



Development Plan Team

Causeway Coast and Glens Borough Council
Cloonavin
55 Portstewart Road
Coleraine
BT52 1EY

21st September 2018

By Post & Email

Dear Sir/Madam

Re: Causeway Coast & Glens Borough Council - Preferred Options Paper (POP)

Retail NI welcome 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 at the Plan Strategy and Local Policies Stage.

Chapter 1 - Introduction

1. A good LDP will lead to consistent decisions, whilst ensuring people understand where development will be promoted and accepted. This will also provide a greater level of certainty for investors, communities and the public.
2. This approach would accord with the general functions of the Planning Act (NI) 2011 in respect of the general assembly and orderly development of land and buildings. It also means that the plan will operate in the public interest and that of the Borough, as a whole.
3. It is noted that the purpose of the POP is to promote and stimulate debate on key issues and to encourage feedback from a wide range of public, community and key stakeholders, which will help to inform the next stage of the LDP.
4. Although the plan covers a significant time period (until 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. The statutory requirement to monitor and review the plan every 5 years will ensure it remains responsive, appropriate and sound.
5. Whilst growth and prosperity are key priorities and should be promoted. They should not be at the detriment of the many existing businesses and environmental designations within the Borough.
6. The LDP will contain two development plan documents (DPDs);
 - **Plan Strategy** – Overall objectives and strategic policies for managing sustainable development and growth across the whole council area – (Volume 1)
 - **Local Policies Plan** – Formulation of a set of local policies, which should consider the Plan Strategy and how it can be delivered – (Volume 2)



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. The transitional arrangements are set out in the Legislation and the SPPS to ensure continuity as we transfer from Central Government to Local Government and until the new LDP for the whole Council area is adopted. It provides a mechanism for consistency in the decision-making functions.

Chapter 2 – Accompanying Appraisals & Assessments

1. This Section provides an overview of the key appraisals, assessments and screening determinations the Council must undertake as part of the LDP process to ensure the integrity of conservation objectives, equality of opportunity and sustainability.
2. There were significant legal challenges brought against Central Government during the preparation of the last development plans on the premise of breaches in the Strategic Environmental Assessment (SEA). This is a critical area that the Council needs to undertake correctly. The Council must demonstrate that they have assessed all reasonable alternatives to the “preferred option”, which are capable of meeting the objective of the Plan.

Chapter 3 – Setting the Context

1. There are no significant comments relating to this Section, as it identifies the relevant Regional and Local Strategies, Prevailing Regional Planning Policies and Supplementary Planning Guidance documents. It also confirms that engagement with neighbouring Councils has taken place on cross-cutting matters. There is no specific commentary on transboundary issues. Although there is acknowledgement that the Borough has been in collaboration with Donegal County Council (RoI). This is prudent considering the implications of Brexit and that The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 will consider neighbouring EEA States and the potential for environmental impacts.
2. Account will need to be had for emerging documentation from the Department for Infrastructure (DFI). Specifically, the review of planning policies on renewable energy and development within the countryside following the release of the Strategic Planning Policy Statement (SPPS) for Northern Ireland in September 2015. This review is expected to be completed in 2018 and should be considered in the LDP, as it will be the latest expression of policy on these aspects from Central Government.
3. The Borough is still covered by NAP 2016, which although past its notional end date is one of the relatively recent LDPs when compared to the other development plans across Northern Ireland, several of which are a significant vintage.

Chapter 4 – Borough Profile

1. This Section provides a broad overview of the demographics, economic profile, environmental characteristics and travel patterns of the Borough.
2. It acknowledges the highly attractive landscape, which accounts for significant tourist input and that the local economy is reliant on the service sector. The Borough is well connected by both road, rail and sea. Two major roads schemes are proposed, which will provide a significant investment in infrastructure, resulting in a positive impact on accessibility to the Borough



Chapter 5 – LDP Vision, Overarching Principles and Strategic Objectives

1. The LDP Vision, is long and overly complicated, it could be revised to read:

“A world renowned built and natural environment, with a vibrant and innovative economy, providing opportunities for all who live, work and visit”

2. We fully endorse that the LDP must take account of the Community Plan and Council Corporate Plan. There are three broad and overarching themes that will support the delivery of the LDP and Vision. We agree that no one area shall be regarded as having priority over the other. The themes interrelate and accord with the principles of Sustainable Development. These areas are then expanded upon in more detail in the Strategic Objectives and Preferred Options that follow.

