

# Representations to Belfast City Council Draft Plan Strategy 2035

On behalf of Belfast Harbour

November 2018

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**Client**

Belfast Harbour

**Our reference**

BHCB3003

November 2018

## Executive Summary

1. This representation is submitted on behalf of Belfast Harbour who welcomes the opportunity to submit comments on the draft plan strategy issued by Belfast City Council (BCC).
2. Belfast Harbour shares the Council's general ambition for growth and is actively seeking to deliver it through both port operation and real estate strategies. Belfast Harbour wants to work with the Council to ensure that the policy framework in the LDP is consistent with its own ambition.
3. Having reviewed and considered the Local Development Plan as issued, we consider the Plan to be unsound. The legal compliance tests have not been met, and the following policies contained within the Draft Plan Strategy are unsound. The table below summarises the changes sought.

### **Schedule of Key Comments**

Policy	Comment	Cross ref.
SP1	<i>Growth Strategy</i> <b>Change required</b> <i>Remove reference to phasing</i>	<i>Section 5 paragraphs 5.1 – 5.3</i>
SP8	<i>Green and Blue Infrastructure Plan</i> <b>Change required</b> <i>Suggest the Council incorporate their specific aspirations for Green and Blue infrastructure which have reached an advanced stage and should be integral to the plan strategy</i>	<i>Section 5 paragraphs 5.4 to 5.8</i>
SD3	<i>City Centre</i> <b>Change Required</b> <i>Suggest the use of appropriate language to allow broad areas of focus which do not prevent 'non-conforming' uses which are otherwise acceptable in policy terms. The general thrust should be towards supporting investment across all parts of the City Centre, as per the policy framework in the draft Plan Strategy which, in the main, does not adopt a granular approach to different land uses - such as housing and offices - within discrete parts of the City Centre</i>	<i>Section 5 paragraphs 5.9 to 5.13</i>
HOU 6	<i>Housing Mix</i> <b>Change Required</b> <i>The policy be deleted as it duplicates provisions already set out in HOU5</i>	<i>Section 5 paragraphs 5.14 to 5.21</i>

HOU 8	<p>Specialist Residential Development</p> <p><b>Change Required:</b></p> <p><i>Remove requirement for needs test</i></p>	<p>Section 5 paragraphs 5.23 to 5.24</p>
DES 3	<p>Tall Buildings</p> <p><b>Change Required:</b></p> <p><i>Policy reconsidered and suggested amends to criteria (a),(c), (d,) (e), (f) and (g)</i></p> <p><i>Request that Council clarifies whether a locational or criteria based policy is being proposed</i></p>	<p>Section 5 paragraphs 5.25 to 5.42</p>
EC7	<p>Higher education institutions</p> <p><b>Change Required</b></p> <p><i>Require consideration of broader policy heading as Catalyst Inc interpretation suggests wider innovation and economic impacts outside educational provisions</i></p>	<p>Section 5 paragraphs 5.43 to 5.46</p>
RET6	<p>Temporary and meanwhile uses</p> <p><b>Change Required</b></p> <p><i>The policy should be amended to remove criteria (e) and (f) to ensure the dynamic essence of meanwhile uses are not diluted.</i></p>	<p>Section 5 paragraphs 5.47 to 5.48</p>
CC1	<p>Development opportunity sites</p> <p><b>Change Required</b></p> <p><i>Reconsideration to be given to use of language as restrictive to open competitiveness and market conditions. Development opportunities are not solely restricted to those areas which are subject to masterplan proposals.</i></p>	<p>Section 5 Paragraphs 5.49 to 5.51</p>
W1	<p>Environment impact of a waste management facility</p> <p><b>Change required</b></p> <p><i>Policy should be amended to allow development in a port area as reflected in Policy W2 waste collection and treatment facilities.</i></p>	<p>Section 5 paragraphs 5.52 to 5.53</p>
TRAN8	<p>Car parking and servicing arrangements</p> <p><b>Change required</b></p> <p><i>Incorporate a flexible approach to ensure operational requirements and investment opportunities can be catered for. This could involve consideration of a band of higher parking provision where public transport accessibility is limited beyond traditional core working hours</i></p>	<p>Section 5 Paragraph 5.54 to 5.58</p>
NH1	<p>Protection of natural heritage resources</p> <p><b>Change required</b></p> <p><i>Amend policy provisions to exclude the requirement for a setback of 5m within port areas such as wharfs and quays.</i></p>	<p>Section 5 Paragraph 5.59 to 5.60</p>

# 1. Introduction

1.1 This submission sets out Belfast Harbour's position and response to the Belfast Local Development Plan, Draft Plan Strategy 2035 proposals. Belfast Harbour has also submitted a separate response with Titanic Quarter Ltd in respect of Titanic Quarter interests.

