

Response ID [REDACTED]

Submitted to **Belfast LDP 2035 - Plan Strategy**  
Submitted on **2018-11-12 08:00:27**

## 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:**

Individual

**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?**

Unsure

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:**

[REDACTED]

**Line 2:**

**Line 3:**

**City:**

[REDACTED]

**Postcode:**

[REDACTED]

**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

**8a. Sound**

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

**Reasons for support:**

f

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

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**8b. Unsound**

**Q14a. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

5.7

**Policy (if relevant):**

SP7 Connectivity

**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:**

CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**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:**

The move in the plan towards reducing reliance on private cars is fundamentally flawed. There is an increasing, global move towards tailored products and services, and transport is no exception. I can drive to work within 15 minutes each way, whereas a trip by public transport involving walking and buses will take a minimum of one hour, ie, at least an additional 7.5 commuting hours each week, equivalent to a working day. I will not sacrifice this time. It is unrealistic to expect people to do so, and a plan based on that premise will not work.

The policy mentions air pollution caused by private vehicles. An IBM survey estimates that over 30% of urban air pollution is caused by drivers looking for parking spaces. A parking strategy which accommodates residential, office and leisure uses must be developed and properly implemented to offset this risk.

The plan takes no account of the impact of autonomous vehicles. At least 10% of vehicles will be driverless by 2035, yet the plan makes no mention of what will be the most disruptive change to urban design and transport since the invention of the car. There is no attempt to plan for this seismic shift in how people move about a city and region.

There is a real opportunity for Belfast City Council to truly act as leaders in embracing new technology to improve the lives of citizens, and the competitiveness of the city. Luiz Martinez (Urban Mobility System Upgrade: How shared self-driving cars could change city traffic) has modelled travel patterns in a medium-sized European city and calculated that if city inhabitants used fleets of shared autonomous taxis rather than privately owned cars and public transportation, the number of vehicles on the city's roads could be reduced by 90%. Belfast could be at the forefront of capitalising on this, or can impede its development by investing in public transport infrastructure which will actively hinder the uptake of new technologies, as policy makers will adopt a 'too much invested in public transport to quit' approach. The cost of not planning for this massive change will be counted in lives lost in vehicle accidents, time wasted commuting, increased pollution and loss of opportunities and competitiveness.

**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?:**

Please invest in making commuting by private vehicles easier and more efficient. Embrace smart traffic lights and artificial intelligence in planning flexible traffic flows. Bring together real-time parking information in one place which is easy for consumers to access to help them plan better, thus reducing journey time and pollution.

Encourage ride-sharing and provide assurance to the public that it is safe by leading the way on a registration scheme.

Consider parking carefully, and develop a culture of shared spaces at different times of the day. Actively discourage residents stealing and using traffic cones to prevent commuters from using spaces during the day.

Learn from the lessons of the UK Autodrive project. Consider carefully the need for connected vehicles vs autonomous vehicles. Start testing the possibilities now.

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**Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

## **8b. Unsound - Second Submission**

**Q14b. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph:**

**Policy (if relevant):**

HOU5 Affordable Housing

**Q15b. 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:**

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

**Q16b. 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:**

The provision of affordable housing is to be welcomed. Unfortunately the policy does not address social housing. It states that 'affordable housing (a mix of social rented and / or intermediate housing) will be secured by way of section 76 planning agreement, which should be in place in advance of planning permission being granted'. I cannot see how a private developer will be in a position 5 or 10 years after the completion of a scheme to guarantee that dwellings remain 'affordable'. I also do not see how a private developer will be able to provide 'social rented housing' unless they are to be registered and regulated by the 'DSD' (DFC).

Having attended a number of consultation events in relation to this plan, and talked to numerous other people who attended, we were collectively concerned by our perception that BCC staff felt the 20% affordability requirement was a 'tick-box' they had to check, rather than something which will make a lasting difference to tenancy and home ownership in the city.

**Q17b. 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?:**

Insist on legally binding design and build contracts between private developers and housing associations.

Encourage and enable housing associations to bid for development opportunities, both as partners and as lead agents.

Provide mechanisms and opportunities for partnerships between the private development sector and housing associations.

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

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**Q18b. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

## **8b. Unsound - Third Submission**

**Q14c. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

**Policy (if relevant):**

EC7 Higher Education Institutions

**Q15c. 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:**

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

**Q16c. 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:**

Mention is made of the importance of higher education institutions. However, the purported aim of promoting the growth and expansion of these institutions is in conflict with other policies. While Ulster University has been allowed to develop modern city-centre facilities, Queen's University is hampered by the fact that it is beautiful. New development in the Queen's quarter is constrained by height regulations, and conservation-related concerns.

This in turn hampers the ability of Queen's to contribute to the local economy. There is an ever-growing demand for the high quality graduates produced by Queen's University. However, the numbers of graduates are constrained both by policy but also by the inability of the university estate to cope. For instance, there is insufficient space in the computer science building to accommodate a first year intake of 400 computer science students. This pressure on space in turn affects student experiences and therefore reflects badly on both Queen's University and Belfast when it comes to published satisfaction surveys.

**Q17c. 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 understand the need to protect the townscape heritage of this historic area of Belfast. However, consideration must be given to developing facilities which match the ambition of the city and Queen's University as an institution. For example, the redevelopment of the Students' Union site should be allowed to take place over at least 6 floors to accommodate current student population, which is 5 times that of the student population for which the existing building was developed.

Priority should also be given to securing land banks in the area for the purposes of expanding the university. The amount of small-scale, piecemeal development in the area should be reduced.

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**Q18c. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

## **8b. Unsound - Fourth Submission**

**Q14d. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

**Policy (if relevant):**

SP1 Growth Strategy

**Q15d. 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:**

C2 - Did the council take account of its Community Plan?, 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?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16d. 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:**

I have concerns regarding the growth strategy and the associated spatial development strategy. In particular, I have concerns that the 'innovation district', which abuts North Belfast, will, without proper management, cause further inequalities in education, income and health in the north of the city. This clearly does not match with 'sustainable and inclusive development (being at) the heart of the LDP'.

North Belfast has extremely high levels of poor health, low educational attainment and high levels of deprivation. I believe residents have a right to be concerned that the development of an 'innovation district' will exacerbate these problems, unless there are jobs and opportunities for the local population.

When I raised this at a consultation session, I was told that Belfast City Council 'doesn't care who gets the jobs, as long as they (the jobs) are in Belfast'. Staff said they would rather have a good job filled by a commuter from Bangor than a low income job for a local person. When one participant raised the low number (3) of local people with jobs in the gasworks site, staff just laughed and shrugged. When pressed, they said the purpose of this plan was to develop the city, not the people and that other plans would have to address people.

**Q17d. 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?:**

The city of Belfast is a system, and each element within the system relies on another. We cannot produce a development plan which does not have people at its

heart, and I am gravely concerned if this is BCC's aim.

BCC must immediately begin a programme of upskilling local people to be in a position to compete for jobs which will be in place in the new district. One plan cannot succeed at the expense of another, and at the expense of the people of this city. Local training and development agencies must be supported to engage with employers, determine needs, and work in partnership with further and higher education to fulfil employer requirements and employee aspirations.

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**Q18d. 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