

From: Judy Meharg [mailto:
Sent: 13 November 2018 09:41
To: Local Development Plan <LocalDevelopmentPlan@BelfastCity.gov.uk>
Subject: FW: Belfast Hills Partnership's response to the draft LDP

Please find our response attached. I would be grateful for an acknowledgement of its receipt.
Regards
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Belfast Hills Partnership's Response to the Belfast Development Plan 2020-35

We would firstly like to thank you for the opportunity to contribute to this process to date and acknowledge that much of our representations, made through the Green and Blue Infrastructure Group and our submission to the POP last year, have been acknowledged. We however wish to make a few comments under the Soundness Headings below:

Procedural Tests

P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made?

Reference Belfast Hill's Representation to POP in April 2017

1. BHP wish to reiterate that Brownfield Sites often have a high conservation value and therefore due assessment of this is required.
2. BHP wish to reiterate that development limit must be clear at all times and that the one set out in the BMAP should be retained as it is particularly sound.
3. BHP feels that the urban fringe is substantially under managed and that opportunities need to be found for new ways to manage and develop it for recreation, landscape and biodiversity.

Coherence and Effectiveness Tests

CE1 Does the plan set out a coherent strategy from which its policies and allocations logically flow? Where cross boundary issues are relevant is it in conflict with the plans of neighbouring councils?

1. BHP will need to await the development plans from ANBC and LCCC before making comment.

CE3 Are there clear mechanisms for implementation and monitoring?

1. Implementation- There is room for confusion where it says in the notes under Appendix D Natural Heritage Designations that "natural heritage sites of local importance that can be designated as part of the Development Plan process" We feel it should read will be used.

2. Monitoring- Appendix F ref 26- Natural Heritage Sites do not cover non designated sites. The elements in policy LC3 a-g lend themselves to be indicators for monitoring purposes as do some of the other landscape policies.