

Submitted to **Belfast LDP 2035: draft Plan Strategy Sustainability Appraisal**  
Submitted on **2018-11-15 15:51:22**

## 1. Data Protection

1 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.

2 Do you consent for us to publish your response?

Yes, please publish my response with my name

## 2. Your details

3 Are you responding as an individual or on behalf of a group or organisation?

Individual, Organisation or Agent:

Individual

4 What is your name?

Title:

Professor

Full name:

Austin Smyth

5 What is your telephone number?

Telephone number:

6 What is your email address?

Email:

[REDACTED]

## 3. Individual

7 What is your address?

Address Line 1:

University of Hertfordshire

Address Line 2:

Address Line 3:

City:

Hatfield

Postcode:

AL10 9AB

6. Before you submit your comments

## 7. Plan, Policies and Programmes Review

11 Are there other relevant policies, plans and programmes that will affect or influence the Local Development Plan/Sustainability Appraisal, which have not been included in the list?

Yes

If 'Yes' please provide details here:

## 8. Baseline Information

**12 Do you think that the baseline data collected is appropriate i.e. at the right level and sufficient coverage with nothing missing?**

No

**If 'No', please provide details here:**

The data presented is in the main piecemeal, partial superficial with the documentation relying largely on secondary sources not designed for the purpose of setting out a Local Development Plan Strategy

**13 Have we got the Sustainability Issues right?**

Yes

**If 'No', please provide details::**

**14 Are there any other Sustainability Issues that should be included?**

Yes

**If 'Yes', please provide details::**

The list of issues involves overlap and partial duplication . UK national guidance on this matter offer a much more coherent framework within which to locate the issues of relevance

## **9. Sustainability Objectives**

**15 Have we got the Sustainability Objectives correct?**

No

**If 'No', please provide details::**

See previous comment

**16 Are there any other objectives that should be included (bearing in mind the need to keep the number of objectives manageable?)**

Yes

**If 'Yes', please provide details::**

See previous comment

**17 Should any objectives be re-worded or removed?**

Yes

**If 'Yes', please provide details::**

See previous comment

## **10. Reasonable Alternatives**

**18 Are there any alternatives that, in your opinion, are not viable?**

Yes

**If 'Yes', please provide details::**

This would require a thorough restructuring of the document and for it to be based on a comprehensive bespoke evidence base on which robust conclusions can be drawn.

**19 Are there any viable alternatives that may have been missed?**

Yes

**If 'Yes', please provide details::**

See previous comment at 18

**20 Are the mitigation measures identified appropriate?**

Yes

**If 'No', please provide details::**

See comment at 18 that would inform specification of appropriate mitigation measures.

## **11. Monitoring**

**21 Are the monitoring arrangements and indicators correct?**

No

**If 'No', please provide details::**

See above at 18 -20

**22 Is there any information not present in the Sustainability Appraisal that, in your opinion, would be beneficial to monitor and could be monitored?**

Yes

**If 'Yes', please provide details::**

The overall strategy should incorporate robust quantitative monitoring indicators where feasible and informed by in-depth evidence and robust analysis.

**12. Conclusion**

**23 Do you have any other comments on the SA Report?**

**Please enter any comments::**

The SA covers much of relevance. However, it does so in the main at a strategic level without an adequate and robust evidence base and an appropriate level of analysis.