- Section 2 provides a strategic position in respect of Belfast Harbour's synergy with Council aspirations
- Section 3 considers the legislative context of the plan
- Section 4 addresses soundness in plan making
- Section 5 considers the aspects of policy which Belfast Harbour considers to be unsound
- Section 6 outlines those areas of the draft plan strategy which Belfast Harbour is supportive of; and
- Section 7 provides comment in respect of the plan's intention to introduce supplementary planning guidance

1.2 A completed copy of Belfast City Council's pro forma response to the Draft Plan Strategy is located at **Appendix 1**.

## 2. Strategic Position

- 2.1 The Belfast Harbour and Belfast City Council 'Agendas' for the City are closely aligned. Belfast Harbour agrees with the Local Development Plan (LDP) Vision and the Strategic Aims which underpin it and welcomes the consistency of approach set out within the Draft Plan Strategy. Belfast Harbour shares the Council's objectives to shape a liveable, smart, connected, resilient, green and active place and create a vibrant economy.
- 2.2 Belfast Harbour shares the Council's general ambition for growth and is actively seeking to deliver it through both port operation and real estate strategies. Given the regionally significant nature of the Port, Belfast Harbour particularly supports the emphasis on Belfast as a driver of the regional economy, helping to improve competitiveness with other Cities elsewhere.
- 2.3 In general Belfast Harbour wants the LDP to recognise the significance of the Harbour's operations and investments in underpinning the growth of the regional economy and its role going forward as a key partner in the stewardship of strategic infrastructure.
- 2.4 In terms of port operations, Belfast Harbour wants the LDP, and the interface with the planning system generally, to recognise the importance of the port as the principal maritime gateway on the island of Ireland. To the extent that planning permission is required for future investment in port related infrastructure, and recognising the primacy of the plan in the new planning system, Belfast Harbour want a plan which establishes a positive local policy context, acknowledging the shared objective of protecting Belfast Lough and other important environmental assets.
- 2.5 In terms of real estate, Belfast Harbour will continue to bring forward City-shaping mixed use developments at City Quays (which benefits from an extant outline planning permission) and Titanic Quarter (development framework, currently under review) and continue to provide a broad range of employment orientated product elsewhere in the wider Estate. Belfast Harbour wants to work with the Council to ensure that the policy framework in the LDP is consistent with its own ambition.
- 2.6 Individual policies within the draft Plan Strategy should not have the unintended consequence of limiting Belfast Harbour's ability to responsibly contribute to City and regional growth, as this would undermine the soundness of the Plan Strategy. This premise has informed Belfast Harbour's approach when reviewing and responding to the draft Plan Strategy and we welcome the opportunity to comment on a policy by policy basis.

### 3. Legislative Context

- 3.1 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).
- 3.2 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.
- 3.3 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.
- 3.4 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<sup>1</sup>, 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<sup>2</sup>.
- 3.5 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.
- 3.6 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.

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<sup>1</sup> Development Plan Practice Note 07 - The Plan Strategy, April 2015

<sup>2</sup> Development Plan Practice Note 08 - The Local Policies Plan, April 2015

3.7 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.

3.8 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.
- 3.9 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).
- 3.10 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<sup>3</sup>.
- 3.11 Ultimately, the plan strategy will undergo an independent examination and must be found ‘sound’ if it is to be formally adopted.

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<sup>3</sup> Development Plan Practice Note 07 - The Plan Strategy, April 2015

## 4. Soundness in Plan Making

- 4.1 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.
- 4.2 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’.
- 4.3 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.
- 4.4 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.

4.5 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.

