

**REPORT OF THE ASSISTANT LOCAL GOVERNMENT BOUNDARIES
COMMISSIONER FOR THE PROPOSED DISTRICT OF
BELFAST CITY**

Brendan Patterson, Assistant Local Boundaries Commissioner

November 2021

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Section One: **Background and Statutory Framework**

Background

- 1.1 The commencement of the current Review of Local Government Boundaries in Northern Ireland was announced in a Public Notice on 3rd February 2021 which explained the role and remit of the Local Government Boundaries Commissioner and advised that in due course the Commissioner would publish Provisional Recommendations and may cause a public hearing to be held in each of the current eleven Local Government Districts. The Notice and a subsequent information video placed on the Commissioner's website (<https://www.lgbc-ni.org.uk/>) explained the process and the opportunities for participation in the consultation on the Provisional Recommendations.
- 1.2 The terms of the Review are set out in Section 50 and Schedule 4 of the Local Government Act (Northern Ireland) 1972 as amended. Copies of the legislative framework are available on the Commissioner's website.
- 1.3 The Commissioner's Provisional Recommendations with proposed boundaries and names of 11 Districts and their 462 constituent wards were published on the Commissioner's website on 27th July 2021 and announced by way of Public Notice, inviting comments on the proposals made. The consultation was launched on Citizen Space to enable ease of public inspection and maximum public participation. Accessibility points for online access to the Proposals and the consultation portal was facilitated at public facilities including Council premises and public libraries by the Commissioner's team in partnership with local councils and with Libraries Northern Ireland. Hard copies of any part of the Proposals or the associated maps as required by any person were made available on request. Other accessibility requirements were promoted on the Commissioners website including language translation, braille and sign language.
- 1.4 The consultation portal was open for 8 weeks and closed on 21st September 2021. Details of the programme of public hearings was notified by press release, social media channels and on the Commissioner's website in September 2021
- 1.5 The Commissioner received 35 representations in respect of the proposals, specifically applicable to the District of Belfast City, being 29 responses received to the consultation on the Commissioner's Provisional Recommendations through the online portal, 2 written submissions submitted via email, and 4 oral submissions during the public hearing held on 5th October 2021.
- 1.6 All written representations received were acknowledged and have been made available for inspection on the Commissioner's website.
- 1.7 I was appointed as an Assistant Commissioner by The Department of Communities on 1st August 2021. My task is to gather, assess and report on the representations made in relation to this proposed District of Belfast City and to submit a report to the Commissioner including my conclusions and recommendations, within 4 weeks of the end of the relevant public hearing. I conducted a public hearing in this proposed District at Crowne Plaza Hotel, Belfast on 5th October 2021.

- 1.8 The Public Hearing was staged under the requirements of government guidance and observance of public health recommendations in respect of the Covid-19 Pandemic. Numbers in the room at any one time was limited to 20 persons with alternative participation facilitated by a simultaneous online interactive platform.

Written Representations

- 1.9 Written representations of relevance to this District are listed in Section Seven of this report. All written representations were considered by me in advance of the public hearing and in anticipation of the preparation of this Report.

Public Hearing

- 1.10 The Public Hearing on the Provisional Proposals was attended by nine people, being four attendees in person and five attendees via the online platform. The hearing was facilitated in an informal and accessible manner where all participants were afforded the opportunity to give their views and to question the submissions and viewpoints expressed by others. Participants were asked to either identify as individuals or representatives of an organisation. The list of organisations represented and a brief summary of their submissions is at Section Seven: References and List of Submissions - Part Two: Oral Submissions at Public Hearing (held on 5th October 2021)

My Report

- 1.11 This report presents and addresses the written and oral views of interested parties in respect of the Commissioner's Provisional Recommendations for the proposed District of Belfast City. In particular it addresses the relevant local information and opinion about the boundaries and names of the District and its wards. I have set out details of support of the Commissioner's proposals and objections and/or counter-proposals. I have also set out my conclusions on the issues raised which are permissible matters for consideration under the legislative framework of this Review. Any matters submitted that are not relevant or permissible considerations under the legislative parameters of the Review have been outlined in this report as having been submitted, but those issues will not have formed part of my deliberations.
- 1.12 As part of my research for this report I have studied and tested any areas of the District where alternative boundaries have been proposed by use of GIS mapping systems of the Land and Property Services of Northern Ireland. This has been facilitated by the staff of Ordnance Survey Northern Ireland and I am indebted to their technical assistance.

Section Two: **District Boundaries**

2.1 Within the written and oral submissions received from Belfast City Council, it is noted that there was a request to change the district boundary at two locations. The outline and considerations of these are detailed here:

Forestside (Galwally Ward)

2.2 On 17th September 2021, Belfast City Council (BCC) made a written submission (full copy of which can be found in Section 8: Appendices C or online at [Belfast City Council - Submission to the LGBC.pdf \(lgbc-ni.org.uk\)](https://www.lgbc-ni.org.uk/Belfast-City-Council-Submission-to-the-LGBC.pdf)).

2.3 In relation to Forestside, the main points from the BCC written submission received were:

- Clarity on the statutory parameters when defining 'readily identifiable boundaries';
- Belfast District, being the regional driver of growth in NI, necessitates the increase of population within the district wherever possible;
- The previous Local Government Boundary Review (2008) recommended placing Galwally Ward (including Forestside) within BCC, however a subsequent review by the NI Assembly ultimately placed Galwally Ward within Lisburn & Castlereagh City Council (LCCC) and that this decision amounted to an irrational departure from the 'readily identifiable boundary' concept (in this instance being the A55 Outer Ring Road);
- Drive Time Catchment Analysis that shows the close proximity of Belfast residents to Forestside, in comparison to other Council areas;
- BCC making the case that their authority is best placed to manage and address the wider implications of the District Centre's operations, accessibility and servicing; and
- Request that the LGB Commissioner reassess the findings of the 2008 Local Government Boundary Review which clearly recommended that the Galwally area containing Forestside should reside within the Belfast district boundary.

2.4 This written submission was further referenced by BCC during the public hearing on 5th October 2021 and highlighted two main points for consideration:

- 1) Forestside (Galwally Ward) issue
- 2) Harbour extension issue

2.5 The submission regarding Forestside requested that the Forestside Retail Park (the area to the West of the A55 Outer Ring Road within the Galwally Ward, and not the entire Galwally Ward) which currently sits within the Lisburn and Castlereagh District, be brought into the District of Belfast City under this review.

2.6 The detail in the written submission was further supported during the public hearing by BCC who again provided the content of the submission and the rationale for the proposed changes, summarized mainly as:

The final recommendations in 2008 included a recommendation to place the Galwally area, including Forestside, within the new Belfast City Council district area. However, the Northern Ireland Assembly ultimately approved the final recommendations with some amendments, one of which included the placement of the Galwally area within the new Lisburn & Castlereagh City Council area. Belfast City Council contend that this decision by the Northern Ireland Assembly was not based on the rules regarding the desirability of determining readily identifiable boundaries and was a departure from the recommendations of the Commissioner.

This decision as Belfast City Council argued at the time, amounted to an irrational departure from those features that 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. 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.

The Council would also make a case based on which authority is best placed to manage and address the wider implications of the district centres 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. The designation of Forestside as a district centre will not be affected by any changes to the local government boundary (taken from BCC verbal submission during public hearing held on 5th October 2021)

- 2.7 During the public hearing held on 5th October 2021, representatives from Sinn Fein expressed support from the party for the BCC submission to adjust the boundary at Forestside Retail Park and to bring it within the Belfast District boundary area. The suggested approach from Sinn Fein was *“in regards to Forestside Retail Park we would ask the Commission to have a look at the industrial lands at the cuts which we would actually find is a more natural boundary.”*
- 2.8 It is noted that The Commissioner’s approach in her Recommendations is only to intervene in the district boundary line if there is compelling reason to do so. I have considered the evidence submitted to determine if there is compelling reason in this instance to recommend a change to the district boundary line.
- 2.9 I have considered the permissible matters for consideration under the legislative framework of this review and whilst the BCC submission that the previous review placed Forestside within the District of Belfast City is noted, it is also evident that subsequent to the final recommendations being made in the previous review, there was a further process that took place within the NI Assembly that ultimately placed Forestside within the Lisburn & Castlereagh District. The fact is that this decision was made by the NI Assembly and is historically agreed, therefore I do not see compelling evidence to convince me that we should deviate from the

Commissioner's approach in this review where minimum disruption is preferred and I recommend in this instance to follow the Commissioner's recommendation: *I recommend that the district boundary line should remain unchanged.* (Section 7.3.1 Commissioner's Provisional Recommendations Report, 27th July 2021)

Harbour

2.10 On 17th September 2021, Belfast City Council (BCC) made a written submission (full copy of which can be found in Section 8: Appendices C or online at [Belfast City Council - Submission to the LGBC.pdf \(lgbc-ni.org.uk\)](https://www.lgbc-ni.org.uk)). This submission was also further detailed by BCC during the Public Hearing held on 5th October 2021 and highlighted the issue with the district boundary as it pertains to the Harbour Ward. The rationale for this submission is as follows:

- In particular, there is an extension to the Harbour which has resulted in part of the Harbour infrastructure being outside of the district boundary;
- There is a further approved extension beyond the currently constructed area showing on the current plans; and
- This creates an administrative issue for the council, not only in terms of rates evaluation but also for enforcement with regards to any event which may happen beyond our line and therefore, jurisdiction.

2.11 I believe that there is defacement to the existing district line between the District of Belfast City & Belfast Lough. Therefore it is reasonable to suggest that the district line should be amended to encompass existing and future development of the Harbour estate.

