

Shaping Sustainable Places Programme Team

Regional Development Office

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Subject: Submission to Shaping Sustainable Places 2025 consultation

Dear Programme Team,

Belfast City Council welcomes the opportunity to respond to the *Shaping Sustainable Places* 2025 consultation and acknowledges the ambition to foster more sustainable, inclusive and resilient communities across Northern Ireland. The Council is broadly supportive of a multi-year, secured approach to funding, recognising its potential to provide greater stability, improve long-term planning, and enhance the impact of local regeneration and community development initiatives. However, whilst we endorse this direction of travel in principle, there are several areas where further clarity is required to ensure the proposed model is both workable and effective in practice. These points of clarification are essential to enable informed planning and to maximise the benefit of further investment. Please find attached our formal response, which outlines both our support for the overarching vision and a number of key issues that we believe must be addressed to ensure successful programme implementation. Please note that this response will be subject to Council Ratification on the 1st October 2025. Officers will confirm the final response post Ratification

Our submission includes:

1. A corporate written statement setting out our overarching response to the consultation proposals.
2. A detailed cross-reference table mapping our response themes to the consultation questions, where applicable.

We trust this submission will be of assistance as the Department works toward finalising the programme design and implementation framework. We remain committed to working in partnership with the Department for Communities, Department for Infrastructure, and Department for Agriculture, Environment and Rural Affairs to ensure that Belfast and all Northern Ireland's cities, towns and villages benefit from transformative place-based regeneration.

Should you require any further information, please do not hesitate to contact us.

Yours sincerely,

Belfast City Council response to the Shaping Sustainable Places 2025 consultation

Introduction

Belfast City Council welcomes the opportunity to respond to the Shaping Sustainable Places 2025 consultation. We support, in principle, the proposal for a multi-year, secured capital funding programme jointly delivered by key government departments; the Department for Communities (DfC), the Department for Infrastructure (DfI) and the Department of Agriculture, Environment and Rural Affairs (DAERA). We recognise the positive potential of a ten-year, £150 million region wide funding pot to drive regeneration, enhance connectivity and deliver high impact place-based change across our communities.

This type of long-term investment is essential to deliver the change required to revitalise our city and tackle the under investment in place-making that Belfast and other areas have experienced.

The Council brings a strong delivery track record aligned to the Belfast Agenda. In addition to delivering its own regeneration and capital programmes, the Council has successfully delivered projects on behalf of central government departments including TEO and DfC. This reflects robust governance, strategic alignment and proven capacity to manage complex regeneration and capital projects. The Council is well placed to act as a trusted delivery partner in shaping and implementing this programme.

However, Belfast City Council has several concerns and areas requiring clarification before we can fully support the approach and prepare effectively for implementation.

A) General support for a multi-year approach

Belfast City Council welcomes the proposal for multi-year secured funding model. This approach would bring much needed stability and enable council to plan, design and deliver complex regeneration and capital projects with appropriate lead-in-times and better value for money.

Further clarity is needed on how funding will be distributed across councils, and whether allocations will reflect the scale, complexity, economic impact and strategic importance of individual areas.

As the capital city and regional economic driver, Belfast faces distinct challenges and opportunities that warrant a proportionate share of investment. The city plays a central role in delivering regional outcomes including strategic economic output and opportunity for growth, housing-led regeneration, connectivity, and climate resilience and any funding model must reflect this. A flat or equal allocation model would risk diluting impact and failing to deliver on programme ambitions.

We recommend that the department engage with councils to co-design an allocation framework that is needs-based, proportionate, and aligned to economic impact and strategic priorities including population density, deprivation levels, impact and capacity to deliver at scale.

To support effective delivery, councils must also have the ability to identify secured funding across multiple financial years. This flexibility is essential to reflect the reality of capital delivery cycles, particularly for public realm and active travel infrastructure schemes, which often span several years and require complex statutory and procurement processes.

It is recommended that a clear implementation process is developed to determine how funding will be rolled out. This should include timelines, governance arrangements, and criteria for project selection and approval. Early engagement with councils will be critical to ensure readiness, alignment with local priorities, and the ability to mobilise delivery at pace.

B) Clarification on departmental aims and additionality

At the recent SOLACE NI meeting, 2 May 2025, Departmental representatives outlined a vision of the fund supporting projects aligned to their existing remits.

