



Our Ref: DB/DR/wh176H

14 November 2018

Mrs S Wylie
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Dear Suzanne

**RESPONSE TO BELFAST CITY COUNCIL'S LOCAL DEVELOPMENT PLAN
CONSULTATION ON THE DRAFT PLAN STRATEGY 2035**

I refer to the publication of your new Local Development Plan Draft Plan Strategy 2035 (hereinafter referred to as the dPS) and thank you for the opportunity to comment.

Development Plan Practice Note 7 says the Plan Strategy should set out 'an ambitious but realistic vision for the council area as well as the objectives and strategic policies required to deliver that vision' (para 1.3). In the same paragraph it is said that the Plan should 'also ensure that its objectives are integrated with, add value to and assist in the delivery of national, regional and local policies and strategies within Northern Ireland, the council area and other district councils'. The Plan Strategy should 'identify interdependencies and relationships between places both within and across administrative boundaries' (DPPN7, para 5.4). It should be 'both realistic and deliverable taking into account the resources available and any potential constraints which may arise during the plan period' (DPPN7, para 5.5).

A council must therefore have regard to relevant plans, policies and strategies, not only in its own district, but in the adjoining areas. The Regional Development Strategy 2035 (RDS), the Belfast Urban Area Plan (BUAP) and Lisburn Area Plan (LAP) amongst others are strategies and plans which both Councils share.

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 identify each neighbouring Council as a statutory 'consultation body'. It is acknowledged that the Metropolitan Area Spatial Working Group was established to foster co-operation and the sharing of information, but it is not evidenced in the dPS how the relationship with neighbouring councils in terms of the proposed growth strategy is considered. DPPN1 emphasises that 'Meaningful engagement [with consultation bodies] early in plan preparation is considered key to a council producing better informed and locally distinctive plans' (para 3.3).

We apply the approach to soundness in Development Plan Practice Note 06 Soundness (published by the Department for Infrastructure, version 2, May 2017). In addition Departmental guidance outlines the requirements for the submission of a representation, which states that any representation must demonstrate why the Development Plan Document (DPD) is not sound and/or justify how any proposed changes make the DPD more sound.

As a neighbouring Council, we consider fundamental elements of **Section 5.1 Growth Strategy: Policy SP1 Growth Strategy** in your dPS to be unsound for the following reasons:-

Consistency Test C1: Did the Council take account of the Regional Development Strategy?

- The Regional Development Strategy 2035 (RDS) places considerable emphasis on achieving sustainable development. In supporting strong, sustainable growth it states that this needs a co-ordinated approach to the

provision of services, jobs and infrastructure and a focus on co-operation between service providers. However rather than follow an approach which corresponds to the strategy across the Belfast Metropolitan Area, the dPS proposes a strategy of vastly greater growth in Belfast city, without any apparent consideration, let alone accord, with that strategy or the needs of its neighbouring areas.

- The RDS also sets out an Employment Land Evaluation Framework to help enable councils to identify a robust and defensible portfolio of both strategic and local employment sites. It states at SFG1 (pg 54) that economic growth should be at key locations *'throughout'* the BMUA to strengthen its role, including Major Employment Locations in the Belfast Harbour Area, West Lisburn/Blaris, Purdysburn and Global Point/Ballyhenry.
- The Executive Summary of the RDS states in relation to the Metropolitan area, the evidence is that over 50% of those who work in Belfast live outside it. No evidence has been presented of how the proposed growth strategy has had regard to this. Technical Supplement 3 of dPS is also silent on the wider distribution of key employment locations.
- To indicate that 46,000 jobs, 66,000 people and 31,600 new homes will be created without any degree of wider spatial context, is considered to be an unsound approach because there is lack of a sufficient evidence base to indicate how the infrastructure for delivering such growth could be met. This includes physical infrastructure (such as water and sewerage) and social/community infrastructure (such as schools and health care).
- In terms of the proposed housing growth the aim of the RDS is to maintain a balance of growth between the Belfast Metropolitan Urban Area and its hinterland and the rest of the region (Appendix B Housing, pg 99). For this purpose, Housing Growth Indicators were produced as a guide for preparing development plans to achieve this distribution for sustainable growth. It is noted that the draft Plan Strategy indicates that 31,660 new homes are needed over the lifetime of the Plan.
- This is clearly a departure from the HGI methodology issued by the Department for Infrastructure in both the RDS and the 2016 HGI. The published methodology which is bespoke to Belfast City Council area only

was undertaken independently of neighbouring councils. The Belfast Metropolitan Area operates as a single Housing Market Area (HMA) however there is no evidence to support or assess significant growth in one Council area might impact on housing growth in another of the same HMA.

