown on Plan Amendment No. 1 Clarification Map No. 31) in the area to the west of Knock Road in order to minimise the impact on King’s Road Conservation Area.

**Proposal BT 14/02 WWAY, Rapid Transit Scheme**

*(Objections 906/1, 2022/37, 2258/80, 2965/21 & 3537/3)*
The Belfast City Council objection was primarily concerned with the scope of the proposal and the implementation of Quality Bus Corridors. There was a concern that the proposals of the RDS and RTS were being watered down. Both they and West Belfast Partnership emphasised the importance of the scheme for west Belfast, which allegedly suffers from deprivation. The need to implement the scheme as soon as possible and allow for higher density development along the route was stressed.

Lisburn City Council was concerned that the scheme did not extend to Lisburn as envisaged in the BMTP. The Department clarified that the implementation of WWAY was scheduled for after that of the EWAY, which is identified in BMTP as the pilot scheme. The route shown extended to the Falls Road as thereafter it would be possible to utilise the Quality Bus Corridors and run the scheme on-street. The extent shown is that identified in detail in BMTP and the possible extension to Lisburn is a longer-term aspiration and could be achieved on-street also. Lisburn is already served by rail services in any event. We consider that rapid transit schemes should concentrate on areas not already well-served by other modes of public transport. The scheme does include links across the City Centre to the other proposed routes and so that concern is addressed. The implementation of Quality Bus Corridors is outwith the scope of this report as stated above. Allowing higher density development has been addressed by the Department in the Arterial Routes designations (considered elsewhere in this report) and is also a consideration as part of the development management process.

The Eastern Health and Social Services Board objected to the route through the Royal Victoria Hospital on the grounds that it could prejudice development proposals by the Hospital. They also argued that differences in level across the route could cause difficulties, that it was convoluted and it could cause/add to congestion. The Department’s response was that the route through the Hospital site had not been finalised and that it was shown as indicative in Plan Amendment No.1. We were informed that discussions had taken place with the Hospital in 2003 and that studies were ongoing. We consider that it is vital that the scheme serves such a major traffic generator (as does Belfast City Council). The Eastern Health and Social Services Board welcomed WWAY and the fact that it serves the Hospital. We agree that the line should remain indicative until such time as the route has been finalised. The route should be decided in consultation with the Hospital and must not prejudice its day-to-day operational performance and expansion plans. The Eastern Health and Social Services Board requested that some text be inserted into the Plan to reflect that there should be consultation with the hospital in finalising the route. The Department agreed with this suggestion, which we endorse.

The owners of the DOS CC055 on the Grosvenor Road objected to the excessive land take shown in the Plan affecting their site. They suggested that the matter should be addressed by an indicative route across the site. The Department saw merit in this suggestion and sympathised with the concerns raised. They agreed to the removal of the protection area (as shown in Plan Amendment No. 1 – Map No. 33) subject to the addition of a further key site requirement to Zoning CC055. The Plan would simply show two access points in line with that submitted with the objector’s statement of case. We agree with the Department’s approach and recommend accordingly below.

**Recommendations**
We recommend that:

- The Department inserts some explanatory text to the effect that the actual route where W-Way crosses the Royal Victoria Hospital site should be identified in consultation with the Hospital.

- The road protection corridor across Zoning CC055 shown on Plan Amendment No. 1 – Map No. 33 be deleted and replaced by two access points as shown on the plan accompanying the objector's statement of case for objection 3537/3.

- A further key site requirement be added to Zoning CC055, to read as follows:
  
  o Provision for a rapid transit route through the site between the proposed access points as identified on Plan [insert plan no.], such as would allow a grade separated crossing of the Westlink (A12).

**Objections to proposals BT 014/03 and MCH 17/02 - Rapid Transit Scheme SuperRoute**

(Objections 266, 699/22, 820/44&45, 942/3, 959/8, 1038, 1053, 1080, 1083, 1120, 1128, 1131, 1136, 1139, 1141, 1143,1150, 1152, 1163, 1216, 1255, 1260, 1269, 1274, 1279, 1274, 1279, 1284, 1301, 1306, 1309, 1313, 1314, 1348/1, 1492, 1502, 1507, 1510, 1520,1531, 1534, 1539, 1819, 1848, 1852, 1854, 1858, 1924, 1930/1&2, 2145, 2166, 2213, 2220, 2259, 2293, 2328, 2334, 2661, 2913/4, 2965/22, 3861, 4212, & 4257/5)

The BMTP proposed the SuperRoute Rapid Transit Scheme to link Belfast City Centre with Cairnshill Park and Ride on the Downpatrick Metropolitan Transport Corridor. This proposal has been carried through to BMAP and the land use implications are shown on Plan Amendment No 1. Most of the objections related to the section of the proposed route between Annadale Embankment and Belvoir Road where it crosses the Lagan Valley Regional Park. The objectors expressed concerns about environmental matters including the impact on Belvoir Park Forest which contains many very old and valuable trees, the effect on biodiversity, fragmentation of habitats, severance of the historic Belvoir Demesne, impact on the historic Breda graveyard and impact on Belvoir Park Golf Course. The Department’s position at the Inquiry was that the route indicated between Belvoir Park Forest and Belvoir Park Golf Club was the preferred route but that further assessments needed to be undertaken and alternatives could not be ruled out. On this basis the Department was content that the precise line where it crosses the countryside could be removed from Map 32 and the line on Map 19 would be replaced with an indicative line. The explanatory text of Proposal MCH 17 would be amended as follows; “An indicative line is shown across the Castlereagh countryside between 2 points as indicated on Map 19. The final precise line, should this remain the preferred route, will be determined following further assessment and by way of a separate statutory process that will afford appropriate public consultation.” This amendment satisfied some of the objectors but others were concerned that it established the principle of a route through Belvoir without examining other alternatives. We consider that the inclusion of “should this be the preferred route” suggests that other alternatives
will be examined. Notwithstanding the desirability of providing a dedicated public transport route to the south eastern part of the city (which would also allow convenient access to the Major Employment Location at Purdysburn), in view of the sensitivity of the route chosen, we consider that alternatives need to be fully investigated to ensure that the route proposed is the optimum solution. Part of this exercise should involve consideration of whether the route should seek to serve the Belvoir Estate, Saintfield and Ormeau Roads and Forestside as suggested by objectors. The practicalities of using the road network at Stranmillis for rapid transit also need to be addressed. Until a more detailed analysis of possible alternatives has been undertaken and the environmental impacts of the proposed route are known, we consider that it would be premature even to show an indicative line for this part of the route through Lagan Valley Regional Park. In any case, the absence of such protection is unlikely to prejudice future provision of the scheme as there is a presumption against development in the Park. Accordingly, we conclude that the protection provided through BMAP should relate only to the urban sections of the proposed route.

The Department’s amendment related specifically to Proposal MCH 17 but concerns have also been raised about the section of Proposal BT 014 between Belvoir and Annadale on the basis of its importance to the setting of the Lagan Corridor. As this section of the route is a continuation of the rural route through Belvoir Park Forest/Golf Club, removal of the protection corridor for this section would also be appropriate. This would also address objection 266 which sought clarification of the proposal in relation to zoning SB 05/04.

Objection 1348 objected to the impact of the proposal on Newtownbreda High School. The protection corridor suggested a loss of around 1 ha which would impact on the school’s amenity space and may be required in the future for new school buildings. No plans had been drawn up to redevelop the school at the time of the Inquiry. The protection corridor at the school includes land for both the Saintfield Road Relief Road and the SuperRoute. The Department emphasised that the land take in the Plan was a protection corridor and it may not all be required. There would also be detailed discussion with the school to minimise impact on it. In view of the fact that the route in this area has limited flexibility and is surrounded by urban land that could be developed for a range of uses, we consider that the transport proposals in this area could be prejudiced if protection was not afforded through the Plan. We therefore conclude that it would be prudent to protect this part of the scheme. For the same reason we consider that protection should continue to be afforded to the lands identified in objection 1924.

Recommendations

We recommend that:

- The countryside section of the road protection corridor on Plan Amendment No 1 Clarification Map No 32 - SuperRoute is deleted between Annadale Embankment and Belvoir Road.

- The countryside section of the Rapid Transit Scheme on Plan Amendment No 1 Map No 19 - Belfast/Castlereagh is deleted between Annadale Embankment and Belvoir Road.
The explanatory text for Proposals BT 014 and MCH 17 is amended to read: “The Department’s preferred route for the Super Route proposal is across the Belfast and Castlereagh countryside between Annadale Embankment and Belvoir Road. Further assessment of this part of the proposal will be undertaken, including alternative routes, and the final precise line will be determined by way of a separate statutory process that will afford appropriate public consultation.”

Proposal BT 015/01 - Park and Ride, Tillysburn
(Objections 1920/19, 2917/6 & 2965/24)

The plan states that the proposal will be served by a dedicated bus service to the city centre. The proposal has its origins in BMTP and is the park and ride proposed for the Bangor corridor (MTC E). The location has been chosen in accordance with the guidance on page 5-32 of BMTP.

Objectors made the point that the corridor was already well-served by public transport in the form of the rail line. Use of the existing rail infrastructure should be encouraged rather than increased use of the motor car. This would involve improved parking at Bangor railway station rather than this proposal. The Tillysburn Park and Ride would only divert traffic from Belfast City Centre, whereas facilities in Bangor would encourage a modal shift as advocated in the RDS, RTS, PPS13 and PPS3. We are satisfied that the identification of park and ride sites is a function of the development plan and that this proposal complies with policy AMP10 of PPS3 insofar as matters of principle are concerned. The Department’s answer to the objections was that the proposal is intended to provide greater choice and is complementary to the rail infrastructure. The Department gave an undertaking to examine the position in relation to parking at the railway station in Bangor. It was considered that this proposal was necessary as well.

We recognise that the proposals for park and ride are complementary to rail services and are intended to serve a different market. The Department pointed out that park and ride sites can be served by bus or rapid transit services. We have commented on the proposed CITI route rapid transit proposal above. There are plans to provide a rapid transit service to the City Airport, which is reasonably close to this site. The other rapid transit proposals on main transport corridors will be served by park and ride sites at the end of the route. This means that the users of these park and ride sites can transfer directly to the rapid transit line, once provided. Tillysburn is on the opposite side of a major road and rail line from the CITI route and so direct transfer would be very difficult. Belfast City Airport supported a bus based facility but argued that the proposal should be located within Belfast Harbour Estate. The Department’s response to this suggestion focussed on problems with gaining direct access to the main road and the costs of acquiring a site. The Tillysburn site has no land costs because it is owned by Roads Service. We consider that the land cost is one of a number of considerations and the priority should be to identify the optimum location for the proposal. In any event, agreements could be negotiated with the airport and/or Harbour Commissioners to minimise costs, especially in view of their support for an alternative location for the proposal. The proposal could also serve a dual function as a Park and Ride (serving a rapid transit route) and a car park, which could benefit the airport users. We agree with
Belfast City Council that the possibility of linkages with rapid transit proposals, the airport, the rail line and Holywood Exchange has not been properly investigated.

It could also be argued that the proposal is in the wrong location and that a location to the north would intercept traffic prior to the heavily trafficked Knocknagoney junction. The Harbour Estate is served by a grade separated junction to the north, which would appear to be a perfectly good access point. We consider that signage could direct users to the proposal and note that the arrangements would be similar to the Park and Ride proposal at Fortwilliam.

The site of the proposal is a pleasant planted area adjacent to a proposed LLPA. Its loss to a car park would be detrimental to the visual amenity of the area. We are convinced that it is not the correct site for the proposal, for this reason and the reasons given above. The proposal should be deleted from the Plan and alternative locations investigated.

We have considered Belfast City Council’s objection related to transport corridor plans above and concluded that they are outwith the scope of the original objection. Their submission on this proposal based on the concept of transport corridor plans cannot therefore be considered further. Rail 21 suggested that the park and ride should be rail-based served by a new station at Holywood Exchange. We consider that this would be detrimental to the proposed railway station for the City Airport and would not attract the patrons of the stores at Holywood Exchange.

**Recommendation**

We recommend that the Proposal BT015/01 – Park and Ride, Tillysburn be deleted from the Plan and that alternative locations are investigated in conjunction with the CITI route.

**Proposal BT 015/02 - Park and Ride, Kennedy Way**

(Objections 2258 & 2965/23)

The site adjoins the M1 to the rear of the Westwood Centre. The site is identified in BMTP for the provision of a local park and ride facility. The rationale for the choice of location is set out on page 5-32 of the BMTP and we accept that the site falls within the parameters indicated in terms of distance from the City Centre. The park and ride facilities at Sprucefield and Black’s Road are too far out to be economically viable in the longer-term. They are intended to be strategic park and ride sites to encourage car sharing and transfer to existing bus services. In any event, the Black’s Road site is within the area of poor air quality identified by Belfast City Council in their submission. So whilst it is true that there are other park and ride sites on this transport corridor at the moment; these are temporary facilities that will revert to another purpose in the longer term. We would question whether any park and ride facility would attract persons travelling to Boucher Road. The existing Sprucefield service travels to the City Centre and is unlikely to be attractive to patrons or employees wishing to go to the Boucher Road area.
The issue of air quality was raised with reference to European Directives and the fact that the Council had declared an air quality management area for the entire M1/Westlink corridor. We fail to see how the diversion of some traffic to this proposed facility next to a motorway will have any significant impact on air quality other than in a very localised manner. The implementation of the proposal would be subject to statutory processes. This would include an evaluation of the impact of the proposal on air quality, taking into consideration the air quality management area. Safeguarding the site in the Plan would not in any way pre-judge these issues or circumvent the statutory legal processes that must be followed. The wider benefits of the scheme must be weighed against more localised impacts, in environmental terms. We consider that the concerns of the objector have not been sustained and that the Plan should not be changed as a result of this objection.

