

Submitted to **Belfast LDP 2035 - Plan Strategy**  
Submitted on **2018-11-15 12:00:08**

## 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, with my name and/or organisation

### 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:**

Individual

**Q4. What is your name?**

**Title:**

Mr

**Full Name:**

Padraig Walsh

**Q5. What is your telephone number?**

**Telephone number:**

██████████

**Q6. What is your email address?**

**Email:**

████████████████████

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

No

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

### 3. Individual

**Q8. What is your address?**

**Address Line 1:**

████

**Line 2:**

████████████████

**Line 3:**

**City:**

██████

**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::**

7.5 Community cohesion and good relations (In relation to HMOs)

**Policy (if relevant):**

SP4 Community Cohesion and Good Relations

#### 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:

P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?

#### 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 Plan is based on BMAP 2006/ 2008 which purported to deal with the problems created by HMOs , widely reported in the media in the preceding years, but which fast tracked Stranmillis to 90% Permanent HMO levels.

BMAP did Not take account of the fact that the HMO Planning legislation of 29th November 2004, effectively awarded Free HMO Planning permission to Hundreds of HMO landlords, between them owning thousands of HMO properties.

BMAP in my opinion, Deceived many people into thinking that Balanced Communities of 30% and lower would be pursued in Holylands, Stranmillis and elsewhere. And that Residents Parking Schemes and other schemes would contribute to the achievement of Balanced Communities.

Most Government Departments would be bound by the guidelines of BMAP and would have had to take account of it when considering Planning issues or Rating issues.

LPS ignored the BMAP Plan, The NIHE South Belfast Sector Study 2006, and Rates legislation of 2006 which called for "Fair" Rating Valuations. They did so at NIVT in 2011, and submitted documents ██████████ to argue that HMO levels in Sandymount had risen from 30% to 68% between 2006 and 2008, despite the 2004 legislation to Stop HMO proliferation that was already at around 90% in 2004, and BMAP which capped levels at 30%.

██████████ LPS claims to have "Project Managed" the valuations that have, in many cases large HMOs paying Lower Rates than adjacent owner occupied properties with No extensions, but with Planning restrictions placed on them on 29th November 2004, that significantly devalued them.

LPS are aggressively preventing Balanced Communities from being achieved and have gone to extraordinary lengths at NIVT to do so.

Even the then (2012) Finance Minister Sammy Wilson pursued a policy of ambivalence, ██████████ to argue that houses with Planning restrictions should pay equivalent Rates to those used as businesses, whereby many HMO landlords received multiples of around £30,000 for each HMO, and are earning tens and hundreds of thousands of pounds per annum in these lucrative business ventures which appear to be nothing less than a HMO Gravy Train, causing huge problems for Residents and Maintenance Departments in Belfast City Council.

Hansard 2012 records the then Finance Minister's ██████████ answer to a question about private home valuations vs HMO valuations, in areas of 90% HMO levels.

I have copied his comments to Belfast City Council as part of my Response. His comments, in my view, show a reckless disregard to the pledge of "Fairness" in the 2006 Rates legislation.

Another serious problem is that the NIHE HMO Public Register is actually a Secret Register, and one well known large portfolio HMO landlord (NIHE South Belfast Sector Study 2006 referred to the existence of several) is recorded as having No HMO properties recorded in the Register.

The existence of such a private Register is inimical to open and transparent Government, and may be hiding potential HMO conflicts of interest of those in several Government Departments administering or implementing HMO related matters ( Parking, Rating, Balanced Communities policy etc). Furthermore, some of those responding to this very Consultation may have HMO Conflicts of interest hidden in the Register.

Everywhere else in the UK, HMO Registers give the name and address of the owner of the HMO, and this information is freely available and downloadable from the Internet.

In 2011 NIHE proposed to charge me £19,250 to extract information from the HMO Register, along with information about HMO Grants paid out. I needed this information for an NIVT hearing.

[REDACTED] I believe their actions at that time were unethical, and constituted a form of Government bullying.

SDLP and many other parties supported BMAP in 2004 but Alasdair McDonnell publicly rejected it in 2008, even though little or nothing had been changed in the Published Plan. SDLP Refuse to explain why they did a U turn on BMAP in 2008.

The Local Development Plan seeks to build on BMAP which has Already been rejected by SDLP.