- The absence of a Transport Plan to accompany the dPS has clear implications for neighbouring councils. It is recognised in SFG4 of the RDS that spatial planning and related infrastructure development is not only important for a successful economy but can help promote social inclusion by providing an affordable alternative to the private car. The RDS highlights that Belfast, as a gateway, should provide a high quality experience and be able to cope with the volume and variety of traffic passing through it, and that heavy reliance on the car and associated increased congestion levels in Belfast has had an adverse impact on journey times and emissions (pg 83).
- It is not possible or feasible to detach a transport plan for Belfast from the wider Belfast Metropolitan Area – one does not function without the other. Whilst the evidence refers to the Belfast Metropolitan Transport Plan (BMTP) as being the local transport plan (Technical Supplement 14 of dPS, para 2.26) it is some 14 years out of date and acknowledges that many of the schemes within it have not been implemented. It is likewise not evidenced how the projected growth can be facilitated in terms of infrastructure provision and what impact this would have on neighbouring Councils. The requirement for sustainable growth and less reliance on the car has clear impacts on the need for infrastructure beyond the administrative Belfast City Council area. Whilst acknowledging Belfast's ambition to increase its resident population and the reasons why it has not traditionally been able to grow its population base, this should not be to the detriment of the wider needs of neighbouring councils to facilitate balanced growth of their economy, infrastructure and services.
- The growth strategy for the protection of Belfast is not supported by the evidence base (Technical Supplement 4 to dPS, para 4.8) which indicates that Sprucefield (and Boucher Retail Park) act in competition with Belfast City Centre. The RDS recognises Sprucefield under SFG1 as a '*regional out-of-town shopping centre*' and emphasises that 'Sprucefield will continue to retain

its status as a regional out-of-town shopping centre' (para 3.41). It is not evidenced if any consideration is given to the balance of commercial growth as required by the RDS with regards to this regional status. The approach to growth appears to undermine the potential for retail growth in our Council area which is clearly against the thrust of SFG1 in the RDS. The RDS identifies that 'potential exists to grow the retail offer' in Lisburn city centre (para 3.36, see also para 3.41).

Consistency Test C3: Did the council take account of policy and guidance issued by the Department?

- Taking account of advice and guidance issued by Central Government and the HGI approach to housing growth across the region, the proposed growth strategy is not in accordance with published guidance for the reasons stated previously and should be read across with Test C1.
- The main Departmental policy and guidance is contained in the Strategic Planning Policy Statement (SPPS). The overall objective of the SPPS is to further sustainable development and identifies the three pillars of sustainable development in relation to our society; economy; and environment. It places an emphasis on 'balanced' growth in terms of housing and economic delivery. It states that it is similarly important to successfully integrate transport and land uses (pg 12). It is not evidenced how the principles of sustainable development are delivered through the draft Plan Strategy given that there has been no indication provided as to how the overall infrastructure requirements will be met.
- Development Plan Practice Note 7 'The Plan Strategy' states that a council should address the transport needs, problems and opportunities within the plan area to '***ensure appropriate consideration is given to transportation issues in the allocation of land for future development***' (pg 28). There has been no reference made to key strategic infrastructure that will assist in delivering the projected growth. The Transport Strategy, published by DfI will be key to assessing the impact of housing and employment growth across the Council area and neighbouring Councils. As a neighbouring Council, the effects of growth have not been fully assessed in light of the wider transport and sustainability implications.

- The Practice Note also states that a council may undertake a survey or review of existing economic development sites in order to justify its policy approach towards economic development. It is acknowledged that para 8.1.4 of the dPS states that *“Economic growth in the city will have spatial implications and the planning process is a key enabler for economic growth.”* In relation to the 46,000 jobs and 550,000 square metres floor space, in the absence of a full Employment Land Review there is not sufficient evidence to identify how it may impact in terms of the wider functional economic market area which is shared by both Councils. This is particularly relevant in the case of the Major Employment Locations identified in the RDS and draft BMAP.
- The dPS sets out very general development management policies but fails to include any assessment of what retail provision is required and where it should go. The retail and leisure capacity study is not referenced in the dPS and only mentioned briefly in Technical Supplement 4 (para 1.8, 3.3, 4.5). DPPN7 says that ‘A council must ensure that its town centre and retail strategy is based upon a robust and reliable evidence base to justify its policies and proposals for the plan area’ including a need or capacity assessment (para 20.4). It is not apparent how the evidence base has affected the policies.
- DPPN7 advises that ‘A council should also work collaboratively with neighbouring councils and relevant stakeholders to help ensure that its town centre and retailing strategy supports accessible and vibrant city and town centres within its council area and beyond’ (para 20.4). This has not happened during the preparation of your draft Plan Strategy.

