

Submitted to **Belfast LDP 2035 - Plan Strategy**  
Submitted on **2018-11-15 16:35:12**

## 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:**

Individual

**Q4. What is your name?**

**Title:**

Profesor

**Full Name:**

Austin Smyth

**Q5. What is your telephone number?**

**Telephone number:**

**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:**

**Line 3:**

**City:**

**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

**8a. Sound**

**Q13. If you consider the Plan Strategy to be sound and wish to support the Plan Strategy, please set out your comments below:**

**Reasons for support:**

The strategy meets Although the tests of soundness are based upon three categories – procedural, consistency, coherence and effectiveness, there is a degree of overlap in terms of the criteria used for each test. The purpose of the IE will be to examine how the DPD meets each test and determine whether the DPD is sound as a whole.

5.3 Procedural Tests

P1

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

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**8b. Unsound**

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

**Relevant Section or Paragraph::**

The overlapping sections dealing with addressing the future vitality of the city centre

**Policy (if relevant):**

SD3 City Centre

**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:**

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, CE3 - There are clear mechanisms for implementation and monitoring, CE4 - It is reasonably flexible to enable it to deal with changing circumstances

**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:**

Tests of soundness are based upon three categories – procedural, consistency, coherence and effectiveness.

While the strategy does appear to fulfil adequately the required Procedural Tests and Consistency tests the evidence base and absence of presentation of an in-depth analysis of key matters means it does not offer a robust case that it fulfils all the Coherence and Effectiveness tests, including 'setting out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant' Nor does it demonstrate on the basis of robust evidence 'the strategy, policies and allocations are realistic and appropriate and are founded on a robust evidence base'. It lacks specification of 'clear mechanisms for implementation and monitoring' ; and it also fails to demonstrate it is 'reasonably flexible to enable it to deal with changing circumstances'.

**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?:**

Supporting evidence in relation to the points raised above can be provided should the independent examiner or other relevant officer request them, subject to diary and other work commitments.

**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:**

land use planning, housing design and supply, retail and employment location, and transport

**Policy (if relevant):**

**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:**

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, CE3 - There are clear mechanisms for implementation and monitoring, CE4 - It is reasonably flexible to enable it to deal with changing circumstances

**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 strategy while covering land use planning, housing design and supply, retail and employment location, as well as transport, does not bring together convincingly relevant policies, measures and mechanisms that are mutually supportive of the overall vision for the city in these matters. This undermines the likelihood that the vision for the city in these areas will be realised or the aims secured.

**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?:**

See previous comments about the robustness of the evidence base and application of sound analytical tools

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No file was uploaded

**Q18b. 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