

Submitted to **Belfast LDP 2035 - Plan Strategy**
Submitted on **2018-11-11 21:33:54**

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:

Organisation

Q4. What is your name?

Title:

Mr

Full Name:

Rajesh Rana

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:

Belfast Chamber of Trade & Commerce

Your Job Title:

President

Address Line 1:

Arthur House

Line 2:

41 Arthur Street

Line 3:

City:

Belfast

Postcode:

BT1 4GB

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::

5.1.4

Policy (if relevant):

SP1 Growth Strategy

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:

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

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:

Policy SP1 - Growth Strategy sets out ambitious targets for growth in homes, population, jobs and employment floorspace, which we support.

Para 5.1.4 states 'Land will be zoned for housing, employment uses and mixed-use sites within the Local Policies Plan to deliver the council's growth aspirations'.

However the LDP acknowledges that very little land outside of the current urban area could or should be zoned for development.

This LDP also acknowledges that within the urban area much land is unzoned 'whiteland' or 'brownfield land'.

It cannot, therefore, be said that the act of zoning land will deliver the growth aspirations as this land is already available for development.

Zoning land for particular land uses will have the opposite of the desired effect, as this lack of flexibility will restrict and slow down the development of vacant sites. If there are planning constraints on the development of urban lands these should be addressed as such, whether those be restrictions on density, height, access or issues such as contamination.

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?:

The LDP should set general guidance on height, density and access but not impose single land use zonings.

The LDP should address other issues that prevent or slow down development, including the slow nature of Development Control planning, and the need for economic support or stimuli required to bring forward development.

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

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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:

5.7.3

Policy (if relevant):

SP7 Connectivity

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

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:

Para 5.7.3 states 'Thematic policies support the integration of sustainable transport networks and land use to improve connectivity, reduce traffic volumes and promote sustainable patterns of mobility. This will require the intensification of mixed use development in accessible locations along existing and planned public transport corridors such as BRT routes. This will enable the development of a compact, walkable city ...'.

The number of and scale of development opportunities along public transport corridors is limited due to existing buildings and uses on most of the urban landscape. Any new development, even at a high density, will be relatively small in scale compared to the existing overall quantum of dwellings and employment floorspace, and other uses.

The policy is flawed in that it states 'This will require the intensification' when the intensification, of any significant level, is in fact impossible.

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?:

Policy SP7 Connectivity should be drafted to reflect the existing nature of the city's arterial routes and transport corridors. Many of the low density transport corridors are Conservation Areas and cannot be intensified.

Transport planning should be based on the actual nature of Belfast and not written as a generic policy that might apply to a new town elsewhere.

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::

5.7.1

Policy (if relevant):

SP7 Connectivity

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:

Para 5.7.1 states 'congestion on the key city corridors [leads] to increasing air pollution'.

Air pollution is a problem that must be tackled, but reducing congestion is only way of tackling air pollution.

The more logical approach to tackling air pollution is to move to cleaner technologies that can quickly make a significant change, compared to a long slow approach if only congestion is singled out as the cause.

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?:

The LDP should make reference to the role of moving to cleaner forms of motorised transport, such as the move away from diesel vehicles and the promotion of hybrid and full-electric vehicles. Considerable moves to provide electric charging points and electric vehicle parking should be included in the plan.

The move to electric vehicles is gathering pace and the LDP must reflect this as the primary way of reducing air pollution.

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

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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::

3.2 Local planning policy context

Policy (if relevant):

SP7 Connectivity

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:

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?

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:

The LDP does not list the Belfast City Council's Parking Strategy and Action Plan as pre-existing policy context.

BCC has approved this plan through Committee and it is therefore an adopted element of policy guidance.

The Parking Strategy and Action Plan has been through full consultation and it would be wrong to state that it is not relevant or out of date, as it has only recently been approved.

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?:

Belfast City Council's Parking Strategy and Action Plan should be incorporated into the LDP.

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

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Q18d. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fifth Submission

Q14e. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

6.3 City Centre

Policy (if relevant):

SD3 City Centre

Q15e. 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

Q16e. 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:

Policy SD3 - City Centre does not provide a useful Vision or set of policies for the City Core or City Centre areas.

The structure of the Spatial Development Strategy being split into and ordered along different use classes is not appropriate for a city centre that is, and should be, fundamentally mixed use.