However, it remains unclear whether this funding represents new, additional investment, or simply a reallocation of existing departmental budgets to local councils. Further clarity would be required in terms of the departmental delivery plans for strategic projects and how the Shaping Sustainable Places funding would sit alongside this, rather than to compete with this. If the Shaping Sustainable Places programme is designed to enable councils to deliver projects that would normally be delivered by the Executive Departments, then this risks undermining the principle of additionality and passing significant delivery responsibility to councils without an increase in resource or support. Belfast City Council would also question if the level of funding when allocated out among the 11 Council areas would be sufficient to meet the current level of underinvestment.

C) Funding Quantum and Scale

The scale of under investment in Belfast is significant. By way of example, the pre-pandemic cost for Belfast Streets Ahead Phase 3, was c.£30 million. This would equate to three years of the entire regional funding pot, or Belfast's full ten-year allocation.

Belfast currently has multiple major primarily Executive department level schemes pending funding and delivery, for example:

- Belfast Streets Ahead Phases 3 and 5 (DfC).
- Gateway projects at Shankill, Clifton and Fredrick Streets
- Belfast Cycle Network, BRT Phase 2 and other active infrastructure (DfI)
- Under the Bridges, Sailortown Bridge and emerging schemes linked to the Eastern Transport Plan

It is therefore essential that Departments clarify whether this new funding stream will replace historic investment programmes or run alongside them. Without this clarity, there is significant risk that the ambition of the programme will far exceed its funding capacity.

To maximise impact and avoid duplication, it is vital that the Shaping Sustainable Places programme is designed to complement not compete with existing capital commitments. This includes ensuring that funding mechanisms are flexible enough to support co-investment models and that programme criteria recognise the strategic importance of city-led infrastructure delivery. A coordinated approach will enable alignment across government priorities, unlock additional value, and support the delivery of transformational outcomes at scale.

D) Council contributions and governance considerations

While the proposed funding model assumes a further minimum contribution of 10% (approximately £15 million) from Local Councils, it is important to clarify that such contributions cannot be presumed. Councils operate within defined governance frameworks and statutory processes regarding capital expenditure, and any financial commitment must be subject to formal approval through this process. Therefore, while Belfast City Council is committed to working collaboratively with the department and other partners, the programme should reflect an ambition to co-design funding arrangements with councils rather than

assume automatic financial participation. This approach will ensure transparency, respect for local governance, and alignment with council-led investment priorities.

E) Delivery Capacity and Resource Allowances

Effective delivery of complex regeneration projects requires not only robust governance but also sufficient resourcing to navigate statutory approvals and technical processes. Where councils are expected to take a leadership role, resources must extend beyond capital allocation and include dedicated funding for inhouse delivery teams, provision for a management fee to support project management functions, and specialist feasibility development support to prepare capital ready pipelines. To enable this, it is recommended that a portion of funding is ringfenced for early-stage activities including feasibility assessment, design development and meaningful community engagement, ensuring that projects are both viable and deliverable before significant capital spend is committed. It is also proposed that the requested 10% contribution could be assessed in terms of in-kind contribution in terms of staff and resource to deliver, although as above this will also be subject to Councils own governance and approvals process.

Should councils take the lead on these complex projects, resourcing must include:

- Dedicated feasibility and technical development support to prepare capital-ready pipelines. Council recommends that a defined proportion of funding should be ringfenced for early-stage activities, including feasibility assessments, design development and meaningful community engagement prior to the allocation of capital spend.
- Provision for a management fee to support effective delivery.

F) Statutory Approvals Process

Current place-making schemes face lengthy delays due to complex statutory approvals. The new model must address this, potentially through streamlining processes or prioritising cross-departmental/Council approvals. If DfI is no longer the direct delivery body, its level of obligation and responsiveness to approval processes must be reviewed to avoid setbacks.

A coordinated statutory approvals framework, supported by departmental leadership, will be key to unlocking delivery at pace. This includes clarifying roles, streamlining processes, and ensuring that all enabling partners including funders and utilities are actively engaged from the outset.

G) Role of DAERA in urban regeneration

The current document provides limited insight into DAERA's potential interventions in Belfast. Whilst DAERA'S remit has traditionally been centred on rural regeneration, the implementation of climate mitigation and risk measures within capital projects is strategically significant for the city's future resilience

Further clarity is required on how DAERA'S investment will directly support the outcomes in Belfast, particularly in relation to the delivery of climate mitigation and adaptation infrastructure.

