

Submitted to **Belfast LDP 2035 - Plan Strategy**

Submitted on **2018-11-06 12:43:19**

Overview

1. Data Protection

Q1. Please tick to confirm that you have read and understood the privacy notice above.

I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

Q2. Do you consent for us to publish your response?

Yes, but without any identifying information

2. Your details

Q3. Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

Individual, Organisation or Agent:

Organisation

Q4. What is your name?

Title:

[REDACTED]

Full Name:

[REDACTED]

Q5. What is your telephone number?

Telephone number:

[REDACTED]

Q6. What is your email address?

Email:

[REDACTED]

Q7. Did you respond to the previous Preferred Options Paper consultation phase?

Unsure

If yes, and you have your previous response ID (beginning ANON) please enter it here::

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

[REDACTED]

Your Job Title:

[REDACTED]

Address Line 1:

[REDACTED]

Line 2:

Line 3:

City:

[REDACTED]

Postcode:

6. Before you submit your comments

7. Is the plan sound?

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

Q12. Do you consider the Plan Strategy to be sound or unsound?

I believe it to be unsound

8b. Unsound

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

5.1.3

Policy (if relevant):

HOU5 Affordable Housing

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C2 - Did the council take account of its Community Plan?, CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base, CE3 - There are clear mechanisms for implementation and monitoring

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Belfast is amid a massive housing crisis; homelessness has increased by a third in the last 5 years and is only building one home for every 23 new residents . Within the new LDP strategy '31,600 new homes are proposed over the 15-year plan period' , however it is not clarified how the allocation of housing land 'through the settlement hierarchy' will correlate to areas of housing stress. There is a high and sustained social housing need in some of the existing city neighbourhoods, with an extensive waiting list and low level of turnover, particularly for family accommodation. The LDP supports the Belfast Agenda's ambition of population growth by 66,000 additional people over by 2035. However, the emphasis seems to be more on the population growth than on the existing residential areas and neighbourhoods. Similarly, the provision of housing appears to be a tool to facilitate economic growth rather than re-integrating and sustaining communities.

Similarly, LDP should highlight the provision of homes for those in need of supported living accommodation. A target of 10% of the 31,600 new housing stock should be made available for this cohort. In the same way that any development of over 5 units seeking planning permission must have 20% of the stock allocated to social / affordable housing, there needs to be a similar rubric in place to manage and measure how we provide supportive living accommodation for those with disabilities who will be coming to live in the city.

The SPSS states that the LDP should provide for a "managed release of housing land, in line with a 'plan, monitor and manage' approach". The current LDP draft however does not provide any framework for Monitoring of housing delivery which is critical to the implementation of the district's growth strategy.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

It is questionable why LDP makes no reference to the Troubles and its spatial legacy. Addressing these spatial disadvantages requires an integrated policy approach. At the heart of this approach lies strengthening human rights and equality by involving the existing communities in articulation of their housing needs and priorities. To do this, the LDP should engage with housing as an entry to the wider social and spatial regeneration within Belfast City. By re-stitching the divided communities to the city through housing-led regeneration, LDP should advance connectivity and sustainability of existing city neighbourhoods and hence promote a vibrant and pluralist urban future.

LDP should facilitate development of a community-led housing solution that is owned and managed by the local communities. Developed in an inclusive and integrated manner, the community-led housing policy will contribute to reducing social inequalities and strengthen sustainable regeneration in the area. In order to facilitate a community-led housing policy LDP could facilitate a Participatory Budgeting exercise to allocate the required funds based on the housing choices of the local communities.

It will have a range of additional impacts such as enhancing the quality and design of existing city neighbourhoods, strengthening security of tenure conditions for many, improved public space, livelihood generation, improved social services and urban safety. By driving regeneration & sustaining communities through housing, LDP could facilitate long-term enhancement of the economic, social and cultural rights of the working-class neighbourhoods and therefore facilitate the

societal transformation in the NI.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Second Submission

Q14b. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

Policy (if relevant):

EC1 Delivery Economic Growth

Q15b. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C2 - Did the council take account of its Community Plan?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16b. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Q17b. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

Any major new investment in retail development in Belfast City should include a mandatory clause ensuring the provision of a sensory room/ quiet space within the retail development, to accommodate the needs of those children and young people with autism or sensory disorders.

Any major investment in retail development in Belfast City should include a mandatory clause ensuring the provision of a changing facility/ mat, for adults with disabilities, who are unable to toilet themselves, and who need appropriate nappy changing facilities.

