

Form for the Submission of a Representation to the Development Plan Document



**Local Development Plan
Representation Form
(Plan Strategy)**

Ref:
Date Received:
(for official use only)

Name of the Development Plan Document (DPD) to which this representation relates

Lisburn and Castlereagh City Council Draft Plan Strategy

Please complete separate form for each representation

SECTION A

1. Client Details

2. Agent Details (if applicable)

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

	Director	
Lagmar Properties Limited		Turley
19 Clarendon Road		Hamilton House
Belfast		3 Joy Street
		Belfast
BT1 3BG		
c/o agent		

SECTION B

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the DPD does your representation relate?

- (i) Paragraph 3.1-3.12 & 4.1-4.16
- (ii) Policy Strategic Policy 11
- (iii) Proposals Map _____
- (iv) Site Location _____

4(a). Do you consider the development plan document (DPD) is:

Sound Unsound

4(b). If you consider the DPD to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

Soundness Test No.

5. Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

If you consider the DPD to be sound and wish to support the DPD, please set out your comments below:

(Continue on a separate sheet if necessary)

6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

See enclosed representation

(Continue on a separate sheet if necessary)

7. If you are seeking a change to the DPD, please indicate if you would like your representation to be dealt with by:

Written Representation Oral Hearing

Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Signature:

[Redacted Signature]

Date:

9/1/2020

Lisburn & Castlereagh City Council Draft Plan Strategy

Representations on behalf Lagmar Properties
Limited

January 2020

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Client
Lagmar Properties Limited
Our reference
LAGB3004

8 January 2020

Executive Summary

1. This representation is submitted on behalf of Lagmar Properties Limited who welcomes the opportunity to submit comments on the draft plan strategy issued by Lisburn and Castlereagh City Council (LCCC).
2. Lagmar Properties Limited are owners of the former Rolls Royce factory complex on the Upper Newtownards Road, Belfast.
3. Lagmar Properties Limited support the ambition and drive of LCCC in terms of its vision for the Council area however, having reviewed and considered the Local Development Plan, we consider the Plan to be unsound.
4. The table below summarises the changes sought.

Schedule of key draft Policy Comments

Policy	Comment	Cross ref.
Strategic Policy 11 – Strategic Employment Allocation	The Council has failed to provide sufficient evidence to justify its proposed allocation of 220 hectares of employment land and how its approach addresses the requirements set out in the RDS and SPPS The draft policy therefore fails against soundness tests C1, C3 and CE2	Paragraphs 3.1 to 3.12
Strategic Policy 11 – Local Employment Sites	The Council has failed to provide sufficient evidence to justify the decision to carry an employment zoning from draft BMAP into the new Local Development Plan. We seek that these lands are dezoned or alternatively identified for mixed use development The draft policy therefore fails against soundness tests CE2 and C3	Paragraphs 4.1 to 4.16

1. Introduction

- 1.1 Turley submits this representation on behalf of Lagmar Properties Limited, owners to the former Rolls Royce factory site and welcomes the opportunity to return comments on the Lisburn and Castlereagh Draft Plan Strategy.
- 1.2 In line with Council's procedures, each representation is set out on a separate page within each of the Chapter headings with the policy clearly identified.
- 1.3 The structure of the submission is as follows:
 - **Chapter 2:** Provides an assessment of how the draft Plan Strategy addresses the legislative compliance tests; and
 - **Chapter 3:** Details our representations on Strategic Employment Allocation under Strategic Policy 11; and
 - **Chapter 4:** Details our representation on Local Employment Sites under Strategic Policy 11.

2. Legislative Compliance

2.1 In preparing their draft Plan Strategy (dPS), Lisburn and Castlereagh City Council ('the Council') is required to adhere to the provisions of:

- The Planning Act (Northern Ireland) 2011 ('Act'); and
- The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 ('Regulations').

2.2 This section identifies concerns in the compliance of the dPS with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

2.3 Part 2 of the Act stipulates that the Plan Strategy should be prepared in accordance with the Council's timetable, as approved by the Department for Infrastructure ('Dfi') and in accordance with the Council's Statement of Community Involvement.

2.4 The Council's Local Development Plan (LDP) Timetable, as approved is publicly available on their website; dated November 2018. We acknowledge that the dPS was published within the timeframes set out in the timetable of Q3 2019 to Q2 2020. We note that this timeframe is also to include for the review of representations received and the consultation period for site specific counter-representations. In line with guidance issued by Dfi, we recommend that Council carefully monitors this time period to ensure that that all phases of the LDP are undertaken within the approved timelines agreed by Dfi.

3. Strategic Policy 11 - Strategic Employment Allocation

- 3.1 The Strategic Employment Allocation set out on page 77 identifies that there is currently 220 hectares of developable land within zoned sites¹. In preparing the draft Plan Strategy, the Council commissioned an Employment Land Review to quantify the amount of land required to assist in delivering the level of anticipated new jobs within the Council area.
- 3.2 In line with guidance, set out in Development Plan Practice Note 6² a number of different scenarios were assessed, 5 in total. These scenarios estimated that the land requirements for employment space could range from 12.64 hectares to 44.85 hectares over the Plan period.
- 3.3 The draft Plan Strategy acknowledges that having considered the findings of the Employment Land Review that the Council have decided to opt with the output from scenario 5 which identified the need for 44.85 hectares over the plan period. As noted in the draft Plan text, Council are of the opinion that this figure is a robust indicator given that it is *based on past completions and is therefore considered to be a likely forecast of the level of demand over the plan period*³.
- 3.4 Yet, having undertaken this analysis the Council then outlines its intention to retain the current level of undeveloped lands which equates to 220 hectares of zoned employment land. We also note that the strategic mixed use sites are excluded from this figure which, in practice, means that the Plan is proposing that almost 300 hectares of land is to be allocated for employment uses.
- 3.5 Using the Council's preferred approach of past completion rates, the level of employment land proposed within the draft Plan Strategy would provide for 100 years (300 hectares divided by 2.99 hectares; 2.99 hectares is the annual gross development rate referenced in Table 6.11 within technical supplement 30), against a requirement to provide lands for 15 years.
- 3.6 We note that the draft Plan Strategy acknowledges that the level of employment land is more than sufficient and goes beyond the 15 year lifespan of the Plan⁴. Council support this position by pointing to the policy direction set out in the Regional Development Strategy 2035 (RDS) and the Strategic Planning Policy Statement (SPPS); that employment lands should offer a variety of sizes in a range of location across the Council area, in locations which are accessible via key transportation routes. The RDS, policy RG1 refers to an **adequate** supply of employment land to facilitate sustainable

¹ The draft Plan Strategy refers to 'zoned sites' however a number of the sites in question are not zoned within the relevant extant Local Development Plan. We acknowledge that within the draft Belfast Metropolitan Area Plan (BMAP) 2015 the sites are identified as zoned employment sites but would caution that this plan is not adopted

² Version 2 published May 2017

³ Page 77 of draft Plan Strategy

⁴ Page 82 of draft Plan Strategy

growth. The policy sub text clearly references that Plans need to **assess the quality and viability** of employment sites (page 31, RDS). [Text in bold is our emphasis].

- 3.7 Within the same paragraph, reference is made *that the policy approach adopted by the Council aims to **positively plan** to support the employment needs of the area, so that the local economy is not unduly constrained over the Plan period.* In opting this approach the Council has failed to consider the consequences on the local economy of development sites which are being blighted as a direct result of being zoned for employment use when there is no/limited market demand which can be satisfied.
- 3.8 The evidence base prepared by Lichfields highlights two pertinent facts regarding changes in the employment market:
- The largest jobs growth area was in health and social work activities which accounts of 19.9% of jobs followed by the wholesale and retail trade which accounted for 18.9% of jobs. Neither of these uses are B class jobs.⁵
 - Within the B class jobs sector, there have been significant changes in the past 24 years. There has been an increase in the number of jobs in the B1 sector (63.3%) and B4 sector (27.5%) but decreases in the B2/B3 sectors (21.6%).⁶
- 3.9 Having reviewed the draft Plan Strategy and its accompanying Technical Supplement 3 – Employment Land we can find no explanation or rationale for the retention of the current level of undeveloped lands or, that consideration was given to the evidence collated regarding the changes in the employment market.
- 3.10 Having identified the amount of land required over the Plan period, we would have expected that the Council would have assessed the existing sites and determined which were to be retained to meet the expected level of demand and potentially rezoned sites which were failing to deliver employment developments.
- 3.11 In its current form, we find the draft Plan Strategy to be unsound and fails:
- *Soundness Test C1 – Did the Council take account of the Regional Development Strategy?*

The Regional Development Strategy directs that in the consideration of employment land an adequate supply should be identified which is of a quality that addresses the needs of business and economic viable. The identification of a strategic employment allocation which is almost 5 times higher (7 times, if strategic sites are included) than that identified from the employment land review is excessive and does not reflect the spirit of the word ‘adequate’, nor has any consideration been given to economic viability.
 - *Soundness Test C3 – Did the Council take account of policy and guidance issued by the Department?*

⁵ Point 6, page 21 – Technical Supplement 3

⁶ Point 8, page 21 – Technical Supplement 3

Paragraph 6.92 of the SPPS requires that Local Development Plans ensure that there is an ample supply of land to meet economic need within the plan area. The identification of a strategic employment allocation which is almost 5 times higher than that identified from the employment land review is excessive and does not address the policy requirements set out.

- *Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base*

The strategic employment allocation of retaining 300 hectares of undeveloped employment land fails to take account of the evidence base the Council prepared both in terms of the overall strategic allocation (the five growth scenario), the market analysis set out on page 37⁷ and the potential contribution that individual sites could make.

- 3.12 We respectfully recommend that the Council reconsiders its approach, mindful of the evidence prepared by Lichfields as to the overall quantum of lands required balanced against the changes in the employment market (as outlined in paragraphs 3.27 to 3.33 of the technical supplement).
- 3.13 In identifying the strategic allocation consideration should be given to whether sites currently identified for employment use, based on the individual site assessments undertaken by Lichfields have a reasonable prospect of making a meaningful contribution to future economic growth (Tables 7.2 and 7.3 of technical supplement 3).

⁷ Technical Supplement 3: Employment Land Review

4. Strategic Policy 11 - Local Employment Sites

- 4.1 The Plan Strategy identifies approximately 220 hectares of employment land remaining to be developed across the Council area. The 220 hectares consists of 30 sites identified in draft BMAP as being zoned for employment use, and is separate to the lands identified at West Lisburn and Purdysburn as strategic mixed use sites. Collectively, the draft plan strategy proposes over 300 hectares of land for employment uses.
- 4.2 We note that as part of the baseline review, 20 out of the 30 sites were assessed by Lichfields and scored in terms of access, site context, environment and market strength; no details or explanation is provided as to why 10 sites were not assessed.
- 4.3 The draft Plan notes that *the majority of the sites scored an average to high score and that it is anticipated that the different locations will appeal to a range of businesses and sectors (page 82, final paragraph).*
- 4.4 The intention outlined in the draft Plan is to continue these proposed zonings into the new Local Development Plan for the Council area, with little to no consideration of the individual site assessments prepared to support the draft Plan or indeed the key findings from the Employment Land Review.
- 4.5 It is current form, we find the draft Plan Strategy to be unsound and fails:
- *Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base*
- In its current format, we find the draft Plan Strategy to be unsound, as the plan fails Soundness Test CE2 in that the allocations are not realistic or appropriate having considered the evidence presented in Technical Supplement 3.
- *Soundness Test C3 – Did the Council take account of policy and guidance issued by the Department?*
- Paragraph 6.94 of the SPPS requires that Local Development Plan should also identify opportunities for mixed use development, including economic development uses, where this would create synergy and underpin the economic viability of the development as a whole.
- 4.6 Below and overleaf we set out our rationale for this statement and outline the changes sought.
- 4.7 Lichfields completed an assessment of two thirds (20) of these sites. Each site was assessed against a set of criteria and awarded an overall score. The overall score was then used to rank the sites as 'good', 'average' or 'poor'. Detailed overleaf is an extract from the report identifying which sites were assessed.

Site	Area available for additional employment use (ha)	Overall score
Good		
ML06 Dunmurry and Derriaghy Industrial Estates, Metropolitan Lisburn	5.27	30
LC09 Knockmore Hill/Business Park, Ballinderry Road/Knockmore Road, Lisburn City	17.74	30
LN07 Glenavy Road, Moira	11.80	29
CF05 Ballynahinch Road, Carryduff	11.29	29
MCH12 Forster Green, Saintfield Road, Castlereagh	0.20	28
CF09 Saintfield Road, Carryduff	0.47	28
Average		
MCH06 Dundonald Industrial Estate/Inspire Business Centre, Carrowreagh / Land at Upper Newtownards	23.08	27
MCH05 Land South East of Millmount Road, Comber Road, Metropolitan Castlereagh	8.56	27
LC14 Lissue Industrial Estate, Moira Road, Lisburn City	3.73	27
MCH07 Newtownbreda Factory Estate, Cedarhurst Road, Metropolitan Castlereagh	0.00	27
LC10 Blaris Industrial Estate, Altona Road, Lisburn City	0.77	26
MCH13 Knockbracken Healthcare Park, Saintfield Road, Castlereagh	44.01	25
CR01 Maryland Industrial Estate, Crossnacreevy, Castlereagh Countryside	0.11	25
MCH08 Industrial Estate, Beechill Road, Metropolitan Castlereagh	0.38	24
CF06 Lands at Comber Road, Carryduff	5.26	24
Poor		
LC05 Blaris Road, Lisburn	60.0	23
ML05 Seymour Industrial Estate, Metropolitan Lisburn	4.73	23
GY05 Land North West of Gobrana Road, Glenavy	6.27	22
LC07 Lissue Road, Lisburn City	10.86	22
LC08 Barbour Threads Mill, Mill Estate, Lisburn City	2.83	22

Extract from Technical Supplement 3 – Employment Land Review

- 4.8 A total of 12 of the sites (MC06, LCO9, MCH12, CF09, MCH06, MCH05, MCH07, LC10, MCH08, CF06, ML05 and LC08) scored well in relation to proximity to residential areas and community facilities. This is a particularly important consideration for B class uses which typically support larger numbers of jobs per square metre, i.e. B1 (office and R&D) and B2 (light industry). It is noted that through the delivery of the Knockmore Link, that the accessibility credentials of a number of sites within Lisburn will significantly improve. Moreover, the Technical Supplement notes that while there needs to be a range of sites of varying sites and in different locations, it's the sites within Lisburn close to the M1 which are of the highest value in terms of market demand.
- 4.9 In deciding to carry zonings from draft BMAP into the new Plan, we would have expected Council to have used the evidence base collated, particularly the points identified above to:
- fully evaluate the sites and consider when sites would start to make a meaningful contribution to supporting B class jobs in the Council area; and

- establish whether any sites should be rezoned to mixed use in line with the direction set out in the SPPS which acknowledges that this is an appropriate course of action in instances where economic viability is an issue.
- 4.10 The SPPS requires, that draft Plan Strategies should identify opportunities for mixed use development in locations that are well served by public transport, accessible by walking and cycling, have adequate infrastructure and can be properly integrated in terms of land use and design. From our review of the draft Plan strategy, Council has failed to fully consider this aspect particularly when consideration is given to the substantial existing land portfolio.
- 4.11 The Lichfields assessment notes that there are barriers which are preventing some employment lands from being developed, a mixture of site specific constraints such as topography and roads access (both local and motorway access) to a lack of market demand/appetite. The Lichfields assessment specifically notes that Council *should give consideration to the scope to which existing legacy estates and sites no longer productive for employment uses might be better placed to support non B class uses in the future. In this case, sites such as MCH06 (Dundonald) and LC10 have been zoned for employment uses for a number of years but have not come forward or are characterised by non employment uses. It will be for LCCC to decide whether these sites are likely to come forward for employment or whether they should be redeveloped for other uses, or a proportion of the site developed as mixed use⁸*. Despite Lichfields recommendation, there is little to no evidence within the draft Plan which demonstrates how Council analysed this information to justify the continued retention of significant portions of land as draft employment zonings.
- 4.12 As currently presented, we would query how Council’s Strategic Policy 4 – Supporting Sustainable Economic Growth can be achieved, if, in the main Council is proposing to recycle draft plan zonings which have not been fully assessed. A key aspect of the new Local Development Plan process requires Councils’ to demonstrate that the proposed zonings are suitable, available and viable; this analysis has not been provided.

MCH06 – Dundonald Industrial Estate/Inspire Business Centre, Carrowreagh/ Land at Upper Newtownards Road

- 4.13 The zoning of MCH06 comprises a number of parts, including the Dundonald Industrial Estate; lands at Carrowreagh Business Park and Inspire Business Centre which have all been developed; the former Rolls Royce factory site and undeveloped lands to the rear of the Inspire Business Centre.
- 4.14 Our client, Lagmar Properties Limited owns a portion of the lands within this zoning; the former Rolls Royce factory site. We have had the opportunity to review the information collated and prepared by Lichfields concerning the site, in particular the detailed site assessment enclosed at pages 79 – 81; Appendix 3 of the Employment Technical Supplement.
- 4.15 Below and overleaf, we have reproduced the site assessment and added our comments (noted in italics) drawing on information prepared in support of the previous planning application LA05/2017/1206/O which was subsequently withdrawn.

⁸ Paragraph 8.17, Page 59 of Technical Supplement

Site Address: Dundonald Industrial Estate/Inspire Business Centre, Carrowreagh / Land at Upper Newtownards			
Site Ref: MCH06	Location: Dundonald	Nearest Settlement: Dundonald	Total area: 34.90ha Developed: 11.82ha Remaining: 23.08ha
Criteria	Comment		Score
Road Access	<p>The southern part of the site, which includes the Dundonald Industrial Estate and the land formerly occupied by the Rolls Royce factory, is accessed from Ballyoran Lane. The central section, which includes Carrowreagh Business Park and the Inspire Business Centre, is accessed from Carrowreagh Road. The greenfield area at the north of the site could be accessed from either/both Ballyoran Lane and/or Carrowreagh Road.</p> <p>Ballyoran Lane and Carrowreagh Road adjoin the A20, which forms the southern border of the site.</p> <p><i>Lagmar Properties Limited Comments</i> <i>In November 2017, CBRE undertook an assessment of employment lands within Castlereagh and East Belfast⁹. With reference to the former Rolls Royce site they noted that 'the application site is considered slightly remote from the main motorway network and local traffic conditions do not make the site immediately accessible for business space operators. This sentiment is noted within the technical supplement and the feedback received from the commercial property agents' workshop identified that consideration should be given to 'access to motorways' as an assessment criteria in identifying employment lands</i></p>		3
Public Transport Access	<p>Nearest bus stop is adjacent to the site on the A20. Services to Belfast approx. every 30 minutes. No railway station in the vicinity.</p> <p><i>Lagmar Properties Limited Comments</i> <i>The site is within 10 minutes' walk of the Gilder hub at Dundonald Park & Ride and increased services within neighbouring residential areas has improved access via public transport</i></p>		2
Pedestrian/Cycle access	<p>Pedestrian footways on Ballyoran Lane and Carrowreagh Road. Shared pedestrian/cycle paths on the A20.</p>		3

⁹ Copy of assessment enclosed in Appendix 1

	<u>Lagmar Properties Limited Comments – no comments</u>	
Proximity to residential areas and community facilities	<p>Residential area immediately to the east of Carrowreagh Road. Community facilities include a gym within the site, Dundonald High School immediately to the west of the site, a primary school to the south of Upper Newtownards Road (approx. 500m away), a supermarket (approx. 1km away) and Ulster Hospital (including A&E) (approx. 1.6km).</p> <p><u>Lagmar Properties Limited Comments</u> As noted above, the zoning is within an area which over time has evolved into a mixed use area comprising education, medical, employment and residential uses</p>	3
Brown/Greenfield status	<p>15.78ha greenfield out of a total of 34.93ha (45% greenfield).</p> <p><u>Lagmar Properties Limited Comments – no comments</u></p>	2
Adjoining Uses	<p>Fields and farm buildings to the north. Carrowreagh Road to the east with residential use on the other side of the road. The A20 to the south with mainly residential on the other side of the road. Dundonald High School to the west.</p> <p><u>Lagmar Properties Limited Comments</u> The land uses adjacent to the former factory site comprise residential development to the south and east of the site and industrial/employment to the north and west of the site</p>	2
Proximity to Infrastructure	<p>Existing employment use indicates that utility infrastructure is likely to be available, although this has not been confirmed.</p> <p><u>Lagmar Properties Limited Comments</u> While planning application LA05/2017/1206/O was withdrawn, the process demonstrated that there were no insurmountable constraints</p>	3
Landscape and environmental designations	<p>Site's northern boundary adjoins Area of High Scenic Value (BMAP 2015) - Ref. COU5/09 and Area of Constraint on Mineral Developments (Draft BMAP 2015) – Ref. COU8/09. Northern boundary is in proximity (approx. 90m) to ASSI – Ref. ASSI164.</p> <p>Site is within Site of Local Nature Conservation Importance (BMAP) – Ref. MCH28/05 (estimated to be less than 5% of site) and Area of Constraint on Mineral Developments (Draft BMAP 2015) - Ref. CR07/11.</p> <p>Site is within Local Landscape Policy Area: MCH33 Dunlady Glen (estimated to be less than 5% of site).</p> <p>The site is not within an LCCC Landscape Wedge.</p> <p><u>Lagmar Properties Limited Comments -There are no landscape or environmental designations affecting the former Rolls Royce site</u></p>	2