Ensuring that Belfast is adequately assessed and resourced within DAERA's framework will be essential to embedding sustainable regeneration practices and meeting long term climate change objectives.

H) Competitive funding streams

We support the use of thematic competitive funding (e.g. heritage assets, climate resilience, and economic centres) as a means to catalyse targeted investment and unlock place-based economic potential. These thematic streams can stimulate local enterprise, attract co-investment, and accelerate regeneration outcomes when aligned with strategic priorities. However, it is important to highlight that competitive mechanisms must complement and not compromise the foundational funding required to plan and deliver coherent programmes at scale. The assessment criteria needs to clearly set out how projects would be evaluated, with a particular focus on the economic impact of the investment to ensure the greatest delivery of benefit.

I) Mid-term review and evaluation

We recommend that an embedded, structured mid-term review mechanism is established to assess progress, measure impact, and enable course correction where necessary. This approach would reinforce accountability, strengthen transparency and ensure that delivery models remain responsive and adaptable to evolving local contexts. By building in a formal review stage, programmes can better align resources with outcomes and maintain momentum

over the full investment cycle. This review would need to be subject to Council input, including through Councils own governance and approval process.

Cross-Referenced Summary of Responses to Consultation Questions

QUESTION	RESPONSE
Q2. To what extent do you agree with the proposed vision for Shaping Sustainable Places Q4. To what extent do you agree with the proposed principles for Shaping Sustainable Places	Agree - We broadly support the proposed vision for Shaping Sustainable Places 2025, particularly its emphasis on place-based regeneration, early community engagement, and collaborative delivery models. These principles strongly align with the ambitions set out in the Belfast Agenda 2024–2028, which articulates a shared vision of Belfast as a city. The Belfast Agenda prioritises inclusive growth, neighbourhood regeneration, and climate resilience, each of which is echoed in the Shaping Sustainable Places vision. In particular, the commitment to engaging communities at the earliest stages of planning reflects Belfast’s own community planning ethos, which seeks to bring decision-making closer to residents and ensure that regeneration delivers tangible benefits for local people. However, we would emphasise the importance of ensuring that the proposed programme is underpinned by sufficient core funding and long-term delivery mechanisms. This is essential to avoid fragmented interventions and to support the kind of sustained, citywide transformation envisaged in both the Belfast Agenda and the Shaping Sustainable Places framework. To ensure the programme remains on track and delivers meaningful impact, we recommend a structured mid-term review and evaluation

	process. This will be critical in assessing progress against outlined targets, identifying areas for adjustment, and reinforcing accountability throughout the programme's lifecycle.
Q6. Do you agree with the timeframe proposed for Shaping Sustainable Places	Agree— The ten-year term is welcome, but its success hinges on realistic planning assumptions, early-stage capacity building, and mechanisms for ongoing review and course improvements. We support the ambition of the proposed ten-year timeframe for Shaping Sustainable Places, recognising the value of long-term planning and the opportunity to deliver transformational place-based regeneration at scale. This aligns with the strategic priorities set out in the <i>Belfast Agenda 2024–2028</i>, which champions sustained investment in the city centre, neighbourhood renewal, climate resilience, and inclusive growth. A decade-long delivery window also corresponds with Council's experience of managing complex infrastructure and regeneration projects, where realistic time frames are essential for achieving meaningful outcomes. However, we would reiterate the need for a flexible and phased approach to programme implementation. As outlined in our submission, appropriate lead-in time for feasibility studies, statutory approvals, and collaborative design will be critical, particularly where delivery responsibility sits with Local Councils. It is also essential that the programme incorporates a mid-term review, enabling both the department and councils to respond to evolving local contexts and evaluate delivery progress.
Q8. To what extent do you agree that Shaping Sustainable Places should be developed through a place-making process.	We strongly agree that Shaping Sustainable Places should be developed through a place-making process. This approach is consistent with the council's commitment to community-led regeneration, as articulated in the <i>Belfast Agenda 2024–2028, the LDP, and the recent Belfast City Regeneration and Investment Stocktake</i> which highlights the critical areas of focus to drive catalytic change including increasing city centre living, delivering a Bolder Vision, unlocking major regeneration schemes and delivering a multi-agency approach to place keeping and city

