



Civic Headquarters  
Lagan Valley Island  
Lisburn BT27 4RL  
Tel: 028 9250 9250  
[www.lisburncastlereagh.gov.uk](http://www.lisburncastlereagh.gov.uk)



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**BY EMAIL**

[Sarah.Havlin@lgbc-ni.org.uk](mailto:Sarah.Havlin@lgbc-ni.org.uk)

Ms Sarah Havlin  
Local Boundary Boundary Commissioner  
Office of the Local Government Boundaries Commissioner  
C/O Local Government Division,  
Department for Communities,  
Causeway Exchange  
1-7 Bedford Street  
BELFAST BT2 7E

Dear Commissioner

**PROVISIONAL LOCAL GOVERNMENT BOUNDARY REVIEW**

Thank you for accepting our deputation on Friday 1<sup>st</sup> October at Lagan Valley Island. Our submission, including this written submission, follows on from our initial correspondence and subsequent consideration of your published provisional report. On this occasion we wish to address the Belfast City Council submission as published on your website relating to Upper Galwally.

We believe the position being put forward by Belfast City Council is fundamentally flawed in both reasoning and methodology. In addition we believe it is outside the scope of your review as it appears to merely address a rates intake argument - a position that is incongruous with the purpose of the review as well as the settled legal position of the NI Assembly in respect of Local Government Boundaries and subsequent rates settlement. The suggestion to apply an alternative formula to one particular area so as to contrive a particular outcome goes against the objective of your review. It is also noted that no attempt has been made to understand the impact that the transfer of Upper Galwally will have on the plebiscite for each of the Council areas.

The proposition being put by Belfast City Council only addresses one area of the settled boundary and therefore would appear to be unbalanced insofar as it does not revisit the other wards that were considered by the Assembly when opting for the boundary recommendations in 2008. The net effect of the proposition being postulated would cause this Council a 3.3% rise in the district rate and therefore disproportionately disadvantages a large part of the greater Belfast Metropolitan Area which falls within our Council Boundary. Both businesses and residents would be subject to a significant increase in their rates assessment by transferring into the Belfast City Council boundary. Following the harmonisation process post Local Government Reform, by adopting the Belfast position would result in such a re-harmonisation process to be reintroduced, causing unnecessary uncertainty for residents and businesses alike.

Belfast City Council's submission primarily argues a need on the basis of prevailing social deprivation wards within their boundary, yet we note that they do not qualify for the rates correction settlement. Thus the established formula for determining the regional correction for disadvantaged areas would suggest that no additional corrections are required at this time. Hence, to relocate the residents and businesses impacted in Upper Galwally within the Belfast City Council boundary does not fully align with a more holistic approach to prevailing social deprivation in either Belfast or other parts of Northern Ireland.

Both Councils are engaged in a two stage Area Plan review which is ultimately designed to create a new land use policy for adoption. The Upper Galwally area in question is considered as a district settlement and has been taken into consideration within our Council's Draft Plan Strategy. By altering the boundary at this stage would involve a review of the respective Council's growth strategies and emerging Area Plans thus causing a significant delay in this already elongated process.

In giving consideration to the provisional recommendations at our Council meeting in August, Members noted your recommendation to retain the settled boundary for the Council and the focus throughout your report on ensuring balanced democratic mandates. Should there be a different focus, such as the respective rates base, we would ask that the NI Executive provides for a further time period and analysis of balancing of rates. In addition, we would request that the Assembly provides for your office additional resources and time for such an analysis.

I have no doubt your office will have noted the political cross party support for retaining the established local government boundary and the opposition to the Belfast City Council submission.

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In conclusion, we believe the settled boundary ought not to be altered without a more comprehensive analysis of social demographic and economic need.

Yours sincerely

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