	<p>No TPOs on or adjoining site.</p> <p><u>Lagmar Properties Limited Comments – as per above</u></p>	3
Topography	<p>Undulating site. Contours indicate that the site slopes uphill to the north east, with 30m elevation gain over 300m distance.</p> <p><u>Lagmar Properties Limited Comments</u> <i>These comments relate to the lands to the rear of Inspire Business Centre. The former Rolls Royce site is a relatively flat site with the exception of a few pockets where there are localised level differences; the changes in topography can be addressed via a sympathetic design approach</i></p>	1
Flood Risk (mapping)	<p>Site is outside extent of Dec 1978 flood. The site is not within the present day sea floodplain but adjoins the present day river floodplain and is within the present day surface water floodplain (estimated to be less than 20% of site).</p> <p><u>Lagmar Properties Limited Comments</u> <i>While planning application LA05/2017/1206/O was withdrawn, the process demonstrated that there were no insurmountable constraints</i></p>	2
Market strength	<p>No evidence of market interest in additional employment use at the site.</p> <p>The former Rolls Royce factory site (now cleared), which extends to approx. 7ha, is owned by Lagmar Properties Limited. The site has been vacant since the closure of the factory in 2005. This area has been subject to market interest in residential-led mixed-use development, including a neighbourhood centre (LA05/2017/1206/O – subsequently withdrawn) and in the past has been subject to interest for retail development (Y/2010/0087/O and LA05/2015/0444/PAD). It is understood that a new residential-led application is being prepared. The greenfield area in the north of the site has remained undeveloped since being zoned in the Belfast Area Plan 2001.</p> <p>There are numerous vacant units within the Inspire Business Centre, which forms part of the site. A change of use to D1 (gymnastics club) has been permitted for one existing unit at the site.</p> <p>Site first zoned for employment in the Belfast Urban Area Plan (2001).</p> <p><u>Lagmar Properties Limited Comments</u></p> <p><i>Prior to the withdrawal of LA05/2017/1206/O, an earlier application submitted jointly on behalf of Sainsbury's Supermarket Ltd and Lagmar Properties secured planning permission in June 2013 for a 9,400 sq. metres foodstore complemented by 6,400 sq. metres of employment space.</i></p> <p><i>In granting planning permission, the Department of Environment, having considered a Development Viability Assessment and Market Demand Analysis acknowledged that delivering a policy compliant proposal would render the development site unviable and would result in catastrophic losses; refer to comments at page 9 of the report in Appendix 2; DoE Case</i></p>	1

Officers Report. In order to create an economically viable proposal, a mixed use development approach was required based on a foodstore complemented by employment space (mix of B2 and B4). Given the high values being secured at that time for retail proposals, the inclusion of a significant level of retail floorspace underpinned the viability of the proposal. Having secured planning permission, the economic climate changed as a result of the property crisis and the proposal was not pursued

CBRE's market assessment undertaken in November 2017 to support planning application LA05/2017/1206/O highlighted a number of reasons as to why the site was not attracting any market interest. The text below is a summary of their assessment which can be found in Appendix 1.

Strategic Context of Employment Space

- *There are no manufacturing based companies which would seek to develop the site; given its location and the wider context of the manufacturing market within Northern Ireland*
- *It is accepted that that older, more traditional locations can be redeveloped to cater for the needs of the knowledge based economy, however this will only occur in locations which are highly accessible to motorways/gateways; the application site is not*
- *Knowledge based businesses tend to locate in locations where there are similar business operations which collectively creates a clustering effect. The close proximity of similar businesses is again an important consideration. The site does not share these qualities*
- *Within the employment space hierarchy, Dundonald is a low order location serving local businesses*

(A number of these points resonate with the commentary noted in the Lichfields Assessment)

Vacant units within adjoining Business Parks

- *In 2017 and previously under planning application Y/2010/0087/O it was demonstrated that there were vacancies within the Inspire Business Park; further information is contained within Appendix 1*
- *It is worth noting that Inspire Business Centre is a registered charity which is able to offer leasing terms that the private sector could not provide. The leasing terms offered by Inspire are generally on the basis of rolling leases in contrast to a 5 year term that would be the norm within the private sector. This is an important consideration when reflecting on vacancy*

	<p><i>rates, as it highlights that the vacancies are not related to future tenants considering that the overheads are too expensive rather it points to a lack of demand for the accommodation which is available and furthermore highlights the challenges surrounding economic viability in developing a B2 or B4 proposal</i></p> <p><i>Viability</i></p> <ul style="list-style-type: none"> <i>A lack of market interest for employment uses significantly impacts on the viability of these lands. While planning permission was secured under Y/2010/0087/O, it was the retail element of the proposal which provided the necessary level of viability to make the project economically sustainable, a point acknowledged by the Department of Environment in granting planning permission (refer to Appendix 2 for an DoE Case Officers Report, page 9)</i> <i>CBRE in their assessment of the site in 2017 (paragraph 5.8, Appendix 1) concluded that the continued retention of the site as a zoned employment site would only serve to blight the redevelopment potential of the lands given the economic challenges in delivering a viable proposal</i> 	
<p>Overall comments</p>	<p>There are a range of uses within the surrounding area and in close proximity to the site, including the Inspire Business Park, the Lloyds banking office, Dundonald High School and the established residential area and community facilities. The site may be suitable for development for a range of B1-B3 uses, although it appears that market interest in employment uses is low.</p> <p><u>Lagmar Properties Limited Comments</u> <i>We would remind Council of the comments made at paragraph 8.17, page 59 of the technical supplement regarding the consideration that ought to be given to legacy sites which are no longer productive for employment uses. The continued identification of these lands, which have been actively marketed for over 16 years for employment use will only serve to blight the site and stymie the regeneration potential of the lands</i></p>	<p>27</p>

- 4.16 There is compelling evidence within the Technical Supplement, combined with further evidence from two previous proposals which clearly demonstrates the significant lack of market interest in the lands; the requirements for employment space within LCCC and Dundonald's positioning within that hierarchy; and the changes in the surrounding area in terms of land uses from a predominately industrial area adjacent to Ballybeen

to a mixed use area. This evidence combined with the policy direction set out in the SPPS of supporting the identification of mixed used sites runs contrary to position adopted by Council and accordingly the Plan is unsound.

- 4.17 We respectfully ask that Council reconsiders the proposal to carry the zoning (MCH06) from draft BMAP into the new LDP as a zoned employment site. We ask that consideration is given to identifying the former Rolls Royce factory site for an alternative use or zoning the lands for mixed use development.

**Appendix 1: Employment Land Assessment
prepared to support
LA05/2017/1206/O**

Employment Land Assessment

Former Rolls Royce Factory Site,

Upper Newtownards Road, Dundonald

November 2017

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Client
Lagmar Properties Ltd

Our reference
LAGB3004

November 2017

1. Introduction

- 1.1 Turley has been instructed by Lagmar Properties Ltd to prepare this Employment Land Assessment in support of an outline planning application for a residential-led mixed use development on lands at the former TK-ECC, Upper Newtownards Road, Dundonald.
- 1.2 The application seeks planning permission for:
- 1.3 *Proposed residential development comprising a mix of apartments, townhouses, semi-detached and detached properties with integral open space including an equipped children's play park; a neighbourhood centre comprising a mix of uses including a local convenience store together with 3 smaller retail units (Class A1), a coffee shop (Sui Generis) at ground floor, and provision of floorspace for community and cultural uses (Class D1) at first floor level with associated car parking; improvements to site access from Carrowreagh Road and works to the public road including provision of a right turn lane; landscaping; and other ancillary works*
- 1.4 The Design and Access Statement provides a detailed analysis of how the proposal responds to the surrounding environs and has been influenced by the feedback received from stakeholders. The Planning Statement identifies the relevant planning policies for consideration in the determination of the application and demonstrates how the application addresses policy, and the weight to be attached to material considerations.
- 1.5 The application site is unzoned land within the development limit for Belfast, as defined within the extant Local Development Plan (LPD) - the Belfast Urban Area Plan (BUAP) 2001. While the site is unzoned, it was previously used for industrial/employment uses and within the draft Belfast Metropolitan Area Plan (dBMAP) is zoned for employment use.
- 1.6 The proposal involves the development of a non-policy compliant scheme. This report has been specifically prepared to demonstrate that the proposal does not prejudice the strategic objectives of Planning Policy Statement 4 (PPS) – Planning & Economic Development and complies with the policy tests set out in the Strategic Planning Policy Statement (SPPS).
- 1.7 Against this background, this report has been prepared and provides the following:
- An assessment of the zoned employment land supply.
 - An examination of the level and nature of demand for employment sites and premises in the local area.
 - An assessment of the site's suitability as a business space location/site for employment use.
- 1.8 The report then draws upon the conclusions of these assessments to consider the appropriateness of the proposed development against the policy requirements set out in PPS 4 and the SPPS.

- 1.9 It is important to note that this is not the first time a non-policy compliant proposal has been advanced on the application site. An application for the *demolition of existing buildings and structures and the construction of a retail store (Class A1); petrol filling station (sui generis); industrial units (Class B2 and B4); hotel (sui generis) and associated highway, footpath, landscape and other works and improvements* was submitted to the Department of the Environment (DoE) in March 2010 on behalf of Sainsbury's Supermarkets and Lagmar.
- 1.10 In granting outline planning permission, the DoE accepted that the lands would be sterilised if a policy compliant application was pursued. The outline approval for an alternative use provided for economic, social and environmental benefits which could not have been realised through the development of a B Class employment use. Once again, it is against this backdrop that a non policy compliant scheme is pursued. Further details on the planning case are set out in the Planning Statement.

2. Planning Policy Context

2.1 This section provides a summary of the policies and guidance relevant to the application site and this particular assessment. A full overview of the policy context is provided in Section 3 of the accompanying Planning Statement.

2.2 The key planning documents relevant to this assessment are:

Regional

- The Regional Development Strategy 2035;
- The Strategic Planning Policy Statement (SPPS), September 2015; and
- Planning Policy Statement 4 (PPS4) – Planning and Economic Development, November 2010.

Local

- The Belfast Urban Area Plan 2001 (BUAP), December 1989; and
- Draft Belfast Metropolitan Area Plan 2015 (dBMAP), November 2004.

Regional

Regional Development Strategy 2035

2.3 The RDS 2035 provides strategic level policies to guide development in Northern Ireland up to 2035. It does not prescribe operational policy, which is the role of the suite of PPS and the SPPS. Rather the RDS provides two forms of strategic guidance:

- Regional Guidance (RG) – This applies to everywhere within Northern Ireland (NI) and is presented under the three sustainable development themes of Economy, Society and Environment; and
- Spatial Framework Guidance (SFG) - This is additional to the NI wide guidance and is tailored to each of the five elements of the Spatial Framework.

2.4 RG1 seeks to ensure an adequate supply of land to facilitate sustainable economic growth. RG1 is supported by four elements:

- An assessment of the quality and vitality of sites zoned for economic development uses within LDPs - the focus being on effective and regular monitoring of sites to ensure that lands zoned for economic development are delivering an effective level of supply
- The protection of lands zoned within LDPs – zoned land is a valuable resource for local and external investment and contributes to the aims of the PfG. Protecting zoned sites will provide for a variety of *suitable* sites across NI (italics is our emphasis)

- The importance of promoting economic development opportunities across the Region focused on the Belfast Metropolitan Urban Area (BMUA), Londonderry and Hubs as the main centres for employment and services. The objective being to capitalise on the development opportunity provided by the concentration of people and goods combined with available infrastructure and the clustering of a range of business services essential to economic development
- Promoting an network of economic development opportunities – making provision within LDP for an adequate and continuous supply of land for employment purposes.

2.5 SFG1 seeks to promote urban economic development at key locations throughout the BMUA and ensure sufficient land is available for jobs. The guidance identifies that employment opportunities need to be considered in a holistic manner and recognises the role that component parts play; builds on planning regeneration initiatives and maximises the use of existing and planned infrastructure provision. Specifically, SFG1 identifies key locations for economic growth which should be protected and strengthen. These locations include Belfast Harbour Area, including Titanic Quarter; West Lisburn/Blaris; Purdysburn; Global Point/Ballyhenry. Notably, the application site locality is not mentioned.

Planning Policy Statement 4 (PPS 4): Planning and Economic Development

2.6 PPS4 sets out the regional planning policies for economic development and uses. The policy seeks to facilitate and accommodate economic growth in ways compatible with social and environmental objectives and sustainable development.

2.7 Policy PED7: Retention of Zoned Land and Economic Development Uses is relevant in the consideration of this development proposal. The policy contains 2 discrete policy tests depending on whether the lands are zoned for employment use within a LDP or whether the lands are unzoned, but were land used for an employment use.

2.8 In respect of zoned sites, there is a clear policy presumption that development proposals which result in the loss of land or buildings zoned for economic development will not be permitted, unless the zoned land has been substantially developed for alternative uses. The policy does provide for an exception for sui generis employment uses.

2.9 On unzoned land, development proposals that would result in the loss of an existing Class B2, B3 or B4 use, or land last used for these purposes, will only be permitted where it is demonstrated that one of the seven exceptions set out in the policy can be met.

Strategic Planning Policy Statement (SPPS)

2.10 The provisions of the SPPS apply to the whole of Northern Ireland and are material to the determination of individual planning applications. The existing suite of Planning Policy Statements will remain operational and be cancelled once a Council adopts their new Plan Strategy.

- 2.11 Under the SPPS, the guiding principle for planning authorities in determining planning applications is that sustainable development should be permitted having regard to the development plan and all other material considerations unless the proposed development will cause demonstrable harm to interests of acknowledged importance (paragraph 3.8).
- 2.12 Importantly, should any conflict arise between the SPPS and any policy retained under the transitional arrangements, the conflict must be resolved in favour of the policy provisions in the SPPS.
- 2.13 It is our assessment that the policy provisions set out in the SPPS are broadly similar to those within PPS4 with the exception that the SPPS provides an implied degree of discretion which planning authorities can exercise in determining applications on zoned employment site.
- 2.14 Paragraph 6.89 outlines the importance of retaining economic development land and buildings and that planning permission should not normally be granted for proposals that would result in the loss of land zoned for economic development use. The use of the word 'normally' is taken to provide an opportunity for planning authorities to grant planning permission for alternative development proposals in instances where the zoned lands are no longer well located and suited for employment uses. The latter part of paragraph 6.89 also references that Councils may wish to retain flexibility to consider alternative proposals that offer community, environmental or other benefits that are considered to outweigh the loss of land for economic development use.

Local Development Plan (LDP)

- 2.15 There has been a significant change in the LDP context since May 2017. Prior to 19 May 2017, the extant LDP relevant to the site was set out in the adopted Belfast Metropolitan Area Plan (BMAP) 2015. In the intervening time, the Court of Appeal, on foot of a legal challenge to the Plan found the process of adoption of BMAP to be unlawful.
- 2.16 Paragraph 14 of the judgement clearly states that *'the Minister's decision to adopt BMAP was, for all the reasons clearly articulated by Treacy J, ultra vires. The purported adoption was accordingly of no force or effect; the draft BMAP remains in its entirety unadopted'*
- 2.17 The consequence of the Court of Appeal judgement is that the adoption of BMAP has been quashed and it no longer constitutes the statutory development plan for the purposes of the planning legislation. It follows that the plan making process steps back to the point prior to the adoption of the Plan. The status of draft BMAP and the subsequent stages of the plan making process are considered further below.
- 2.18 The lawfully adopted statutory development plan for the purposes of planning legislation is the Belfast Urban Area Plan (BUAP) 2001. Whilst beyond its stated end date, its policies and designations will continue to be applied in the determination of a planning application until Council adopt its new Plan Strategy, unless BMAP is lawfully adopted in the intervening period.

Belfast Urban Area Plan (BUAP) 2001

- 2.19 The application site is unzoned land within the settlement limit of Belfast. The BUAP does contain an Industry and Commerce Strategy which despite the age of the document is relevant in the consideration of this application and employment land assessment.
- 2.20 The relevant objectives of the strategy include to:
- Provide a physical framework within which job creation and industrial development may take place.
 - Allocate sufficient land throughout the urban area to meet the needs of industry and commerce.

Draft Belfast Metropolitan Area Plan 2015 (dBMAP)

- 2.21 The application site is identified as a zoned employment site and forms part of a wider zoning MCH 09. The Key Site Requirements (KSR) attached to the zoning state:

'Development shall only include light industrial uses currently specified in Use Class 4 of Planning (Use Classes) Order (Northern Ireland) 1989 as amended; general industrial uses currently specified in /Use Class 5 of the same Order; and storage and distribution uses currently specified in Use Class 11 of the same Order. Only light industrial uses shall be acceptable in the northern/undeveloped portion of the site adjacent to existing housing in order to protect the amenity of the residential premises'.

Employment Strategy

- 2.22 The Employment Strategy within the dBMAP seeks to sustain balanced economic growth and job creation by, inter alia, providing a generous and continuous supply of land for employment/industrial uses and promoting a balanced portfolio of employment/industrial sites throughout the Plan Area.
- 2.23 The strategy was developed in accordance with the RDS 2025, which was published in September 2001. The policy approach and designations contained¹ in the RDS 2025 are no longer a feature of current iteration of the RDS.
- 2.24 For the purposes of this assessment and the policy context for the determination for the planning application, the Employment Strategy within dBMAP is noted. Given the passage of time and change in policy direction little weight has been attached to it, with greater focus and weight given to the Spatial Framework Guidance for The Metropolitan Area centred on Belfast (as described at paragraphs 2.4 and 2.5).

Employment Allocation

- 2.25 The Plan identifies Belfast City as the economic engine for Northern Ireland and outlines that the City Centre will remain the key focus for employment within the city and that further employment growth will be primarily in the service sector. The Plan zones 47 hectares of additional employment/industry lands and mixed use in the outer Belfast City and zones 261 hectares of existing employment/industry in order to protect these from inappropriate non employment based changes of use.

¹ References to the employment hierarchy of Strategic Employment Locations (SEL); Major Employment Locations (MEL); and Key Employment Sites have long since been removed

- 2.26 Of note, the plan references that retention of existing employment/industrial sites identified in North and West Belfast will protect land for employment/industrial uses against other competing uses such as housing, and in doing so will facilitate opportunities for regeneration and employment growth. Similar comments are not attributed to other areas within Belfast, or indeed other areas within the overall plan area.
- 2.27 The plan recognises that Metropolitan Castlereagh is an important employment location and it makes provisions to further develop this role by zoning 161 hectares of employment/industry of which 68 hectares is additional to existing sites.
- 2.28 The zoned employment/industry sites are in a variety of locations to allow for a range of industry types and site choices. The plan further outlines that applications within these sites will be assessed in accordance with prevailing regional planning policy and the Key Site Requirements in the plan, where stipulated.

3. Assessment of Zoned Employment Land

- 3.1 The first objective of this Assessment was to establish the quantum of zoned employment land available within the study area; understand take up levels; and provide an estimate in years as to the amount of land remaining to be developed.

Extent of Study Area

- 3.2 For consistency with the previous application² the study area of the assessment has focused on East Belfast and the extent of the former Council area of Castlereagh as defined in dBMAP. During previous Pre Application Discussions (PAD)³ with Council in 2015, it was accepted that adopting the same study area was a logical approach to revising the employment land assessment. Plans illustrating the extent of the study area are enclosed in **Appendix 1**. These plans also identify the zoned sites considered.

