

11 November 2008

Mr Richard H Mackenzie CB
Local Government Boundaries Commissioner
Forestview
Purdy's Lane
BELFAST BT8 7AR

Dear Commissioner

RESPONSE BY CASTLEREAGH BOROUGH COUNCIL TO THE LOCAL GOVERNMENT BOUNDARIES COMMISSIONER'S REPORT 'REVIEW OF THE NORTHERN IRELAND LOCAL GOVERNMENT BOUNDARIES – PROVISIONAL RECOMMENDATIONS – SEPTEMBER 2008'

Overall Boundary

1. The Council wishes to strongly object to the transfer of any part of the existing Castlereagh Borough Council area to Belfast City Council. The Commissioner's argument that significant areas of development lie within the urban form of the city and should therefore be brought within the boundary of the new Belfast local government district is seriously flawed, highly selective and without proper justification. It is noted with considerable concern that despite this assertion and the comment that Belfast 'enjoys a natural setting between surrounding hills and a sea lough', that the Commissioner has ignored those significant parts of the current Newtownabbey Borough Council that fall within this description, particularly those parts sweeping down to Belfast Lough (i.e. the wards of Valley, Whitehouse, O'Neill and Rathcoole amongst others which may well fall within this definition).
2. The proposed areas to be transferred from Castlereagh contain mainly post 1950's housing, which were part of the old Castlereagh Rural District Council area prior to the 1973 local government reorganisation and has remained part of Castlereagh Borough Council since that reorganisation. There is, therefore, no rational for changing the boundary at this time.
3. The Council has invested heavily in these areas, particularly in the field of community services, the residents have enjoyed considerably lower rates than Belfast residents, and the majority of citizens identify themselves with their existing local council.
4. In many other areas of the United Kingdom similar situations pertain, whereby there is a city council and a number of metropolitan councils surrounding the city. Indeed in previous local government reorganisations in Scotland, the city council in Glasgow got smaller, not larger.

5. The Boundaries Commissioner has missed an opportunity to create 11 new councils of approximately equal size. By creating a Belfast City Council which is considerably larger than the other councils, it perpetuates the current situation whereby Belfast considers itself 'different' and has to put forward its own position on most matters, rather than an informed local government position covering all councils as articulated by the Northern Ireland Local Government Association. Indeed a large Belfast City Council does not sit well with a devolved administration in Northern Ireland, given that its size is out of proportion to both the Northern Ireland Assembly and the other councils. It creates a '3-tier' system within Northern Ireland, rather than 2 tiers.

6. The Council is strongly of the view that the existing Belfast City Council boundary should be reduced, not increased, to create 11 councils of approximately equal size. This could be achieved by transferring parts of Upper Malone and Finaghy (which geographically fall within the Lagan Valley Regional Park) and everything south of the Outer Ring Road (the areas of Knock, Cherryvalley, Shandon and Stormont were previously part of the pre-1973 Castlereagh Rural District Council) to the new Lisburn City and Castlereagh District Council. This would simplify the existing boundaries and make them more geographically sensible when viewed on a map.

7. The proposed boundaries give the new Lisburn City and Castlereagh District Council the second lowest ward average population of the 11 new councils. Belfast City will have a much higher ward average than Lisburn/Castlereagh (3173 as opposed to 2084). Amending the proposed boundaries to increase the size of the new Lisburn City and Castlereagh District Council will help create a more even distribution of ward averages.

8. Castlereagh residents have taken the necessary steps to ensure compliance with the Northern Ireland Landfill Allowances (NILAS), by adopting the Council's various waste reduction and recycling schemes. As a result Castlereagh is now the best performing council in Northern Ireland with regard to NILAS. The boundary proposals mean that a significant proportion (around 29,000 residents in 11,450 households) will be transferred to Belfast City which operates a different waste management/recycling scheme and which is not performing nearly as well. Unlike Castlereagh and Lisburn, Belfast is in a much weaker position and therefore is unlikely to meet its targets and could be subject to heavy fines, which the transferred Castlereagh residents would have to pay for through their rates. This is unfair given the efforts that both Castlereagh Borough Council and its residents have made to meet the demanding targets set by the Government and is another reason why the territorial integrity of Castlereagh should be maintained.