	management. A place-making process enables early and meaningful engagement with local communities, ensuring that interventions consider the needs, and aspirations of those communities. It also supports integrated planning essential foundation for delivering sustainable, inclusive outcomes at scale.
Q10. To what extent do you agree or disagree that the Living High Streets Craft Kit would be a good approach to use to plan sustainable places.	We agree that the Living High Streets Craft Kit represents a valuable and innovative approach to planning sustainable places; however its real benefit is contingent upon the Craft Kit being appropriately resourced and tailored to the local context. Local community and business capacity to engage with the Craft Kit, as well as the continued role of DfC as the Regeneration Authority will also be critical to the successful delivery of the Craft Kit. The Craft Kit’s emphasis on community-led co-design, asset-based thinking, consistent engagement aligns closely with Belfast City Council’s regeneration ethos and the principles set out in the <i>Belfast Agenda 2024–2028</i>. It encourages local stakeholders to explore the place making principles fostering a shared understanding of needs and opportunities. This approach has already demonstrated practical value in pilot areas such as Downpatrick, Greater Shankill and the development of the vision for the Newtownards Road, where it supported collaborative visioning and action planning. However, the level of resources, facilitation and capacity within the particular areas are also determining factors. There is also a risk of raising local area expectations in relation to the implementation of plans, particularly in view that these plans are not matched by adequate levels of resource or capital to deliver. To maximise its effectiveness, the Craft Kit must be embedded within a broader delivery framework that includes facilitation support, capacity-building and integration with statutory planning processes, along with a sustainable approach to implementation

Q12. If your Local Council or community has already developed a plan for your place, to what extent do you agree or disagree that this existing plan should be used instead of developing a new plan using a place-making approach.	Strongly Agree –Belfast City Council has invested significant time and resources in developing a range of strategic and community-led plans such as the <i>Belfast Agenda, Local Development Plan, A Bolder Vision</i> and the Belfast City Centre Regeneration Investment Strategy, along with area-specific regeneration frameworks which reflect extensive stakeholder engagement and align with the principles of place-making. Requiring communities or councils to restart planning processes where robust plans already exist would risk duplication, consultation fatigue, and delays in delivery. Instead, the Shaping Sustainable Places programme should adopt a flexible approach that allows existing plans to form the foundation for investment, while still enabling refinement and co-design where appropriate.
Q14. To what extent do you agree or disagree with “ Investing in public realm in village, town and city centre” as an objective when focusing on Place?	We strongly agree that investing in the public realm across villages, towns, and city centres is a critical objective when focusing on Place. High-quality public realm enhances the attractiveness, accessibility, and functionality of our city environments, encouraging footfall, supporting local businesses, and fostering civic pride. This aligns with Belfast City Council’s regeneration priorities. On its own public realm is not enough but needs to be aligned with sustainable and active travel provision, climate mitigation measures and addressing dereliction and vacancy in urban centres.
Q15. To what extent do you agree or disagree with “Increasing occupancy levels by vacant buildings or derelict sites coming back into use” as an objective when focusing on Place?	We strongly agree with the objective of increasing occupancy levels by bringing vacant buildings and derelict sites back into use. Addressing vacancy and dereliction is essential to reversing decline of buildings, improving perceptions of place, and unlocking underutilised assets for housing and other uses. This objective reflects longstanding council concerns about underinvestment and aligns with our commitment to tackling vacancy and promoting sustainable reuse of the built environment.

	This ambition is directly aligned with the Belfast City Centre Regeneration and Investment Strategy (BICCRIS), which prioritises the revitalisation of the city core through targeted investment, improved connectivity, and the reactivation of underused assets. It also complements the Council's Vacant to Vibrant programme and the emerging H.O.U.S.E Programmes. The Vacant to Vibrant Programme provides financial and advisory support to bring vacant properties back into productive use whilst the H.O.U.S.E programme is a future programme currently being explored to bring vacant spaces on the upper floors forward for residential use. Together, these initiatives demonstrate Belfast City Council's proactive approach to tackling vacancy and delivering inclusive, place-based regeneration. Subject to funding these programmes can continue to deliver a substantial return on investment through the Rates, as well as delivering desirable benefits of increasing employment, economic activity, footfall, vibrancy, and delivering on the draft PFG.
Q16. To what extent do you agree or disagree with "Creating more productive local economies" as an objective when focussing on Place?	We agree that creating more productive local economies should be a core objective of place-based regeneration, provided that this approach is taken in tandem with proportionate support for areas of strategic and regional economic output. Supporting local enterprise, enhancing skills, and enabling inclusive economic growth are central to the Belfast Agenda 2024–2028 and the Belfast City Centre Regeneration & Investment Strategy
Q18. To what extent do you agree or disagree with "Improving safety in village, town and city centres" as an objective when focusing on People?	We agree that improving safety in village, town, and city centres is a vital objective when focusing on People. A sense of safety is essential for fostering community wellbeing, supporting economic growth, and ensuring inclusive opportunities for all. This aligns with the Belfast Agenda 2024–2028, which prioritises creating a welcoming, vibrant, and connected city where everyone feels secure and valued. Belfast City Council has consistently supported initiatives that enhance public safety—such as