Section Three: **Ward Boundaries**

Belfast District Wards

- 3.1 On 21st September 2021, Social Democratic Labour Party (SDLP) made a written submission (full copy of which can be found in Section 8: Appendices D or online at [South Belfast SDLP Boundary Review Consultation Response September 2021.pdf \(lqbc-ni.org.uk\)](https://lqbc-ni.org.uk) and this written submission was further referenced by SDLP during the public hearing on 5th October 2021 and highlighted the following main points for consideration:
- Concern that the current proposals within the Botanic DEA “*carve up what are continuous communities within the wards which I feel would be deleterious to the sense of community cohesion within those wards, not to mention I suppose a sense of common purpose in terms of the continuity there is between streets currently that exists within those wards which enables them to operate collectively in terms of local issues and engage with local representatives.*” (Taken from Public Hearing, 5th October 2021). Note - a review of DEA’s is not applicable to this review, therefore where submissions are made in relation to DEA’s, these have been noted, but not considered;
 - Concern that the current proposals are based more on the required mathematical balancing than taking into account the actual experience and liveability of these wards on the ground and are therefore artificially separating communities and goes against the essence of democratic participation where established communities work with their recognised elected representatives for the ongoing enhancement of their area;
 - Suggest the addition of one additional ward within each of the Balmoral DEA & the Botanic DEA, to therefore have 12 wards as opposed to the current 10 within these areas (additional ward in each DEA) to take account of natural population growth within this area and to redesign the 12 wards in such a way as to accommodate, facilitate and recognise the natural growth of this part of the city rather than artificially cleaving it apart and splitting up communities; and
 - Clarity that the possibility of adding additional wards has been done in the past when required (citing the example of a precedent being set when additional wards were added in Newry, Mourne and Down and in Armagh, Banbridge and Craigavon during previous reviews).
- 3.2 Concern that the current proposals will artificially spilt existing communities (citing an example of the proposed changes adjacent to the Ravenhill Road along the Park Road, North Parade and South Parade with these being very distinct and unified communities and part of the Ormeau Road community and the problems that would occur if they were moved into the Ravenhill Ward)
- Concern that the current proposals will lead to a lack of community cohesion in areas where there is already an existing issue with low voter turnout

- Concern that the current proposals will negatively affect what are diverse communities and will create shells of communities, tilting the wards towards vast tracks of under populated areas where you have a transient population such as The Holylands or the wider university area or parts of the inner city

3.3 The Commissioner's Provisional Recommendations Report, 27th July 2021 states that:

Number of Wards in a District

4.8

Paragraph 18(1) presumptively sets the number of wards in each district at 60 for Belfast and 40 for the other ten districts, subject to sub-paragraphs 18(2) and (3), which give me the discretion, having regard to factors in paragraph 17, to recommend that the number of wards can be increased and decreased by a maximum of 5. I have been mindful of this discretion in developing my provisional recommendations.

3.4 In response to this submission and the potential allowance of additional wards as stated in the Provisional Recommendations Report, the feasibility of adding additional wards (whilst adhering to the Report's guidance that '*Within any one district there shall, as far as is reasonably practicable having regard to paragraph 17, be substantially the same number of local electors in each ward*') to the area was examined by the OSNI team.

3.5 Based on this exercise, it would be feasible to add an additional ward to this area, which would take cognizance of the valid arguments put forward in the SDLP submission, and provide an enhanced model which would give a more evenly distributed electorate within these wards.

3.6 Counter to the Commissioners recommendation (Commissioner's Provisional Recommendations Report, 27th July 2021) at 7.3.2 which states that *I recommend that Belfast district should remain comprised of 60 wards*, the counter proposal put forward in the SDLP submission has merit and it is achievable under the required balancing of electors within each ward as being 'substantially the same'. I recommend that the Commissioner should consider my revised recommendation that the SDLP submission is partially accepted and that an additional ward is added to the District of Belfast City.

3.7 Pursuant to Section 50 of The Local Government Act (Northern Ireland) 1972, Schedule 4 of that Act sets out the statutory basis on which the Local Government Boundaries Commissioner shall be appointed, regulate his own procedure and make recommendations (hereafter referred to as the legislation) and under Part III, paragraph 18 (1) (a) states that *in the district of Belfast the number of wards shall be 60. However Part III, paragraph 18 (2) states that Where, having regard to the matters mentioned in paragraph 17, the Commissioner considers it desirable that the number of wards in any district should be more than that specified in sub-paragraph (1), the number of wards in that district may be increased by not more than 5. Part III, paragraph 17 states in determining the number and boundaries of*

wards within a district regard shall be had to- (a) the size, population and physical diversity of the district.

- 3.8 I believe that with the submission, relevant legislation and revised proposal considered, it is a desirable outcome to increase the number of wards within the district and therefore, I recommend the revised 61 ward model for the District of Belfast City with new ward boundaries for Blackstaff, Central, Stranmillis and Windsor, and the addition of a new ward boundary (revised ward boundaries and new ward can be seen in Section Eight: Appendices A) be approved.
- 3.9 In reaching the recommendation of adding another ward to the District of Belfast City, I have considered the given legislation in Part III, paragraph 17a in determining the number and boundaries of wards within a district; and in these particular wards (Blackstaff, Central, Stranmillis and Windsor), there has been a significant population growth since the last review in 2009.
- 3.10 To consider the implications of the proposal of adding a 61st ward to the District of Belfast City area, I explored options with assistance from the OSNI team and this looked at the four inner city wards of Blackstaff, Central, Stranmillis and Windsor as they had a particularly high electorate count and thus, I reasoned that this would be the preferable area to add an additional ward.
- 3.11 This additional ward would help to ensure the electorate was substantially the same across the district and to support the legislation at Part III, paragraph 19 (1) which states that Within any one district there shall, as far as is reasonably practicable having regard to paragraph 17, be substantially the same number of local electors in each ward.
- 3.12 This proposal may have knock-on effects on all the wards across the District of Belfast City, which will need further examination by the Commissioner
- 3.13 The above process necessitated the addition of a new ward, which I recommend to be called 'University' due to the campus of Queen's University falling within its catchment area, the immediate surrounding student accommodation and other features being aligned to the University in this locality.
- 3.14 It is noted that the SDLP submission made a proposal to request an additional two wards but my recommendation is that the addition of one new ward is a sufficient compromise that meets the needs set out in the submission.
- 3.15 In summary it is noted from the SDLP submission that:
- Issue 1 – Proposal to add additional wards(s) – this has been partially accepted with the recommendation of one additional ward, but not two
- Issue 2 – Proposal to review the Boundary between Ormeau and Ravenhill – this is accepted subject to the following potential solutions:
- Solutions to issue 2:
- a. If the 61 ward model is adopted then there will be no need to implement the given boundary changes that moved sections off the Ravenhill Road (parts of Park Road, North Parade and South Parade being moved from Ormeau ward to the Ravenhill ward) as per the Commissioner's Provisional

Recommendations Report, 27th July 2021, which was one of the concerns raised in the SDLP submission;

Thus, Ravenhill reverts to the current ward boundary as per prior to this review, however with a small change at the boundary between Ormeau and Rosetta (in Hampton Drive) as required to balance the electorate count - See ward maps in Section Eight: Appendices B; and

- b. If the 61 ward model is not adopted, I believe there will be a need to make changes between the Cregagh and Ravenhill wards and these are shown in the revised ward maps for Cregagh and Ravenhill in Section Eight: Appendices B. Whilst the Commissioner’s provisional recommendations as per the Commissioner’s Provisional Recommendations Report, 27th July 2021 split a residential street, this solution uses a stream-line which allows the residential street to remain intact, therefore providing a more readily identifiable boundary and I believe this proposal should be accepted

3.16 Please see below for table and additional notes regarding ward electorate numbers that will be changed based on the 61 ward model, with the other ward electorate numbers remaining as per *Table 3. Belfast* in the Commissioner’s Provisional Recommendations Report, 27th July 2021.

3.17 It should be noted that if the revised 61 ward model is approved for Belfast City, the District will still have the lowest representation of councillors per electorate across NI.

61 ward model

Average ward size – 3774

Ward	Current electorate	New electorate (based on new 61 ward model)
Blackstaff	4398	3698
Central	5282	3982
Stranmillis	4391	4088
Windsor	4865	3617
New ward 'University'	-	3551

3.18 Note - Changes made to Finaghy, Malone, Musgrave & Upper Malone for provisional recommendations would be unnecessary and could be discarded with those wards reverting to their original boundaries which gives less disruption to the area.

60-ward model (shown below is the solution if the change to 61 ward model is not adopted)

This would impact on the ward electorate numbers as follows:

Average ward size - 3837

Ward	Current electorate	New electorate (60 ward model)
Ormeau	4200	4200
Ravenhill	3399	3485
Cregagh	3577 (after initial recommendations)	3491

3.19 A further proposal contained within the SDLP submission (verbal submission during the public hearing held on Tuesday 5th October 2021) was also noted:

3.20 I think it is something the Commissioner should take under consideration, the transfer of those eight houses (on the Glencregagh Road) into Belfast District and transfer the Drumkeen, the whole of Drumkeen Court Retail Park into the Belfast District as well

3.21 Whilst this proposal was noted, I recommend that the boundary line is not amended in this instance as although considered, I do not deem a change to be practical due to the existing district boundary currently following a readily identifiable boundary. It is noted that The Commissioner's approach in her Recommendations is only to intervene in the District Boundary line if there is compelling reason to do so, and having considered the evidence submitted I have determined that there is not a compelling reason in this instance to recommend a change to the District Boundary line.

3.22 There was also an Individual Submission received during the written consultation period as follows:

Individual

Parts of the borders are very arbitrary, especially in North Belfast area. Rather than having based decisions based on shared characteristics and accessibilities (e.g. Alexandra Park area being divided on socio-economic factors), the way that area has been split between Duncairn, Fortwilliam and Waterworks seem to be based on the shape and names of streets. Duncairn near Fortwilliam/Waterworks shares the area nearby Sydenham and Ballymacarett, which have very different residential concerns.

