

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

Submitted on **2018-11-14 21:28:24**

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:

Individual

Q4. What is your name?

Title:

Total

Full Name:

Architecture

Q5. What is your telephone number?

Telephone number:

██████████

Q6. What is your email address?

Email:

████████████████████

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::

3. Individual

Q8. What is your address?

Address Line 1:

25 University Street

Line 2:

Line 3:

City:

Belfast

Postcode:

BT7 1FY

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::

Policy (if relevant):

HOU10 Housing Management Areas

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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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:

20% threshold is well below existing levels of such accommodation in the HMA;s

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?:

Account should be taken of existing buildings in the HMA's as to whether they are suitable for non HMO / Flats use - ie. terraced houses with no gardens, parking, private amenity space are not desirable for modern family needs.

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:

Policy (if relevant):

HOU4 Density of Residential Development

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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C1 - Did the council take account of the Regional Development Strategy?, 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?

Q16b. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

The densities are not high enough in outer Belfast

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?:

The density in outer Belfast should be increased

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

Yes

8b. Unsound - Third Submission

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

Relevant Section or Paragraph::

Policy (if relevant):

HOU5 Affordable Housing

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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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:

The proposal for 20% affordable housing to be provided by the developer will increase the cost of the 80% private housing for purchasers and will make property less affordable for all. The proposal may discourage development being carried out and exacerbate the shortfall in housing required.

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?:

Increase the threshold to only sites above 0.5HA

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

Yes

8b. Unsound - Fourth Submission

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

Relevant Section or Paragraph::

Policy (if relevant):

HOU6 Housing Mix

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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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:

Sites located in certain areas may only be more desirable to specific occupants due to the nearby amenities.

Q17d. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

What would make it sound?:

The housing mix should be the developer's choice.

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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:

Policy (if relevant):

HOU11 Intensive Housing Needs

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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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:

Not enough nodes

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?:

More nodes required - properties on HMA'a located on arterial routes to be designated as nodes.

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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 (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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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:

Not suitable for QUB students as minimal scope for such developments in close proximity to the University.

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?:

Identify suitable sites within acceptable walking distance to University. Increase the thresholds for HMOs & flat conversions in all HMA's.

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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 (if relevant):

HOU13 Short Term Let Accommodation

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:

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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:

Such accommodation is suited to HMA's due to the prevailing transience of tenancy.

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?:

Allow in HMA's without demonstration of need. Take into account tourist attractions such as museums, theatres, restaurants, bars - Such properties are suitable for short-term accommodation. Take into account the type of property and unsuitability for modern family requirements: ie small plots with no private amenity space, no parking.

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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