



Subject:	Lisburn & Castlereagh City Council - Consultation on Local Development Plan Preferred Options Paper
Date:	16 May 2017
Reporting Officer:	Keith Sutherland, Development Plan and Policy Manager
Contact Officer:	Mark Whittaker, Senior Planning Officer

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Sometime in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
	To present for consideration and comment the Lisburn & Castlereagh City Council (LCCC) Local Development Plan Preferred Options Paper (POP). A copy of the POP Summary Paper is attached at Appendix 2 of this report. The submissions closing date is 25 th May 2017. The proposed draft response from Belfast City Council is attached at Appendix 1 for consideration by the Committee.
2.0	Recommendations
	It is recommended that the Committee notes the public consultation of LCCC's POP. It is further recommended that the Committee considers the draft written response to the POP (see Appendix 1) and, if appropriate, approve it for submission to LCCC.

3.0	Main report
	<u>Key Issues</u>
3.1	Lisburn & Castlereagh City Council (LCCC) recently published its POP and has written to the City Council seeking our views. The LCCC POP sets out a vision and a number of strategic objectives for the new LDP. It also sets out the preferred options for addressing key issues identified. The main issues of particular interest and relevance to Belfast are summarised below.
3.2	The Spatial Growth Strategy seeks to focus growth in accordance with a settlement hierarchy, with Lisburn City, Castlereagh and Dundonald urban areas at the top, followed by the towns of Hillsborough, Moira and Carryduff. Proposed housing growth allocations are based on this hierarchy and are primarily focussed on Lisburn City. LCCC's preferred option is for 13,300 new dwellings (738 per annum) up to 2030, with an additional 10% allowance for market flexibility. This hierarchical approach to growth is considered to be appropriate. However, the POP acknowledges that there is insufficient land zoned or committed for housing, both within the existing urban footprint and within existing designated settlement limits to meet all the planned housing growth during the period of the new LDP. To help address this issue, LCCC proposes to direct significant new housing to a portion of the West Lisburn/Blaris Major Employment Location site. Whilst this may be an acceptable approach, it is considered important that cross-boundary discussion takes place with LCCC and other councils in the Greater Belfast sub-regional area to ensure that individual housing allocations are agreed and implemented consistently to support the Regional Development Strategy.
3.3	In terms of retailing, LCCC's preferred option for Sprucefield is to reinforce it as a regional shopping centre. This takes account of the decision to remove the 'bulky goods only' restriction for additional retail development at the existing centre. As Elected Members will be aware, this is the subject of a separate legal challenge by Belfast City Council and it is not intended to make any detailed comment on this matter in response to the LCCC POP at this time. Nevertheless, it is considered appropriate to comment that any future development at Sprucefield is in accordance with national policy that is based on the 'town centre first approach', as expressed in the Regional Development Strategy and the Strategic Planning Policy Statement.
3.4	The POP proposes to extend the area designated as the Forestside District Centre. The proposed extension will include the retail park, DIY unit and adjoining lands, all on the opposite side of the main A24 road from the existing shopping mall. These lands are currently not included in the District Centre boundary. This represents a significant expansion of the District Centre, which is immediately adjoining the local government district boundary with Belfast City and has a catchment area that extends well into Belfast City. The additional area more than doubles the existing designated centre. This could facilitate the full range of retailing activities at this location. The potential impact on existing retail centres in Belfast City, including Connswater and the City Centre, is of concern. It is considered that the proposed expansion of the Forestside District Centre is inconsistent with the Strategic Planning Policy Statement (SPPS) aim to support and sustain 'town centres' (including city centres) with a town centre first approach for retail and other town centre uses. The significant expansion of retailing activities, particularly for comparison (high street type) retailing, has the potential to adversely impact on the vitality and viability of retailing the Belfast City Council Area, including the city centre and Connswater.
3.5	There are a number of other cross-boundary issues that need co-operation between both councils. These include sustainable travel, waste management and environmental protection issues. In the latter regard, it is acknowledged that the Lagan Valley Regional

	<p>Park and the Belfast Hills are cross-boundary assets that form part of the wider green and blue network. In addition, provision for cemeteries and crematoria is important and the City Council is continuing to explore options for addressing the medium and long term requirements. Continued joint discussion is required throughout all stages of the LDP process to ensure a joined-up and mutually beneficial approach.</p>
3.6	<p>The attached draft response highlights areas of support or concern and issues of mutual interest. The LCCC POP generally represents a positive and proactive approach to future growth and sustainable development. With the exception of the above concerns in relation to retailing at Forestside, there does not appear to be any conflict with our own growth and development aspirations. It forms a basis for continued partnership working with LCCC and we should welcome the POP and the opportunity to comment on it.</p>
3.7	<p><u>Financial & Resource Implications</u> There are no resource implications associated with this report</p>
3.8	<p><u>Equality or Good Relations Implications</u> There are no relevant equality or good relations implications attached to this report.</p>
4.0	Appendices – Documents Attached
	<p>Appendix 1 – Draft Council Response to LCCC’s POP Public Consultation Appendix 2 – LCCC POP Summary Document</p>

