



# Belfast Local Development Plan

Draft Plan Strategy – Counter-representations report  
August 2019



# Contents

<b>1. Introduction .....</b>	<b>1</b>
1.1 Purpose of this report .....	2
1.2 The counter-representation process .....	2
<b>2. Overview of responses .....</b>	<b>3</b>
2.1 Summary of responses received .....	4
2.2 Summary of key issues raised .....	4

## Appendices

<b>Appendix A: Respondents.....</b>	<b>6</b>
-------------------------------------	----------



# Introduction



## Introduction

### 1.1 Purpose of this report

- 1.1.1 This report summarises the responses received in relation to the Belfast Local Development Plan (LDP) draft Plan Strategy counter representations stage, in accordance with the Statement of Community Involvement (SCI)<sup>1</sup> and the Planning (Local Development Plan) Regulations (NI) 2015. It provides a summary of the key issues raised through the consultation process and should be read alongside the more detailed report on the Draft Plan Strategy consultation process.
- 1.1.2 This report, alongside a full copy of all the representations submitted as part of the counter representation consultation, will form part of the assessment of the soundness of the Plan Strategy.

### 1.2 The counter-representation process

- 1.2.1. The draft Plan Strategy and supporting evidence were published on 23 August 2018, with the formal consultation period running until 15 November 2018. A copy of all of the representations received during the public consultation were then published on 1 March 2019, with an opportunity to submit counter representations provided until 12noon on 26 April 2019.
- 1.2.2. In accordance with Regulation 18 of the LDP Regulations, counter-representations could only be made on any representation on a site-specific policy. A "site specific policy" means a policy in a development plan document which identifies a site for a particular use or development. A "site specific policy representation" means any representation which seeks to change a development plan document by:
- a)** Adding a site specific policy to the development plan document; or
  - b)** Altering or deleting any site specific policy in the development plan document.
- 1.2.3. Counter-representations were therefore required to relate to a site-specific policy representation and should not propose any change to the draft Plan Strategy document. This is also set out in paragraph 8.0 of the Department's Development Plan Practice Note 9.

---

<sup>1</sup> The Statement of Community Involvement (SCI) was published in March 2018 and is available from: <http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/statement-community-involvement.aspx>



# Overview of Responses



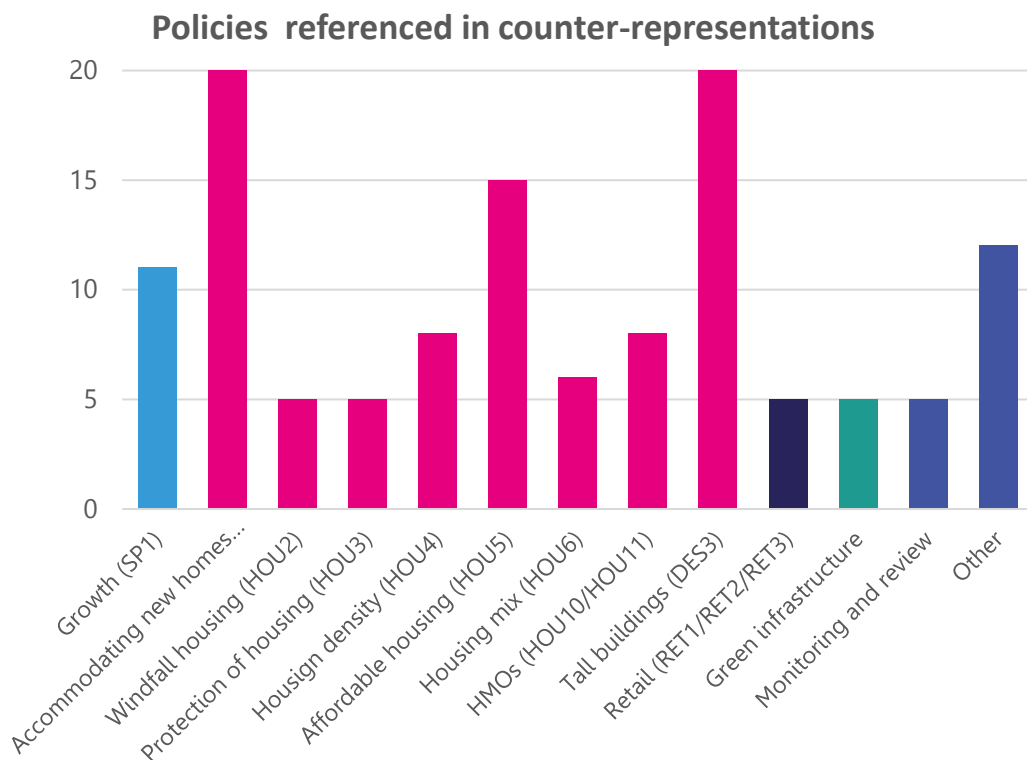
## Overview of responses

### 2.1 Summary of responses received

- 2.1.1 A total of 63 counter-representations were received from 14 stakeholders, all but one of which had previously made representations to the original draft Plan Strategy consultation. These stakeholders are listed at Appendix A.
- 2.1.2 Although 63 separate counter-representations were submitted, these related to just 13 specific policies, although a number of counter-representations also made more general comments without citing a specific relevant policy. The counter-representations referred to 26 of the original representations.
- 2.1.3 5 of the counter-representations, all from the same organisation, were submitted via our online response form (Citizen Space) and the remaining 58 electronically via email, three of which provided duplicates via hard copy also.

### 2.2 Summary of key issues raised

- 2.2.1 As noted above, the 63 counter representations submitted related to just 13 specific policies within the draft Plan Strategy.



- 2.2.2 These were by and large the same policies that received the most original representations, including the growth strategy (Policy SP1) and housing growth (Policy HOU1), other housing policies, including those relating to density (Policy HOU4), affordable housing (Policy HOU5) and housing mix (HOU6). A large number



of counter representations also related to the tall building policy (Policy DES3). A small number of counter representations related to policies within the retail section, green infrastructure section and the monitoring and review section, as well as a range of broader comments on a range of issues including residential parking issues and cross-boundary engagement with neighbouring Councils.

- 2.2.3 However, it is the Council's view that none of the representations submitted as part of the counter representation consultation can be considered to meet the relevant definition set out within Regulation 18 of the LDP Regulations. That is, none of the responses can be considered to relate to a "site specific policy representation", instead providing either general comments on the draft Plan Strategy or representations submitted in relation to non-site-specific policies.
- 2.2.4 Nevertheless, a full copy of all the representations submitted as part of the counter representation consultation, alongside this summary report, will form part of the submission of the Plan Strategy to be considered as appropriate as part of the future independent examination.

## **Appendix A: Respondents**

The following organisations / individuals provided a counter representation to the draft Plan Strategy:

- Alfred Street Properties
- Belfast Harbour
- Belfast Harbour Commissioners and Titanic Quarter
- Belfast Metropolitan Residents Group<sup>2</sup>
- Benmore Group and Benmore Octopus Healthcare Developments (HK) Ltd
- Clanmil Housing Association
- Corbo Ltd
- Kilmona Holdings Limited
- Lacuna Developments
- Lagan Homes
- Northern Ireland Federation of Housing Associations
- Osborne & Co
- Pdraig Walsh

In addition to those listed above, 1 respondent asked to remain anonymous.

---

<sup>2</sup> *Belfast Metropolitan Residents Group are the only organisation not to have submitted a response to the draft Plan Strategy consultation.*