



# RetailNI

Standing up for  
Independent Retailers

## Consultation Response to Lisburn and Castlereagh City Council LDP Preferred Options Paper (POP)

Retail NI welcomes the opportunity to respond to the Council's Preferred Options Paper (POP) consultation and can confirm we have considered the document in full.

Presently some aspects are more relevant than others, so we reserve the right to make future comments as the LDP progresses and elaborate on the initial points raised in this submission.

### Part 1 - Introduction

1. We are in agreement that a good plan will lead to consistent decisions, whilst ensuring people understand where development will be promoted and accepted.
2. This would accord with the general functions of the Planning Act (NI) 2011 in respect of the general assembly and development of land. It also means that the plan will operate in the public interest and the council area as a whole.
3. It is noted that the purpose of the POP is to stimulate debate on issues of strategic importance in the Council area to 2030.
4. It is accepted that the Borough occupies a strategic position at the junction of North-South economic corridor and the East-West transport corridor. Therefore account would need to be taken of the adjoining Council areas and in particular Belfast City Centre, as there will be catchments and retail issues that will "cross cut" the District boundaries, as no catchment is closed.
5. Whilst job creation and prosperity is a key priority and should be promoted it should not be at the detriment of existing businesses. Job displacement should always be a material consideration.
6. The LDP will contain two documents;
  - **Plan Strategy** – Overall objectives and strategic policies for managing sustainable development and growth across the whole council area.
  - **Local Policies Plan** – Formulation of a set of local policies, which should consider the Plan Strategy and how it can be delivered.
7. There may be proposals that comply with the more detailed policy tests in the Local Policies Plan, but do not comply with the overarching and potentially competing objectives in the Plan Strategy. This would be expected and should not necessarily render a proposal unacceptable.
8. Although the notional end date for the LDP is 2030, no plan can take account of future trends, emerging issues or the myriad of scenarios that will occur over its life and nor should it try. It should evolve as it progresses.
9. The statutory requirement to monitor and review the plan will ensure it is responsive, appropriate and sound.

### Part 3 – Policy Context

1. The policy section acknowledges that the provisions of the Strategic Planning Policy Statement (SPPS) for Northern Ireland must be taken into account in the preparation of the Local Development Plan.
2. The SPPS introduces a "town centre first" approach for the location of future retailing and other town centre uses. Its aim is to "support and sustain vibrant town centres across Northern Ireland through the

*promotion of established town centres as the appropriate first location of retailing and other complementary functions, consistent with the RDS”.*

3. This approach is reiterated in first bullet of the Regional Strategic Objectives at paragraph 6.271, which states; “Secure a town centres first approach for the location of future retailing and other main town centre uses” and also in paragraph 6.273 of the Regional Strategic Policy where a mandatory town centre first approach is indicated. It is also acknowledged that paragraph 6.275 reiterates that LDPs should include a strategy for town centres and retailing and contain appropriate policies and proposals that must promote town centres first for retail and other main town centre uses.
4. In addition the second bullet of paragraph 6.271 raises the sequential approach to the identification of retail and main town centre uses in Local Development Plans (LDPs) and when decision-taking. This is directly related to paragraphs 6.280 and 6.281 of the Regional Strategic Policy which follow.
5. The SPPS indicates that Planning Authorities should also retain and consolidate existing district and local centres and ensure their role is complementary to the role and function of the town centre.
6. LDPs must also be informed by robust and up to date evidence in relation to need and capacity.
7. Retail NI feels that it is important to highlight the “town centre first approach” that the SPPS promotes and that the LDP must be in accordance with prevailing regional policy.