**Designation BT 016 – Area of Parking Restraint Belfast City Centre Fringe Area**

Whilst objection 2760/27 refers to Designation BT 016, the issues and evidence relate primarily to a relaxation in parking restriction for convenience retailing. This is a matter related to the Policy provision for APRs which is found in Policy TRAN 4. We have considered objections to Policy TRAN 4 in Part 1 of our report.

We do not agree that the Designation can be contingent on the implementation of the public transport schemes in the Plan. The objection did not say which schemes are involved, as some have little to do with city centre parking. Many public transport proposals and schemes are not in the Plan because they have no land use implications. The APR is also based on shared use of city centre car parking. There may be effects on peripheral locations outside the APR, but one has to draw a boundary somewhere. There are other controls available to address specific problems should they arise. For example, retailers can impose restrictions on their own private car parks outside APRs and residents parking can be introduced.

The objection from QUB (1807/18) did not identify any locations to be added or removed from the APR and no submission was made. There is no comment that we can make on this objection. Objection 3731 requested the exclusion of the Sirocco Works from the APR. There was no basis for the objection and no submission. The site is actually within the City Centre and we consider that the removal of this site from the APR would not be appropriate given its very central location.

Belfast Harbour Commissioners (objection 2015) objected to the exclusion of Titanic Quarter from the Designation on the basis of proximity to the City Centre and the improvements to public transport serving the area. It could be argued that this issue was dependent on the success of their objection to the exclusion of Titanic Quarter from the City Centre. We have reached a view that it should be excluded from the City Centre. We shall consider the objection as a stand-alone issue for the sake of completeness.

Policy AMP 7 of PPS3 does not provide for the designation of APRs in development plans. This matter is addressed in paragraph 4.11. We agree that Titanic Quarter is in a relatively central location. We do not have the necessary information to assess the level of bus services at the moment. We are aware that the CITI-route has severe
difficulties with implementation. The location is not sufficient in its own right to justify an APR. A central location would equally apply to other areas around the designation that have not been included. We note that the transport assessment process allows for reductions in parking standards to be applied in appropriate accessible locations. We are aware that the development so far in Titanic Quarter has been the subject of reduced parking provision. Accordingly we see no impediment to the application of reduced standards in the area in the future as part of the transport assessment process and we therefore do not consider that Titanic Quarter should be included in the Designation. We recommend no change to the Plan as a result of these objections.

**Objection to the failure of the Plan to include a proposal for a Rapid Transport System in North Belfast**  
(Objection 2965/102)

Belfast City Council argued that the Plan should address the need for a rapid transit proposal for the “northern corridor”.

We note that the rapid transit proposals in the Plan all emanate from the BMTP, which does not include a scheme for north Belfast. Given this, no such proposal could be included in BMAP.

The Department stated that a proposed ‘NWay’ had been considered during the development of the BMTP but it was concluded that the proposal should not be taken forward.

We recommend no change to the Plan as a result of the objection.

**Objection seeking introduction of a Residents Parking Scheme in the Holylands**  
(Objection 595/1)

It was argued that a residents car scheme should be introduced to maintain the distinct character of the area and prevent it being overrun by cars belonging to Queen’s University students and staff.

Residents parking initiatives are a matter for Roads Service and their introduction lies outwith the ambit of the Plan. We cannot recommend any change thereto as a result of the objection.

**Objections to the BMTP Strategy and the lack of proposals for:**  
(i) Upgrading of Belmont Road between Massey Avenue and Ballymiscaw Road,  
(ii) A link between Holywood Exchange and the Kinnegar Road system, and,  
(iii) Rationalisation of right turns on the A2  
(Objections 1529/3-5)

As we have already stated, BMAP is not the appropriate forum for amending the content of the BMTP. The roads proposals in this Plan emanate from the BMTP and not
vice versa. As such, the merits of the suggested schemes are not a matter that we can consider further.

RETAILING

DESIGNATION BT 017 DISTRICT CENTRES IN BELFAST

BT 017/1 - Connswater
(Objections 2760/66 & 3716)

The objections sought the inclusion of additional lands within the District Centre designation. This comprised an area of retail warehouses and commercial uses adjoining the centre and sharing the same access road and car parking. Bloomfield commercial centre, a filling station and East Belfast Enterprise Park were also suggested for inclusion by objection 3716. We note that the lands north of the Newtownards Road, which were included in the original objection site, were not pursued further. We take this to mean that that part of the objection site was withdrawn.

We concluded in Part 1 of our report that city and town centres were the preferred location for major retail proposals. District Centres have a role to play but that should be a supporting role. We also acknowledged that some District Centres in the BMA contain a level of retailing that extends well beyond meeting a local need. We resisted calls to elevate them in the retail hierarchy and concluded that further development at Abbey Centre, Forestside and Bloomfield should be strictly controlled in order to achieve the strategic objectives of promoting the role of city and town centres.

In this strategic context, we generally conclude that the boundaries of District Centres should be controlled. Their expansion could be justified to include retail units serving a local need but that does not arise in this case. Arguments that the units within the designated centre do not meet the criteria in paragraph 49 of PPS 5 do not justify inclusion of the objection lands which perform a different retail function.

The designated District Centre includes the covered shopping mall (and Tesco store) and the adjoining car park together with two retail warehouses, a mobile phone shop and the Wyse Byse store. Much of the debate focused on the area of retail uses around the designated centre. The excluded area contains a bank, video store, fitness centre, several restaurant/take-away units, a Lidl foodstore and several bulky retail units in two separate blocks. There are several access points to the wider centre, but the designated centre and objection sites do share the road network and some car parks.

Several of the units contain uses that are specifically referred to in PPS5 as appropriate in a District Centre: for example, the food store and the bank. However, the majority of the objection site contains retail warehouses. They do not provide convenience retailing or shops whose primary function is to meet a local need. There is no policy support for individual retail warehouses or retail warehouse parks to locate in District Centres. Neither PPS 5 nor our strategic conclusions on retailing in Part 1 of the report favour the inclusion of the objection sites in the District Centre. If they were included.
PPS5 would afford them the same protection as existing centres. The status of floorspace conditions limiting the minimum size of the existing units and the range of goods to be sold could also be challenged on the basis that units were now inside the District Centre. We consider that the ramifications of such inclusion could undermine the Plan’s objective of promoting the role of city and town centres. The inclusion of the objection lands as a separate retail warehouse area within the District Centre would be pointless as it would not change the status of the area in retail terms and could lead to confusion.

This District Centre is well served by public transport and is close to large areas of inner city housing. It is therefore in a sustainable location to provide services to this part of East Belfast. The fact that the Mall and retail warehouses and other units share common accesses and car parks means that there is the opportunity for linked trips. The Department accepted this and that the retail warehouses add to the offer available in the District Centre. We do not consider that this is an issue related to room for the centre’s expansion. PPS5 allows for convenience shopping and retailing meeting a local need on lands adjoining a District Centre. Having said that, we note the retail study did identify a need for a modest amount of additional convenience and comparison shopping at this centre. The Department considered that need could be met by the designation in the Plan.

We consider that the adjoining retail units in use for convenience retailing and for the provision of local services could have been included in the District Centre. However, we have concluded that the retail warehouses should not be included in the District Centre and that the large-scale expansion of District Centres should be avoided. They are not sufficiently proximate to the main body of the Centre to justify inclusion. In any case, they were not the subject of individual objection but formed part of the much larger site.

We are aware of areas of retail warehousing being included within the designations of other District Centres. We also note the Departmental concessions that brought even more retail warehouses within the District Centre boundary at Abbey Centre. We are not persuaded that contrary decisions elsewhere, or poor development management decisions, should justify a repetition in other locations or constrain the proper planning of this area. The inclusion of some retail warehouses in the Connswater District Centre designation is logical in relation to the inclusion of retail uses at the Bloomfield Avenue/Newtownards Road junction.

For the sake of completeness we shall address the other parts of the site that have not been discussed thus far. Bloomfield commercial centre and East Belfast Enterprise Park are not in retail use and should not be included within the District Centre boundary. They are also physically separate from the District Centre. The filling station is not necessarily a retail use associated with District Centres. It is across the road from the centre. We consider that it is functionally and physically separate from the centre and should not be included.

The adjoining Commercial Node (AR03/13) on the Newtownards Road arterial route was partly included in the amended objection site. It related to the properties south of Newtownards Road that are within the Node. It must be considered whether all or part of this area should be included in the District Centre. The Department’s stance was
that they should be excluded in order to stimulate regeneration of arterial routes. In the light of our conclusions above, we agree with the Department that inclusion of these additional lands within the District Centre is not justified or necessary. They should remain within the Commercial Node only.

We recommend no change to the Plan as a result of these objections.

**BT 017/2 – Hillview**  
(Objections 3801 & 2965/147)

Objection 3801 sought that 3 areas of land should be added to the District Centre designation. The objection was not supported by any justification of the need for additional lands to be so designated. We note that dwellings are under construction on the white land to the rear of the District Centre, which was one of the objection sites. The existing centre is under-performing and currently all the units are vacant. We therefore agree with the Department that there is no justification for extending the boundary to include additional land. In the absence of any case for the objector we recommend no change to the Plan as a result of this objection.

**BT 017/3 – Kennedy Centre**  
(Objection 1957)

The objection relates to two areas of land to the north and south of the designated centre. The objection sites are designated shopping/commercial areas in the draft Plan, for the most part. The Department confirmed that the centre has received planning permission for re-development and extensions, which includes both pieces of land. They recommended that the objection sites be included within the designation because of the extant planning permission. We agree with this recommendation as it is logical to include the entire centre within the designation. The planning permissions have been implemented and works are nearing completion. It is surprising that this was not done in the course of the draft Plan preparation.

**Recommendation**

We recommend that objection site 1957 be included within designation BT 017/3 – Kennedy Centre.

**BT 017/5 – Westwood Centre**  
(Objections 3035 & 3040) – also related to Employment Zoning BT 011/30

These objections from the same objector argued that part of employment zoning BT 011/30 should be included within the District Centre designation. This District Centre is in close proximity to Kennedy Centre (BT 017/3). The only case advanced was that the adjacent industrial area was run down, physically constrained and not worthy of protection. The needs of the area would be better served if it was included in the District Centre, it was claimed. We do not consider that this represents sufficient justification to warrant the expansion of the District Centre. We have agreed above that the adjoining Kennedy Centre should be expanded. We were presented with no
evidence that the two centres are not sufficient to accommodate the needs of the area. We also consider that the existing employment zoning is warranted in order to meet the employment needs of the area. The units were not vacant and appeared to be well used. We therefore recommend no change to the Plan as a result of these objections.

**BT 017/6 - Yorkgate**
(Objections 2760/20 & 3802 - Exclusion of lands from the District Centre)

Objection 2760 related to a small area to the west of the District Centre designation (abutting North Queen Street) and the public highway of Brougham Street to the north. The Department considered that the area to the west should be included as it appeared to form part of the operational area of the centre. We agree with this assessment and consider that this service yard should be included. We see no justification or need to include a road within a District Centre boundary.

Objection 3802 relates to an area on the opposite side of York Street, between it and the railway line. It contains a new 6 storey building in use as a golf centre on the ground floor and trade union offices above. The remainder of the site is vacant and derelict. It is physically separated from the District Centre by a major 4-lane highway. Pedestrian links to Yorkgate are therefore poor. We consider that the site is physically and functionally separate from the District Centre. We therefore recommend that the objection should fail.

**Recommendation**

We recommend that the service yard to the west of the District Centre identified in Objection 2760 be included within designations BT 017/6.

**OBJECTIONS SUGGESTING ADDITIONAL DISTRICT CENTRE DESIGNATIONS**

**Shore Road**

**Objection 3767**

See BT 011/06

**Objection 2965/130**

The original objection referred to the existing Safeway store not being identified. We have addressed this area under objection 3767. The other element of the objection related to lands at Loughside. This is between Shore Road and the M2, immediately north of the Fortwilliam off-slip. The site comprises a park and Loughside recreation centre, a terrace of dwellings, a sewage pumping station and an area of wasteland to the north of the site. There is a current undetermined planning application on the site for a retail and residential development. We must assess the situation as it currently stands. There are no retail units on the site and therefore it cannot be designated as a District Centre at the moment. We make no predictions of future events, as that is not
our role in this plan. We recommend no change to the Plan as a result of this site-specific element of the objection.

OFFICES

Objections to Designation BT 018 Queen's University Office Area

Objection 906/2
This was an objection by EHSSB to the inclusion of nos. 15-43 Lisburn Road within the designation on the grounds that the buildings may be required for healthcare purposes. This appears to be based on the false assumption that only office use will be approved within the designated area. This is not the case and healthcare use will be considered as part of the development management process should the health board decide that the buildings are required for that use.

Objection 1807/19
This objection from QUB referred to the precise boundary of the designation. However, no details were supplied of any areas of concern. We cannot therefore consider this objection. We note that at the strategic stage the Department agreed some flexibility for University offices and research and development uses within the entire campus. It may well be that this has addressed the University’s concerns.

Objection 1943
The objection refers to the designation and policy OF5 as unnecessary restrictions on commercial development of this important part of Belfast. The objections to OF5 were considered in Part 1 of our report. The deletion of the designation in its entirety is not justified and would not assist the resolution of the objector’s concerns. Deletion would mean that no office area would be defined within which policy OF5 would apply. There would therefore be no favourable context for any office development. The objection did not explain why the designation should be altered or deleted. We recommend no change to the Plan as a result of the objection.

Objections to Designation BT019 - Stormont Office Node

Objection 2693
The objectors do not provide any evidence or basis for the objection. We considered that policy OF6 relating to Stormont Office Node was justified. There is no basis to consider this objection to the consequential designation and we can make no further comment on the objection.
URBAN ENVIRONMENT

OBJECTIONS TO CONSERVATION AREAS
(Objections 130, 293, 462, 589, 840, 1377, 2567, 3138, 3140, 3226, & 3825)

Objections to the specific Conservation Areas referred to the Additional Design Criteria and objected on grounds either, that they are over restrictive, or that more should be added. We have recommended that Policy UE 2 is deleted from the Plan. There should therefore be no additional criteria for any of the Conservation Areas within the Plan. The designation of Conservation Areas is not part of the development plan process and we are unable to deal with any objections to the boundaries of any of the Conservation Areas.