While some arbitrary judgement might be required to split area into different wards, unfortunately, the recommendations fail to put the emphasis on the shared concerns and characteristics of the residents, and seem to take a 'ruler and scissors' approach based on the shapes and names of streets cutting across the residential area. Perhaps making more importance of this element in future recommendations might be useful to learn more about effective policy making and improving social statistics information.

3.23 While the above Individual submission was noted and considered and the Individual raises interesting points, these points are not permissible under the scope of this review, so therefore I deem that this does not constitute compelling evidence to make any further changes to the Commissioner's initial proposals, in this instance.

Section Four: Names of District and Wards

- 4.1 I am aware that there has been a wider representation across the whole Review in terms of the adoption of a bilingual or trilingual naming policy for the whole map of the Local Government Districts and Wards in Northern Ireland. This is a matter for wider consideration by the Commissioner rather than a District of Belfast City specific issue.
- 4.2 Submissions which support the use of Irish/Ulster Scots/Ullans language across the Review proposed by, for example, language lobby groups which have been made in terms of the naming of all District and Wards in either bilingual or trilingual terms will be fully considered by The Commissioner on the basis of the comprehensive submission made on a wholesale basis across the Review and her conclusions will be published in the Revised Proposals Report.

The Commissioner's Provisional Recommendations Report, 27th July 2021, states that:

5.5

I have to date received a representation that both districts and wards should be named in Irish or bilingually with English or in a trilingual naming convention with both English and Ulster Scots. I have not included this in my provisional recommendations; I would invite further representations on this issue in the course of the wider public consultation that is now open.

- 4.3 In response to this, and specific to the District of Belfast City, there were a number of written submissions received following the Report being published on 27th July 2021, in addition to two verbal submissions during the public hearing held on 5th October 2021. The written submissions specifically related to the District of Belfast City that were received to the consultation on the Commissioner's Provisional Recommendations through the online portal are listed at Section Seven: **References and List of Submissions** page 22 (note general submissions on a region-wide basis are not listed here). These can also be viewed at [Consultation Responses | Local Government Boundaries Commissioner for Northern Ireland \(lgbc-ni.org.uk\)](https://www.lgbc-ni.org.uk/consultation-responses-local-government-boundaries-commissioner-for-northern-ireland).

These written submissions contained diverse and conflicting opinions on whether bilingual/trilingual naming of districts and wards should be taken forward.

- 4.4 The main arguments for the use of bilingual naming of the District of Belfast City and wards in English and Irish were as follows:
- Support large numbers of Irish-medium schools and pupils who are learning Irish language every day;
 - Original place names are derived from Irish;
 - Increase visibility of the Irish language and be more inclusive of Irish speakers;
 - Requirement under International Law, e.g. European Charter for Regional & Minority Languages;

- Create awareness and tolerance around the Irish language; and
 - Promotes heritage and history.
- 4.5 In a general regard, from all the written submissions received, both specific to the District of Belfast City and more generally across the entire NI region, there were 83 written submissions that were supportive of a bilingual approach.
- 4.6 The main arguments against the use of bilingual naming of the District of Belfast City and wards in English and Irish were as follows:
- Creates more division and unrest;
 - Would be divisive and separate communities; and
 - The proposed bilingual languages are dead.
- 4.7 In a general regard, from all the written submissions received, both specific to the District of Belfast City and more generally across the entire NI region, there were 63 written submissions that were not supportive a bilingual approach.
- 4.8 There were two general written submissions in support of a trilingual approach to include English, Irish and Ulster Scots and a further general written submission in support of a bilingual approach to include English and Ullans.
- 4.9 There were a further three general written submissions received by email which can be viewed at Consultation Responses | Local Government Boundaries Commissioner for Northern Ireland (lgbc-ni.org.uk). These represented 2 submissions against bilingual naming of districts and wards from individual submissions and 1 submission in support of bilingual naming of districts and wards from Foras na Gaeilge.
- 4.10 Given the amount of respondents that expressed a general viewpoint on the issue of bi-lingual or tri-lingual district and ward names, I would reaffirm the Commissioner's view that there needs to be a further process in terms of the adoption of a bilingual or trilingual naming policy for the whole map of the Local Government Districts and Wards in Northern Ireland.

Specific to District of Belfast City:

- 4.11 During the public hearing on 5th October 2021, there were a further two verbal submissions in relation to this topic.
- 4.12 Sinn Fein made a submission with regard to the bilingual place names issue which included:

What we're looking to do and what many constituents have asked myself, and I totally agree with this, is that they're asking that Irish language is respected and they're allowed to use the median of Irish with regards to some of the place names in the areas where they live and the areas where they work and play and go to have their education as well.

- 4.13 Further email correspondence from Sinn Fein received on the 5th October 2021 clarified that their submission is not a request to change ward names, but that Irish should be reflected in wards, for example – Shaw's Road is Bóthar Seoighe in Irish, so when the ward title is being used it should be Shaw's Road/Bóthar Seoighe

(Shaw's Road used as an example because of the rich history of the urban Gaeltacht in that area.)

- 4.14 The submission suggests that a mechanism should be set up whereby if constituents in a particular ward wish to see their ward name bilingually, then a process is established to facilitate that. The submission suggests that the Commissioner looks at a mechanism in which residents within individual wards can have a petition or other trigger mechanism so that the residents of a particular ward can request their signage in bilingual or trilingual languages – a mechanism that is currently absent (Belfast City Council currently have a Street Signage Policy).
- 4.15 Further to a written submission sent to the Commissioner in April 2021, Conradh na Gaeilge representatives also made a verbal submission at the public hearing held on 5th October 2021 and highlighted the following main points for consideration:
- Expressed disappointment that the initial proposals submitted in April 2021 weren't included in the provisional recommendations;
 - That Conradh na Gaeilge, as a public body, believe that the Local Government Boundaries Commissioner, the Commissioner and the Department of Communities have international obligations under Irish Language that are included in the European Charter for Regional Minority Languages around the use and visibility of place names, around signage and around public bodies promoting and developing the Irish language;
 - Recommend that place names that derive from Irish and other languages such as Scots should be legally recognised, and council and ward names should have legal recognition of their bilingual versions;
 - Evidence of the breadth of use of the Irish language currently in NI, citing around 7,000 to 7,500 people who are being educated through the medium of Irish, around 180,000 people who have some knowledge of Irish and a lot more who are learning Irish;
 - Expressed a hope that this will be the beginning of normalising and encouraging bilingualism, bilingual signage and that shared spaces can have bilingual signage and an increased visibility of the signage;
 - Cited the fact that at least 90% of NI place names derive from Irish, for example Newry & Mourne, Belfast, Giant's Causeway, Coast & Glens, Derry and Strabane all derive from Irish. Examples given such as Belfast being Beal Feirste, or the electoral ward of Black Mountain being Sliabh Dubh or the area of Whitefort which would be Ballydownfine. Stated that there are many examples throughout the North and that body of work and research has been completed by the likes of Queen's University, the Ulster Place Name Society (although this does not include a comprehensive list of all ward names);
 - Expressed the point that the visibility of the language has a huge role in normalising but also increasing tolerance to the language; and
 - Suggested that as NI is a region within the wider European context which is seen as a global leader in language revitalisation, that there is a place for bodies such as the Local Government Boundaries Commission to support this process, particularly as the New Decade, New Approach legislation and the fifth COMEX Report from the Council of Europe are now urging government bodies to ensure that correct forms of place names are now visible.

- 4.16 In response to the Assistant Commissioner's offer to visit areas as required, I was requested by Sinn Fein representatives during the public hearing on 5th October 2021 to visit the urban Gaeltacht area of Shaw's Road, Belfast to develop greater understanding and awareness of the bilingual naming issue.
- 4.17 This visit was conducted on 18th October 2021 and included a tour of the Shaw's Road area, where the urban Gaeltacht area exists, mainly to display the relevance of the Irish language on the locality, and in particular with reference to the impact of Irish medium schools within the locality. The visit was hosted by representatives from the Irish Language Medium Education Sector and Conradh na Gaeilge and I was supported by a representative from the LGBC Secretariat.
- 4.18 The visit on 18th October 2021 was an informative, fact-finding exercise and provided further support for the submissions regarding future implementation of bilingual ward and district naming. In particular, the visit provided:
- Clear evidence of the widespread use of the Irish language in the locality, especially as a result of the well-established Irish medium schools in the area;
 - Discussion around the issue that the use of Irish shouldn't be seen as a threat to others, but moreover as a shared opportunity to promote learning and understanding of heritage and culture;
 - Insight into how local people feel they have the right to use their indigenous language in everyday life;
 - Information on how the issue is supported by International Law, such as the European Charter for Regional Minority Languages;
 - Awareness of the difficulty for local Irish speakers to be immersed in the language in certain settings, e.g. at Irish medium schools or when communicating at home, but then feeling isolated due to the lack of Irish usage in official documentation/official recognition; and
 - Discussion on what potential mechanism could be used for populations living within wards who wished to see their wards named bilingually, e.g. public petitions. However the argument was validly made that this would be time consuming, potentially costly and a further requirement for the local population to prove their desire when a much simpler and effective mechanism is already available due to the indicator of an Irish medium school within the ward area.
- 4.19 An important point raised through the various submissions is that the proposals in support of bilingual naming do not mean that there should be a universal, region-wide renaming of all wards and/or Districts in bilingual/trilingual languages. This could obviously have major negative implications where the vast majority of residents within any given ward have an express desire that this should not occur – a point clearly made within the submissions of those not in favour of bilingual naming.
- 4.20 Instead, based on the relevant submissions and evidence provided during the visit on 18th October 2021, and having considered the rationale for bilingual naming of certain wards, I recommend that wards within the District of Belfast City that reflect the use of Irish language within their locality via the indicator that they contain an Irish medium school within their ward boundary, have official recognition of the

inclusion of Irish, alongside English, in a bilingual approach, e.g. in official documentation, electoral communications, relevant signage and digital media, etc.