Allocated Employment Land Supply

- 3.3 Within the BUAP 375 hectares of employment land is allocated across the Plan area, 40 hectares of which is within the Harbour Area. In the context of the study area, the only lands to be identified as a zoned employment site were lands to the rear of the application site.
- 3.4 Based on information provided within dBMAP, the provisions for zoned employment land in East Belfast and Castlereagh District Council areas are summarised in Tables 3.1 and 3.2 below and overleaf:

Table 3.1: dBMAP / East Belfast Industrial Land Zonings

Location	dBMAP Ref.	Proposed Employment/ Industry	Existing Employment /Industry	Total Area (Ha)
Newtownards Rd/Tamar St	BT011/01		X	3.12
Beersbridge Rd	BT011/02		X	1.14
Island Street/Ballymacarrett Rd	BT011/03		X	1.34
East Belfast Enterprise Park	BT011/04		X	0.83
Castlereagh Road	BT011/05		X	6.94
Owen O'Cork Mill, Castlereagh	BT008	X		2.40
TOTAL				15.77

² Y/2010/0087/O

³ Pre Application Discussion (PAD) reference LA05/2015/0444/PAD

Table 3.2: dBMAP / Castlereagh Industrial Land Zoning

Location	dBMAP Ref.	Proposed Employment/ Industry	Existing Employment/ Industry	Total Area (Ha)
Dundonald Enterprise Park/ Carrowreagh	MCH09		X	34.98
Newtownbreda Factory Estate	MCH10		X	2.79
Carborhill Industrial Estate	MCH11		X	2.07
Prince Regent Park	MCH12		X	18.25
Castlereagh Industrial Estate	MCH13		X	32.71
Dale Farm, Montgomery Road	MCH14		X	1.42
Ballygowan Road	MCH15		X	0.5
Purdysburn/Knock bracken	MCH07	X		58.99 ⁴
Comber Road, Millmount	MCH08	X		9.245
TOTAL				141.52

- 3.5 This provides a total figure of 15.77 hectares and 141.52 hectares for the areas of East Belfast and Castlereagh respectively. Given that the figures above were associated with the Plan publication in 2004, on the ground surveys have been undertaken to supplement this information and gain as accurate a position as possible in respect of remaining supply.

Survey Findings, Land Take Up and Remaining Supply

- 3.6 Detailed surveys of existing and proposed employment sites along with windfall sites were undertaken in November 2009 and August 2017. The findings are presented at **Appendix 2** and **Appendix 3** for East Belfast and Castlereagh respectively and the following conclusions can be drawn based on each of the particular areas.

East Belfast

- 3.7 As set out in **Appendix 2** East Belfast at 2001 had a total provision of 13.37 hectares developed for employment use. This provision increased to 15.87 hectares in 2009, resulting in a take up of 2.5 hectares over an 8 year period; 0.31 hectares per annum.

⁴ dBMAP originally identified an area of 87.33 hectares. However this figure was subsequently amended to 58.99 as reflected in our tables

- 3.8 In August 2017, the amount of land developed for employment uses remained unchanged at 15.87 hectares which resulted in no net change over the second 8 year period (2009 – 2017). In part, this was due to the development of a zoned employment site for an alternative development; a Tesco store. Planning permission was granted in March 2009 for Tesco – Castlereagh Road on the site of the Owen O’Cork Mill.
- 3.9 All other land within the East Belfast study area remained developed as identified by the provisions of the dBMAP technical supplement. This noted 13.37 hectares of developed land built out as at 2001.
- 3.10 A review of approved and pending planning applications identified no further windfall sites outside of the Plan designations. Enquiries made through CBRE property consultants confirmed that there were no new sites which were expected to come to market within the next year which might provide capacity within this part of the study area. Section 4 of this assessment provides an analysis of the market conditions within this part of the study area which explain the low level of development.

Castlereagh

- 3.11 As set out in **Appendix 3**, the specific findings of the survey demonstrate that as of 2001 there was a total of 73.72 hectares of land developed for employment uses.
- 3.12 By 2009 the quantum of developed land had increased to 82.92 hectares. Importantly, 7.75 hectares of this area came forward through windfall sites which were not allocated within the plan provisions.
- 3.13 In August 2017, the survey identified that there had been no change in the quantum of land development for employment uses since 2009. In the intervening time, MCH 14 Lands at Dale Farm were developed for residential development.
- 3.14 Similar to the comments at paragraph 3.10, a review of approved and pending applications from 2009 to 2017 failed to identify any windfall sites and enquiries made through CBRE confirmed that no new sites had come to the market.
- 3.15 An application to the rear of the application site was made on behalf of Blakiston Houston in 2002 and was granted planning permission in March 2010 (Planning Ref Y/2002/0554/O). The planning permission was renewed in August 2016 (Planning Ref Y/2013/0064/O). The scheme comprises a range of employment uses. These proposals are within the MCH09 zoning and their provisions have been accounted for in our analysis.

Land Take Up Rates

- 3.16 Using the survey information above, we can calculate the up take rate based on the level of change in the developed area over the 16 year period from 2001 to 2017.

3.17 This is outlined as follows:

- East Belfast – 0.16 hectares per year (based on a 2.5 hectares build rate).
- Castlereagh – 0.57 hectares per year (based on a 9.2 hectares build rate).

Remaining Employment Land Supply Beyond 2017

3.18 Based on updated survey information collated in 2017 it is evident that within the study area over the last 16 years 11.70 hectares of land has been developed for employment uses. This equates to 0.73 hectares per annum which provides for a 115 year land supply. A summary of these findings is represented in **Appendix 4** and details of the Site Assessment Forms are enclosed in **Appendix 5**.

3.19 At the time of writing this assessment the lands to the rear of the application owned by Blakiston Houston had the benefit of an outline planning permission. While we fully appreciate that this permission could not be implemented without having first secured approval for reserved matters, should it be discounted from the assessment there would still be a significant supply of land within the study area to address future needs.

Vacant Accommodation

3.20 In carrying out surveys of the zoned sites (as presented in **Appendix 5**) consideration was also given to the availability of vacant employment properties on zoned industrial sites. Our survey of the East Belfast and Castlereagh areas included an assessment of estimated occupancy based on site observations and enquiries made by CBRE.

3.21 From this assessment the following conclusions were drawn:

- There are vacant properties located on zoned employment lands which are either dated properties (particularly in the East Belfast – Tamar Street and Island Street) or new build units that are yet to be occupied by a tenant.
- While a number of zonings have been fully built out there remains a level of supply as the sites are not operating at 100% capacity.
- Across East Belfast there is an average unit occupancy rate of 70% on zoned sites.
- Within the Castlereagh this rises to an average of 80% of units occupied.

3.22 This demonstrates that typically the quantum of existing units on employment sites is not fully occupied and there is further supply within the existing zonings. This level of occupancy within the study area may be attributed in part to ageing buildings, changing user profiles and demand of occupiers. Critically, it highlights that the overall land supply position is greater than the lands noted in paragraphs 3.17 and 3.18.

3.23 Against this background, the release of the application site for an alternative development is therefore not considered to be of harm to the future spatial needs of businesses in the study area.

4. Demand and Market Interest – NI & Within the Study Area

- 4.1 The second objective of this Assessment is to examine the level and nature of demand for employment sites and premises within the study area.
- 4.2 To inform this section CBRE Commercial Property Consultants have provided an opinion of the Northern Ireland market context before commenting on the specifics of the study area.

Market Overview of Employment Land in Northern Ireland

- 4.3 There is a defined hierarchy of locations within Northern Ireland for employment land / business space. Within Belfast prime locations are the Harbour Estate including Clarendon Dock, Sydenham Business Park and Boucher Road; Mallusk (Newtownabbey), and Blaris/Knockmore (Lisburn). Figure 4.1 illustrates the hierarchy which exists within Northern Ireland, from those which are highly desired to locations in low demand.

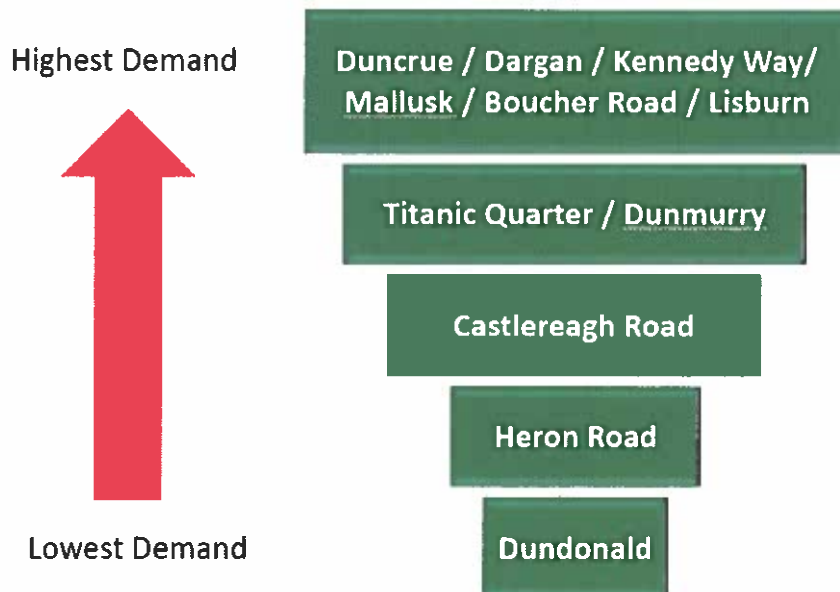


Figure 4.1: Employment Land Hierarchy of Locations

- 4.4 These locations are priority locations for most industrial and logistics businesses, primarily due to their ease of access to the motorway, harbour and airports and in the case of Lisburn its proximity to the Belfast to Dublin corridor.
- 4.5 Figure 4.2 identifies the range of criteria considered by Developers in selecting a location for a new employment/business space. As the figure demonstrates connectivity is of prime importance.



Figure 4.2: Key Criteria in Determining Location of New Employment/Logistics Development

- 4.6 There has been a concentration in demand for specific locations from logistics and distribution companies, who are seeking locations with ease of access to the main motorway network; this is leading to an increase in interest in locations such as Mallusk and Lisburn.
- 4.7 There has also been an increase in demand for space on the main Belfast to Dublin corridor, (post Brexit) making Lisburn a popular choice.
- 4.8 While there are significant zonings within Local Development Plans (LDPS) across Northern Ireland, the market continues to be hindered by a lack of good quality buildings in prime locations.
- 4.9 Over the past 8 years there have been a limited number of speculative developments as rents and capital values are not strong enough to make development viable. Average construction costs, excluding VAT, professional fees, developer's profit and site costs currently equate to £40.00 -£50.00 per sq. ft. For a feasible development, rents in the region of £6.00 - £7.00 per sq. ft. would be required. However, the current market rate is £4.00 per sq. ft; a figure which is not expected to change for a considerable period of time. Current values have remained largely static/flat over recent years.
- 4.10 A lack of quality buildings is encouraging a number of developers to consider bespoke Design and Build options which commands a premium rent. Recent Design and Build options have been marketed with rents in excess of £6.50 per sq. ft. in order to make projects viable. Such schemes include; Kilroot Business Park at Carrickfergus; Antrim Road, Newtownabbey; The Outlet at Banbridge and Knockmore Hill, Lisburn. There is however, no shortage in supply of zoned employment land for Design & Build opportunities; its financial viability of the project which is the main factor limiting development.

- 4.11 Invest NI currently holds approximately 520 acres of large industrial sites of c. 15 acres+ across Northern Ireland which are currently available for development. Invest NI offer a range of grants to help new businesses including; revenue grants towards start-up costs, interest relief and employment grants. In order to qualify for Invest NI sites a company must be an Invest NI client.
- 4.12 There are a number of significant Invest NI sites in the greater Belfast area, situated in prime locations which have yet to be developed. Examples include: a 13-acre site in Springbank Industrial Estate, Lisburn which has an asking price of £65,000 per acre and a 19.2-acre site at Balloo South Industrial Estate, Newtownards asking £90,000 per acre. These values are considered to be low in price yet there is limited uptake.

East Belfast / Castlereagh Market – The Study Area

- 4.13 Demand and uptake within East Belfast is mainly from occupiers seeking space of less than 20,000 sq. ft., with demand for smaller unit of 2,000-5,000 sq. ft.
- 4.14 Average commercial/industrial rents within East Belfast range from £2.75 - £3.50 per sq. ft. depending on age and condition. This is in sharp contrast to the rental values which office accommodation can attract at c. £10 per sq. ft.
- 4.15 There are several prime locations within the study area including: Montgomery Road, Castlereagh Road Business Park, Prince Regent Road and Dundonald. While these sites may be largely developed the quality of the stock and suitability of the buildings to meet current market needs is limited.
- 4.16 Figure 4.3 shows the extent of the former Hughes Christensen complex which closed in 2010. The complex on Montgomery Road comprises approximately 126,750 sq. ft. of industrial floorspace set on a site c. 5.4 acres. This unit has been on the market for let for a number of years with a quoting rent of £2.75 per sq. ft. We understand the developer is actively pursuing redevelopment proposals for the site.



Figure 4.3: Former Christian Hughes Anderson Complex

- 4.17 Prince Regent Road contains a number of larger industrial units of 20,000 sq. ft. +. Occupiers include AAH, Royal Mail, Charles Hurst, BOC Gas and Brow Packaging.

- 4.18 Again, whilst a popular location there are several vacant units including; 6 Prince Regent Road c. 42,800 sq. ft. warehouse with ancillary office space and Unit A, 16 Prince Regent Road – a former Honda showroom, both currently on the market To Let CBRE has recently been instructed to market a 50,000 sq. ft. warehouse on Price Regent Road To Let, adding to the existing vacant stock. When this is considered in tandem with the Montgomery Road accommodation this equates to approximately 20,600 sq. metres (220,000 sq. ft.). of vacant accommodation.
- 4.19 The Castlereagh Road also includes a number of large industrial units most of which are dated and in poor condition. If these were to become vacant it is our opinion that they would be difficult to let, due to the limited demand for larger space within this area.
- 4.20 Business space in Dundonald is concentrated around Ballyoran Lane and Carrowreagh Road and consists of:
- Ballyoran Business Park – This space was formerly occupied by the Adamsez factory. Following the closure of the factory the space has been redeveloped into a number of smaller business units. Current tenants include Gilnahirk Tyres, Rainbow Gymnastics, Wrights Accident Repair Centre, and the Village Kitchen café. At the time of preparing this statement there were approximately 4 vacant units within the development; several of the recent lettings were notably to non B class uses.
 - Dundonald Industrial Estate – is located off Ballyoran Lane. The estate consists of the application site; a former government training facility which is currently utilised as a call centre by Lloyds banking group; Towbars NI and Carroll's Glazing (which are accommodated within single storey accommodation to the rear of the application site).
 - Carrowreagh Business Park - consists of a number of small business units of approximately 2,000 sq. ft. These units originally sold well at the peak of the market, however, over recent years the park has experienced difficulties in attracting new tenants. Similar to the trend within Ballyoran Business Park while the majority of units were previously occupied by light industrial and storage and distribution uses over recent years this has changed with the introduction of several other uses including a gym; a children's indoor play area and other non B class uses.
 - Inspire Business Centre – located beside Carrowreagh Business Park, Inspire Business Centre is a Local Enterprise Agency which supports business start-up ventures by providing accommodation, business services and other related services. Accommodation within the centre takes the form of industrial units of approximately 3,000 sq ft and commercial spaces less than 500 sq ft. At the time of preparing this report there were 2 vacant units within the complex.
- 4.21 Based on our experience of the area, this location typically attracts businesses and services which are primarily serving a local need. One factor which reduces the

attractiveness of this location is the levels of congestion along the Upper Newtownards Road during peak times.

4.22 Based on our market knowledge and expertise we would draw the following conclusions.

- The study area is a low order employment/business space location. Its level of attractiveness is targeted at local businesses who operate from within East Belfast/Dundonald serving dominantly a local market.
- Over recent years there has been an emergence of non-compliant B class uses within the zoned employment locations around the application site; further evidence of the challenges facing developers in attracting 'B class business' tenants.
- The prime locations in the greater Belfast area are focused on the Harbour Estate including Clarendon Dock, Sydenham Business Park and Boucher Road; Mallusk (Newtownabbey), and Blaris/Knockmore (Lisburn). This trend is unlikely to change, and as businesses continue to strive to increase productivity and efficiencies there will be an increased focus on locations which have a high level of accessibility.
- The costs associated with developing new proposals verses the rental income which can be achieved is undermining the profitability of new developments resulting in stagnation in the market place.

5. Suitability of the Site for Business Space

- 5.1 The third objective of this assessment is to demonstrate why the site is no longer suitable for business space/ employment land.

Accessibility

- 5.2 The site occupies a prominent location fronting onto the Upper Newtownards Road however the location ranks poorly in the hierarchy of occupier preferred business space/employment land locations in Greater Belfast (as discussed in paragraph 4.3). The site is also in a part of Belfast which during peak times can experience congestion and with limited alternative options/routes into Belfast can led to drivers experiencing significant delays.

Global Market Changes and Demand

- 5.3 The site has a history of being associated with manufacturing. The structure of the Northern Ireland manufacturing sector is changing in the face of intense global competition. This has impacted most greatly on sectors such as textiles and clothing, which face the most direct competition from low cost production countries in the developing world such as Eastern Europe, India and China. Reductions in tariff barriers and transport costs, easier communications and increased capital flows have allowed low wage countries to compete more effectively, globally, shifting production of a number of commodities away from the advanced industrialised countries⁵.
- 5.4 While the draft Industrial Strategy published in January 2017 by the Department for the Economy recognises the need to support and grow the manufacturing sector it acknowledges the challenges existing businesses are facing.
- 5.5 Where there is a manufacturing base, companies require good specification premises, immediate availability of labour and excellent access to the main arterial routes, motorways, airports and railways.
- 5.6 Many of the advanced western economies are facing the same problem as Northern Ireland in managing the change from declining manufacturing industries to a new technology –based, knowledge intensive manufacturing sector⁶. This change is also reflected in modern property requirements for high specification buildings in accessible locations.
- 5.7 Within Belfast, business space requirements in recent years have primarily been focussed on the main industrial estates and Invest NI owned estates in Greater Belfast which meet logistical requirements. Consequently, many original dated factory buildings in secondary locations have been earmarked for redevelopment or change of use since no demand exists and alternative land uses attract higher land values. Evidence also indicates that manufacturing occupiers prefer to build their own tailor made factories in suitable locations e.g. Ulster Carpets, Portadown who are pursuing proposals to redevelop their accommodation with bespoke, modern accommodation. Specific requirements sought by occupiers of modern high specification buildings include eaves

⁵ DETI, The Future of Manufacturing in Northern Ireland 2005

⁶ As above

height, floor loading capacity, services, insulation; roller shutters/dock levellers and yard area.

5.8 Based on our market knowledge and expertise we would draw the following conclusions.

- The application site is considered slightly remote from the main motorway network and local traffic conditions do not make the site immediately accessible for business space operators.
- There are no manufacturing based companies which would seek to develop the site; given its location and wider context of the manufacturing market within Northern Ireland.
- It is accepted that that older, more traditional locations can be redeveloped to cater for the needs of the knowledge based economy, however this will only occur in locations which are highly accessible; the application site is not.
- Knowledge based businesses tend to locate in locations where there are similar business operations which collectively creates a clustering effect. The close proximity of similar businesses is again an important consideration. The application site does not share these qualities and recent lettings within the Carrowreagh Business Park point to a difficulty in attracting small businesses to locate at the location (refer to paragraph 4.20).
- The continued identification of the site as a zoned employment location will only serve to blight the redevelopment potential/prospects for these lands for alternative proposals.

6. Assessment Against Policy

- 6.1 This proposal does not comply with the policy test set out in PPS4. This Section demonstrates how the proposal does accord with the strategic guidance set out in the RDS, the policy objectives of PPS4 and the relevant policy tests within the SPPS. A full consideration of the overall planning assessment is set out in the Planning Statement.

Regional Development Strategy (RDS) 2035

- 6.2 RG1 of the RDS seeks to ensure that there is an adequate supply of land to facilitate sustainable economic growth. The regional guidance is supported by a set of objectives which in summary focus on:

- **Continuity of Supply:** ensuring that there are sufficient zoned lands to deliver an effective level of supply. Our assessment of zoned sites has demonstrated that based on a take up rate calculated on development levels over the last 16 years approximately 11.70 hectares of land has been developed for employment uses. This equates to 0.73 hectares per annum which provides for a 115 year land supply within the study area. A summary of these findings is represented in Appendix 4.
- **Protecting zoned employment sites** in order to provide for a variety of suitable sites across NI (underlining is our emphasis). The market opinion provided by CBRE within Sections 4 and 5 highlights that the application site does not meet the needs of business space operators and the market. Within the hierarchy of business space, the site is a low order location and within the immediate area around the application site whilst there are lands currently being utilised for business uses, this is mainly serving a local market. Consequently, the application site is not considered to be a suitable location in the context of current and future economic needs.

- 6.3 Notwithstanding the market opinion provided by CBRE, it is important to note that SFG1 identifies key locations for economic growth which should be protected and strengthen. These locations include Belfast Harbour Area, including Titanic Quarter; West Lisburn/Blaris; Purdysburn; Global Point/Ballyhenry. Notably, the application site locality is not mentioned.