OBJECTIONS TO AREAS OF TOWNSCAPE CHARACTER

Objections to ATCs in Belfast – Designations BT030 – BT 080.
Our recommendations in Part 1 included that Policy UE3 should be deleted and a detailed character analysis undertaken and design guide produced for each individual ATC. This document should be produced in the form of supplementary guidance to the Plan. In light of this we will not comment any further on objections to either the key features of the ATCs or the key design criteria proposed. We will therefore only consider specific objections to the boundaries of each ATC.

Objections to all ATC Designations
(Objection 3789)

This objection referred to all ATC designations in Belfast. Whilst the objection stated that none of the proposed ATCs were justified in whole or in part, no specific arguments were presented that would enable our further consideration of the matter. We recommend no change to the Plan.

ATC Designations and CA Policy
(Objection 2760/30)

This objection relates to the impact of the Plan on Conservation Areas and designation of all Areas of Townscape Character in Belfast, arguing that they lack flexibility, leave little room for innovative designs, and do not respect the commercial realities of retail design. These issues are addressed in Part 1 of our report. The objection raises no site-specific matters for our further consideration. We recommend no change to the Plan as a result of these objections.

QUB Objections 1807/20-28

This objection related to the precise boundary designations of the following ATCs: BT059 Lower Lisburn Road; BT067 Rugby Road; BT071 Stranmillis Riverside; BT072
Stranmillis Village; and BT077 Wellesley Avenue/Keir. The submission referred also to an objection to the precise boundary of Designation BT095, Stranmillis House (College) Historic Park, Garden and Demesne.

We were not furnished with any site-specific details that would allow our further consideration of the objections.

**BT032 - Belmont**  
(Objections 363/2, 3055)

Objection 3055 was to the general extent of the ATC and to the inclusion of 484 Upper Newtownards Road. Demolition has occurred on this objection site and only hard standing remains. The objection site is on the Upper Newtownards frontage and is currently used as a car wash. Whilst in its present state it does not contribute to the ATC, we consider that it falls naturally within the surrounding context of the ATC. We consider that it should be included within the ATC so that any development proposals which come forward would be required to be responsive and sensitive to their immediate context and the wider ATC. We consider that exclusion of the objection site from the ATC would be illogical.

With regard to the objection to the general extent of the ATC, we have considered the information provided by the Department including consultant’s reports and conclude that the designation is merited. Objections to the design criteria were addressed in Part 1.

Objections that the ATC was over extensive and should be significantly reduced did not identify any buildings which should be excluded or where the designation should be reduced. We are therefore unable to consider this objection any further. We recommend no change to the Plan.

**BT033 - Botanic Avenue**  
(Objections 1217/1, 3037/1, & 3042/1)

Objectors sought the exclusion of 34-36 Cromwell Street from the ATC designation. The Tara Lodge Hotel has been constructed on the site, adjacent to existing number 34 which is the end terrace. The new hotel generally respects the attributes of the ATC, such as the urban grain, building lines, heights, fenestration patterns and materials. We consider that this development and the existing No. 34 contribute to the qualities of the wider ATC and merit inclusion. We consider that the objection site is an integral part of the ATC. In addition, we consider that exclusion of the site would result in an illogical boundary for the ATC. The designation does not preclude development within the ATC and has not had a detrimental effect on development of the site.

Objection 3042 sought the removal of the ATC designation however the basis for its removal was not stated. We have considered the information provided by the Department including their consultant’s reports and carried out site inspections of the ATC and conclude that the designation is merited. We recommend no change to the Plan.
**BT035 - Cherryvalley**  
(Objections 1940/2, 342/1)

We note that on objection site 1940 (housing zoning EB/03/24) construction has taken place and we see no reason to exclude it from the ATC.

Objection 342 sought the exclusion of Nos. 9-11 Cherryvalley from the Designation. The objector did not state why the objection site did not merit inclusion within the ATC. We note that one of the key features listed for the ATC is large plots with mature gardens surrounding large dwellings, set well back from front boundaries along the southern side of Cherryvalley Road. We consider that the objection site represents a key feature of the Designation and falls naturally within its surrounding context. We consider that the objection site is an integral part of the ATC and merits inclusion. We recommend no change to the Plan.

**BT037 - Circular Road**  
(Objection 3143/2)

This objection was to the inclusion of housing zoning EB03/07 in the ATC. The objector did not state why the site did not merit exclusion from the ATC. We agree with the Department that the objection site falls naturally within the ATC, which includes the setting of the listed Somme Hospital and grounds. We note that the site has numerous planning approvals and most of these appear to have been implemented – including the ‘Walled Garden’ development, which we consider to be a sensitive and responsive addition within the ATC. We recommend no change to the Plan.

**BT041 - Donegall Road (Village), BT069 – Shankill, and BT080 – Woodvale**  
(Objections 3825/57)

The assertion that these ATC designations would cause conflict with NIHE’s redevelopment and regeneration proposals for these areas is not a reason to delete the ATC designations. We are satisfied that the designations would not impose an embargo on improvements. As we are only considering specific objections to the boundaries of ATCs we are unable to comment any further. We recommend no change to the Plan.

**BT 043 - Falls/St Marys**  
(Objection 906/3)

The EHSSB objected to the inclusion of the northern and western edges of the Royal Hospital Complex within the ATC as the designation may not allow the size and scale of development needed to provide health care facilities.

No plan was provided identifying the lands in question and we are thus unable to further consider the matter. In any event, the designation of an ATC would not necessarily preclude proposals for larger buildings if material considerations indicated that these were appropriate. The needs of the Health Service would be an important factor in the
consideration of a development proposal. We recommend no change to the Plan as a result of the objection.

**BT044 - Finaghy**  
(Objection 147/1)

This objection sought the removal of No. 21 Finaghy Park Central from the ATC as it was claimed that it was not in keeping with the rest of the proposed area. No. 21 is a large house with outbuildings with generous boundary planting set within a significant plot. The mature boundary landscaping contributes significantly to the ATC. The Character Appraisal states that the area covered by the Finaghy ATC represents a coherent layout of consistent character of late Victorian and Edwardian 2 and 3 bay, two storey detached and semi detached houses and bungalows. Finaghy Park Central is the main thoroughfare. There is variety in the elevational forms. This variety in design is balanced by unifying elements such as broad consistency in scale, massing and wall facing and roof materials. We note that in its Character Appraisal the Department refers to a notable example of the housing in the area as the ivy clad no 21 with its small paned, timber sliding sash windows, square and canted bays and gabled porch.

We conclude that the objection site merits inclusion within the ATC. We do not accept that it is not in keeping with the rest of the proposed area. We therefore recommend no change to the Plan.

**BT045 - Fruithill Park**

See objections to Housing zoning WB03/05.

**BT043 (Falls/St Marys) BT046 (Glandore Gardens), BT057 (Lower Cavehill Road) and BT058 (Lower Cliftonville)**  
(Objections 1494/6, 7, 8, & 9)

Whilst these objections refer to designations BT043, BT046, BT057 and BT058, the arguments presented relate to the Plan’s strategy in respect of ATCs, generally. We cannot discern any site-specific issues that have been raised in respect of the subject designations. We recommend no change to the Plan.

**BT050 - Holyland**  
(Objections 106/2, 430/2 & 17, 458/1, 595/3, 698/6, 812/1, 1377/2, 1724/5, 2862/4, 3169/1, 3183/1)

Objectors sought the extension of the ATC to include Stranmillis Embankment rather than only to Collingwood Road as views to and from the river are integral to the character of the Holylands area. At the Inquiry the Department conceded that the ATC should be extended to the edge of the River Lagan and include the Stranmillis Embankment. We endorse this.
Objection 3183 sought the exclusion of an extensive site at the junction of University Avenue and Ormeau Road. Part of the objection site has been developed as 3 storey apartments around a central parking court. The remainder of the objection site is the H & J Martin office building on the Ormeau Road with accommodation and yards to the rear. The objector does not state why the objection site should be excluded from the ATC. We consider that the new development respects the attributes of the Holylands ATC, such as the urban grain, buildings lines, heights and materials. We consider that this development contributes to the qualities of the wider ATC and merits inclusion. We agree with the Department that the H & J Martin building (constructed c 1879) exhibits sufficient architectural character and intrinsic qualities, based on historic built form and layout to warrant inclusion within the ATC. We consider that this extensive site falls naturally within the ATC and is an integral part of the overall designation. In addition we consider that the exclusion of the site would create an illogical boundary for the ATC.

There were also general objections to the Designation. We have considered the information provided by the Department including their consultants’ reports and visited the area and conclude that the Designation is merited.

**Recommendation**

We recommend that the southern side of the ATC is extended down to the River Lagan to include the Stranmillis Embankment.

**BT052 - Innisfayle**

(Objections 2817/1, 3060/1)

Objection 2817 relates to a residential plot at what was No.26 Parkmount Road. Objection 3060 relates to a site on the northern side of the junction of Downview Avenue with Antrim Road. Both objections were to the inclusion of the sites in the proposed ATC and to the applicable key design criteria in Policy UE3.

We note that both sites have been redeveloped and that the design and finishes of the new units would appear to have taken account of the proposed ATC designation. As such, they are in keeping with the character of their respective localities. Exclusion of either site would create an unnatural and unnecessary gap in the boundary of the ATC. We recommend no change to the Plan as a result of these objections.

**BT054 - Lagan Village**

(Objection 2846/1)

This objection sought the removal of a long narrow parcel of land between Park Parade and the Ormeau Embankment. The site was previously a faculty of the Belfast Institute. We note that the site is cleared and levelled with perimeter hoarding in place.

There is planning approval on the site for an office development with car parking. The Department conceded that there may be merit in exclusion of the site given the planning approval on the site.
In its present state we agree that the objection lands do not contribute to the attributes of the ATC, which refer specifically to the terraced housing to the north of the objection site. Given the planning approval for office development and its location on the southern edge of the ATC, we consider that the objection site should be excluded from this ATC designation.

**Recommendation**

We recommend that objection site 2846/1 is excluded from the Lagan Village ATC.

**BT056 - Lisburn Road**
(Objections 344/3, 1724/6, 2760/29 & 67, 3463/1)

Objection 3463/1 objected to the inclusion of 147 Lisburn Road with the ATC. We note that 147 Lisburn Road on a corner site has been recently developed and is now a fish and chip shop. The objector did not say why the objection site should be removed from the ATC. The objection site lies into the ATC and its removal would result in an illogical boundary for the overall extensive designation.

We do not agree with Objection 344/3, that the ATC objectives are incompatible with the development of the Lisburn Road Frontage which will involve the demolition of older buildings unsuited to modern requirements, as the designation does not preclude demolition and sensitive redevelopment. We do not agree with the objectors that the objectives of the ATC can be met without including the Lisburn Road frontage, as we consider the frontage buildings to be an integral part of the overall designation.

The designation does not preclude development within the ATC, nor innovative design solutions. We fail to see now the designation does not respect the commercial realities of commercial design. We recommend no change to the Plan.

**BT057 - Lower Cavehill Road**
(Objection 477/1)

This objection is to the inclusion of the site at (what was) No.205 Cavehill Road within the proposed ATC. We note that the site appears to have been redeveloped, the new buildings incorporating finishes and design elements that mirror those of adjacent properties within the proposed ATC. Exclusion of the site would create an illogical boundary for the edge of the ATC and we see no reason to exclude it from the proposed designation. We recommend no change to the Plan as a result of this objection.

**BT060 - Lower Ormeau, BT071 - Stranmillis, BT072 - Stranmillis Village, BT056 - Lisburn Road.**
(Objection 1724/7)

This objection from the University of Ulster stated that the Plan should provide for more proactive public consultation between planners and the community on ATCs and...
Conservation Areas as well as for the extension of such schemes to Stranmillis, Lower Ormeau and the Lisburn Road. This is an objection to the plan process rather than a site specific objection to any of the ATCs. We are unable to comment any further on this objection and recommend no change to the Plan.

**BT065 - Ravenscroft Avenue**  
(Objection 2760/67)

We fail to see how the designation of Ravenscroft Avenue ATC, would stagnate the potential for improvements to Connswater Shopping Centre as claimed by the objector, as this large shopping centre complex is completely outside the designation. For the reasons set out by the objector, we agree that the inclusion of Greenville Street and the area to its rear within the ATC is illogical. We consider that the area bounded by Greenville Street, Greenville Avenue, Beersbridge Road and Bloomfield Avenue adds little to the overall integrity of the ATC and should be excluded from the designation. We recommend accordingly.

**Recommendation**

We recommend that the area bounded by Greenville Street, Greenville Avenue, Beersbridge Road and Bloomfield Avenue should be excluded from the ATC designation.

**BT066 - Rosetta**  
(Objections 1469/3, 3560/3)

Objection 1469/3 stated that Rosetta School should be included within the ATC. Since the Rosetta Primary school is included within the boundary of this ATC, there is no foundation to the objection.

**BT067 - Rugby Road**  
(Objections 595/1, 698/4, 1225/1, 1377/4, 1641/1, 2862/1, 3008/1)

Objection 595 sought the inclusion of various properties within the ATC.

The boundary of the Designation is based on the form, character and layout of the buildings on either side of Rugby Road. We consider that the objection properties which address Fitzroy Avenue, University Avenue and College Park Avenue relate to and address these thoroughfares and therefore lie contextually and appropriately with the Holylands ATC rather than the Rugby Road ATC. Botanic Primary school is already included within the ATC.

