

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

Submitted on **2018-11-15 15:24:52**

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:

Mrs

Full Name:

Glenda Davies

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?

Yes

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:

Sandy Row Community Forum

Your Job Title:

Development Manager

Address Line 1:

63/75 Sandy Row

Line 2:

Line 3:

City:

Belfast

Postcode:

BT12 5ER

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::

Strategic Planning Policies

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:

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 consultation on the plan as it stand is narrowed to process only

At Sandy Row Community Forum we have concerns around a number of the key policies that are contained within the plan that we need to have a 'conversation with influence' alongside Council & other Stakeholders to ensure that they are of benefit to citizens & neighbourhoods particularly in relation to

Policy SP3 – Improving Health and Wellbeing

Policy SP4 – Community Cohesion and Good Relations

Policy SP5 – Positive Placemaking

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?:

We believe that there hasn't been enough relevant discussion with communities of interest & defined geographical communities as to how these Strategic Policies will be shaped

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:

Designated Areas

Policy (if relevant):

SD2 Settlement Areas

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:

The draft proposes eight "settlement areas" for planning purposes. Sandy Row is in the proposed Inner-City area and on the edge of the Rail Stations area. The detailed boundaries of the eight areas are not given – but will be in the next document (the Local Policies Plan with maps).

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?:

We believe that we have not been able to contribute as part of a co-design process to set out the parameters for this designation

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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::

Planning Policy Topics

Policy (if relevant):

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:

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:

Again it is the 'conversation with influence' around the outworkings of the policies and how they relate to supporting regeneration within the community

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?:

We as a community need to be involved in discussions with council how the housing policy relates to our community and what potential impacts may be

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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::

DESIGN

Policy (if relevant):

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:

CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

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:

Again this need significant discussion with effected community around the interpretation by developers of these policies

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?:

We believe that some of the current policy leaves communities at the mercy of de velopers and there is lack of capacity to challenge poor development proposals

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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:

Community Cohesion

Policy (if relevant):

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:

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:

Again we believe that there should be deeper conversations with communities on these policies that seek to develop community cohesion

EG meanwhile use policy should extend to where is any major development site and should be mandated of site owner

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?:

On this issue there has again been lack of conversations with communities that will be effected by these policies

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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:

Community Infrastructure

Policy (if relevant):

CI1 Community Infrastructure

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:

There is significant concern around councils ambitions for the use of developers contributions

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?:

We are keen that our proposals for developers contributions to be negotiated during any pre-application process and with the residents of the area to be most impacted

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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::

. Economic Development

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:

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:

We are primarily a residential area and it is feared in the community that priority is given to economic development in the large scale development sites that are adjacent to us

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?:

Sandy Row now finds itself in the heart of what is now being designated as the mercantile district of the city - we wish to be included in the discussions for the vision for this and how it fits with our sustainability plan for the local area

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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:

Oral hearing