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Q18b. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Third Submission

Q14c. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

Policy (if relevant):

SP8 Green and Blue Infrastructure Network

Q15c. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C2 - Did the council take account of its Community Plan?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

Q16c. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Q17c. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

Open spaces and green areas should be designed and developed with the needs of those with sensory and developmental disabilities in mind. For example, there should be designated spaces in the city for sensory gardens which are accessible and enjoyable for both disabled and non-disabled users. A sensory garden, for example, may contain features accessible such as: scented and edible plants, sculptures and sculpted handrails, water features designed to make sound and play over the hands, textured touch-pads, magnifying-glass screens, braille and audio induction loops descriptions. Depending on the user group, other provisions may integrate sound and music more centrally to combine the play needs of younger users with their sensory needs.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18c. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fourth Submission

Q14d. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

Policy (if relevant):

SP5 Positive Place Making

Q15d. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

CE3 - There are clear mechanisms for implementation and monitoring

Q16d. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Considering that the LDP is to guide investment and set out policies and proposals for the use, development and protection of land across the city, it is questionable why the document does not engage with dereliction in a comprehensive approach. LDP refers to the possibility of re-appropriating 'vacant shops, surplus public buildings and derelict land' for small scale business uses however it does not provide any framework or policy guideline to address dereliction which is a major issue for number of communities in Belfast including the Market, Donegal Pass, Sandy Row, Lower Ormeau and Greater Village area. The last study on dereliction in Belfast which compiled a list of dangerous and dilapidated structures for use was carried out by Building Control in 2013 and there are currently no plans to undertake an updated study.

Q17d. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

In the absence of any solid plan to address mapping dereliction in the city, LDP should provide a framework for coordinated engagement with land and property services, BCC, DoI and other stakeholders to address the issue of vacancy and dereliction. Similarly, it should drive a regeneration strategy through the adaptation and re-use of vacant and under-utilised land and buildings, particularly as part of mixed-use developments. Shaping a Liveable Place requires addressing issue of dereliction and underutilised buildings which would in return facilitate population growth and economic prosperity.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18d. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fifth Submission

Q14e. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

9.4.32

Policy (if relevant):

TRAN10 Design Of Car Parking

Q15e. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C2 - Did the council take account of its Community Plan?, CE3 - There are clear mechanisms for implementation and monitoring

Q16e. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

Over 100,000 people travel into Belfast to work every day, many of whom park in inner city neighbourhoods causing a range of environmental, social and health problems for inner city residents. Car Parking Strategies and Resident's Parking schemes are integral in addressing the high levels of commuter parking and should be prioritised in the short term to manage the aim of growing the population of the City and in achieving an improved environmental quality and protecting communities from harm. Considering that the majority of existing city neighbourhoods tackle with issues concerned with commuter parking, LDP has failed to clarify the role of Belfast City Council in leading the Car Parking Strategy. Similarly, no reference is given to any existing funding or resources and whether and how BCC is working with DfI and residents to consider the resident parking schemes and on-street parking scheme for businesses. The LDP notes that 'to tackle growing congestion problems and help reduce reliance on the private car the council considers that in certain instances it will no longer be appropriate or desirable for developers to fully meet demand for car parking generated by their developments. Where parking reduction is considered acceptable in principle, the council will negotiate the precise level of reduction with developers'; the 9.4.32 clause however gives no reference on what criteria will be used to identify the right level of reduction and whether there will be local consultations on this matter.

Q17e. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

In reducing the commuter parking, one recommendation could be that the Belfast bicycle scheme could fill the gap between park n ride schemes and city centre, so that residents closer to the city centre would have the opportunity to use the bicycle scheme instead of private cars. Belfast Bikes should also extend its range of offerings and include hire of adapted bikes to enable those with a range of disabilities to get around the city. Secondly there need to be investment on crosstown and inter-linking routes which currently forces people to use cars rather than public transport.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18e. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Sixth Submission

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

Policy (if relevant):

SP5 Positive Place Making

Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

C2 - Did the council take account of its Community Plan?

Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

The format through which the current consultation on the LDP is conducted is limited to the soundness (procedural, consistency, coherence and effectiveness tests) of the LDP. Hence the emphasis on consultation is on the actual process rather than the LDP Draft Plan Strategy itself, and this has made it difficult for many local people and organisations to voice the issues which matter most to them. Communities need to be able to elaborate their concerns and priorities in their own terms and not in the defined preset template by council, which is hard to understand and respond for most people.

Belfast City Council state "We are responsible for developing a local development plan for Belfast, working with local people, to create a clear vision of how the council area should develop and what it will look like in the years to come". Community representatives have recurrently shed light on the existing participation barriers and highlighted the need for provision of specialist support and technical assistance to ensure meaningful engagement of communities. Many people do not have access to the planning materials or are unable to access a computer, and in many cases, do not have the technical skills or expertise to respond to the issues concerned with planning applications and design.

The meaningful consultation requires "turning the tables from top down planning, open a deeper dialogue and engagement inviting local communities and citizens to shape the future of our city in dialogue with arts & culture, health, education sector, local authorities and private sector including SMEs and developers" Leave No One Behind – Co-Creating Our City.

Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

To bring community's voices to the forefront of the urban discussion, Belfast City Council needs to invest in capacity building resources to assist citizens and local organisations in articulating needs and priorities of local communities. This could be achieved through participation and engagement workshops developed through a co-design approach with a range of groups such as community development workers, regeneration practitioners, architects, urban designers, place makers, young people as well as Partnerships.

There is a lack of clarity on the next steps of the Local Development Plan process, particularly in relation to participation in the Local Policies Plan. The Preferred Options Paper does not provide enough consultation for the latter part of the process and an in-depth consultation with Belfast citizens, community and voluntary groups, youth groups, educational institutions and universities, neighbourhood and area partnerships are required to identify land use across Belfast and moving forward with the Local Development Plan.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

No

9. Type of Procedure

Q18. Please indicate if you would like your representation to be dealt with by:

Written representations