Social

- The ten objectives are balanced and seek to accommodate people and facilitate communities by focusing on the growth of the main hubs in accordance with the RDS. Retail is in agreement with objective and would provide further comments below on this aspect.
- The RDS has already classified the main urban areas in the Borough, attaching weight to their size, role, strategic location. We agree that the LDP needs to accommodate growth across the Borough over the plan period. This should be commensurate with their place in the settlement hierarchy
- We fully endorse the need to protect and consolidate the role of local towns and villages. The provision of local centres and services will reduce the need for travel and promote social interaction for the ageing members of society, such services are the life blood of communities and must be robustly protected.
- New housing schemes over a specific threshold should include community facilities such as retail, health, shared amenities and leisure to reduce the need to travel and include high quality amenity space.
- A mixture of new homes in accessible locations around the Borough will assist with the future growth and regeneration plans. The Demographics indicate that the population is varied, and account will need to be taken of the location and tenure of housing allowing for fluctuations in age groups.
- People are a product of their environment and high-quality design and layout including accessible open space will provide a positive outlook, assist with aspects of health and well-being and opportunities for recreation. This will improve social interaction and cohesion in the community. Open space should be viewed as an asset entrusted to all and as a way of improving the visual amenity of the area.

Environmental

- These objectives consider the conservation, protection and enhancement of the environment through positive placemaking, improved infrastructure and protection of the built and natural environment. These aspects will improve public health and reinforce the unique natural assets of the Borough. We agree with the thrust and direction of the Environmental Objectives. They are broad expressions of how they will facilitate the overall Vision.



- The provision of green infrastructure and community space is critical in promoting active travel and providing a shared space. Highly quality sports facilities, defined walking routes and positive use of inland waterways creates opportunities for leisure and tourism and should be evaluated, upgraded and expanded as part of the plan process.
- The emphasis is to enhance the connectivity and infrastructure within the Borough, whilst sustaining and protecting the areas of high scenic value and built heritage.
- A joined-up approach to transport and development needs to be implemented in the LDP. The clustering of business and services at strategic locations on the transport network is critical in encouraging linked trips, car sharing and park and ride facilities, which will reduce car usage and journey times throughout the District.
- The protection and enhancement of existing open space and the provision of new open space promotes active and healthy lifestyles and the conservation of biodiversity, which contribute to sustainable development.

Economic

- Retail NI is supportive of objectives and policies that encourage existing and new businesses to invest and grow in the District, particularly those that support, regenerate and promote vibrant Towns, Villages and Small Settlements.
- The objectives focus on creating jobs and promoting prosperity in the Borough. Whilst inward investment from new business is key to creating growth, it should not be prioritised over the investment of existing businesses.
- A range and mixture of retail, leisure, community, business and entertainment uses will attract greater footfall and encourage linked trips within existing town centres. This will reduce the number of journeys by private car and assist with the reduction in shop vacancy. The twilight and night-time economy need to be considered as catalysts for growth alongside the daytime economy to maintain vibrancy and reduce vacancy.
- The regeneration and reuse of existing buildings or previously developed land is sustainable and provides opportunities to enhance the quality of the environment, whilst providing flexible space for new businesses at a choice of locations.
- Existing employment land must be given protection to avoid it being lost to unfettered and unacceptable uses. Regard would need to be taken of the existing floorspace and “headroom” available through extant consents and the complementary nature of any proposed alternative uses.
- The plan should support significant leisure and tourism destinations and the increase in arts, culture and sports projects, so that a mix of activities are available to enhance and encourage growth of both local and overseas visitors.
- Enhanced connectivity across transport and technology will assist with economic growth and will assist business “Start-Ups” and “Homeworking”, which are crucial in rural areas as they prevent car travel and contribute to the local economy. Suitable policies are required to support small scale enterprise. In the urban area “Knowledge” based industry enables local companies to operate in a global marketplace.