In terms of urban grain it would be more logical for the inclusion of Rugby Mews and Square within the Rugby Road ATC as they relate to the built form, in terms of footprint and scale, of Rugby Street/Parade and hence lie more naturally into this context. In addition, we agree with the objectors that as these properties are assessed from Rugby...
Street and Rugby Parade (off Rugby Road) within the ATC, it would be more logical to incorporate them within Rugby Road ATC, rather than the Holylands ATC. Objections that this designation has not been included for Conservation Area status as a priority alongside the Holylands cannot be addressed as it is not within the remit of this Plan to designate any Conservation Areas.

**Recommendation**

We recommend that Rugby Mews and Rugby Square are included within Designation BT 067.

**BT070 - Stockmans Lane/Mooreland Park**  
(Objection 482/1)

This objection was to the inclusion of 80 Andersonstown Road within the ATC as the objector claims that the large detached property does not relate in visual terms to the ATC. We note that the site has been redeveloped for apartments and that the scale, design and finishes of the development would appear to have taken account of the proposed ATC designation. As such, they are in keeping with the character of the ATC. Exclusion of the objection site would create an illogical gap in the ATC boundary. We recommend no change to the Plan as a result of this objection.

**BT076 - Upper Malone**  
(Objection 3135/1, 2334)

The objection included a plan identifying lands at Brackenwood Lane, which lie within the ATC. The objector has not clarified the actual objection regarding these lands and we are unable to consider it any further. We recommend no change to the Plan.

**Proposed New ATC Designation at Crumlin Road**  
(Objection 130/8)

This objection advocates the designation of that part of Crumlin Road adjacent to the Court House and Jail as a Conservation Area or ATC, given that the area from Crumlin Road to the bottom of Donegall Street contains some of Belfast’s prime Victorian public buildings.

We reiterate that designation of a Conservation Area is outwith the scope of this Plan. With regard to the suggested new ATC, we consider that parts of the objection lands could be justified as an ATC but the Department would be required to carry out a detailed analysis of the area.

**Recommendation**

We recommend that the Department carries out a detailed analysis of the objection lands with a view to the possibility of designating an additional ATC.
OBJECTIONS TO PROPOSED HISTORIC PARK, GARDEN AND DEMESNE DESIGNATIONS

BT084 – Botanic Gardens
(Objections 1311/5, 1359/3, 2965/26)

Objection 1311 sought the inclusion of the QUB Physical Education Centre (PEC) and the Ulster Museum and their associated car parks as the whole area forms historic parkland and is used by the public as a single entity. It also sought the extension of the park boundary to the river edge. BCC sought the exclusion of land to the south west of the PEC. Notwithstanding the arguments about use of the car park, we have considered the boundaries of the Designation and conclude that it is merited as shown in the draft Plan. It should not be extended to include the built development on the objection lands or the lands down to the river edge as they do not fall naturally into this Historic Park designation, nor should it be reduced to exclude lands to the south west of the PEC. Regarding the objectors concerns that the Park is at great risk from development around the PEC, regional policies will apply to ensure protection of the open space around the Park.

With reference to concerns about the quality of the residential areas surrounding the parks and approaches within these areas to the Park, we note that these areas are within various ATC designations which will ensure sensitive responsive development and protection of important vistas and views to the Park.

Design issues raised, such as closing the road along the Stranmillis embankment, removing railings and creating more entrances, are outside the scope of the Plan. We recommend no change to the Plan.

BT095 - Stranmillis House
(Objection 1807/28)

QUB objected to the boundary of this designation however no land was identified for inclusion or exclusion and we are unable to consider this objection any further. We recommend no change to the Plan.
NATURAL ENVIRONMENT

GENERAL

Objection to lack of policy for enforcing planning conditions protecting trees on development sites
(Objection 2965/112)

This objection from Belfast City Council is a general issue rather than one relating to a specific site. The Council’s concern stems from the lack of protection afforded to trees where no TPO is in place; it sought a commitment from the Department to carry out a survey of trees and to protect these using TPOs. It was argued that the BUAP policy L6 should have been carried through into BMAP.

Policy L6 sought to establish a Belfast Urban Forest and we see no need for it to be repeated in BMAP.

The value of trees in the urban environment is recognised throughout regional and Plan policy. In BMAP, important groups of trees are often afforded protection through designation as LLPAs or, where nature conservation interests exist, SLNCIs. Development proposals in such areas would be required to take important trees into account. Legislation exists to impose TPOs to protect trees in the interests of amenity and we fail to see what a policy in the Plan would add since it could relate only to planning proposals. We cannot recommend the adoption of a policy relating to enforcement of planning conditions, which is ultimately a development management issue. We see no harm in the Department’s offer to refer to the importance of trees and their protection in the Plan. Surveying trees with a view to imposing TPOs is not a matter for this development plan.

OBJECTIONS TO PROPOSED SLNCI DESIGNATIONS

Note: For BT102/04, BT102/13, and BT102/20 - see chapter on LVRP Objections.

BT102/12 - Cave Hill/Collinward
(Objection 2145/14)

The objector submitted that the SLNCI should be extended to include the lower slopes of Cavehill Country Park between the housing and Belfast Castle; however, we were not presented with any detailed information on the nature conservation value of the area that would enable us to consider the merits of the argument. We note that LLPA BT108 would appear to include the lands in question. We recommend no change to the Plan as a result of the objection.
**BT102/14 - Crumlin Road/Upper Hightown Road**  
(Objection 3628/20)

This objection was to BT102/14 “as it affects the subject site”. We note that the objection site lies outwith the SLNCI and the objector has not provided any information to explain the concerns with the designation. We therefore recommend no change to the Plan as a result of the objection.

**BT102/15 - Dunmurry Schools (also to AOCMD)**  
(Objection 1743/2 & 4)

See LVRP section of our report.

**BT102/17 - Land at Stranmillis and Riddel Hall**  
(Objections 1807/16, 2145/10, 2965/47)

The objection from QUB was to Designation BT 102/17. The University argued that the site is appropriate for University-related development. The Forest of Belfast argued that all the areas of mature woodland within the grounds of Stranmillis and Riddel Hall should be included within the SLNCI. BCC agreed on this point and provided a map showing the suggested amended extent of the SLNCI.

The fact that the university considers that the site is suitable for development is no justification for deletion of the SLNCI. The designation would not preclude sensitive development and we do not accept that the SLNCI should be deleted from the Plan.

The Department conceded an extension to the SLNCI, largely in accordance with Belfast City Council’s suggestion. We see logic in the Department’s stance, given the similarity between the suggested additional lands and those within the draft Plan’s proposed designation.

**Recommendation**

We recommend that SLNCI BT102/17 is extended as per the attached PLAN 3.

**BT102/18 - Inverary SLNCI**

See section on Belfast Harbour

**BT102/22 - Ligoniel**  
(Objections 2145/12, 2850/5 and 2965/50)

Objection 2850/5 is dealt with under existing employment zoning BT 011/12.
Objections 2145 and 2965/50 argued that the upper section of the river valley, north of Wolfhill Avenue bridge, should be included in the SLNCI. The map submitted by BCC reflected its view that the SLNCI should also include the old Wolfhill Mill site immediately north of Wolfhill Grove. It was argued that the basis for the designation of Ligoniel Village SLNCI includes woodland, scrub, grassland, open water and watercourse habitats. The proposed extension to the SLNCI would include species rich grassland and scrub similar in habitat to that contained within the proposed SLNCI in the draft Plan. The objection pointed out that the proposed extension would link the two areas of SLNCI identified in the draft Plan and ensure maintenance of a wildlife corridor from the urban environment through to the open countryside.

The Department conceded the extension of the SLNCI to include an area to the rear of the existing dwellings fronting onto Mill Avenue, but excluding the land north of Wolfhill Grove and the area enclosed by the sharp ‘bend’ in Mill Avenue. We are aware that planning permission has been granted for housing within these areas, which will render them unsuitable for inclusion within a SLNCI and effectively cut off any linkage between the two separate parts of BT102/22. We see the logic in the extent of the Department’s concession and therefore endorse same.

Recommendation

We recommend that SLNCI BT102/22 is extended as per the attached PLAN 4.

BT102/25 - South of M1 Junction 1
(Objections 906/13, 1587/2, 2965/27)

Objections 906/13 and 1587/2 from the EHSSB and the Green Park Health and Social Services Trust, respectively, were based on the grounds that the land may be needed for a second access to Musgrave Park Hospital from Stockman’s Way, as recommended in Health Building Notes, or for hospital development. The extent of the designation should therefore be modified accordingly. We were not presented with any plan in respect of these objections.

Belfast City Council argued that part of the designation is in its ownership and has been separated from Musgrave Park by the former defence estate access road. The area to the northwest of the access road and former facility has only limited amenity value. The Council stated that the objection site, which has a frontage to Stockmans Way and comprises vacant/overgrown land, does not currently benefit from any active management and would not be considered to be part of the “main area” of the SLNCI identified in the dBMAP Technical Supplement 11; the explanatory text in the Technical Supplement identifies the main area as being the old elevated tip with scattered scrub cover. The Council does not consider that objection site should be included within a SLNCI as it could be more appropriately utilised for development in conjunction with the adjoining land in Council ownership.

The Council provided no evidence to demonstrate that the nature conservation value of the objection site was insufficient to warrant designation as a SLNCI. The site contains various trees and vegetation and would appear to have significant value in terms of
habitat for flora and fauna; that it is unmanaged land, or close to Stockman’s way, is neither here nor there in terms of its contribution to biodiversity. The fact that the Council considers that part of the site should be developed does not justify deletion of the designation. We accept that the site is on the periphery of the designation, and it may well be that removing the site from the SLNCI would not prejudice its overall integrity; however, this would not justify the amendment sought, given that the site has nature conservation merit in itself. We do not accept that the imposition of key site requirements on the site, in conjunction with its development, would provide benefits to the remainder of the SLNCI such as to warrant its removal from same.

We have no indication of any planning approval having been granted for development within the SLNCI. The Health Service objections gave no indication that there were any proposals for built development within the lands that would allow us to consider the issue further. We agree with the Department that the SLNCI designation would not necessarily preclude provision of a new road to Musgrave Park Hospital. We recommend no change to the Plan as a result of these objections.

**OBJECTIONS SEEKING ADDITIONAL SLNCI DESIGNATIONS**

**Objection seeking designation of a SLNCI – Botanic Gardens**
(Objections 1311/1 & 5)

The Plan proposes that a large part of the Botanic Gardens be designated as Historic Park Garden and Demesne BT084. Although the Plan does not contain policy in respect of such designations, regional policy in PPS6 applies. BMAP also proposes that the entire Park be designated a LLPA (BT145) on the basis of its archaeological, amenity and nature conservation importance and the listed buildings therein. The portion of the Park to the north of the QUB Physical Education Centre is contained within the Queen’s Conservation Area, which was designated under the relevant legislation. Statute requires that development proposals must enhance or protect such areas. BMAP identifies the Park as open space, which also benefits from the protection afforded by PPS8.

Other than a reference to the Park’s horticultural value, which largely relates to its man-made landscape, we were not presented with any specific information regarding the nature conservation features of the Park that the objector considers warrants the designation of the Park as a SLNCI. We consider that the existing designations would ensure an adequate level of protection from inappropriate development and that designation as a SLNCI would add nothing in terms of this issue. We therefore recommend no change to the Plan as a result of the objection.

**Objection seeking designation of proposed LLPA BT107 as a SLNCI – Balmoral Golf Course**
(Objection 959/7)

It was argued that, in addition to its landscape and health value in an area which has seen significant recent built development, the golf course is also known to be of nature conservation importance. It was submitted that the land supports an important bird community including species such as long-eared owl, bullfinch and sparrowhawk, as
well as orchids and an interesting section of alder woodland. Recent moth trapping adjacent to the golf course has discovered many interesting species, including only the second Irish record of the Small Yellow Wave (*Hydrelia flammeolaria*), which is an alder feeder. Two other specimens of this rare moth have also been recorded there. In view of this evidence, Balmoral Golf Course should be designated as a SLNCI.

The objector’s assertions regarding the species present on the site were not disputed. We note that policy ENV3 allows for the designation of LLPAs in areas of local nature conservation interest. The protection afforded to LLPAs by ENV3 is not significantly different from that applied in SLNCIs by policy ENV2. In addition, the golf course is clearly open space that would be protected by regional policy in PPS8. We consider that the objection can be addressed by adding an additional bullet point to Designation BT107, referring to the nature conservation interest of the golf course.

**Recommendation**

We recommend that an additional bullet point be added to designation BT107 as follows:

- Area of local nature conservation interest – golf course providing habitat for various species of flora and fauna.

**Objection seeking designation as a SLNIC - Albert and Queen Elizabeth Bridges**

(Objection 1856/10)

It was submitted that roosting starlings use the supporting structures of the Albert and Queen Elizabeth bridges outside the breeding season. The objector stated that numbers were estimated to peak at around 90,000 birds in mid-winter 2000/2001. For this reason it was argued that the bridges should be designated as SLNCIs.

It is difficult to see how designation as SLNCIs could have any relevance to the protection of these roosting locations. We do not envisage that any development proposals are likely to come forward in respect of either bridge. We are not convinced from the evidence provided that the bridges should be designated as SLNCIs and recommend no change to the Plan as a result of this objection.

**OBJECTIONS TO PROPOSED LOCAL LANDSCAPE POLICY AREAS**

**BT104 - Ardmore**

(Objection 533/1)

The Northern Ireland Transport Holding Company, which owns the majority of the land within the proposed designation, argued that the site is being retained for possible future railway use. It was stated that an application on a small section of the land had been submitted, for the development of 5 new residential units and planning permission had previously been granted for development. It was argued that there was extreme vandalism in the area that has resulted in a reduction in passengers using the station. It
was the objector’s belief that the only way to eliminate the vandalism would be to develop the area where the vandals currently hide out.

We note from the draft Plan that the proposed designation is based on the “Area of local nature conservation interest – Area bisected by railway line containing mature deciduous woodland area”. We observed that the objection site comprises a mixture of rough grassed land and areas containing mature trees. It also includes some partially overgrown hard-surfaced areas of indeterminate use, close to its western and eastern extremes. A double track railway line separates the northern and southern parts of the site.

