

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

Submitted on **2018-11-07 15:04:36**

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:

[REDACTED]

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::

5. Agents

Q10. Please provide details of the organisation or individual you are representing:

The name of the organisation or individual you are representing::

[REDACTED]

Title:

[REDACTED]

First Name:

[REDACTED]

Last Name:

[REDACTED]

Address Line 1:

[REDACTED]

Line 2:

Line 3:

City:

Postcode:

Telephone number:

Email address:

Q11. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

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::

Policy (if relevant):

EC4 Loss of zoned employment Land

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:

P4 - Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?, 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?, 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, 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:

EC4 is contrary to RDS Table 3.1 Stage 1; SPSS para. 6.89; PPS4 paras. 4.19-4.21; DP Practice Note 7 paras. 3.1, 5.3, 5.4, 5.8, 6.1-6.3; Belfast Agenda Stretch Goals 8 & 9.

Policy EC4 retains the existing employment lands from BMAP without any evaluation of their suitability as employment lands or a consideration of any alternative uses or zonings based on regeneration especially the old industrial lands in the Inner City (outer limit undefined as yet but reasonably easy to approximate). BMAP zoned these Inner City lands for the first time as they were unzoned in the BUAP. I can find nowhere in BMAP documentation where these lands were evaluated for zoning. EC4 is condemning these old underused, vacant, redundant Inner City industrial sites to further stagnation. The tests for developing them for non-industrial uses are onerous, requiring a protracted time of non-use and proofs which will make the development control process tortuous and off-putting for potential developers. The Plan should be encouraging fresh alternative regenerative uses in these areas of multiple deprivation and often on interfaces. Given that the Plan has policies encouraging this, EC4 renders the plan incoherent and inflexible in this regard.

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?:

Amend EC4 to state that, where appropriate, Inner City zoned employment land or buildings can be considered for mixed uses (non-economic as well as economic).

BMAP was altered at the recommendation of the PAC in the "BMA Employment Strategy" to incorporate "Mixed use and regeneration sites close to major areas of disadvantage and social need and/or in support of economic or community regeneration".

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?

No

9. Type of Procedure

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

Oral hearing