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 Planning and Building Control



Belfast
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Date: 10 January 2020

Conor Hughes

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Dear **Mr Hughes**

**LISBURN AND CASTLREAGH LOCAL DEVELOPMENT PLAN 2032
 CONSULTATION ON DRAFT PLAN STRATEGY**

I refer to your recent consultation on your new Local Development Plan Draft Plan Strategy (dPS) and thank you for affording Belfast 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.

A Quality Place

Land Supply and Housing Growth

In respect of the Strategic Housing Allocation, the Council notes that this has been informed by a review of the 2012 based Housing Growth Indicators (HGI's) which has identified a new baseline future housing growth of 10,500 units over the plan period and that a 10% over-supply buffer has been applied 'for strategic housing growth at West Lisburn/Blaris'. This results in a proposed growth figure of 11,550 units in the dPS, which it is noted falls just under the potential units remaining of 11,578 and which is within 4% of the assigned 2012-2025 HGI.

Within Technical Supplement 1(Housing Growth Study), Lisburn and Castlereagh City Council (LCCC) acknowledge the Department of Infrastructure's (Dfi) advice that the HGIs are 'policy neutral'. It is therefore disappointing that the proposed housing growth seeks to continue these existing,

unsustainable trends, despite recognition that past growth has been based on commuting into Belfast.

The supporting evidence has also highlighted concerns in respect of the sustainability of the overall approach to housing growth across the LCCC plan area. The land supply only identifies approximately 40% of new housing to be delivered within the existing urban foot print of the settlements in LCCC. This is significantly lower than the Regional Development Strategy's (RDS) target for 60% to be accommodated within the existing urban areas.

Affordable Housing

The Council welcomes the objective to provide affordable housing in line with need identified by the Northern Ireland Housing Executive (NIHE). It is noted that the total affordable need will be made up of 2,400 social units and 3,840 intermediate units. The Council also support the intention as set out in policy HOU10, to require 20% of units on sites of more than 0.5 hectares or comprising 5 residential units or more to be affordable.

Adaptable housing

Policy HOU4 outlines that 'a range of dwellings should be proposed that are accessible and adaptable in their design to provide an appropriate standard of access for all'. Further, under the justification / amplification section of policy HOU4, it is stated that 'Design standards should be incorporated to provide for Lifetime Homes which meet the varying needs of occupiers and are easily capable of accommodating adaptations'. This differs to Belfast's approach in respect of the thresholds applied, and therefore necessitates close monitoring of any future effects across the wider housing market area.

Density of development

The density of development proposed through Policy HOU4 seem particularly low for an urban metropolitan context, with 25-35 dwellings per hectare proposed within town centres and the greater urban area. Clearly, this is at odds with the SPPS requirement to promote higher density housing developments "in town and city centres and in other locations that benefit from high accessibility to public transport facilities." Increasing the density of development in appropriate locations would also reduce the requirements for unsustainable, greenfield land, in areas such as the 50ha of land at Blaris/West Lisburn.

A Thriving Place

West Lisburn / Blaris Lands

There are concerns regarding identification of a 100ha greenfield site for "mixed use" development for West Lisburn / Blaris and sustainability of this overall approach. Although it is stated as being proposed in order to facilitate the LCCC's strategic economic ambition at West Lisburn (Blaris lands), the Council has some concerns in relation to the circa 50 hectares of land identified here for residential use. The fact that the plan specifically notes that the housing growth has been inflated by 10% to allow 'strategic housing growth at West Lisburn/Blaris' seems to suggest the land is driving the need as opposed to the projected requirement.

The identification of this strategic mixed use site for housing and employment uses would appear to run contrary to SPPS Regional Strategic Objective for transportation and land use planning "to promote sustainable patterns of development which reduce the need for motorised transport". In addition it appears to be in conflict with draft Strategic Policy 20 Transportation Infrastructure "*The Plan will support development proposals that encourage a modal shift from private car dependency through integration of transport and land use*".

