

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

Submitted on **2018-11-15 16:38:38**

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?

Yes

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:

[REDACTED]

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::

2.3 District profile Environmental

Policy (if relevant):

SP8 Green and Blue Infrastructure Network

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:

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, C1 - Did the council take account of the Regional Development Strategy?, C2 - Did the council take account of its Community Plan?, C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

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:

Whilst only a profile it fails:-

To cite the profusion of urban landscape wedges that exist within the city.

Only street trees are mentioned. Not the incidence/ numbers of trees that are currently within the city.

Not all environmental designations are listed here. For example, Sites of Local nature Conservation Interest

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?:

As above

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:

5.1.3

Policy (if relevant):

SP1 Growth Strategy

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:

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

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:

This is a far too ambitious figure of 31,600 homes over the 15 year plan period from 2020-2035. Current build rates are significantly lower and if extrapolated over 15 years will fall far below this 311,600 target.

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?:

Create realistic, sustainable targets modeled on current build rates.

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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::

5.3.2/5.3.3

Policy (if relevant):

SP3 Improving Health and Wellbeing

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:

Whilst SP3 is a highly commendable strategic policy there is unfortunately no inference drawn or presumption enunciated against the building on greenfield sites on the urban fringes. This should have been made clear in 5.3.2.

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?:

Emphasis should be on inner city brownfield development as the key number one priority.

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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::

5.8.2

Policy (if relevant):

SP8 Green and Blue Infrastructure Network

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:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

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:

Strongly agree with and support SP8 green and blue infrastructure. Unfortunately paara 5.8.2 does not mention the importance of existing urban landscape wedges which also serve as community greenways.

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?:

Ensure Urban Landscape Wedges such as Lagmore Glen are fully protected from development, and regardless of whether they are in public or private ownership, they act as an integral part of the green and blue infrastructure. The green and blue infrastructure network planning designation should take precedence over all other planning permissions.

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:

Policy HOU1 and Policy HOU2

Policy (if relevant):

HOU2 Windfall Housing

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:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, 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

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 optimistic figures for average dwellings completed per annum. Why the sudden increase in 2025 and then in 2030? Seems like wishful thinking.

Windfall figure of 2000 is extremely low and does not reflect past experience in Belfast (seen by "unusually high proportion of housing being classified as windfall"). Plan fails to accentuate the fluid, dynamic, ongoing nature of windfall allocations and is therefore unrealistic. Definitely disagree with 7.1.8 . Due to its dynamic nature windfall is in essence unplanned but an essential, key main contributor to creating additional housing. Very important that a correct figure for windfall is calculated, especially as it could grossly and erroneously inflate the demand/need for greenfield housing . Evidently, the calculations and assumptions within the Housing Technical Supplement are wrong.

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?:

Revise the Housing Technical Supplement to increase windfall figure projections within the plan.

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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:

7.2.20

Policy (if relevant):

DES2 Master planning for Major Development

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:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, 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:

Section H of Policy DES2 does not adequately define or specify an acceptable, appropriate landscape management and maintenance plan. Our concern is that in respect to many large developments the landscape management and maintenance plan may only consist of a 1 page document which will be totally inadequate, failing to meet the necessary site requirements, and will have been only completed as a mere tick box exercise.

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?:

Correct evaluation and monitoring of landscape management and maintenance plans to ensure that they fully complement the scale of the development. They should conform to an acceptable, innovative national urban design standard.

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 - Seventh Submission

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

Relevant Section or Paragraph::

7.3.14

Policy (if relevant):

RD1 New Residential Developments

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:

CE3 - There are clear mechanisms for implementation and monitoring, CE4 - It is reasonably flexible to enable it to deal with changing circumstances

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:

There is a serious problem with residential management companies, how they are set up, run, finances and their overall effectiveness. This is an area which needs to be addressed. There is a report gathering dust on multi- unit developments, compiled by the NI Law Commission sitting in Stormont which has not been acted upon.

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?:

Talk to the NI Law Commission.

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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 - Eighth Submission

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

Relevant Section or Paragraph:

7.6.5

Policy (if relevant):

HC1 Promoting Healthy Communities

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:

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, 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:

How do we know that s76 planning agreement will be effective? There has been a poor performance with Article 40 planning agreements.

Will HIA just be another tick box exercise.

Developers have too often paid lip service to promoting healthy and active lifestyles. No segregated cycle lanes, limited public access and poor connectivity.

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?:

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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 - Ninth Submission

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

Relevant Section or Paragraph:

7.7.5

Policy (if relevant):

CI1 Community Infrastructure

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, CE4 - It is reasonably flexible to enable it to deal with changing circumstances

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:

Strongly agree with "no unacceptable impact on residential amenity or natural/ built heritage" and "presumption against the development of existing community

infrastructure or lands identified for such use for alternative uses."

Will S76 planning agreements work? Poor history/performance with Article 40 planning agreements. Developers have grossly under provided when it comes to installing the appropriate community infrastructure. Too many residential developments have become concrete jungles devoid of the necessary community infrastructure. New approach is required urgently.

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?:

Community infrastructure along with green and blue infrastructure have been seen as the Cinderella when it comes to planning. They have always been an afterthought with scant resources and monies provided. Yet they are extremely vital to the overall development of an exciting, dynamic, vibrant city that is accessible and open to all.

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 - Tenth Submission

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

Relevant Section or Paragraph:

Policy ITU 3

Policy (if relevant):

ITU3 Electricity and Gas Infrastructure

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?, C3 - Did the council take account of policy and guidance issued by the Department?, C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, 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, CE4 - It is reasonably flexible to enable it to deal with changing circumstances

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:

As can be seen from the Paris Agreement too much emphasis on fossil fuel development will destroy our planet. Key is renewable energy solutions including wind, solar, biomass and recycling.

I HAVE GOT TO THE 10TH SUBMISSION BUT WHEN I PRESS CONTINUE IT AUTOMATICALLY GOES TO THE FINAL STAGE AND DOES NOT ALLOW ME TO FINISH MY SUBMISSIONS.

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?:

Fossil fuel exit strategy.

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

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9. Type of Procedure

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

Written representations