#### **Part 6 – Strategic Objective (B) – Driving Sustainable Economic Growth**

1. Retail NI is supportive of objectives and policies that encourage existing and new businesses to thrive and invest. The LDP provides a basis for rational and consistent decisions on planning applications and this will provide greater certainty for inward investment and the creation of employment.
2. In order to be sustainable sufficient land must be provided at a variety of locations across the District and this must be considered in conjunction with the existing settlement hierarch. Proposed housing growth will act as a catalyst for employment.
3. In cases of Major Employment locations, these should be at strategic locations and in close proximity to transport intersections. In other locations of existing employment, growth must be considered on the basis of the available floorspace and the ability to organically grow over the life of the plan. This would need to be considered on a site specific basis and requires an understanding of future requirements.
4. Existing developed employment land must be given strong protection to avoid it from being lost to other development uses.
5. We agree with the approach to support towns and villages, as centres of employment and services for their surrounding hinterland. This enables them to act as a hub to serve the existing catchment and reduce the need for travel. In supporting them the LDP must ensure an adequate supply of land is available over the plan period.

#### **Part 6 – Strategic Objective (C) – Growing Our City, Town Centres, Retailing & Offices**

1. Overall we are supportive of the objectives, as they appear logical and seek to promote a good mix of uses in the city and town centres. This will encourage linked trips and enhance the vitality and viability of cities and towns as destinations for all, which will assist in driving footfall and reducing the current vacancy rate.
2. A diverse range of uses will be the key to the continued success of existing city and town centres. The accumulation or saturation of a particular type or range of uses will undoubtedly create vulnerability to dynamic markets. Regular health checks and monitoring will ensure responsiveness and that any reduction in footfall or increase in vacancy can be swiftly identified and a response prioritised.
3. We agree that the twilight and night-time economies need to be considered as catalysts for growth in conjunction with the daytime uses. The introduction of commercial leisure development, arts and restaurants in city and town centres will encourage people to stay after the traditional 5pm close.
4. The regeneration and reuse of existing buildings and previously development land, enables a review of the amount, size and location of future units. This can influence the future supply, so that a mix of floorspace can be provided in locations that would align with retailer profiles and requirements.

## **Part 7 (b) – Driving Sustainable Economic Growth (Key Issues 5-10)**

### **Key Issue 5 – Safeguarding Existing Employment Land**

1. The POP indicates that existing employment land consists of two types in BMAP 2015;
  - Developed existing zoned employment land of which there is 283 hectares of land zoned, with only 2 hectares remaining undeveloped (99% has been developed) and;
  - Undeveloped zoned employment land of which there is 264 hectares of land zoned, with only 5 hectares having being developed over the course of BMAP 2015 (97% remains undeveloped)
2. The RDS 2035, Policy RG1 seeks to ensure an adequate supply of land to facilitate sustainable economic growth. It is apparent given the amount of undeveloped zoned employment land in BMAP 2015, that an “Employment Land Evaluation” must occur to establish, which sites are to be retained, replaced or released and any gaps in the portfolio.
3. It appears that too much land has been zoned in BMAP 2015 and that this has not been sufficiently distributed throughout the District.
4. Retail NI agrees that existing employment land should be protected, where it has been developed. However an “Employment Land Evaluation” should take place in respect of the undeveloped zoned lands, when considering that virtually none of it has been developed over the life of BMAP 2015.

### **Key Issue 6 – West Lisburn/Blaris Major Employment Location (MEL)**

1. The preferred option focuses on the delivery of Blaris and specifically the Knockmore Link Road infrastructure scheme as there are wider benefits. In observing Map 10 and when considering the amount and proximity of existing employment land, Sprucefield and the Maze it appears appropriate to redesignate.
2. In our opinion it is very difficult to deliver mixed use schemes and Retail NI would have significant concerns in respect of “sui generis” and retail uses being permissible on this site, as this could lead to further unfettered retailing. This is especially relevant when taking account of the sites proximity to Lisburn City Centre and the cumulative effects with Sprucefield.
3. On that basis preferred Option 6B would appear more appropriate. This option also enables further consideration of the site specifically for housing or industry or both, dependent on the demand following periodic review of the plan. When considering the amount of undeveloped employment land, the use of this site for housing would not significantly impact on the availability of land for growth and would allow a better redistribution across the area. Redesignation to housing may also act as a catalyst and direct development to the Maze site, which is of regional importance and in close proximity.

### **Key Issue 7 – Purdysburn Mixed Use Site Major Employment Location (MEL)**

1. Retail NI would be supportive of Option 7A and the delivery of industrial and business units, research and development, residential institutions and community uses within this site.
2. When considering the proximity to existing protected centres and existing neighbourhood retailing, “sui generis” and retail uses should not be permitted.