Chapter 6 – The Preferred Options

Spatial Considerations and Options

1. We agree that to inform the Spatial Growth Strategy (SGS) account must be taken of the existing evidence base in the RDS 2035, existing development plans and that additional robust evidence is required to define an up-to-date settlement hierarchy within the Borough. Decisions about growth and allocation of development can only be reached in an up-to-date evidential context.
2. A threshold of 5,000 population is used to define a large town at Annex E of the Addendum to PPS7 – Safeguarding the Character of Established Residential Areas. This threshold is also referenced at paragraph 3.17 of the RDS 2035 and paragraph 6.134 of the SPPS, so is a suitable benchmark for measurement.
3. Retail NI supports the use of a settlement hierarchy, which is aligned with the RDS and classifies the Main Towns in the Borough, attaching weight to their size, role and strategic location. The LDP needs to accommodate growth across the Borough over the plan period and in accordance with the distribution at each Tier. Future growth must be proportionate to the size, scale and strategic function of each Tier in the hierarchy.

Key Issue - SG1 – Spatial Growth Options for the Borough

4. Retail NI agrees with the preferred option as the four hubs are home to 37.2% of the Borough's population or some 52,300 people in 2015. It is accepted that larger settlements, due to their critical mass should have a higher order and range of employment, services and infrastructure and are best placed to accommodate growth. However, there is also a strong rural community, which needs to be supported by vibrant villages and small settlements. In villages and small settlements appropriate flexibility is required to accommodate demands and support dispersed rural communities.
5. To be sustainable, sufficient land must be provided at a variety of locations across the Borough and this must be considered in conjunction with the existing hierarchies. Proposed housing growth will act as a catalyst for employment growth in retail, industrial and the service sectors. Any increase should take account of the overall population growth for the Borough and then be weighted toward the hubs.

Key Issue – SG2 – The Settlement Hierarchy

6. We agree with the preferred option and the need to define an up-to-date settlement hierarchy within the Borough and that it should then inform decisions about growth and development. The first step is to calculate the total number of dwellings in the Council area over the plan period and then to allocate them. It is accepted that this process is not an exact science and different assumptions can produce significant variations. We agree that figure will be indicative and is not to be rigidly adhered. In any case it will be kept under review as part of the ongoing monitoring of the plan.
7. The re-classification of existing settlements or designation of new settlements reflects the changes that have occurred during the intervening period and provides greater consistency with the RDS and HGIs. It may also be appropriate to consider the movement of several of the larger Tier 3 - Villages, which can accommodate growth into Tier 2 – Towns, Tier 2 - Towns into Tier 1 – Hubs. This will ensure the 60% target in the RDS is met by focusing housing in main hubs and towns, which have the necessary infrastructure.
8. Although lower down the hierarchy the inclusion of new settlements and the re-classification up the hierarchy (bottom up approach) enables sustainable long-term growth of the Local Towns & Hubs at the higher Tiers. As it will facilitate localised growth and a provision of services of an appropriate



scale to reduce the need for travel. The housing allocation need to take account of the HGI figures and 2011 Census data. This is especially relevant given the distribution and the significant rural community.

9. The approach must be to strike a balance between providing appropriate development opportunities and despoiling the countryside with development that is inappropriate in scale or location. Account will need to be taken of the existing rural communities needs and the ability of the landscape to absorb new development. The re-use of existing buildings is clearly sustainable and minimises the impact on the landscape. It should be actively encouraged where suitable.
10. The LDP will be monitored and reviewed and can take account of any required changes over the period of the plan. It can therefore adjust taking account of the demands of the Borough over the life of the plan.

