

[REDACTED]

Our Reference

Sent by email to:

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localdevelopmentplan@
belfastcity.gov.uk

15 November 2018

Mr D O’Kane
Belfast City Council
Planning Department
Development Plan Team
Cecil Ward Building
4-10 Linenhall Street
Belfast
BT2 8BP

DPS-B-8E-8

Dear Mr O’Kane,

Belfast Development Plan
Representation

I am making this representation on behalf of [REDACTED] and refer to the draft Belfast LDP 2015 – Plan Strategy and welcome the opportunity to provide comments. My comments relate to the housing allocation and policies proposed in the draft Plan Strategy and highlight the extent to which these do not meet the requirements of soundness set out in Development Plan Practice Note 6.

Point CE2 of Development Plan Practice Note 6 requires that the strategy, policies and allocations are realistic and appropriate. The housing allocations proposed in policy HOU1 of the draft LDP do not meet this requirement from several perspectives.

There is a mismatch between the areas shown for the location of additional dwellings and the type of accommodation which can be realistically provided at these locations, and the mix of accommodation required to meet the full range of housing needs and demands.

Para. 3.11 of Technical Supplement 1: Population Profile and Growth states that around one third of additional households forming in Belfast are expected to contain a single resident, with a similar proportion containing two adults without children. By subtraction, this leaves one third of additional households with children. The statement in para. 3.11 that 89% of additional households are not expected to have children is at odds with this figure - this discrepancy is not explained in the document.

Para. 3.11 recognises the need for family sized housing and that meeting this need will require a balanced profile of housing development. This is also acknowledged in the objectives on page 26 of the LDP which include the following:

‘To address current and future residential needs through ensuring the supply of suitable land to meet future requirements for new socially inclusive residential development where there is an appropriate type, size density, tenure and mix to suit all needs of the population.’

Para. 7.1.5 includes the policy aim to ‘manage the supply of housing, including affordable housing, in response to changing housing need.’

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Para 7.1.44, under Policy HOU6, quotes independent research as suggesting that over the plan period Belfast requires:

- Type – 30% will require flats/apartments with 70% preferring houses; and
- Size – 40% would require properties with 1 or 2 bedrooms, the residual 60% requiring at least 3 bedrooms.

This is a significant requirement for family housing, amounting to a significant proportion of the overall housing allocation. However, the LDP does not demonstrate in the housing allocation proposed that appropriate provision has been made for family housing. The allocations made for the City Centre and Harbour Estate will inevitably be predominantly apartment development, unsuitable for families. In addition, the emphasis in the remainder of the City is on brownfield development, and the range of densities proposed in policy HOU4 indicate an emphasis on high density development rather than family accommodation of larger houses with garden space for children's play.

The LDP also does not demonstrate that the needs of communities across Belfast will be met. The sectarian geography of Belfast regrettably means that available lands in one area of the City cannot necessarily provide acceptable residential locations for home-buyers from other parts of the City.

Fig. 7.1 on page 61 of the LDP shows the location of existing housing site of over 50 units. There is a clear shortage of available sites in the south and east of Belfast which the proposed housing allocations do not address. These needs have traditionally been met by housing allocations in Dundonald, Newtownbreda and Lisburn, all of which lie in Lisburn and Castlereagh District. There is no evidence presented of liaison with Lisburn and Castlereagh Council on this matter – rather the LDP deals only with the comparison of overall need and capacity. Similarly, there is no specific consideration given to the needs of other sectors of the City. Given the differences in housing need and land availability across the City, this is a significant omission in the strategy.

The LDP has not therefore demonstrated that the proposed land allocations will meet:

- the required mix of accommodation needed to fulfil the range of housing needs, particularly for family accommodation; and
- the specific needs of different parts of the City.