Furthermore, in March 2009 Sir Reg Empey described the post BMAP Planning Policies as "Harebrained Planning Policies", which he had strongly objected to whilst in Planning Committees.

It is, in my view reasonable to state that these "Harebrained Planning Policies" are still being pursued, and I believe this is fully illustrated in the Local Development Plan (Draft Plan).

It purports to build on BMAP, pursuing 10% - 30% Maximum HMO levels in all parts of Belfast, except for Holylands, Stranmillis etc where these policies are in urgent need of being applied.

HMO areas are most likely to occur close to Universities. Therefore this pursuance of 10% - 30% HMO levels in areas that are unlikely to have any HMOs, appears to be a Red Herring, to portray Ethical Planning practices, whilst actually pursuing policies that Sir Reg Empey described as "Harebrained Planning Policies".

Therefore for these reasons and all the reasons that I have stated in emails to LDP Committee [REDACTED] between 11th and 14th November 2018, I object to this Plan as it fails completely to tackle the problems caused by 90% HMO levels in Stranmillis, that BMAP falsely purported to make good.

**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?:**

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

No file was uploaded

**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:**

HMO section

**Policy (if relevant):**

**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:**

P1 - Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?

**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:**

There is a whole section on HMOs and Balanced Communities. But the Plan fails to promote Balanced Communities where they are actually required. Stranmillis and Holylands would be two obvious places where Balanced Communities should be promoted and supported

**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?:**

Therefore for these reasons and all the reasons that I have stated in emails to LDP Committee [REDACTED] between 11th and 14th November 2018, I object to this Plan as it fails completely to tackle the problems caused by 90% HMO levels in Stranmillis, that BMAP falsely purported to make good.

Signed

Padraig Walsh  
15th November 2018

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

No file was uploaded

**Q18b. 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

## Email received 11 Nov 2018 at 22:39

11th November 2018

Dear Sir Madam,

Please disregard the contents of the previous email. This is the amended version that I now submit.

I have just received an email notifying me of the 2018 Consultation.

I am surprised to receive this so near to the deadline.

I haven't had time to read any of it yet.

Please note that Stranmillis Residents Association were Not informed about this Consultation until a few days before the deadline, and I am most concerned about this.

I therefore request a postponement until 2 weeks after Stranmillis Residents Association next meeting on 19th November, when these issues will be discussed in detail.

Please also note that QUB and UU have attended the September and October Stranmillis Residents Association meetings, the most recent being 15th October 2018. Neither QUB or UU or the Chairperson of Stranmillis Residents Association appear to have been aware that such a Consultation was being conducted.

Given the fact that Stranmillis including Sandymount HMO Policy Area, is one of the key areas that needs urgent attention, this is most disappointing.

The last time we were consulted was 2006. BMAP Draft Plan 2006, in my opinion purposely deceived many people, including many elderly, in getting them to support a Plan that ostensibly proposed to tackle HMO problems and deliver Balanced Communities with Residents Parking etc, but which instead fast tracked Sandymount to make permanent, already existing 90 - 95% HMO levels, also fuelling an already existing HMO gravy train, whereby many HMO landlords with large Portfolios had already been given up to £30,000 or £35,000 per HMO.

It can, in my view be reasonably argued that BMAP 2006 was an elaborate piece of Deceit, that favoured HMO landlords at the expense of Owner occupiers. Sir Reg Empey, memorably attributed the HMO Planning Disaster, a result of "Harebrained Planning Policies", on St Patrick's Day 2009.

██  
██  
██

(No one in the SDLP were prepared to state why they did a U turn on BMAP from 2006 to 2008. That remains the case today also).

In relation to the New Plan, the same mistakes from 2006 must not be allowed to be repeated in 2018.

Whilst we were 'promised' Balanced Communities in 2006, NIHE, Planning, DFPNI and even NIVT have been pursuing an aggressive agenda to prevent Balanced Communities from actually being achieved.

For example in 2012 the Finance Minister at the time, Sammy Wilson answered a question at Stormont as illustrated below:

"Mr McCarthy:

I thank the Minister for his answer. What is his assessment of the increase of HMOs in some areas, particularly adjacent to Queen's University in Belfast, and the impact that has on the rateable value of non-HMO properties in those same areas?