Key Issue – SG3 – Location of Zoned Development Land

11. There is a considerable amount of zoned housing sites that have still to commence, whilst these unimplemented sites create an oversupply in specific areas there should be no de-zoning of housing land given the low build rates following the recession. This should be reviewed and if sites are not progressed, it may be appropriate to re-visit this aspect at a later stage.
12. The overall thrust and direction of the Growth Strategy by focusing on improving and developing the road network whilst encouraging regeneration and investment in knowledge-based industries, education, retail and tourism.

Key Issue – GP1 – Promoting the General Principles of Good Design and Place-Making

13. Good design principles should be promoted and encouraged and design solutions appropriate to the setting and distinctive characteristics of the location and a sense of place.
14. Retail NI would comment that a greater emphasis on place-making and design will result in a high quality-built environment for all, which should be encouraged across the Borough. Whilst design guidance can assist it should not be overly prescriptive or constraining.
15. Design & Access/Concept Statements for developments should really be common practice in all circumstances, as it assists with the rationale and understanding behind the proposal. The preferred option is supported. The Plan should seek to identify areas with specific characteristics or other important features and safeguard them as they create a sense of place and contribute to the tourism of the district.
16. Signage is very important in announcing or directing members of the public to commercial premises and businesses. Given the global shift to online and mobile retailing, many businesses are suffering. It is therefore not unsurprising that digital display advertisements, where the messaging can be altered quickly to reflect the available offers or which can enable greater interaction with consumers have been a significantly increasing trend in the last 5 years.
17. Good planning policies ensure a balance is struck, by taking account of new and emerging technologies, whilst ensuring it does not negatively impact on the historical or landscape quality and setting. A blanket ban on digital advertisements in designated areas is not an appropriate response and proposals should continue to be considered on an individual basis taking account of their size and context. Likewise, in the countryside a sign that forms part of a commercial building will be less visually intrusive than a standalone or totem sign. Overly prescriptive policies limiting the size and dimensions take no account of context and should be resisted.



Social Considerations and Options

Key Issue – HS1 – Social Housing Distribution

1. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – HS2 – Provision of Social and Affordable Housing

2. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – HS4 – Private Amenity Space in New Residential Development

3. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – OS1 – Provision of Open Space

4. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – OS2 – Maintenance Arrangements for New Open Space

5. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – OS3 – Provision of Green & Blue Infrastructure

6. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – CO1 – Provision of Health, Education, Community and Cultural Facilities

7. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Economy Considerations and Options

1. The planning process is a key enabler of economic growth, by ensuring an ample supply is available at the right strategic locations. It is accepted that different types of industry and land uses have a variety of development and operational needs.

Key Issue – ED1 – Provision of an ample Supply of Suitable & Available Economic Development Land

2. Retail NI endorses the preferred option approach of undertaking a full audit (capacity study) and review of the existing employment locations to determine land availability and demand. However, would have reservations in respect of the release of employment land for other uses and specifically for retailing or mixed-use development outside of designated centres.
3. Different types of industry and land uses require different locations and development needs. It is acknowledged that there is still a significant amount of land zoned for industrial/employment use that remains undeveloped around the Borough. Likewise, several previously used sites have now become redundant or are unsuitable. The re-use of existing sites and buildings should be actively encouraged by the plan. It may be appropriate to issue “a call for sites” and seek to match business profiles with existing sites. This may result in the growth of Enterprise Zones to encourage new economic development and regeneration of existing underutilised employment sites.



4. Smaller and older sites may be more suitable as potential redevelopment opportunities for alternative uses. This would need to be considered on a site-specific basis, dependant on a clearly identified need and that the proposals being sought are committed developments rather than speculative.
5. In cases of Major Employment locations, these should be at strategic locations, near transport intersections. In other locations of existing employment, growth must be considered based on 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.
6. Existing employment land must be given protection to avoid it being lost to unfettered and unacceptable uses. To include all sui generis uses, could be open to severe manipulation, which would not accord with the intention being sought to enable flexibility of suitable business uses. This requires further consideration and careful wording. Any proposed alternative sui generis use would need to be complementary to the existing land uses, so that there are no compatibility issues or harm to established businesses. Alternative uses must not be introduced which would preclude industrial and warehousing type uses.
7. Allocations should be reviewed periodically and zoned land which is not coming forward for employment uses should be examined on a site-specific basis, against ongoing strategic needs and against a sound evidence base. It may be appropriate to encourage a sequential approach to existing vacant floorspace and other committed developments, as this would be more sustainable. It is also likely they will be at strategic positions on the road network or close to existing or planned infrastructure.

