

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

Submitted on **2018-11-14 17:48:56**

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:

Organisation

Q4. What is your name?

Title:

MS

Full Name:

Geraldine McAteer

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?

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:

West Belfast Partnership Board

Your Job Title:

CEO

Address Line 1:

218-226 falls Road

Line 2:

Line 3:

City:

Belfast

Postcode:

BT11 8AF

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 sound

8a. Sound

Q13. If you consider the Plan Strategy to be sound and wish to support the Plan Strategy, please set out your comments below:

Reasons for support:

Submission from West Belfast Partnership Board

West Belfast Partnership Board welcomes the opportunity to respond to the Belfast Local Development Plan –draft Plan Strategy. We acknowledge that the Belfast City Council LDP team have prepared the LDP –draft plan strategy taking into account the Belfast Agenda, the range of current planning policies, the current policies of adjacent Councils and other informatives such as Transport and environmental policies.

The LDP draft Plan strategy sets out bold ambitions for Belfast 2035 that reflect the Belfast Agenda and presents innovative proposals for achieving these in spatial terms. There is a great deal in this report that WBPB welcome, though for purposes of brevity, we wish to reference those which relate to our local priorities:

1.1.8 The council is fully committed to engaging with local communities and stakeholders to encourage inclusive discussions on the LDP draft Plan Strategy key planning.

We would acknowledge that the LDP team have carried out a large number of public meetings in relation to the draft LDP Plan and we also acknowledge the willingness of the team to attend every meeting we invited them to. Best endeavours were used to explain the myriad of policies contained in the draft LDP and we welcome the time and professionalism involved by the team.

We would however, wish to make the point that a small technical assistance budget to WBPB would have assisted us with a more thorough and professional response to the consultation on the draft Plan Strategy. Like many community organisations, we operate with a very small staff and budget and do not have access to expertise. We would therefore be concerned that the west Belfast area in general may not be equipped to comment on policies which will become the future planning policies for the city and which may not always serve the interests of this neighbourhood. This is in contrast to other organisations and business interests who have access to consultants etc.

2.2 Economic

Belfast has witnessed a revival in recent years in terms of inward investment, including significant regeneration within the Titanic Quarter and waterfront areas, major growth in tourism and the Ulster University redevelopment in the city centre. There are opportunities to support and promote the continued regeneration of the city centre to attract inward investment

Whilst this is an accurate description, the draft Plan Strategy does not include similar positive references to neighbourhoods such as west Belfast which have also experienced significant regeneration , e.g., Andor at Springvale business Park, the Glider, tourism in west Belfast or the Connswater Greenway developments in east. It might give the impression that working class areas are not ripe for investment, which would be expected in an increasingly thriving city of the future with a commitment to inclusive growth.

3.4.3 We welcome this paragraph which includes intensive plans for five special action areas including Inner north/ west.

SD3 - City centre

The council will support new economic and residential development to create a compact and vibrant city centre. New development will be directed towards development opportunities located within the following broad areas:

- City Core;
- Innovation District;
- Mercantile District; and
- Waterfront District.

Whilst WBPB are supportive of the growth and development of the city centre core, we are concerned that in future years, planning policies will dictate that businesses and inward investment are permitted only in designated city centre areas and not in neighbourhood locations. West Belfast contains a number of business parks which have operated successfully and also those which still have capacity for further investment. We acknowledge that these are listed in the LDP but have concerns that planning policies linked to the LDP may out off further investment.

7.1 Housing

Introduction

7.1.1 Belfast has ambitious growth plans that will necessitate new housing provision. ...

'the LDP process is the main vehicle for assessing future housing land requirements and managing housing growth'

7.1.3 There is significant demand for affordable forms of housing in the city. Although

house prices are relatively low in Belfast by national standards, incomes are comparatively lower. Average rents are relatively high compared to other areas of NI and an acceleration in the rate of growth in house prices, increases in interest rates and inflation could lead to worsening affordability issues over the plan period. Therefore, housing provision will need to ensure a strong supply of affordable accommodation in the right locations.the LDP can identify suitable land, helping to rectify the supply shortage.

The shortage of housing in west Belfast has been a major challenge to local people for decades. House prices in west Belfast are high due to lack of supply. Many young families have had to move out of west Belfast to other Council areas as they could not afford local west Belfast prices. This is challenging for them as family ties and supports become disconnected.

The demand for social housing in west Belfast is notoriously high, as not enough land is being made available for housing. Currently there are approx.. 2, 300 on the waiting list, with very little hope of getting a house. Rents in the private sector are high and people have no security of tenure. Para 7.15 is therefore very welcome.

Policy HOU5 – Affordable housing

Planning permission will be granted for residential development on sites greater than 0.1 hectares and/or containing 5 or more dwelling units where a minimum of 20% of units are provided as affordable housing.

Affordable housing should consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, regard will be had to an up to date analysis of demand, including housing stress and prevailing housing need.

The affordable housing should be provided as an integral part of mixed tenure development, integrated with general needs housing and not readily distinguishable in terms of external design, materials and finishes.

WBPB welcome this significant initiative which is aimed at ensuring that every housing development with over 5 housing units has a 20% requirement to provide affordable housing. Further, we welcome the affordable housing definition as included in Policy HOU5 and the "blind " tenure approach. WBPB would hope that this approach will be an effective tool in addressing the housing shortage in west Belfast and also deliver socially inclusion.

7.1.41 The mixture of different types and sizes of houses, apartments and maisonettes

required through this policy will therefore help to provide choice within a housing development and assist in the creation of a balanced community in the local area.

Mixed communities will also help provide a greater housing choice, benefit health and wellbeing, reduce social exclusion and help tackle area based deprivation.

WBPB agree with both statements above. However, we would stress that it is vital to in the first instance address housing need. In many communities, people have been on waiting lists and in hostels for years and we would assert that the housing crisis needs to be addressed.

WBPB agree with the above objective but would refute that sectarianism only exists in disadvantaged areas in city neighbourhoods. Sectarianism and segregation also extends to the middle classes in Belfast. WBPB accept wholeheartedly that sectarianism needs to be tackled and we welcome the commitment to that, but it exists further afield in the city.

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:

Oral hearing