

Our Ref:
Your Ref:



Ards and
North Down
Borough Council

Belfast Planning Service
Belfast City Council
Ground Floor
Cecil Ward Building
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Belfast
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Planning Department



Dear Sirs

Ref: Local Development Plan Draft Plan Strategy

Thank you for the opportunity to comment on the Council's recent publication of its Draft Plan Strategy.

Please find attached the response from Ards and North Down Borough Council.

Yours sincerely



9/11/18.



Response to Belfast City Council's draft Plan Strategy Consultation

Ards and North Down Borough Council considers the draft Plan Strategy to be UNSOUND.

The relevant sections of the draft strategy are noted and the tests of soundness to which the representation relates are marked in bold for each. As requested by the template, each matter is addressed on a separate page.

Policy SP1 - Growth Strategy (paragraph 5.1-5.1.4 , page 34-35)

- C1 Did the council take account of the Regional Development Strategy?
- 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; and
- CE4 It is reasonably flexible to enable it to deal with changing circumstances.

The draft Plan Strategy does not identify the detail on where the population is likely to come from. Scenarios shown in Turley's report for Belfast City Council acknowledges the need for a significant uplift to recent level of housing delivery in Belfast.

Page 3 of Turley's¹ report states that some caution should be applied. Page 23 of the Turley's report refers to the land supply and build rates of which remaining potential would be 50 years using the latest build rates. Page 26 of Technical Supplement 2: Housing, shows the need for exponential style growth in terms of projecting house build rates to meet the growth targets set out.

While Ards and North Down Borough Council supports employment growth, it is unclear how the figure is treated and whether it is to primarily be treated as a success scenario figure.

It is not clear from cross-reference to the evidence in the technical supplements or the Sustainability Appraisal about the implications to other settlements such as those within the neighbouring Ards and North Down Borough Council area and potential for

¹ Housing Growth Options Report, Belfast City Population and Housing Growth Study. Turley October 2016.

negative implications with growth. Neighbouring councils' plans or strategies do not appear to have been clearly cross-referenced in development and is considered to be incompatible with higher level regional planning aims and objectives.

Whilst Ards and North Down Borough Council is still in process of developing its LDP, this envisaged level of growth is certain to have potentially profound knock-on effects on how this neighbouring council's treatment of the HGI allocation is considered and potential implications and effects on realising objectives for growth within our area.

Overall it is not clear how the growth aspiration is realistic or sustainable. The implications on cross-boundary neighbouring councils are not considered to have been dealt with adequately.

Policy HOU 1 Accommodating new homes (page 60-62)

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It is considered that this policy fails to meet the consistency, coherence and effectiveness soundness tests.

The draft Plan Strategy sets out growth which is at a distinct variance from Department for Infrastructure (DFI) Housing Growth Figures (HGI).

Supplementary technical note 2 – housing indicates that *'As noted in the POP consultation report, there are also cross boundary implications arising from the effective housing market area, which will be addressed through liaison with NIHE and neighbouring authorities'*.

The Belfast Housing Market Area (HMA) is indicated as operating as a single area. The issue of growth in Belfast City Council area itself will have implications beyond to others areas in the HMA. While the technical supplement refers to implications these are not addressed adequately in the draft Plan Strategy.

In cross-reference to the Sustainability Appraisal it is unclear with regard to the likely implications for infrastructure provision (not limited to waste, water and education) and growth of neighbouring councils.

Policy HOU2 – Windfall Housing (page 63-64)

- C1** Did the council take account of the Regional Development Strategy?
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-
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 - 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; and**
 - CE4** It is reasonably flexible to enable it to deal with changing circumstances.

Windfall appears low when examined in context of Urban Capacity Study. Policy to allow on sites within the urban footprint that are not zoned for housing or mixed use could increase this figure significantly. It is considered irrational to state that windfall can be carefully managed.

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CE3 There are clear mechanisms for implementation and monitoring; and

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

With reference to paragraph 8.1.15 – it appears irrational to completely exclude reference to existing stock. It is also unclear from the evidence base where existing stock has been taken account of. It is unclear how the Plan Strategy reflects consideration of employment land as set out in the RDS.

SP1 and 9.4 Transportation

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The progress of Belfast City Council Draft Plan strategy is in advance of publication of a draft Transport Strategy. The implications for growth of Belfast City Council along with other neighbouring councils are not fully set out in absence of a Transport Strategy.

Proposals for transportation may have likely significant effects upon the sustainability objectives. This Council notes that DfI had expressed caution in proceeding in advance of the Transportation Strategy. An up to date Transport Strategy would give a mechanism to consideration of housing and employment growth not limited to Belfast City Council area. How does the draft Plan Strategy deal with this?