Planning Policy Statement 4: Planning and Economic Development

- 6.4 In view of the LDP context, in assessing the proposal against the policy tests set out in PPS4, the higher, more onerous policy test has been applied.
- 6.5 It is recognised that policy PED 7 of Planning Policy Statement 4 sets out a clear policy position that *'development that would result in the loss of land or buildings zoned for economic development use in a development plan (either existing or new allocations) to other uses will not be permitted, unless the zoned land has been substantially developed for alternative uses'*. The policy goes on to note that retailing or commercial leisure development will not be permitted except where justified as an acceptable.
- 6.6 In this case, it is recognised that policy PED7 cannot be complied with; however when considered in a rounded assessment against the overall policy objectives of Planning

Policy Statement 4 the proposal does not cause any inconsistencies, but rather satisfies the overall policy objectives.

6.7 The policy objectives of the Statement, relevant to this proposal are:

- To promote sustainable development in an environmentally sensitive manner;
- To tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality, size and location; and
- To promote mixed use development and improve integration between transport, economic development and other land uses, including housing.

6.8 The application site is a brownfield development opportunity site, situated within an area which is experiencing change. The area was previously dominated by commercial uses primarily manufacturing uses located on the fringe of Belfast. The context of the area around the application site is now defined by a mix of uses including residential, leisure, business space and education. The site is free from any sensitive environmental designations and is located within close proximity to public transport with bus stops serving Newtownards and Belfast within 5 minutes walk. Within the immediate area, the Dundonald Park & Ride which will be serviced by the new Belfast Rapid Transit service is within 10 -15 minutes walk of the site. The redevelopment of the site for an alternative use which is in keeping with the context and character of the immediate area and is within close proximity to public transport facilities is wholly in keeping with the first and third policy objectives.

6.9 The results from the employment land assessment demonstrate that there is generous supply of land within the study area to meet future needs. Based on current take up rates which have remained fairly constant, there is a 115 year land supply. Indeed, there are also vacant units and buildings within the zoned employment sites which will provide for future demand, providing for choice and variety as outlined in Section 3. Granting planning permission for the proposed development does not impinge on the second policy objective.

SPPS

6.10 Similar to the approach adopted with PPS4, the proposed development has been assessed against the SPPS policies on the basis of the more onerous test; that the site is a zoned employment location.

6.11 It is evident that the SPPS seeks to protect economic development sites and buildings which are well located and suited for such purposes. The application site fails to address either of these aspects as outlined in Sections 3 and 4 of this report. The site is neither well located nor suited for employment uses when consideration is given to the wider market context as confirmed by the market opinion provided by CBRE and noted above at paragraph 6.2.

6.12 Particular attention is drawn to the use of the word '*normally*' within paragraph 6.89. It implies that a degree of discretion can be exercised in determining planning applications for alternative development proposals against the general presumption of retention. In

considering the degree of flexibility which should be applied in the determination of this development proposal it is worth considering that:

- The proposal seeks to redevelop a brownfield development opportunity site, which whilst zoned for employment uses is not located in an area which is preferable to market demands and operator needs.
- The site has been inactive for over 12 years and despite an attempt by Sainsbury's Supermarket Limited (SSL) and Lagmar in 2013 to redevelop the lands for a retail and employment based proposal the outline planning permission was not implemented as a result of significant changes in the market context.
- Since the manufacturing use ceased, the former industrial buildings have been demolished in an attempt to improve the visual quality of the site which is somewhat of an eye sore.

6.13 The latter part of paragraph 6.89 also references that Councils *may wish to retain flexibility to consider alternative proposals that offer community, environmental or other benefits that are considered to outweigh the loss of land for economic development use*. Further information on how the proposal addresses wider community aspirations and the benefits arising from the granting of planning permission are discussed within the Pre Application Community Consultation Report and the Economic Impact Assessment (respectively).

6.14 The proposed development complies with the policy provisions set out in the SPPS at paragraph 6.89. Against the normal position of retaining zoned employment lands and buildings there are sufficient grounds to support the approval of an alternative development proposal.

6.15 Drawing on the analysis of planning policy pertaining to economic development proposals, it is concluded that the proposed development does not give rise to any harm to the relevant policies within the RDS. The proposal is not compliant with PED7 of PPS4 but supports and complies with the relevant policy objectives of PPS4. It also addresses the policy provisions set out in the SPPS at paragraph 6.89. There is a subtle difference in the policy position set out in the SPPS from that of PED7. Based on the direction outlined in the SPPS, this difference must be resolved in favour of the policy provisions in the SPPS.

7. Summary and Conclusions

7.1 The key points arising from this assessment can be summarised as:

- There is an adequate supply of zoned employment land within the study area to meet future needs based on current take up rates⁷ of 0.73 hectares per annum; this provides for a 115 years land supply.
- Within zoned sites which are built out there are vacant properties, a combination of dated properties (particularly in the East Belfast – Tamar Street and Island Street) or new build units that are yet to be occupied by a tenant. In the case of dated/older building stock evidence from the Turley site surveys and CBRE suggests that bespoke operator redevelopment proposals are being pursued. Further evidence of supply within existing zoned sites.
- The prime locations in the greater Belfast area are focused on the Harbour Estate including Clarendon Dock, Sydenham Business Park and Boucher Road; Mallusk (Newtownabbey), and Blaris/Knockmore (Lisburn). A number of these locations are identified within the RDS 2035; notably the locality of the application is not (refer to paragraph 2.5). This trend is unlikely to change, and as businesses continue to strive to increase productivity and efficiencies there will be an increased focus on locations which have a high level of accessibility.
- The study area is a low order employment/business space location. Its level of attractiveness is targeted at local businesses who operate from within East Belfast/Dundonald serving dominantly a local market.
- There are no manufacturing based companies which would seek to develop the site; given its location and wider context of the manufacturing market within Northern Ireland.
- The continued identification of the site as a zoned employment location will only serve to blight the redevelopment potential/prospects for these lands for alternative proposals.

7.2 These findings demonstrate that granting planning permission for an alternative development proposal will not prejudice the supply of zoned land within the study area; a key policy consideration for PPS4 and the SPPS.

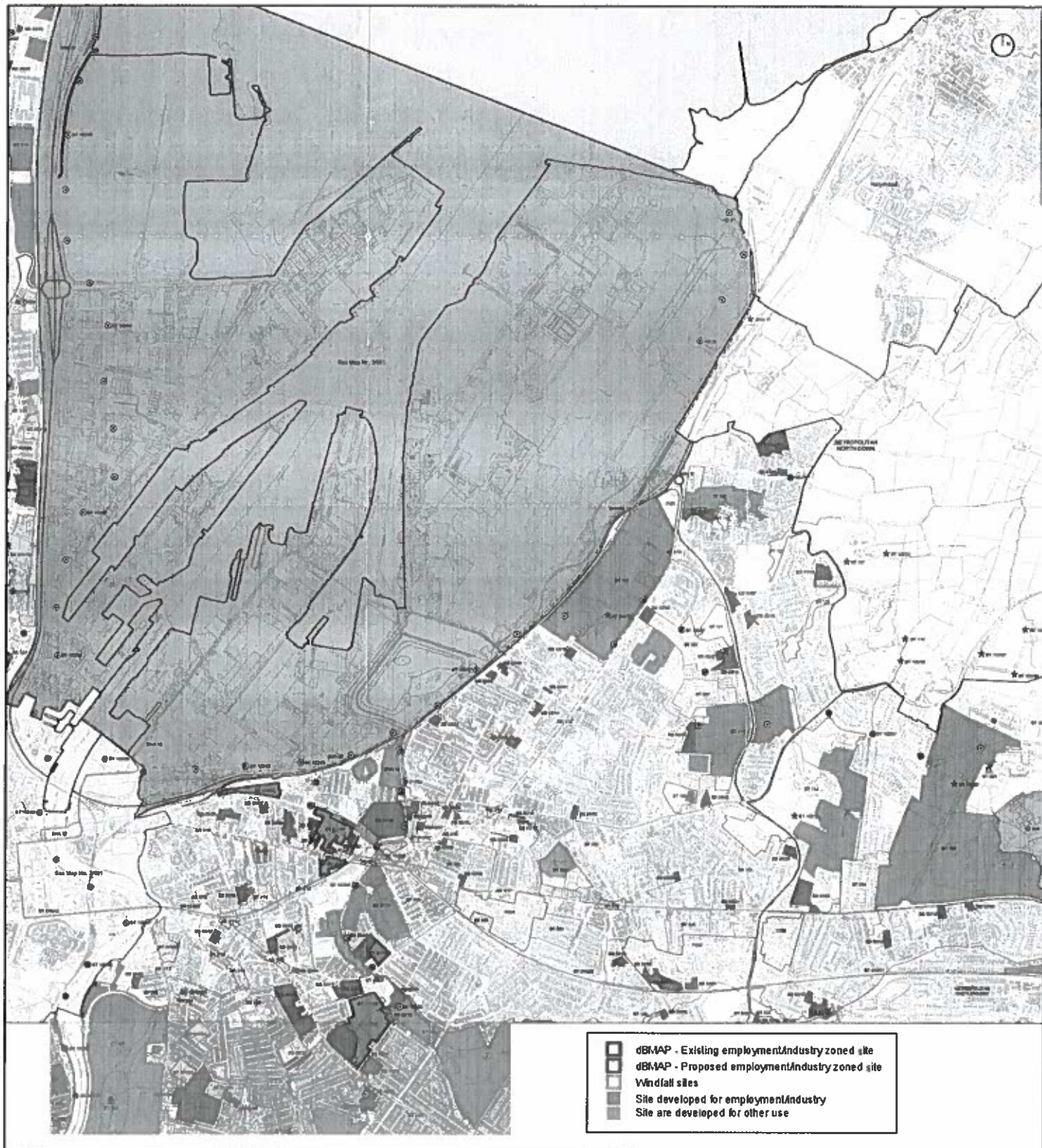
7.3 The market opinion provided by CBRE confirms that the site is not well located or suited for business space from a market perspective; the passage of time is not going to change these characteristics. Rather market demand and interest will continue to focus on the prime business locations within the greater Belfast Area placing greater stress on older employment locations.

7.4 The SPPS does recognise that while lands and buildings zoned for employment uses should be retained and protected that there may be circumstances in which this position

⁷ Take up figure based on data for the last 16 years

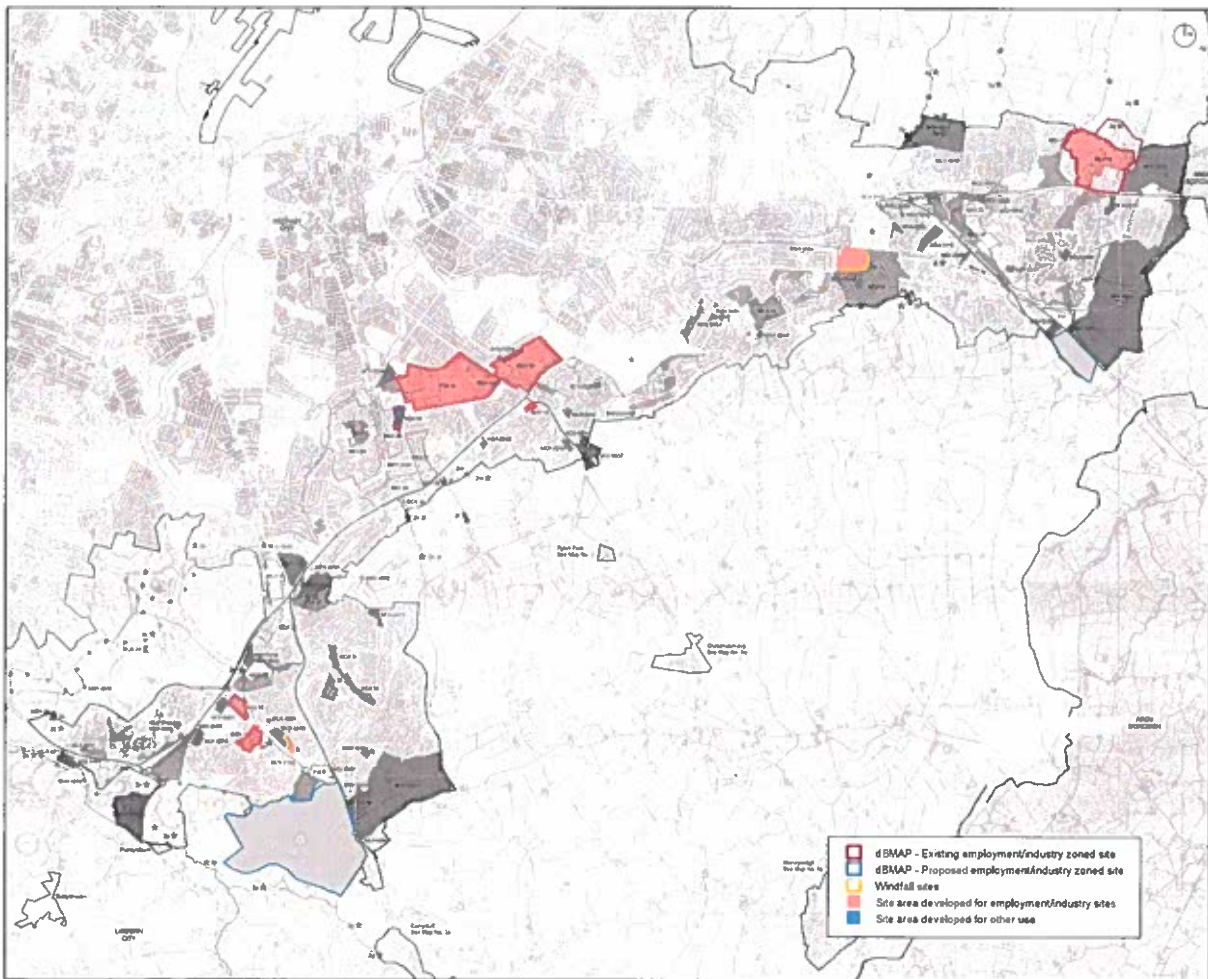
should be reconsidered. This proposal is an example of an instance in which Council should exercise their discretion.

- 7.5 This proposal does not give rise to any harm to the RDS 2035 principles or the relevant policy objectives of PPS4, and is wholly compliant with paragraph 6.89 of the SPPS. The proposed development seeks to regenerate a brownfield site with a viable use which is appropriate within the context of the surrounding. In doing so it can deliver economic, environmental, and social benefits which significantly contribute to outweighing the loss of a zoned employment site.



EAST BELFAST AREA - EMPLOYMENT SITES PLAN
 Assessment of Employment Land Supply, October 2017
 Ref: LAGB3004/7

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CASTLEREAGH DISTRICT COUNCIL AREA - EMPLOYMENT SITES PLAN
 Assessment of Employment Land Supply, October 2017
 Ref LAGB30046

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Turley

Appendix 2: East Belfast Employment Land Summary

Belfast Sites						
Employment Land Status at 2001						
Sites	Proposed Site ¹	Existing Site ²	Plan Ref ³	Site Area ⁴	Actual Area Developed ⁵	Supply ⁶
Newtownards Road/Tamar Street		X	BT011/01	3.12	3.12	0.00
Beersbridge Road		X	BT011/02	1.14	1.14	0.00
Island Street/Ballymacarrett Road		X	BT011/03	1.34	1.34	0.00
East Belfast Enterprise Park		X	BT011/04	0.83	0.83	0.00
Castlereagh Road		X	BT011/05	6.94	6.94	0.00
Owen O'Cork Mill, Castlereagh	X		BT008	2.40	0.00	0.00
TOTAL				15.77	13.37	0.00
Employment Land Status at 2009						
Sites	Proposed Site	Existing Site	Plan Ref	Site Area	Actual Area Developed	Supply
Newtownards Road/Tamar Street		X	BT011/01	3.12	3.12	0.00
Beersbridge Road		X	BT011/02	1.14	1.14	0.00
Island Street/Ballymacarrett Road		X	BT011/03	1.34	1.34	0.00
East Belfast Enterprise Park		X	BT011/04	0.83	0.83	0.00
Castlereagh Road		X	BT011/05	6.94	6.94	0.00
Owen O'Cork Mill, Castlereagh ⁷	X		BT008	2.40	0.00	0.00
Bloomfield Commercial Centre	Unzoned Windfall			2.50	2.50	0.00
TOTAL				18.27	15.87	0.00
Employment Land Status at 2017						
Sites	Proposed Site	Existing Site	Plan Ref	Site Area	Actual Area Developed	Supply
Newtownards Road/Tamar Street		X	BT011/01	3.12	3.12	0.00
Beersbridge Road		X	BT011/02	1.14	1.14	0.00
Island Street/Ballymacarrett Road		X	BT011/03	1.34	1.34	0.00
East Belfast Enterprise Park		X	BT011/04	0.83	0.83	0.00
Castlereagh Road		X	BT011/05	6.94	6.94	0.00
Bloomfield Commercial Centre	Unzoned Windfall			2.50	2.50	0.00
TOTAL				15.87	15.87	0.00
2001-2017 Development Rate:				2.50		
Annual Development Rate:				0.16		
Residual Supply (Years):				0		
Notes						
While the Belfast Urban Area Plan 2001 is the extant local development plan, no sites were zoned in the Plan for employment use in East Belfast. Employment Assessment examined sites identified in dBMAP.						
1. Proposed Site refers to status as undeveloped/vacant site identified in dBMAP						
2. Existing Site refers to status as an existing employment site in dBMAP						
3. Reference as per dBMAP						
4. Site Area expressed In Hectares and sourced from dBMAP						
5. Estimate as to the area developed for employment uses						
6. Quantum of remaining land within zoning/site						
7. Removed from assessment following the grant of planning permission in March 2009 for a Tesco foodstore						

Appendix 3: Castlereagh Employment Land Summary

Castlereagh Sites

Employment Land Status at 2001

Sites	Proposed Site ¹	Existing Site ²	Plan Ref ³	Site Area ⁴	Actual Area Developed ⁵	Supply ⁶
Dundonald Enterprise Park/Carrowreagh		X	MCH09	34.98	19.25	15.54
Newtownbreda Factory Estate		X	MCH10	2.79	2.09	0.70
Carborhill Industrial Estate		X	MCH11	2.07	0.00	2.07
Prince Regent Park		X	MCH12	18.25	18.25	0.00
Castlereagh Industrial Estate		X	MCH13	32.71	32.71	0.00
Dale Farm, Montgomery Road		X	MCH14	1.42	1.42	0.00
Ballygowan Road		X	MCH15	0.50	0.00	0.50
Purdysburn/Knockbracken	X		MCH07	58.99	0.00	58.99
Comber Road, Millmount	X		MCH08	9.25	0.00	9.25
TOTAL				160.96	73.72	87.05

Employment Land Status at 2009

Sites	Proposed Site	Existing Site	Plan Ref	Site Area	Actual Area Developed	Supply
Dundonald Enterprise Park/Carrowreagh		X	MCH09	34.98	18.85	15.54
Newtownbreda Factory Estate		X	MCH10	2.79	2.79	0.00
Carborhill Industrial Estate		X	MCH11	2.07	2.07	0.00
Prince Regent Park		X	MCH12	18.25	18.25	0.00
Castlereagh Industrial Estate		X	MCH13	32.71	32.71	0.00
Dale Farm, Montgomery Road		X	MCH14	1.42	0.00	0.00
Ballygowan Road		X	MCH15	0.50	0.50	0.00
Purdysburn/Knockbracken	X		MCH07	58.99	0.00	58.99
Comber Road, Millmount	X		MCH08	9.25	0.00	9.25
Beechhill Park	Unzoned Windfall			1.75	1.75	0.00
Hanwood Business Park	Unzoned Windfall			6.00	6.00	0.00
TOTAL				168.71	82.92	83.78

Employment Land Status at 2017

Sites	Proposed Site	Existing Site	Plan Ref	Site Area	Actual Area Developed	Supply ⁷
Dundonald Enterprise Park/Carrowreagh		X	MCH09	34.93	18.85	15.54
Newtownbreda Factory Estate		X	MCH10	2.79	2.79	0.00
Carborhill Industrial Estate		X	MCH11	2.07	2.07	0.00
Prince Regent Park		X	MCH12	18.25	18.25	0.00
Castlereagh Industrial Estate		X	MCH13	32.71	32.71	0.00
Dale Farm, Montgomery Road		X	MCH14	1.42	0.00	0.00
Ballygowan Road		X	MCH15	0.50	0.50	0.00
Purdysburn/Knockbracken	X		MCH07	58.99	0.00	58.99
Comber Road, Millmount	X		MCH08	9.25	0.00	9.25
Beechhill Park	Unzoned Windfall			1.75	1.75	0.00
Hanwood Business Park	Unzoned Windfall			6.00	6.00	0.00
TOTAL				168.66	82.92	83.78

Supply Analysis

2001-2017 Development Rate:	9.20
Annual Development Rate:	0.57
Residual Supply (Years):	145.70

Notes

While the Belfast Urban Area Plan 2001 is the extant local development plan, the Plan identified 1 area within the former Council area of Castlereagh for employment uses - MCH 09. Employment Assessment has examined sites identified in the BUAP and dBMAP.