- 4.21 This is based on my evaluation of the submissions received and the visit on 18th October 2021 that provide compelling evidence that where a ward contains an Irish medium school, it has, in effect, already evidenced the use of local bilingualism within the locality, therefore it would be a rational conclusion to enable bilingual naming of these wards.
- 4.22 With regard to the areas within the District of Belfast City that contain a recognised Irish medium school, supporting information was provided by Conradh na Gaeilge via Language Profiles – The Status of the Irish Language in Local Councils, 2018 - full document available at Próifílí na gComhairlí (peig.ie) which details the following:

Gaelscoileanna/Aonaid | Irish-medium Primary Schools/Units

Bunscoil an tSléibhe Dhuibh | Ballymurphy Rd. [Ward: Ballymurphy]

Bunscoil Bheann Mhadagáin | Cliftonville Rd. [Ward: Cliftonville]

Bunscoil Mhic Reachtain | Lancaster St. [Ward: New Lodge]

Bunscoil Phobail Feirste | Shaws Rd. [Ward: Shaw's Road]

Gaelscoil an Lonnain | Falls Rd. [Ward: Beechmount]

Gaelscoil na bhFál | Iveagh Crescent [Ward: Beechmount]

Gaelscoil na Móna | Turf Lodge [Ward: Turf Lodge]

Gaelscoil Éanna | Glengormley [Ward: N/A as located in Antrim & Newtownabbey District]

Scoil na Fuiseoige | Twinbrook [Ward: Twinbrook]

Gaeloideachas dara leibhéal | Secondary Level Irish Medium Provision

Coláiste Feirste, Bóthar na bhFál | Falls Road [Ward: Beechmount]

- 4.23 Thus, given the above, I would recommend that the following wards within the District of Belfast City have Irish, alongside English in a bilingual format, officially recognised in their ward names:

- Ballymurphy;
- Cliftonville;
- New Lodge;
- Shaw's Road (for example the official recognition would be Shaw's Road/ Bóthar Seoighe - this example is available as it was submitted by Sinn Féin during the public hearing process – the other wards listed here would need to be translated into Irish as part of a future process);
- Beechmount;
- Turf Lodge; and
- Twinbrook.

4.24 Given that the greater District of Belfast City is made up of a divergent population, the bilingual naming of the district itself would need further consideration and consultation before a potential consensus decision could be reached. Therefore I would not recommend a bilingual naming of the district at this point.

Section Five: **Other Issues**

- 5.1 There were certain issues raised during the written consultation and public hearing which, whilst noted and considered, are not perceived to be relevant or permissible considerations within the remit of this current review. The matters raised but which could not be considered within this current review are:

Alliance Party of Northern Ireland (APNI) Submission (Written Consultation):

- 5.2 The proposed changes to the boundary between Bloomfield and Knock wards makes the boundary between Titanic and Ormiston DEAs more complicated. For clarity, the boundary should remain at North Road. This could be achieved by keeping Kerrsland Drive and Parade in Knock ward as well as both including both sides of Trolland Drive. These changes clarify the boundary as the Kerrsland are off the section of the Newtownards Road currently in Ormiston DEA;

Additionally, the proposed changes to the boundary between Ravenhill and Ormeau wards again removes a clear line of demarcation. The boundary remaining on the Ravenhill Road gives a clear boundary line between the DEAs of Botanic and Lisnasharragh; and

An additional layer on the map showing DEA boundaries would be extremely useful for political parties. It would make the impact of any changes more accessible.

- 5.3 While the above APNI submission was noted and considered, and valid arguments have been provided, some of these are not within the parameters of this review and therefore I deem that parts of this submission are not relevant to the scope of this review (The impact of ward boundary delineation on DEAs (District Electoral Areas) cannot be considered under the remit of this review. DEAs are important to council strategy but they will be subject to their own Review process immediately following the settlement of new Ward Boundaries).
- 5.4 The concern raised in 5.2 paragraph two above has been addressed as it was the subject of the recommended changes as per the similar SDLP submission.

Sinn Fein Representatives' Submission (Public Hearing):

- 5.5 Query was raised as to whether the Electoral Office is going to engage in a Polling Station Scheme (that representations could be made to) due to concerns about movements within wards that would affect the distance in which people have to walk, cycle or drive to some of the polling stations. By way of an example, Lagmore Ward was highlighted, which had around 5,000 electors but the proposals will mean it's now around 4,000 electors.
- 5.6 Nearly all of the Altan electorate, on the right-hand side of Lagmore Avenue, vote in a very local polling station, but if this was moved into Twinbrook Ward, the concern relates to those electors being moved further away from their polling station. The suggestion may be to have a split ward polling station as a local solution.
- 5.7 In response, LGBC Secretariat confirmed during the public hearing that following this review, there would be a DEA Review, and the review of polling stations would be addressed as part of that or subsequent to the DEA Review.

Section Six: **Summary of Conclusions**

District Boundaries: Forestside (Galwally Ward)

- 6.1 I recommend that the Forestside area remains within the existing Galwally Ward and remains within the Lisburn & Castlereagh District area and I reaffirm the Commissioner's recommendation: *I recommend that the district boundary line should remain unchanged.* (Section 7.3.1 Commissioner's Provisional Recommendations Report, 27th July 2021).

District Boundaries: Harbour

- 6.2 I am of the opinion that there is compelling evidence to move the district boundary line in relation to the Harbour and I therefore uphold the BCC submission and recommend that the district boundary line is amended to incorporate the newly extended Harbour area and to take into account the future planned Harbour extension.

Ward Boundaries:

- 6.3 I recommend a revised 61 ward model for the District of Belfast City with revised ward boundaries for Blackstaff, Central, Ormeau, Stranmillis, Windsor, Cregagh and Ravenhill and the addition of the new ward boundary, 'University'. The new revised wards can be seen in Section Eight: Appendices A/B.

Names of District and Wards:

- 6.4 I recommend that the wards within the District of Belfast City that contain a recognised Irish medium school (being Ballymurphy, Cliftonville, New Lodge, Shaw's Road, Beechmount, Turf Lodge and Twinbrook) have Irish, alongside English in a bilingual format, officially recognised in their ward names, e.g. in official documentation, electoral communications, relevant signage and digital media, etc.
- 6.5 Given that the greater District of Belfast City is made up of a divergent population, the bilingual naming of the district itself would need further consideration and consultation before a potential consensus decision could be reached. Therefore I would not recommend a bilingual naming of the district at this point.

Section Seven: References and List of Submissions

Part One: List of Written Submissions (note submissions listed below relate to specific submissions relevant to the District of Belfast City and do not include general submissions)

Responses received to the consultation on the Commissioner's Provisional Recommendations through the online portal after close on 21st September 2021

Individual	<p>Parts of the borders are very arbitrary, especially in North Belfast area. Rather than having based decisions based on shared characteristics and accessibilities (e.g. Alexandra Park area being divided on socio-economic factors), the way that area has been split between Duncairn, Fortwilliam and Waterworks seem to be based on the shape and names of streets. Duncairn near Fortwilliam/Waterworks shares the area nearby Sydenham and Ballymacarett, which have very different residential concerns.</p> <p>While some arbitrary judgement might be required to split area into different wards, unfortunately, the recommendations fail to put the emphasis on the shared concerns and characteristics of the residents, and seem to take a 'ruler and scissors' approach based on the shapes and names of streets cutting across the residential area. Perhaps making more importance of this element in future recommendations might be useful to learn more about effective policy making and improving social statistics information.</p>
Individual	<p>Ba chóir glacadh leis an moolah faoi ainmneacha dhá theangach. Gaeilge agus Béarla</p>
Individual	<p>This will again create more division More interference with something that's not broken leads to more unrest and division.</p>
Individual	<p>The wards should remain the same name as they currently are, I do not want to see divisive ward names which are used to separate communities, Irish and Ulster Scots names will be used to mark out territory, we already have this with sectarian graffiti and this will just add to it in a more official way. It will also be discriminatory to our new communities, English language is the default language used by 99% of people for communication, I see no benefit to any community in changing this.</p>
Individual	<p>No need for Irish or Ulster Scots naming of wards or districts. Do not support naming wards in bi or tri lingual fashion.</p>
Individual	<p>Names of wards should be kept as they are presently. The names of local government wards should be kept as they are presently or changed to bilingual wards with the ward name in both English and Ullans.</p>

Individual	<p>Is údar mór díomá dom é nach bhfuil leagan dátheangach de na toghbhardaí agus na ceantair thoghchánaíochta ar fáil. Mar Ghaeilgeoir a chaitheann mo shaol ar fad trí Ghaeilge, ba chóir go mbeadh an ceart agam níos mó rochtana a bheith agam ar an Ghaeilge, go háirithe in údarais phoiblí. Mholfainn go láidir an moladh seo a chur san áireamh.</p> <p>Ní thuigtear dom cén fáth nach bhfuil leagan dátheangach de na toghbhardaí ar fáil. Gaeilge agus Béarla le do thoil.</p>
Individual	<p>I do not agree that the names be in Irish which is a dead language or ulster scots which is also a dead language.</p>
Individual	<p>I do not agree with bilingual nor trilingual district or ward naming.</p>
Individual	<p>It would be great, particularly given the large number of Irish-medium schools in this district, if the names of electoral wards and districts were made available in Irish as well as English. These recommendations should include an Irish translation of the placenames, given that for many of the district areas and electoral wards, these names are originally derived from Irish. Therefore, there should be no question as to the inclusion of Irish.</p>
Individual	<p>Street names should be available in both Irish and English. Given the large number of Irish Medium schools in the area, I feel it is only right that the boundaries reflect this by increasing visibility of the Irish language where possible.</p>
Individual	<p>I think that names should be bilingual in both English and Irish.</p> <p>As a member of the Irish speaking community, and as a mother of two children who are bilingual and attending Irish medium schools along with the high demand for and presence of Irish medium schools in my area, I feel it is very important to increase the visibility of the Irish language in the area to be more inclusive of Irish speakers.</p>
Individual	<p>Signage should be bilingual. The UK and NI central and local governments have a requirement to promote the Irish language under the European Charter for Regional and Minority Languages. This is a clear opportunity to do so.</p>
Individual	<p>Conaím sa cheantar comhairle seo. Creidim gur cheart go mbeadh na logainmneacha ar fad a thágann ón Ghaeilge aitheanta go hoifigiúil, faoi mar atá luaite sa Cháirt Eorpach do Theangacha Reigiunacha agus mionlaigh, cáirt atá daingnithe ag Rialtas na Breataine don Ghaeilge anseo ó 2001. Mar sin, tá dualgas idirnáisiúnta ann an Ghaeilge i logainmneacha áitiúla a aithint. Ní athrú nua é seo, ach éileamh a aithníonn bun-fhoinsí dúchasacha na logainmneacha a thágann ón Ghaeilge.</p> <p>Cuireann aitheantas oifigiúil go mór le hathbheochan na teanga, agus leis an 7000+ dalta atá ag foghlaim na teanga gach lá ar Ghaelscoil ó thuaidh.</p>