### **Key Issue 8 – The Maze Lands Strategic Land Reserve of Regional Importance**

1. Retail NI fully supports preferred Option 8A and the development of this strategic site and would support its use for agri-food, life sciences, hi-tech and food and drink sectors.

### **Key Issue 9 – Facilitating Sustainable Rural Economic Development in the Countryside**

1. Retail NI supports towns and villages as centres and hubs of employment to support the wider rural community. This is both sustainable and logical. It is accepted that some development may be located at the edge or outwith of settlements.

2. Development should be of a size and scale appropriate to the settlement and its relative position in the settlement hierarchy. It should facilitate organic growth of existing areas of employment, especially where this is located in close proximity or at the edge of existing towns and villages.
3. Retail NI fully supports preferred Option 9B as this will stimulate economic activity and could facilitate appropriate edge of settlement locations for rural business development zones.

## **Part 7 (C) – Growing Our City, Town Centre, Retailing & Offices (Key Issues 11-17)**

### **Key Issue 11 – Growing Lisburn City Centre**

1. The approach of developing a Retailing Strategy to support Lisburn City as the focus of administration, commercial, cultural and retail activity and to grow its retail offer is completely endorsed by Retail NI.
2. It is our opinion that traditionally town centres have been too constrained to accommodate growth and provide flexible and varied floorspace for both national multiples and local independents. This has without doubt resulted in a proliferation of edge of centre and out of centre retail proposals. City and Town Centres should allow for sufficient growth over the plan period, identify redevelopment sites or where sites can be amalgamated to provide sufficient floorspace for larger retail units.
3. The Lisburn City Masterplan and the approach advocated in preferred Option 11A will enable better connectivity and linked trips. Whilst enabling development opportunities for anchor tenants and national multiples to be located within the new City Centre boundary. The mixture of uses and opportunity to improve the public realm will assist in enhancing the City Centre and making it more attractive for new retailers to take space and as a destination for all users.
4. Retail NI fully supports the preferred Option 11A as this demonstrates a commitment to a “town centres first” approach advocated in the SPPS.

### **Key Issue 12 – Strengthening Town Centres**

1. There are a number of town centre issues facing Northern Ireland’s towns, which were identified in the GL Hearn Report, which was produced for the DOE in January 2014. The findings advocated a stronger policy stance on protecting and enhancing town centres, which was adopted in the subsequent SPPS.
2. Retail NI agrees that it would be logical to designate town centre boundaries in all three towns. However it does not follow that these should accord with the Conservation Area boundaries. They are not one and the same and when examining the referenced maps is apparent that there are existing retail units, outwith the proposed town centre boundaries. In our opinion that does not reinforce the purpose of setting a town centre boundary and actually confuses and weakens the approach rather than strengthening it.
3. Only two preferred options have been presented, despite also acknowledging that Lowe’s industrial Estate is located in the existing town centre boundary for Carryduff there is no alteration to remove it. The proposed boundaries take no account nor do they reflect the circumstances on the ground.
4. Retail NI would suggest that this is revisited and that the town centre boundaries reflect the actual circumstances, rather than following a Conservation Area boundary, which deals with an entirely separate matter. Otherwise the three towns could find that growth is restricted and town centres weakened rather than strengthened and encouraged.

### **Key Issue 13 – Sprucefield Regional Shopping Centre**

1. Retail NI acknowledges Sprucefield’s role as a Regional Shopping Centre.
2. The GL Hearn Report produced for the DOE, acknowledges that the level of multiple retailer representation in Lisburn City Centre is limited and that none of the major convenience retailers have representation in the city nor is there any department store representation. Its conclusion was that this is due to the presence of Sprucefield approximately 2.43km from the city centre.
3. Retail NI notes an inconsistency on page 100 of the POP, which states “*Any such expansion of the retail function of the City Centre will need to be carefully planned for sustaining and improving the existing retail areas of the City Centre, as well as complementing Sprucefield*”. This approach is incorrect as Sprucefield should complement Lisburn City Centre.