- Proposed Site refers to status as undeveloped/vacant site identified in dBMAP
- Existing Site refers to status as an existing employment site in dBMAP
- Reference as per dBMAP
- Site Area expressed in Hectares and sourced from dBMAP
- Estimate as to the area developed for employment uses
- Quantum of remaining land within zoning/site
- Extent of remaining lands within MCH09 pertains to Blakiston Houston Estate which has the benefit of an extant outline planning permission

Appendix 4: Combined Summary of Study Area

Appendix 4: Summary Table	
Combined figures for East Belfast and Castlereagh	
2001-2017 Development Rate:	11.70
Annual Development Rate:	0.73
Residual Supply (Years):	114.83

Appendix 5: Site Assessment Forms

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Employment Land Assessment

East Belfast - Newtownards Road/Tamar Street

Site Location	Site is located between the Newtownards Roads and Tamar Street in East Belfast. It is identified on dBMAP Plan Ref: 4/004 – Belfast City
Size	3.12 Ha
Existing Uses	<p>The site comprises a mixture of single industrial holdings and a Mill development of four storeys which is occupied by a range of businesses.</p> <p>The site and individual unit holdings are abutted by an area of open space to the north. The public roadways of Carew Street and Tamar Street also bisect the site.</p>
Neighbouring Uses	Site is bound to the north by an area of open space and the Connswater Community Greenway. Surrounding uses are a mixture of residential and commercial. Residential terraced housing is located to the east and west of the site with commercial properties along the south fronting onto the Newtownards Road.
Strategic Access	<p>Site is located on the Newtownards Road, identified within dBMAP as an arterial route (BMAP Ref: AR 1/7)</p> <ul style="list-style-type: none"> • Limited connections to transport interchanges and no immediate rail connections • Not located on a Key Transport Corridor • Site has limited strategic accessibility and serves as a secondary transport location
Market Condition and Perception	<p>Low order secondary location Following a site visit at this zoning, it was established that the site remains relatively active in terms of its operational occupation. A large warehouse to the north-west of the site was seen to be the most intensive operating at full capacity with business in line with light industry such as haulage, construction training services and vehicle mechanics.</p> <p>There did appear to be several vacant units located within the zoning, the most notable a former linen mill (Browns) that sits central within the zoning. However more recently the larger building as part of this former mill is now semi-occupied with light industrial uses as well as retail and storage.</p>

	Approximately 60% of this zoned employment site is currently operational, with many units semi-occupied or being used for storage purposes only.
Development Plan Allocation	Unzoned land within the extant plan – the Belfast Urban Area Plan 2001 dBMAP identifies the site as existing employment/industry (BT011/01)
Current development proposals and/or planning permission	No recent planning permissions or development proposals
Land ownership	Unknown
Physical/ Development Constraints	The site is bordered on the majority of boundaries by residential properties and potential amenity impacts would be important considerations. The 4 storey Mill building has subdivisions within floors and whilst this can cater for a range of end user sizes, the format presents difficulties providing a comprehensive offer to modern industrial floor plate requirements.
Conclusion	Considering the piecemeal nature of the site, mix and range of units, distance from key transport and access nodes, the site is considered a secondary tier industrial/employment land location.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

East Belfast – Beersbridge Road

Site Location	Site is located on the Beersbridge Road, between Bloomfield Drive and Bloomfield Park in East Belfast. It is identified on dBMAP Plan Ref: 4/004 – Belfast City
Size	1.14 Ha
Existing Uses	The site comprises a mixture of single industrial holdings and two Mill structures which range from two to four storeys. Current occupiers include a range of businesses such as trade counters, stores and offices.
Neighbouring Uses	Site is bound to the north east and north west by residential properties and fronts onto the Beersbridge Road to the south east. The residential development Elmgrove Mews abuts the site to the south west. The area is predominantly residential with a petrol filling station directly opposite the site.
Strategic Access	Site is located on the Beersbridge road which is not a key transport corridor and has limited strategic accessibility. The location serves as a secondary transport location.
Market Condition and Perception	<p>Former Mill complex which has been carved up and now has multiple operators.</p> <p>A large 2 story unit with frontage on to the Beersbridge road with approx. 720m² of floor space currently lies vacant as well as number of small internal units to the adjacent old factory mill.</p> <p>Additionally a smaller unit that also hosts frontage onto the Beersbridge road situated at the south-west corner currently lies vacant however, two adjacent units that share the same frontage remain operational.</p> <p>The majority of vacant space/units sit to the eastern edges of the zoning including a former warehouse with a large floorspace measuring approx. 40 m x 16m.</p> <p>In general the majority of the site remains operational with about 70% of the units either in full or part use. While still in use, the condition of the buildings appear dilapidated and are likely to be used for storage purposes only.</p>
Development Plan Allocation	The BUAP does not identify the site for any particular use.

	dBMAP identifies the site as existing employment/industry (BT011/02)
Current development proposals and/or planning permission	A planning application (LA04/2017/1012/F) for residential development is currently pending on part of the site. There are a number of actions still to close out the consultation process before the application can be determined.
Land ownership	n/a – site is partially constructed housing development
Physical/ Development Constraints	The site is a constructed housing development which would prevent the site coming forward for industrial development.
Conclusion	The site is a constructed housing development which would prevent the site coming forward for industrial development.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

East Belfast – Island Street/Ballymacarrett Road

Site Location	Site is located on Island Street, between the railway line and roadway in East Belfast. It is identified on dBMAP Plan Ref: 4/003 – Belfast City
Size	1.34 Ha
Existing Uses	The site comprises three units located within a triangular plot of land. Current occupiers include a decorating centre, office/warehouse and factory/warehouse.
Neighbouring Uses	Site is bound to the north by the railway line, and the south by the Island Road. The residential properties and children's playground of Medway Street provide the eastern boundary and the site tapers to meet the Bridge End flyover to the west.
Strategic Access	<p>Site is located on the Island Road with strong connections to the strategic road network with access to the Sydenham By-Pass and Bridge End flyover. In close proximity to onward access to Belfast Harbour and Port and Key Transportation Corridor (M1/M2/M3).</p> <p>The site abuts the railway line, however located directly on the main Belfast/Bangor line with no haulage stop provided at the site. This resource could prove difficult to tap into.</p> <p>Site has strong strategic accessibility, close to existing port/highway and potential rail uses – serving as a prime location</p>
Market Condition and Perception	<p>Small infill site undeveloped/ it would suit a workshop or business units. While the majority of the site currently operates as a storage and distribution operation, there are a number of vacant units to the eastern edge of the site. These are located along the eastern elevation of the large warehouse and exist as one and three storey units.</p> <p>These units take up approximately 20% of the overall developed site and exist relatively stable in terms of their structural soundness.</p>

Development Plan Allocation	The BUAP does not identify the site for any particular use. dBMAP identifies the site as existing employment/industry (BT011/03)
Current development proposals and/or planning permission	No recent planning permissions or development proposals
Land ownership	The site has mixed ownership with acquisition of third party lands required in order to bring forward the site for a large single end user.
Physical/ Development Constraints	The site is bordered on the majority of boundaries by road/rail infrastructure. Constrained, narrow site shape may prove difficult to accommodate modern floor plate requirements.
Conclusion	The site has good transport connections and accessibility, however the constrained shape and narrow depth could prove difficult to appear to a large floor plate requirement. More suited to smaller unit sizes.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

East Belfast – East Belfast Enterprise Park

Site Location	Site is located on the Albert Bridge Road, between the Stonyford Street and Newtownards Road in East Belfast. It is identified on dBMAP Plan Ref: 4/004 – Belfast City
Size	0.83 Ha
Existing Uses	The site comprises a number of small light industrial units within an enterprise park facility. Current occupiers include a decorating/tile centre, car repair workshops, office/warehouse.
Neighbouring Uses	Site is bound to the north by commercial properties of the Newtownards Road and the south by a small number of residential and commercial properties. Residential uses are located to the west and Connswater Shopping Centre is opposite the site.
Strategic Access	<p>Site is located on the Albert Bridge Road, identified within BMAP as an arterial route (BMAP Ref: AR 1/6).</p> <ul style="list-style-type: none"> • Limited connections to transport interchanges and no immediate rail connections • Not located on a Key Transport Corridor • Site has limited strategic accessibility and serves as a secondary transport location
Market Condition and Perception	<p>Reasonably modern complex of small business units with high occupancy levels. Moderate demand.</p> <p>The units contained within the zoning are relatively active in terms of their take up. Small business and light industry make up the majority of the units with some existing as sui-generis hot-food availability. No vacant units were identified.</p>
Development Plan Allocation	The BUAP does not identify the site for any particular use. dBMAP identifies the site as existing employment/industry (BT011/04)
Current development proposals and/or planning permission	No recent planning permissions or development proposals
Land ownership	Due to the limited size of the park, the site may have single ownership, however this is unknown and units may be let on a tenant basis.

Physical/ Development Constraints	The site is bordered by a mixture of residential and commercial properties and has an irregular shape which constrains development and future use for optimum floor plate requirements.
Conclusion	Considering the constrained nature of the site, small range of units, distance from key transport and access nodes, this site is considered a secondary tier industrial/employment land location.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

East Belfast – Castlereagh Road

Site Location	Site is located on the Castlereagh Road/Orby Road, between the Grove Street East and Channing Street in East Belfast. It is identified on dBMAP Plan Ref: 4/004 – Belfast City
Size	6.94 Ha
Existing Uses	The site comprises a number of medium to large industrial/warehouse units. Current occupiers include a builders merchant, bakery factory, car sales and office/warehouse facilities. Also a large area of vacant land to the north of the site which previously accommodated buildings.
Neighbouring Uses	Site is bound to the north by Elmgrove Primary School and surrounded to the south east and north west by residential properties. A small portion of the site meets the Castlereagh Rd and vacant land also abuts the site to the south west at the Newtownards Road.
Strategic Access	<p>Site is located on the Castlereagh Road, identified within BMAP as an arterial route (BMAP Ref: AR 1/15).</p> <ul style="list-style-type: none"> • Limited connections to transport interchanges and no immediate rail connections • Not located on a Key Transport Corridor • Site has limited strategic accessibility and serves as a secondary transport location
Market Condition and Perception	Following a site visit, the complex was operating at a high capacity with uses similar to that of light industry and production and storage uses including haulage. Little evidence could be seen to indicate that there was any vacancy within the site however some units did exist in relatively poor structural condition and did not appear to be operating during core business hours, therefore it would be fair to assume that small levels of vacancy are prevalent within this area.
Development Plan Allocation	Unzoned land within the BUAP, whilst dBMAP identifies the site as existing employment/industry (BT011/05).
Current development proposals and/or planning permission	Planning permission (Z/2013/1476/F) has been granted for social housing towards the northwestern corner of the site at the junction of Fashooda Street and Grove Street East. Planning permission was granted on 01 September 2014 and the permission remains live and can be implemented

	<p>at any time until its expiration on 31 August 2019.</p> <p>Planning permission (LA04/2016/2156/F) has also been granted for temporary school accommodation on part of the north west corner of the site, granted on 14/11/17.</p>
Land ownership	Unknown
Physical/ Development Constraints	<p>The site is bordered by a mixture of residential and commercial properties and has an irregular shape which constrains development and future use for optimum floor plate requirements. Access to the existing properties are taken from both Canning Street and Orby Link with no through access across the site. The River Loop flows through the centre of the site which may require potential flood risks to be addressed.</p>
Conclusion	<p>Considering the piecemeal make up of the site, access constraints, distance from key transport and access nodes, the site is considered a secondary tier industrial/employment land location.</p>

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

East Belfast – Owen O’Cork Mill, Castlereagh

Site Location	Site is located on the Castlereagh Road, between Orby Link and Channing Street in East Belfast. It is identified on dBMAP Plan Ref: 4/004 – Belfast City
Size	2.4 Ha
Existing Uses	The site is currently developed as a foodstore and is operated by Tesco.
Neighbouring Uses	Site is bound to the north and east by an existing employment/industry site and to the north west by residential properties. The site is bound to the south by the Castlereagh Road. The main land use in the vicinity is residential with a number of commercial units fronting onto the Castlereagh Road. The River Loop flows along the south east boundary.
Strategic Access	n/a – site is developed as a foodstore
Market Condition and Perception	n/a – site is developed as a foodstore
Development Plan Allocation	The BUAP does not identify the site for any particular use. Within dBMAP the site was identified as an employment/industry (BT008) location but was later developed as a Tesco food store.
Current development proposals and/or planning permission	n/a – site is developed for alternative use
Land ownership	Tesco Store Ltd.
Physical/ Development Constraints	-
Conclusion	-

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Purdysburn/Knockbracken

Site Location	Site is located on land at Saintfield Road, Purdysburn including Knockbracken Healthcare Park. It is identified on dBMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	87.33 Ha (of which 59 hectares is identified for a Business Park)
Existing Uses	The site currently accommodates Knockbracken Healthcare Park with a number of clustered buildings and associated open space in the form of playing pitches and gardens.
Neighbouring Uses	Agricultural land provides the southern and western boundaries, with the north and east comprising residential uses.
Strategic Access	<p>Site is located on the Saintfield Road which is a protected route. The site has a number of secondary access points taken from surrounding minor roads such as the Old Saintfield Roads and Purdysburn Road.</p> <ul style="list-style-type: none"> • The site abuts the proposed Rapid Transit Scheme route. • Limited connections to transport interchanges and no immediate rail connections • Not located on a Key Transport Corridor • Site has limited strategic accessibility and serves as a secondary transport location
Market Condition and Perception	Site is subject to a long term development plan, but no indication when this might occur. Would suit a small business park. Demand is low for this form of use.
Development Plan Allocation	<p>The BUAP does not identify the site for any particular use.</p> <p>The dBMAP identifies the site as a Major Employment Location (MCH 07)</p> <p>BMAP identifies a number of Key Site Requirements outlining that the following uses should be included on the site:</p> <ul style="list-style-type: none"> • Industrial and Business Use (Use Classes B1 (a), (b) & (c)) • Provision of residential accommodation and care to people in need of care (Use Classes C3 (a), (b) & (c)) • Provision of any medical or health services (Use Class D1(a))

	<p>The Plan also states that the total amount of floorspace for Industrial and Business, Use Class B1(a) shall not exceed 3,000 square metres.</p>
<p>Current development proposals and/or planning permission</p>	<p>Site is currently occupied for Healthcare uses. No recent planning permissions or development proposals</p>
<p>Land ownership</p>	<p>Land in private ownership of DHSSPS/Health Estates</p>
<p>Physical/ Development Constraints</p>	<p>The site topography undulates throughout – this will require careful consideration in respect of building siting and the ability of the site to accommodate appropriate floorplate requirements akin to industrial development.</p> <p>Access and other infrastructural requirements are constrained and will require improvement to satisfy appropriate alternative end uses.</p> <p>Land ownership and the availability of the site will also play a key role in its delivery.</p>
<p>Conclusion</p>	<p>Given that a proportion of this site must be used for healthcare facilities, restrictions to the amount of industrial / business floorspace and the scale of the infrastructure works required to facilitate development, it is considered that this site will feed into the long-term supply requirements of the area. Some 59 hectares would be the maximum contribution to supply, but initial releases are likely to be much smaller than this.</p>

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Comber Road, Millmount

Site Location	Site is located on land at Comber Road, south-east of Millmount Road. It is identified on dBMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	9.25 Ha
Existing Uses	Agricultural lands surround the site to the south, east and west. A residential development abuts the site to the north west boundary.
Neighbouring Uses	Agricultural land provides the southern and western boundaries, with the north and east comprising residential uses.
Strategic Access	<p>Site is located on the Comber Road which is a protected route.</p> <ul style="list-style-type: none"> • Limited connections to transport interchanges and no immediate rail connections • Not located on a Key Transport Corridor • Site has limited strategic accessibility and serves as a secondary transport location
Market Condition and Perception	Secondary location.
Development Plan Allocation	<p>The BUAP does not identify the site for any particular use.</p> <p>The dBMAP identifies the site as a proposed Employment/Industry zoning (MCH 08)</p> <p>dBMAP identifies within its Key Site Requirements for the site that light industrial uses should be accommodated.</p>
Current development proposals and/or planning permission	<p>A planning application (LA04/2016/0002/O) for housing development was withdrawn having been recommended for refusal on the grounds that the proposal is contrary to BMAP, SPPS and Policy PED7 of PPS 4, in that the development, if permitted, would result in the loss of land zoned for employment.</p> <p>An earlier planning application (Y/2010/0081/O) was deemed refused on the grounds that further environmental information was not submitted by the applicant within the allotted timeframe. The application was for:</p> <ul style="list-style-type: none"> • Proposed 'Key Local Employment Site' comprising light industry, storage / distribution, call centre and research / development uses,

	<p>formation of two new access points from Comber Rd, realignment / upgrading of part of Comber Road including new access arrangements for 321, 327 Comber Road and Peartree Hill, parking and servicing areas, landscaping and other ancillary works</p>
Land ownership	Land in private ownership
Physical/ Development Constraints	<p>The site topography rises to the south west, however the current application proposals demonstrate a suitable scheme which can accommodate the constraints of the site, including relationship to existing residential properties.</p> <p>Access and other infrastructural requirements are constrained and will require improvement to satisfy an end use for industrial development.</p> <p>Land ownership and the availability of the site will also play a key role in its delivery.</p>
Conclusion	<p>We understand that the previous application for industrial / employment development on this site was being considered favourably subject to the submission of further information.</p> <p>At that of preparing this assessment, the submission of fresh application on the site was imminent.</p>

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Newtownbreda Factory Estate

Site Location	Site is located on the Cedarhurst Road, adjacent to Beechwood Grove in Castlereagh. It is identified on dBMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	2.79 Ha
Existing Uses	The site comprises a number of medium to large industrial/warehouse units. Current occupiers include a car sales and office/warehouse facilities.
Neighbouring Uses	Site is surrounded by residential properties, to the north by Beechwood Grove and the south Woodland Manor. A small portion of the site meets an area of open space to the south east.
Strategic Access	Site is located off the Beechhill Road, and adjacent to the proposed route of Rapid Transit Scheme. Limited connections to transport interchanges and no immediate rail connections. Not located on a Key Transport Corridor. Site has limited strategic accessibility and serves as a secondary transport location.
Market Condition and Perception	Site is fully developed out and no vacancies. Reasonable but secondary location in Castlereagh.
Development Plan Allocation	The BUAP does not identify the site for any particular use. dBMAP identifies the site as existing employment/industry (MCH 10)
Current development proposals and/or planning permission	No recent planning permissions or development proposals.
Land ownership	The site is likely to have a patchwork of ownership with acquisition of third party lands required in order to bring forward the site for a large single end user. There is however a larger floorplate building on site however constrained by site boundaries.
Physical/ Development Constraints	The site is bordered residential properties and has an irregular shape which constrains development and future use for optimum floor plate requirements.
Conclusion	Secondary location within the borough which has proved quite successful despite site constraints.