Mr Wilson:

That issue would be better addressed by the Department for Social Development (DSD). As for the impact on established families living in those areas, I do not think that HMOs do anything to the rateable value of homes in those areas, in so far as property prices tend to go up because of demand from landlords who wish to expand. Therefore, the capital value of the houses will tend to increase. However, it does cause inconvenience. We all know, and it has been well documented, the problems it causes for residents living in those areas. However, since rates are really determined by the capital value of properties, anything that causes capital values to increase will, of course, enhance the rateable value of the houses."

I believe the above amply illustrates the levels of double speak and deception that Ministers and Government Departments have engaged in, to keep the HMO Gravy train firmly on track, at the great expense of owner occupiers, who have to daily deal with the excesses of this unbridled Greed.

Traffic Eastern have told us repeatedly that any policies they pursue are done so with close regard to Equality and Human Rights legislation. Obviously it follows that all Government Departments must do likewise.

Therefore I have copied this to both parties so that they can make a useful contribution to the Consultation, in relation to how we have been treated in the last 12 years, and the way forward until 2035.

We must not be disadvantaged and disregarded in 2018, having been deceived and ignored 12 years ago in 2006.

Sandymount HMO Policy Area is still incorrectly listed by Planning as having only 68% HMO levels.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Planning had made it clear in November 2004 that in HMO hotspots like Sandymount, No Further HMO development would be permitted.

The false statement was also completely irrelevant to the matters at hand, as I wasn't seeking HMO Planning permission, but was seeking to get Fair Rating, compliant with Balanced Community achievement, and with David Hanson's pledge of fairness in the 2006 Rates legislation.

I had also quoted very extensively from the 2006 South Belfast Sector Study in my submissions to NIVT.

But [REDACTED]

[REDACTED] the Rating Valuations, that are, in my opinion fraudulent, because in many cases owner occupiers with Properties with Planning restrictions, are paying MORE than adjacent, larger HMO properties in this area.

I have advised [REDACTED] LPS, several times, also giving several examples, but LPS Refuse to recognise the damage done to owner occupied properties in areas swamped by HMOs.

[REDACTED]

It is Not Acceptable.

Planning have also refused to publish a new document reflecting the 90% HMO levels in Sandymount HMO policy area, and 95% HMO levels elsewhere in Stranmillis.

[REDACTED] this area, that has been destroyed, in my opinion from the greed of HMO landlords. The identities and number of properties of all those who are benefitting from the HMO Gravy train, including any such persons who may be formulating or administering such policies, are concealed in a Secret 'Public NIHE HMO Register', which NIHE allowed to be created in 2005, without opposing such blatantly unethical practices.

HMO Registers All over the UK are totally transparent and also freely downloadable from the Internet.

In 2011 NIHE [REDACTED] £19,250 from me for a FOI Request, for information, mostly similar to that, which is, as stated freely available everywhere else in the UK.

[REDACTED]

This is totally unacceptable. And totally Scandalous in my view also.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

What we have, in my opinion, are several Government Departments, appearing to feed off each others [REDACTED] whilst the HMO landlords parasitically exploit the area with their huge portfolios (hidden in the above HMO Register).

Meanwhile we are subjected to exorbitant Rates [REDACTED]

And to add insult to injury we can't park our cars, because Student HMO Residents are using Sandymount HMO Policy Area as a long stay car park.

However HMO landlords and local traders (some are both HMO landlords And traders I believe) get to decide whether we will get a Residents Parking Scheme!

Again, this is unacceptable and must change.

In Conclusion.

In 2006 the HMO Draft Plan duplicitously offered the hope of Balanced Communities and Residents Parking.

12 years later, the BMAP HMO Draft Plan has been proven to be a sleight of hand by Planning, who fast tracked Sandymount to 90% Permanent HMO levels, instead of delivering Balanced Communities.

I believe All of this has to stop.



I will be replying to this Consultation hopefully in time.

But please note that neither UU or QUB or Stranmillis Residents Association have been aware of this Consultation.

And our next meeting is After the Consultation.

Therefore I request a postponement of the deadline so that Stranmillis Residents can consider in full, any implications.

I believe that owner occupiers should be heavily Compensated for the joint assault by several Government Departments to prevent Balanced Communities being achieved, in the areas worst affected.

They expect us to accept 90% HMO levels, whilst elsewhere they promote 10%, 20%, or maximum 30% levels.

It is Totally Unacceptable. It is Unethical and is Totally at variance with the ethos of Human Rights and Equality legislation.

