

Belfast City Council – Draft Plan Strategy
Representation on behalf of George Best
Belfast City Airport

November 2018

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Contact

Sheila Murphy



12 Nov 2018

1. Introduction

- 1.1 This submission has been prepared by Turley, on behalf of George Best Belfast City Airport (GBBCA) in response to the publication of, and formal consultation on, Belfast City Council's ('the Council') Draft Plan Strategy ('DPS').
- 1.2 GBBCA welcome the publication of the Draft Plan Strategy and the progress that the Council is making towards adopting a local development plan for Belfast.
- 1.3 This submission follows a lineage of responses by our client to city planning consultations which have sought to clearly identify the role of the airport for Belfast and the wider Northern Ireland Region. Recognising the vital contribution of the airport to the city should be a fundamental pillar of the emerging Plan Strategy.
- 1.4 The purpose of this submission is to provide the clear evidence base required to show that the DPS, in its current form, is 'unsound'.
- 1.5 Additionally, we provide commentary and recommendations on how the plan would be more 'sound', if amended in line with this submission. Indeed, the authors of this submission have a combined total of 20 years of experience providing professional planning services in Belfast City and Northern Ireland.
- 1.6 To ensure that this representation is based on a robust evidence base, we have reviewed all legislative, regulative and policy requirements/guidance associated with local development plans in Northern Ireland and all supporting documents associated with the DPS and the preferred Options Paper, which are relevant to the topics/policies which we make comment on.
- 1.7 Commentary is not provided on every aspect of the DPS, but is reserved only for those elements of the DPS that are of relevance to our client.

2. Legislative Context

- 2.1 Sections 6 (1) and (2) of the Planning Act (Northern Ireland) 2011 (the 2011 Act) set out that in Northern Ireland, the local development plan (LDP) for each of the 11 local authorities comprises a plan strategy (PS) and a local policies plan (LPP).
- 2.2 The PS represents the first formal stage of the two stage LDP process and Section 8(1) of the 2011 Act requires all Councils in Northern Ireland to prepare a PS for their districts. Section 8(2) advises that a PS must set out:
- (a) the **council's objectives** in relation to the development and use of land in its district (our emphasis);
 - (b) its **strategic policies** for the implementation of those objectives (our emphasis); and
 - (c) such other matters as may be prescribed.
- 2.3 It is worth noting that the requirements of a PS differ to those of a LPP, which are set out under Section 9(2) of the 2011 Act, these being:
- (a) the **council's policies** in relation to the development and use of land in its district (our emphasis); and
 - (b) such other matters as may be prescribed.
- 2.4 Essentially, the purpose of a PS is to provide the strategic policy framework for the plan area as a whole across a range of topics, whereas the purpose of the LPP is to set out the local policies and site specific proposals in relation to the development and use of land in its district.
- 2.5 Section 8(5) prescribes the following elements which a Council must take into account when preparing a PS:
- (a) the regional development strategy (i.e. the RDS 2035);
 - (b) the council's current community plan (i.e. The Belfast Agenda);
 - (c) any policy or advice contained in guidance issued by the Department (i.e. the SPPS); and
 - (d) such other matters as the Department may prescribe or, in a particular case, direct.
- 2.6 However, it is noted that Section 8(5) also provides the Council with discretion to have regard to such other information and considerations as appear to the council to be relevant.
- 2.7 In terms of form and content, Part 4 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 (the 2015 Regs) set out the relevant requirements.

It is important to highlight that regulation 12 (2) of the 2015 Regs states that '*A development plan document must contain a reasoned justification of the policies contained in it*'. Furthermore, regulation 12 (3) requires such reasoned justification of the policies to be clearly distinguishable from the policies.