	improved lighting, active travel infrastructure, and collaborative approaches to tackling anti-social behaviour. These efforts are not only about reducing crime but also about fostering environments where people feel confident to live, work, and socialise. To be effective, this objective must be targeted towards the centres with greatest economic return, strengthening our city centres as well as local centres. Funding to support this will be essential, and it will also need to be supported by cross-sectoral partnerships, underpinned by data-informed interventions.
Q19. To what extent do you agree or disagree with "Creating more active and sustainable infrastructure and facilities" as an objective when focusing on People?	We strongly agree that creating more active and sustainable infrastructure and facilities is a vital objective when focusing on people. This aligns with Belfast City Council's strategic priorities, particularly those outlined in the <i>Belfast Agenda 2024–2028, A Bolder Vision, the LDP, BCRRIS</i> and the <i>Resilience Strategy</i>, which emphasise climate action, health and wellbeing, and inclusive mobility. Active and sustainable infrastructure such as walking and cycling networks, green transport corridors, and energy-efficient community facilities not only supports environmental goals but also enhances quality of life, promotes healthier lifestyles, and improves access to services. These outcomes are especially important in addressing inequalities and ensuring that regeneration benefits all communities. To be effective, this objective must be supported by long-term investment, integrated planning across departments, and strong community engagement. It also requires alignment with existing strategies such as the Belfast Cycle Network and Eastern Transport Plan, ensuring that infrastructure is not only sustainable but also responsive to local needs and aspirations.
Q20. To what extent do you agree or disagree with "Reducing car dominance" as an objective when focusing on People?	We agree that reducing car dominance is an important and necessary objective when focusing on People. This aligns with Belfast City Council's

	strategic priorities around sustainable mobility, climate action, and inclusive access, as outlined in the <i>Belfast Agenda 2024–2028, A Bolder Vision, the LDP, BCRRIS</i> and the <i>Resilience Strategy</i>. Reducing car dominance supports healthier, more connected communities by encouraging active travel, improving air quality, and reclaiming public space for people rather than vehicles. It also helps address transport inequality by prioritising infrastructure that benefits those without access to private cars. However, this objective must be implemented in a way that is sensitive to local context particularly in relation to transport access, public transport availability, and the needs of residents and businesses. To be effective, this ambition should be supported by investment in active and sustainable transport infrastructure, integrated land-use planning, and behavioural change initiatives. It must also be accompanied by clear communication and engagement with communities to ensure that changes are inclusive, equitable, and widely supported.
Q22. To what extent do you agree or disagree with “Creating or growing existing green spaces” as an objective when focusing on Planet?	We strongly agree that creating or enhancing green spaces should be a core objective when focusing on Planet. This aligns with Belfast City Council’s strategic priorities around climate resilience, biodiversity, and environmental wellbeing, as outlined in the <i>Belfast Agenda 2024–2028, A Bolder Vision, the LDP, BCRRIS</i> and the <i>Resilience Strategy</i>. Green spaces play a vital role in addressing climate impacts by improving air quality, managing surface water runoff, and promoting biodiversity. They also provide essential benefits for people enhancing mental and physical wellbeing, encouraging active lifestyles, and fostering social cohesion. In Belfast, where access to quality green space is uneven, targeted investment in both the creation of new spaces and the enhancement of existing ones is vital. This objective must be supported by