Therefore I strongly object to the Plan, but will summarise why, when I respond to it in full.

Meanwhile, all of the above is my response to the Consultation. It must also form a part of my Response.

Please therefore consider this correspondence as an Appendix to my Consultation response which I will submit as soon as is possible.

I am grateful for your attention to these matters.

Regards

Padraig Walsh

## Email received 12 Nov 2018 at 16:56

Dear Sir, Madam,

Please note I have received an email from [REDACTED] asking me not to speak on behalf of [REDACTED].

I wish to make it clear that I did not portray that I was speaking on behalf of [REDACTED].

I copied the emails To them.

But I did request, in their interest, that we have a postponement on the deadline so that the issues can be thoroughly discussed.

If Stranmillis Residents Association reply to this Consultation, you Cannot assume that this represents the opinion of all Stranmillis Residents, unless they sign the Response.

[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

I objected to the Council about this misrepresentation about people's views in Stranmillis Residents Association and in Sandymount HMO Policy Area, and nearby Stranmillis HMO Policy Areas.

Also I would prefer that all those listed in the Committee in Belfast City Council Plan Document would openly declare that they have No HMO Conflicts of interest.

I have asked [REDACTED] and [REDACTED] NIHE to assist with this matter.

What is a HMO Conflict of interest?

If we take RHI as an example, we can state authoritatively that a HMO Conflict of interest would be present, if anyone involved in this Consultation, or a relative of theirs, is the owner of one or more HMOs. In this situation there would obviously be a HMO Conflict of interest that is unacceptable.

I have not had an opportunity to read the Plan yet, but have briefly glanced through it.

Why did Stranmillis Residents Association receive notification of the Plan with less than a weeks notice to reply to it?

What date did Belfast City Council notify QUB, UU and Stranmillis Residents Association of the Plan Consultation?

I wish to state that I am totally opposed to a Plan that promotes Balanced Communities of as low as 10% all over Belfast whilst perpetuating 90% and 95% HMO levels in Stranmillis, Sandymount HMO Policy Area, and Holylands and elsewhere.

It cannot be accepted, and should Stranmillis Residents Association not make their views crystal clear on this, then I certainly Do speak on behalf of Stranmillis Residents Association who may be afraid to speak up for their Rights.

I have copied this to QUB, UU, local representatives, NIHE, DFPNI etc as all of these entities will have to make their position crystal clear on whether they support the policy of promoting Balanced Communities everywhere in Belfast Except for the Areas that need to be helped by such policies, or whether they are going to allow Belfast City Council to perpetuate "Harebrained Planning Policies" that Sir Reg Empey so rightly described them as.

I am grateful for your attention to these matters.

Regards

Padraig Walsh

**Email received 12 Nov 2018 at 21:02**

Dear Sir, Madam,

Upon searching for the occurrence of the term HMO within the Plan there are 74 occurrences of the word.

None of them occur in section  
7.3 'Residential Design' - on first inspection.

This is not that surprising. Because HMO hotspots cannot possibly be regarded as proper Residential areas. But that does not mean that we can be completely ignored. In fact the opposite should be the case. That's where the focus actually Should be.

The Plan appears to Not recognise Stranmillis as a Residential area. And this is worrying.

[REDACTED]

Yes, Stranmillis is Not a proper Residential area. It is a former Residential area which has been destroyed by Planning and NIHE, and transformed into a HMO letting area, that has been imposed upon a handful of remaining Residents.

Therefore The Plan fails completely to deal with HMO areas in relation to Section 7.3. "Shaping a liveable Space"

An UnBalanced Community with 90% - 95% HMO levels when levels should be 30% maximum, is NOT a "Liveable Space".

The Residents Human Rights to live in a Residential area, a "Liveable Space", a "Balanced Community" has been taken away from them. And in my view in an unethical manner, possibly by some with HMO conflicts of interest, that [REDACTED] and [REDACTED] are now hopefully investigating.

BMAP 2006 and 2008 falsely promised the hope of Balanced Communities to fix the problem. But instead imposed a HMO Letting Area upon this 'Residential' area, whilst denying us the rights to live in a normal Residential area, that the Plan seeks to promote in all other parts of Belfast.

I believe the Deception of BMAP was deliberately done in the full knowledge that those that BMAP wanted to deceive were mostly elderly and also Female. I stated this to Planning at the time.