The actual process of guiding the development and regeneration of the four defined areas of City Core, Innovation District, Mercantile District and Waterfront District is not discussed.

Q17e. 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?:

A Vision for the City Centre is required which will address the whole of the area and its parts holistically rather than split into separate policies for different land uses and access issues.

The process for masterplanning the four areas of City Core, Innovation District, Mercantile District and Waterfront District should be explicitly dealt with, and should involve business groups and community groups in partnership with statutory agencies.

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

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Q18e. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Sixth Submission

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

Relevant Section or Paragraph:

Policy HOU5 - Affordable Housing

Policy (if relevant):

HOU5 Affordable Housing

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 target of 20% of housing to be affordable on sites of more than 0.1Ha and / or containing more than 5 dwellings is unrealistic. This figure is too high and the threshold of 5 dwellings is far too low.

This will prohibit the development of sites for housing and work against the delivery of the required number of new homes by 2035.

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?:

The target for affordable housing should 10% on sites with 50 or more dwellings.

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

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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 - Seventh Submission

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

Relevant Section or Paragraph::

Policy HOU12 - Large scale purpose built managed student accommodation

Policy (if relevant):

HOU12 Large Scale Purpose Built Managed Student Accommodation (PBMSA)

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,
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:

The policy on large scale student accommodation is drafted as if purpose built student housing is a problem use.

The opposite is true - purpose build student housing is a solution to the problem of HMOs and anti-social behaviour by students in residential areas.

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?:

The policy should not prohibit development within existing residential areas, not least because the city centre is becoming residential itself in some areas.

The minimum size of 200 units has no bearing and should be removed.

The requirement for a statement of student housing need should be removed. This, like all forms of commercial development, must be at the risk of the developer and not determined by the planning authorities.

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

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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 - Eighth Submission

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

Relevant Section or Paragraph:

TRAN 9 - Parking within areas of parking restraint

Policy (if relevant):

TRAN9 Parking Standards with area of Parking Restraint

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,
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:

Within areas of parking restraint there should be no minimum no of parking spaces provided per dwelling.

Many people choosing to live and work in the city centre will not own a car, and providing one car parking space per dwelling is unnecessary.

The provision of this level of car parking will increase the cost of residential development, thereby impacting on the ability to provide affordable housing.

The requirement for parking will render some sites un-deliverable, thereby impacting on the delivery of the target of new housing by 2035.

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?:

There should be no requirement for on-site parking within areas of parking restraint.

Developers should be free to provide up to the proposed standard of one space per dwelling in areas of parking restraint. The standard should therefore be expressed as a maximum, not as a static standard.

Most developers will elect to provide up to one space per dwelling. It therefore very unlikely that issues with parking in existing residential areas will be a problem.

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?

Yes

8b. Unsound - Ninth Submission

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

Relevant Section or Paragraph:

Polict TRAN 11 - Provision of public and private car parks

Policy (if relevant):

TRAN11 Provision of Public and Private Car parks

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:

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

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 policy TRAN11 on Provision of public and private car parks contradicts the BCC Car Parking Strategy and Action Plan.

The BCC document clearly (and rightly) states that the current number of car parking spaces should be retained, and that new multi-storey car parks should be provided as surface car parks are redeveloped.

The high cost of car parking in the city centre is a real deterrent to people visiting city centre retailers and associated businesses, as retail parks in the suburbs offer free parking. Car parking is at a premium, due to a shortage of spaces in the high demand areas, leading to price increases.

The overwhelming presumption against long stay/commuter parking also damaging to the aspirations of providing 46,000 new jobs in the city. Even if the existing provision of commuter parking was retained this would require a very significant modal shift towards sustainable forms of transport to support the new jobs. Therefore to attempt to reduce the number of commuter parking spaces is highly unrealistic and will work against the stated target of 46,000 new jobs.

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?:

The LDP should make provision for new multi-storey car parking as surface car parks are redeveloped.

The current level of commuter parking should be retained, to cope with the additional 46,000 new workers in the city. This in itself will require a very significant modal shift.

'Development' car parking should be avoided and discouraged, in favour of flexible public spaces in multi-storey car parks. This form of parking is much more sustainable as the same space can be used by different users throughout the day and overnight, instead of being for the sole use of users of a development.

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:

Oral hearing