Consistency Test 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?

- As a statutory consultee, we do not believe that due consideration has been given in regards to the relevant plans, policies and strategies relating to our council in relation to the overall growth strategy proposed, and how this will impact on the delivery of infrastructure and services.

- Development Plan Practice Note 7 'The Plan Strategy', states that the Plan Strategy should make it clear ***'how infrastructure which is needed to support a PS will be provided and ensuring that it is consistent with other relevant plans and strategies relating to adjoining areas'*** (pg 10)
- It is acknowledged at the outset that there is no legislation in Northern Ireland requiring councils to cooperate at a strategic level. However the soundness tests require consideration of regional strategy and the approaches of other plan areas. A plan cannot be sound if it disregards its impacts on, and the proposals in, neighbouring areas. The growth strategy proposes significant growth that will inevitably lead to impacts on the wider region and neighbouring councils. It is not apparent from the evidence available how the council have considered these wider impacts, in terms of the movement of goods, people and services (should be read across with Test C1).

Coherence and Effectiveness Test 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

- The 8 identified Strategic Policies SP1 to SP8 (page 31-42) appear to be broad objectives (or cross-cutting themes) rather than policies. Whilst they provide positive aspirations it is not clear how these relate to the latter operational/ topic based policies or how they will be implemented and monitored to comply with Coherence and effectiveness test CE3.
- The growth strategy raises a variety of cross-boundary issues relating to housing and employment growth that do not appear to have taken account of neighbouring councils and how that growth might affect or stifle them. In fact there is little reference to neighbouring council or cross-boundary issues, beyond the administrative boundary of Belfast City Council.
- The dPS approach to cross-boundary issues is to establish Belfast's aspirations and then propose to talk to neighbouring authorities about the consequences.

For example Technical Supplement 2: Housing says 'there are also cross boundary implications arising from the effective housing market area, which will be addressed through liaison with NIHE and neighbouring authorities' (para 4.05).

- The dPS does not contain a coherent retail strategy. Having set out the distinctive role of Belfast City Centre in para 8.2.4 along with a series of generic points, it then sets out generic policies to apply to planning applications.
- There is no apparent consideration of retailing outside the Belfast City Council area, whether Sprucefield or other shopping locations.

Coherence and Effectiveness Test CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

- Three growth scenarios are tested in the Sustainability Appraisal. The lowest is characterised as 'baseline demographic growth' yet fails to recognise that exceeds the scale of growth implied by historic trends and is a positive proposal.
- There is no evidence that the levels of housing construction required by the dPS over the plan period can be met. The new dPS average of 2,110 pa has only been exceeded on two occasions, just prior to the financial crisis (see Technical Supplement 2: Housing, para 4.05, figure 2). The average levels required by the dPS towards the end of the plan period have not previously been achieved and represent a considerable risk. The LDP Belfast Housing Growth Options Report (October 2016) modelled the preferred scenario at 1,750 dpa over 2014 to 2035 (para 10). Because of the lower levels of development which has occurred and is forecast between 2014 and 2019 (see Technical Supplement 2: Housing, para 4.04), the annual requirement has risen substantially from 2020.

- Similarly, the jobs and employment floorspace figures appear to be aspirational and based on developable floorspace potentially available (see Technical Supplement 3: Employment and Economy, para 3.2, 3.3) rather than what the market would be willing to bring forward or what likely demand would be.
- It is considered that the growth strategy does not appear realistic or appropriate in terms of the disproportionate spend that would be required for infrastructure in terms of this anticipated growth. For example, there is no assessment of the transport improvements required to meet the employment and housing requirements of SP1. Even if such requirements had been identified, the evidence base would need to have identified the practicality and impacts of such improvements and the likelihood of funding becoming available. The Transport Technical Supplement simply says at para 4.4:
 - "A coordinated approach is required between Dfl, the Council and neighbouring authorities across the sub-region to deliver the transportation vision for the city. There is also a duty to cooperate with neighbouring planning authorities to maximise the effectiveness of policies for strategic matters including transport which is being facilitated by the LDP Metropolitan Area Working Group."

However no meaningful coordination has taken place with Dfl and neighbouring authorities, including ourselves. Any 'transportation vision for the city' would have to be a shared vision with those authorities, yet none has been put forward.

- There is also no assessment of the social and environmental infrastructure required to satisfy the growth strategy, where and how it can be provided and how it will be funded.
- As referred to under CE1, it is not apparent how the retail strategy and policies are founded on an evidence base.

Policy HOU1

We have addressed the overall housing figure under Policy SP1 above. Further issues which arise on HOU1 are below.