2.8 The Department has set out a number of objectives within Development Plan Practice Note 07 - The Plan Strategy, dated April 2015, which should be incorporated in the PS. These objectives are reproduced below, as they have helped to guide our review, assessment and critique of Belfast City Council's Draft Plan Strategy:

- reflect longer term local aspirations, based on a vision, objectives and strategic policies agreed to by the community and stakeholders;
- provide a plan-led strategy specific to the area covered, to act as a basis for rational and consistent decisions about the use and development of land and identify interdependencies and relationships between places both within and across administrative boundaries;
- provide a settlement hierarchy which identifies settlements and their role within the hierarchy in accordance with the RDS 2035 Spatial Framework Guidance and any policy or advice issued by the Department such as the SPPS and the current community plan;
- allocate land for housing whilst taking account of the strategic objectives and guidelines contained in the RDS and any policy or advice issued by the Department such as the SPPS and the current community plan;
- facilitate economic development and the creation of employment whilst taking account of the RDS 2035 Spatial Framework Guidance and any policy or advice issued by the Department such as the SPPS, and the current community plan;
- facilitate sustainable patterns of growth and regeneration whilst promoting compact urban forms and protecting and maintaining distinctive local character and viability. This may include strategic zonings and/or policy areas where considered necessary;
- identify and define, as appropriate, transportation related proposals, whilst taking account of the RDS and regional transportation proposals contained in Ensuring a Sustainable Transport Future (ESTF);
- conserve, sustain and enhance the area's environmental qualities, local distinctiveness and sites of environmental importance in terms of landscape character and diversity, wildlife and habitats, townscape and archaeology;
- promote the development of sustainable tourism, recreational and other community facilities that will positively contribute to the amenity and wellbeing of the population; and
- facilitate the promotion of equality of opportunity and good relations between persons of different religious belief, political opinion or racial group.

- 2.9 The Department also advises councils to *'...aim to ensure that its PS is both realistic and deliverable taking into account the resources available and any potential constraints which may arise during the plan period (our emphasis). Furthermore, in order to allow for unforeseen circumstances, the Department directs councils to '...aim to incorporate a degree of flexibility within its PS to ensure that its objectives and strategic policies for its area can still be delivered' (our emphasis).*
- 2.10 Once drafted, a PS is required to undergo a formal 8 week period of public consultation and following this, all representations submitted will be made available for public inspection (counter representations) for a further 8 week period. The Department advises that all representations should provide evidence to demonstrate why the draft PS is unsound and/or how any proposed changes make the draft PS more sound.
- 2.11 Ultimately, the plan strategy will undergo an independent examination and must be found 'sound' if it is to be formally adopted.

3. Soundness in Plan Making

- 3.1 The keystone of the local development plan system is the principle of 'soundness'. Section 10(6) of the 2011 Act provides that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document:
- (a) whether it satisfies the requirements of sections 7 and 8 or, as the case may be, sections 7 and 9, and any regulations under section 22 relating to the preparation of development plan documents; and
 - (b) whether it is **sound**.
- 3.2 The Planning Act (Northern Ireland) 2011 does not define the meaning of 'soundness'. However, Development Plan Practice Note 6 - Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of 'showing good judgement' and 'able to be trusted'.
- 3.3 Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:
- how the development plan document (DPD) has been produced;
 - the alignment of the DPD with central government regional plans, policy and guidance; and
 - the coherence, consistency and effectiveness of the content of the DPD.
- 3.4 DPPN 6 advises that 'soundness' involves testing the principles, content and preparation process of the DPD against a list of key criteria. DPPN 6 then sets out the following tests which '...aim to provide a framework to assess the soundness of the DPD, whilst taking account of all relevant procedural, legislative and policy considerations':

Procedural tests

- *P1. Has the plan been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- *P2. Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- *P3. Has the plan been subject to sustainability appraisal including Strategic Environmental Assessment?*
- *P4. Did the council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?*

Consistency tests

- 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?

Coherence and Effectiveness tests

- CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans 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.
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

3.5 Although the tests of soundness are based upon three categories - procedural, consistency, coherence and effectiveness, there is a degree of overlap in terms of the criteria used for each test. The purpose of the IE will be to examine how the DPD meets each test and determine whether the DPD is sound as a whole.

