

15th November 2018

DPS-B-8R-N

Local Development Plan Team
Belfast Planning Service
Ground Floor
Cecil Ward Building
4-10 Linenhall Street
Belfast
BT2 8BP

Dear Sir/Madam,

RE: BELFAST LOCAL DEVELOPMENT PLAN 2035 - DRAFT PLAN STRATEGY.

I refer to the above draft Local Development Plan (LDP) and have been requested by my clients to object to the following LDP Housing Policies:

Policy HOU1 – Accommodating New Homes.

The proposed provision of 31,660 dwelling units including 8,000 dwellings in the city centre and 3,500 dwellings in the Harbour Estate are unrealistic and not achievable in the LDP timescale.

The indicative average building rates set out in policy HOU1 are entirely unrealistic compared to current annual building rates.

In the current climate with the significant economic and political instability over Brexit the assumption that the economic performance of the city will continue to increase is one that has a significant degree of uncertainty.

The population densities set out in Policy HOU4 clearly indicate that the overwhelming majority of housing development in Belfast City Centre and the Harbour estate will be medium level apartment/flat development and will not cater for young families.

Trying to achieve this level of new house building while requiring that all new housing development within the plan area will be delivered on previously developed land is clearly not realistic considering the scale of current and past building rates per annum and the fact that much of this was achieved on greenfield housing sites, which are always easier to develop.

Policy HOU2 – Windfall Housing.

We do not believe that all of Belfast's new housing development within the plan area can be delivered on previously developed land within the existing urban footprint due to the difficulties often faced with trying to develop brownfield land.

We also do not believe that the land required for housing within the plan area in the small settlements of Edenderry and Loughview can be or should be delivered on brownfield land within the existing urban footprint. This housing land must be delivered within the small settlement.

In terms of the criteria set out in Policy HOU 2 no definition is provided of what is considered "suitable" for criteria (a). No criteria other than criteria (b) and (c) are provided for what is considered "suitable". In terms of criteria (b) no definition is provided for what is considered "accessible" or "convenient".

Policy HOU4 – Density of Residential Development.

Policy HOU4 imposes density bands on various character areas within Belfast which promotes high density apartment/flat development within medium level flat blocks rather than conventional family dwellings. This high density development will often be out of keeping and character with surrounding development in the immediate area. High density forms of development will therefore be the norm rather than conventional dwellings.

Policy HOU5 – Affordable Housing.

We object to the wording and substance of this policy.

Policy HOU5's requirements for provision of a minimum of 20% of units of affordable housing on sites greater than 0.1 hectares and/or 5 or more dwellings is unrealistic and unacceptable in the context of the NI housing market.

It may result in developers building elsewhere to build houses in other Council areas where policy is more flexible. It may result in a significant slowdown in the amount of planning applications for new housing development. It will require the preparation of financial viability assessments and this approach will require skilled multi-disciplinary teams within the Council including housing, planning, legal and surveying professionals. This will further likely slowdown the submission, consideration and determination of planning applications for housing development.

We note that Policy HS2 of PPS12 set out no thresholds in terms of social/affordable housing. The Department abandoned the development of PPS 22 Affordable Housing due to the precarious economic state of the NI housing market. It is not considered that the housing market has recovered to the extent to accommodate the financial impacts this draft policy will have on housing developers.

In the Northern Area Plan 2016 Policy HOU2 – Social and Supported Housing set out the thresholds for affordable housing of a minimum of 20 per cent at more than 25 residential units or on a site of 1 hectare or more. This is a more realistic policy which only captures larger planning applications for housing development and I would suggest that this sets more realistic thresholds than Draft Policy HOU 5.

There also needs to be flexibility within the policy to allow developers to provide off site provision or an appropriate financial contribution in lieu of on site provision within the draft policy.

If affordable housing is being provided on site I believe this can be dealt with by planning condition rather than legal agreement.

The NPPF states at Para. 63 “to support the reuse of brownfield land, where vacant buildings are reused or redeveloped, any affordable housing contribution should be reduced by a proportionate amount..” I see no similar concession within Policy HOU 5.

There are legal, logistical, organisational and management difficulties for both housing associations and housing development in draft Policy HOU5's requirement for the “pepper potting” of affordable housing through a new residential development.

I reserve the right to amplify and elaborate on these objections above at a later date after having sight of any Council Statement of Case or rebuttal to these objections.

However, if the Council wishes to discuss these matters please contact the undersigned.

Best regards,

