

Submitted to **Belfast LDP 2035 - Plan Strategy**  
Submitted on **2018-11-15 15:32:37**

## 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:**

Ms

**Full Name:**

Áine Groogan

**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:**

37 Bass Buildings

**Line 2:**

38 Alfred Street

**Line 3:**

**City:**

Belfast

**Postcode:**

BT28EP

### 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::

N/A

Policy (if relevant):

### 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:

Belfast City Council's Statement of Community Involvement section 2.5 states that they "are committed to ensuring that all council engagement is meaningful, inclusive and fit [sic]". Section 2.5 (ii) also makes specific reference to ensuring that all sections of the community are "enabled and empowered to participate".

Despite this, there have been a number of aspects of this current consultation phase on the draft Plan Strategy that have shown limitations as to how meaningful and inclusive it has been.

The draft Plan Strategy document is a weighty text in and of itself that would present a considerable challenge to many in the community to engage with in a meaningful way. On top of this, the soundness test was a new concept that even those who are used to being involved in consultations were unfamiliar with. Some community groups have stated that this basis for the consultation has precluded them from being able to respond to the draft Plan Strategy as it has been framed in a narrow and exclusionary way. Whilst the tests for soundness do present an opportunity for communities to consult on the draft Plan Strategy, the accompanying guidance to enable and empower them to do so is lacking.

For example (e.g.), Belfast City Council created an animated video for this consultation phase that helped explain the soundness test and how the community could get involved. This was used online and at the engagement events. Whilst this video assisted in making the consultation more understandable to some, one serious drawback of it was that there was no accompanying audio for the information. This was a serious limit on the ability of those who have a visual impairment to understand and get involved with the consultation. Not only did this conflict with the SCI, it also raises concerns about its compliance with Section 75 of the Northern Ireland Act 1998.

As well as this, whilst the SCI states that alternative formats of the consultation material would be available and this was confirmed by staff when the accessibility of the material was questioned at an engagement event that a party representative attended, they were not easily obtained (e.g. no alternative downloads on website) or indeed mentions of their availability were few and far between (e.g. there was no mention of this within the draft Plan Strategy document itself, the summary document, on the LDP info page on the Council website, in the City Matters publication etc.).

The Questionnaire format is set out so that those responding in this way either have to state they believe the draft Plan Strategy to be sound or unsound. There is no opportunity to highlight elements that an individual or community group believe to be unsound whilst also allowing them to comment on aspects that they support and believe to be sound. The need for an absolutist approach to soundness in this format restricts the ability for people to engage with this consultation- they either don't engage at all as cannot take such a position or they have to put forward a one-sided position. I recognise that a wider consultation took place for the LDP Preferred Options Paper and the Belfast Agenda, however I also note that this is the first opportunity to consult on the LDP following the finalisation of the Belfast Agenda in Autumn 2017.

As a whole, this meant that the draft Plan Strategy and the consultation process were not user-friendly or inclusive as the Statement of Community Involvement states that it should be.

### 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?:

A new consultation period where all information provided is accessible to all in the community. Greater work should be put into providing more explanatory documents to help individuals and community organisations to engage meaningfully with the draft Plan Strategy based on the soundness test- a short video and DfI document that sets out the soundness categories was not sufficient to what this meant in practice.

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:**

7.1.61-7.1.70

**Policy (if relevant):**

HOU10 Housing Management Areas

**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:**

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

**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:**

Whilst I am fully supportive of the need to rebalance communities in Housing Management Areas (HMAs), the policy as outlined in HOU10 seems to be contradictory to the objective behind this policy. It states that planning permission would only be granted for HMOs and/or flats where they wouldn't cause the total number of HMOs/flats to exceed 20% in that area, whereas the acceptable level outside these HMAs are 10%. In order to ensure that planning policy supports the rebalancing of communities with HMAs, the acceptable level to approve any further HMOs/flats should be the same as non-HMA areas. Although density levels in HMAs are currently well above 20% in many instances, unless the target is to reduce it to 'normal' levels, i.e. less than 10%, then the planning policy will continue to enable over-development.

**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?:**

The limit for which HMOs and/or flats should not be approved over in HMAs should be 10%, as it is outside of HMAs.

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?**

Yes

## **8b. Unsound - Third Submission**

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

**Relevant Section or Paragraph::**

8.1.13-8.1.20

**Policy (if relevant):**

EC2 Employment Land Supply

**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:**

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

**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:**

This policy states that 550,000sq.m of employment space should be provided between 2020-2035 to support the city's growth strategy. Section 8.1.18, however, states that there is currently a significant over-supply of employment space in Belfast. As such, the LDP draft Plan Strategy should set out how this surplus land should be best utilised, e.g. for residential use, but this section does not make this clear as it focuses on the need to provide employment land rather than the

need to rezone existing employment land. This is a potentially incoherency that needs to be addressed. It is noted, however, that this might be dealt with in the next stage of the LDP process, in the local policies plan.

**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?:**

The LDP draft Plan Strategy should set out how this surplus land should be best utilised, e.g. for residential use. It is noted, however, that this might be dealt with in the next stage of the LDP process, in the local policies plan.

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

No file was uploaded

**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::**

8.4.10-8.4.14

**Policy (if relevant):**

TLC3 Overnight Visitor Accommodation

**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:**

CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**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:**

TLC3 states that “[p]lanning permission will be granted for development proposals for new overnight visitor accommodation within the city centre boundary.” The justification for this is to encourage visitors to stay in Belfast. This policy is not necessarily reflective of the need for additional overnight visitor accommodation, however, and so should include conditions to demonstrate need within each specific proposal to ensure that this is compliant with sustainable development. We have already seen a proliferation of hotel accommodation in the last few years and the Northern Ireland Hotels Federation’s analysis suggests that supply is outstripping demand to such an extent that it might not level out until 2022. On this basis, this policy as it currently stands does not pass the test of being “realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base”.

Source of info- <https://www.bbc.com/news/uk-northern-ireland-45889436>.

**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?:**

Additional safeguards are required within this policy so that future provision of overnight visitor accommodation is done so in a sustainable manner- such as planning permission is dependant on demonstrating the need for each proposal.

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

No file was uploaded

**Q18d. 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