

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

Submitted on **2018-10-08 16:50:14**

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:

Individual

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?

Yes

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:

[REDACTED]

Line 2:

[REDACTED]

Line 3:

City:

[REDACTED]

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

8b. Unsound

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

Relevant Section or Paragraph::

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:

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, 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?, 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:

Dear Sir / Madam.

Thank you for your notification in regard to the Belfast LDP Draft Plan

Following an examination of the material I wish to sustain my objection to the Belfast LDP as outlined in my previous correspondence of 07th February 2017, 02nd August 2017 and 13th August 2017.

The objection, as detailed before, is in summary that the LDP is contrary to the policies of Regional Development Strategy 2035 and Programme for Government specifically the aims of achieving balanced sub-regional growth and tackling regional imbalance and providing a '...strong, sustainable growth for the benefits of all parts of NI' and also that the issue of regional balance is also a political, religious and cultural issue of equality which again this plan does not address but would continue the inequality.

The document surreptitiously attempts to surmount the policies of the RDS and rewrite a narrative for a solo run policy for Belfast outside the RDS framework. The LDP is not the proper place to change the policies of the RDS and I hope that this can be examined at the Planning Appeals Commission hearing on the plan.

The desire for growth in Belfast to address perceived 'decline' in population so that it mirrors the growth of other UK cities is not the adopted regional strategy for NI. That Belfast was suburbanised in Bangor, Lisburn, Carryduff, Carrickfergus etc., in a policy direction that was contrary to the earlier strategies of relieving congestion and problems in Belfast via the 'new towns' of Craigavon, Antrim and Ballymena, is not an issue to be addressed in a solo run in a local plan but properly in a regional strategy.

I therefore repeat what I said before and which appears to have been ignored.

The element of the Regional Development Strategy that the LDO focuses on to the detriment of other elements is the recognition of Belfast as the 'regional economic driver'. This is only one element of the strategy and unfortunately it would appear that the Draft Belfast LDP appears to focus only on this and not to take account of the broader RDS aims.

These broader aims of the RDS are underpinned by the principle of achieving balanced sub regional growth. The importance of this is stressed as the 'critical issue' of 'tackling regional imbalance', specifically via the aims of achieving balanced sub-regional growth and providing a '...strong, sustainable growth for the benefits of all parts of NI'. This is in line with the NI Executive/Assembly Government policy and as outlined in the Programme for Government.

The Belfast LDP contains proposals for the creation of 46,000 jobs to grow the population by 66,000 to a total population of over 400,000 and to make provision for over 31,600 new homes. (At the average NI household size of 2.5 this would increase the population by 79,000.)

The RDS 2035 outlined Belfast as having an existing population of 268,000 (in a wider BMUA of over 575,000) and a stated aim of growing the city population to 300,000 by 2021. The initial RDS Housing Growth Figures for 'Belfast and Hinterland' (Diagram No; 34) indicated 60,800 units for this area that included Belfast City, the BMUA and a significantly wider sub region. The new Local Government Districts resulted in all these figures being revised using 2012 statistics to take account of Local Government Reform that was implemented in 2014. Belfast's population was increased as a result of its boundaries being expanded, by inclusion of some surrounding areas, to a population of 336,830 and revised Housing Growth Indicators issued for 13,700 units between 2012 and 2025 for the

new Belfast District that is the subject of the LDP.

The 31,600 new homes as proposed in the Belfast LDP would be wildly out of kilter with the RDS as would the population increase to over 400,000 even with the longer time frame to 2035. It is extraordinary that the initial report prepared for Belfast City Council by Turley's on this matter of housing, population and economic development does not refer to the implications of the RDS policy and that this approach now continues in spite of this issue being made aware in earlier objections.

The LDP does not indicate that this substantial increase will be achieved by a natural population increase or reversing the dispersal of the population of Belfast in to the greater BMUA that occurred in the last 50 years to Lisburn, Bangor, Newtownards, Carrickfergus etc. These areas, within the BMUA, also indicate further growth in their LDP's. As such the BMUA would continue to grow as a whole to the detriment of balance in NI by means of concentrating economic development, underpinned by substantial investment subsidies from the broader UK tax payer that are in a totally disproportionate manner used to sub vent development in Belfast.

The only conclusion is that the Belfast growth would be achieved by attracting more migrants from elsewhere, in particular the remainder of NI, who with little economic development in the west are forced to follow the pull of the subsidized magnet in Belfast.

This is not therefore a policy aimed at addressing regional imbalance but in a blinkered way looking only at the interest of Belfast. This is in a manner that would further increase the imbalance by continuing to suck the population, life and vitality out of other parts of NI whilst Belfast and the BMUA continues to overheat and congest from a UK government subsidy unevenly distributed. This has created the signs of recent affluence in Belfast in a subsidized bubble. There is no indication of plans or mention for high speed efficient public transport system to bring the workers from elsewhere in Ni in to the jobs in Belfast!

It is my view that the proposed Belfast LDP plan would continue this (im)balance.

In reality to achieve regional balance and accord with the RDS the Belfast LDP should, instead of multiplying the RDS figures, be promoting a scaling back of development in Belfast in recognition that development has been out of control and allowed contrary to the RDS strategy, supported by a subsidy, and as such a counterbalance should now be put in place to steer development elsewhere. This would retain Belfast's prime position but remove its dominant over powering inequitable use of government funding.

In spite of my objections the paper on the new plan issued does not in any form address my objections to the proposals on the basis of its compliance with the RDS and government policy of addressing regional imbalance. It is a serious failing of the plan that it does not address this issue.

The issue of regional balance is also a political, religious and cultural issue of equality which again this plan does not address but would continue the inequality.

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?:

comply with the RDS

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