The narrative in the dPS suggests that the road link is the focus of the scheme, described as 'the key piece of infrastructure required to unlock the development potential of West Lisburn'. The provision of this road is also the first objective outlined under the masterplan for the proposed urban extension (SMU01).

The Council would challenge the reference and the ascertain in the justification and amplification section of this policy that the site is in a "highly accessible location". The provision of the Knockmore road link is quoted as key to unlocking the development potential of the area rather than improving public transport access such as developing the West Lisburn Railway Halt and park and ride facility. It should be noted that the Lisburn and Castlereagh City Council draft Local Transport Study (LCCC LTS) does not include the West Lisburn Railway Halt as one of the transport measures that DfI expect to deliver during the LDP period to 2032 in the area despite the fact that it is currently a live planning application.

The policy also states that the funding of the M1-Knockmore Link Road shall be the responsibility of the developer. The LCCC LTS states that "new or improved public transport serving new developments funded by the developer" as a potential option under Objective 2 summarised as Public Transport Accessibility. However, developer contributions for the new rail halt is not included as an option for West Lisburn/Blaris rather the emphasis is on a new road link.

It is acknowledged in Technical Supplement 1 that Lisburn and Castlereagh is a well-established net exporter of labour, with 74% of all commuter outflows being to Belfast. The priority should be afforded to sites that have sustainable access into Belfast city via public transport e.g. by train, Glider and other services. The significant housing numbers proposed at this location could compound problems associated with commuting and such a scenario would not represent sustainable development.

Whilst the designation at West Lisburn / Blaris has been informed by an Employment Land Review and Office Capacity Study there is clearly the added risk that these lands underachieve against the proposed employment aspiration, which could lead to pressure to provide a larger share of these mixed use lands for housing.

It is also noted that the dPS seems to largely ignore the 'Maze Strategic Land Reserve', which the Urban Capacity Study suggests has "the potential for an additional 141 hectares of employment land." If this is realised, there is therefore a strong possibility that the full extent of lands at Blaris for employment use may not be required.

The overall approach taken in respect to the assessment of options in respect of the sustainability of the site is concerning. It is noted that no alternatives elsewhere in the district are assessed, rather it simply assesses the 'option' of a new policy provision for this site. No other sites or policy options are assessed, nor is a 'no policy' option included.

In terms of Sustainability Appraisal (SA) assessment of this policy, against the objectives, it is also noted that it generally scores as "positive/very positive" across all objectives other than landscape character. It scores very positive for encouraging active and sustainable travel, and highlights the positive benefits that it would bring about. For example, under 3.2.26 (page 47) of the SA it states there is "also provision for opportunities to improve linkages beyond the site connecting to the wider network be that road, rail or other modes of transport" which would indicate that new infrastructure links would be a positive, consequential result of this policy option. Conversely the dPS seems to indicate that the ability to provide growth on this site, under this policy, would only be possible subject to the new road/linkages.

The policy direction for West Lisburn / Blaris lands as set out in the dPS would appear to stem from the West Lisburn Development Framework Review 2018 (Draft) which is not a statutory document and has therefore not be subject to any SA process or indeed Habitat Regulations Assessment.

A Vibrant Place

Sprucefield Regional Shopping Centre

In the absence of regional retail policy and guidance for Sprucefield in the Strategic Planning Policy Statement (SPPS) there are concerns that the development scenarios set out in the proposed policy approach clearly demonstrate that they have a significance for a substantial part of Northern Ireland, as per Section 26 (1) of the 2011 Planning Act. Given this and Sprucefield's identified role as a regional out of town shopping centre any such regional policy direction ought to be provided by the Strategic Planning Authority. This was noted by the Planning Appeals Commission at the inquiry into the Belfast Metropolitan Area Plan (BMAP)

"We consider that the Department should decide at a regional level what the future status and role of Sprucefield should be and devise clear and unambiguous policy to enable to fulfil that role. The introduction of regional policy in a development plan is unacceptable and cannot be supported." ¹

There are also concern that the approach taken by LCCC draft policy for an unrestricted retail role at Sprucefield conflicts with the recommendation in the Regional Development Strategy 2035² for a precautionary approach to future major retail development proposals based on the likely risk of out of centre shopping developments having an adverse impact on the city centre shopping area of Belfast.