I note that most, if not all those listed in the Plan Committee are all Male Councillors. And it is very likely, in my view, that the majority of HMO landlords are Male.

I believe that the reckless HMO policies being currently pursued, may be by a largely male dominated group of people who may believe that females may be less likely to stick up for themselves. And this is of concern. As is the age issue also.

Therefore I need to make Equality Commission and Human Rights aware of this possible Discrimination that seeks to impose unacceptable living conditions upon a largely female dominated

Residential population, who also appear to be traumatised so much by the effects of HMOs that the very word HMO is actually Banned at Stranmillis Residents Association meetings.

Therefore I object to the Plan, in openly and blatantly excluding HMO areas as Residential areas worthy of consideration.

Planning and NIHE created these areas. And whilst some may think of these areas as Residential, they cannot possibly be regarded as properly Residential, until Belfast City Council start to aggressively promote Balanced Communities, and "Liveable Spaces".

To take just one example from the Plan

"7.3.8 Adequate quality private open space is required within residential development to provide recreational and social value. Private open space is also vital to the overall design quality of the development and can help promote biodiversity. Well-designed space around buildings can add greatly to the attractiveness of a development especially where principles of defensible open space are applied."

Why is there nothing in the Plan that seeks to address the Residential areas that are primarily HMO Letting areas in nature?

Why do the above principles or aspirations apply only to Non HMO areas, or Balanced Communities?

I see repeated references to BMAP in the 2018 Plan. But there appears to be No mention of [REDACTED] rejection of the Plan in 2008, or Sir Reg Empey's description of BMAP as "Harebrained Planning Policies".

Therefore the 2018 Plan seeks also to portray that the 2008 HMO Plan was somehow acceptable, even when it so clearly deceived so many, with the hope of Balanced Communities. That's why they supported it. And this must not be overlooked.

There are so many issues in the Plan that need to be considered, and due to the short notice given, I believe that Stranmillis Residents Association should be given the time to see the extent to which our area has been neglected in The Plan, and to decide whether they think it is acceptable.

But from what I have seen of the Plan so far, I reject it entirely on the basis that it seeks to take advantage of the Deception of BMAP, and to build upon it, by totally ignoring the problems caused by HMOs, and therefore propping up the HMO Gravy train, whilst promoting Balanced Communities in all other parts of Belfast, much of which would not be HMO in character in any event, as HMOs occur predominantly close to Universities.

Therefore I believe the Plan is a further attempt to neglect to deal with the issues, and therefore perpetuate the HMO Gravy train, that has caused so much damage to Stranmillis and other HMO areas.

I am grateful for your attention to these matters.

Regards

Padraig Walsh

## Email received 12 Nov 2018 at 22:17

Dear Sirs,

(Apologies for not realising that there are no females in the Belfast City Council 2018 Plan Committee)

In relation to

7.5 Community cohesion and good relations

There is No mention of HMOs or indeed Balanced Communities.

I would therefore re-voice my concern that the concept of Balanced Communities was a BMAP sleight of hand, Red Herring.., to persuade people in HMO areas to let Planning off scot free with their 'Harebrained Planning Policies', that Sir Reg Empey had voiced so much concern about, whilst in the Planning Committee.

This trick worked for BMAP, as many people fell for the Deception, and Planning continued with these "Harebrained Planning Policies" for another 12 years.

The current 2018 Plan appears to be using this Psychology again, by promoting Balanced Communities in areas that don't even need such policies applied, because they are not HMO rental areas.

The term Balanced Communities applies ONLY to areas that Planning and NIHE have allowed to rise to 90%+ HMO Levels, that Planning now concede should only have been allowed to get to 30% maximum.

Therefore I believe there appears to be significant amounts of Deception in the 2018 Plan, seeking to portray that Belfast City Council is pursuing ethical HMO policies, when the reality is that they are continuing to promote completely Unethical HMO policies, that favour HMO landlords and that continues to prop up the HMO Gravy train, that causes massive problems for Residents in areas of 90% HMO, whilst large Portfolio HMO landlords are in some cases earning hundreds of thousands of pounds per year, at our expense.

How can this possibly promote "Community cohesion and good relations"???

We need Belfast City Council to stop skirting round the issues and to start tackling the problems that HMOs are continuing to cause, and to start immediately to promote Balanced Communities.