	Molaim gur cheart an obair seo a dhéanamh agus an t-aitheantas seo a dhéanamh i gcomhar leis an NI Placenames Project, QUB.
Individual	<p>I believe that due attention and prominence be given to the native placenames as part of this ongoing consultation on local government boundaries. The vibrancy and heritage of these ward titles can be found in an example below in Béal Feirste Ballymurphy – Baile Uí Mhurchú – (meaning – the townland that belongs to Murphy.)</p> <p>The Irish Language is the indigenous language of the island of Ireland. It is estimated that over 95% of the placenames that exist in Ireland derive from the Irish Language.</p> <p>I wish to make the case that due attention and importance is given to the native versions of placenames and due consideration is given to their inclusion in this ‘Consultation on the Provisional Recommendations of the Local Government Boundaries Commissioner’</p> <p>Local Governments across the north have begun to step up to the mark in recent years in lieu of their obligations to the Irish Language. There is an opportunity that the boundaries and names of the wards reflect that progress and build upon on it.</p> <p>The European Charter for Regional and Minority Languages was ratified by the British Government on behalf of the Irish Language in 2001. This charter places a particular emphasis on the use of traditional placenames to promote visibility and tolerance by wider society.</p> <p>In fact, there is precedence under Article 11 of the Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1995 for local government to provide bilingual street signage. Due diligence and attention has and should be placed on the native form of the placename.</p> <p>Challenging stereotypes and perceptions that have been carefully fostered over the past few years in relation to the language, is an obligation on everyone in this society and all actors that represent the state. There is a very meaningful opportunity within this consultation to create awareness and tolerance around the language while informing society at large of the heritage and history of our shared spaces.</p> <p>It is therefore my consideration that the possibility of bilingual titles be given to the wards upon the completion of the consultation progress to reflect the everchanging attitudes towards the Irish Language and other minority languages at an international level.</p>
Individual	<p>I am happy that this has come to consultation, as someone employed as a heritage coordinator and lover of local history, I believe that we have an opportunity to give more prominence to native placenames of wards, as part of this ongoing consultation on local government boundaries.</p> <p>Ballymurphy – Baile Uí Mhurchú – (meaning – the townland that belongs to Murphy.)</p>
Individual	I believe that bilingual signage should be included in the naming conventions recommended in the report. The European Charter for

	<p>Minority Languages which was ratified in 2001 by the British Government strongly recommends the protection and promotion of local place names. Especially those which derive from a native language. In 2011 the census at the time reported over 100,000 people in the north can speak Gaeilge. There is a significant section of the population that use Irish on a daily basis and would refer to the place names using the original Irish from which the English, anglicised 'versions' are derived. The original Irish names, as I'm sure you will know, have a far richer semantic meaning than their anglicised counterparts. They connect intrinsically to the landscape to which they refer to, which many local people, and visitors to different areas in this part of Ireland may find they want to understand and decipher. Thank you for taking the time to read this comment.</p>
Individual	<p>As there is no official recognition for placenames. It is estimated that 95% of our placenames here derive directly from Irish! Those names should be protected as a central part of our linguistic landscape.</p> <p>I request official recognition for placenames in the Belfast Area. The European Charter for Regional Minority Languages, ratified by the UK Gov for the Irish here in 2001, strongly recommends the protection and promotion of the local placenames, especially those which derive originally from the local indigenous language.</p> <p>I request the official recognition for placenames in the Belfast Area.</p>
Individual	<p>There is a need for official recognition for place names in the Belfast area.</p>
Individual	<p>In addition, I believe that due attention and prominence be given to the native placenames as part of this ongoing consultation on local government boundaries. The vibrancy and heritage of these ward titles can be found in an example below in Béal Feirste: Ballymurphy – Baile Uí Mhurchú – (meaning – the townland that belongs to Murphy.)</p>
Individual	<p>5.5 I have to date received a representation that both districts and wards should be named in Irish or bilingually with English or in a trilingual naming convention with both English and Ulster Scots. I have not included this in my provisional recommendations; I would invite further representations on this issue in the course of the wider public consultation that is now open.</p> <p>Maidir leis an phointe thuasluaite, bheinn go mór i bhfabhar comharthaíocht dhátheangach fud fad an toghcheantair. Tá sé ríthabachtach go mbeadh aitheantas oifigiúil tugtha do logainmneacha na háite seo.</p> <p>Regarding the above point, I would welcome the introduction of bilingual signage in English and Irish throughout the entire district. It is of the utmost importance that local place-names are officially and publicly recognised in both languages.</p>

<p>Individual</p>	<p>My own view is that where the origins of the name come from Irish or Scots before the names were anglicised then the original name in its Irish or Scots form should be included in bilingual form in the name of the area, by state bodies. State bodies are after all are funded by all of us and we should all be entitled to have our culture respected by such bodies.</p> <p>Indeed, many of these placenames mean absolutely nothing in English. What does Belfast or Antrim or Derry or Armagh or Strabane, or Down or Newry or Ards mean in English?</p> <p>It is only when we go to the origins of the names (in these cases, Irish) that we get to understand why the places were so named in the past.</p> <p>Belfast, for example clearly comes from Béal Feirste, Antrim from Aontroim, Derry from Doire, Armagh from Ard Mhacha, Strabane from An Strath Bán, Down from Dún, Newry from lúr CinnTrá (an lúraigh), Ards from Aird, etc.</p> <p>If a name has no clear Irish or Scots origin then it seems to be that it is a bit artificial to try to create a version of that name which never existed in current or historical normal parlance. However, where there is or has been a use of alternate (from English) versions of a placename in normal day parlance then that version should be accepted as legitimate, as reflective of the cultural diversity in our local communities, if we are really serious about inclusion. In the case of Derry for example, it seems to me that the name should be Derry/Doire.</p> <p>The name Belfast means nothing in English although it is obviously used today. The original name was Béal Feirste which clearly has a meaning (mouth of the Farset/sandbank) which reflects the geography of the place to original inhabitants. Béal Feirste is also a name still widely used in Belfast and throughout Ireland. The name should therefore be Belfast/Béal Ferste.</p>
<p>Individual</p>	<p>I believe a bilingual (Irish/English) naming convention should be included in the report. 2001 European Charter ratified by British Gov recommend protection and promotion of local place names especially those from a native language. Original Irish names have a far more integral connection with the local area and environment. Local people and visitors to the area in this part of Ireland may seek to investigate them further and engage more with Gaeilge. Thank you for taking the time to read this comment.</p>
<p>Individual</p>	<p>No, I would prefer if Belfast was named bi-lingualy (Irish, English). As a parent raising my children in Irish I would deeply appreciate if you could recommend that place names that derive from Irish are visible. It would be great to see more Irish and awareness around place names and this is a great opportunity to do so.</p> <p>This is really important to us as a family and hope you understand the difference this makes to us as community of speakers who are doing our best to revive the language.</p>

Individual	The vast majority of our placenames derive from the ancient Irish language. It gives meaning to where we live and the history that has shaped this place. It offers a glimpse into the past and informs about the nature of the area in which we live. For too long this topography has remained hidden, there is an onus to bring back the Irish placenames to provide protection to these names in the future and to facilitate the transition to a more tolerant and diverse society where the native language is respected by all.
Individual	I would like to see traditional Placenames protected and displayed as part of our linguistic landscape.
Individual	<p>I believe that the legal name of the district should be in both Irish and English. Irish language is the indigenous language that gave its name to most of the towns, townlands of the area. The use of Irish gives meaning to the Anglicized form of these place-names including the name of the district itself.</p> <p>The names of over 95% of the towns and townlands in all of the districts originate in Irish and any resistance towards the use of the Irish language in the legal name of the districts is completely irrational.</p> <p>There is a real need to address the ignorant and often bigoted objection to the use of the Irish language signage or use within our society. Those who object to the use of or visibility of Irish on the basis that this is something that belongs to Irish Republicanism is simply propagating their own misconceptions.</p> <p>The Irish language belongs to us all and the sooner it is promoted through Government and public-sector policies, including adopting the official Irish names of the Councils, the sooner it will be disassociated with Irish Republicanism in the minds of those who are too ignorant or bigoted to accept the validity of the Irish language to exist in the public eye.</p>
Alliance Party of Northern Ireland	<p>The proposed changes to the boundary between Bloomfield and Knock wards makes the boundary between Titanic and Ormiston DEAs more complicated. For clarity, the boundary should remain at North Road. This could be achieved by keeping Kerrsland Drive and Parade in Knock ward as well as both including both sides of Trolland Drive. These changes clarify the boundary as the Kerrsland are off the section of the Newtownards Road currently in Ormiston DEA.</p> <p>Additionally, the proposed changes to the boundary between Ravenhill and Ormeau wards again removes a clear line of demarcation. The boundary remaining on the Ravenhill Road gives a clear boundary line between the DEAs of Botanic and Lisnasharragh.</p> <p>An additional layer on the map showing DEA boundaries would be extremely useful for political parties. It would make the impact of any changes more accessible.</p>
Individual	Irish should be included and official recognition should be given to the place names in Belfast and the local areas

	There should be official recognition for place names within the Belfast and in my local area within the falls road, Beechmount and Springfield road areas
Individual	I think that there should be official recognition for Irish place names particularly given the large number of Irish medium schools within the area. People should have the right to see their language on the names of electoral wards. The European Charter for Regional or Minority Languages places particular emphasis on the importance of minority language visibility. It was a source of much frustration that the Commissioner's original recommendations omitted the original Irish forms of the electoral wards and districts. I would be extremely grateful if this view could be taken into account in this consultation and in future recommendations.