It is also noted that the draft strategy and strategic policy for Sprucefield appears inconsistent with the town centre-first approach to retail investment and development adopted by neighbouring councils, as recommended in the SPPS. For example Policy RET1 of the Draft Belfast LDP 2035 identifies Belfast's Retail Core and City Centre at the top of the retail hierarchy, in terms of the sequential preference for the location of retail development. This approach has the potential to be undermined by LCCC's Sprucefield policy which will effectively bestow town centre status to an out of centre retail location situated at a motorway interchange on the outer edge of the Belfast council area with the potential to significantly adversely impact the vitality and viability of Belfast City Centre and its network of centres. It is further considered that Lisburn city centre will be significantly adversely impacted given its proximity to Sprucefield, with potential for displacement of current operators.

The Council would query the workings of Strategic Policy 14 which on the one hand seeks to promote town centres, retailing and other uses within the City and town centres but also seeks to support Sprucefield Regional Shopping Centre in recognition of its regional status in accordance with key site requirements. Such a policy stance seems incompatible and contradictory. Within the context of the above at least two of the six Operational Policies for Town Centres (TC 1 and TC3 in the LDP) are at cross purposes with its strategic policy for Sprucefield (SMU03). TC1 advocates a sequential approach while TC3 seeks to promote the town centres of Carryduff, Moira and Hillsborough. The draft strategic policy for Sprucefield will make it a de facto town centre that is in direct contravention of the sequential approach.

Further comments relating to the impact of the proposed policy approach at Sprucefield are included in the attached addendum.

A Connected Place

Strategic policy 20 transportation Infrastructure

The requirements set out for new development proposals under Strategic Policy 20 Transportation Infrastructure are welcomed. However, it is not evident that Strategic Policy 20 requirements are

¹ Para 6.4.8 of PAC, Public Local Inquiry into Objections to the Belfast Metropolitan Area Plan 2015 Report on the Strategic Plan Framework, 31st March 2011

² Section 3.46, Regional Development Strategy 2035

being applied to the Strategic Mixed Use sites and in particular in relation SMU01 West Lisburn/Blaris (see comments under SMU01).

Local Transport Study

Under Strategic Policy 20 reference is made to the Draft LTS prepared by DfI for the area. The study outlines seven objectives. Objective 1 states the following "*Enhance accessibility by road and public transport from the urban centres of Lisburn City, Castlereagh Greater Urban area, Moira, Carryduff and Hillsborough to Belfast, Londonderry, gateways and hubs*". It is considered that the emphasis should be on enhancing accessibility by sustainable transport modes and the need to reduce single occupancy car journeys for commuting purposes. Increasing road capacity has the potential to produce a greater number of trips and careful mitigation will be needed to reduce the number undertaken by the private car. The objectives should also refer to improvements in air quality. It should be recognised that there is an air quality management area in the LCC area at Normandy Court Dundonald, on the boundary with Belfast Council area

Draft Belfast Metropolitan Transport Study (BMTS)

Schemes identified in BMTS for the area under illustrative measures are also considered to have an emphasis on increasing road capacity with the dualling of the A26, M1/A1/Sprucefield Bypass and M1 widening outlined. IM 11 Rail B refers to increased frequency on the Lisburn Line but does not refer to new rail halts such as the one proposed a West Lisburn which would improve local and regionally connectivity.

Key Infrastructure schemes

The key transport proposals to deliver major improvements to the existing transportation network include 5 road schemes and one relating to improving public transport capacity which is the West Lisburn, Knockmore halt. However, the status of the new rail halt is unclear as it is not included in the indicative measures outlined in the LCCC LTS.