4. George Best Belfast City Airport – An Overview

- 4.1 This section seeks to provide a brief overview of GBBCA.
- 4.2 The Airport has a strategic role as a key gateway and driver for creating a vibrant economy and air transport is one of the most powerful means of regional economic development. Direct and convenient air access is critical in supporting the ambitious growth aspirations set out in the Belfast Agenda. The Belfast Metropolitan Area Plan (BMAP) acknowledged the important strategic role of the Airport recognising that good access is fundamental to the economic and social wellbeing of Belfast and Northern Ireland overall. The Regional Development Strategy to 2035 also recognises the importance of 'gateways' for economic development and competitiveness.
- 4.3 GBBCA is also a major employer. In 2013, employment at the Airport was estimated at 960 jobs and the Airport's GVA was estimated at £37.3m. The Draft Plan Strategy should emphasise the importance of optimising existing airport capacity including the potential for airport growth resulting from the Planning Agreement modification process (to be concluded), improving access and other passenger/operating facilities and infrastructure. The Council should support this in line with the Airport's acknowledged economic role.
- 4.4 On the 23rd of February 2012 GBBCA submitted a request to the DOE to modify the 2008 Agreement to allow for removal of the Seats For Sale limit, the introduction of a noise control contour cap placed on the area within the city falling within the 57db LAeq 16h contour and for the introduction of other noise control measures.

5. Visions, Aims and Objectives

- 5.1 Our client is supportive of the following ambitious vision set out within the DPS:

'In 2035, Belfast will be a globally successful, smart regional city that is environmentally resilient with a vibrant economic and social heart. As a centre of learning and business, the knowledge economy flourishes where collaboration and innovation attracts investment, talent and jobs. We will value and conserve our unique natural and built heritage to enhance and develop tourism.

Thriving socially inclusive well connected neighbourhoods, that encourage a healthy active lifestyle with well-designed homes where people love to live. A strong, inclusive local economy will support progressive, safe and vibrant communities. The city will provide a gateway to opportunities locally, nationally and worldwide'.

- 5.2 However, our client submits that the DPS must be amended in line with the modifications sought within and throughout this submission, if it is to deliver upon its vision and satisfy the tests of soundness.
- 5.3 The evidence for supporting this stance is set out within the entirety of this submission.

6. Airport Safeguarding and Public Safety Zones

- 6.1 In developing the policies the Council should consider safeguarding.
- 6.2 BMAP highlighted the need to control development in Airport Public Safety Zones.
- 6.3 According to the SPPS 2015, *'LDPs should highlight Airport Public Safety Zones where appropriate. Within such zones a general presumption against development will apply. ' (our emphasis)*. These need to be identified at this stage.
- 6.4 The SPPS states that *'LDPs should zone land for known requirements for future expansion of sea ports and airports where appropriate. Development proposals adjacent to such facilities which would seriously jeopardise their future expansion should not be permitted'*.
- 6.5 Para 6.90 of the SPPS states that *'some proposed developments may be incompatible with nearby economic development enterprises, either already operating, or approved.'*
- 6.6 PPS 4 Policy PED 8 states that *'a proposal for development in the vicinity of an existing or approved economic development use that would be incompatible with this use or that would prejudice its future operation will be refused.'*
- 6.7 There has been no evidence provided which considers the existing contours and the potential for the Airport's noise contours to increase within the scope of the Planning Agreement modification process (to be concluded) when considering noise sensitive development in the vicinity of the Airport. This is in accordance with the International Civil Aviation Organisation (ICAO's) 'balanced approach' to noise management recognised in the UK Government's Aviation Policy Framework.
- 6.8 The Draft Plan Strategy is currently **unsound** as it fails to take account of the RDS, SPPS (para 6.90) and PPS4 (Policy PED 8) in providing a specific protective policy for the airport to prevent incompatible development of whatever kind. The protective policy should address both noise and public safety issues.

7. Representations to Strategic Policies

Policy SP1 Growth Strategy

- 7.1 GBBCA express general support for ambitious growth however the Draft Plan Strategy should recognise (similar to the RDS, Spatial Framework 2035 and BMAP) the role of Belfast as the regional capital and gateway for movement of people and goods through the seaport and airports. The airport will play a pivotal role in helping Belfast in support 46,000 additional jobs.
- 7.2 In line with the RDS and other strategies the Draft Plan Strategy should recognise the importance of optimising existing airport capacity including the potential for airport growth resulting from the Planning Agreement modification process (to be concluded), improving access. The Council should support this in line with the Airport's acknowledged economic role.

Recommendation:

- 7.3 In the justification and amplification section which supports the policy the Council should acknowledge that the Airport has a strategic role as a key gateway and driver for creating a vibrant economy and air transport is one of the most powerful means of regional economic development.