We were not presented with any detailed evidence regarding the approved development on the site. We are unaware of the outcome of the planning application referred to by the objector. We therefore cannot determine which part(s) of the site the Department may have deemed suitable for development. The objector has not provided any information regarding the possible ‘future railway use’ intended for the site that would enable us to factor the matter into our consideration. As we have already stated, a LLPA designation would not preclude redevelopment of a site, provided that the development would not have a significant adverse effect upon the features for which it is identified. We were not presented with detail as to the extent or nature of vandalism within the site, nor how it relates to Finaghy rail station. In any event, vandalism is common on many areas of amenity and open space and we do not accept that the only solution is to develop such lands.

On the basis of the evidence before us, we are not convinced that the proposed LLPA designation should be deleted from the area controlled by the objector. However, we fail to see how the hard surfaced areas within the proposed designation have any significant nature conservation value; in particular, that area beside Finaghy Road North, on the northern side of the railway lines. We consider that this area should be excluded from the designation.

**Recommendation**

The boundary of the LLPA designation should be amended to exclude the hard-surfaced area adjacent to Finaghy Road North, on the northern side of the railway lines.

**BT108 – Belfast Castle/Fortwilliam. Also to non-identification of land as a DOS**

(Objections 3181/1, 3053/3, 3530/1 & 3)

Objection 3181 was to designation BT108 generally; however, no information was provided that would enable us to consider the issue further.

Objections 3053 and 3530 were confined to the LLPA as it affects the Redemptorist Community lands at Antrim Road. No detailed submissions were made.

The Department indicated that outline planning permission had been granted for residential development and ancillary works on the objection site in May 2007. It conceded that development of the objection lands will have an adverse impact on
landscape quality and the amenity value of the site and will change the landscape and visual character from parkland associated with two locally significant buildings to a denser built form with associated dwellings, roads, lighting etc. Consequently, the LLPA boundary should be amended to exclude part of the objection lands. The Department considered, however, that the areas of woodland within the objection site should remain within the LLPA designation, as should the open space fronting St Clement’s Retreat. We were not provided with maps showing the Department’s proposed amendments to the LLPA.

Given the absence of any detailed argument from the objectors, we have no reason to disagree with the Department’s stance. It would be illogical to include land within a LLPA that failed to merit protection. The counter objector’s comments make no reference to the residential approval on the site.

**Recommendation**

We recommend that the LLPA should be amended as per the Department’s suggestions and the Plan maps amended accordingly.

**BT111 - Belmont Park**

**Objection 56**

Objection 56 submitted that Belmont park and the CIYMS sports grounds were worthy of inclusion within an LLPA, given their contribution to local amenity and nature conservation in the area. It was argued, however, that No. 230 Belmont Road (Barnardos) should be excluded.

On the basis of the information presented by both parties at the Inquiry, we are not convinced that there is a TPO on the site; we cannot therefore, consider the argument that this is a factor mitigating against the need for a LLPA designation.

The trees within the Barnardos curtilage are visible from Belmont Park, Parkway, and Belmont Road and in our opinion, there is a degree of visual linkage with Belmont Park. Whilst we accept the objector’s point that No.230 is an entity that is separated from the adjoining park by a boundary, we do not agree that there is no visual or physical linkage, notwithstanding the buildings along the northern edge of the site. We see no indication in the Plan that all elements of a LLPA require to be interlinked, intervisible, or accessible, one from the other. Neither do we perceive any need for a LLPA to have a public frontage or to contain locally important or listed buildings. We note that, due to the vegetation within the Barnardos site, there is limited intervisibility between the buildings therein and development on adjoining lands to the east, west and south, when viewed from Belmont Road. It is common for LLPAs to contain buildings or to comprise a number of elements within separate curtilages and the objector’s submission that because No. 230 lies adjacent to a block of residential and other development is not, in itself, a reason for exclusion from the LLPA.

We note that BT111 is proposed on the basis of an area of local amenity importance and an “area of local nature conservation interest – mature deciduous trees and groups
of young trees”. In our opinion it is the latter that has resulted in the Barnardos site being incorporated in the draft Plan designation. Notwithstanding the development that has been approved and constructed, the site still contains a significant number of mature trees, younger trees and undergrowth, which undoubtedly have nature conservation interest. We concur with the Department that the approved development, which took into account the proposed LLPA designation, would appear to have been undertaken without significant detriment to the site’s character. We also agree that this demonstrates how built development and LLPA designations are not necessarily mutually exclusive. We disagree with the objector that the site lacks features that warrant an LLPA designation. We do not accept that the designation would serve to introduce uncertainty in respect of future development on the site or frustrate the achievement of SPG-BMA 2 of the Regional Development Strategy which seeks to promote an urban renaissance throughout the Belfast Metropolitan Area. We do not accept that seeking to protect features of local nature conservation importance need necessarily involve designation as a SLNCI.

Objection 567
Objection 567 relates to land within the curtilage of No. 93 Circular Road, immediately adjacent to the CIYMS clubhouse. It was argued that the site does not form part of the adjacent parkland, nor does it lie within the sports grounds of CIYMS; the site has no public amenity or landscape value, and is of no local significance. Accordingly it does not merit protection under the above-mentioned policy.

The objection site is located on the periphery of the proposed designation. The land has been cleared, and the dwelling referred to in the objection has been demolished. We agree with the objector that the site contains no features to justify its inclusion within the LLPA.

Recommendation
We recommend that lands within objection site 56 are retained within the LLPA BT111 and that objection site 567 is excluded.

BT113 - Blanchflower/Patton LLPA

See section on Belfast Harbour.

BT120 - Colin Glen
(Objection 3824/9)

See the Lisburn section of our report, reference ULW ML23

BT121 - Cranmore/Bladon
(Objection 840/1, 244/4)

Our conclusion on objection 244/4 is set out above.
Objection 840 was to the inclusion of the grounds of Victoria College within the LLPA. It was argued that the school grounds are already adequately protected by inclusion within the Malone Conservation Area and no added protection or guidance would be provided by LLPA policy. It was submitted that the Conservation Area designation would provide sufficient control over development and the possible removal of trees. The objection referred to Technical Supplement 6.

We cannot consider an objection to a Technical Supplement, which does not form part of the Plan. We note that there are various locations in the Plan where proposed LLPA designations lie within Conservation Areas. There is no fundamental conflict in such overlapping designations. Notwithstanding this, we must consider the objector’s argument. The purpose of a LLPA designation is to seek to protect the features of merit within the land in question. If an overlapping designation provides a similar, or greater, level of protection, then the need for the designation must be called into question.

The policy for control of new development in a Conservation Area is contained in BH12 of PPS6. Criterion (a) of that policy requires development to preserve or enhance the character and appearance of the area. Criterion (e) protects important views into and out of the area. Criterion (f) protects trees and other landscape features that contribute to the character and appearance of the area. Other criteria seek to ensure that new development should respect built for and buildings in the Conservation Area.

We consider that the visual features identified by the Department, both in the Plan and in the evidence to the Inquiry, which merit the LLPA designation, are also features that are an inherent part of the character and appearance of the Conservation Area. As such, policy BH12 would be adequate in providing a level of protection at least as effective as policy ENV3. However, the Department also referred to the nature conservation value of the trees and vegetation within the objection site. We accept the argument that the proposed LLPA forms an important ‘green space’ and a link through the urban area in terms of biodiversity and wildlife value. This is a matter outwith the remit of Conservation Area policy and could be an important factor in the assessment of a development proposal. In the circumstances we disagree with the objector that the LLPA designation is entirely unnecessary within the school grounds. We therefore consider that the LLPA designation should be retained, but only in respect of the areas of mature vegetation within the site.

**Recommendation**

We recommend that:

- the mature trees and vegetation within the grounds of Victoria College affected by designation BT121 are retained within the LLPA, and,

- the remaining areas, including the all weather pitches and tennis courts, are excluded from the LLPA.
Objection 2855 raised a concern that, as the surrounding areas are zoned for housing development and the realignment of Mill Avenue is crucial to these, the necessary road improvements may be prejudiced by the identification of LLPA BT 125 as an area of existing open space.

The objector provided no details of the works to the road network that would allow our consideration of the matter. In any event, we do not consider that the Plan would contain or promote impediments to the development of housing zonings. PPS8 would not automatically preclude provision of necessary infrastructure. We do not see any need for the Plan to be changed as a result of this objection.

Objection 2851 related to a small part of the proposed LLPA at No.81 Old Holywood Road, which is located on an ‘island’ created by road improvements. The site contains 2 recently constructed dwellings surrounded by a number of mature deciduous trees. These dwellings would appear to have been built subsequent to the submission of the objection. The objection sought deletion of the LLPA designation on the site and stated that the trees thereon are the subject of a TPO and that the visual amenity of the land is therefore adequately protected.

The features that the proposed LLPA designation seeks to protect are: Glenmachan Tower Hotel and its surroundings, and an area of local nature conservation interest comprising two glens with extensive mature woodland. The Plan makes no reference to the amenity value of the trees within the objection site. The new dwellings appear to have been designed and positioned taking into account the presence of the mature trees in the site. The TPO will ensure that the trees are afforded a level of protection in excess of that provided by a LLPA designation, which would not actually guarantee their retention. We see no need for the LLPA designation on the subject land and recommend accordingly.

Objection 905

This was submitted on behalf of PSNI. It sought deletion of the LLPA designation on a very small portion of fenced-off land at the eastern side of the access to the Training College. It was argued that the site is likely to become surplus to needs, the most appropriate redevelopment use is residential and that an outline planning application and accompanying design concept statement had been submitted. It was argued that the portion of the proposed LLPA which fronts onto Garnerville Road is an area of maintained grass of no particular local nature conservation interest; the area is bounded on two sides by mature trees which can be retained as part of any redevelopment proposal for the site.

We would not support deletion of part of an environmental designation merely to facilitate development. In this particular case, we agree with the objector that the small
portion of land in question is of no great amenity value and its exclusion from the LLPA would not adversely affect its function in seeking to protect the features for which its designation is proposed. The Department’s evidence states that the trees within the PSNI site are the subject of a TPO, which will ensure their protection. We recommend accordingly.

Recommendation

We recommend that the LLPA designation be deleted in respect of the land within objection site 2851 and the area indicated in green on the plan submitted with objection 905.

BT131 - Hunterhouse/Wedderburn/Rathmore
(Objections 334/1; 1743/1, 2, and 4; and 1981/8)

Please refer to the LVRP section of our report.

BT133 - Knock Golf Course/Hospital Glen
(Objections 2024/13, 906/10)

As stated by the Department, The objection was to “3Ha of land to the north east of the Ulster Hospital being included in a Local Landscape Policy Area.” There is no LLPA designated to the north east of the Ulster Hospital. Knock Golf Course / Hospital Glen LLPA lies to the north and west of the hospital and no map was included with the objection to identify the site. In the absence of any reasoning or explanation from the objectors, we cannot consider the matter further.

BT135 - Loughview
(Objection 3645/13)

It was submitted that, since Loughside Playing Fields is the subject of an extensive mixed use redevelopment scheme being promoted by Belfast City Council and a private sector partner, BMAP should be amended to support the scheme.

The objector made no suggestion as to how the Plan should be changed, nor was any reasoning put forward to explain why the LLPA designation is not justified. We have stated previously that a LLP A designation does not necessarily preclude development. On the basis of the objection before us, we do not consider that a change to the Plan is warranted.

BT139 - Mountain Hill
(Objection 2855/17)

The objection raised concern that zoning of the land as open space may preclude the possibility of building an approved multi sports play area.
BMAP would not remove development rights conferred by the grant of planning permission. The objector’s concerns are therefore unfounded and we need not consider the matter further. We recommend no change to the Plan as a result of the objection.

**BT140 - Musgrave**  
(Objection 2965/28)

Belfast City Council argued that the objection site has been segregated from Musgrave Park by the former defence estate access road. It submitted that the area to the north of the access road has no recreational potential and limited amenity value and should be removed from the LLPA.

The Plan, on pages 301 and 302, identifies the features that the Department considers to warrant designation of LLPA BT140. There are no objections to the remainder of the proposed LLPA. We note that the Council recognises the value of Musgrave Park as an important landscape element in the south of the city. Around half of the land identified in the objection has been hard-surfaced and would appear to be used sporadically for parking vehicles. Any previous nature conservation value would appear to have been lost within this area. Notwithstanding this, the land is within the boundary of Musgrave Park and is clearly an integral part of same, irrespective of the Council’s contrary opinion. The Park contains other hard surfaced areas and nowhere in the Plan is there an indication that such features as car parks cannot be included in a LLPA. We also note that removal of the land from BT140 would, illogically, leave isolated a small portion of LLPA to the rear of No. 142 Stockman’s Lane, to which there is no objection. We consider that the objection site should remain within the designation and recommend no change to the Plan as a result of the objection.

**BT142 - Orangefield/Dixon/Laburnum Playing Fields. Also to identification as Open Space and seeking a DOS (Residential and Open Space)**  
(Objection 2896)

We have stated our conclusions on the identification of Development Opportunity Sites in part 1 of our report. The objection site is open space and cannot be therefore be described as vacant or under-utilised land. The purpose of designating a DOS is to assist in urban regeneration and it would be inappropriate to identify a DOS at this location when what is being sought is, essentially, a housing zoning.