Operational Transport Policies

The Council would support operational policies TRA8 Active Travel Networks and Infrastructure Provision and TRA9 Park and Ride/Park and Share Car Parks outlined in Section F, A Connected Place. Belfast has transport challenges arising from a large travel to work catchment area and a commuting based on private vehicles to travel. The Council would strongly support the promotion of more sustainable transport links to surrounding population centres.

A Green Place

Designated Natural Heritage Assets

The approach to protecting and enhancing the Historic and Natural Environment through designated heritage assets is welcomed and is generally consistent with the Councils approach published in our dPS. These designations are carried forward from the existing development plan however discussions and further co-ordination will be required for cross boundary matters such as reviewing existing and future AoHSV, LLPAs, Landscape Wedges and SLNCIs which will be assessed as part of the Local Policies Plan.

Strategic and Community Greenways

The Council welcomes the approach to Strategic and Community Greenways where these Greenways are carried forward from the existing development plan. However further work and co-ordination is needed regarding the cross boundary Greenways when reviewing existing / future Strategic and Community Greenways as part of the Local Policies Plan.

Other issues

Cross-boundary issues, such as sustainable travel, environmental protection, retail growth at Sprucefield and waste management, will require continued engagement. The City's Role 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 the new LDPs. 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.

I trust that the above comments are helpful and I look forward to continuing to work with you on our respective LDPS as they progress.

Should you require any further clarification, please contact Keith Sutherland, Development Planning & Policy Manager, Tel: 028 90320202 ext. 3578 or 028 9027 0559.

Yours sincerely

Aidan Thatcher
Director of Planning and Building Control

Addendum to Draft Council Response to Lisburn and Castlereagh City Councils Local Development Plan Draft Plan Strategy expanding on the comments on Strategic Policy SMU03 Sprucefield Regional Shopping Centre and its supporting evidence base

Further to the comments in the letter this document provides greater detail on the implication of the proposed policy for Sprucefield under strategic policy SMU04. It also set out recommendations for L & CCCs dPS.

Impact of Policy Approach

Table 1 below indicates that the projected expenditure growth in the L&CCC area up until the year 2022 falls well short of satisfying the proposed additional turnover at Sprucefield calculated for development scenario 2. The proposed turnover for Scenario 2 in the LDP is two times the level of expenditure growth in the Council area up to the year 2022 (as reflected in the 202% figure in Table 1). Indeed, even up to the year 2027, the proposed turnover at Sprucefield will account for the majority of expenditure growth in the Council area (68%).

Table 1

Proposed turnover at Sprucefield & Expenditure growth in L&CCC				
		2017	2017-2022	2022-2027
	Available expenditure in Council area ¹	£456,619,460	£485,808,254	£572,557,986
A	Expenditure growth in Council area		£29,188,794	£86,749,732
B	Sprucefield Scenario 2 turnover ²		£58,880,250	£58,880,250
C=A-B	Expenditure growth less turnover		£29,691,456	£27,869,482
D=B/A%	Turnover as % of expenditure growth		202%	68%
<i>Sources:</i>				
1. Table 6.2, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019				
2. Table 7.5, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019				

The implications of the above analysis are twofold:

- Firstly, further development at Sprucefield will leave little remaining capacity to develop retailing in Lisburn City Centre and other centres in the Council.
- Secondly, it is patently clear that up to the year 2022 at the very least, major development proposals at Sprucefield will require significant turnover sustenance from beyond its Council area, which implies that significant trade/revenue will have to be diverted from neighbouring Councils.

While the LDP's Technical Supplement on Retail Capacity (para 7.1.3) stresses that future retail capacity should be assessed on the basis of expenditure growth, as illustrated in Table 1 above, rather than calculated floorspace requirements, it is still useful to examine the Technical Supplement's findings on floorspace capacity (Table 2 below). The findings in table 2 highlight how the floorspace allocation under Scenario 2 at Sprucefield will absorb all projected low floorspace requirements in the Council area up to the year 2027 (denoted by the minus 325 sqm figure).