## 5. Challenges to soundness

- 5.1 Challenges to the soundness of the Draft Strategy are outlined below. The relevant criteria in respect of the soundness challenges are listed specific to each policy as follows:

### Strategic Policies

#### Policy SP1 Growth Strategy

***Test of soundness:***

Policy SP1 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness

- 5.2 Belfast Harbour express general support for ambitious growth but would caution the reference in respect of a phased approach as set out in para 5.1.4. There is no need to phase the development of land and the policy framework does not actually suggest that there will be a phasing of, for example housing or employment land. The introduction of phasing would affect the Harbour's ability as a developer to respond quickly to market opportunity and change. As a consequence the phasing of land has the potential to affect the soundness of the plan vis a vis the ability to deliver the planned quantum of development during the plan period.

***Suggested revision to ensure soundness:***

- 5.3 Remove reference to phasing.

#### Policy SP8 Green and Blue Infrastructure Plan

***Test of soundness:***

Policy SP8 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness

- 5.4 Belfast Harbour delivers high quality public realm and has a key role in the maintenance and delivery of blue infrastructure in the Harbour area.
- 5.5 Examples of investment include the Belfast Harbour Waterfront Walk, a £1.2m investment in 1.2km of walkway and the Public Plaza at the Marriot Hotel comprising £2.5m investment of approximately 3,000 sq m (0.75acres) of public realm.
- 5.6 Future plans include the Maritime Mile Concept which Belfast Harbour are progressing in partnership with Titanic Foundation Ltd, Titanic Quarter Ltd and The Odyssey Trust Company. This is intended to be launched in the early part of 2019.
- 5.7 The Council's draft Green & Blue Infrastructure Plan was presented to Planning Committee in May 2018. Belfast Harbour will wish to engage in the development and delivery of this strand of Council activity, a key cross over to the Draft Plan Strategy.

***Suggested revision to ensure soundness:***

- 5.8 We suggest the Council incorporate their specific aspirations for Green and Blue infrastructure which have reached an advanced stage and should be integral to the plan strategy.

**Spatial Development Strategy**

**Policy SD3 City Centre**

***Test of soundness:***

Policy SD3 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness

- 5.9 Belfast Harbour lands fall within both the Waterfront District and Innovation District as identified by Figure 6.3.
- 5.10 Belfast Harbour supports the identification of the Waterfront District, although this area should extend further north into the Belfast Harbour Estate lands as these also accommodate waterfront city centre uses.
- 5.11 The Belfast Region City Deal refers to a Global Innovation Institute which includes the Catalyst Inc campus. Recognition of this cross reference should be reflected in the extent of the area identified as the Innovation District.
- 5.12 The plan should not unintentionally create restrictions or limiting perceptions of the purpose and character of City districts by labelling them as separate areas as illustrated in Figure 6.3.

***Suggested revision to ensure soundness***

- 5.13 We suggest the use of appropriate language to allow broad areas of focus which do not prevent 'non-conforming' uses which are otherwise acceptable in policy terms. The general thrust should be towards supporting investment across all parts of the City Centre, as per the policy framework in the draft Plan Strategy which, in the main, does not adopt a granular approach to different land uses - such as housing and offices - within discrete parts of the City Centre.

**Shaping a liveable place**

**Policy HOU6 Housing Mix**

***Test of soundness:***

Policy HOU6 is unsound as the policy fails the tests of CE1 and CE2 Coherence and Effectiveness

- 5.14 HOU 6 sets out that planning permission will be granted for new residential development on sites greater than 0.1 ha and /or containing 5 units or more where the proposed development provides a suitable mix of house types and sizes to promote choice and assist in meeting community needs.