This leads to questioning of the statement in para 4.11 of Technical Supplement 2: Housing, that 'it is considered more appropriate to adopt a stance in favour of all new housing being delivered on previously developed/brownfield land.' The RDS requirement is for 60% of new housing to be located on appropriate brownfield sites. There is therefore no policy imperative for the 100% figure proposed in the LDP and this can only be justified if the allocations proposed can be guaranteed to meet all elements of future housing need. As discussed, this has not been demonstrated in the LDP to be the case.

These considerations point to the need for greater flexibility in housing land allocations. This is referred to in para.4.17 of Technical Supplement 2: Housing, which identifies a number of options for meeting residual housing need if there is insufficient land to meet the Council's housing development needs. The conclusions above indicate that these options should have been explored, particularly in two areas which have a significant potential in helping to meet the full range of the City's needs:

- the redevelopment of existing industrial lands – Fig.8.1 under policy EC2 indicates employment sites and indicative yield. This policy is unclear as to what area the figures used refer to. The heading of policy EC2 refers to 550,000 sq.m. of gross developable land; the table in the policy heading refers to employment floorspace. This difference needs to be clarified.

For the purposes of this comment, the significant point is that there is a substantial oversupply of employment space, and the capacity therefore to use some of the existing land capacity for other more pressing uses.

Para. 4.17 of Technical Supplement 2 identifies the potential to review employment zoned land but does not identify the option to redevelop existing employment land for other uses or mixed-use development. While previous employment uses may have focused on industries which may not always have been good neighbours, modern employment uses are of a business character, generally compatible with residential development and which are favoured by the LDP under policy EC1.

The LDP contains a policy for the retention in employment use of zoned employment land. This does not provide flexibility to allow redevelopment for residential or mixed-use development. Further the LDP is silent on the redevelopment for other uses including residential, of existing employment sites which are not zoned. These provisions would provide flexibility in housing allocations and should be incorporated in the LDP strategy.

- Greenfield allocations – Previous plans for the BUA or the BMA have provided a balanced approach to meeting housing need, an emphasis on building within the urban area in order to foster urban regeneration, together with greenfield allocations. While the former element has largely focused on Belfast, the latter has been accommodated by greenfield provision of family housing in the Districts at the edges of the Metropolitan Area.

The preparation of separate plans for the individual Districts of the urban area removes this overall approach to housing allocations. The result has the potential to be a Belfast LDP focused on brownfield development, as is now proposed; and plans for the outer Districts where housing allocations may include a higher proportion of greenfield land without the counterbalancing factor of the brownfield potential of Belfast. This greenfield capacity if realised, is likely to be more attractive to volume housing developers than small sites within Belfast and may therefore undermine the strategy of the Belfast LDP to double historic average house building rates in the City. In the absence of a plan for the overall Belfast Metropolitan Area to deal with this potential issue, there is no evidence in the LDP of any liaison with other Districts to discuss the overall need for greenfield lands for family housing and to secure a managed approach to provision to meet Belfast's needs.

Reference was made above to the need to double housing output in Belfast above average historic levels. Fig.7.2 of the LDP and Figs.5 and 8 of Technical Supplement 2 indicate the projected building rates required. Fig.5 indicates that build rates between 2014 and 2019 (estimated) fell short of the HGI in the RDS by 2194 dwellings, and of the projected requirement in the LDP by 6442 dwellings.

The plan strategy does not demonstrate that the required build rates are credible in the light of this past performance. Para. 7.1.10 of the LDP on page 62 states that 'Fig. 7.2 illustrates how the housing supply within policy HOU1 can be delivered over the plan period.....' this is not the case. What the figure illustrates is the build rates which are needed in order to meet the strategy, not how the required performance can be delivered. As noted above, delivery may depend as much on the content of LDPs for the outer Districts if not more than on any measures to raise performance in Belfast.

I, [REDACTED], would be grateful if you would accept this as a formal representation to the draft Plan Strategy and we would welcome the opportunity to present these views to the Public Examination into the Strategy in due course.

Yours sincerely

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