	long-term funding, community co-design, and integration with wider regeneration and infrastructure strategies to ensure that green infrastructure delivers maximum environmental and social value. However, there needs to be immediate progress made in terms of how this is embedded into the road infrastructure, including ownership, operation and maintenance plans. Failure to address this will lead to a failure to deliver green infrastructure.
Q23. To what extent do you agree or disagree with “Building infrastructure that is more resilient to the effects of climate change” as an objective when focusing on Planet?	Strongly agree. Building climate resilient infrastructure aligns closely with Belfast City Council’s strategic priorities, particularly its commitments to climate adaptation, sustainable development and creating a more inclusive, low carbon city. Resilient infrastructure is essential to protecting communities, supporting economic growth and ensuring long term environmental sustainability. However, there needs to be immediate progress made in terms of how this is embedded into the road infrastructure, including ownership, operation and maintenance plans. Failure to address this will lead to a failure to deliver green infrastructure.
Q24. To what extent do you agree or disagree with “Ensuring buildings brought back into use are more energy efficient” as an objective when focusing on Planet?	Strongly agree. Ensuring that buildings are brought back into use supports Belfast City Council’s strategic priorities around sustainable regeneration, climate action and reducing carbon emissions. Reutilising underused spaces could contribute to the ambitious aims outlined in the Belfast Agenda, <i>A Bolder Vision</i>, <i>the LDP</i>, <i>BCRRIS</i> to increase the city centre population. By way of an example, creating homes from spaces within buildings that are vacant has a number of benefits, not only reducing emissions but reducing housing stress, preservation of buildings, supporting economic revitalisation, enhancing city vibrancy and safety, enhancing community well-

	being and attracting further investment and reducing vacancy right across the city.
Q26. Do you feel the partnership working to deliver these previous regeneration schemes were successful?	Yes, Belfast City Council considers previous partnership working on regeneration schemes to have been broadly successful. Initiatives such as the Covid Recovery Revitalisation Programme and the tri-Departmental collaboration between DfC, DfI, and DAERA have demonstrated the value of coordinated, cross-governmental approaches to place-based investment. These partnerships enabled timely delivery of capital projects, supported local businesses, and enhanced public spaces during a period of significant challenge. The council's experience shows that effective partnership working grounded in shared objectives, clear governance, and sustained commitment can deliver tangible outcomes for communities. However, continued success depends on maintaining strong interdepartmental coordination, ensuring clarity of roles and responsibilities, and embedding local government as a strategic delivery partner from the outset. This includes, for example, streamlining the statutory approval process, along with overcoming the current barriers to delivering climate migration measures and green infrastructure. This collaborative ethos is also reflected in the <i>Belfast Agenda 2024–2028</i>, which emphasises co-design, inclusive growth, and integrated delivery as core principles for regeneration. Going forward, it will be essential to build on these foundations and ensure that future programmes like Shaping Sustainable Places are underpinned by the same level of partnership ambition and operational alignment.
Q28. Do you think other partners should be involved in delivering Shaping Sustainable Places?	Yes, Belfast City Council believes that broadening the partnership base is essential to the successful delivery of Shaping Sustainable Places. While the tri-Departmental collaboration between DfC, DfI, and DAERA provides a strong foundation, the complexity and ambition of the programme require a wider cohort of delivery partners.

	We recommend the inclusion of: • Northern Ireland Housing Executive (NIHE) to align regeneration with housing-led renewal and address vacancy and dereliction initiatives. • The Community Planning Partnership to align impact to the Belfast Agenda. • Utility providers (e.g. NI Water, NIE Networks) to ensure infrastructure readiness and support integrated planning. • Community and voluntary sector organisations to embed local knowledge, build trust, and support inclusive delivery. • The role of the Private Sector & other city stakeholders, eg. Universities, also needs to be considered in terms of bringing forward delivery and funding at scale By involving a broader range of partners, the programme can better respond to local needs, unlock additional resources, and deliver more holistic, sustainable outcomes.
Q30. To what extent do you agree that the regeneration of villages, towns and city centre should be a long-term strategic priority, with security of funding, for the Northern Ireland Executive and Local Councils?	We strongly agree that the regeneration of villages, towns, and city centres should be a long-term strategic priority, underpinned by secure, multi-year funding for both the Northern Ireland Executive and Local Councils, measured against the economic impact of the investment. This needs to be done through an agreed framework for budget allocation which considers need and the economic impact of investment. In the past decade the level of investment in town and city centres has been grossly underfunded in Northern Ireland, further hampered by in year funding constraints. In other regions within the UK local towns and cities are able to plan on a multi-year bases, and have the ability to draw on additional regeneration funding streams that do not translate to Northern Ireland. This has left the region at a distinct disadvantage in attracting investment in comparison to other regions in the UK. In line with the Place Based Growth Proposition securing additional funding beyond the