- 5.15 Specific reference is made to providing smaller homes across all tenures to meet future household requirements. The policy clearly directs that the exact mix of house types and sizes will be negotiated with developers on a case by case basis.
- 5.16 The policy fails to satisfy the tests of Soundness in that:
- It has not been demonstrated that the policy is coherent with other proposed residential and design policies (soundness test CE1).
  - The policy is not founded on evidence which demonstrates how Council has tested the viability implications arising from the policy (soundness test CE2).
- 5.17 Council has published a number of evidence base documents in support of their proposed policies in the Draft Plan Strategy, including:
- Size and Type of Housing Needed (December 2017); and
  - Housing Market Analysis Update (September 2017).
- 5.18 It is important to note that within the Size and Type of Housing Need report it clearly states that a housing mix policy should not be applied on a site by site basis, as there needs to be flexibility to respond to the local market context, viability, demand and local market need (paragraph 3.3, page 15).
- 5.19 Notwithstanding the above, Belfast Harbour has concerns that information regarding housing need are set out in the Housing Needs Assessment prepared by the NIHE. This is specific to social rented housing and does not provide any justification for the type of houses which should be developed by private developers.
- 5.20 There are a number of ways that mixed tenure developments can be delivered. Housing Associations themselves could develop mixed tenure schemes or they may, depending on scale and risk want to work in partnership with private developers to deliver mixed tenure developments, such developers will want to deliver a housing product which is bespoke to that housing market area i.e. a product that home owners want to buy. There is no evidence within the plan documents which sets out how viability has been considered and justifies why the policy should be applied to all housing developments irrespective of tenure.
- Suggested revision to ensure soundness***
- 5.21 Belfast Harbour fully supports the intent behind the policy and acknowledges that the Strategic Planning Policy Statement (SPPS) advocates the need for a variety of house types and sizes and tenure to meet different needs in order to support balanced communities (page 70, SPPS). Belfast Harbour disagree however with Council's approach on this aspect and contend that the issue of housing type and size should only apply to affordable housing (as defined within the SPPS) and be considered as an integral part of a revised version of HOU 5.
- 5.22 Policy HOU 6 should be deleted.

## Policy HOU8 Specialist residential accommodation

### ***Test of soundness***

Policy HOU8 is unsound as the policy fails the test of CE2 and CE4 Coherence and Effectiveness

- 5.23 Belfast Harbour supports the provision of retirement and care-related facilities but the policy seeks to introduce a need test which is inappropriate within City Limits, particularly since the evidence base at Technical Supplement 2 for the Plan identifies a growing need for specialist housing which is likely to increase in Belfast as there is an ageing population and relatively high levels of poor health in parts of the city and a need for this type of accommodation.

### ***Suggested revision to ensure soundness***

- 5.24 Remove requirement for needs test.

## DES3 Tall Buildings

### ***Test of soundness***

Policy DES3 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness

- 5.25 The policy approach for tall buildings sets criteria for assessment of tall buildings within the Council area. On the City's waterfront taller buildings have been constructed, with others having secured planning permission. There continues to be opportunity for taller buildings on Belfast's Waterfront.
- 5.26 The policy defines tall buildings as those over 35m AOD, or taller and also refers to tall buildings as being '*those which are significantly higher than their surroundings*'.
- 5.27 Analysis undertaken to inform Council policy for tall buildings involved a study of city centre applications for taller buildings in the period of 2011 to the present day. It was concluded that taller buildings of above 9 or 10 storeys (approx. 35m) were more apparent and it was therefore concluded that 35m would be an appropriate threshold.
- 5.28 There is tension between the policy and its supporting technical supplements which suggest that further policies may be through forward at Local Plan Policies stage based on clusters.
- 5.29 The policy is also founded on analysis which considers some but not all extant planning permissions. The analysis should have considered all extant planning permissions in the city centre, see table 5.1 overleaf.

Development	Status	Height
Queen Street – Student Scheme	Complete	13 storeys
G5 Office Development	Approved	14 storeys
Odyssey, Queens Quay	Approved	Up to 28 storeys
City Quays	Approved	Up to 16 storeys
Sirocco Quays	Approved	Up to 20 storeys