Policy SP7 Connectivity

SP7 is unsound as the policy fails the tests of CE 1, 2 and 3- Coherence and Effectiveness

The policy is not founded on a robust evidence basis which explains the rationale behind the policy and fails to consider the airport

Recommendation:

- 7.4 We suggest the Council amends Policy SP7 – *'The council will support connectivity to and within the city by sustainable transport modes, such as public transport, walking and cycling and support access to and from the airport which provides direct and convenient air access to locations outside of Belfast, including rest of the UK and beyond.'*
- 7.5 Considering the importance of the airport to Belfast it should be identified on the Figure 5.4.

8. Representations to Shaping a Liveable Place

Policy SD2 Settlement Areas

- 8.1 The airport falls within the Belfast harbour area as identified by Figure 6.2 although the actual airport is not specifically identified unlike the rail stations and rail halts. In addition to providing a gateway for goods, visitors and tourists the airport is frequently used by businesses.

Recommendation

- 8.2 Suggest that Figure 6.2 is updated to include the airport and similar to the rail stations the airport is recognised as a key gateway which has a regional role, providing strong connectivity to locations outside of Belfast, the rest of the UK and beyond.
- 8.3 Paragraph 6.2.1 bullet point six should be amended to refer specifically to the airport – *‘Ensure better integration between land use planning and transportation particularly sustainable transport modes such as walking, cycling and public transport **and the port and the airport.**’*
- 8.4 Paragraph 6.2.12 should be amended to refer to the use of the airport by businesses and also reference to made to safeguarding and the need to control development in Airport Public Safety Zones and cross refer to the specific policy as recommended in Section 6.

Policy DES4 – Advertising and signage

DES4 is unsound as the policy fails the tests of CE 1, 2 Coherence and Effectiveness

No consideration of the RDS and PPS17

- 8.5 The RDS seeks to promote regional gateways including the Port of Belfast, the Belfast Harbour lands and Belfast City Airport as economic development opportunities and although it makes no specific reference to advertising Policy ECON 8.2 seeks to enhance “first impression points” and their environmental image by creating gateways which are welcoming arrival areas, user friendly and of a high environmental quality to present a favourable initial image.
- 8.6 Paragraphs 10 and 11 of Annex A to PPS17 also deals specifically with freestanding advertisement displays which it states are often found at airports and ports where they generally provide information on the locality, local events and services.

Recommendation

- 8.7 Policy DES4 (a) to be amended – *‘Are of good design, are located sensitively within the streetscape **and gateway locations** and do not have a negative impact on amenity.’*

9. Representations to Creating a Vibrant Economy

TLC3 - Overnight visitor accommodation

TLC3 is unsound as the policy fails the tests of CE 2 and 4 Coherence and Effectiveness

No reasonable alternatives have been considered

- 9.1 The proximity of the Airport to the city centre is an unusual advantage. The Airport was recently named the most convenient airport in the UK and Ireland and the 6th most convenient airport in the world by the Daily Telegraph. This is a key benefit to the City, allowing tourists and business visitors to land and reach the city centre within minutes. The Airport is important in facilitating inbound tourist visitors. Northern Ireland welcomed record levels of 1.9m visitors from outside NI in the first nine months of 2016, 10% more than Jan-Sept 2015. The Airport serves a range of UK and European destinations including London (London City, and Heathrow airports) Malaga, Palma and Amsterdam.
- 9.2 As currently drafted we would argue that the policy is unduly restrictive and it should allow for overnight visitor accommodation at this gateway location similar to other airports throughout the UK and Ireland.

Recommendation

- 9.3 We would recommend that the policy is revised to allow for overnight visitor accommodation at the airport which is a gateway location.

10. Representations to Building a smart connected and resilient place

Policy ITU 1 Telecommunications development

ITU 1 is unsound as the policy fails the tests of CE 2 and 4 Coherence and Effectiveness

No reasonable alternatives have been considered

Recommendation:

- 10.1 Amend Policy ITU 1 to state that ‘Developers will be required to demonstrate that proposals for telecommunications development have regard to technical and operational constraints including aviation safety....’

Transportation

- 10.2 The airport is recognised as a key gateway which has a regional role, providing strong connectivity to locations outside of Belfast to the rest of the UK and beyond. Regional guidance within the RDS seeks to deliver a balanced approach to transportation infrastructure by improving connectivity and this should be reflected in the LDP aims.