Belfast City Council Technical note 14 states: *'The draft Plan Strategy has been developed in the absence of an up to date transport plan for the city, however it makes reference to the Department's extant transport plan (BMTP) within the transport policy section. For example, the draft Plan Strategy contains a policy to safeguard land required to implement new transport proposals or planned improvements to the transportation network as identified in the DfI's extant plan. A number of existing designations and policies for transport contained in the draft BMAP will be retained and will continue to form the basis of decision making until the LDP is adopted in its entirety.*

A coordinated approach is required between DfI, the Council and neighbouring authorities across the sub-region to deliver the transportation vision for the city. There is also a duty to cooperate with neighbouring planning authorities to maximise the effectiveness of policies for strategic matters including transport which is being facilitated by the LDP Metropolitan Area Working Group.

A Transport Plan Programme Board has been set up by DfI to oversee the preparation of the new set of Transport Plans. It is proposed that the Transport plans will be developed in a two stage approach similar to the LDP comprising a strategy document followed by a more detailed plan'.

The overall growth strategy proposed in the draft Plan Strategy and progression to consultation on the LDP document in advance of the Transport Strategy appears at odds with ability to match the comment in the technical note with regard to *'...maximising effectiveness of policies for strategic matters and advice by central government'*.

SP 8 Green and Blue Infrastructure Network (page 42-44)

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Ards and North Down Borough Council is supportive in respect of the intention to develop a green and blue infrastructure network. As a neighbouring council with linkages on the draft network identified within the draft Plan Strategy (page 43), it is disappointing that meaningful engagement has not taken place with regard to the Strategy Policy set out in the draft Plan Strategy.

Sustainability Appraisal incorporating Strategic Environmental Assessment

The exponential growth identified in Belfast Plan Strategy has obvious fundamental implications for infrastructure.

The SA incorporating SEA states (at 3.8.4) that:

Limitations were also encountered when accessing data in relation to infrastructure constraints. For example, the lack of data on the capacity of waste water treatment infrastructure means that it is not possible to fully assess the implications of the preferred growth scenario, particularly in relation to soil quality or water quality.

This is of concern in the context of the draft Plan Strategy in significant departure from HGI and the lack of detail regarding Ards and North Down being a neighbouring council of which one WWTW is located at Kinnegar which takes output from Belfast City Council. The draft Plan strategy is silent on this aspect.

SA 16 of the Sustainability Appraisal notes:

'However, there are capacity issues with the existing Waste Water Treatment (WWT) facilities in Belfast, which could prove to be a risk in the short term, and subsequently both uncertain and mixed effects are noted for this reason. Likewise whilst development could be facilitated within the existing urban footprint, the locations of interface areas are fixed and there may be infrastructure implications, so mixed effects are again identified'.

There is no comment apart from the reference to 'could prove to be a risk in the short term', no implications for medium or long term are set out when cumulatively assessed with new development in Ards and North Down as a neighbouring council.

The SA also states that *'Economic effects are therefore also likely to be mixed, in particular as an increase in economic development will produce more waste water, which could potentially exceed the existing WWT capacity if it is not managed efficiently throughout the plan period'.*

Technical supplement 15 (paragraph 4.4) notes that 'There is concern that infrastructure would not keep pace with the proposed growth and is currently under strain'.

In the mitigation section of Belfast City Council SA–

'Effective infrastructure investment management in line with development is required to offset the medium to long term waste water treatment capacity issues. This is supported by LDP draft strategic policy SP1 Growth through co-ordinated site releases to mitigate impact during the plan period. The mitigation and enhancement benefits could be obtained in the medium to long term period, subject to DfI plans for upgrading the infrastructure required for growth'

This comment appears to be dependent on central government plans for upgrading the infrastructure required for growth. The comment may sit at odds with expected growth or that which DFI sees fit; given published HGI figures by DFI are completely at variance. The Council would also question the ability to improve infrastructure of the scale required to meet the growth strategy of the plan. It is unclear how Belfast

City Council could match the mitigation set out in the SA with unknown plans by the infrastructure provider and thus cannot soundly support the Plan Strategy.

It is unclear how the draft Plan Strategy can be supported by infrastructure and services which are outside the ambit of Belfast City Council. Are the growth plans deliverable in context of budget constraints? Does the nature of Section 76 agreements allow for a strategic resourcing approach of infrastructure which may have implications to neighbouring councils?

It is not clear where full consideration has been given to neighbouring councils on boundary issues.

The SA itself, while referencing neighbouring councils, does not make any comments with regard to environmental implications of the draft PS in relation to the neighbouring councils.

(The SA at appendix 4 refers to 'North Down and Ards' LDP; this should read 'Ards and North Down' to reflect the correct name of the neighbouring council).

While no explicit 'duty to co-operate' exists, the forum for cross-council working would have provided the opportunity for Belfast City Council to explore wider implications.

Baseline data does not appropriately support the strategy and mitigation is considered as being incomplete.