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

- Delivery of the housing requirement relies on a substantial increase in dwelling completions as the plan period progresses. It begins at 1,100 to 1,300 dwellings per annum for the first five years (actually 1,240 dpa – calculated from figure 7.2) but rises to 2,700 to 2,900 (actually 2,846 dpa) in the last five years of the plan period. There is no evidence that such extremely high levels of home construction could be achieved, let alone maintained for the final five year period. There is also no assessment of the effect on the market in Belfast and the wider Belfast Metropolitan Area of such large numbers becoming available in a short period.
- The greater danger is that these figures will not be achieved and supply will fall significantly short. As explained under SP1, the excessive housing requirement for Belfast will reduce the plausible requirement and delivery in other council areas. The Plan Strategy pushes the achievement of almost half of the requirement to the last five years of the plan period. If that falls short, then there will be little time to try to make up the deficit in other authority areas. In that case, housing growth elsewhere will have been put off for an ultimately unachievable figure in Belfast.
- The Windfall figure appears to be very low since it applies to all land within the urban area which is not zoned for housing or a mixed use which includes housing and meets the modest requirements of Policy HOU2. In relation to Windfall, the Council should provide an accurate analysis of these figures over the lifetime of the Plan that considers sites with the potential for delivering more than 5 units.

Proposed changes that would make the Development Plan sound:

- As it stands, the growth strategy for Belfast ignores regional policy and the needs and requirements of neighbouring areas. It is also entirely aspirational, without any consideration of whether it can be achieved, or the costs and consequences of doing so.
- On the material available, the only sound approach would be one based on the RDS, with the 2016 Housing Growth Indicators, and taking those forward in a realistic manner. That requires a significant downward revision of the aims in policy SP1.
- The evidence which would be needed to begin to justify currently proposed growth strategy is indicated below.
- It is considered that in order to achieve soundness in relation to its growth strategy, Belfast City Council should consider and provide further evidence on how the significant growth will impact on neighbouring Councils. The Council should demonstrate with an evidence base how the projected growth in housing can achieve a neutral impact on neighbouring councils in terms of achieving sustainable growth as set out in the RDS and SPPS.
- It is considered that in order to achieve soundness in relation to loss of zoned employment land, Belfast City Council should identify which sites are no longer considered viable for employment, through undertaking a full Employment Land Review.
- More detailed consideration is required through a coordinated approach when considering how physical and social infrastructure will be provided to support the level of growth proposed in the growth strategy. In the absence of an Infrastructure Plan or integrated and up-to-date Transport Plan for Belfast City Council, it is considered that the evidence base falls short of providing justification for this growth and how this will impact on the wider Belfast Metropolitan area.
- It is considered that in order to achieve soundness in relation to integration with the Transport Plan, Belfast City Council should consider and provide further evidence on how transport infrastructure will be facilitated to deliver the anticipated growth in housing and jobs, so as to not negatively impact on

neighbouring councils. The importance of connectivity between Councils is therefore fundamental to how both councils operate and deliver their jobs and services and for the efficient movement of goods and people within and beyond council administrative boundaries.

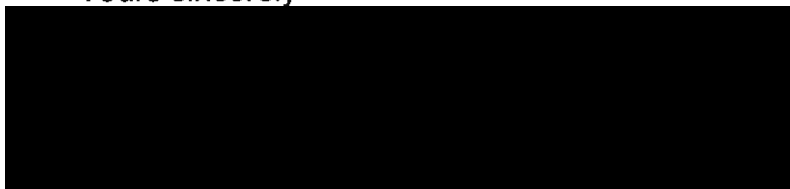
- Joint working by the councils in the Belfast Metropolitan Area and DfI towards agreed employment and housing targets with infrastructure and transport strategies that can achieve this.

Other comments:

- By way of noting, Lisburn has not been identified on the map on figure 5.1 within Belfast's role within the Spatial Framework, which is not reflective of the equivalent Spatial Framework in the RDS 2035. This omission, whilst perhaps not intentional, should be addressed.

The above represents our current views according to the position you have set out in your draft Plan Strategy. I am however very conscious and sensitive to the fact that this is a new process for us all and in bringing forward the draft Plan Strategy we are continuing to develop our learning. This point has been reflected in the Department's approach and guidance which has significantly evolved since the introduction of the legislation. Consequently I am prepared to keep our position under review in relation to your draft Plan Strategy in so far as it impacts our Council area.

Yours sincerely



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CHIEF EXECUTIVE

Cc Mr A Thatcher, Director of Planning & Building Control
Mr E Baker, Development Engagement Manager
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Mr D O'Kane, Principal Planning Officer