

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

Submitted on **2018-11-15 11:24:06**

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:

Organisation

Q4. What is your name?

Title:

Chair

Full Name:

Tom Ekin

Q5. What is your telephone number?

Telephone number:

██████████

Q6. What is your email address?

Email:

████████████████████

Q7. Did you respond to the previous Preferred Options Paper consultation phase?

Unsure

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:

Project Hope

Your Job Title:

Chair

Address Line 1:

C/O Weavers Court

Line 2:

Linfield Rd

Line 3:

City:

Belfast

Postcode:
BT12 5GH

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::

5.7 Connectivity

Policy (if relevant):

SP7 Connectivity

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:

The Local Development Plan does not list the Belfast City Council's Parking Strategy and Action Plan as pre-existing policy context despite the Council having approved this plan through Committee and it is therefore an adopted element of policy guidance.

The Parking Strategy and Action Plan has been through full consultation and it would be wrong to state that it is not relevant or out of date, as it has only recently been approved.

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?:

Belfast City Council's Parking Strategy and Action Plan should be incorporated into the Local Development Plan

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:

5.5 Positive Place making

Policy (if relevant):

SP5 Positive Place Making

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:

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?

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:

Project Hope welcomes the development of the Transport Hub and believes it is a once in a lifetime exciting opportunity for the City and NI but we want to make sure that we get it right and we believe that Belfast City Council has the opportunity to ensure that there is a brighter vision for hope for the area around the Weavers Cross Transport Hub and beyond.

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?:

There needs to be agreement on suitable land used, open spaces, infrastructure and community facilities and a committed timetable for development and funding.

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Q18b. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Third Submission

Q14c. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

6.3 City Centre

Policy (if relevant):

SD3 City Centre

Q15c. 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:

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?

Q16c. 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:

Policy SD3 - City Centre does not provide a useful Vision or set of policies for the City Core or City Centre areas. The structure of the Spatial Development Strategy being split into and ordered along different use classes is not appropriate for a city centre that is, and should be, fundamentally mixed use.

The actual process of guiding the development and regeneration of the four defined areas of City Core, Innovation District, Mercantile District and Waterfront District is not discussed.

Q17c. 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 Vision for the City Centre is required which will address the whole of the area and its parts holistically rather than split into separate policies for different land uses and access issues.

The process for master planning the four areas of City Core, Innovation District, Mercantile District and Waterfront District should be explicitly dealt with and should involve business groups and community groups in partnership with statutory agencies.

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Q18c. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fourth Submission

Q14d. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

7.2 Master Planning

Policy (if relevant):

DES2 Master planning for Major Development

Q15d. 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:

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?

Q16d. 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:

We would like to see early phasing of development sites in order to bring forward opportunities for investment that will stimulate development and regeneration in a timely manner. In terms of the south west quarter of Belfast, we want to see the benefits of development from Grosvenor Road through Sandy Row and great Victoria Street incorporating key sites for regeneration.

Q17d. 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?:

We would like to see early phasing of development sites in order to bring forward opportunities for investment that will stimulate development and regeneration in a timely manner. In terms of the south west quarter of Belfast, we want to see the benefits of development from Grosvenor Road through Sandy Row and great Victoria Street incorporating key sites for regeneration.

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Q18d. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

Yes

8b. Unsound - Fifth Submission

Q14e. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

9.1 Building a Smart resilient and connected place

Policy (if relevant):

TRAN11 Provision of Public and Private Car parks

Q15e. 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:

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?

Q16e. 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 policy TRAN 11 on Provision of public and private car parks contradicts the Belfast City Council's Car Parking Strategy and Action Plan. The Belfast City Council document clearly (and rightly) states that the current number of car parking spaces should be retained, and that new multi-storey car parks should be provided as surface car parks are redeveloped.

The high cost of car parking in the city centre is a real deterrent to the retail and associated economy, as retail parks in the suburbs offer free parking. Car parking is at a premium, due to a shortage of spaces in the high demand areas, leading to price increases.

The community close to the Transport Hub are also hugely impacted by car parking in the area and would like to see a Residents & Business Parking Scheme in operation.

The overwhelming presumption against long stay/commuter parking also damaging to the aspirations of providing 46,000 new jobs in the city. Even if the existing provision of commuter parking was retained this would require a very significant modal shift towards sustainable forms of transport to support the new jobs. Therefore to attempt to reduce the number of commuter parking spaces is highly unrealistic and will work against the stated target of 46,000 new jobs.

Q17e. 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 Local Development Plan should make provision for new multi-storey car parking as surface car parks are redeveloped. The current level of commuter parking should be retained, to cope with the additional 46,000 new workers in the city. This in itself will require a very significant modal shift.

'Development' car parking should be avoided and discouraged, in favour of flexible public spaces in multi-storey car parks. This form of parking is much more sustainable as the same space can be used by different users throughout the day and overnight, instead of being for the sole use of users of a development.

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Q18e. 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