9. The proposed boundary changes will have considerable wider implications, particularly on the working relationships built up with other Agencies over the years, i.e. the NIHE have a Castlereagh Office coterminous with our existing boundary. This will have a major detrimental effect on the delivery of services within the existing Borough.

Forestside and Upper Galwally

10. Castlereagh Borough Council's principal shopping centre is at Forestside and this mainly serves residents to the south, i.e. Castlereagh. The loss of this area to Belfast City would result in the remaining portion of the Castlereagh area in the new Lisburn City and Castlereagh District Council being deprived of a major shopping centre, whereas Belfast City has numerous such centres. Not only would our Borough be deprived of its flagship shopping centre, but the loss of the rate revenue would have a very serious financial effect on the new Lisburn City and Castlereagh District Council. It would result in the Castlereagh part of the new Council area being considerably poorer (in income terms) than the Lisburn part of the new Council area and has the potential to result in an 'east/west' divide developing within the new Council area. This should be avoided at all costs.

11. Castlereagh Borough Council's existing flagship Council offices are based at Upper Galwally. Belfast City Council has no need for these offices, whereas the new Lisburn City and Castlereagh District Council will need to maintain offices in the east of the area to create a footprint for the delivery of local services. It would be an absolute nonsense and economically unsound and inefficient for officers and vehicles from the new council to be travelling on a daily business from Lisburn to Castlereagh along the Hillhall Road (a narrow and winding country road with frequent accidents and traffic congestion) to deliver services in Castlereagh. Similarly, Castlereagh residents will not wish to travel all the way to Lisburn to avail of Council services. It is generally accepted that the new Council Headquarters will be in Lisburn (given the size and expansion capacity of Lisburn's Civic Centre), but it is essential that the current Castlereagh Civic Offices are retained for local service delivery. The Council therefore objects strongly to the proposed boundary change whereby these offices will be located in the Belfast City area.

Belvoir and Minnowburn (and the parts of Beechill/Newtownbreda which are north of the Outer Ring Road)

12. The Boundary Commissioner stressed the importance of areas such as the Mourne's falling within a single council area to facilitate their management, protection and marketing. He has, however, in this commendable approach overlooked the fact that Belvoir Forest Park, which is the only urban forest in the United Kingdom, is an integral and important part of the Lagan Valley Regional Park, the custodian and employer Council of which is Castlereagh, a responsibility that will transfer to the new Lisburn City and Castlereagh District Council. Changing the boundary to put Belvoir into Belfast means that the Lagan Valley Regional Park staff, who are currently employed by Castlereagh (and who will not transfer to Belfast as the vast majority of the Lagan Valley Regional Park is within the new Lisburn City and Castlereagh District Council area) will be based in another council's area. More importantly the management, protection and marketing of this important regional asset will be fragmented. The Council, therefore strongly opposes the loss of this area to Belfast.

13. The Commissioner in his report contends that the Belfast City boundary should better reflect its setting in the surrounding hills. This is at odds with the proposal to transfer Belvoir and Minnowburn to Belfast. This area does not sit within any hills and, in effect, is geographically physically split from Belfast City's urban area by the major green wedge created by Belvoir Forest and the rural aspect of the River Lagan flowing through it. In this respect the River Lagan is a readily identifiable major boundary. The Belvoir and Minnowburn areas achieve a better geographical fit with the rural aspect of Castlereagh and the rural wedge which stretches through Drumbo to Lisburn. The new boundary also separates Belvoir and Minnowburn from their main recreational area of Hydebank Playing Fields. It is clear that Belvoir and Minnowburn have nothing in common with the urban areas of Belfast City. The council, therefore, respectfully requests that this boundary change be reconsidered in light of this justification.

14. This area also contains the Ramada Hotel at Shaw's Bridge. Belfast has over a dozen major hotels of 4-star class or higher, whereas Castlereagh has only 2 and Lisburn have no major ones. It makes sound economic sense, therefore, for the Ramada Hotel at Shaw's Bridge to remain part of the new Lisburn City and Castlereagh District Council area. Its setting on the edge of the River Lagan and Belvoir Forest Park is integral to the Lagan Valley Regional Park and, as such, the proposed boundaries should reflect this by locating it firmly within our new Council area.