DFPNI fair Rating is the first of many steps needed.

Also, I haven't noticed whether The Plan supports, or is concerned about the secrecy of the HMO Public Register, that allows those in Public positions to influence and implement HMO policies without declaring such Conflicts of interest.

I would therefore ask that Belfast City Council Plan Consultation Committee members make clear where they stand on the secrecy of the HMO Public Register.

Does Belfast City Council support Openness and Transparency and Fairness in relation to HMO related matters directly affecting HMO Policy Areas like Sandymount, Stranmillis, Holylands etc?

What does Belfast City Council propose to do about the Unethical Secrecy of the HMO Public Register, that facilitates these potential Conflicts of interest, by those who are implementing policy, whilst possibly benefitting from those policies, at the expense of those living in the areas exploited by HMOs?

I am grateful for your attention to these matters.

Regards

Padraig Walsh

**Email received 13 Nov 2018 at 16:31**

Dear [REDACTED]

Thank you for your reply.

I wish to inform you that [REDACTED], along with QUB and UU have all attended Stranmillis Residents Association meetings in September and October 2018, after having been notified of this extremely important Plan.

[REDACTED] the term HMO is Not allowed to be used at Stranmillis Residents Association meetings.

Even though ALL of the issues we discuss at Every meeting are HMO related.

I believe it is a measure of how Stranmillis Residents have been traumatised by the effects of HMOs, but most are in denial of the cause of All these problems.

[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] NIHE and [REDACTED] LPS would be in a position to inform LDP about the catastrophic effect their policies have had on those who have been directly and adversely affected by BMAP, and the legislation of 29th November 2004, that delivered Free HMO Planning permission to Hundreds of HMO landlords, jointly owning thousands of HMO properties.

It's all very disturbing.

BMAP 2006 falsely 'promised' Balanced Communities, but instead it delivered Divided Communities.

In relation to LDP

7.5 Community cohesion and good relations.

It is laid bare, the damage that BMAP has already done to Stranmillis. The fact that LDP is not aware of the aggravation and Division caused by BMAP over the years, is also worrisome.

People are afraid to state that the problems are HMO related, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Therefore I repeat.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I have not had time to write an overall Consultation response. And I am aware of a few grammatical or spelling mistakes in previous emails, that may slightly alter the meaning, but hopefully not.

Do I have to submit a Consultation Statement covering all the points in the previous emails, by 5pm Thursday 15th November?

You will appreciate that I had less than a week to consider these issues, and formulate a concise response covering the main points.

I had given background information about NIHE, NIVT, LPS etc so that Belfast City Council could fully understand why Transparency, Accountability and most importantly Fairness, are vital, in moving forward and towards Balanced Community achievement, and Compensation for the damage done, and stress caused by the above Government Departments over the last 12 years.

I am grateful for your attention to these matters.

Regards

Padraig Walsh

**Email received 14 Nov 2018 at 00:35**

Dear [REDACTED]

I wish to make it clear that the HMO Gravy Train I refer to is a reference to those Large Portfolio HMO landlords who received multiples of up to £30k- £35k in Grants, and continue to operate large HMO businesses, bringing in tens of thousands and in some cases hundreds of thousands of pounds, per annum, contributing to severe overcrowding issues, and Parking problems, and huge overheads in the area with Cleansing Dept, Noise Control etc, whilst being charged Domestic Rates, in many instances paying lower Rates than neighbouring Devalued Owner Occupied properties with Planning Restrictions.

DFPNI LPS have repeatedly refused to apply a fair system,. Presently the Few are subsidising the HMO exploits of the many, in relation to Rating, whilst living in these devalued properties, and having to live in these Severely UnBalanced Communities.

NIHE have repeatedly refused to disclose the amounts of Grant money paid to the large Portfolio landlords, who continue to exploit these areas.

And [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] This is a completely untenable situation.

Addressing these problems must be central to the Plan, so that HMO landlords can have better relations with the small Community in the areas that they make their money, and Student HMO Residents can live in a situation that is being Managed, whilst Balanced Community Policies are aggressively applied so that some semblance of normality can return to these areas.

I believe also that a Compensation scheme should be introduced for those who have complained about these issues. But not for those who have constantly pandered to those who have created the problems.

I am grateful for your attention to these matters.

Regards

Padraig Walsh