Recommendation

- 10.3 Figure 9.2 should be updated to include the airport.
- 10.4 An additional aim should be added – ‘protect and optimise access to and from the airport.’

11. Promoting a green and active place

Policy ENV1 Environmental Quality

ENV2 is unsound as the policy fails the tests of CE2 and CE3 Coherence and Effectiveness

- 11.1 The requirement for development to ‘positively address’ protection of the city’s designated quiet areas goes beyond DAERA’s guidance on the management of quiet areas and therefore the policy is unsound.

Recommendation

- 11.2 Policy re-drafted.

ENV1

Planning permission will be granted for development that will maintain and, where possible, enhance environmental quality, and protects communities from materially harmful development. Development must not result in an unacceptable adverse impact on the environment, including the following considerations:

- *Ground contamination;*
- *Air quality, including local air quality, particularly nitrogen dioxide and particulates (including in air quality management areas);*
- *Water quality;*
- *Noise, including impact on the city’s designated quiet areas and quiet times of day for businesses (daytime) and residents (night time); and*
- *Light pollution.*

The council will also require development to positively address the following:

a. Existing land contamination and ensuring development does not cause contaminated land or pollute water;

~~b. Local air quality, particularly nitrogen dioxide and particulates (including in air quality management areas);~~

~~c. Protection of the city’s designated quiet areas and quiet times of day for businesses (daytime) and residents (night time); and~~

d. The need to limit the city’s contribution to light spillage and ‘sky glow’

Appendix 1: Draft Plan Strategy 2035

Draft Plan Strategy

Spatial Development Strategy

6.2.12 the harbour and George Best City Airport provide a high quality gateway by sea and air for goods, visitors and tourists. The full extent of the Belfast Harbour area will be defined within the council's Local Policies Plan.

Shaping a Liveable Place

Policy DES3 – Tall buildings – (h). Comply with all necessary civil aviation requirements and not interfere, to an unacceptable degree, with telecommunications, television and radio transmission networks.

Creating a Vibrant Economy

Para 8.1.1 Belfast is an important economic gateway to Northern Ireland with an extensive port, airport, rail and road infrastructure. It provides a competitive strategic position in proximity to Europe, with the advantage of operating in the same time zone, regulatory environment and is ideally situated between mainland Europe and the U.S. The city has a strong engineering heritage with an international reputation with companies developing innovative components for the aerospace, automotive, technology and energy sectors.

Building a smart connected and resilient place

Policy TRAN 7 – Access to protected routes

The council will restrict the number of new accesses and control the level of use of existing accesses onto protected routes as follows....

Para 9.4.26 There is a long established policy of restricting access onto protected routes. These routes comprise: Primary routes; Routes between the principal town in each district and/or cross border; Routes to ports and airports; and Selected routes with high traffic flows.

Policy ITU 4 – Renewable energy development

(j). That no part of the development will have an unacceptable impact on roads, rail or aviation safety;

Technical Supplement 3: Employment and Economy

Belfast City

The Harbour Area has a vital role in the promotion of Belfast as the regional capital and focus for major employment opportunity. Port lands encompass 1565ha on the former Harland and Wolff Shipyards on Queens Island now referred to as the Titanic Quarter; Duncrue Industrial Estate, the North Foreshore and George Best City Airport.

The Harbour Area Strategy seeks to facilitate and promote further development of the Port and Airport the major gateways to Northern Ireland by sea and air; provide employment

opportunities to strengthen the role of BMA as the regional economic driver and improve accessibility.

Harbour

Belfast Harbour is a major employment location extending for approx 800ha to include the site of a former terminal building on a small portion of land abutting the Sydenham Bypass to the southeast of the City Airport.

George Best City Airport

The development plan gives favourable consideration to proposals that are clearly related to and dependant on a site near the airport in order to capitalise on the potential provided by the concentration of people and goods at the regional gateway. Such airport related employment uses may include airline sale/reservation and booking offices, maintenance, supply and manufacture of airport equipment and warehousing for freight handlers for example. Bombardier Aerospace a worldwide manufacturer of aerospace/aeronautical equipment is situated within proximity to the airport.