Cregagh and Merok Wards

15. Castlereagh's main industrial and commercial area is sited within the Merok ward (around the area of Alanbrooke Road, Montgomery Road, Prince Regent Road and the Castlereagh Road), which is proposed to transfer to Belfast. This will have a major detrimental effect on the economy of the Castlereagh area. The considerable loss of non-domestic rate income will have a serious financial impact on the new Lisburn City and Castlereagh District Council. It would result in the Castlereagh part of the new Council area being considerably poorer (in income terms) than the Lisburn part of the new Council area and has the potential to result in an 'east/west' divide developing within the new Council area. Belfast has enough industrial/commercial sites without depriving Castlereagh of its main one.

16. The Merok ward also contains Castlereagh's only swimming pool and the Council's garage for its vehicle fleet. It is unjust to remove the swimming pool from Castlereagh and to deprive the new council of such an important social and recreational facility, particularly when Belfast has numerous swimming pools.

17. The Council's garage is essential for the provision of services in the Castlereagh area. As explained earlier, it would be inefficient and uneconomical for vehicles to travel to/from Lisburn to Castlereagh.

18. The residents of the estates in this area, i.e. Cregagh, Downshire and Wynchurch etc., have always been part of Castlereagh, having been part of the old Castlereagh Rural District Council pre-1973. The advantage of being a medium sized council (unlike Belfast) has meant that Castlereagh has been able to invest heavily in these areas. In Cregagh, the recently constructed Cregagh Community Centre and associated sports facilities was a flagship project, being the first joint project between a district council and an education board, to build a new school, a youth centre and a community centre on an **integrated site** at the centre of the local community. Projects such as this have developed a strong community spirit and the residents closely identify themselves with Castlereagh Borough Council. We have 3 community facilities (Cregagh, Clonduff and Downshire) within the space of half a mile. A large council such as Belfast City will not be able to maintain such a

close link/investment in facilities and the proposed boundary changes will have a major detrimental effect on the residents of this area.

Braniel

19. Braniel is a close knit community, with close links with the Council over a long number of years. The council works extremely hard in this area, in close cooperation with the residents and other Agencies. The residents clearly identify themselves with Castlereagh and will be disadvantaged by a move to Belfast. The proposed boundary to the rear of Braniel is unnatural. The existing Outer Ring would make a more clearly defined boundary, which would assist the delivery of services.

Gilnahirk and Tullycarnet

20. The proposed boundary change in this area creates a narrow corridor which will seriously affect the delivery of services and alienate the population from their adjacent neighbours in Dundonald. This should be avoided at all costs. Being south of the Outer Ring it makes more geographical sense for this area to remain within Castlereagh and for the Outer Ring to become the boundary between the two councils, thus clearly delineating the boundary.

21. Tullycarnet is one of the most deprived areas in Northern Ireland (as measured by the Noble indices). The Council has invested heavily in this area in the past, particularly in social and job creation projects. It is unlikely that Belfast as a large and diverse council will be able to maintain this level of investment.

22. The Council has recently completed its multi-million pound Hanwood Centre Project (a social economy project), adjacent to its Tullycarnet Community Centre. The final phase of Hanwood, which includes business units and sports facilities is currently nearing completion. The Hanwood Project is integral to the Council's adjacent development of the Dundonald Leisure Park, which has a multi-screen cinema and 12 restaurants currently nearing completion. The proposed boundary runs between the Hanwood Centre building and its associated business units and sports facilities, effectively cutting the site in two, and also cutting the Hanwood Centre off from the adjacent Dundonald Leisure Park. As the Hanwood Company is a subsidiary of Castlereagh Borough Council and staffed by council employees, this boundary change will have a serious and detrimental effect on the running of Hanwood as an integrated project. It would be nonsensical to split this integrated development between two separate councils and it is imperative, therefore, that the proposed boundary change is reviewed to ensure that the Hanwood Centre and the population it serves in Gilnahirk and Tullycarnet remain part of Castlereagh.

Conclusions

23. Castlereagh (in terms of annual published performance figures) is one of the top performing councils in Northern Ireland, with an unequalled record of annually setting the lowest district domestic rates. Despite our low rate base, the Council provides unequalled services. We are the highest performing council in waste management, had the lowest absentee record of any council in the last published figures, are the only council in Ireland to provide an ice rink (an international standard facility), the only council in Ireland to operate a USGA standard golf course and we have major sports facilities in each of our 4 electoral areas. According to the IFA, our Billy Neill MBE Centre of Soccer Excellence is the best municipal football facility in Ireland. Additionally, the Council (amongst other facilities) operates a 30-lane 10-pin bowling facility, which was the first of its kind in Ireland. Our facilities, such as the ice rink and bowling facility have held World, European and UK championships. Given the Council's long record of high performance it is considerably anomalous for the Borough to be effectively carved in two by the boundary proposals.

