

Submitted to **Belfast LDP 2035 - Plan Strategy**  
Submitted on **2018-11-15 12:43:35**

## 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, with my name and/or organisation

### 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:**

Individual

**Q4. What is your name?**

**Title:**

Ben

**Full Name:**

McClelland

**Q5. What is your telephone number?**

**Telephone number:**

██████████

**Q6. What is your email address?**

**Email:**

██████████

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

No

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

### 3. Individual

**Q8. What is your address?**

**Address Line 1:**

57 Rugby Road

**Line 2:**

**Line 3:**

**City:**

Belfast

**Postcode:**

BT7 1PT

### 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::**

7.1.6.2

**Policy (if relevant):**

HOU10 Housing Management Areas

**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:**

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, 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:**

CE2 - I live in an area marked as an HMA and despite the previous BMAP stating similar restrictions on further development the number of HMO and flat conversions has continued unchallenged. Essentially every planning application that local residents have objected to on the grounds of overcrowding, and existing infrastructure not being able to cope has been granted and we're approaching 90% HMO density in this area. The strategy and policy is not realistic if it is not going to be enforced.

CE3 - The plan talks about shaping a liveable space and building community cohesion and good relations yet there do not appear to be any mechanisms in this plan for monitoring and promoting community cohesion. Nor is there any strategy to restore HMA areas to the residential quality which they once enjoyed 20 years ago.

**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?:**

I believe that the plan needs very clear guidance to Council, that may not be overridden or ignored, that no more HMOs or high-density flat conversions can be created in HMA areas.

The plan needs to consider a method for measuring community cohesion and to set out steps to improve it where cohesion has broken down.

I believe the plan needs to consider areas where HMOs are massively overprovisioned (> 50%) and actively plan to reduce them in order to restore community cohesion and reduce antisocial behaviour.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**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:**

Written representations