Regional Development Strategy

SFG 4 manages the movement of people and goods within BMA to integrate land use and transport so that people can access employment opportunities. Belfast LDG is the regional city gateway for the seaport and the City Airport and SFG15 strengthens these gateways for regional competitiveness of goods and passenger traffic and further recognises that the region can benefit from collaboration with its North/South and East/West neighbours to boost economic performance.

The RDS recognises Belfast as the regional capital and gateway for movement of people and goods through the seaport and airports. A strategic and integrated transport network sits at the heart of increasing economic competitiveness of Belfast and its export sector in the movement of freight.

Technical Supplement 14: Transportation

BMAP

Regional Gateways- in relation to the regional gateways, the Plan Strategy & Framework acknowledges the important strategic role of Belfast Port and the George Best Belfast City Airport.

In relation to the George Best Belfast City Airport, the Plan Strategy highlights the proximity of the **airport to a large residential population** and acknowledges that a Planning Agreement is in place to **control the environmental impact of airport operations on nearby residents**.

It is considered that the proposed widening of the A2 Sydenham Bypass will improve accessibility to the airport. The BMAP Plan Strategy and Framework notes that policy exists to **control activity and development within Public Safety Zones close to the ends of airport runways**.

Belfast Harbour Area

The District Proposals reiterate the Plan Strategy in terms of the important role of the Port and City Airport as gateways to the City and sets out a Belfast Harbour Area Strategy which seeks to facilitate development of the Port, protect and promote the City Airport and develop a new

City Quarter at Titanic. The Strategy seeks to enhance the City's gateway role and encourage riverside renewal. In addition to encouraging employment, the Belfast Harbour Area Strategy seeks to improve accessibility from other parts of the city and the wider region.

Belfast City Airport

The District Proposals recognised that an Article 40 Planning Agreement currently controls the level of airport operations at the City Airport. Furthermore, there are no plans to alter the provisions of the Agreement within BMAP.

In addition, Policy BHA02 Airport Safeguarding states that planning permission will not be granted for development proposals which would adversely affect airport safeguarding operations.

Appendix 2: Proforma

Belfast LDP 2035 - Plan Strategy

Overview

We're developing the new Local Development Plan (LDP) which is the land use plan for Belfast up to 2035. The Plan will guide investment and set out policies and proposals for the use, development and protection of land across the city. Once adopted the plan will be used to determine planning applications. It will take approximately four years to develop and formally adopt the new LDP.

A series of consultation stages are built into the process for creating the LDP and are defined by legislation to help local people input into this Plan. We are currently undertaking the second stage of the consultation process in relation to the draft Plan Strategy.

Your opinions matter to us and we want to hear from you during the various stages throughout the preparation of the plan. While you can provide feedback using this form, we encourage you to use our online questionnaire via the Council's Consultation Hub at: <https://yoursay.belfastcity.gov.uk/>. The consultation closes on 15th November 2018.

What is the LDP?

The LDP:

- Guides development
- Provides certainty and a framework for investment
- Facilitates sustainable growth
- Puts communities at the heart of the process
- Allows for speedier decision making under the new plan-led system

How will this impact on me?

Our LDP will have an impact on everyone who lives, works and visits Belfast because it will shape how the city will develop in the future. Your views are important so we'd like you to get involved in its preparation.

What is the Plan Strategy?

The Plan Strategy will be a strategic policy framework for the plan area as a whole across a range of topics. It will set out an ambitious but realistic vision for Belfast as well as the objectives and strategic policies required to deliver that vision. Establishing this strategic direction early in the plan process will provide a level of certainty on which to base key development decisions in the area as

well as the necessary framework for the preparation of the Local Policies Plan. You can find out more about the Plan Strategy, and access all relevant documents, on the Council's website at:

www.belfastcity.gov.uk/LDP.

Accessibility

The relevant documents are available, on request, in alternative formats - Braille, audio, large print, easy read. The council will also consider requests to produce it in other languages. If you require the documents in these or other formats please contact us:

Belfast Planning Service
Belfast City Council Cecil
Ward Building
4-10 Linenhall Street Belfast
BT2 8BP

Telephone: 028 9050 0510

Email: **localdevelopmentplan@belfastcity.gov.uk**

A. Data Protection

Belfast City Council is the Data Controller under the General Data Protection Regulation (GDPR) for the personal data it gathers for the purposes of sending regular email updates on the Local Development Plan from Belfast Planning Service.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the independent examination process.

