

Email received 18 April 2019 at 21:59

18th April 2019

Dear Local Development Plan staff,

Re my Counter Submission.

Having read through several of the LDP submissions I wish to make some general points, and some points about specific submissions.

First of all, it is perhaps quite revealing to consider which major political parties have Not submitted to the Local Development Plan.

This appears to include Alliance, SDLP, DUP and UUP.

The Local Development Plan has a whole chapter about HMOs and all the major parties are fully aware of the problems caused by HMOs in South Belfast.

[REDACTED]

[REDACTED]

[REDACTED]

It is also notable that University of Ulster has not submitted to LDP [REDACTED]

However QUB have responded to the Consultation, and it is most disappointing to see [REDACTED] that they have responded to LDP without even mentioning HMOs at all.

[REDACTED]

[REDACTED]

[REDACTED] promoting the £400,000 Rates Cap to be maintained [REDACTED] whereby the owners of the 7,000 most expensive Properties in NI, out of around 700,000, in other words the top 1% of home owners should be exempted from paying Rates, proportionally based on the valuation of their properties.

The result of this is that the richest people pay proportionately less Rates, and the poorest people pay proportionately more. This is of great concern.

[REDACTED]

It is also significant in my view that LPS have not submitted to LDP, [REDACTED]

In relation to other submissions, please see below.

- NIHE DPS-B-8J-D -

NIHE make absolutely No reference to HMOs. [REDACTED]

- Department of Communities DPS-B-8K-E

They make No reference to HMOs. This is very concerning given the serious issues of UnBalanced Communities like Holylands and Stranmillis that have HMO levels at over 3 times the maximum 30% levels, for Balanced Communities, and over 4 times, and up to 8 times the levels advocated elsewhere in Belfast by LDP (20% and 10%).

- Department of Infrastructure -

They make No mention of HMOs. Again this is of great concern.

- Equality Commission -

They make No mention of HMOs. This again is of great concern. Human Rights Commission doesn't appear to have made a submission, which is disappointing, given that HMOs are known to have caused levels of noise and anti social behaviour over periods of time that have been described as breaches of Human Rights. And some cases of Human Rights abuses caused by anti-social behaviour,

similar to that caused by occupants of HMOs have been the subject of Court cases, including the European Court of Human Rights.

- QUB Estates -

No mention of HMOs. See above.

- Shared City Partnership

No mention of HMOs

- Sinn Fein

Make No mention of HMOs in their submission, indicating the low level of importance they attach to this problem.

- Translink DPS-A-6S-X

Translink have made a very comprehensive submission, and whilst they have made no specific reference to HMOs, they have commented on Parking, and Residential Parking issues. Residents Parking was a major plank of BMAP 2006.

So far only one HMO area (College Park) has achieved Residents Parking since BMAP 2006.

I have copied extracts from the Translink submission below, which I feel are worthy of support, as Residents Parking is a key objective in relation to Balanced Community achievement.

See extracts from Translink submission below:

- Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality.

- LDPs should identify active travel networks and provide a range of infrastructure improvements to increase use of more sustainable modes. In particular, within urban areas, providing enhanced priority to pedestrians, cyclists and public transport and an appropriate level of parking provision which is properly managed, should assist in reducing the number of cars in our urban areas.

- 14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

● 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 an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would provide a robust evidence base to inform the policy on parking standards which is needed to support the Plan's strategic policies on Environmental resilience (SP6) and Connectivity (SP7).

● The policy fails to take account of the representation made by Translink to the Preferred Options Paper which stated that the principles are sound but any potential interventions would appear to be delayed pending further studies. The capacity of Belfast's road networks in the AM and PM peak periods is out of sync with car parking availability, particularly on the edge of the City Centre core. Pro-active provision of residential parking schemes, etc. need to be applied now in tandem with delivery of more Park & Ride capacity on rail and bus routes, otherwise network resilience will continue to worsen and affect bus timetables / schedules reducing their attractiveness as a viable alternative mode.

● The policy proposes outdated and unsustainable city centre parking policy which fails to take account of policy issued by the Department in the SPPS which advised (para 6.297, 4th bullet point) that the regional strategic objectives for transportation and land use planning are to;

'Promote parking policies that will assist in reducing reliance on the private car and help tackle growing congestion'.

As guided by the Department in Development Plan Practice Note 7, entitled 'The Plan Strategy', Section 3 of the Planning Act (Northern Ireland) 2011 sets out requirements for Councils in respect of the Local Development Plan (LDP) process where the Council is required to undertake a 'Survey of the District',....

● Councils should seek early engagement with DRD, or the relevant transport authority, and take account of their 'The New Approach to Regional Transportation' document and any subsequent transport plans.

● LDPs should identify active travel networks and provide a range of infrastructure improvements to increase use of more sustainable modes. In particular, within

urban areas, providing enhanced priority to pedestrians, cyclists and public transport and an appropriate level of parking provision which is properly managed, should assist in reducing the number of cars in our urban areas.

- In particular, within urban areas, providing enhanced priority to pedestrians, cyclists and public transport and an appropriate level of parking provision which is properly managed, should assist in reducing the number of cars in our urban areas."

- There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan which would provide a robust evidence base to inform a car parking strategy which would include future Park and Ride provision and which would support the commitment at para 9.4.3 where the Council recognises that a co-ordinated approach is required between the council and DFI as well as neighbouring authorities across the sub region to deliver the transportation vision'.