Key Issue – ED2 – Atlantic Link Enterprise Campus (Enterprise Zone)

8. Research and Development (R&D) and knowledge-based industries continue to see growth across the World. When considering the high-quality education facilities, Northern Ireland should be aiming to be a centre and “hub” for training and supply of world class employees in these areas. This will encourage growth and investment across the Province. To ensure the best talent is obtained companies may seek to be located near the institutions that produce it, which may encourage inward investment.
9. Retail NI is fully supportive of the preferred option to zone additional land to facilitate the growth and expansion of the Atlantic Link Enterprise Zone. However, it may be a better option to zone, a smaller area for growth and provide policies for the remainder. This will ensure greater flexibility and will act as a catalyst for investment for complementary uses, which will be supportive of the Enterprise Zone.

Key Issue – RT1 – Retail Centre Hierarchy

10. There are a considerable number of issues facing Northern Ireland’s towns and cities, which were identified in the GL Hearn Report 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.
11. It is accepted by all that retailing is a dynamic function and has evolved considerably in the last 5-10 years with the rise of online and mobile commerce in respect of comparison and convenience goods. Likewise, a change in consumer spending habits due to the economic recession has seen convenience retailing shift from large weekly trolley shops to smaller more frequent visits at a variety of locations.



12. Planning decisions can only be reached in an evidential context and the SPPS clearly states that LDPs are informed by robust and up to date evidence in relation to retail need and capacity. Retail NI is pleased that the Council has undertaken independent research to inform its approach to Retailing in the Borough at this early stage. Unfortunately, town centre health checks did not take place under Central Government.
13. Retail NI endorses the classification of a hierarchy of centres based on their size and function. The introduction of a lower retail impact assessment threshold dependent is prudent and seeks to safeguard centres in accordance with the direction of the SPPS.
14. It is noted that the Riverside remains problematic, due to the historic and causal approach to granting permission for open Class A1 retail and main town centre uses.
15. Retail NI endorse the preferred option and review of the existing hierarchy and identification of new centres. In addition, we would suggest that a “Glossary of Terms” be produced in the Local Policies Plan, so that small scale emerging Local Centres or Village Centres can benefit from policy protection as they develop. This was previously included on Page(s) 29 -30 of the withdrawn PPS5. A “Glossary of Terms” provides the most acceptable and logical tool for defining and interpreting centres and for defining new forms of retailing over the life of the plan and when monitoring.

Key Issue – RT2 – Town, Village and Local Centre Boundaries

16. 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.
17. Town, Village and Local 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. The preferred option takes account of the direction of the SPPS and the overall review of the existing retail hierarchy and associated boundaries.

Key Issue – RT3 – Primary Retail Cores – Acceptable Uses

18. The Primary Retail Core (PRC) must continue to be the focus for A1 uses and the preferred option seeks to achieve this objective. Linked trips have always been a significant and important consideration in driving footfall and other main town centres uses such as cafe, restaurants and pubs can support vibrancy, but should not dilute the retail offer in the defined area.
19. Town Centres must provide flexible and varied floorspace for both national multiples and local independents. Perhaps it would be suitable to undertake a “call for sites” consultation exercise to identify redevelopment sites or where sites can be amalgamated to provide sufficient floorspace for larger retail units and mixed-use development.
20. This will enable greater opportunities for sites to be matched with commercial profiles to encourage anchor tenants or national multiples to be located within Town Centres. Agreements and contributions can be used to facilitate redevelopment of more difficult sites to ensure there is no diminution in town centre car parking or the quality of the built environment.



