



**Belfast  
City Council**

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**Our Ref: 20221115DraftDPPN11**

(Please quote at all times)

Mr Alistair Beggs  
Deputy Director, Strategic Planning Directorate  
Department for Infrastructure  
Clarence Court  
10-18 Adelaide Street  
BELFAST BT2 8GB  
By email:

Dear Susan,

### **Draft DPPN 11 – Adoption of Development Plan Document – Comments of Belfast City Council**

I refer to your recent circulation (by your email dated 5<sup>th</sup> October 2022) of the draft Development Plan Practice Note (DPPN)11, which relates to the receipt of the independent examination report and the adoption of local development plan documents. The City Council welcomes the opportunity to provide comments on the revised draft guidance. The draft DPPN11 has been considered by the Council's Planning Committee and the following are the comments of the Council.

The Council acknowledges that the Department has taken into account several of the comments made in our correspondence of September 2021, particularly in relation to timescales for the Department's consideration of the PAC report and the provision to allow for fact checking in advance of the issuing of the direction. However, for the review and fact checking to be effective it appears counter intuitive for this to be carried towards the end of the 12-week period in which the Department has access to the PAC report, as this leaves little time for any issues to be highlighted and increases the risk that errors could be translated into any Direction.

The flexible approach to the timeframe for adoption post direction is also helpful. However, we would have some concerns that the example given in the document to allow for such things as the publication of Supplementary Planning Guidance (SPG) is confusing in this context, given that it is non statutory and would not normally be a precursor to adopting the plan.

The DPPN also cites that it is a matter for the planning authority to determine the weight to be given to the draft DPD or individual policies once the department issues a direction to the Council. This appears to contradict paragraph 1.11 of the Strategic Planning Policy Statement (SPPS) which states that existing (DfI) policy will cease to have effect only after the Plan Strategy is adopted. Although this might be a transitory issue it could have significant consequences for any interim period, particularly given the Council's current experience with delay in the adoption of its plan.

As highlighted in the previous correspondence the DPPN is limited in recognition or consideration of the other assessments that form part of the LDP process, such as the Sustainability Appraisal/ Strategic Environmental Assessment, Habitats Regulations Assessment or Equality Impact Assessment, which may require to be reviewed in the light of any DfI direction.

I trust you find this helpful.

Yours sincerely

Kate Bentley  
Director of Planning and Building Control