	normal funding structures will be critical and should become a strategic priority to addressing the current level of underinvestment. This position is firmly aligned with the Belfast Agenda 2024–2028, BCCRIS and ABV, which emphasises inclusive growth, neighbourhood renewal, and sustainable infrastructure as key levers for improving quality of life and economic resilience. Long-term regeneration is not only essential for addressing historic underinvestment particularly in public realm, connectivity, and community assets but also for enabling councils to plan and deliver complex, multi-phase capital projects with confidence and coherence, to enable city centres to deliver on their growth outcomes and to contribute to the draft PfG. As highlighted in Belfast City Council’s response to the Shaping Sustainable Places consultation, the scale of ambition must be matched by funding certainty. This level of funding certainty must be in line with the levels and types of funding that other major UK cities can avail of. Without it, there is a risk of fragmented delivery, missed opportunities for co-investment, and diminished community trust. A strategic, well-funded approach allows for meaningful community engagement, robust design development, and the kind of sustained transformation for Belfast.
Q32. To what extent would you support the establishment of competitive funding opportunities to tackle specific regeneration issues?	Council supports the establishment of targeted competitive funding opportunities as a complementary mechanism to core allocations within the Shaping Sustainable Places programme. although the Council supports this within an agreed framework of budget distribution across Councils based on regeneration need, economic impact and ability to deliver. When designed effectively, such funds can stimulate innovation, address place-specific challenges, and unlock co-investment from public, private, and community partners but this should be measured against tangible outcomes and impacts. However, as noted in Belfast City Council’s consultation response, it is essential that these place based opportunities do not undermine the

	base funding required to plan and deliver coherent, long-term regeneration programmes at scale. The assessment criteria needs to clearly set out how projects would be evaluated, with a particular focus on the economic impact of the investment to ensure the greatest delivery of benefit.
Q34. Are there any specific regeneration issues or themes in your local area you feel could be tackled most effectively by the establishment of a competitive funding opportunity?	In the Belfast context, several regeneration issues and themes could be well-suited to competitive funding, including: • Vacancy and Dereliction • Reactivation of historic buildings and vacant upper-floor space – to support heritage-led regeneration, to revitalise the city centre and the wider area, and to increase city centre population. • Unlocking major regeneration schemes as identified within the BCCRIS Stocktake. • Sustainable and Active Travel Delivery, Public Realm and Connectivity • Adaptation infrastructure – to enhance climate resilience and support the delivery of the Resilience Strategy, supported by a cross-departmental and statutory authority agreement in terms of how this infrastructure can be delivered, and maintained on a long-term sustainable basis.
Q35. Please select from the list below your top 5 preferences that you consider to be the most important criteria when prioritising places for intervention through Shaping Sustainable Places	Based on Belfast City Council’s strategic priorities and the themes outlined in the <i>Belfast Agenda 2024–2028</i>, the following five criteria are considered most important when prioritising places for intervention through <i>Shaping Sustainable Places</i>: 1. High levels of vacancy and dereliction – Addressing underutilised assets, land and buildings is essential to reversing decline, improving perceptions of place, unlocking regeneration potential and reducing housing stress through the adaptive reuse of assets for economic purposes. 2. Need for improved infrastructure – Investment in transport and green

	infrastructure is critical to enabling inclusive growth and climate resilience. 3. Measuring Economic impact and return on investment. 4. Access to opportunity for residents of surrounding areas – Enhancing connectivity across the city and removing barriers supporting wider regional development and social inclusion. 5. Potential to leverage private sector investment – Targeting areas with co-investment potential maximises the impact of public funding and supports long-term sustainability.
Q36. To what extent would you support the adoption of a Centre First Policy for the location of public sector jobs and services in Northern Ireland?	We support the adoption of a Centre First Policy to encourage development in central urban areas to support vibrant, accessible and economically active cores. A Centre First Policy could discourage the spread of out-of-town retail, commercial or residential development. It would support the revitalisation of the city centre and address vacancy and dereliction that could be a catalyst for further investment. In Belfast this this could help drive footfall, support local businesses, and enhance the vibrancy and resilience of the city core. For Belfast, this approach complements ongoing efforts to revitalise the city centre, reduce vacancy, and promote sustainable travel patterns by concentrating activity in accessible, well-connected locations. However, successful implementation will require coordinated planning across departments, alignment with transport and infrastructure strategies, and consideration of local context to ensure that the policy delivers inclusive benefits across all settlement types. When embedded within a broader place-making framework, a Centre First approach can act as a powerful lever for economic regeneration and spatial equity.