**Table 5.1: Committed Schemes not considered**

- 5.30 Additionally, Figure 7.4 of the draft Plan Strategy fails to recognise a considerable amount of development which in its context would be considered a tall building however fall below the threshold of 35m e.g. City Quays hotel, City Quays 1 and multi storey car park.
- 5.31 The subjectivity around ‘significantly higher’ is carried through to the policy at (d) which introduces subjectivity in the use of the term ‘interesting’ *‘Contribute to a cluster or an interesting skyline when grouped together’*. Arguably this introduces uncertainty as to the circumstances in which policy will be applied.
- 5.32 VU.CITY was also used to test the threshold of 35mOD and identify clusters and emerging clusters. This additional analysis considers some but not all existing, committed and implemented schemes and therefore we also consider it unsound. Without considering these schemes, which are greater than 35mOD, we would disagree with the identification of the clusters and emerging clusters.
- 5.33 The policy text within the draft Plan Strategy makes no reference to any locational based assessment in the future, however, information detailed in technical supplement 6 - Urban Design & Built Heritage (page 14) states that within these broad clusters (as shown in Appendix 2) further detailed analysis will be carried out during the local policies stage of the LDP. Clarification is sought as to whether there is an intention to identify clusters or locations for tall buildings to be developed.
- 5.34 The reference that existing tall buildings within Belfast will not set a precedent for similar development on adjacent sites is unsound because it is an invitation to set aside an assessment of context and character, factors which are genuine and important material considerations in making a planning decision within the new policy framework.
- 5.35 Whilst we are supportive of criteria based policy there is insufficient evidence in the Sustainability Appraisal which tested reasonable tall building policies. We would ask the Council to formulate an evidence base to address this policy, and having done so reassess whether there is sufficient evidence to support the policy. As set out in Section 1 of the Historic England’s Tall Buildings Historic England Advice Note 4 “Towns and cities evolve, as do their skylines”. Identifying the role and contribution of tall building(s) as part of an overall vision of a place is important.

- 5.36 To accommodate the expected growth in population, including 31,000 additional people and other growth needs within the lifetime of the Plan, the city should allow for the appropriate construction of higher and denser buildings. The importance of going upwards has been brought to the fore in the south of Ireland with the publication of the draft guidelines by the Department of Housing, Planning and Local Government on building heights. The purpose of the guidelines is to 'Secure better and more compact forms of future development. This is for the benefit of our economy, our environment and most of all, our citizens. Our cities and our towns must grow upwards, not just outwards, if we are to meet the many challenges ahead' (our emphasis).
- 5.37 Allowing for taller buildings does not mean that Belfast will become a city dominated by skyscrapers or that the unique historical architectural character of Belfast will be lost. Rather, it will allow for projects that will meet the needs of the future whilst adding 'positively' to the city's skyline like many other cities in UK, Ireland and beyond.
- 5.38 The council needs to be flexible and to be able to respond to changing economic conditions.

***Suggested revision to ensure soundness***

- 5.39 Belfast Harbour supports the assessment on a case by case basis. In respect of the criteria based policy we have set out below our proposed modifications.

Criteria (a) We are not supportive of setting guideline heights and based on the analysis undertaken we recommend that the threshold of 35m AOD is revisited and the text 'those which are significantly higher than their surroundings' is dropped as there is no evidence base for this.

Criteria (c) Criteria is unsound as it doesn't read across other policies in the plan specifically those set out in the Built Heritage section.

Criteria (d) Replace 'Contribute to a cluster or an interesting skyline when grouped together' with 'Contribute to a cluster or create a focal point or beacon (a Point Block) which acts as a form of marker contributing to a positive skyline.' As drafted there is a conflict in respect of the clustering and grouping and assessing each application on its own merits. Individually, or in groups, tall buildings can affect the image and identity of the city. Para 3.4 of the Technical Supplement 06 states that '*Tall buildings are generally easily recognisable and act as key landmarks within a city's skyline either individually or as a cluster.*' (our emphasis)

Criteria (e) Replace 'Support locations of civic or visual importance including major transport nodes, civic spaces and areas of high employment' with 'Support locations of civic or visual importance including major transport nodes, civic spaces, areas of high employment, at arrival points into the city, waterfront and areas of regeneration including those identified as Development Opportunity Sites and masterplans' Consideration should be given to including criteria in DES3 that 'regard should be had to extant masterplans/frameworks or extant planning permissions whereby locations for taller buildings are identified or approved...'

Criteria (f) Add 'will bring significant regeneration benefits and contribute positively to place-making' similar to other UK cities it should be acknowledged that taller buildings

can act as catalysts for wider regeneration. Skylines of cities such as Manchester, Leeds, Liverpool and Birmingham act as markers and signposts of regeneration.

Criteria (g) Remove 'Existing tall buildings within Belfast will not set a policy precedent for similar development on adjacent sites.' This is unsound because it is an invitation to set aside an assessment of context and character, factors which are genuine and important material considerations in making a planning decision within the new policy framework. The PAC decision (ref: 2013/A0124) is of particular relevance.