24. Over the years of its existence the council has developed a strong ethos of providing value for money services for its residents and has an unequalled record of doing so. Its residents strongly identify themselves with Castlereagh, have a strong community ethos and do not want to become 'a small cog in a big wheel' as part of Belfast City Council. All recent research has shown that local communities closely identify themselves with their local council, which provides local accountability. This will be lost within an enlarged Belfast City Council.

25. The loss of a major part of Castlereagh to Belfast City would have major implications for community cohesion and identity. Over the years the council has nurtured and developed excellent working relationships with local groups, and has fostered good community relations at the local level. It has actively pursued a community development strategy, working in partnership with local people, many of whom reside in areas of high social need. This type of approach and local identity will, it is feared, be lost in areas such as Belvoir, Braniel, Cregagh and Tullycarnet, where settled housing areas will transfer to Belfast. Community organisations and groups have expressed concern that Castlereagh Borough Council's partnership approach to community development will disappear, to the detriment of local community need.

26. Of major and real concern to our ratepayers at present is the prospect of being transferred to a Council which sets a much higher district rate. **In this current financial year Belfast City Council's non-domestic rate is 40% higher and its domestic rate 33.5% higher than in Castlereagh.** The circa 26,000 residents and the businesses in Castlereagh transferred to Belfast will incur **substantial financial penalties** by having to pay much higher rates without any demonstrable improvement in either the quantity or quality of services. Indeed, given Castlereagh's performance figures, it is most likely that they will be paying considerable additional money for a reduction in service quality and efficiency. **The high rates increase post RPA for the affected residents and businesses is quite likely to cause considerable public outcry once it becomes public knowledge. On this basis, singling Castlereagh out to be effectively cut in two, when it is arguably one of the best performing councils in Northern Ireland is difficult to comprehend and seems totally unjust.**

27. The DOE have confirmed that Castlereagh Borough Council's assets and staff will not automatically transfer to Belfast. In essence both Transitional Committees will have to liaise, with Belfast City firstly having to determine what services it wishes to deliver in that portion of Castlereagh being transferred, the locations the services are to be delivered from and the total number of staff required. Whilst undoubtedly Belfast will require additional frontline staff (refuse collectors, street cleansing staff, community services staff etc), it is clear that they will not require additional managerial staff, administrative staff, support staff or many additional professional officers. The new Lisburn City and Castlereagh District Council will move from Lisburn being the second largest council and Castlereagh being the tenth largest, to being the second smallest council post RPA. As the new council (in total population terms) is not much larger than the existing Lisburn City Council (and assuming that transferred functions will come with transferred staff from other agencies), it is clear than when the two councils' staff are pooled, that there could be redundancies up to the size of Castlereagh's current workforce (676 fulltime, part time and casual staff). In effect this means that the second smallest of the new councils will have an excessively high and disproportionate number of redundancies. As the Council is also likely to have the second lowest income, this could have a catastrophic effect on the Council's finances, given that on current planning any redundancies will have to be funded by the councils themselves.

28. As stated at the outset, the proposals to increase the size of Belfast City Council are flawed and without any justifiable merit. The Council will be too large to provide local accountability, in what is in effect a 'divided' city, and will struggle to provide a high quality of services equally throughout its area due to its size.

29. Finally, it is the Council's view that the current Borough status of Castlereagh should be carried forward into the title of the new Council to permit the Council to take advantage of the privileges such title endows, such as electing a mayor and aldermen, and awarding the Freedom of the Borough to worthy recipients. As the councils are effectively merging, this should be automatic and will avoid a lengthy application having to be made to change the proposed District status after the new council comes into existence. The proposed title should, therefore, be amended to 'Lisburn City and Castlereagh Borough Council.

30. Castlereagh Borough Council at a special meeting on 10 November 2008 unanimously resolved to oppose the proposed boundary changes. It respectfully requests that the points outlined above be carefully considered and that the current boundaries of Castlereagh be fully integrated into the new Lisburn City and Castlereagh District Council.

Yours sincerely

(Original signed)

A M DONALDSON
Chief Executive