The site is located to the rear of a petrol filling station and shop on the northern side of Knock Road. It is enclosed by security fencing on all sides. There is a large housing estate to the north and commercial uses to the west. Land to the northwest is in schools use; it sits at a lower level and has recently been laid out as all-weather pitches. The objection site is overgrown at present and does not appear to have any formal use. The only access we were able to identify was via a gap in the fencing at Prince Regent Road. There is evidence of bonfire construction on the land.
The objector stated that the land was previously used as playing fields but has been privately owned since the Belfast Education and Library Board (BELB) sold it in early 1991; it has not been used since the late 1990s. It has not formed part of the pool of available open space in Belfast for many years. In 2003 planning consent was granted to use the old pavilion on the site for warehouses and offices, and in 2004 for redevelopment of the filling station to provide a convenience store, petrol forecourt, jet wash and drive through car wash. We were advised that there was a current planning application to redevelop the site to provide:

- a mixed use retail, office & petrol filling station scheme of the frontage;
- a new junction and road off the Knock dual carriageway to service the new schools on the Orangefield/Grosvenor site;
- extensive landscaping of site to improve visual amenity;
- construction of three small business units.

The DOS was sought to facilitate this development. It was proposed to retain an area of land as part of a potential linear walkway and open space along the rear of the houses to the north of the site.

The objector argued that KSRs attached to a new housing zoning could result in the provision of a new road to the schools complex entirely funded by the developer; this would represent a significant planning gain and would remove traffic from existing residential streets and rationalise/improve the junction of Glen Road with Knock Road.

We do not accept that the development of the objection site would necessarily obstruct the proposed Community Greenway BT 162/06; provision could be made in conjunction with the proposed housing. However, we note that the redevelopment of the school sports grounds has not made any provision for the Greenway. We do not accept that it is significant that BMAP does not designate a ULW at this location since there is no need to separate communities or maintain differing identities.

We accept the objector’s argument that there is no physical continuity in the open space that runs from the urban edge to Orangefield because of the prominent petrol filling stations on either side of Knock Road and the width of Knock Road itself. The security fencing within the schools complex also represents a barrier to free passage. We accept that the formal use of the objection site as playing fields/recreational land has ceased and that the approved new playing fields may be unlikely to be provided. Notwithstanding this, we agree with the Department that there is a strong visual linkage between all of the areas of open space that are contained in the proposed BT142 and BT148 LLPAs. Views exist from Glen road, the golf course, Knock Road, and from lower ground to the northwest of the objection site. We agree with the Department that the objection site is an important visual break between areas of dense development. As such it merits designation as LLPA. The Plan cites features warranting the BT142 designation as including “a municipal park, playing fields and green space”. The Plan refers to the views north from designation BT148 as one of the important features of that LLPA. Housing on the site would clearly and significantly impact on the visual continuity of the LLPA and green space; considerably more so than the existing commercial buildings and trees on Knock Road. We find this unacceptable and therefore recommend accordingly.
Draft BMAP refers to the replacement of Grosvenor Grammar, Orangefield Primary and Orangefield High Schools within the Plan period. We note that the two former have been rebuilt and that the latter appears to have been partially refurbished. The majority of the open space to the north of the objection site has also been upgraded and re-laid. The sports pitches are fenced off and span the entire width of the open space identified in the Plan. No provision appears to have been made for the access off Knock Road that was referred to by the objector. The schools appear to have retained and upgraded the existing accesses off the adjacent residential streets, through which traffic has been travelling for some time. The objector’s assertion that the BELB intends to seek to reacquire the site in order to construct a new access does not appear to have been followed through. We note and agree with Roads Service’s concerns that the proposed new junction on the Knock Road would increase delays and further impede the flow of traffic on the ring road, notwithstanding the existence of a signalised junction with Glen Road at present. We acknowledge Roads Services comment that it is more appropriate to promote the use of public transport than to engage in road improvements. We do not consider that the offer of the new road to serve the schools is a factor that outweighs our conclusions on the objection. Nor would the provision of other KSRs, attached to a housing zoning, relating to landscaping or provision of a short section of Community Greenway within the site.

We recommend no change to the Plan as a result of the objection.

**BT156 - Strathearn. Also to identification of Open Space**
(Objection 884)

The objection was submitted on behalf of Strathearn Grammar School, whose school premises are located on land at Belmont Road, Belfast. The objection relates to the identification of the school playing fields and tennis courts as existing open space and to the proposed LLPA. It was submitted that Strathearn Grammar School's programme to redevelop the site on the existing campus may involve a change to the location of the playing fields and tennis courts. An outline planning application and accompanying design concept statement was under preparation for submission to the Department. It was argued that the designation of the LLPA would unduly restrict the proposed redevelopment of this site; it is vital that there is sufficient flexibility provided by planning policy such that a tailor-made proposal could be identified for the site. In addition, it was posited that sufficient protection could be afforded to the stands of deciduous trees through the use of planning conditions or other planning controls.

The argument put forward by the objector regarding a possible need to relocate the facilities would not justify excluding their identification as existing open space, which is merely for information purposes. The needs of the school to redevelop the site would obviously be material considerations in any proposals involving changes to its recreational facilities. With specific regard to the tennis courts, we note that these are not identified as existing open space in all school grounds and we would raise a concern with regard to the consistency of the Department’s approach.

We agree with the Department’s analysis of the significant contribution made to the locality by the area identified as proposed LLPA. The designation would not preclude redevelopment of the site and would ensure that an appropriate level of protection
exists for the important features in the school grounds. We consider that designation BT156 is justified. We recommend no change to the Plan as a result of this objection.

**BT159 – Willis Lake**  
(Objection 2168/1&2)

The proposed Willis Lake LLPA is located within a residential area. Much of the LLPA is bounded by private gardens; however, public views exist from parts of Lakeside Drive, Aberfoyle Park, and Trossachs Drive. The objection site is a triangular-shaped area of hard-cored open space located at the southern edge of the Lake. It is bounded on all sides by public footpaths and separated from lakeside shrubs and trees by a wooden fence. The objection sought deletion of the site from the Willis Lake LLPA. We note that the Plan does not identify the site as existing open space and this element of the objection is therefore unnecessary. We reiterate our earlier statement that open space benefits from the protection afforded by regional policy whether or not it is identified in the Plan.

The objection site would appear to have been a design feature incorporated into the original housing layout. We note that it previously contained soft landscaping but had become unkempt. It is likely that this condition resulted from a management problem. We agree with the Department that the site has the potential to be upgraded and could be an asset. In our opinion, the importance of the objection site as it currently exists, lies not in its contribution to the landscape of the LLPA, but in the views of the lake and its surroundings that it facilitates from the main estate road. These views are extensive and important and would largely be obscured if a dwelling was erected on the site. We therefore consider that the site is an important element of open space in the LLPA and should be retained as part of that designation, even in its present condition.

The previous planning application on the site was not approved and has no bearing on our consideration. Whilst we acknowledge that there may have been complaints from local residents, there is little physical evidence to indicate that serious anti social behaviour occurs at the site. Such matters are commonplace on open space. The area of land in question is well overlooked, physically separated from domestic properties, and we are not convinced that unacceptable use of the site would justify development in this case. We recommend no change to the Plan as a result of this objection.

**OBJECTIONS SEEKING ADDITIONAL LLPA DESIGNATIONS**

**Land at West Kirk/Shankill Memorial Park**  
(Objection 2965/115 & 116)

The objection sites comprise two parcels of land on the southern side of Shankill Road:-

(i) The Shankill Memorial Park to the west of West Kirk Presbyterian Church, and,
(ii) An area of open space on the eastern side of the same church.

Site (i) is a neatly laid out area of public open space containing a war memorial and neatly manicured planted beds. Site (ii) contains a grassed area surrounded by brick
paving with surrounding tree and shrub planting. The site identified by the Department includes an area of car parking at the southern edge of the open space and the church.

The Department stated its opinion that both areas merit designation as LLPA on the basis of their environmental quality and value to the local community. We concur with this analysis. Given that the areas are adjacent to each other, we consider that a single LLPA designation is appropriate.

**Recommendation**

We recommend that the sites are designated as a single LLPA in the Plan, with the boundary based on the Department's map.

**Land at Nubia Street**  
(Objection 2965/117)

The objection site is a fenced, hard-surfaced, children's play area located at the junction of Moltke and Nubia Streets. Belfast City Council sought its identification as a LLPA.

Whilst the objection site provides valuable open space within the urban area, it has no landscape value and does not meet the criteria for inclusion within a LLPA. We agree with the Department that an LLPA designation is not the appropriate mechanism for the protection of play/sport provision. We recommend no change to the Plan as a result of this objection.

**Land at Torr Heath**  
(Objection 2965/118)

The objection sought the designation of the site as a LLPA. The objection lands comprise a gap site between numbers 36 and 42 Torrens Crescent. The Department has stated that “the site was formally developed by the Torr Heath Action Group as a play ground enclosed with railings and with a seating area. However the site no longer contains any play equipment or seating and would now be best described as a derelict space”. We would concur with this description. We agree with the Department that the site is now of no amenity value and displays no landscape quality; it does not meet the criteria for designation as a Local Landscape Policy Area. We recommend no change to the Plan as a result of the objection.

**Land at Wandsworth Road**  
(Objection 2965/119)

The objection from BCC sought the identification of an LLPA on a small area of open space at the junction of Knocklofty Park and Wandsworth Road. The objection site contains a group of mature trees including Pine, Sycamore, Cherry and Larch within an area of amenity grassland. A bitmac path cuts diagonally across the site. The Department considers that the objection site and its associated trees are of significant
landscape and visual importance and high amenity value and make a significant contribution to the treed character of the area.

The objection site lies within the proposed Belmont ATC. We note the Department’s concession that the open space and associated trees at Wandsworth meet the criteria for designation as an LLPA and have no reason to disagree with its opinion that the Plan should be amended accordingly.

**Recommendation**

We recommend that the site is designated as a LLPA in the Plan.

**OBJECTIONS TO URBAN LANDSCAPE WEDGE DESIGNATIONS**

**BT100 - Dundonald**
(Objections 3064)

This objection raised strategic issues in respect of housing land availability/allocation in Belfast, policy relating to ULWs, and the Plan’s approach to the protection of open space. These matters are dealt with in Part 1 of this report. In site-specific terms, the objection submitted that the extent of the proposed wedge should be reduced, and housing permitted on 28 acres of it. There was no objection to the proposed LLPA on the site. We note that a planning application was submitted in August 2006 for residential development on the lands, involving retention of a nine-hole golf course. It was argued that the golf club will require to move to a new location since part of the existing course is controlled by the Ulster Hospital and is the subject of a planning application for an extension of the hospital; if this land is reclaimed by the hospital, Summerfield will not be viable as an 18-hole course. The objector stated that the proposal provides a unique opportunity for ‘enabling development’, to facilitate a new golf course at Greengraves Road, whilst retaining 100 hectares of recreational land with a 9-hole course, which would be available for general public use.

Our conclusions on ULWs are contained in Part 1 of our report. Views of the golf course exist from several roads and areas of public resort in the vicinity. The ULW at this location provides a clear and important break on the northern side of the Upper Newtownards Road between the built-up areas and communities in East Belfast and Dundonald. We accept the Department’s comment that BT100 is a robust wedge at this location. Whether or not public access to the land exists is of no relevance to its role. We note the objector’s acknowledgement that the proposal would change the character of the western sector of the golf course. We do not accept that this part of the course contributes nothing to the role of the ULW. Irrespective of the submission that the new development would be sympathetic to landform and mature vegetation, we disagree with the claim that such a significant encroachment into the ULW could be undertaken without prejudicing its integrity. We accept that the cemetery portion of the wedge is ‘narrower’ than the golf course but that is not justification for reducing the extent of the wedge on the northern side of Upper Newtownards Road.
Once developed, the open space would be irreplaceable. We are not convinced that the existing golf club cannot continue to operate in its current location; the land in hospital ownership is existing open space and there would be a presumption against its loss to development. If the Department were minded to allow its development, the hospital land is on the eastern side of the golf course and this would reduce the wedge still further if the objection was successful.

We do not consider that the factors raised in support of the proposal outweigh the importance of retaining the open character of the ULW. The need for new private and social housing in Belfast, which we have acknowledged, should not be addressed by developing this land, even if it is in a sustainable location. We see no need for consolidation of the edge of the built-up area. The support of three Councils is not a factor that overrides our conclusions. Neither is the fact that many letters of support, and no letters of objection, were submitted in respect of the planning application. The planning gain in the road improvements posited by the objector does not outweigh the need to protect the wedge. We do not consider that the sporting, tourism, community and economic benefits that might emanate from the objector’s proposal would be so significant as to render it acceptable. We recommend no change to the Plan as a result of the objection.

**BT101 - Colin Glen**

Note: Please refer to the Lisburn section of our report reference ULW ML23.

**OBJECTIONS SEEKING ADDITIONAL URBAN LANDSCAPE WEDGE/RURAL LANDSCAPE WEDGE DESIGNATIONS**

**Objection seeking an Urban Landscape Wedge at Shandon Park Golf Course**

(Objection 2965/145)

The Plan proposes 4 ULWs, stating that these are designated to separate North Belfast from Glengormley, West Belfast from Dunmurry, East Belfast from Dundonald, and The Whiterock/St.James area from the Lower Andersonstown area in West Belfast. These wedges were also included in the BUAP.

Belfast City Council’s objection refers to the value of Shandon Park Golf Course as an important visual and physical connection between the countryside and the urban area; it was submitted that open space at Shandon/Gilnahirk exists as an important buffer between housing in the Braniel Estate to the south west and Gilnahirk/Cherryvalley to the north. The Council also referred to the existence of Community Greenway BT162/06 Odyssey/Tullycarnet/Ormeau Park, which runs through the golf course. It was argued that the objection site connects city wards with other green spaces (e.g. Orangefield Park) and these open spaces are important in separating Castlereagh from Knock. The Council’s view was that the golf course should be designated as Urban Landscape Wedge so the recreational and amenity value of area is protected. The Department's view was that it is unnecessary to designate an Urban Landscape Wedge...
in this locality as there is no need to separate different communities or define the identities and components of the areas in east Belfast.

We note from the BUAP that the open space to the northwest of the golf course was previously identified as a landscape wedge; however, this has not been carried through into BMAP. The golf course was not included in the aforementioned wedge. BMAP proposes to designate the golf course as LLPA BT148.