Lagan Developments (Holdings) Limited
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Caberhill Industrial Estate

Site Location	Site is located on the Beechhill Road in Castlereagh. It is identified on BMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	2.07 Ha
Existing Uses	The site comprises a number of small to medium start up business units covering a range of uses including offices and warehouse facilities. Phase II comprises office focused start up units and a significant area of car parking.
Neighbouring Uses	Site is between the residential developments of Berkley Court and Beechwood Court and backs onto an area of open space/football pitch.
Strategic Access	<ul style="list-style-type: none"> • Site is located off the Beechhill Road, and adjacent to the proposed route of the Rapid Transit Scheme. • Limited connections to transport interchanges and no immediate rail connections. • Not located on a Key Transport Corridor. • Site has limited strategic accessibility and serves as a secondary transport location.
Market Condition and Perception	Developed out as Beechhill Business Park. A mixture of offices and warehousing. High occupancy levels. Reasonable location and similar demand.
Development Plan Allocation	The BMAP identifies the site as existing employment/industry (MCH 11)
Current development proposals and/or planning permission	No recent planning permissions or development proposals
Land ownership	Unknown
Physical/ Development Constraints	The site is bordered by residential properties and has significant level changes moving throughout the site which have necessitated retaining structures and imaginative use of buildings. This topography would provide challenging when accommodating anything other than small/medium sized units on the site.
Conclusion	Secondary location within the borough which has proven quite successful.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Prince Regent Park

Site Location	Site is located on the Castlereagh Road in Castlereagh. It is identified on dBMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	18.25 Ha
Existing Uses	The site comprises a number of medium to large factory/warehouse facilities including retail/leisure use and offices. The units are located in individual plots, accessed from a central spine road and the Castlereagh Road to the south west.
Neighbouring Uses	Site is between the residential developments of Orby Drive and the Knock Road. Lands to the north east abut an area of open space.
Strategic Access	<p>Site is located on the Castlereagh Road, adjacent to the junction with Knock Road/Upper Knockbreda Road which provides immediate access to the outer ring road of the City.</p> <ul style="list-style-type: none"> • Onward connections to transport interchanges via the Ring Road, but no immediate rail connections • Not located on a Key Transport Corridor • Site has good strategic accessibility with links to the Outer Ring Road, serving as prime transport location
Market Condition and Perception	Popular trading estate but many buildings becoming dated. Medium occupancy levels reflect the low to moderate demand for space in this estate. Results of recent survey work indicate that approximately 10 acres/ 4 hectares of this zoning pertains to stock which is currently vacant and will have to be redeveloped to attract new investors.
Development Plan Allocation	<p>The BUAP does not identify the site for any particular use.</p> <p>BMAP identifies the site as existing employment/industry (MCH 12)</p>
Current development proposals and/or planning permission	<p>There is a live application (Y/2015/0080/F) for an unmanned Petrol Filling Station on part of the site fronting onto Castlereagh Road. The application was submitted on 12 March 2015 and there are a number of actions still to close out the consultation process before the application can be determined.</p> <p>There are a number of minor permissions throughout the site which would</p>

	not impact on the overall character of the zoning.
Land ownership	Numerous ownerships due to the configuration of the Industrial Park.
Physical/ Development Constraints	Proximity of residential development and the size of the plots will have a bearing on the layout. Redevelopment opportunities likely to centre on storage and distribution uses or other light industrial uses.
Conclusion	Site has a range of plot sizes and good transportation connections. Occupancy within this zoning is declining due to the ageing accommodation which is akin to the application site, however, this in turn creates new opportunities for modern, purpose built accommodation which is aligned to market requirements.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Castlereagh Industrial Estate

Site Location	Site is located on the Montgomery Road, between the Castlereagh Road and Creagh Road in Castlereagh. It is identified on BMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	32.71 Ha
Existing Uses	The site comprises a number of medium to large factories and manufacturing/warehouse facilities including retail/leisure use and offices. There are also a number of smaller business park type facilities within the wider zoning. The units are located in individual plots, accessed from the Montgomery Road.
Neighbouring Uses	Site is between the residential developments of Orby Drive and the Knock Road. A new Leisure Centre is currently under construction to the south of the site.
Strategic Access	Site is located on the Montgomery Road, adjacent to the junction with Knock Road/Upper Knockbreda Road which provides immediate access to the outer ring road of the City. The Castlereagh Road is identified within BMAP as an arterial route (BMAP Ref: AR 1/15). The site also affords access to the Creagh Road which is identified as an arterial route (BMAP Ref: 1/14) <ul style="list-style-type: none"> • Onward connections to transport interchanges via the Ring Road, but no immediate rail connections • Not located on a Key Transport Corridor • Site has good strategic accessibility with links to the Outer Ring Road, serving as prime transport location
Market Condition and Perception	Premier industrial estate in East Belfast/Castlereagh. Good occupancy levels in modern buildings, with several refurbished factories. Within this zoning there is approximately 11.53 hectares of vacant premises.
Development Plan Allocation	The BUAP does not identify the site for any particular use. The BMAP identifies the site as existing employment/industry (MCH 13)
Current development proposals and/or planning permission	No recent planning permissions or development proposals which would alter the character of the zoning

Land ownership	Numerous owners.
Physical/ Development Constraints	The site is bordered by residential properties; however this industrial/employment use is established in the area. The existing vacant buildings would require clearance to meet modern standards, and land assembly may be required to bring forward suitable sites.
Conclusion	Site has a range of plot sizes and good transportation connections. Occupancy within this zoning is relatively high in respect of the small/medium sized occupier, which may be afforded to its location and range of floorplate size on offer.

LAGMAR PROPERTIES LIMITED
Upper Newtownards Road, Dundonald
Industrial Land

Castlereagh – Ballygowan Road

Site Location	Site is located on the Ballygowan Road in Castlereagh. It is identified on BMAP Plan Ref: 2a – Metropolitan Castlereagh
Size	0.5 Ha
Existing Uses	The site comprises a number of small business units.
Neighbouring Uses	Residential properties surround the site on all boundaries.
Strategic Access	<p>Site is located on the Ballygowan Road, adjacent to the junction with Knock Road/Upper Knockbreda Road which provides immediate access to the outer ring road of the City.</p> <ul style="list-style-type: none"> • Onward connections to transport interchanges via the Ring Road, but no immediate rail connections • Not located on a Key Transport Corridor • Site has good strategic accessibility with links to the Outer Ring Road, serving as prime transport location
Market Condition and Perception	Small site with awkward access. Buildings are dated but suit local businesses. Low demand.
Development Plan Allocation	<p>The BUAP does not identify the site for any particular use.</p> <p>The BMAP identifies the site as existing employment/industry (MCH 15)</p>
Current development proposals and/or planning permission	No recent planning permissions or development proposals
Land ownership	Given the limited size of the site, likely to be in sole ownership.
Physical/ Development Constraints	The site is bordered by residential properties, however this industrial/employment use is established within the area. The site has significant topographical challenges with levels increasing from north to south. The access is tightly constrained onto the Ballygowan Road.
Conclusion	Site offers limited opportunities for a larger end user. The small unit sizes are constrained, however, the site's good transport connections are reflected in the high occupancy rate.

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**Appendix 2: Department of Environment Case
Officers Report Y/2010/0087/O**

Article 31 Planning Application Final Development Management Report

Y/2010/0087/O

Proposal: Demolition of existing buildings and structures and the construction of a retail store (Class A1); Petrol Filling Station (sui generis); industrial units (Class B2 and B4); and associated highway, footpaths, landscaping and other works and improvements.

Location: Lands at the former Rolls Royce factory, Upper Newtownards Road/Carrowreagh Road, Dundonald.

Applicant: Sainsbury's Supermarket Ltd & Lagmar Properties Ltd.

Strategic Projects Team

Planning Service HQ

May 2013

1.0 THE PROPOSAL

1.1 The original application was submitted seeking outline planning permission for the demolition of existing buildings and structures and the construction of:

- a retail store (foodstore) of 9,400m² gross (6123m² net);
- petrol filling station with a kiosk of 186m² gross (130m² net);
- a hotel;
- industrial units comprising Light Industrial Units (Use Class B2) with a total floorspace of 2,000m² and Storage/Distribution Units (Use Class B4) with a total floorspace of 4,400m²; and
- associated highway, footpaths, landscaping and other works and improvements.

The proposal was subsequently amended to remove the hotel element, which has been replaced with an additional 2,000 m² of additional light industrial floorspace (Use Class B2). The planning assessment is based on the amended scheme.

2.0 SITE AND SURROUNDING AREA

2.1 The site, of approximately 7.6 hectares, is located on the Upper Newtownards Road to the east of Dundonald within the existing Dundonald Industrial Estate. There were a number of factory, warehouse and office buildings on the site which were formerly occupied by the Rolls Royce Factory and more recently by TK-ECC Limited (Seat Belt Factory) until they were vacated in 2004. Some of the buildings were used temporarily for storage by Lidl until 2010. However during the processing of this application most of the buildings have been removed and the site has been cleared. The shell of the former social club on the eastern part of the site and the security building at the entrance remain although they are a poor state of repair. The site is generally flat and bounded by a post and wire mesh security fence however there is a steep grass bank along the rear boundary and in the north west area of the site with a car park on higher ground adjoining Carrowreagh Road above.

2.2 The main entrance to Dundonald Industrial Estate bounds the western boundary of the site. Industrial units within Carrowreagh Business Park lie on higher ground to the rear of the site and there are larger industrial buildings to the west. The Carrowreagh Road bounds the eastern boundary of the site with residential development beyond on much higher ground and separated by a steep landscaped belt. The site can be clearly viewed from the Upper Newtownards Road although there is a bank of landscaping along the frontage and the site lies below the level of the road.

2.3 In the Draft Belfast Metropolitan Area Plan 2015 (BMAP) the site lies within the development limit and is part of a 35 hectare site zoned as Existing Employment /Industry (MCH 09 – Land at Upper Newtownards/Carrowreagh Road). The application site occupies one fifth of the overall zoning.

3.0 PLANNING ASSESSMENT

A summary of consultee comments, representations and information on the process history of the application and planning history of the site can be found in the appendices. The application falls to be assessed under the relevant policy criteria and all relevant material considerations. The main considerations are:

- Regional Development Strategy and PPS 1;
- Development Plan Context and prematurity;
- Economic considerations;
- PPS 4: Planning and Economic Development;
- Industrial land supply;
- Retail impacts;
- Traffic impacts and car parking;
- Noise/Pollution impacts;
- Residential amenity impacts;
- Landscape and visual impact; and
- Flooding/Infrastructure considerations.

3.1 Regional Development Strategy (RDS) and PPS1

The Regional Development Strategy is material to decisions on individual planning applications but does not contain operational planning policy and guidance which is issued through Planning Policy Statements.

Regional Guidance RG1 of the Regional Development Strategy 2035 seeks to ensure an adequate supply of land to facilitate sustainable economic growth through the protection of zoned land which it states provides a valuable resource for local and external investment and thereby contributes to the PfG. It looks to development plans to provide an adequate and continuous supply of land for employment purposes. The Spatial Framework Guidance SFG 1 seeks to promote urban economic development at key locations throughout the Belfast metropolitan urban area and ensure sufficient land is available for jobs. There is no specific reference to Castlereagh District or Dundonald with the RDS 2035.

RG 7 of the Regional Development Strategy 2035 seeks to support urban and rural renaissance and states that regeneration is necessary to create more accessible, vibrant city and town centres which offer people more local choice for shopping, social activity and recreation.

Paragraph 59 of PPS 1 states that the Departments guiding principle in determining planning applications is that development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance.

3.2 Development Plan Context and Prematurity

Under the current statutory plan, the **Belfast Urban Area Plan 2001 (BUAP)**, the site lies within the limit of development of the Belfast Urban Area and is not zoned. The lands to the rear of the existing industrial lands were zoned for industry and commerce. Under the **Draft Belfast Metropolitan Area Plan 2015 (BMAP)** the site lies within the settlement development limit for Metropolitan Castlereagh and within an area of existing Employment/Industry (Zoning MCH 09 – Land at Upper Newtownards/Carrowreagh Road). There is therefore conflict between the statutory Plan and the draft Plan.

Zoning MCH 09 has a number of Key Site Requirements including that the land should only be developed for light industrial, general industrial or storage and distribution uses and that a master plan for the site should be agreed with the Department. This proposal includes industrial uses on almost half of the site and a food superstore on the remainder. The retail part of the proposal would be contrary to the first key site requirement. The proposal is therefore contrary to Draft Zoning MCH 09, and as a consequence prematurity issues should be considered.

Four objections to the proposed Zoning MCH 09 were submitted. These generally indicate that the scope for possible industrial uses should be widened and that the Designation should be identified as a Major Employment Location. However none of these objections seek the inclusion of retailing within the site or object to the designation itself. There is therefore a significant degree of certainty that the land will be zoned as existing employment land within the adopted Plan.

The Department has received the BMAP Public Inquiry PAC report which has now been published by the Department. The PAC has recommended no change to the existing employment zoning. Whilst the Plan has not yet been adopted it is likely that the Department will accept this recommendation, unless there is a very good reason not to. In publishing the PAC reports, the Minister clarified the status of the reports and stated that where it is likely that the proposals in the draft Plan will not be changed as a result of the PAC recommendations, applications will be decided on the basis of the Plan, but also with regard to all other material considerations. This is consistent with the Joint Ministerial Statement on prematurity which states that considerable weight should be attached to proposals which have a strong possibility of being adopted and replacing those in the existing Plan.

Approval of this proposal is therefore not considered premature in that it will not prejudice or predetermine any decision which remains to be taken as part of the plan process. It is not considered that this proposal would set any significant precedent as the possibility of similar proposals on existing employment zonings within dBMAP coming forward and reaching a conclusion before the Plan is adopted is small. It is therefore considered that the proposal should be considered in the context of prevailing planning policy and the draft Plan and that prematurity does not arise.

3.3 Economic Considerations

The Programme for Government (PfG) 2011-2015 states that the Executive has taken the important step of making the economy the top priority in the PfG. Priority 1 is “growing a sustainable economy and investing in the future” and a key commitment under this priority is to ensure applications with job creation potential are given additional weight. The Executive’s Economic Strategy further sets out their economic priorities aimed at rebalancing the economy to improve wealth, employment and living standards and rebuilding the economy to address the impact of the global economic downturn, particularly on employment. The applicant urges the Department to consider the proposal against the background of the NI Executive’s top strategic priority of economic growth as outlined in the PfG and the specific objectives of PPS 4.

The Economic Impact Study undertaken by Oxford Economics outlines the economic benefits of the proposed development which are summarised below:

- It is estimated that the project will create a net employment benefit of 492 direct additional jobs resulting in additional wages of £8.7m, 224 indirect jobs worth £4.9m in wages and 139 induced jobs worth £2m in wages. The total of 855 jobs and £15.55m in wages are on the basis that the industrial and storage units are fully utilised;
- The Sainsbury’s element only will generate a net employment benefit of 328 (67%) direct additional jobs resulting in additional wages of £5.32m (61%), 138 (62%) indirect jobs worth £3.1m (63%) in wages and 86 (62%) induced jobs worth £1.23m (61%) in wages. The percentages of the benefits of the entire project are given in brackets. The 552 jobs and £9.65m in wages equate to approx. two thirds of the total potential benefits of the project;
- It is estimated that the project will generate 210 direct construction job years of employment and a further 200 indirect or induced construction job years worth a total of £7.7 million in wages;
- The total employment created could produce a further £3.15m in tax receipts per annum during the construction phase and ongoing tax benefits of £6.22 per annum with an associated saving of £2.19m on welfare benefits during construction and £4.6 per annum ongoing thereafter plus more income in commercial rates;
- Sainsbury’s have undertaken to advertise their jobs in local Job Centre Branches and establish a Local Employment Partnership with local stakeholders to ensure positions are primarily filled by local people. They consider this as an opportunity to advance a ‘Targeting Social Need’ initiative and state that they will achieve this by delivering a package of training and skills in key entry level areas and guarantying an interview to all those passing this training. A planning condition governing agreement of the details of the LEP has been suggested; and
- It is also stated that the development would bring a range of wider economic and social benefits which complement existing strategies for the local area, e.g. the Council’s Economic Development Strategy and

for Northern Ireland as a whole, e.g. the Regional Development Strategy through job creation and physical regeneration and has the potential to act as catalyst for further investment in the area.

The above estimates of job creation factor in a 35% displacement rate for retail based jobs and 20% for all other jobs. The direct benefits are likely to be concentrated in the local economy with the indirect and induced benefits felt over a wider area. Some of the jobs created will be part time however the Study indicates that these are equally important to the local economy and offer additional flexible opportunities for work.

The Economic Impact Study also indicates that Carrowreagh is a diverse ward with pockets of higher deprivation than the average. The ward has a relatively youthful and growing population, providing a larger than normal stock of labour for local businesses. The % of working age people claiming benefit has risen from 1.1% in 2008 to 3.9% in 2013 in the ward although this is still lower than the NI average at 5.7%. The job creation potential of this proposal means that it aligns with the objectives of the Executive's Anti Poverty and Social Exclusion Strategy which aims to tackle area based deprivation and recognises that employment is the best route out of poverty.

A number of representations have been submitted from local employment agencies illustrating their willingness to work with Sainsburys to secure employment for the local population.

The economic benefits of the proposal are also emphasised in the representations of support received which highlight the gains in terms of job creation in an area of high unemployment. Castlereagh Borough Council has also expressed their support for the proposal which they consider will create jobs in an area of high unemployment and will complement other large stores and smaller shops in the area. They also state that the development will provide the opportunity for developers to take on apprentices and the area, which has well developed transport links, will benefit from regeneration of a derelict site. Castlereagh Borough Council is also supportive of the increased number of industrial units in the amended scheme.

3.4 PPS 4: Planning and Economic Development

Planning Policy Statement (PPS) 4: Planning and Economic Development sets out the Department's policy objectives for economic development uses. These are:-

- To promote sustainable economic development in an environmentally sensitive manner;
- To tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality, size and location;
- To sustain a vibrant rural community by supporting rural economic development of an appropriate nature and scale;

- To support the re-use of previously developed economic development sites and buildings where they meet the needs of particular economic sectors;
- To promote mixed-use development and improve integration between transport, economic development and other land uses, including housing; and
- To ensure a high standard of quality and design for new economic development.

A number of representations have been received in respect of the assessment of the proposal against PPS4 and in particular Policy PED7. The views have been taken into account and the Department's assessment of PPS 4 is set out as follows.

Policy PED 9 sets out general criteria against which proposals for economic development uses will be required to meet. These are concerned with amenity, flooding, noise traffic etc. Some of these are dealt with below and the remaining design matters can be addressed at reserved matters stage.

The proposal incorporates light industrial and storage/distribution units (Class B2 and Class B4). This element of the proposal is compliant with the policy requirements as set out in PPS 4.

Policy PED 7

Policy PED 7 sets out the policy framework for consideration of non-economic development uses on zoned and unzoned industrial land. The site is zoned in draft BMAP as an Area of Existing Employment/Industry (MCH 09) and is highly likely to be zoned within the adopted plan. However the site currently remains unzoned within the existing statutory plan. For the purpose of consideration under PPS 4 Policy PED 7 it is considered that the application should be assessed on the basis of the policy for zoned land.

Under 'Zoned Land in All Locations', policy PED 7 states that development that would result in the loss of land zoned for economic development use in a development plan (either existing areas or new allocations) to other uses will not be permitted, unless the zoned land has been substantially developed for alternative uses. Neither the site itself nor the zoning have been substantially developed for alternative uses. An exception will also be permitted for a compatible sui generis use which will not lead to a significant diminution of the employment land resource. The petrol filling station is the only sui generis employment use proposed representing only a small element of the overall proposal. PED 7 further states that retailing or commercial leisure development will not be permitted except where justified as acceptable ancillary development. The retail element of the proposal forms over half of the new floorspace proposed and could not be described as ancillary.

The proposal does not meet any of the exceptions and therefore is not considered to be in accordance with Policy PED 7 when assessed against as 'Zoned Land in All Locations' as set out above. This is also the position adopted by the applicant in their planning statement.

Objectives of PPS 4

The Planning Statement Addendum submitted August 2011 acknowledges that the site is essentially zoned land and does not meet the policy tests of Policy PED 7 but argues that the provisions of Policy PED 7 should not prevail. They state that the key factor which serves to outweigh policy is the fact that a Scheme of B Class Employment Uses only would not be financially viable and adherence to policy would sterilise the site. It also contends that the proposal complies with the 5 relevant policy objectives of PPS 4 and will deliver lasting benefits for the local area. The following points are made in support of this position;

- There is no realistic prospect of the site coming forward for wholly PED 7 uses in either the current market or on the basis of any realistic assumptions regarding the market in the foreseeable future.
- The applicant contends that the current proposal is a sustainable economic development opportunity in line with objective 1 of PPS 4 which will secure the early delivery of a wide range of job opportunities;
- the developer is content that an agreed percentage of the light industrial and storage units are delivered prior to occupation of the foodstore;
- The proposal poses no harm to the future industrial land supply and will provide jobs and tangible employment benefits for the local area which should weigh significantly in the planning balance. As such the proposal complies with objective 2 of PPS 4;
- The proposal complies with objective 4 of PPS 4 in that it will result in the re-use of a previously developed economic site which would otherwise fail to come forward;
- The proposed mixed use development is compatible with surrounding uses and offers the only viable basis for redevelopment and the realisation of regenerative benefits in line with objective 5 of PPS 4; and
- All buildings will be of a scale, design and finish appropriate to the locality and complies with objective 6 of PPS 4.

3.5 Industrial Land Supply

The purpose of Policy PED 7 is to protect a generous supply of industrial land identified in development plans and the proposal would result in diminution of that supply. The applicant has undertaken an assessment of existing and proposed industrial land within Castlereagh District and East Belfast as far as the Castlereagh Road. This was undertaken initially to establish whether the site was a vital local industrial land resource under the previous PPS 4 policy and has been updated in 2011 and submitted to support of the compliance of the proposal with the current PPS 4 objectives.