5.40 In addition to the above, we would recommend that further consideration is given to the following:

- Promotion of well-designed and high architectural quality tall buildings.
- Ensure the merits of new taller 'iconic' buildings next to buildings of architectural and historic interest is considered. Two types of architecture (both the old and the new) sitting side by side can positively co-exist, as evidence by Titanic Belfast and the Titanic Hotel) and it is important to recognise the merits of new taller 'iconic' buildings next to buildings of architectural and historic interest.

5.41 Belfast Harbour disagree with the requirement for applications to be accompanied by a tall building design statement. The consideration of a tall building is normally set out in a Design and Access Statement, Concept Masterplan (if applicable), Townscape and Landscape Visual Impact Assessment and other technical assessments e.g. Daylight and Sunlight, Wind etc.

5.42 Finally, if the Council intends to introduce a locational based assessment for tall buildings that evidence to support this change is provided.

### **Creating a Vibrant Economy**

#### **Policy EC7 Higher education institutions**

5.43 Support broad approach

#### ***Test of soundness***

Policy EC7 is unsound as the policy fails the tests of CE2 Coherence and Effectiveness

5.44 Belfast Harbour note the reference to Belfast Metropolitan College's new Titanic Quarter campus which as the plan document sets out, has aided regeneration of the city waterfront area.

5.45 Catalyst Inc innovation hub is outlined as an innovation-led, high-growth; knowledge based businesses and provides links with the universities, colleges and research centres.

#### ***Suggested revision to ensure soundness***

5.46 Require consideration of broader policy heading as Catalyst Inc interpretation suggests wider innovation and economic impacts outside educational provisions.

### **Policy RET6 Temporary and Meanwhile uses**

#### ***Test of soundness***

Policy RET6 is unsound as the policy fails the tests of CE2 Coherence and Effectiveness

- 5.47 Policy criteria (e) & (f) are prescriptive in respect of vitality and viability impacts. If uses proposed are temporary/meanwhile then location/time should not be restrictive. Meanwhile uses should be considered on their own merits in the broader sense, e.g. to improve connectivity and safety of spaces.

#### ***Suggested revision to ensure soundness***

- 5.48 The policy should be amended to remove criteria (e) and (f) to ensure the dynamic essence of meanwhile uses are not diluted.

### **Policy CC1 Development opportunity sites**

#### ***Test of soundness***

Policy CC1 is unsound as the policy fails the tests of CE2 Coherence and Effectiveness

- 5.49 Maritime heritage is recognised as unique to the City. Greater Clarendon, City Quays, Sailortown are identified as areas of development opportunity. The process to prepare masterplan/urban design and landscaped frameworks for these areas must be inclusive.

- 5.50 City Quays falls within No. 1 Greater Clarendon (Sailortown) Masterplan.

#### ***Suggested revision to ensure soundness***

- 5.51 Reconsideration to be given to use of language as restrictive to open competitiveness and market conditions. Development opportunities are not solely restricted to those areas which are subject to masterplan proposals.

### **Building a smart connected and resilient place**

#### **Policy W1 Environmental impact of a waste management facility**

#### ***Test of soundness***

Policy W1 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness.

- 5.52 Policy criteria (j) requires that sites not be at risk from flooding and proposal should not cause or exacerbate flooding elsewhere. This is not disputed in respect of checks and balances to development, however given the extent of the flood plain in Belfast this precludes a large number of possible sites particularly in port appropriate locations where such infrastructure is best suited from a locational requirement.

#### ***Suggested revision to ensure soundness***

- 5.53 Policy should be amended to allow development in a port area as reflected in Policy W2 waste collection and treatment facilities.

## Policy TRAN 8 Car parking and servicing arrangements

### **Test of soundness**

Policy TRAN8 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness.

- 5.54 The policy states that proposals involving car parking in excess of the Department's published standards will only be permitted in exceptional circumstances.
- 5.55 Flexibility in the application of car parking standards which properly reflect the characteristics of the development, its location vis a vis public transport accessibility and pattern of use vis a vis public transport timing is required.
- 5.56 Constrained parking requirements places difficulty in securing tenants. Belfast Harbour has in the month of November 2018 been approached by a potential tenant seeking 20,000 sq ft office space with an associated provision of 150 car parking spaces. This is an operational requirement which is at odds with the existing parking standards that would be applicable at, for example Sydenham business Park. Industrial locations offer no residential patronage for public transport provision beyond 6pm – e.g Dargan Road making attraction of workers utilising public transport or alternative means of transport extremely challenging. Fringe and out of town parking requirement are the same, however public transport provision is not normally comparable in both locations. The traditional 9 to 5 working day is changing and there is a requirement to meet workers travel patterns in a growing timeframe across the day which is not ordinarily provided for by public transport.
- 5.57 The inability of the policy to cater for this flexibility makes the plan unsound because it indirectly affects the ability of developers to support the delivery of employment targets as prospective tenants may choose to invest in other competing locations outside of the City.

