

**BELFAST CITY COUNCIL**

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**SUBMISSION**

**RE**

**LOCAL GOVERNMENT BOUNDARIES REVIEW IN  
NORTHERN IRELAND**

**PROVISIONAL RECOMMENDATIONS**

**(September 2021)**

## **Introduction**

This submission in response to the Local Government Boundary Commissioner's Provisional Recommendations 2021-22 is made on behalf of Belfast City Council.

The Commissioner will wish to note that, as with previous decisions in relation to boundaries review in Northern Ireland, the Council have advised individual parties to submit their own responses to the recommendations, particularly in relation to proposed changes to ward boundaries.

The following Council response can be categorised into:

- (i) General Points pertaining to broad issues concerning the Commission's approach to the identification of boundaries; and
- (ii) Specific Points in relation to Belfast.

### **(i) General Points re Boundary Delimitation**

A number of General Points on the approach to boundary delimitation can be distilled under the headings of (a) statutory parameters and (b) additional factors.

#### Statutory parameters

Please note from the outset that we understand how the Commission has arrived at its recommendations, having regard to the statutory parameters it has to work within. In this respect, we understand that Belfast has to be equipped with a certain number of wards that falls within the range of 55 to 65. We appreciate that the Commission, in the desire to appear even-handed, would have a tendency to advocate the medium of this range, namely the 60 ward figure.

We also accept that a degree of interpretation has to be made in respect of what constitutes readily identifiable boundaries, in terms of the importance attached to physical features on the ground – whether they be man-made (roads, railway lines, etc.) or natural features (rivers, lakes or uplands).

To this end, we recognise that the existing urban footprint and Development Plans, such as the BUAP and Draft BMAP, can act as reference points for deciding what constitutes 'readily identifiable boundaries' for District Council areas. This is because Development Plans define settlement limits and apply land use zonings, particular those relating to green spaces between built areas, which need to be respected when defining boundaries.

Taking on board these points, the Council would refer the Commissioner back to the Final Recommendations from the previous Local Government Boundary

Review in Northern Ireland in 2008 which made clear those features which the Commissioner adjudged to constitute 'readily identifiable boundaries' in the Belfast City Council area. As the Council argued at that time, such 'readily identifiable boundaries' provided support for the principle of expansion of the Belfast Council Area.

### Additional Factors

Having stated the above, we would, however, like to make the Commissioner aware of a number of additional factors that may help inform her of the need to facilitate the expansion of Belfast's council area. There are essentially two of these: -

1. Firstly, we are well aware that the definition of Local Government Districts is very much premised on achieving greater efficiency in the delivery of services, in terms of securing better value for money and quality of service.

The definition of such boundaries must allow for the creation of a critical mass of population within the Belfast Council Area upon which to sustain and improve upon efficiency in the delivery of services. We say this for the very good reason that Belfast City Council has a disproportionate number of deprived wards in Northern Ireland.

Following the 2008 review a number of wards of similar socio-economic standing were included within the new Belfast City Council area (Twinbrook and Collin Glen, which are ranked the twentieth and the twenty first most deprived wards), making it even more imperative that the Belfast Local Government District be equipped with an optimum population size and geographical area capable of sustaining and improving services.

2. Secondly, we attach appreciable significance to the Regional Development Strategy for Northern Ireland and its aspirations (under SPG-BMA 1) to create a thriving Belfast Metropolitan Area based on a revitalised City of Belfast. In this regard, we view Belfast as the regional driver of growth in Northern Ireland and all efforts to promote this objective in the form of bolstering its population size should be welcomed. This is especially so when it is considered that, in recent times, Belfast has endured significant population loss to surrounding districts.

### **(ii) Specific Response in relation to Belfast**

Against the background of the general points outlined above, we would like to make the following comments in respect of the existing Belfast City Council district boundary.

## Boundary with Lisburn and Castlereagh City Council

The previous Local Government Boundary Review for Northern Ireland - Final Recommendations 2008 included a recommendation to place the Galwally area (including Forestside) within the new Belfast City Council district area. However, as the Commissioner will be aware, the NI Assembly ultimately approved the Final Recommendations with some amendments, one of which included the placement of the Galwally area within the new Lisburn and Castlereagh City Council area. Belfast City Council would contend that this decision by the NI Assembly disregarded the logic governing the need to have regard to the 'readily identifiable boundaries' guidelines and was in contravention of the clear recommendations of the Boundary Commissioner.

This decision, as Belfast City Council argued at the time, amounted to an irrational departure from those features that have helped to shape the delimitation of the District Boundary in this part of Belfast, namely the readily identifiable boundaries of the Outer Ring Road and the upland topography in this area. Indeed, when viewed on a map, it graphically stands out as an aberration in boundary demarcation.

### Forestside catchment area

There are different ways to approach the calculation of catchment area figure as it can be done on a spend or population (customer) basis, both of which could be further refined in many ways to take account of the different days, times of travel, population / household composition, socio/economic group.