Table 2

Proposed Comparison goods floorspace at Sprucefield & Capacity in L&CCC 2017-2027			
		Low	High
A	Proposed Scenario 2 net comparison goods sqm at Sprucefield ¹	14,625	14,625
B	Net comparison goods sqm capacity in Council ²	14,300	21,400
C=A-B	Balance	-325	6,775
<i>Sources:</i>			
1.0 Table 7.5, <i>Local Development Plan, Technical Supplement 5: Retail Capacity Study, Oct 2019</i>			
2.0 Table 7.4, <i>Local Development Plan, Technical Supplement 5: Retail Capacity Study, Oct 2019</i>			

Arguably, it could be maintained that the high floorspace capacity figure in Table 2 will cater for Scenario 2 growth at Sprucefield. According to the Technical Supplement “The high estimate includes the potential for additional re-capture of leakage and additional increased inflows over the current patterns.” Para 7.1.1

However, it is important to note that the author of the Technical Supplement on Retail Capacity emphasised the appropriateness of relying upon the low capacity forecast for the next decade.

“Overall, this author considers that the forecasts around the lower end of the range may be more realistic over the ten-year period, taking retail trends into account; although this could change.” Para 7.4.2

It is equally significant to note from the quotation below that the author of the Technical Supplement concluded that Scenario 1, which is predicated on delivery of a 50,000 sqm Department store anchored mall scheme at Sprucefield, would be harmful to Lisburn City Centre.

“In reality, expansion of Sprucefield to this level would most likely diminish retail market interest in locating in the City Centre. It would also divert trade from the City Centre. Unless there is an exceptional retail opportunity underpinning the potential expansion of Sprucefield, Scenario 1 would create a risk for the City Centre without obvious benefits.”

Clearly, the above conclusion in respect of Scenario 1 has vindicated the longstanding position of Belfast City Council and other organisations in challenging earlier John-Lewis anchored proposals for Sprucefield.

(b) In seeking to justify its strategic policy for Sprucefield the Technical Supplement focuses on a select number of regional shopping centres in the UK. This simplistic benchmarking analysis is not appropriate given that the centres do not represent like-for-like comparison with Sprucefield – a fact which the Technical Supplement itself acknowledges³. The analysis takes no account of the higher population density of catchments in the UK, which are better able to sustain the size of regional centres cited. Population density in England, in which the regional centres of Bluewater, Lakeside and Meadowhall are found, is approximately three times higher than that in NI (401 v 133 persons per km² according to the 2010 census). The brochure for Bluewater states that there is a catchment population of 11 million people within a one hour drive of the centre. This is in stark contrast to the circa 1.25 million people living within a 1 hour drive of Sprucefield⁴. Comparison with Braehead in Glasgow also ignores the fact that the population of Scotland is roughly 3 times that of NI.

³ Para 2.9, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019

⁴ AnySite Report, Prepared for Braniff Associates for Sprucefield location, Jan 2013, Pitney Bowes

Mindful of the above it is interesting to note that if the retail floor areas of the regional centres in England were reduced on a pro rata basis to reflect the lower population density found in NI (i.e. two thirds less) their size would expect to be on a par with the existing level of floorspace found at Sprucefield, i.e. 46,200-56,100 gross sqm v 44,750 gross sqm at Sprucefield (Table 3). Table 3 also shows that, under Scenario 2 of the LDP, Sprucefield has the potential to increase its retail area to 69,750 gross sqm.

Table 3

Retail and F&B floorspace in Regional Centres in GB & Sprucefield		
Regional Centre	Sqm	Reduced floorspace (sqm) *
Bluewater Kent ¹	170,000	56,100
Lakeside Essex ¹	150,000	49,500
Meadowhall Sheffield ¹	140,000	46,200
Existing floorspace at Sprucefield ²	44,750	
Proposed additional floorspace (Scenario 2) ³	25,000	
Total Sprucefield (Existing & Proposed)	69,750	
<i>* Hypothetically standardised to take account of lower population density in NI (decreased pro rata by two thirds)</i>		
<i>Sources:</i>		
<i>1.0 Para 2.24, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019</i>		
<i>2.0 Tables 4.8, 6.8 and Appendix 8, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019</i>		
<i>3.0 Table 7.5, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019</i>		