Using an annual take up of 2.2 ha per annum based on build rates between 2001 and 2009 and a supply at 2011 of 89 ha (or 96 ha including the application site), the applicant contends that there is a 40 year supply available. This 89 hectare supply is primarily made up of lands at Purdysburn/

Knockbracken where 59 ha has been allocated for a business park, 16 ha undeveloped lands to the rear of the application site, 9 ha at Comber Road and 4.6 ha within Castlereagh Industrial Estate and does not take account of vacancy within existing sites or lands at Titanic Quarter which could also be said to lie in the east of the city.

The loss of industrial land to the foodstore is only 3.76 ha or 4 % of the overall supply and when set within the context of the remaining sites, is not considered to be an essential component of that supply or represent a significant loss. However zonings MCH 08 and 09 comprise the only land available within Dundonald, the remainder located some distance away in Castlereagh and Knockbracken. There is a generous amount of land still available for economic development within zoning MCH 09 and the loss of a proportion to a foodstore (11%) would not jeopardise future investment or job creation within the locality. Indeed the proposal will actually secure the development of some economic development land (3 ha or 8.6% of zoning).

Invest NI were initially concerned about the loss of industrial land particularly given that the lands at Knockbracken and the remaining lands within MCH 09 will only become available to developers in the longer term and reliance on the supply at Knockbracken would not allow for a balanced spread of opportunities. However they recognise that the scheme has been amended to increase the proportion of the site allocated for employment uses which makes progress towards retention of an important resource.

The supply of industrial land that needs to be readily available relates to the demand for that land. A report by BTW Shiells in March 2010 indicates that Dundonald is a secondary location as it does not benefit from high accessibility necessary to support national / regional scale industrial and distribution operations. If any demand exists in Dundonald, it is to serve growing local firms who require bigger accommodation close to their existing customers although their requirements will tend to be small scale. The site has been marketed for a number of years with no serious interest from occupiers. The BTW Shiells report confirms that the buildings were physically obsolete in terms of modern day industrial occupier requirements, either manufacturing or storage and distribution, and the option of refurbishing was not economically viable. BTW Shiells also advise that no developer or bank would build out the entire site for industrial purposes without a significant pre-let /sale or other incentives. This is supported by a Development Appraisal and Viability Report which states that a direct application of the policy would render the site incapable of development for at least 10 years. The Report analyses a notional scheme of development for B2 and B4 uses and concludes that development of the whole site would make a catastrophic loss given the current economic climate. Although these uses would generate sufficient return if market conditions eased, the distinguishing factor of the site is its size which bears heavily on its viability.

In June 2011, BTW Shiells provided an update that indicated that demand for industrial land or buildings was extremely low and had even worsened. They state that the small level of demand from indigenous local businesses can be

accommodated in existing estates, and any larger inward investment opportunities are likely to earmark the prime locations around Greater Belfast which have the advantage of access to good transport links. They state that even partial development of the site for industrial units, although viable, is risky in the present economic climate. This information on the current demand for industrial land in this location lends support to the argument that the loss of 3.76ha would not significantly endanger overall supply.

3.6 Retail Impacts

Planning Policy Statement (PPS) 5 Retailing sets out the Department's policy objectives for town centres and retail developments. These are:-

- To sustain and enhance the vitality and viability of town centres;
- To focus development, especially retail development, in locations where the proximity of businesses facilitates competition from which all consumers are able to benefit and maximises the opportunity to use means of transport other than the car;
- To maintain an efficient, competitive and innovative retail sector; and
- To ensure the availability of a wide range of shops, employment services and facilities to which people have easy access by a choice of means of transport.

The proposal contains 2 retail units including a foodstore of 9400m² gross (6123m² net) and petrol filling station kiosk of 186m² gross, total retail floorspace 9586m² gross. The proposal represents a major retail development as the total floorspace proposed is over 1,000 m² gross retail floorspace and the application is accompanied by a Retail Impact Assessment (RIA) in accordance with the requirements of PPS 5.

A number of objections received raised concerns regarding the impact of the proposal on existing centres and these comments have been taken into account in the Department's consideration of retail impact.

Dundonald is designated as a local centre in Draft BMAP under Designation MCH 20 and a boundary delineated to control retail activity within the centre. The plan states that the local shopping centre provides shoppers in Dundonald with accessible convenience and non bulky comparison shopping close to where they live. There have been no objections to the designation of Dundonald as a local centre, any objections relating to the boundary itself and the overall arching policy for retail development within local centres. There were also no objections to the designation of Connswater or Forestside District Centres, any objections relating to the inclusion of additional lands and not upheld by the PAC. By virtue of the Minister's statement in relation to proposals in the draft plan which will not be changed as a result of PAC recommendations, Dundonald local centre (which includes the existing Asda store), and Connswater and Forestside District Centres enjoy protection in accordance with prevailing regional policy contained with PPS 5.

Draft PPS 5 published in July 2006 however given the policy is in draft form the proposal is assessed against the extant PPS 5.

3.61 The Acceptability of the Proposed Retail Floorspace.

The proposal has been carefully assessed in terms of current retail policy set out in PPS5, particularly the effects on established retailing centres.

The site is former industrial land and the principle of retailing has not been established on the site.

The application proposes the erection of a foodstore with a gross floorspace of 9400sqm and accompanying petrol filling station with a gross floorspace of 186sqm. The net retail floorspace of the foodstore is 6123sqm comprised of 3980sqm convenience and 2143sqm comparison retailing. The net retail floorspace of the petrol filling station is 130sqm.

3.62 Complements or meets existing deficiencies in the overall shopping provision.

The applicant's contention that the proposal will provide an alternative store and additional choice for residents of Dundonald is accepted by the Department. While it is considered that there is no convenience deficiency within the catchment, the proposal, could be considered to complement the existing shopping facilities offering choice and competition. Overall it is considered that the proposal meets this criterion.

3.63 Is unlikely to lead to a significant loss of investment in existing centres.

The Department at the time of determination has no firm evidence of a specific loss of investment associated with the approval of this application. The loss of investment test must relate to a specific loss of, or risk to investment proposals within a protected centre and not a generalised fear of some future loss of investment. Documentary evidence has not been submitted by third parties in respect of the issue of loss of investment.

3.64 Is unlikely to have an adverse impact on the vitality or viability of an existing centre or undermine its convenience or comparison shopping function.

In regard to vitality and viability, paragraph 18 of PPS 5 states that "vitality is a measure of how busy a centre is and viability is a measure of its capacity to attract ongoing investment for maintenance, improvement and adaption to changing needs."

Dundonald consists of two retail focus points. The Comber Road is home to a number of small independent retailers including a petrol filling station shop, convenience store, chemist and motor parts shop. The largest concentration of retail floorspace is however, located in the area in and around the junction of Church Road and the Upper Newtownards Road and includes an Asda foodstore, B&M Bargains, petrol filling station with associated shop and other smaller independent convenience and comparison retail units. This cluster of

retailing is afforded policy protection and is referred to as Dundonald Local Centre. Given the proximity of the proposal (less than 2 minutes) to this local centre, it is the Department's opinion that the proposal will draw the majority of its trade from this centre. As such, Dundonald Local Centre is most likely to be affected by the proposal experiencing detrimental convenience impacts in excess of 81% and detrimental comparison impacts in excess of 94%.

There appears to be a number of inconsistencies between the applicant's quantitative assessment and the text included in the supporting retail information. In particular, Forestside District Centre whilst included in the applicants impact tables is referred to as outside their study area. Forestside is however, identified within the Departments 0-15 minute catchment area and the results of the shopper surveys demonstrate that many of those residing within this catchment regularly undertake their main food shopping at the Sainsbury's store there. The availability of a Sainsbury's at Dundonald is therefore likely to alter such shopping patterns with those who currently carry out their main food shopping at the centre opting to redirect their trade to a store closer to home. With this in mind, the proposal is likely to undermine the convenience function of Forestside District Centre generating an impact of approximately 15%. The proposal is however, unlikely to harm the comparison function of this centre.

Newtownards consists of local independent convenience and comparison retailing in the town centre and a broad mix of national multiple operators located at the Ards Shopping Centre. The Department accepts that the proposal will offer greater choice particularly for those living in Newtownards and thus have the ability to intercept a proportion of trade currently flowing towards the town centre and other retailers at Ards Shopping Centre and Castlebawn. Whilst the Department considers the convenience impact of the proposal on Newtownards Town Centre to be in the region of 12%, the cumulative impact of the comparison element of the proposal is somewhat higher at 48%.

The Department has also considered the impact of the proposal on other retailing within the catchment area. The Department's sensitivity analysis has shown that the proposal will generate impacts on retailing at Ards Shopping Centre and Castlebawn; however these retailing facilities are in out-of-centre locations and thus afforded no policy protection under PPS 5.

The supporting retail information put forward by the applicant has been assessed and the Department concludes that the proposal will draw adverse amounts of trade away from Dundonald Local Centre, Forestside District Centre and Ards Town Centre. The impact of the proposed retail store and petrol filling station would result in the turnover of those centres being reduced. The proposal therefore fails to satisfy the third criterion of paragraph 39 of PPS 5 as the proposed development will have an adverse impact on the vitality and viability of protected centres and undermine their convenience and comparison function.

3.65 Alternative Sites

Paragraph 41 of PPS 5 states that proposals for food supermarkets and food superstores on sites outside town centres, including edge of centre sites, may be acceptable provided that the proposal satisfies all the criteria set out in paragraph 39. In addition, the availability of suitable sites, for the proposed development, within the town centres, in particular those which have been identified in a development plan, will be an important consideration. This paragraph differs in emphasis from paragraphs applicable to comparison shopping and mixed retailing or retail warehouses which advocate a sequential test. The PAC has held that the alternatives sites come into play where there are clear disadvantages to the application site and the key question in assessing a proposal for a foodstore is whether it is unacceptable in itself having regard to the development plan, other policy guidance and the facts of the case.

The applicant has submitted an assessment of the suitability and availability of town centre, local centre and edge of centre sites in Dundonald and Comber. They have concluded that the alternative sites assessed are unable to accommodate the proposal due to their size, availability or development constraints. The Department would concur with this assessment.

The applicant states that in relation to Newtownards, the Department has agreed that there are no town centre sites that could accommodate the scale of development proposed. The Department would concur with this assessment as all the Development Opportunity Sites are too small or not suitable in design terms for a modern foodstore. The application for retail led mixed use development within Newtownards town centre would appear too small to accommodate a larger store of this size and associated car parking and still maintain the street frontages.

3.7 Traffic Impacts and Car Parking

The proposed scheme incorporates a significant amount of car parking associated with the retail element of the scheme which in conjunction with other elements of the scheme including the Petrol Filling Station will attract a considerable increase in vehicle movements on Upper Newtownards Road/Carrowreagh Road and surrounding roads. The concept layout indicates that the foodstore and half of the light industrial units will be accessed from Carrowreagh Road with the remaining light industrial units, storage units and the servicing yard accessed from Ballyoran Lane. The proposal includes improvements to the Upper Newtownards/Carrowreagh Road junction to accommodate separate left and right turning lanes, signalling Ballyoran Lane to a similar standard as that existing at Carrowreagh Road and works to the Carrowreagh Road.

A Transport Assessment was submitted in November 2010 and concluded that the proposed development can be adequately accommodated within the surrounding infrastructure without significant highway impact. Roads Service has commented on the application on a number of occasions and requested further information. Following the submission of revised TA information in July

2011 Roads Service commented that the application was unacceptable in its current form and provided a review of the TA. Subsequently a further TA submission was received in April 2012. Roads Service responded on 21 August 2012 and stated they had no objection to this proposal subject to a number of planning conditions relating to access, car parking provision, provision of turning areas and the promotion of alternative modes of transport for the development. A condition is also included relating to the requirement for technical approval from Roads Service (in accordance with *BD2 Technical Approval of Highways Structures: Volume 1: Design Manual for Roads and Bridges*) for any highway structure or retaining wall forming part of the proposal.

A number of objections received raised concerns regarding the impact of the proposal on the local road network which have been taken into account during the consideration and assessment of the Transport Assessment information received. There is no suggestion that roads issues warrant refusal of the application.

The concept layout indicates generous levels of parking for the industrial and storage units and for the foodstore. The precise levels of car and cycle parking and public transport links can be agreed at Reserved Matters stage.

3.8 Noise/Pollution Impacts

The Environmental Health Department (EHD) of Castlereagh Borough Council in their initial comments indicated that there were no objections subject to compliance with all relevant legislation and commented that the service yard for the retail store has the potential for noise disturbance at the residential properties on the opposite side of the Carrowreagh Road which are 2 storey and at a higher level than the applicant's site, particularly if 24 hr servicing is to take place. EHD recommends a number of planning conditions and informatives relating to air quality, contaminated land, hours of operation, location/layout of equipment. EHD further commented on the proposal following the submission of the Phase II Ground Conditions and Contamination Assessment Report and re-iterated that there were no Environmental Health objections in principle subject to compliance with all relevant legislation and recommended planning conditions relating to remediation. During the processing of this application, the Council have designated Dundonald village as an Air Quality Management Area. They perceive that this proposal could increase traffic through the village and exacerbate the situation. However they are not recommending refusal of development in principle and it is unclear how an Air Quality Assessment at Reserved matters stage could help once outline permission is granted.

NIEA Land and Resource Management (LRM) Unit initially commented that the Preliminary Risk Assessment (PRA) submitted with the application identified a number of potential pollutant linkages which may present unacceptable risks to human health or environmental receptors and recommended that the applicant agree and submit a quantitative risk and remediation strategy in support of the proposed development. Following submission and consideration of the Phase II

Ground Conditions and Contamination Assessment Report LRM commented that a number of areas of uncertainty remain and recommended the submission of additional information. Subsequently LRM commented that they had no further objections subject to conditions and informatives following the submission of further additional information.

Water Management Unit response recommended a number of measures to be incorporated into the scheme and provision of a Method of Works statement to avoid and mitigate against potential pollution of receiving waterways. Such recommendations would be included as informatives in any planning decision to approve.

Rivers Agency did not raise any issues regarding pollution and recommended informatives to be included in any planning decision to approve.

A number of representations received raised concerns regarding noise and potential pollution issues. However there is no suggestion in consultation replies that such issues warrant refusal of the application subject to the inclusion of appropriate conditions and informatives in any decision to approve.

3.9 Residential Amenity impacts

Representations received highlight issues regarding impact on the amenity of the residential area to the east of the development including noise, traffic/safety and visual amenity issues.

Residential development is located to the immediate east of Carrowreagh Road opposite the application site and to the south on the opposite side of the Upper Newtownards Road. A landscaped embankment defines the boundary between Carrowreagh Road and the adjoining residential development to the east. The residential development to the east of Carrowreagh Road is situated on higher ground to the application site. Castlereagh Borough Council has indicated that the service yard for the retail store has the potential for noise disturbance for these residential properties particularly if 24 hour servicing is to take place. However they do not consider that these issues warrant refusal of the application provided appropriate conditions and informatives are included within any decision to approve.

The service yard as set out in the Design Concept Statement - Addendum of April 2012 shows access to and from Ballyoran Lane which is located on the western boundary of the site. There is approximately 100 metres between the service yard and the residential development to the east with Zone B (Light Industrial Use Class B2) and the Carrowreagh Road including the landscaped embankment in between which would act as a noise buffer/screen. Details of the location, layout, hours of operation and equipment to be used in the retail service yard would appropriately be provided at reserved matters stage to further assess whether there would be any detrimental impact on residential amenity of the neighbouring properties. Castlereagh Borough Council

Environmental Health Department has recommended a condition restricting delivery times to reduce the risk of noise disturbance.

The visual impact of advertisements associated with the proposed supermarket is highlighted in a representation. As this is an outline application it is considered appropriate that details of signage be provided at Reserved Matters stage at which point further consideration will be given to the impact of the development on residential amenity. Details of lighting should also be provided at Reserved Matters stage. It is considered that at present potential noise nuisance, light pollution or prominent signage would not warrant refusal of the application and result in unacceptable damage to residential amenity.

3.10 Landscape and Visual Impact

It is considered that the proposed scheme will provide the opportunity to enhance the site with the development of modern buildings in a landscaped setting. Landscape Architects Section (LAS) have indicated that there should be a robust and proportionate landscape framework/structure plan which should provide a setting for the various elements as well as screening and softening the buildings and associated hard landscape elements. It is considered that such details should appropriately be provided at Reserved Matters stage and will address concerns raised in representations regarding the lack of landscaping within the proposed car parking area. The parameter plans illustrate existing landscaping to be retained. Particularly important will be the retention of the landscaping belt along the front of the site and as much of the existing landscaping along Carrowreagh Road as is possible with widening of the road.

3.11 Flooding / Infrastructure Considerations

Rivers Agency comments did not raise any concerns regarding flooding and indicated that a designated watercourse lies a short distance to the north of the northern boundary of the site. They are not aware of the existence of any culverted undesignated watercourses within or in the immediate vicinity of the site and the site does not lie within a fluvial flood plain.

In considering comments in a representation which stated that the size of the impermeable surface will impact on the surface water run-off, Rivers Agency has indicated that they agree with the conclusion in the Drainage Strategy that there will be no significant additional flows into the surface water sewer network. Rivers Agency also indicated in relation to comments in a representation about flood risk that the Drainage Strategy states there is no history of flooding at the site and considered that as the site is extensively developed at present there should be no significant increase in flood risk.

NI Water has recommended conditions and informatives to be attached to any decision notice if appropriate and have indicated that a Pre Development

Enquiry (PDE) is required and Coastal Clear Water Ltd should be contacted in relation to available capacity within Kinnegar Waste Water Treatment Works.

4.0 CONCLUSION

4.1 After fully assessing the development proposals and the information submitted including the Retail Impact Assessment, the Transport Assessment, supporting documentation including the comments of all consultees, letters of objection, and having regard to the relevant planning policy context, the statutory development plan and draft development plan and all other relevant material considerations, the following conclusions have been reached;

- The proposed development will result in significant detrimental retail impact on the protected Dundonald local centre, and will also have impacts on Forestside and Newtownards Town Centre;
- The proposal is contrary to Policy PED 7 in that it would result in the loss of land zoned for economic development use in a development plan;
- There is adequate supply of industrial and employment land within the local area and within Castlereagh as a whole and the loss of 3.76 ha to retail use would not jeopardise the future supply;
- Given the present economic situation and market for industrial units, the submitted scheme represents the only realistic opportunity for achieving the development of any economic uses on the site in the foreseeable future. The proposal will also facilitate the early implementation of employment uses which are in line with the development plan zoning;
- The proposal will have significant benefits for the economy in terms of investment and job creation in Castlereagh;
- The proposal would represent a very significant boost to the local economy through direct, indirect and induced job creation. The applicant has also committed to a initiative which will ensure that the direct jobs created will be filled, in so far as possible, by people from the local community; and
- The proposal represents a large investment in the economy, will allow for indigenous business growth in the industrial units and will generate a significant amount of employment. It therefore aligns with the economic objectives of the Programme for Government 2011-2015 and the Economic Strategy.

4.2 While accepting that the proposed scheme will have significant impacts on local retail developments and will result in the loss of industrial land, these impacts have to be set against the significant economic benefits of the proposal to both the construction industry and the local population. On balance it is concluded that the significant economic benefits of the proposal in terms of job creation and investment are sufficient to outweigh the policy issues and the retail impacts, particularly in view of the alignment of the proposal with high level NI Executive Strategies, the wider supply of land and market for industrial led development and the company's willingness to secure employment for local people through a Local Employment Partnership.

- 4.3 Significant weight should be given in this instance to the amount of employment generated by the development and the efforts that will be made by Sainsbury's to ensure the benefits are felt in the immediate local area by working with local stakeholders to provide training and access to employment opportunities for local people, including the long term unemployed. This is a finely balanced recommendation and is weighed in favour of the proposal provided the local economic benefits are realised. Castlereagh Borough Council has also registered their strong support for the proposal.
- 4.4 The Department is content that almost half the site has been secured for economic development uses and the applicant has agreed to construct no less than 1000 sqm of the employment units to shell specification in zone B at the same time as the foodstore/petrol filling station to ensure early implementation of economic development uses on site with construction of the remainder within this zone once these units have been leased or sold. The omission of the hotel element and the increase of industrial uses within the site from 30% to 45% in response to comments from Invest NI also weigh in favour of the proposal and decreases the amount of land lost to non economic uses. However Invest NI remain concerned about devaluing the protection PPS 4 affords to industrial land in general and representations have also raised the issue of precedent. It is considered however that the unique set of economic circumstances described above is justification for setting the policy aside in this instance and should not result in a significant precedent elsewhere.