Appendix 1: Draft Council Response to Lisburn & Castlereagh City Council Local Development Plan Preferred Options Paper

Planning & Place

Your reference

Our reference 246406

Date

Local Development Plan Team
Lisburn & Castlereagh City Council
Civic Headquarters
Lagan Valley Island
Lisburn
BT27 4RL

Dear Ms Jackson,

LISBURN & CASTLEREAGH LOCAL DEVELOPMENT PLAN CONSULTATION ON PREFERRED OPTIONS PAPER

I refer to your recent consultation on your new Local Development Plan Preferred Options Paper and thank you for affording the City Council the opportunity to comment on the documents. I can confirm that the City Council has considered the consultation documents and wishes to make the following comments at this time.

The POP sets out your Council's vision for the Council area and a number of strategic objectives for the new LDP. These cover a range of issues, including sustainable communities, economic development, retailing, open space, transport and environmental protection. These are generally supported.

Housing Growth Strategy

A key component of the POP falls under the strategic objective to enable sustainable communities and deliver new homes. The LCCC spatial growth strategy seeks to focus growth in accordance with a settlement hierarchy, with the Lisburn City, Castlereagh and Dundonald urban areas at the top of the hierarchy, followed by designated towns, villages and small settlements. The housing growth allocations are based on the settlement hierarchy and the LCCC preferred option is to deliver 13,300 new dwellings (738 per annum) up to 2030, with an additional 10% to allow for market/supply flexibility. This potential build rate is in line with the revised Dfl housing growth indicator and the housing growth figures are noted.

The POP states that a recent analysis of urban capacity indicated that, whilst there was a significant shortfall of housing capacity within the existing urban area, the majority of the new housing growth could be accommodated on zoned and committed housing lands within the existing BMAP settlement boundaries. The POP proposes to address the remaining shortfall primarily through the re-designation of the West Lisburn/Blaris site for mixed use. This position is also noted and there is unlikely to be any conflict on Belfast City arising from the proposed housing growth figures and your preferred option. However, there may be significant benefit in considering a joint housing approach between neighbouring councils in the wider Greater Belfast area, to ensure that housing market need for all is adequately and coherently addressed. In addition, matters in relation to sustainable travel, including cross-boundary transport into/from Belfast, will also require

to be carefully considered and we acknowledge that this matter is included in the POP. We also trust that any potential additional housing land allocations that may be required take due cognisance of the high quality landscape setting of the greater Belfast area, including the countryside and green wedges between Belfast City and Lisburn & Castlereagh. Similarly, whilst the preferred option on rural housing is also noted, it is considered important to ensure that the quality and amenity value of the countryside areas surrounding the conurbation are carefully protected.

Further to the above, and having particular regard to the sub-regional nature of the housing market, it is considered important that discussion takes place with LCCC and other councils in the Greater Belfast area to ensure that housing allocations are agreed and implemented consistently to support the Regional Development Strategy. Such collaborative arrangements would also facilitate consideration of other important LDP matters that may have cross-boundary or sub-regional issues, including sustainable transport, retailing and environmental protection. This is referred to again later in this response.

Sprucefield Regional Centre

LCCC's preferred option in relation to Sprucefield Regional Centre is noted. In this regard, it is considered important that any future development at Sprucefield is in accordance with national policy that is based on the 'town centre first approach', as expressed in the Regional Development Strategy and the Strategic Planning Policy Statement (see further details below).

Forestside District Centre

We wish to raise our strong concern in relation to the particular matter of Forestside District Centre, for which the stated preferred option is to extend the current district centre boundary to include the retail park, DIY unit, Civic Offices and adjoining lands, all on the north side of the main A24 road. The extension lands are identified as "white land" in the Belfast Metropolitan Area Plan 2015 (BMAP), whereas Forestside Shopping Centre, to the south of the main A24 road, is the designated District Centre. The proposed extension at Forestside represents a more than doubling of the existing District Centre boundary and will facilitate the full range of retail activities at this location, including comparison retailing. In this regard, the Retail Park was restricted to bulky retail goods only and, in line with this, the units were subject to a minimum size of 1,000m² by condition in the permission, with a maximum cap on the overall floor area of the Park. These requirements are in the interests of protecting the vitality and viability of existing retail centres and they represent the proper planning and sustainable development of the area.