The Council however believe that that the simple drive time catchment analysis could be utilised as it is based on published data and standard tools.

The appended diagram shows the extent of the catchments generated for 0-5, 5-10, 10-15 and 15-20 minutes. For the table these polygons were used to determine the number of residential properties (using the OSNI Pointer Domestic Address from 27/07/2021).

Drivetime Catchment	Percentage of Pointer Domestic Addresses by Council Area				
	Belfast	Lisburn & Castlereagh	Ards & North Down	Newry, Mourne & Down	Antrim & Newtownabbey
0 - 5 mins	<b>69.6</b>	30.4	0.0	0.0	0.0
0 - 10 mins	<b>84.3</b>	15.6	0.1	0.0	0.0
0 - 15 mins	<b>74.4</b>	19.5	4.8	1.1	0.2
0 - 20 mins	<b>62.7</b>	20.4	8.5	2.5	5.9

There have been no major applications at Forestside that could provide an assessed catchment for the Centre although the Centre was assessed as part

of the Lisburn & Castlereagh Retail Capacity Study 2018. In para 6.5.4 (page 25) of that study the concluding statement is at best a simplification in terms of potential draw from outside *"In the Forestside catchment, it was estimated that 50% of the comparison turnover of the centre came from outside the area; principally from the Belfast suburbs, as the shopping centre is right on the border of the Council area"*. Both the average household size and available income would have to be significantly higher to sustain such a conclusion.

Belfast City Council also notes that the various objections from the former Lisburn and Castlereagh councils to the Final Recommendations in 2008 in respect of this area, (whilst not being deemed sufficient at that time to change the Final Recommendations), which carry less weight now given that i) the majority of LCCC council services have since been transferred to the Island Civic Centre in Lisburn, and ii) a range of new bus routes has been introduced since 2008 (including the Glider service and the proposed Phase 2 of Glider) which extend routes into the Lisburn and Castlereagh district.

The Council would also make a case based on which authority is best placed to manage and address the wider implications of the District Centre's operations, accessibility and servicing. The A55 Outer Ring Road is a significant physical barrier and much of the potential for improvements in accessibility with potential for better integration into the surrounding urban areas would naturally lie with Belfast City Council in relation to the geography of the site and the potential for integration with existing services.

Taking into account each of these points, and the Commissioners previous recommendations, the Council does not agree with the Provisional Recommendation at para 7.3.1 which recommends that the Belfast "district boundary line should remain unchanged".

Belfast City Council would therefore requests that the Local Government Boundary Commissioner reassess the findings of the 2008 Local Government Boundary Review including the "Final Recommendations" report and the "Report of the Assistant Commissioner Sarah Havlin on Belfast City Council district" which clearly recommended that the Galwally area containing Forestside should reside within the Belfast district boundary based on the statutory parameters highlighted above.

### **District Boundary with regards to the Harbour Ward**

The Council also wish to highlight an issue with the district boundary as it pertains to the Harbour ward, and in particular the extension to the harbour which has resulted in part of the harbour infrastructure existing outside of the district boundary (see image below).

## Existing Situation (area currently beyond the BCC boundary)



The exercise of powers and responsibilities are normally linked to the LGD geography. This creates an issue for the Council not only in terms of rates but also for enforcement with regards to any event which may happen beyond our line and therefore jurisdiction. The Council would note that there is a further approved extension (planning permission at appendix 1) beyond the currently constructed area shown on the plans – see red line below. The Commissioner when considering any modification to the district boundary may wish to take this into account also.

## Example of potential new boundary to encompass the extension of the Harbour



## **Conclusion**

In summary, Belfast City Council does not agree with para 7.3.1 of the Provisional Recommendations report which states that the district boundary line should remain unchanged. The Council would refer to the following two issues in relation to the district boundary.

### **Galwally Area (including Forestside)**

The Council request that the Local Government Boundary Commissioner reassess the findings of the 2008 Local Government Boundary Review including the "Final Recommendations" report and the "Report of the Assistant Commissioner Sarah Havlin on Belfast City Council district" which made clear recommendations that the Galwally area containing Forestside should reside within the Belfast district boundary.

The Council would argue that the principles upon which the 2008 recommendations were made and those features which the Commissioner determined to constitute 'readily identifiable boundaries' in respect of this area (namely the A55 Outer Ring Road and the upland topography in this area) have not changed.

### **Harbour Area**

The Council also wish to highlight the issue with the district boundary as it pertains to the Harbour ward, and in particular the extension to the harbour which has resulted in part of the harbour infrastructure being outside of the district boundary.

The Council would note that there is a further approved extension beyond the currently constructed area shown on the plans. The Commissioner when considering any modification to the district boundary may wish to take this into account also.

**John Walsh**

City Solicitor

On behalf of Belfast City Council  
September 2021