

Submitted to **Belfast LDP 2035 - Plan Strategy**

Submitted on **2018-11-15 15:04:13**

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:

Organisation

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?

No

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

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

[REDACTED]

Your Job Title:

[REDACTED]

Address Line 1:

[REDACTED]

Line 2:

Line 3:

City:

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:

The plan is sound in so far as we can tell. It is too early to have examined all the areas of 'soundness' the council are supposed to cover.

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

No file was uploaded

8b. Unsound

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

Relevant Section or Paragraph::

see attached

Policy (if relevant):

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:

C1 - Did the council take account of the Regional Development Strategy?, 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

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:

see attached

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?:

see attached

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

Objections to Belfast strategic Plan 2018.docx 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

Strategic Policies

The following document identifies strategic policies that have flaws or shortcomings. These may only transpire at the detailed stage of the plan, but it is important to raise them now, and also, if necessary, at the detailed stage.

The objections are as follows:

Object to the definition of established Residential Areas (App B). It is overly restrictive and compromises the future sustainable development of existing residential areas.

Object to Policy SP1 – the proposed growth strategy has prejudiced other ‘strategies’ in the plan that will prevent the targets being achieved. Contrary to RDS and SPPS.

Object to SP2- the proposals are overly prescriptive. For example, not promoting some of the ‘pillar’s over the others will hamper complex sites where one ‘pillar’ is glaringly supportive of sustainable development. In those circumstances the attempt to keep the ‘pillars’ lined up in some way is self defeating, and prejudicial to the objectives of the plan.

Object to SP 3- the proposed strategy is not robust enough to achieve the objectives of ‘improving health and well being’.

Object to SP5- SP5 may run foul of the contradictions and prescriptiveness of SP2.

A successful overarching strategy should be well streamlined and have no contradictions.

Object to SP6- putting public transport in the same context as walking and cycling to make local facilities accessible, needs to be revised. If local facilities are so distant that they require public transport, then this is an unfair cost burden in areas of high deprivation. The subject plan needs to become a problem solving document by identifying the deprived areas, and provided a full range of services (especially in housing estates) where the services are sparse. Good public transport is essential, but it is contrary to all sustainable publications if those living in areas of high deprivations have to use such transport to reach ‘everyday ‘ service centres.

Object to SP7- The connectivity in areas such as outer west Belfast is widely recognized as poor. The recent planning approval for Colin fails to satisfactorily address the connectivity problem. The plan needs to address this problem in a meaningful way.

Object to SP8- the green and blue infrastructures proposals are contrary to SPPS

Therefore, all of the above are contrary to the RDS and the SPPS.

Object to SD1- this policy is contrary to the SPPS. In order to achieve its growth objectives, this plan needs to revisit so-called open space areas (i.e. those not specifically zoned) in settlement areas of high housing demand. In such areas, there should be a presumption in favour of development.

Object to Policy SD2- all District centres should be revised in terms of their contribution to the area they are supposed to serve. Government surveys prove, for example, that Dairy Farm is a failed entity, and the recent planning permission beside it has not assisted. This is all contrary to the SPPS. Are the plan team planning to robustly test the role and function of existing district centres? This is clearly contrary to the SPPS and the RDS.

Object to Hou1 and HOU2- the downgrading of 'windfall' sites is dangerous as it is often the only form of development when there is a down turn. This policy is therefore also contrary to the RDS, SPPS , PPS 6 and PPS 8.

Object to Hou 5- opportunities need to be identified where, for example, social housing need coincides with 'non-specific' open space, there should be a presumption in favour of development. Not exploring this is contrary to the RDS and the SPPS.

No clear and effective 'problem solving' mechanism is in place to deal with challenges in Ret 1- Ret 6 and the CC1 proposals. How will the council know how to cope with emerging retail problems if this plan does not present a useful roadmap? What, for example, will it propose for the threat of one regional centre on another? - example- John Lewis at Sprucefield on Belfast and Lisburn? This lack of response is contrary to the RDS and the SPPS.

15/11/2018