

**BELFAST CITY COUNCIL**

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**SUBMISSION**

**RE**

**LOCAL GOVERNMENT BOUNDARIES REVIEW IN  
NORTHERN IRELAND**

**REVISED RECOMMENDATIONS**

**(28 February 2022)**

## **Introduction**

This submission in response to the Local Government Boundary Commissioner's Revised 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.

## **Belfast City Council Response**

### **District Boundary**

#### Galwally Area

The Council would argue that any independent review into the placement of any district boundary line should be based on the Schedule 4, Part III "Rules in accordance which recommendations of a commissioner are to be made", the first of which (Rule 14) is:

"Regard shall be had to the desirability of determining district and ward boundaries which are readily identifiable".

The Council would reiterate the points made in its submission to the Provisional Recommendations, including that those features which the Local Government Boundary Commissioner correctly determined in 2008 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 recognise that all of the extant district and ward boundaries for all 11 councils, including those in relation to Belfast, were mandated by a political process of the NI Assembly following the last review in 2008/9. The Council would argue that this fact may not exempt any of the boundaries from future review as this would negate the requirement for any future review and would render the rules set out in Schedule 4, Part III of The Local Government (Boundaries) (Northern Ireland) Order 2006 redundant.

The Council would therefore recommend again that the Commissioner refers to the principles upon which the 2008 Final Recommendations were made and the Schedule 4, Part III Rules including the first rule which places prominence on the desirability of determining district boundaries which are readily identifiable.

The reason put forth by the Council therefore appeals directly to the first rule in Schedule 4, Part III which defines the rules in accordance which a

Commissioner will make recommendations, therefore ensuring that such a reason is not only valid but is a material consideration.

Any argument that Belfast's district boundary was "mandated by a political process" or reference to "the fact that the boundary was a decision made by the NI Assembly which is historically agreed" will equally apply to all district boundaries which are subject to the review. As such, the Council do not agree that this is a valid argument for determining that such reasons as those which directly relate to legislated Rules such as Schedule 4, Part III (14) are not compelling.

The Council would note that no other argument, other than previous political agreement has been presented against the suggested change to the district boundary.

#### Harbour Area

The Council welcomes the revised recommendation in respect of the Harbour area and the proposed suggest that the district line should be amended to encompass existing and future development of the Harbour estate.

**REDACTED**

City Solicitor

On behalf of Belfast City Council  
28 February 2022