Full written submissions received and available in full at Section Eight: Appendices C&D

Received 17th September 2021 – Submission from Belfast City Council

Received 21st September 2021 – Submission from Social Democratic and Labour Party

Part Two: **Oral Submissions at Public Hearing** (held on 5th October 2021)

Sinn Fein Representatives:

- 1) Support for Forestside Retail Park to be included in the Belfast District boundary area;
- 2) Supportive of the recommended 60 wards and the given adjustments;
- 3) Query that the Electoral Office is going to engage in a Polling Station Scheme to consider the distance in which people have to walk, cycle or drive to some of the polling stations; and
- 4) Support to establish a mechanism for bilingual/trilingual place names to include Irish/other languages in the naming of districts and wards.

Belfast City Council Representatives:

- 1) Request that Forestside Retail Park which currently sits within the Lisburn and Castlereagh District, be brought into the District of Belfast City; and
- 2) Extend the existing district boundary line at the Harbour to include a current and planned extension.

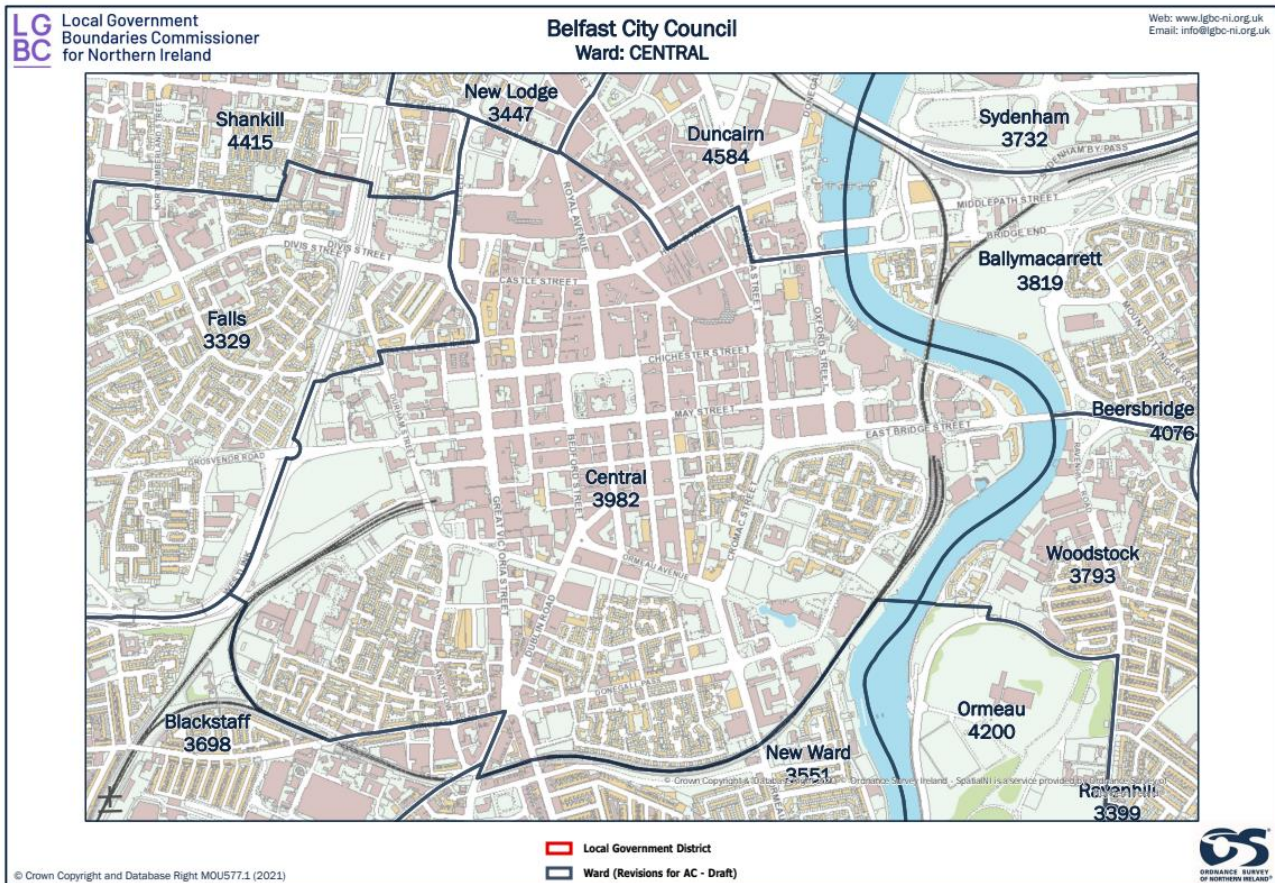
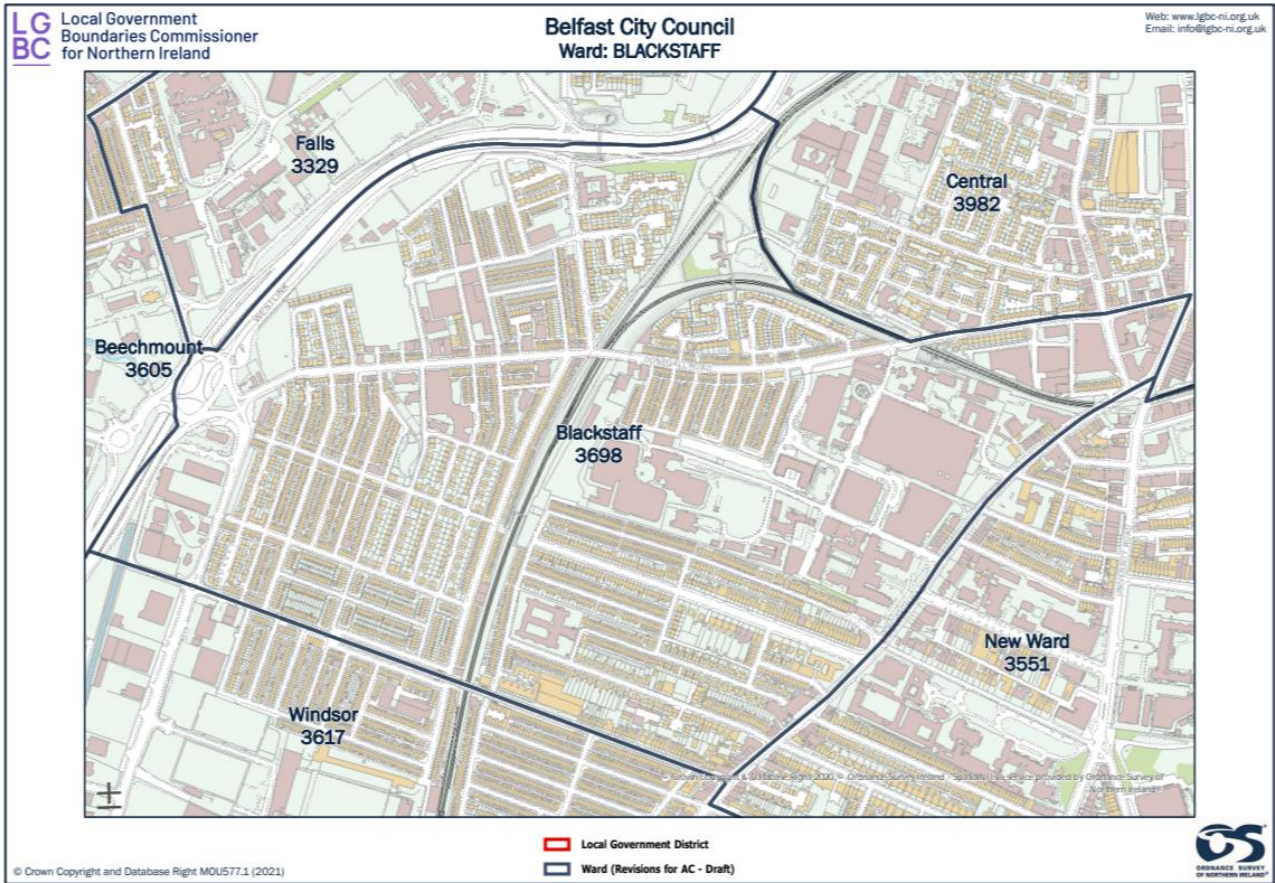
Social Democratic and Labour Party Representatives:

- 1) Proposal to reassess the ward boundary changes within Balmoral and Botanic DEA; and
- 2) Consideration of the Glencreagh Road area and consideration for the transfer of Drumkeen Retail Park into the Belfast District.

Conradh na Gaeilge Representative:

- 1) Request that as per international law, correct forms of place names that derive from Irish and other languages such as Scots should be legally recognised;
and
- 2) Request that the bilingual version of place names of wards or local councils are used and are visible.