### **Suggested revisions to ensure soundness**

- 5.58 Incorporate a flexible approach to ensure operational requirements and investment opportunities can be catered for. This could involve consideration of a band of higher parking provision where public transport accessibility is limited beyond traditional core working hours.

## Promoting a green and active place

### Policy NH1 Protection of natural heritage resources

#### **Test of soundness**

Policy NH1 is unsound as the policy fails the tests of CE2 and CE4 Coherence and Effectiveness.

- 5.59 The policy guides on 'access and amenity' and requires an adequate development setback of a minimum of 5m from watercourses and waterbodies.

***Suggested revision to ensure soundness***

- 5.60 Amend policy provisions to exclude the requirement for a setback of 5m within port areas such as wharfs and quays.

## 6. Supportive Position

6.1 Belfast Harbour is supportive of the following policies and provide observations where relevant as follows:

### **Strategic Policies**

#### **Policy SP2 Sustainable development**

6.2 Support presumption in favour of Sustainable Development and its 3 pillars.

#### **Policy SP3 Improving health and wellbeing**

6.3 Support proposals for improving health and wellbeing.

#### **Policy SP4 Community cohesion and good relations**

6.4 Support broad principles of building community cohesion.

#### **Policy SP5 Positive placemaking**

6.5 Support principles of place making.

#### **Policy SP6 Environmental resilience**

6.6 Support mitigation and adaption policies.

#### **Policy SP7 Connectivity**

6.7 Support intensification of mixed use developments.

### **Spatial Development Strategy**

#### **Policy SD1 Settlement hierarchy**

6.8 Support the proposed hierarchy in line with the Regional Development Strategy.

#### **Policy SD2 Settlement areas**

6.9 Support the thematic policies and principle of retaining City Quays and Odyssey within the City Centre boundary.

### **Shaping a Liveable Place**

#### **Policy HOU2 Windfall Housing**

6.10 Support policies for housing on unzoned sites.

#### **Policy HOU3 Protection of existing residential accommodation**

6.11 Support policies for protection of existing residential stock, however the parking need not be so prescriptive as to hinder vibrant community services/provisions.

#### **Policy HOU7 Adaptable and accessible accommodation**

6.12 Support requirements for design to ensure adaptable and accessible accommodation, however already existing building control requirements.

#### **Policy HOU13 Short-term let accommodation**

6.13 Support broad criteria

**Policy DES1 Principles of urban design**

- 6.14 Support criteria listed and note reference that urban design should not lead to a rigid and formulaic approach.

**Policy DES2 Masterplanning approach for major development**

- 6.15 Support broad principles to BREEAM 'excellent', or similar standards in respect of office buildings.

- 6.16 Belfast Harbour note references to enhance the waterside character and setting of the River Lagan, including the improvement of existing and provision of new access points and new cross river connections where appropriate.

**Policy DES4 Advertising and signage**

- 6.17 Support policies for signage/advertisement.

**Policy RD1 New residential developments**

- 6.18 Support proposals and note (a) will not create conflict with neighbouring land uses.

**Policy RD2 Residential extensions and alterations**

- 6.19 Support broad proposals.

**Policy RD3 Conversion of sub-division of existing buildings for residential use**

- 6.20 Support broad proposals.

**Policy BH1 Listed buildings**

- 6.21 Support broad proposals.

**Policy BH4 Works to grounds affecting built heritage assets**

- 6.22 Support broad proposals.

**Policy BH5 Archaeology**

- 6.23 Support broad proposals.

**Policy HC1 Promoting healthy communities**

- 6.24 Support broad proposals.

**Creating a vibrant economy**

**Policy EC1 Delivering inclusive economic growth**

- 6.25 Support proposal for business sector growth and identified sectors included and recognise benefit to managed expansion, however proposals should not be viewed as exclusive, exhaustive or prescriptive.

