

Submitted to **Belfast LDP 2035 - Plan Strategy**
Submitted on **2018-11-14 10:50:02**

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:

Organisation

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::

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

[REDACTED]

Your Job Title:

[REDACTED]

Address Line 1:

[REDACTED]

Line 2:

[REDACTED]

Line 3:

City:

[REDACTED]

Postcode:



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::

7.1.26

Policy (if relevant):

HOU5 Affordable Housing

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:

C3 - Did the council take account of policy and guidance issued by the Department?

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:

DSD commissioned a workshop in 2015 operated by their consultants, Three Dragons, examining the viability of Developer input to social housing of 20%, or other viable sum.

The resultant Report of Conclusions was presented to the Social Development Committee in NI Parliament Buildings on 18th February 2016.

The outcome was that the market price within private development in NI, did not generally allow for a 20% level of developer input to social housing. This conclusion was reached after a year of interaction and close examination of the subject by DSD elected consultants from other UK regions.

Some exceptions were noted being high price points in North Down and South Belfast.

The report made clear that a blanket 20% figure was not viable.

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?:

A flexible figure of Social requirement should be considered. It must be considered on a case specific basis.

It is easy to examine the overall profitability of the industry as most participants are registered companies, where financial results are in the Public domain.

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?

No

9. Type of Procedure

Q18. Please indicate if you would like your representation to be dealt with by:

Written representations