- What would make it sound?:

Preparation of a robust evidence base to include a survey of the transport system and traffic of the district and the preparation of a local transport study in order to determine the impact that the proposed car parking guidelines would have on the provision of public transport and on the highway network."

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I therefore support Translink submission to the Local Development Plan. And I am concerned about others, referred to above.

I am grateful for your attention to these matters, and this is my counter submission to the Local Development Plan.

Regards

Padraig Walsh

18th April 2019

## Email received 18 April 2019 at 23:12

Dear Local Development Plan,

Please see previous email below.

I wish also to refer to the submission by Aine Groogan.

See extracts below;

- 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:

Whilst I am fully supportive of the need to rebalance communities in Housing Management Areas (HMAs), the policy as outlined in HOU10 seems to be contradictory to the objective behind this policy. It states that planning permission would only be granted for HMOs and/or flats where they wouldn't cause the total number of HMOs/flats to exceed 20% in that area, whereas the acceptable level outside these HMAs are 10%. In order to ensure that planning policy supports the rebalancing of communities with HMAs, the acceptable level to approve any further HMOs/flats should be the same as non-HMA areas. Although density levels in HMAs are currently well above 20% in many instances, unless the target is to reduce it to 'normal' levels, i.e. less than 10%, then the planning policy will continue to enable over-development.

- 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 limit for which HMOs and/or flats should not be approved over in HMAs should be 10%, as it is outside of HMAs.

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I would suggest that the main focus should be to lower the 90% HMO levels in Stranmillis and Holylands etc to 30%.

A constructive step towards this would be Fair Rating and Residents Parking schemes.

Outside of current HMO hotspots all potential HMO areas should be allowed to have up to 30% HMO levels, to help rebalance Communities. Otherwise Stranmillis and Holylands are destined to remain at 90% HMO levels.

The main part of my counter submission is outlined in my preceding email, copied below.

I am grateful for your attention to these matters.

Regards

Padraig Walsh

**Email received 19 April 2019 at 19:47**

Dear [REDACTED]

Thank you for your reply.

Please note that in my correspondence I have referred to [REDACTED]  
[REDACTED]  
[REDACTED]

Please note that an official document I have found on the Web confirms that [REDACTED]  
election agent in 2017 was a [REDACTED], and not [REDACTED].

However [REDACTED] is also an informal election agent for [REDACTED], and he has  
personally canvassed for him in 2017, and has personally erected official election posters of [REDACTED]  
[REDACTED], also in 2017.

Please also note that [REDACTED] is widely officially recorded as living at [REDACTED]  
[REDACTED], a property valued at;

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**Capital Value Non-Exempt :**

£1,100,000.00

As of January 2005.

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED] (1% of all Rate payers), to be exempt from  
paying their fair share of Rates, by seeking to prolong the current Rates unfairness whereby the  
richest pay proportionately less Rates, whilst the poorer pay proportionately more, facilitated by the  
£400,000 cap.

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] This has no place in any future vision of South Belfast in the time period of 2019 to  
2035.

Also, non HMO properties with Planning Restrictions are often paying higher Rates than nearby  
highly profitable large HMOs with large extensions. [REDACTED]  
[REDACTED]

[REDACTED]

There are therefore, in my view huge obstacles for Local Development Plan to surmount in relation the problem of HMO conflicts of interest.

I believe that the Local Development Plan team should have a Zero tolerance to those [REDACTED] who demonstrate again and again that they are out only for themselves.

[REDACTED] vision of the future of South Belfast, [REDACTED] should not in my view be a future that Local Development Plan should embrace, in any circumstances.

I am grateful for your attention to these matters.

Regards

Padraig Walsh

Email received 20 April 2019 02:15

Dear [REDACTED]

Please see below

[Poll: Sinn Fein plans to increase rates for houses worth more than £400k - do you approve? - BelfastTelegraph.co.uk](#)



**Poll: Sinn Fein plans to increase rates for houses worth more than £400k - do you approve? - BelfastTelegraph.co.uk**

The SDLP has vowed to fight "tooth and nail" against a Sinn Fein proposal to increase rate bills for up to 7,000 homes.

In 2016 Mr. Boyle and Mr. Alasdair McDonnell, [REDACTED] [REDACTED] were referred to in the Belfast Telegraph as copied below.

"Councillor Boyle and South Belfast MP Dr Alasdair McDonnell are organising a public meeting next month to oppose the removal of the cap on domestic rates."

I contacted [REDACTED] and several other members of SDLP [REDACTED] [REDACTED] dozens of times over many years, about Unfair Rating in Stranmillis HMO hotspot, [REDACTED]

They never ever ever acknowledged my correspondences.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED] prevented purpose built Student Accommodation being built in Lennoxvale and elsewhere, whilst silent about 90%+ HMO levels in Stranmillis and elsewhere, [REDACTED]

I would gratefully request that Local Development Plan team help to tackle the problems [REDACTED] in Stranmillis, [REDACTED]

[REDACTED]

I believe this needs to be tackled as a matter of urgency. And all elected SDLP Councillors and those from other parties, should be made to declare the full extent of their HMO conflicts of interest, especially in relation to Local Development Plan, PACT etc, that deal with issues concerning Stranmillis, Holylands etc.

Please see my previous email in the response to your earlier email.

I am grateful for your attention to these matters.

Regards

Padraig Walsh