(c) The Strategic Mixed Use policy (SMU03) for Sprucefield Regional Shopping Centre states that there is approximately 65,000 sqm of retail space at Sprucefield 5. This figure is incorrect. L&CCC's Retail Study provides a gross internal floorspace figure of 44,750 sqm, comprising 36,586 and 8,164 gross sqm of comparison and convenience goods floorspace respectively. Even allowing for the fact that the latter LDP figure excludes the vacant Currys unit at Sprucefield Park, together with the food and beverage units of McDonalds and Frankie and Bennys, the LDP's 65,000 sqm figure is still a gross overestimate.

(d) Finally, it is also difficult to accept that strategic policy for Sprucefield is based on a robust evidence base given the question marks surrounding the conclusions of its Sustainability Appraisal (SA). Remarkably, the SA states that strategic policy for Sprucefield has no relationship with a number of its core sustainability objectives. On the contrary, there is a clear relationship and this is explained below in relation to a number of the sustainability objectives.

- 8. *Encourage active and sustainable travel* - a visitor survey carried out for a recently withdrawn application at Sprucefield (Application ref: LA05/2018/1061/O) recorded that only 2.2% of shoppers travelled by bus, with nearly all visiting by car. In spite of this finding the SA remarkably concludes that there is no relationship with this sustainability objective. On the contrary, further development at Sprucefield will be incompatible with this objective.
- 9. *Improve air quality* – Related to the above, Sprucefield is a car-centric location as evidenced by the latter finding and the amount of surface level parking spaces available off the M1 and A1 interchange. Car-based proposals at Sprucefield are clearly incompatible with this objective.

⁵ p104, L&CCC LDP Draft Plan Strategy, Part 1, October 2019

- *14. Protect, conserve and enhance the historic environment* – significant development at Sprucefield will divert investment from Lisburn City Centre and other town centres in the Council area, leading to an increase in vacancy and dereliction in the historic environment of these town centres.

In the light of the above points Strategic Policy SMU03 for the Sprucefield Regional Shopping Centre is inappropriate whereby the quantitative justification for simplistically allocating 50,000 of retail and leisure space is not soundly based. Moreover, given the “hypothetical”⁶ nature of the floorspace assessment it is all the more surprising that no restrictions are recommended by the LDP to safeguard against adverse impact, such as applying a minimum unit size and a restriction on the types of goods sold.

Recommendations for the Local Development Plan

In light of the above findings, particularly the inappropriateness of benchmarking development potential at Sprucefield with the scale and nature of development at other regional centres in GB, the following recommendations are made to improve the soundness of the LDP.

- Another development scenario should be considered whereby a greater share of projected retail floorspace capacity is reserved for the promotion of retailing in Lisburn City Centre. This is due to the fact that the preferred development scenario for Sprucefield will account for all retail capacity in the LDP council area up to 2022 and the vast majority of it up until 2027.
- Related to the above, the boundary of the Regional Shopping Centre should be amended to exclude the area of development potential to the south of the M&S Centre. This would help prevent Sprucefield growing to a size that is difficult to justify on the basis of the population/expenditure density levels found in Northern Ireland. It would also help safeguard against a gross imbalance of facilities with Lisburn City Centre and other city and town centres.
- So too, in the absence of regional guidance on the role of Sprucefield Regional Shopping Centre, the LDP should take on board the precautionary approach advanced in the RDS for major proposals in out of centre locations. In this respect, if further development at Sprucefield is justified, it should adopt Key Site Requirements specifying a minimum unit size (e.g. 1,000 gross sqm) and restriction on the type of goods sold (bulky durable goods only).
- Finally, the LDP should make it clear that any further major development at Sprucefield will be contingent upon traffic signalisation of the Sprucefield junction. As it currently stands, this busy interchange is a traffic hazard for pedestrians and cyclists alike.

⁶ Para 7.4.4, Local Development Plan Technical Supplement 5: Retail Capacity Study, October 2019