4. On the 18<sup>th</sup> May 2017, Belfast City Council was successful in their appeal of the previous High Court decision dated 18<sup>th</sup> November 2016 in that the Remedies Order exceeded the steps as there was no validly-adopted plan.
5. Retail NI can only support development at Sprucefield that is in accordance with the “town centres first approach”, as expressed in the RDS and SPPS.

#### **Key Issue 14 – Strengthening District & Local Centres**

1. Retail NI would suggest that a full “Glossary of Terms” be produced in the Local Plans Policies, so that small scale emerging Local Centres or Commercial Nodes can benefit from policy protection as they grow and also to direct appropriate uses to them. A wider glossary was previously included on pages 29-30 of the withdrawn PPS5. A “Glossary of Terms” provides the most acceptable and logical tool for defining and interpreting retailing and retail centres over the plan period. Whilst it is noted that the POP includes a definition for District & Local Centres it would be of benefit to expand this or undertake a retail specific glossary.
2. In this regard we would suggest that Dundonald would have the characteristics, scale and function of a small District Centre and this should be reflected in the new LDP. There are also a number of other groups of retail units which should be defined as Local Centres throughout the District.
3. The wording of the SPPS to retain and consolidate existing District and Local Centres and ensure their role is complementary to the role and function of the town centre. It is noted that the Council has recently granted a retail proposal at Drumkeen Retail Park – Y/2015/0002/F, which is adjacent to Forestside District Centre.
4. Whilst the preferred Option 14A is to extend the boundaries of both District and Local Centres, Retail NI would seek the Council apply caution, as the extension to Forestside is too close to Belfast City Centre and the retail catchments would clearly overlap. The dilution of existing conditions restricting retailing of bulky goods is also very concerning.
5. On that basis Retail NI would suggest that the existing Forestside District Centre boundary remains the same and that Dundonald is designated a District Centre and extended.

#### **Key Issue 15 – Growing the Night Time Economy**

1. The role of city and town centres has to be diverse in order to appeal to the widest amount of users and attract significant footfall. This should not be limited to the daytime economy and must include a mix of retail, leisure, culture, arts, community, business and entertainment uses.
2. It is the twilight economy that needs focus, so that people stay in the city and this naturally leads to a night-time economy. The development of a cultural, arts and live music scene creates identity and vibrancy, which gives people a purpose for staying in the city. Likewise encouraging offices to be located in the city centre will also drive footfall. The flexibility to enable “pop-up” shops in vacant units, events or annual festivals will sustain a centre’s vibrancy, along with a high quality public realm.
3. Retail NI is encouraged to see a desire to grow the night time economy and supports the preferred Option 15A.

#### **Key Issue 16 – Promoting Office Development within the City, Town, District and Local Centres**

1. The city centre needs high quality and available office space to provide for small, medium and large businesses. Ideally this will be located at first floor to ensure active street frontages and primary retail frontages. Alternatively it may be appropriate to locate larger developments in highly accessible locations at the edge of city and town centres.
2. We agree that office space should be limited outside of city and town centres, but it would be inappropriate to locate offices at local centres, when considering their scale, function and location. We are broadly supportive of the preferred Option 16A and would seek the removal of local centres.

## **Key Issue 17 – City Centre Development Opportunity Sites**

1. It is accepted that there are a number of underutilised sites in the city and that regeneration will provide a stimulus for growth and inward investment. There is also the opportunity to improve the streetscape and create active street frontages, which will enhance the city centre.
2. The Lisburn Masterplan along with a policy framework is required to guide development to specific areas and to provide greater certainty for investors. A “call for sites” consultation exercise should occur, so that development can be encouraged. Agreement and contributions can be used to facilitate redevelopment of more difficult sites to ensure there is no diminution in city centre car parking or the quality of the built environment.
3. Retail NI agrees with the preferred Option 17A as it is logical and will enhance the city centre.

It is noted that the POP covers other areas relating to housing, open space, recreation, transport, infrastructure, the built and natural environment. The approach of the POP appears to be broadly consistent with existing prevailing policy context.