The strategic volume of the Plan states that the purpose of ULWs is to separate localities within the MUA in order to assist in defining and retaining the identities and characters of the component parts of the urban area and to prevent the merging of different city communities. However, it also refers to the open character of ULWs breaking up the impact of housing mass and offering benefits in terms of enhancing amenity, providing opportunities for recreation, and linkages for walking and cycling networks. We concur with the Council’s interpretation of the role of the golf course, relating to amenity and linkages as well as breaking up large areas of housing. It would also have a role in separating the communities of Castlereagh and East Belfast. We consider that the protection afforded to open space, and the proposed LLPA and Community Greenway by both regional and BMAP policies would be adequate in ensuring continuity of the land’s present functions. We therefore disagree with the Council’s argument that designation as a ULW is necessary. We recommend no change to the Plan as a result of this objection.

**Suggested Landscape Wedge at Ligoniel between zonings NB 03/17 and NB 02/29**

(Objection 2145)

It was argued that the river valley through Ligoniel and the open space between housing development sites NB 03/17 and NB 02/29 should be designated as a Landscape Wedge in order to properly protect it and link through to the countryside.

Designation of the objection lands as a landscape wedge would not physically enhance connectivity with the rural area. We note that the area in question is identified as open space, is proposed to be designated as a LLPA and SLNCI and contains part of Community Greenway BT162/02. We consider the existing level of protection afforded by both regional and Plan policies to be significant. In the context of the arguments put forward by the objector, we are not persuaded that designation as a landscape wedge is appropriate in this case. We recommend no change to the Plan as a result of the objection.
OPEN SPACE, SPORT AND OUTDOOR RECREATION

OBJECTIONS TO AREAS IDENTIFIED AS OPEN SPACE

Belfast City Council

Belfast City Council’s objection (2965) referred to various areas of open space that were either not identified on the Plan maps or were identified incorrectly. These elements of the objection were not specifically referred to in the Department’s spreadsheet. We have already commented on the methodology for identification of existing open space in part 1 of our report. We consider that the Department should examine the Council’s comments and amend the Plan maps where necessary.

Windsor Park Football Ground
(Objection 1156/1)

The Site comprises Windsor Park Stadium and Midgley Park football pitch, which are identified as existing open space on Plan map 4/003. The only site-specific aspect of the objection was to the latter.

The concern was that the adopted Plan may unnecessarily constrain or preclude the development of the objection site. It was argued that Linfield Football Club’s future at the objection site is under review. The stadium at Windsor Park is also a factor in the debate surrounding a new national stadium. In the event that the Club was to relocate, the lands would represent an important site within the existing urban area which could be utilised for a wide variety of uses reflecting those around it, including housing, retailing and employment.

We consider that both private and public sports stadia would fall within the definition of open space and we have already indicated our views on the identification of same in the Plan. We do not have a specific proposal before us to zone the objection site; merely an argument that it should not be identified as open space in case Linfield Football and Athletic Club decides to vacate the land. It is our understanding that the debate over the new national stadium is ongoing and that both Windsor and Midgley Parks remain in sports use.

Should the stadium and grounds become redundant in the future, this would clearly be a factor that would be material in the consideration of any planning application for alternative uses. Given the present situation however, and in the interests of consistency, we consider that the objection site should continue to be identified as open space in the Plan.
Objection to identification as Open Space and seeking DOS (mainly residential) – Oval Football Ground
(Objection 3798/1 & 2)

The site comprises the Oval football stadium, which is situated in a predominantly residential part of east Belfast. The stadium is currently used by Glentoran Football Club. At the inquiry the objector indicated that residential use on half of the site would be precluded by the new airport Public Safety Zone. Given this, the objection now sought the identification of the land as a ‘chauffered’ public car park to serve the City Airport. It was argued that the stadium is no longer fit for purpose or fully used, and that Glentoran F.C.’s former support base has waned. The Club seeks flexibility to relocate in the period up to 2018. In addition, access to the ground is unsuitable as it runs through residential streets.

We have already commented on the identification of DOSs. Given that the site is still in regular use as a football stadium, it could not be described as vacant or underutilised land. We fail to see how its redevelopment would contribute to urban regeneration, particularly if it were for car parking. We do not accept that a DOS designation is appropriate at this location.

We note that the Club has no definite plans to relocate and agree with the Department that it is premature at this stage to assume such. The Department stated that, if firm proposals for relocation/redevelopment had come forward, the Plan would have accommodated these; a caveat would apply to car parking proposals, however, in view of the residential uses, access difficulties and current car parking problems in the area. Given that this statement was made in the policy context of PPS8, we consider that the remark demonstrates a flexible attitude by the Department; presumably such flexibility would be applied in respect of any future proposal, including housing on the area unaffected by the Public Safety Zone.

We note that access to an airport car park would be through the same residential streets, would result in vehicle movements on a more regular/daily basis, and would be likely to increase, rather than reduce, traffic problems and nuisance to residents. This would be the case whether or not a chauffeur service was provided. We share the concerns of Roads Service regarding the difficulties in providing an access directly to the Sydenham bypass, particularly since it is separated from the site by a railway line. The proposed Connsbank Link is a Plan proposal, but its provision remains some years away at best. We do not consider that the Plan should identify any of the site for airport car parking.

Sports grounds, whether public or private, are a valuable community resource and should be protected by the planning system unless they are demonstrably unnecessary. This is not the case here. Given the current use of the site, and in the interests of consistency, we consider that the Oval site should continue to be identified as open space in the Plan.
Objection to identification as Open Space - Gibson Park
(Objection 3127)

This objection was to the identification of the site as existing open space, the Plan's inadequate overall housing allocation and to the lack of provision in the Belfast area. The objector provided no reasoning in respect of the issues raised.

Our comments on the housing allocation for Belfast are contained in part 1 of the report, as are our conclusions on the identification of open space. We disagree with the Department’s view that sufficient lands have been identified in Belfast to meet housing need.

The site in question is currently in use as sports grounds and there is an associated clubhouse. The lands clearly fall within the definition of open space contained in regional policy. Whilst there is a recognised need for additional housing in Belfast, we do not consider that this should be provided at the expense of recreational facilities, unless they are demonstrably unnecessary. Sports grounds should not be zoned for an alternative use without clear justification. No such justification has been presented for our consideration. We therefore reject the objector’s submission and recommend no change to the Plan.

Land at Shore Road - Objection to identification as Open Space
(Objections 3756 and 3759)

Objection 3756 sought the removal of the open space identification on the lands between the Shore Road and the railway line. It was argued that the lands should be identified as a DOS – mainly retail and housing. The objector indicated that the objection lands were the subject of a planning application (reference Z/2003/2548/O) for a mixed retail, residential, and recreational development.

Given our conclusions in part 1 of the report, we cannot accept that public open space should be identified as a DOS. We reject any suggestion that open space could be described as vacant or underutilised land in terms of the role of DOSs as an urban regeneration tool.

3756
Objection site 3756 is currently in use by Belfast City Council as playing fields, with an associated recreation centre and car park. The objector argued that the buildings are poorly maintained and in need of substantial renovation. It was submitted that, in order to rejuvenate the area, and provide new recreational facilities, housing and retail provision, the Council has embarked on a public/private development project.

We do not agree that the site is in poor condition. The sports pitches appear to be well maintained and are open to public use. We accept that the leisure centre may be in need of some renovation, but this in itself is no reason to zone open space for development. The lack of natural screening around the site is not a factor that weighs in favour of the proposal.
As the body responsible for the provision and maintenance of public sports and recreational facilities in the city, we assume that BCC took into account the needs of the community when drawing up the proposals for the area that were referred to. We understand that the proposals involve relocation of the leisure facilities further to the north, with new housing and a retail facility close to the motorway access. However, we were not provided with any details of the scheme, including the extent of the various land use elements thereof, and are unaware of the progress of the application. In the circumstances we are unable to make specific recommendations on the rezoning of the site.

We consider that the Department should ascertain the status of the site and that the Plan should take into account any approval that has been granted. In the event that no consent exists, the Plan should continue to identify the playing fields as open space for information purposes, in line with our recommendations in Part 1 of the report.

**Recommendation**

Should planning approval for redevelopment have been granted, we recommend that the Plan is amended to reflect same.

3759
See section on Belfast Harbour, BHA16.

**OBJECTIONS SEEKING THE ZONING OF OPEN SPACE FOR HOUSING**

There were many objections that referred to large housing estates or areas in Belfast and stated that too much land had been zoned as open space in these areas. The objections sought housing zonings on the open space. We cannot address these objections because we were not presented with any indication of the location of individual sites or amount of land to be zoned. In addition we have no information as to the amount of open space in the area or the contribution that the sites make to the amenity of the area. We are conscious that once open space has been lost it can never be recovered. We have recommended that the Department identifies open space carefully in Part 1 of this report. It appears that there are instances of the sites of former dwellings being indicated as open space. The correction of such errors may address some of the objectors’ concerns.

**OBJECTIONS SEEKING IDENTIFICATION/ZONING AS OPEN SPACE**

**Land at Wolf Hill Mill - Objection to lack of zoning as open space**
(Objection 2855/5)

The objection pointed out that the site was zoned in the BUAP 2001 as Landscape, Amenity or Recreational use. The site is not zoned in BMAP. It was formerly the site of Wolfhill Mill. It was argued that the land should not be left unzoned within the development limited but identified and protected as open space.
It is our understanding that planning permission has been granted for residential development on the site. Given this, it would be inappropriate to zone the site as open space and we therefore recommend no change to the Plan as a result of the objection.

**OBJECTIONS TO COMMUNITY GREENWAYS**

**Objection to Designation BT162/02**  
(Objections 2850/4 and 3824/5)

These objections are dealt with under existing employment zonings BT 011/12 and BT 010, respectively.

**Objection to Designation BT162/08 in relation to the proposed route through BHA**  
(Objection 2015/43)

This section of the Community Greenway is shown running on-street through the docks from Corporation Street to Duncrue. The objectors considered that this proposal would lead to severe problems of conflict between pedestrians/cyclists and heavy goods vehicles, as well as security issues. The Department clarified that the dots shown on Map No. 4/0002 were indicative only and were content to omit them from the map and seek an alternative route avoiding the industrial/port area. We have no reason to depart from this agreement.

**Recommendation**

That the route of Designation BT162/08 Community Greenway traversing BHA as shown on Map No. 4/0002 be removed from the Plan and an alternative route be identified.

**Designation BT162/07 Community Greenway – Odyssey/Stormont**

See section on Belfast Harbour.

**OBJECTIONS SEEKING COMMUNITY GREENWAYS**

A Community Greenway has been considered along the route of the EWAY in connection with objections to the EWAY proposal in the Transportation section.
EDUCATION, HEALTH, COMMUNITY, AND CULTURAL FACILITIES

Proposal BT 164
(Objection 1866)

Objection 1866 refers to the Plan’s failure to address the issue of future education and training. The sites proposed were not included with the objection and we cannot therefore consider this objection further. We wonder how this objection was linked to Proposal BT 164, as Belfast is not referred to in the objection.

BT 164/03 Springvale, Springfield Road
(Objection 2965)

Belfast City Council commented that the Springvale Campus proposal has been abandoned by UUJ and therefore that it may be appropriate to designate the site for mixed use. We note that the construction of Springvale Economic Development Campus for Belfast Metropolitan College is nearing completion and so it appears that this element of objection 2965 is without basis. We recommend no change to the Plan as a result of this objection.

Objection to failure to identify additional land for education purposes at An Droichead, Cooke St/Ormeau Road
(Objection 543/1)

This objection was “to the failure to zone for educational purposes the land beside An Droichead, bounded by Cooke Street, Ormeau Road and the Gasworks site”. It was argued that, as the only Irish medium school in South and East Belfast with an ever increasing number of pupils, it is essential that this land is made available for the continued development of this school and its related activities.

We have stated our view on the Plan’s policy and strategy in respect of educational facilities in part 1 of our report. We note that the Council for Irish Medium Education (along with other education authorities) was consulted in respect of the identification of land needed for education purposes. The Plan identifies land needed for education and Policy CF1 would preclude proposals for any other land use on the zonings.

The land in question is currently used as a car park, apparently by UTV staff. It is not affected by any zoning in the Plan. We have no indication that it is available for the school’s use, nor of its planning history. In the circumstances, and in view of the fact that it could significantly fetter the owner’s future intentions for the site, we are not convinced that it would be appropriate to identify it for educational use. Notwithstanding this, and given the Plan’s general support for the provision of land necessary for educational facilities, we see no impediment in principle to such a use, should a proposal for same be forthcoming. We do not consider that the Plan should be changed as a result of this objection.
**Lenadoon Community Forum Objection**  
(Objection 1154)

The objectors did not suggest any use for the site of the former Suffolk Inn. We cannot therefore make any recommendation on this matter. The objection did not identify any site for community facilities that we could consider for designation. The Plan has dealt with Belfast City Council requirements for new community facilities. We cannot consider the objection any further.

**WBP Objection Regarding Community Facilities**  
(2258/106)

The objection stated that no land has been identified for community facilities. This referred to the Glen Community Complex. This property was not identified or included in the original objection and so cannot be considered. In any event the building is referred to as in use for community facilities at present and so designation would make little practical difference. The submission relates to the need for repair and refurbishment of the building, which is outwith the scope of the Plan.
RURAL BELFAST

HANNAHSTOWN

General Objection to the Settlement Limit
(Objection 1620)

In relation to the general points made at the Inquiry, there is ample land included within the settlement limit, commensurate with its position in the settlement hierarchy – a small settlement. We agree with the counter-objector that a compact settlement form is important in order to safeguard the Belfast Hills and the landscape quality of the area. We consider that social and affordable housing needs can be met in Belfast nearby. There is no justification for including the GAA Grounds in the settlement limit. The objector sought to argue for the merits of particular sites at the inquiry. However, as these sites were not identified in the original objection, these matters cannot be considered further. We recommend no change to the Plan as a result of this objection.