Key Issue – RT4 – Town Centres – Promoting an Evening Economy

21. A proliferation of one type of use does not assist with sustaining and enhancing the vitality and viability of existing centres. Improvements to the public realm, permeability and connectivity will enable linked trips and enhance the quality of the environment, which will attract and retain people. The key is making the Town & City Centres, District Centres or Local Centres destinations for all, where the range and type of uses must be diverse to appeal to the widest number of users and attract significant footfall. They should be the focus of administration, commercial, cultural, leisure, entertainment, arts and retail activity, so they are not limited to the daytime economy.
22. It is the twilight and night-time economies, which need to be considered as catalysts for growth in conjunction with the daytime uses, to maintain vibrancy and reduce vacancy. The introduction of commercial leisure development, arts and restaurants in city and town centres will encourage people to stay after the traditional 5pm close. It will also provide greater services for tourism.
23. Town centres also provide places for people to live and work. This will undoubtedly assist with the vitality of an area. Living Over the Shops (LOTS) is not a new concept and should be promoted in town centres to provide a mix of accommodation. The protection of existing town centre housing stock also creates a more sustainable environment through the reduction in private car use. Likewise, encouraging offices to be located at 1st floor within the PRC will also drive footfall, along with enabling active street frontages for retail.

Key Issue – RT5 – Retail Impact Assessment Thresholds

24. The preferred option and approach to a specific threshold for retail impact assessments is to be fully endorsed. It takes account of the specific context, size, scale and function of each town in the hierarchy and offers an appropriate level of examination to future retail proposals.
25. Flexibility must be applied in the consideration of all sequentially preferable sites. We would also suggest the disaggregation of large mixed-use schemes. These are often deliberately contrived to be too large to fit in existing centres, to advance their position at an out of centre location.
26. 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. The Council appears to be adopting a responsive approach to retailing in the Borough and we are fully supportive of this type of advocacy.

Key Issue – RT6 – Riverside

27. It was envisaged in NAP 2016 that any future development at Riverside would complement rather than compete with town centres. The Plan acknowledged that Riverside accommodated a range of retailing commonly found in out of town centres, such as a DIY Store and a suite of retail warehouses selling predominately bulky goods.
28. Unfortunately, over the intervening period and as a consequence of subsequent planning permissions the range of goods now directly competes with the town centre. This has without doubt increased vacancy and adversely affected vitality and vibrancy. Taking account of the range available I fail to see how Option 2 would be robust or implementable. I would urge that a third option is adopted, which takes forward the preferred option, but also includes a restriction on leisure or entertainment development at Riverside.



Key Issue – RT7 – Filling Stations in the Countryside

29. It is noteworthy that the SPPS is silent on Petrol Filling Stations (PFS) in the urban area. The only policies are contained within IC 15 – Roadside Service Facilities in the Planning Strategy for Rural Northern Ireland (PSRNI), which is 24 years old and deals with provisions in the countryside on the basis of need.
30. Retail NI would wholeheartedly agree that PFS's perform a necessary retail function, particularly in the countryside where they support the rural community and provide them with much needed services. They are supported by passing trade and therefore tend to be located close to key transport corridors or main road networks.
31. The Council should consider a third option, which would apply a threshold of 250sqm of net retail floorspace in the Countryside and that proposals above this must provide an assessment of need and a retail impact assessment. This would accord with the earlier approach at RT5 and would ensure control over the scale of the associated retail unit to prevent significant retail forecourts. This would achieve the same objective of protecting the vitality and viability of existing centres, without removing flexibility.

Key Issue – TOU 1 – Increasing Visitor Numbers – Impact on Our Sensitive Landscapes

32. The plan should support and create significant tourism destinations and increase focus in outdoor activities, culture, arts, live music scene and sports, which creates identity and vibrancy and gives people a purpose for travelling around and enjoying the hospitality in the Borough for longer.
33. The promotion of events or annual festivals will attract tourists, along with the existing range of world class activities, which enable the natural environment and tourist assets to be showcased. A diverse mix of activities will enhance the Borough for all as a responsible global tourist destination and encourage further growth of both local, regional and overseas visitors.
34. Retail NI is supportive of the preferred option of developing TCZs and TOZs to strike a balance between tourism growth and protection of the tourist assets.