The council accepts that you are providing your personal data on the basis of consent and are positively agreeing for the council to hold and further use it, publish it (without personal information such as name and email, but will include organisation). Belfast City Council must also share it with the Department for Infrastructure and whoever they appoint to undertake the independent examination.

Any personal details that you provide the Council will be handled in accordance with the GDPR and Data Protection Act 2018. As such we will only use your data for the purposes that you have given this information for and will only be shared where necessary to provide the service that you are contacting us about. If you would like further information in regards please see the website belfastcity.gov.uk/about/privacy

The personal data is held and stored by the council in a safe and secure manner and in compliance with Data Protection legislation and in line with the council's Records Retention and Disposal Schedule.

If you wish to contact the council's Data Protection Officer, please write to:

Belfast City Council,
City Hall Belfast,
BT1 5GS

or send an email to records@belfastcity.gov.uk

Q1. Please tick to confirm that you have read and understood the privacy notice above.

(Required)

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?

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Even if you opt for your comments to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the inspectorate they appoint to oversee the examination in public into the soundness of our plan. This will be done in accordance with the privacy statement above.

(Required)

Please select only one item

Yes, with my name and/or organisation

Yes, but without my identifying information

B. 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?

(Required)

Please select only one item

- Individual *(Fill in the remaining questions in this Section, then proceed to Section C)*
- Organisation *(Fill in the remaining questions in this Section, then proceed to Section D)*
- I'm an Agent *(Fill in the remaining questions in this Section, then proceed to Section E)*

Q4. What is your name?

Title

Mrs

First Name (Required)

Sheila

Last Name (Required)

Murphy

Q5. What is your telephone number?

Telephone number

[REDACTED]

Q6. What is your email address?

[REDACTED]

Q7. Did you respond to the previous Preferred Options Paper consultation phase?

(Required)

Please select only one item

- Yes No Unsure

If yes, and you have your previous response ID (beginning ANON) please enter it here:

[REDACTED]

C. Individuals

If you are responding as an individual, please complete this Section, then proceed to Section E

Q8. What is your address?

Address Line 1 (Required)

Line 2

Line 3

City (Required)

Postcode (Required)

D. Organisation

If you have selected that you are responding as an organisational respondent, there are a number of pieces of information that we are legally required to gather from you.

Q9. If you are responding as a representative of a group or organisation, please complete this Section, then proceed to Section E.

Organisation (Required)

Your Job Title (Required)

Organisation address (if different from above):

Address Line 1 (Required)

Line 2

Line 3

City

Postcode (Required)

E. Agents

If you have selected that you are responding as an agent on behalf of other people/organisations, there are a number of pieces of information that we are legally required to gather from you.

Q10. Please provide details of the organisation or individual you are representing: The name of the organisation or individual you are representing: (Required)

George Best Belfast City Airport

Client contact details:

Title

Mrs

First Name (Required)

Laura

Last Name (Required)

Duggan

Address Line 1 (Required)

George Best Belfast City Airport

Line 2

Line 3

City

Belfast

Postcode (Required)

BT3 9JH

Telephone number (Required)

Email address (Required)

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

(Required)

Please select only one item

Agent Client Both

F. 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?

(Required)

Please select only one item

I believe it to be sound (*Proceed to Section G*)

I believe it to be unsound (*Proceed to Section H*)

G. Sound

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

(Required)

Please refer to content of report

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

H. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Refer to supporting report

Policy (if relevant)

Refer to supporting report

Q15. 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, available at:

<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

- 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?
- ✓ 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
- ✓ CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Q16. 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 refer to supporting document

Q17. 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.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Please refer to supporting document

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

I. Type of Procedure

Q19. Please indicate if you would like your representation to be dealt with by:
(Required)

Please select only one item

- Written representations (Choose this procedure to have your representation considered in written form only.)
- Oral hearing (Choose this procedure to present your representation orally at the public hearing event(s))

Unless you specifically request a hearing, an independent examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note however that an independent examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Turley Office
Hamilton House
3 Joy Street
Belfast
BT2 8LE

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