Lands south of Hannahstown
(Objections 150 & 3089)

This site is described as Hannahstown, but lies adjacent to the west Belfast development limit and within the RLW. The objections were to the site’s inclusion in the RLW and AOHSV and its exclusion from a settlement limit. No supporting case was supplied. The need for housing land has been addressed in Part 1 of our report. The environmental impact of development must be assessed and it is not appropriate to zone all objection sites because of a perceived housing problem. The site is an important and large portion of the RLW. We consider that the site should remain as part of the RLW, given its strategic functions as set out on page 33 of the Plan. It is also an important element in the proposed AOHSV, which is justified at this location in order to protect the setting of the city. The development of the site would erode approximately a quarter of the RLW and would be prominent in views from the south. It would not constitute infill or rounding-off; it would relate poorly to the existing limit and provide an illogical new limit for Belfast. It would not adjoin the existing limit for Hannahstown. The scale of the site would rule it out as an expansion of Hannahstown, in any event. We therefore recommend no change to the Plan as a result of these objections.

Lands south of Brendarragh Terrace
(Objection 3137)

This site is quite extensive comprising 2 fields sloping down to the south of the main small settlement boundary. Part of the site is within the Hannahstown RLW. The objection was not supported with any evidence or justification for such a large-scale expansion to the small settlement. We agree with the Department and the counter-objector that the site does not comprise a rounding-off or consolidation of the settlement and is therefore unacceptable. The inclusion of additional lands on this scale would be contrary to the settlement and housing strategy in relation to small settlements. We therefore recommend no change to the Plan as a result of this objection.
**Lands SW and SE of Hannahstown Hill**  
(Objections 2746 & 2750)

The objections relate to two large fields south of the previous objection site and a large area south of St. Joseph’s Church. The site is within the Hannahstown RLW (CA 03) and partly within a proposed LLPA (HN 02). The objections to these designations were basically predicated on the sites being developed for residential purposes. We shall consider the principle of the sites’ inclusion in the settlement limit and the effect on the RLW first. The sites (individually or collectively) would represent a large-scale expansion to the small settlement. We agree with the Department and the counter-objector that the sites would be prominent in views from the south, notwithstanding that the village is at a higher level. This is a historic small settlement and its mere presence cannot justify development proposals such as these. The planning application referred to is undetermined and cannot therefore influence the consideration of the objection. We consider that the sites are an important part of the RLW and serve to separate the small settlement from the edge of the city, which is the primary function of the RLW. These lands retain an open character and do not need to have a special amenity function. The sites do not comprise rounding-off or consolidation of the settlement and are therefore unacceptable. The inclusion of additional lands on this scale would be contrary to the settlement and housing strategy in relation to small settlements.

As the principle of development is not acceptable, we do not need to consider the detailed arguments related to the proposed LLPA. There were no substantive arguments regarding the principle of the LLPA HN 02. We note that LLPA HN03 is some distance away from the sites. The objections to the AOHSV were not part of the original objection and cannot be considered. In conclusion, we consider that the objections to the settlement limit, RLW and LLPA have not been sustained. We therefore recommend no change to the Plan as a result of these objections.

**Lands west of Hannahstown Hill**  
(Objections 907 and 3401)

This is an objection to the Belfast settlement limit seeking an extension northwards. The objection also relates to LLPA HN02 and the AOHSV, insofar as they affect the site. The Department’s approach was to utilise the criteria in Policy COU2 of the draft Plan in order to assess the objection site. This was not a valid approach: the objection and Plan designations must be assessed on their own merits. We have taken into account the objectors’ points in relation to retaining vegetation along the stream (NW boundary of the site) and enhancing it with a 5-8m wide landscape buffer. We also note the concept plan, which shows a triangular area in the northern part of the site remaining undeveloped.

We consider that the St. Joseph’s node is visually and physically separate from the site by virtue of the difference in level and the road in between. We do not therefore agree that the inclusion of the site would place this node in its proper context. The Department’s reasoning in designating a separate node around the Church is unclear and perhaps did not assist the consideration of objections in the RLW. We agree with the objector that there is somewhat of a ragged edge to the existing development limit with some fencing to the rear of the properties in Hawthorn View visible. However,
there are trees and hedges along this boundary also. The site is below the level of the road but is visible from longer views to the south and west. The adjoining residential development is amongst some of the highest in Belfast. We note the argument that the proposal would provide a better definition of the settlement limit. We consider that this potential benefit is outweighed by several negative effects. The site would be elevated and would extend the built development at a high elevation. The development would erode the RLW, which we consider to be an important consideration, as discussed above. The proposal would bring the development closer to the stream corridor and could have some effects on the landscape and nature conservation interest of the site. Part of the site is subject to flooding from the adjacent watercourse. We do not agree with the Department that views of and from the Church would be detrimentally affected. The site is elevated and an important part of the setting of the city. we therefore consider that the site should remain within the AOHSV also. Having assessed all the arguments made by the parties, we consider that the detrimental effects of the proposal on the RLW, the AOHSV and the separation between Hannahstown and west Belfast mean that the objections should not succeed. We recommend no change to the Plan as a result of these objections.

BELFAST COUNTRYSIDE

Objection to AOHSV and AOCMD Designations at Old Coach Road, Ligoniel
(Objection 2855/18)

Concern was raised that these designations may prejudice the proposal to reopen this road to alleviate traffic impact on Ligoniel Village. We were presented with no details of the road scheme and note that there is no transport proposal in the Plan for same. We have commented on the proposed AOCMDs in part 1 of our report. We fail to see how either designation could prejudice a proposal to reopen a road. We recommend no change to the Plan as a result of the objection.

Designation CA 03 RLW
(Objection 2145/5 - Forest of Belfast)

The above objection has been classified as an objection to designation CA03 – Hannahstown RLW. We have considered the original objection letter and it states nothing but support for designation CA03. It refers to concerns regarding ULW designations further to the south along the Colin River. The other bank of the river from CA03 is outside the development limit and not under particular pressure from development.

Waste Facility, Glenside, Hannahstown
(Objection 3376)

This objection site lies in the countryside and within an AOHSV in the Plan. The objection sought that the site be identified as an existing waste processing facility and excluded from the AOHSV. We consider that the AOHSV is justified in this general
area because of its contribution to the setting of the city. There was no basis put forward for the exclusion of the site from the midst of the AOHSV. The Plan, quite properly, does not identify every existing employment use within the countryside. Development at waste processing facilities is covered by regional policy. We recommend no change to the Plan as a result of the objection.

**Blackmountain Quarry**  
(Objection 2029)

The objector confirmed in their statement of case that they had no site specific objections to raise with the Commission. The objection solely related to strategic matters considered in the first part of our report.

**Cairn Quarry, Hannahstown**  
(Objection 1767)

This was an objection to the site’s inclusion in an Area of Constraint on Minerals Development and partly to some of the site being included in an AOHSV. We have addressed the issue of AOCMD in Part 1 of this report. There was no suggestion by the agent that the site should be included in the development limit. The issue of whether the quarry has a live planning permission is not for this process. The designations on the site cannot remove development rights conferred by a planning consent and future proposals will be assessed against regional policy. The Plan cannot identify every business in the countryside that has employees. For example, in this case there appears to be confusion over whether there even is a valid planning permission on the site. It is not the function of the Plan to identify and provide for rural businesses. The purpose of the employment audit is to evaluate whether enough land has been allocated for employment uses within the development limit. We see no basis for supporting the objection and recommend no change to the Plan as a result of the objection.
APPENDIX 1

Plan 1  Site at Ligoniel.
Plan 2  SLNCI BT 102/31.
Plan 3  SLNCI BT 102/17.
Plan 4  SLNCI BT 102/22.
Site Location Map

Legend

- Site Boundary
- Viewpoint Location

PLAN 1
SITE AT LIGONIEL

Lands at Ligoniel

Site Specific Statement of Evidence – 2529 4 2850
Lands West of Ligoniel
Whitemountain
Additional West Belfast Partnership Objections

Objection to non-identification of Gateways outside Belfast City Centre
(Objection 2258/94)

Gateways to the City Centre are listed as main elements of the conceptual spatial framework in the Belfast City Centre Strategy. 11 locations are identified on p. 21 and Diagram 1 of the Belfast Volume (including the three City Centre locations referred to in the objection). The Planning Actions on p. 23 refer to the gateway locations being included in the City Centre Character Areas. The Plan defines these Gateways on Map 2/001. The Character Area Designations merely impose building height restrictions and do not address the issues of these Gateways being inappropriately developed or undeveloped or presenting a poor entrance to the City Centre that were raised in Volume 1 of the Plan. We consider that the Plan could do more to facilitate appropriate development at these locations. This matter could be addressed as part of the reconsideration of DOS that we recommended in Part 1 of our report. The objection seeks environmental improvements at three Gateway locations to the west of the City Centre. This is a development plan concerned with the proper land use planning for the area. Regeneration initiatives are the responsibility of another Department and other bodies and are therefore outwith the scope of this Plan. This is also the situation with the identified problems with Castle Street extending into the Falls Road, which was identified as a potential mini-Laganside.

The Plan only designates Gateways within the City Centre. Some limits must be imposed on the Plan Designations or every approach to the city could be a gateway and arguments regarding their location would be rife. We consider that restricting them to the City Centre is a valid approach. We shall comment briefly on the objectors’ suggested locations below.

The Westlink has been upgraded and the Broadway junction has been improved by means of an underpass. Pedestrian links have been improved. A major public art installation has recently been provided at Broadway. It therefore appears that the objectors’ requirements have been realised. Our comments above on environmental improvements would equally apply to the suggested location at Kennedy Way. We do not consider that this is a gateway either; it is a radial link as stated in the objectors’ submissions. Belfast International Airport is a Regional Gateway for the whole region and not just West Belfast. We have addressed the issue of signage in Part 1 of our report. The transport linkage improvements are not identified in the statement of case and in any event, this issue was not in the original objection. The roads identified as gateways in the objection are simply some routes to the airport from West Belfast and not gateways to the city. We have addressed environmental improvements above. The Colin Urban Zone was not in the original objection and so these submissions cannot be considered further.
Objection to non-identification of sites as DOS
(Objection 2258/95)

We have set out our approach to the designation of DOS outside the defined City Centre in Part 1 of our report. We concluded that they should only be designated at strategic locations where they will promote the vitality and viability of the urban area or enhance townscape or meet other important objectives of the Plan. We shall now address the sites referred to in the objectors’ submissions.

St. Comgall’s School

The objectors state that the site has been acquired by the Falls Community Council. The building appears to be vacant and artwork has been provided to the boards covering the windows. It presents a poor appearance of dereliction and vandalism at the moment. The intention is to develop a “must see” visitor attraction in the building and bring it back into use. The proposal is for the building to accommodate a tourism related development. We considered the issue of DOS where tourism projects are involved in Part 1 of our report and concluded that they should not be designated in the absence of definite proposals. There are no definite proposals in this case and a designation for such use could have the effect of preventing development on this important site. There is nothing to prevent the proposal coming forward for consideration as part of the development management process. We recommend no change to the Plan.

Gaeltacht Quarter

The quarter is indicated on Map 2 attached to the original objection. This map indicates several sites in a schematic way. There is insufficient information to identify which sites are being proposed other than the ones we shall consider either as DOS or Gateways. We must therefore turn to the objectors’ evidence to ascertain their intentions in submitting the objection. The emphasis is on the creation and fostering of a new city quarter based on the Irish language. This would reap benefits in terms of regeneration and economic development, it was claimed. The area has been the subject of policies aimed at supporting regeneration and renewal, such as the designation of Arterial Routes and the accompanying commercial nodes etc. The Department has also indicated a more flexible approach to uses on employment sites and supported mixed use developments. The Plan contains little guidance or policy in terms of the issues identified in the objector’s submissions on other city quarters, the exception being Titanic Quarter. This is a completely different situation as Titanic Quarter was a blank canvas earmarked for significant new development. West Belfast is a long established area with differing characteristics. We are unsure as to what changes to the Plan the objectors are proposing, if any. We have indicated in paragraph 12.1.5 of Part 1 of our report that the Department may wish to refer to other city quarters in the explanatory text to the Plan’s Tourism Strategy. There are no sites for us to consider for designation as DOS under this heading and we recommend no change to the Plan. We considered the issue of DOS where tourism projects should be accommodated in Part 1 of our report and concluded that they should not be designated in the absence of definite proposals.
Conway Mill

This site was not included in the original objection and we cannot consider it further for that reason. We note that the mill building has been refurbished and is in use for a wide range of uses. It would not therefore be appropriate for such a designation anyway.

Former Police Station, Andersonstown Road

The site lies at the junction of the Andersonstown, Falls and Glen Roads and has been cleared and surfaced. The site is in a Commercial Node in the Plan, which we have recommended should be deleted as there is insufficient commercial activity at the moment. The objectors' proposals for the site included a hotel and apartment development as a funding source. We considered the issue of DOS where tourism projects should be accommodated in Part 1 of our report and concluded that they should not be designated in the absence of definite proposals. There are no definite proposals in this case and a designation for such use could have the effect of preventing development on this important site. Proposals for tourism projects and residential development can come forward on sites within the built-up area and designation as a DOS would make little difference to this outcome. We recommend no change to the Plan as a result of this objection.

**INSERTED AT PAGE 109 OF REPORT**

COMMUNITY FACILITIES

2258/106

There was a submission pursuant to the objection that no land has been identified for community facilities. This referred to the Glen Community Complex. This property was not identified or included in the original objection and so cannot be considered. In any event the building is referred to as in use for community facilities at present and so designation would make little practical difference. The submission relates to the need for repair and refurbishment of the building, which is outwith the scope of the Plan.

**INSERTED AT PAGE 179 OF REPORT**

THE WBP OBJECTION NUMBER ONLY HAS BEEN ADDED TO THE REPORT ON BT 15/02 PARK AND RIDE KENNEDY WAY ON P. 136.