

## **Public Consultation Draft Control of Development in Airport Public Safety Zones**

### **Draft Response**

Belfast City Council accepts the basic policy objective of the Public Safety Zones which are identified “*areas of land at the ends of the runways at the busiest airports in the UK, within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on take off or landing*”.

However the proposed policy guidance, as currently outlined, introduces elements of uncertainty and the Council would like to take this opportunity to seek clarification through consideration of issues including Victoria Park and the proposed transport infrastructure.

It is noted that there are similar implications for private property within the defined zone which extends to Mersey Street. The implications for these premises should also be clarified in relation to the potential effects of the restrictions relating to intensification through development or change of use.

### **Victoria Park**

The Council request clarification on existing situations and operations taking place within the Public Safety Zones. A substantial segment of Victoria Park is included within the George Best Airport Runway 04 Public Safety Zone (**See Map 1**). The area affected currently incorporates playing fields, the band stand, car park and public park with adjacent uses of a childrens playground and bowling green. There is no clear guidance or indication as to how intensification would or could be assessed.

The guidance suggests that public open space, in cases where there is a reasonable expectation of low intensity use may be appropriate, but “attractions such as children’s playgrounds will not be permitted in such locations. Nor will playing fields or sports grounds be permitted within public safety zones as these are likely to attract significant numbers of people on a regular basis”.

This does not appear to take account of the existing potential for intensive use through informal activities within these areas that could mean that higher intensities of use are being achieved.

Clarity in interpretation is important both in relation to facility development and as it could undermine the capacity of the park to absorb the potential changes (through facility relocation etc) arising from the potential loss of land for the proposed widening of the Sydenham Bypass.

The Council would also seek clarification on staging events in Victoria Park, would this be interpreted as drawing too many people into the area.

### **Transport Infrastructure**

The consultation document states that transport infrastructure is considered for Public Safety Zone (PSZ) purposes as if it were residential, commercial or industrial development. As with those more traditional forms of development, it is not considered necessary to remove existing transport infrastructure from within PSZ’s

but new infrastructure such as railway stations, bus stations and park and ride schemes will not be permitted within PSZ's as they would result in a concentration of people for long periods of the day.

The document states that proposals for major roads and motorways will be carefully assessed in terms of the average density of people that might be expected to be exposed to risk. The guidance goes on to state that careful attention should be given to the locations of major road junctions and to related features such as traffic lights and roundabouts which may lead to an increase in the number of stationary vehicles within a Zone.

The current BMAP Road Proposal BHA 11 Non Strategic Road Scheme New Junction on the A2 lies within the identified George Best Airport Runway 04 Public Safety Zone boundary.

The Council would request qualification or an assessment by way of examples in the guidance of the impact of the designation of the George Best Airport Runway 04 on the consideration and suitability of the Road Proposal BHA 11 Non Strategic Road Scheme New Junction on the A2.

### **Other Considerations**

The Council would also seek clarification on how the designation of PSZ's will impact on other existing operations or proposed developments within the identified safety zones. Many existing or proposed developments may have been under consideration for a considerable period of time and investment decisions may have been taken without awareness of the implications suggested in the guidance.

It is not clear as to how the guidance applies to the intensification of existing residential uses in the areas affected through extension or sub-division of property and how this would be regulated by statutory agencies in the context of permitted development rights.

The Council would also request clarification as to whether there would be an impact on the extent of the Public Safety Zones arising from any future increase in Air Transport Movements or the types of aircraft approved to use the facility.