The Strategic Planning Policy Statement (SPPS) introduces new retail and other town centre uses policy under 'town centres and retailing'. Paragraph 6.270 states that *"the aim of the SPPS is to support and sustain vibrant town centres across Northern Ireland through the promotion of established town centres as the appropriate first choice location of retailing and other complementary functions, consistent with the RDS."* Paragraph 6.273 of the SPSS states planning authorities must adopt a **town centre first approach** for retail and main town centre uses. The term 'district centres' is not used in the SPPS, which means that there are no specific retail policies for such centres, albeit the stated aim remains *"to support and sustain vibrant town centres across Northern Ireland through the promotion of established town centres as the appropriate first choice location of retailing and other complementary function."*

As noted above, the BMAP District Centre boundary surrounds the Forestside shopping centre buildings and car park only and does not extend to the Drumkeen Retail Park and the adjoining lands. The BMA retail strategy seeks to promote Belfast City Centre as the leading shopping centre in the Plan Area and Northern Ireland as a whole. Outside City and Town Centres, BMAP states that the nature and scale of retail development is to be controlled in order to protect the vitality and viability of the city and town centres. Whilst the SPPS does not include any specific

policies on 'district centres', such centres are intended to support retail policy as part of the retail hierarchy, underneath designated town and city centres.

The policy criteria outlined in the SPPS is clear in that it states, *inter alia*:

- Planning authorities must adopt a **town centre first** approach for retail and main town centre uses;
- Adopt a sequential approach to the identification of retail and main town centre uses in Local Development Plans (LDPs);
- Ensure LDPs and decisions are informed by robust and up to date evidence in relation to need and capacity.

Whilst it is acknowledged that the development plan process is the appropriate mechanism to review retail designation boundaries, Belfast City Council is very concerned about the preferred option to expand the current District Centre designation, thereby permitting significant additional non-bulky retailing, including comparison retailing that should be focussed on city/town centres. These concerns arise primarily from the potential direct impacts on the retail hierarchy in Belfast, including the City Centre and Connswater. The potential impacts on the retail function on the city centre and other centres will require very careful assessment, including in terms of methodology and catchment area analysis. In this regard, it must be recognised that a significant proportion of the catchment is within the Belfast City Council area and the impacts on the City's retail hierarchy must be comprehensively assessed. The proposed significant expansion of the District Centre is considered to be disproportionate to its positioning on the retail hierarchy, not being a town or city centre.

Other Cross-Boundary Issues

Many of the options considered may have little or no direct impact on the Belfast City Council area or emerging planning strategy for our area. Nevertheless, the clear overall approach to the POP and the rationale for selecting preferred options is noted and, with the notable exception of the Forestside District Centre expansion, is generally supported. In this regard, it is acknowledged that there are a number of issues that have cross-boundary effects and these will be of particular interest to both councils.

Cross-boundary issues will require continued partnership working. This includes matters such as housing allocations, sustainable travel, waste management, renewable energy, green/blue networks, nature conservation, landscape protection and recreation. Provision for cemeteries and crematoria is also of cross-boundary significance and, in this regard, the City Council's Roselawn facilities are within your Council's area. Belfast City Council is continuing to explore options for addressing the short and longer term requirement for burial grounds and crematoria to serve the needs of the city's residents. In this respect, it may be that any new capacity is outside of the Council's boundary and this will require co-operation with other councils.

Our position as the regional capital means that there are many linkages and synergies between our new LDP and those of adjoining authorities. There is a need for continued liaison and co-operation between both councils in developing and implementing each new LDP. Indeed, as referenced earlier, there is considered to be a need for partnership working across the wider sub-regional area to address common issues in a sound and consistent way. Continued joint discussion is required throughout all stages of the LDP process to support a coordinated and mutually beneficial approach to strategic and cross boundary issues and we look forward to continue working with you on our respective LDPs as they progress.

Other Comments

The POP includes a review of the suite of existing planning policy statements. This covers a wide range of planning issues, including natural heritage, open space, land use & transportation, waste

management and renewable energy. The POP indicates that the broad thrust and direction of current operational planning policy is generally acceptable. This indicates that the planning policies to be contained in the new LDP are likely to be generally consistent with existing policy context and this approach is considered appropriate.

The POP generally represents a positive and proactive approach to future growth and sustainable development. In the main, the strategic approach and options identified do not conflict with our own growth and development aspirations. However, it is important to ensure that policies and actions by one council do not prejudice the sustainable objectives and outcomes in another council. The published document and supporting information provides a basis for our continued joint working with LCCC and we welcome the POP and the opportunity to comment on it.

I trust that the above comments are helpful and will be considered when preparing the LDP documents. The current consultation stage is welcomed and I look forward continue working with you on our respective LDPs as they progress.

Should you require any further clarification, please contact Mark Whittaker, Development Planning & Policy Team, Planning & Place, Tel: 02890 320202 ext. 2321.

Yours sincerely

PHIL WILLIAMS
Director of Planning and Place