**Policy EC3 Major employment and strategic employment locations**

- 6.26 Support broad proposals and recognise flexibility in the policy to allow for offices outside city centre locations.

**Policy EC4 Loss of zoned employment land**

- 6.27 Support broad approach.

**Policy EC5 Industry, storage and distribution areas**

6.28 Support broad approach.

**Policy RET1 Establishing a centre hierarchy**

6.29 Support broad approach and level of retail should be supportive of existing context to serve requirements of office occupiers, tourists and residents and commensurate in scale.

**Policy TLC1 Supporting tourism, leisure and cultural development**

6.30 Support broad approach however proposals should consider specific measures to fit with tourist attractions and boost waterfront/maritime opportunities.

**Policy TLC2 Existing tourism, leisure, cultural facilities and assets**

6.31 Support broad approach.

**Policy TLC3 Overnight visitor accommodation**

6.32 Support broad approach.

**Policy TLC4 Evening and night-time economy**

6.33 Support broad approach. Note Reference to Titanic Quarter and Odyssey which attract internationally-renowned culture, performers and productions that serve a wider regional catchment, and draw out of state visitors to Belfast.

**Building a smart connected and resilient place**

**Policy ITU 1 Telecommunications development**

6.34 Support broad approach.

**Policy ITU 2 Water and sewerage infrastructure**

6.35 Support broad approach.

**ITU 3 Electricity and gas infrastructure**

6.36 Support broad approach.

**ITU 4 Renewable energy development**

6.37 Support broad approach.

**W2 Waste collection and treatment facilities**

6.38 Support broad approach.

**W3 Waste disposal**

6.39 Support broad approach.

**W4 Land improvement**

6.40 Support broad approach.

**W5 Development in the vicinity of waste management facilities**

6.41 Support broad approach.

**TRAN 1 Active travel – walking and cycling**

6.42 Support broad approach.

- TRAN 2 Creating an accessible environment**  
6.43 Support broad approach.
- TRAN 3 Transport assessment**  
6.44 Support broad approach.
- TRAN 4 Travel plan**  
6.45 Support broad approach.
- TRAN 5 New transport schemes**  
6.46 In tandem review of transport corridor and DfI extant transport plan.
- TRAN 6 Access to public roads**  
6.47 Support broad approach.
- TRAN 7 Access to protected routes**  
6.48 Support broad approach.
- TRAN 10 Design of car parking**  
6.49 Support approach.
- TRAN 11 Provision of public and private car parks**  
6.50 Support approach.
- Policy ENV1 Environmental quality**  
6.51 Support approach.
- Policy ENV2 Mitigating environmental change**  
6.52 Approach accepted.
- Policy ENV3 Adapting to environmental change**  
6.53 Approach accepted.
- Policy ENV4 Flood Risk**  
6.54 Approach accepted and recognised ongoing Department for Infrastructure mitigation strategies across the City.
- Promoting a green and active place**
- Policy GB1 Green and blue infrastructure network**  
6.55 Support broad approach.
- Policy LC1 Landscape**  
6.56 Belfast Harbour is identified as a seascape character area within the NIEA Regional Seascape Character Assessment of NI (2014). This approach is accepted and supported.

## 7. Other observations

### **Supplementary Planning Guidance**

- 7.1 A large degree of technical detail is deferred to Supplementary Planning Guidance (SPG).
- 7.2 For example Policy DES3 suggests that 'in all cases applications for tall buildings will be expected to adhere to supplementary planning guidance'.
- 7.3 Additionally Appendix E of the plan sets out the range of proposed SPG's which total 30 in number across a broad range of themes.
- 7.4 That supplementary planning guidance is not yet available and there is a risk that strategic policies are being shaped with their ultimate deliverability dependent on this supplementary guidance.

## Appendix 1: Belfast City Council pro forma

## 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](http://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\*\*](mailto: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](http://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](mailto: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)

Sara

Last Name (Required)

Tinsley

**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:

## 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)

n/a

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)

Belfast Harbour

### Client contact details:

Title

Mr

First Name (Required)

Graeme

Last Name (Required)

Johnston

Address Line 1 (Required)

Harbour Office

Line 2

Corporation Square

Line 3

City

Belfast

Postcode (Required)

BT1 3AL

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

T [REDACTED]