Key Issue – MN1 – Promoting Sustainable Minerals Development – Buffer Zones

35. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – MN2 – Promoting Sustainable Minerals Development – Areas of Constraint on Minerals Development (ACMDs)

36. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – MN3 – Development in the Vicinity of Abandoned Mines, Adits and Shafts

37. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – MN4 – Lignite Resources within the Borough

38. Retail NI has no comments to make in respect of this aspect and supports the preferred option.



Environmental Considerations and Options

Key Issue – AB1 – Safeguarding Our Non-Listed Heritage Assets

1. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – NH1 – Protection of Our Most Sensitive Landscapes and Seascapes

2. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – NH2 – Protection of Our AONBs

3. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – CY1 – Dwellings on Farms

4. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – CY2 – Economic Development in the Countryside

5. The approach must be to strike a balance between providing appropriate development opportunities and despoiling the countryside with development that is inappropriate in scale or location. Account will need to be taken of the existing rural communities needs and the ability of the landscape to absorb new development.
6. We fully support option 4 to ensure economic development can be facilitated within the countryside in sustainable locations to promote vibrant rural communities across the Borough. The existing policies and regional direction promotes, small scale economic development in a positive manner, which sustains and enhances the environment. The decision taker can already achieve this taking account of the site-specific nature and material circumstances of each case

Key Issue – CY3 – Provision of Social and Affordable Housing in Rural Areas

7. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – CY4 – Reuse of farm buildings for non-farm related activities

8. The re-use of existing buildings for economic development and tourism is clearly sustainable and minimises the impact on the landscape whilst utilising existing infrastructure. It should be actively encouraged where “suitable” buildings exist to support rural businesses and communities and the preferred option is supported.

Key Issue – WH1 – Development within the World Heritage Site’s Distinctive Landscape Setting (DLS)

9. Retail NI supports the preferred option, which provides flexibility for landowners and farmers, whilst protecting the landscape setting of the WHS.



Infrastructure Considerations and Options

Key Issue – TP1 – Encourage Active and Sustainable Travel

1. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – TP2 – Parking Provision at Key Tourist Assets

2. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – RN1 – Facilitating Renewable Energy Development Whilst Protecting Our Landscape

3. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – RN2 – The impact of the Presence of Wind Turbines Outside Settlement Development Limits on Future Settlement Growth

4. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – FR1 – Development in Floodplains

5. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – FR2 – Impact of Potential Future Flooding on New Development Outside Existing Floodplains

6. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – FR3 – Promote the Use of Sustainable Drainage Systems (SuDS)

7. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – FR4 – Development in Proximity to Reservoirs

8. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – PU1 – High Structures in Sensitive Landscapes

9. Retail NI has no comments to make in respect of this aspect and supports the preferred option.

Key Issue – DC1 – Developer Contributions

10. Retail NI has no comments to make in respect of this aspect and supports the preferred option.



Chapter 7 – Planning Policy Review

1. The continued use of most of existing planning policies is the most logical option to deal with legacy and emerging policies. The Council is also seeking to update, clarify and make them succinct. Account of the outcomes of the review that is being undertaken by DFI in respect of two areas in the SPPS – Development in the Countryside and Renewable Energy.
2. Comments have been provided throughout this submission in respect of Retail NI's view on the emerging issues and the proposed policy changes.

If you wish to discuss any of the responses in this submission, then please do not hesitate to contact me.

I look forward to receiving future correspondence as the LPD process progresses.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AS', is placed above the printed name of the sender.

Andy Stephens
BA Hons, MSc
Planning Consultant

CC. Mr Glyn Roberts - Chief Executive, Retail NI
Mr Nigel Maxwell – Chairman of Retail NI