

**Belfast City Council Consultation**  
**Draft Statement of Community Involvement**  
**MAG Response**  
**27 | 11 | 15**

# **THE MINISTERIAL ADVISORY GROUP (MAG) FOR ARCHITECTURE AND THE BUILT ENVIRONMENT**

## **RESPONSE TO BELFAST CITY COUNCIL CONSULATION – DRAFT STATEMENT OF COMMUNITY INVOLVEMENT**

### **1.0 Introduction**

MAG, the Ministerial Advisory Group for Architecture and the Built Environment, welcomes the opportunity to comment on the draft Statement of Community Involvement.

The structure and general context of the draft Statement of Community Involvement are based on the Planning Act 2011 and The Planning (Statement of Community Involvement) Regulation (Northern Ireland) 2015.

Compliance with the legislation and the requirement to seek Departmental approval seems to require a style of language which can be difficult for the public to understand and sympathise with, and suggests a top down approach.

### **Background and Purpose.**

- 2.1** In the final sentence it describes who, how and when the community will be invited to participate in the different stages of both LDP formulation and determination of planning applications

MAG suggests a more user-friendly community involvement as follows: 'We will actively encourage and involve the community in creative participation in the different stages of both LDP formulation and the determination of planning applications.'

### **A Vision of Participation**

- 2.5** The words "meaningful, inclusive and fit for purpose" are general terms.

MAG suggests these could be replaced with:

'We are committed to placing the community at the heart of everything we do and we will engage with the public to understand their needs and expectations'.

- 2.6** MAG also suggests that this paragraph could be expanded to encourage pre-planning development of public consciousness to participate and express views and ideas before the LDP process is begun.

## **Purpose**

### **3.1** MAG suggests the last sentence reworded as follows:

‘We will actively encourage creative involvement of the community in local spatial and implementation plans including and integrating the stewardship of places, as well as policies.’

## **Who can get involved?**

### **3.2** MAG suggests a minor rewording of:

“to do so as the opportunities arise” to:

‘will be encouraged through continuous involvement’

## **How and when the community will be involved**

### **3.8** MAG comments:

This is not just about seeking views on pre-determined opportunities but seeking real evidence on people developing their own ideas to bring to the council and seek council views.

MAG suggests the following action at the beginning of the community involvement process:

“Embed the concept of stewardship as now described in supplementary planning guidance Living Places and in the Strategic Planning Policy Statement. Stewardship is already operational in many places, but communities and built environment professionals may need to specifically identify and encourage it. Stewardship can thereby be further developed early, easily and cheaply, be continuous and provide evidence to inform plan making and implementation.

Stewardship is a great way to involve people and allow them to see real results very quickly, encouraging further participation.’

## **Actions**

### **3.9** The involvement of the steering group comprising the council’s Planning Committee with the Chief Executive, Director of Planning and Place and the project management team comprising senior council officers, the Principal Planning officer and representatives from the key government departments are important to ensure the integration of statutory consultees and their departments who are required to co-operate in the plan making process. It is particularly important that the council

encourage statutory consultees to look beyond their departmental remit and engage in innovative solutions as part of the Local Policies Plan.

### **Local Policies Plan**

**3.15** MAG welcomes the Local Policies Plan as a key part of the public participation process and suggests an emphasis on collaboration and working to an agreed Plan Strategy, the inclusion of stewardship methods and the use of words other than 'land use zonings' to reduce jargon and increase public understanding. A clearer understanding of what local Policies would include could read, for example:

'Once a Plan Strategy is adopted, we will work together to prepare a Local Policies Plan. This will include place-specific proposals, policy designations, proposed stewardship methods, and proposals for uses of land (emphasising the importance of changing uses over short and long periods of time and mixed uses) that will be required to implement our collective vision, objectives, spatial strategies and strategic policies defined by our agreed Plan Strategy'.

### **Next steps**

**3.19** MAG welcomes the consideration of a new SCI if considered appropriate

### **The Community Plan**

**3.22** MAG welcomes the requirement to produce a community plan every four years to provide the flexibility required to take account of change.

### **The Belfast Agenda**

**3.25** The Belfast Agenda is the city's community plan but is a strategic framework setting a long-term vision. Also the community plan will thus provide the strategic context for both a future regeneration policy and the spatial planning responsibility as part of the LDP.

MAG has concerns about the relationship between a long-term strategy and the requirement to produce a community plan every four years.

The Belfast Agenda is an attractive title but requires further explanation.

## **The Belfast Conversation**

- 3.26** The Belfast Conversation is a valuable confirmation of continuing dialogue which informs the Belfast Agenda and ensures that the community plan is a continuing process and not just a plan.

MAG suggests that the Belfast Conversation should be part of the beginning of the SCI to encourage local communities to develop their Vision for the future such as the 'Six Week Ward Vision' exercises completed with other councils. These 'bottom up' Visions would yield benefits for continuing stages of the SCI and the process of dialogue would begin to involve communities at an early stage. Quickly produced Ward Visions can also help to manage central government and other initiatives such as 'Urban Villages' in an inclusive manner to benefit all in a Ward. Because Wards are defined and contiguous, making up the entire City Council area, work at the Ward level helps to form a valuable contribution to the city as a whole and to adjacent Wards whose Visions may precede or follow. This concept follows Locality Planning in Health, for example, which defines its work in terms of specified Wards. The benefits include:

- Minimal resources required
- Involve planning staff in developing community relations
- Mentor and advise local communities and harness the energy and creative inputs from local people to claim stewardship of their area and city.
- Give informed communities the skills respond to the council and developers as part of development management.

## **The Councils' Development Management Function Pre-Application Discussions (PADs)**

- 4.3** MAG suggests:

In the interests of transparency, neighbours who would be statutorily notified of a planning application should be informed when PADs take place with an applicant or potential applicant, and invited to attend. This should apply particularly to PADs with the special group within Belfast Planning Office dealing with developers. This will involve affected neighbours at the start of the process when they can contribute most before nugatory work has been undertaken and time wasted.

- 4.8** MAG supports the encouragement of local people to participate in early engagement events "as it will help the developer better understand local concerns or circumstances"

## **Community Involvement in Conservation Area Designation**

- 7.1** MAG would suggest that communities be made aware that the council will take a proactive approach to Conservation Area designation and seek community involvement in this process. It should be made clear that Conservation Area designation can occur independently of the preparation and adoption of a Local

Development Plan. The Statement of Community Involvement should specifically state that the Council welcomes suggestions from the public about potential Conservation Area designations, including proposals for changes to existing Conservation Areas. Community-led Conservation Area designations can create a high level of involvement early and can achieve a measurably better city and local environment during the years that the big statutory plans take to be adopted. A Conservation Area that stems from community initiative and has the support of residents and neighbours has a far greater chance of continuing success and sustainability than one which is imposed by “experts” in a planning authority. Positive examples exist in Belfast where communities’ suggestions for Conservation Areas were designated by the planning authority. There are also negative examples where the environment has been significantly downgraded because the planning authority did not listen to the views of residents and declined to designate Conservation Areas.

Community Involvement works. Let’s do it well and see results quickly, at low cost and high quality – often ‘lighter, quicker, cheaper’ and better than the big projects and plans.

<b>Arthur Acheson</b>	<b>Chair</b>	<b>Ministerial Advisory Group (MAG)</b>
<b>Alwyn Riddell</b>	<b>Chair</b>	<b>MAG Planning Subgroup</b>
<b>Lara Kinneir</b>	<b>Chair</b>	<b>MAG Belfast District</b>

**27/11/15**