



SOUTH BELFAST PARTNERSHIP BOARD

Philip Stinson
Strategic Planning Division
Millennium House
2nd Floor
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Belfast
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28 January 2013

Dear Mr Stinson

RE: Re-development of Windsor Park, Planning Application (Z/2012/1359/F)

I write to you in response to the Planning Application submitted by the Irish Football Association (IFA) in relation to the re-development of Windsor Park. These comments have been prepared by the South Belfast Partnership Board in consultation with a number of local community groups and youth work service providers in South Belfast. In particular, views have been captured and input into the response from a number of local community structures, including:

- **South Belfast Partnership Board** – A Board which brings together all sectors – community, statutory, political and private – to strengthen and better target the efforts being made by the community, the private sector and the Government to tackle in partnership the economic, social and environmental problems which affect people in the most disadvantaged areas of South Belfast;
- **South Belfast Community Support Group** – A group consisting of a number of representatives from community and voluntary groups that operate in South Belfast which seeks to represent the collective views of the communities they represent;
- **South West Belfast Neighbourhood Partnership** – A Partnership that brings together all sectors to facilitate the implementation of the Government's Neighbourhood Renewal Programme in the South West Belfast area, which covers Sandy Row, the Village, the mid-Donagall Road and Roden Street.

Whilst we welcome proposals to improve Windsor Park and recognise that it is a development that should bring significant economic and social benefits to the surrounding area and the City as a whole, we have concerns that implications for the amenity for local residents across South Belfast have not been adequately addressed. We believe the proposed design is excellent and will transform the stadium into an iconic building that helps to raise the image of the area, but we would like to highlight a number of significant concerns and issues that need to be adequately considered and addressed as part of the planning process, to ensure that the impact of the development on the surrounding neighbourhoods is minimised.

Firstly, on a point of process, we are disappointed that the IFA and their consultants have chosen as part of the pre-application consultation process to consult only with some local community groups and the West Belfast Partnership Board. Although the South Belfast Partnership's Urban Regeneration Officer attended a number of the consultation events, the Board would have welcomed the opportunity to discuss the proposals directly with the IFA and/or consultants in the run up to the

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submission of the planning application.

Clearly, the proposed development at Windsor Park, if not well planned and managed, has the potential to cause significant negative impacts on South Belfast for a long time to come, including the amenity of residents far beyond the Village and immediate surrounding area. For example, during matches at present the problems of parking, traffic congestion, anti-social behaviour, such as litter, on street drinking and noise extends up the Lisburn Road as far as Adelaide Park and Cadogan Park. With the new modern facilities and increased capacity, the local resident's in these areas have concerns that these problems will only get worse.

It would appear that, despite the evidence supplied as part of planning application, the IFA has failed to enter into 'genuine consultation' with the broader residential and business communities in South Belfast. The engagement has concentrated on too narrow a geographic area and the interventions put forward have been designed to address specific issues raised by very local residents within that small catchment area. Given the scale and profile of the development within the wider area, we believe that some of the interventions proposed, whilst being excellent in terms of addressing local community needs immediately adjacent to the development, have the potential to cause displacement of the problems to an event broader policy. This is very concerning for many residents further afield from the stadium and means that we cannot support the development as currently proposed, without giving further consideration to the wider impacts and potential initiatives to mitigate against the broader effects of the expansion.

This is a particularly important issue given that Windsor Park falls within the geographic remit of the South Belfast Partnership, rather than West Belfast Partnership, and in the light of our on-going work with the Council, Department for Social Development, Planning Service and Road Service representatives around an overarching Masterplan for the 'South West Gateway'. This Masterplanning process spans both South and West Belfast from Windsor Park to Casement Park, following recognition that greater linkages could be fostered between South and West Belfast and that the expansion of both Windsor Park and Casement Park will have significant implications for the entire area in terms of parking arrangements and accessibility.

We are therefore concerned that there is no specific mention within the Design and Access Statement of parking arrangements within the surrounding area, despite a strong response coming back from local residents during the pre-application consultation highlighting the significant problems that already exist associated with congestion and lack of car parking. These problems are likely to be exacerbated by an expansion. This is also a risk that problems could be compounded by the shortage of parking at Casement Park, as some supporters may choose – in fact may be forced – to park in the Boucher Road area on match days as there is insufficient parking closer to Casement Park.