Section Eight: Appendices A 61 ward model (from Page 9 - Issue 1)





Local Government District
Ward (Revisions for AC - Draft)



Local Government District
Ward (Revisions for AC - Draft)

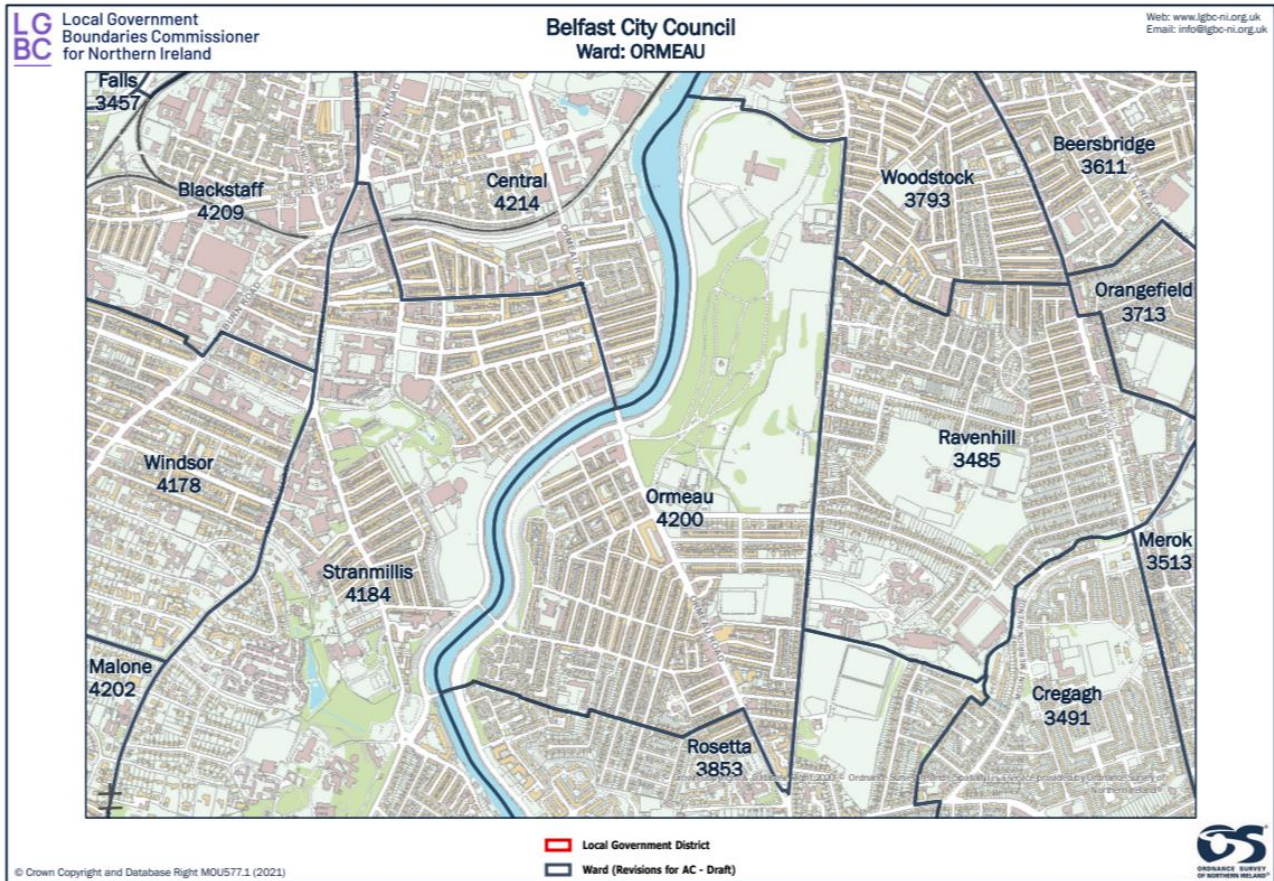




Local Government District
Ward (Revisions for AC - Draft)



Section Eight: **Appendices B** (from Page 9 – Issue 1 & Issue 2 – Solution A)

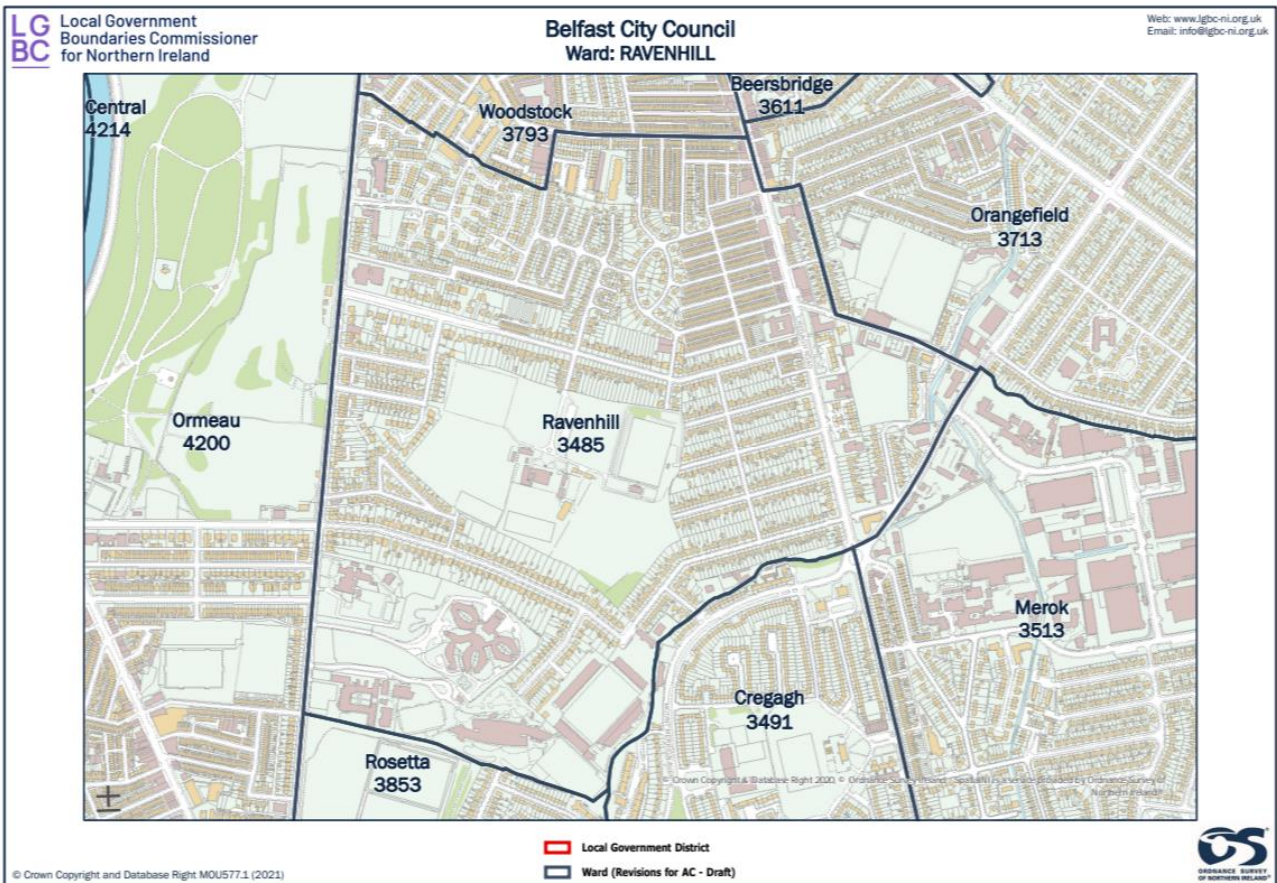
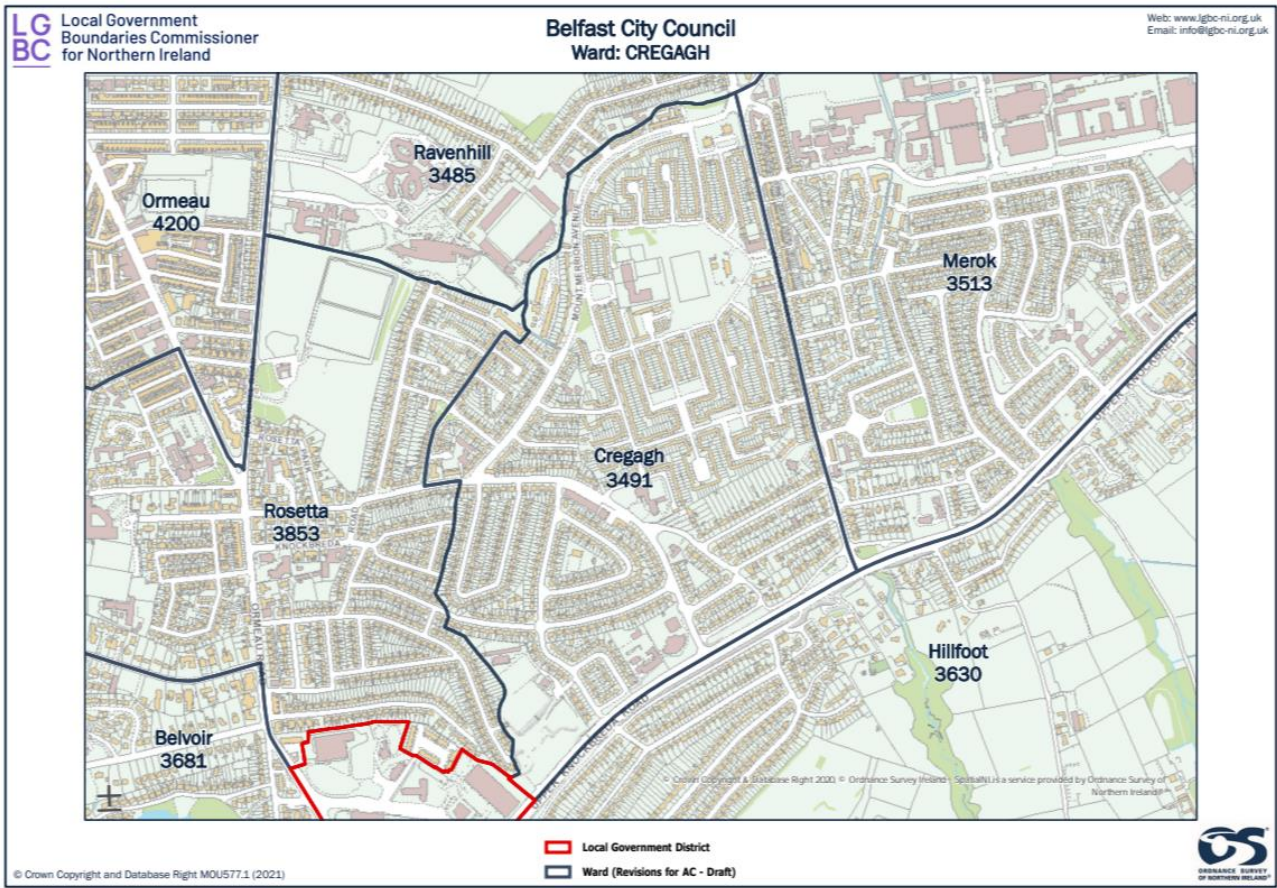