There is a sense that Boucher Road is being considered as a solution to the pending problems with transport and parking associated with the planned re-development of Casement Park, and we believe it is remiss that the IFA have not given greater consideration to the cumulative impact of traffic and parking from the two stadia developments combined. Whilst, we understand that this may be difficult to achieve as part of the planning process, we would urge Planning Service, due to the significance of these two major projects, to require greater consideration of these issues and more genuine, wider consultation as part of the planning process. To date, we feel the consultation undertaken is no more than a tick the box PR exercise to satisfy Planning Service requirements and we would suggest that Planning Service need to give greater consideration to the appropriateness of the consultation that has taken place to date.

Whilst some of these transport matters are addressed as part of the Transport Assessment, there still appears to be no consideration of the cumulative impact of the expansion of the two stadia – Windsor Park and Casement Park – on the wider Boucher Road area. We believe this should be completed as part of the planning process. We would urge the Department to ensure that any planning permissions granted in relation to these developments come with conditions ensuring that the IFA and GAA work together look more closely at access to the area, not just the stadium itself, as well as

the parking arrangements in the wider surrounding area.

That said, we do recognise that some steps have been made as part of the planning application process to begin to address some of these issues. In particular, we welcome the following commitments from the IFA:

- The establishment of a Community Forum, including local residents, business communities and political representatives, to discuss and address any problems that arise;
- Joint marketing between the IFA and Translink and a £15,000 per year public transport fund to encourage greater use of public transport to access the stadium;
- Provision of stewards at the accesses to local residential streets, including informing the residents of stewarding arrangements prior to a match;
- The provision of an enforced 'resident's only parking' arrangement in the neighbouring residential streets – it is noted that this should be at no cost to the residents; and
- The provision of 'Park and Walk' or 'Park and Ride' facilities at the Boucher Road playing fields.

It is vital that these commitments are a formal condition of any future planning consents, to ensure that the promises made by the IFA and construction company will be delivered effectively once the planning application has been approved and construction begins. We would ask that the planning process secures a formal, legal commitment, from the IFA to delivering these promises.

In addition to these comments regarding traffic and parking and the impact on local residential communities, we would re-iterate a number of points that have been raised by local communities during the consultation process to date and would ask that the Department ensure that these matters have been adequately considered and addressed:

- The need to ensure local **employment opportunities**. We note that the consultation report suggests that the IFA's contractor will be required to deliver a number of initiatives with regards to local employment and community engagement through the construction phase. However, there is no commitment to local employment following construction.

There is concern that the clauses as described do not ensure that the jobs and apprenticeships will be targeted at those in the deprived communities immediately adjacent to the stadium, but rather to sectors of society generally in the greatest need. There is evidence in the past of external contractors meeting these obligations by providing apprenticeships/placements to people from other areas of the UK, therefore providing no direct benefit in terms of employment to the local communities.

- The need to ensure that existing **community facilities**, such as the Olympia Leisure Centre and Community Centre are retained and accessible. Again, it is frustrating for local communities that the redevelopment of Windsor Park and the potential regeneration of the adjacent Council facilities are being taken forward in isolation, thus missing an opportunity to look at how all these facilities work together.

That said, we do welcome the inclusion of a new community building and facilities as part of the proposed stadium development, as long as these complement the existing or new facilities provided nearby by the Council. It is also important that any new community services are, and continue to be, affordable to local residents and community/voluntary organisations.

- Alongside the parking problems outlined above, there are also existing problems associated with **anti-social behaviour** and littering. Residents regularly experience abuse and damage to their properties on match days and would welcome any support from the IFA in addressing this.

- Alongside the issues outlined above in relation to **encouraging public transport use**, the residents are concerned that some local bus services are currently suspended when matches are played. This could serve to both minimise the opportunities for access via means of public transport, but also restricts movement out of the area by local residents during matches. Some residents have suggested that a free bus service from the City Centre to the stadium could help improve accessibility, but improvements to the local rail halt and station could also help in this regard.

We trust that you find these comments useful and look forward to seeing how they help shape the final development. We would welcome the opportunity to discuss any of the matters raised within this response with the Department, so please don't hesitate to contact my colleague Martyn Smithson on 02890 244 070 or martyn.smithson@southbelfast.org if you would like any further information or clarity in relation to any of our comments.

Yours sincerely

Briege Arthurs
Chief Executive, South Belfast Partnership Board