- 8.1 The above Ormeau ward map is based on the 61 ward model, if accepted.
- 8.2 The above Ormeau ward map is also relevant to the 60 ward model with revisions as a result of the submissions received that requested an alternative to moving parts of Ormeau ward into the Ravenhill ward at Park Road, North Parade and South Parade, thus above map is an alternative which moves some electorate from Cregagh ward to Ravenhill ward instead.

As per Page 9 of this report:

- 8.3 Solution (a) 61 ward model - Ravenhill reverts to the current ward boundary, as prior to this review, however with a small change at the boundary between Ormeau and Rosetta (in Hampton Drive) as required to balance the electorate count.
- 8.4 Solution (b) If additional ward recommendation is not approved, then the SDLP proposal is still accepted, and thus the boundary between Ormeau and Ravenhill reverts back to the current ward boundary, as prior to this review, but this means Ravenhill still needs additional electors which is achieved by moving the boundary between Cregagh and Ravenhill, using the stream at the back of the houses at Onslow Parade as the real-world feature for the boundary to follow (these changes are shown in the two ward maps below):

Appendices B (from Page 9 – Issue 2 – Solution B)



Section Eight: **Appendices C**

BELFAST CITY COUNCIL - 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 2 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	69.6	30.4	0.0	0.0	0.0
0-10 mins	84.3	15.6	0.1	0.0	0.0
0-15 mins	74.4	19.5	4.8	1.1	0.2
0-20 mins	62.7	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 4 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 note 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 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 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 do 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.

On behalf of Belfast City Council

September 2021

Section Eight: Appendices D

South Belfast SDLP Consultation Response regarding the Local Government Boundaries Commissioner's Provisional Recommendations

This submission to the Local Government Boundaries Commissioner (the Commissioner) is on behalf of the Social Democratic and Labour Party in South Belfast.

May we take this opportunity to state that we recognise the difficult and delicate task the Commissioner has been given and commend her and her colleagues for the diligent manner in which they have approached this work. We do however respectfully come to different conclusions on a number of the suggestions and so have laid out some proposals we feel would be better suited to South Belfast, factoring in the broad range of statutory and desirable parameters.

We acknowledge that a degree of interpretation has to be made in the assignment of *readily identifiable* boundaries, that is, the importance and impact of man-made or natural physical features.

We note the fact that legislation has determined that all wards should be composed of a broadly equal number of electors that is within a 10% tolerance of the district average.

The district average for Belfast is 3,837, therefore a 10% tolerance is +/- 383.7 which gives us a range of between 3,453 and 4,221 (rounded).

Balmoral

Ward	Existing	Proposed	Comparison to DAv
Belvoir	3681	3681	95.9%
Finaghy	3539	4217	109.9%
Malone	3754	4202	109.5%
Musgrave	3705	4219	109.9%
Upper Malone	3707	4218	109.9%
		Total: 20537	Electors per Cllr: 4107

Botanic

Ward	Existing	Proposed	Comparison to DAv
Blackstaff	4398	4209	109.6%
Central	5282	4214	109.8%
Ormeau	4200	3911	101.9%
Stranmillis	4391	4184	109.0%
Windsor	4865	4178	108.8%
		Total: 20696	Electors per Cllr: 4139

While we accept that each proposal for the above wards is within the accepted range, we would also highlight that four of the five redrawn wards generally within the extant Balmoral DEA – Finaghy, Malone, Upper Malone and Musgrave – and four of the five

wards generally within the extant Botanic DEA – Central, Blackstaff, Stranmillis and Windsor – are all within close proximity to the upper threshold, and therefore even after the review there would still be a significant democratic deficit and under-representation in these areas, not to mention little capacity for natural populations growth. We would suggest a much smaller transfer of electors between the above wards and the creation of a new ward to go alongside Central, Blackstaff, Windsor, Ormeau and Stranmillis and a new ward to go alongside Belvoir, Finaghy, Malone, Musgrave and Upper Malone to organically accommodate the changing nature of these areas, as is permitted in the legislation.

While we appreciate the need to satisfy the legislative requirement for each ward within the district of Belfast to have substantially the same number of electors, we have grave concerns that the plans to decimate a number of the wards within the existing Botanic DEA in particular will have a detrimental impact on their residents and the city more generally; the plans do not seem to take into account the unique character of these wards, the sense of community within them, or their diverse make-up, and therefore will have a negative impact if implemented.

The wards that make up the existing Botanic DEA collectively had the second lowest turnout of any in Belfast in 2019 – 44.76% – a full eight percentage points below the next lowest set of wards. This is based on the existing ward boundaries. However, the proposals will remove many of those areas from within these wards which traditionally have a higher turnout, meaning that turnout in the reshaped wards under the proposed boundaries would collapse, creating a substantial democratic deficit and effectively resulting in ‘ghost constituencies’ characterised by vast tracts of largely unpopulated areas such as the city centre. Added to this is the fact that increasingly we are seeing plans being approved and implemented for student accommodation in the most urban parts of several of the wards such as Blackstaff and Central which may overinflate the numbers of registered voters, but which will not result in a healthy turnout. It will also lead to a paucity of democratic engagement given the skewing of the wards towards this type of accommodation.

We accept that there may be a need to adjust some aspects of a number of the wards within the existing Botanic DEA, but feel that the nature of how this is proposed takes no account of the diverse communities within the five wards that currently make up Botanic, is focused primarily on the southern parts of Stranmillis and Windsor so therefore lops off entire neighbourhoods of a similar cohesive nature rather than being done in a way which is equitable across the wards, and will effectively create a shells of wards with isolated and unconnected neighbourhoods, skewing the wards away from the current age, race, religious, economic and social diversity that they currently enjoy. Indeed, collectively Central, Blackstaff, Windsor, Ormeau and Stranmillis form the most diverse area on the island of Ireland – this is at risk under these plans.

In particular, we believe that too much of the Windsor and Stranmillis wards are being transferred to Malone – while we accept that some move across may be required and support this, the wholesale lifting of entire sections of this part of the community across is too focused on this one area – to cleave the patch between Hillside Drive and Deramore Park South, and the area around the Marlborough Park South, Central and North, focuses too much change on one specific area of Stranmillis and Windsor, and will result in a seismic impact on the demographic nature of these wards, not to mention on the residents

of these areas themselves. For example, the Holyland area which has no link with Stranmillis, is being brought within the ward to reduce the number of electors within the current Central ward, while parts of Stranmillis itself are being taken out of the ward altogether, unnecessarily splitting natural communities. Likewise, parts of Blackstaff are being moved into Windsor, only for communities at the south end of Windsor to be cut off from neighbouring streets and moved into Malone.

With regard to the proposed transfer of electors from Ormeau to Ravenhill, the location of this transfer is not appropriate – to carve up streets such as Park Road, North Parade, South Parade and the Ravenhill Road will cause confusion in those communities, split streets apart and create an issue of streets being arbitrarily divided between wards, especially as it will mean one part of a street falling under East Belfast for council administrative purposes, and another falling under South Belfast. If electors need to be transferred from Ormeau, we believe this could be done in a much less detrimental way in locations such as the northerly sections of Ailesbury Road and Florenceville Avenue (where the anomaly of the ward boundary between Ormeau and Rosetta running up the middle of the road could actually be rectified) or in the streets around Hampton Drive, which is a discrete community already contiguous to the Rosetta ward. Streets such as Knockeden Park and adjacent streets could then be moved from Rosetta to Ravenhill to satisfy the requirements for the number of electors in those respective wards.

Rather than responding to the population growth of Central, Blackstaff, Windsor, Ormeau and Stranmillis, which will largely be focused on student and apartment living in the urban parts of the northernmost areas of the wards around the city centre and university area, by jettisoning residential areas with diverse communities, which would ultimately result in wards being starved of the character that they currently enjoy and will see a collapse in democratic engagement and turnout, we would advocate for a much smaller transfer of electors, and for the location of transfers to be reconsidered, and the creation of a new ward to go alongside Central, Blackstaff, Windsor, Ormeau and Stranmillis within the general area of the extant Botanic DEA and a new ward to go alongside Belvoir, Finaghy, Malone, Musgrave and Upper Malone within the general area of the extant Balmoral DEA to organically accommodate the changing nature of these areas and keep communities together, as is permitted in the legislation.

While the overriding purpose of this review is to ensure that there is equality of representation for electors, to do this in a way which is purely focused on numbers without taking into account the character of the communities which make up a Central, Blackstaff, Windsor, Ormeau and Stranmillis and the unique set of circumstances within them (a combination of a city centre, inner-city communities and suburbs, alongside the increase in student and apartment-based accommodation) risks creating a situation which will damage these areas and their ability to make their voices heard within the democratic structures of the city.

Social Democratic and Labour Party

21st September 2021