5.0 RECOMMENDATION

- 5.1 Article 31(2) empowers the Department to request that the Planning Appeals Commission hold a public inquiry for purposes of considering representations on the application. The alternative is to serve a Notice of Opinion on the applicant indicating the decision which the Department proposes to make on the application.
- 5.2 The Department may cause a local public inquiry to be held where it is considered that the inquiry will provide additional information to inform the Department in making a final planning decision. The key test for the Department in deciding the process route is whether a public local inquiry is necessary to provide a forum for presentation and consideration of issues arising from the representations received and which need to be assessed to allow the Department to determine the application. In this case it is considered that an Article 31 public inquiry is not required to consider representations on the application and that a Notice of Opinion be issued.
- 5.3 The proposal has been considered having regard to the all the material considerations, including all documentation submitted with the application, the relevant planning policies, the views of bodies with environmental responsibilities and the letters of objection. Having weighed all the considerations it is recommended that the application, on balance, should proceed by way of a Notice of Opinion to Approve.

ARTICLE 31 DETERMINATION	
Application No:	Y/2010/0087/O
Proposal:	Demolition of existing buildings and structures and the construction of a retail store (Class A1); Petrol Filling Station (sui generis); industrial units (Class B2 and B4); and associated highway, footpaths, landscaping and other works and improvements.
Location:	Lands at the former Rolls Royce factory, Upper Newtownards Road/Carrowreagh Road Dundonald
The above application was considered at an Article 31 development control group meeting:	2013
DC Group recommendation:	Notice of Opinion to Approve
Group Signatures:	<ol style="list-style-type: none"> 1. 2. 3. <p>Date: 31 May 2013</p>

Appendix 1 – Summary of Consultation Responses

In processing the application the following bodies were consulted upon receipt of the application and subsequently upon receipt of any amended drawings or relevant information.

Department of the Environment for NI

NIEA – Land and Resource Management Unit

NIEA - Water Management Unit

Landscape Architects Section

Strategic Planning Division – Design Unit

Belfast Planning Area – Belfast Metropolitan Area Plan Team

Belfast Planning Area Office

Department for Regional Development

Roads Service

Department of Agriculture and Rural Development

Rivers Agency

Castlereagh Borough Council

Chief Executive

Environmental Health

Northern Ireland Water

Invest NI

Northern Ireland Electricity

Following circulation of the application and accompanying information a number of the consultees indicated they had no objections in principle to the proposal subject to conditions or informatives being attached to any decision should planning permission be granted. They included **Castlereagh Borough Council – Environmental Health Department, NIEA Land and Resource Management Unit, NIEA Water Management Unit, DRD Roads Service, DARD Rivers Agency, Northern Ireland Water and Invest NI.**

The comments of each consultee are summarised below;

Northern Ireland Environment Agency (NIEA) - Land and Resource Management Unit (LRM)

NIEA Land and Resource Management Unit (LRM) in their initial comments indicated that planning approval be withheld pending the submission and agreement of additional information to identify and manage risks including further detail on the previous industrial processes and uses, further site investigations within the factory building, additional information to support a robust risk assessment and further information on the groundwater regime

and on a potential pathway/receptor. LRM also recommended discussion with Castlereagh Borough Council regarding gas risk assessment, gas protection measures and human health risk assessment.

Following consideration of the Phase II Ground Conditions and Contamination Assessment Report and further clarification, LRM stated that they had no further objections to the development subject to the inclusion of specified planning conditions and informatives in any decision to approve.

Northern Ireland Environment Agency (NIEA) – Water Management Unit (WMU)

NIEA Water Management Unit (WMU) commented that the proposed development is associated with land that may have been used previously for industrial/commercial activities which can result in contamination of soils and controlled waters with associated risks to human health and environmental receptors and recommended that the Department determine whether the applicant has considered this aspect and recommended seeking advice from NIEA Land and Resource Management.

NIEA WMU response indicated that a Method of Works statement is required and recommended a number of measures to be incorporated into the development to avoid pollution. The advice and guidance set out in the WMU response would be included as informatives in any decision to approve.

Landscape Architects Section (LAS)

Landscape Architects Section (LAS) commented that there was no objection to the siting of the main elements within the site however indicated that a robust and proportionate landscape framework/structure plan was required. LAS advised that the applicant consider the retention of existing vegetation along the Newtownards Road and Carrowreagh Road frontages and recommended tree planting within the vast expanse of hard surfacing within the car parking areas.

LAS further commented in relation to an objection and indicated that they shared objector's concerns regarding the need to screen and soften the impact of the development and reiterated their initial comments as set out above.

Strategic Planning Division – Design Unit

Design Unit were consulted regarding the application but made no comments regarding the design of the proposal.

Belfast Metropolitan Area Plan Team

Belfast Metropolitan Area Plan Team initially commented that the proposal is contrary to draft BMAP and would raise matters of prematurity and recommended a refusal reason.

BMAP response also indicated that regional planning policy set out in PPS 5 would provide the appropriate policy context for considering the retail element of the proposal.

Following consideration of the amended proposal and an objection to the scheme BMAP re-iterated previous comments indicating that the proposal raised prematurity issues and set out a reason for refusal.

Belfast Planning Area Office

Belfast Area Planning Office were consulted regarding the application but made no comments.

DRD Roads Service

Roads Service initially commented that the Transport Assessment (TA) did not present an accurate or realistic evaluation of potential traffic impacts of the development and offered reasons for refusal.

Following receipt of further information on a number of occasions Roads Service provided a number of detailed technical reviews.

Following receipt of the additional information on 19 April 2012, Roads Service responded on 21 August 2012 and stated they had no objection to this proposal subject to a number of planning conditions relating to access, car parking provision, provision of turning areas and the promotion of alternative modes of transport for the development. Revised conditions were later provided.

DARD Rivers Agency

Rivers Agency indicated that they were not aware of any culverted undesignated watercourses within or in the immediate vicinity of the site and the site does not lie within a fluvial floodplain. Rivers Agency recommended informatics which would be attached to any decision to approve.

Castlereagh Borough Council (CBC)

The Council initially commented that the proposed development will create jobs, particularly part time jobs in an area of high unemployment and will

complement other large stores and smaller shops in the area. There is an opportunity for the developers to take on apprentices to allow local young people to acquire a trade. The area will benefit from regeneration of this derelict site and transport links to the site are well developed.

The Council later commented that its members supported the development and were particularly supportive of the increased number of industrial units as Castlereagh has always had a sound industrial base and they wished to see this continue into the future. CBC welcomed the job creation that the development will bring to the Castlereagh area and the surrounding East Belfast hinterland.

Castlereagh Borough Council - Environmental Health

Castlereagh Borough Council Environmental Health Department (EHD) initially commented that there was no objection in principle however highlighted that the light industrial area is a suitable buffer between the retail store/storage and distribution area and the residential properties to the west of the site. EHD response also stated that the service yard for the retail store has the potential for noise disturbance at residential properties on the opposite side of the Carrowreagh Road. EHD recommended a number of conditions relating to contaminated land and informatives relating to the retail store service yard, contaminated land, the petrol filling station and construction/demolition. Following receipt of the Phase II Ground Conditions and Contamination Assessment Report EHD provided further comments and indicated no Environmental Health objections in principle subject to conditions regarding remediation updating the previous recommended conditions in the initial consultation response.

Following consideration of objections, EHD reiterated that they had no objections in principle subject to compliance with all relevant legislation and subject to conditions and informatives. The response advises that the Council has designated an Air Quality Management Area (AQMA) in Dundonald Village and that it is perceived that there will be an increase in traffic flow through Dundonald Village as a result of the development and therefore EHD request an Air Quality Impact Assessment to be carried out. Other conditions recommended relate to contaminated land, location, layout and equipment for the industrial units, retail store, delivery hours, petrol filling station, noise and dust.

Northern Ireland Water

Northern Ireland Water commented that due to the nature of the proposal the applicant will be required to submit a Pre Development Enquiry form in order to establish if existing public water and sewerage services will be adequate to serve the proposal and equally to assess the impact the proposal will have on the receiving Waste Water Treatment Works.

Following receipt of the Drainage Strategy NI Water commented there is a Public Water Supply and a foul sewer within 20m of the proposal and an existing sewer crosses the site. The response also confirmed that there is available capacity within the receiving Waste Water Treatment Works/Sewer network and reiterated previous comments regarding the requirement for a Pre Development Enquiry.

Invest NI

Invest NI (INI) initially commented that they were opposed to the loss of industrial land currently or last used for industrial purposes. The response also highlighted the potential of the proposed uses to generate employment for the Castlereagh area however indicated that Class B uses are under represented comprising only 30% of the overall application site and such uses present the best opportunity to grow and develop the Northern Ireland economy. INI indicated that a greater emphasis on these uses could help the role of the BMA as the regional economic driver.

INI response noted that the foodstore and petrol filling station were proposed under Phase A of the development and highlighted that the Department should seek to ensure that the industrial elements are secured for the future and brought forward during the early stages of the development.

Invest NI (INI) comments acknowledged the draft Belfast Metropolitan Area Plan zoning of the site as a Major Area of Existing Employment/Industrial land (MCH 09) and indicated that the loss of a significant portion of the site may disproportionately affect the balanced spread of business/industry opportunities across the Castlereagh area as immediately available land for business is limited in the borough.

Following receipt of the amended proposal whereby the hotel element of the was removed and replaced with Class B2 uses, INI acknowledged that the proposed industrial uses now represent approximately 47% of the overall floorspace and stated that the amended proposal has made progress towards the retention of an important industrial resource. INI acknowledged the updated information provided by the applicant, which identified buildings which had become vacant since the original submission and indicated that their availability provides an additional available industrial resource in the area.

INI response raised concerns regarding the potential for precedent and the devaluing of prevailing policy set out in PPS 4 and indicated that the scheme must demonstrate that specific circumstances exist that are not generally applicable.

INI response notes the applicant's proposal regarding an early implementation of the industrial element of the scheme and recommends inclusion of this commitment within any planning permission if granted.

INI's concluded that recognition of the steps taken by the applicant to address earlier concerns and requested commitments by the applicant should be included as planning conditions in any permission to approve.

Northern Ireland Electricity

NIE have no objections to the proposal although they advise that discussion would be required with the developer regarding the adjacent substation and low voltage underground cables before any work starts.

Appendix 2 – Summary of Representations

In total, 7 letters of objection from 5 objectors and 8 letters of support have been received to date. The analysis below describes when these were received and the main points contained therein.

Representations of Objection

1 letter of objection was received from the Northern Ireland Independent Retail Trade Association (NIIRTA). The objection is summarised as follows;

- Application should be accompanied by an Environmental Statement on the basis of traffic impact, noise, loss of amenity, visual impact, contamination and retail impact. Contamination likely from spillages of chemicals and fuel tanks from previous uses. A full risk assessment needs to be undertaken as part of an Environmental Impact Assessment;
- Proposed Sainsbury's superstore is at odds with RDS strategic guidelines and regional context for retailing;
- Proposal will not assist in sustaining Dundonald local centre which has been acknowledged as being fragmented and in need of regeneration.
- Proposal is contrary to the promotion of town centres as major location for new retail developments, does not promote vitality and viability of rural towns and does not enhance local centres;
- Contrary to Belfast Urban Area Plan (BUAP) - operational policy not to permit any new retail development on industrial estates and direct it the city centres or existing shopping centres;
- Dundonald will be completely overwhelmed by such a competing centre. Existing anchor stores are unlikely to survive, will become vacant and the community will no longer be sustained;
- Proposal is contrary to BMAP retail policies R1, R5 and R6 as the scale of the development will prejudice the vitality and viability of BMA town, district and local centres;
- Approval of the proposal would set a precedent and would be prejudicial to the outcome of the BMAP public inquiry;
- Development is contrary to BMAP zoning, would prejudice the plan proposals, lead to a shortage of employment/industrial land and create a precedent for the loss of industrial land;
- Appropriate to refuse planning permission on grounds of prematurity;
- Proposal contrary to PPS5 as it does not comply with paragraphs 39, 41 and 60, will work against regeneration initiatives of Dundonald local centre, will have an adverse effect on the vitality and viability of Dundonald Local Centre, and will act as a direct competitor resulting in its demise due to further fragmentation. The proposal is in an out of centre location and will not complement existing deficiencies in Dundonald but will provide competing facilities and a likely detrimental impact on amenity and traffic movements;
- Proposed superstore is not designed to meet local needs and will prejudice the availability of large modern factory premises;

- Proposal contrary to draft PPS5 as the site is not related in any way to Dundonald local centre and a clear sequential approach of alternative sites has not been demonstrated. Proposal is contrary to Policies RRP3 and RRP6 of draft PPS5;
- Proposal is contrary to Policy AMP3 of PPS 3 in that it will generate a significant amount of additional local traffic onto Upper Newtownards Road and Comber Road which will interfere with the object of the protected routes policy to facilitate through traffic;
- Proposed right hand turning lane will slow down and interrupt the flow of relatively fast through traffic on the dualled protected route and will generate a significant amount of additional local traffic;
- Proposal will conflict with through traffic, will have a profound impact on Upper Newtownards Road and the Comber Road and surrounding junctions, will cause major congestion and will have a detrimental impact on Road Safety
- Proposal will not support sustainable transport choices;
- The existing Carrowreagh Road entrance is totally unsuitable as the main access and will result in traffic backing up at the junction with Newtownards Road. There are also a number of dangerous cross overs on the dual carriageway close to this junction;
- Proposal will result in loss of amenity to the adjacent housing by virtue of noise, nuisance and general disturbance created by service vehicles, security lighting and car parking. The substantial area of car parking without adequate landscaping will further diminish the amenity of the area;
- The proposed superstore would result in a neighbouring use which would be in conflict with the existing housing and the noise, nuisance and general disturbance of a supermarket operating 7 days a week would conflict with the residential use;
- Sea of car parking proposed will result in the loss of amenity to neighbouring residential properties and will detract from one of the main approaches into Belfast;
- The size of this impermeable surface will impact on the surface water run-off and require additional environmental precautions to show how such risks are to be mitigated;
- Proposal contrary to Policy IBD3 of draft PPS4 as it would result in the loss of an existing or storage/distribution use; and
- Site is suitable for modern industrial and distribution purposes in line with the BMAP zoning.

2 letters of objection were received from Pragma Planning on behalf of Ards Shopping Centre and are summarised as follows:

- Retention of some industrial use is a 'veiled attempt' to circumvent the policies of PPS4 in relation to the loss of industrial land;
- Scale of the foodstore would seriously compromise clients existing District Centre (no further explanation provided);
- BMAP raise prematurity issues whilst INI raised concerns about the loss of land in the area as sizeable zoning at Knockbracken would not

be coming forward in the foreseeable future and is located at the western fringe of the District while the application site is located at the eastern fringe of the District;

- Proposal will result in the loss of land or buildings zoned for economic development use in a development plan;
- Application is type of development that Policy PED 7 was brought in to prevent;
- Suggestion by applicant that planning application be determined on the basis of the previous PPS4 and draft PPS 4 is incorrect;
- Applicant's argument that application results in overriding policy or material considerations that outweigh policy Policy PED 7 to justify a decision to the contrary is misplaced and risk setting a dangerous precedent; and
- Policy PED 7 PPS 4 should be given determining weight. Consultation responses of INI and BMAP serve to reinforce this position.

2 letters of objection was received from Fleming Mountstephen Planning on behalf of the Henderson Property Group which are summarised as follows:

- Proposal is contrary to PPS3, PPS4, PPS5, PPS13, Belfast Urban Area Plan 2001 (BUAP) and Draft BMAP;
- PPS 3 – Proposal is contrary to Policy AMP 2 in that it will prejudice road safety and significantly inconvenience the flow of traffic. Proposal is contrary to Policy AMP 7 in that it fails to provide any justification for the reduced level of parking proposed. Proposal is contrary to Policy AMP 6 and General Principle 3 of PPS 12 in that the Transport Assessment is inadequate;
- PPS 4 – Proposal is contrary to PED 7. The Planning Statement addendum states proposal complies with objectives in PPS 4 but fails to note the context within which the objectives are stated. Use of policy objectives to justify proposals which are not consistent with the restructuring of the region's economy is inappropriate. Proposed development is not compliant with PPS4;
- PPS5 - development will not fulfil all the criteria of paragraph 39;
 - turnover figures, trade draw and predicted impact are questionable;
 - proposal fails to complement existing shopping provision, threatens investment in existing centres and will significantly impact on the vitality and viability of existing centres particularly Dundonald;
 - applicant has failed to consider additional floorspace at Ards Shopping Centre and therefore RIA is incomplete; and
 - proposal fails to have regard to the merits of suitable sites in other locations;
- BUAP – proposed development is contrary to the Industrial and Shopping strategies and policies of the BUAP;
- BMAP – proposed development is contrary to draft BMAP zoning MCH 09 and contrary to the retail strategies and policies of BMAP and will

have an unacceptable impact on a wide range of designated town, district and local centres; and

- Precedent of accepting argument that site is unviable and will remain undeveloped would be significant and unacceptable. Such a precedent could be applied to a wide range of land use zonings.

1 letter of objection was received from John and Joyce Morrow which is summarised as follows:

- Concerns regarding highway configuration and road markings and the traffic lighting control system on Carrowreagh Road;
- No road markings on the central reservation of the dual carriageway and difficult and dangerous during peak times to exit Carrowreagh Park and cross the carriageway;
- Length of slip road reduced when traffic light control system was introduced;
- The existing lights control system, road configuration and markings all need to be upgraded and if improvements are not made the junction will become an accident blackspot; and
- Objection to view of large, tall and obtrusive advertising billboards or flashing neon lights.

1 letter of objection was received from Strategic Planning which is summarised as follows:

- Proposal is contrary to key site requirements as set out in Draft BMAP i.e. retail store, petrol filling station and hotel no not comply;
- Loss of existing prime industrial land with the introduction of alternative uses i.e. retail, petrol filling station and hotel;
- Contrary to Draft BMAP Employment Strategy;
- Loss of existing land conflicts with Draft PPS4; and
- Non compliance with Planning (Environmental Impact Assessment) Regulations (NI) 1999 with the absence of an Environmental Statement.

Representations of Support

2 letters of support were received from Castlereagh Borough Council which are summarised as follows:

- Members support the proposal which will create jobs in an area of high unemployment;
- Proposed Sainsbury's store will complement other large stores and smaller shops in the area;
- Opportunity for developers to take on apprentices;
- Area will benefit from regeneration of a derelict site;
- Transport links to site well developed; and

- Council supportive of the increased number of industrial units in the revised scheme as Castlereagh has always had a sound industrial base.

1 letter of support was received from GEMS Northern Ireland which is summarised as follows:

- Support for possibility of jobs for local people in an area blighted by high levels of unemployment.
- If successful GEMS will offer support to the community in terms of training, one to one mentoring and work preparation; and
- GEMS regularly work with key community stakeholders, voluntary/ public sectors agencies and employers to address specific needs of unemployed people.

1 letter of support was received from the Stepping Stone Project which is summarised as follows:

- Have worked recently with Sainsburys on a pre-employment programme for the Dundonald proposal;
- New store will be located within the Carrowreagh Ward which DEL has designated as an area of high unemployment.
- New store and accompanying opportunities for training is a welcome prospect for local people who otherwise are finding it difficult to get work.

1 letter of support was received from Alderman Robin Newtown which is summarised as follows:

- Project will assist with redevelopment of the area;
- Proposal will provide training opportunities with real jobs being available in an area of high unemployment; and
- Proposal will provide an additional shopping facility helping create increased business competition and improving the environment by creating a modern facility in place of long term vacant premises.

1 letter of support was received from Ballybeen Women's Centre which is summarised as follows:

- Proposal extremely positive in providing new jobs and the type of job is suited to their target group;
- Location of Sainsbury's could assist in alleviating needs associated with high levels of unemployment and pockets of deprivation;
- New jobs could provide motivation for those out of work to maintain/regain skills and start new training programmes; and
- Economic benefits will contribute greatly to the development of the local economy and increase optimism in the community.

1 letter of support was received from the Rt Hon Peter D Robinson MLA which is summarised as follows:

- Sainsbury's have worked hard to deliver to meet the demands of planning law.

1 letter of support was received from Castlereagh Enterprises Ltd (CEL) which is summarised as follows:

- Proposal will regenerate a vacant site and will deliver jobs and services of real benefit to the local community;
- Applicants (Lagmar) have committed to long term arrangements with CEL to manage the 20,000sqft of new Class B2 accommodation; and
- Confident that completed units will generate much needed employment.

Appendix 3 – Process History and Planning History

The application for outline planning permission was received on 05 March 2010 accompanied by a Planning statement, Design Concept Statement, Parameters Plans, Retail Statement, Industrial Land Assessment and Phase 1 Desk Study Report (Contamination Assessment). A Drainage Strategy was received on 07 May 2010 and Transport Assessment was received on 04 November 2010.

In addition amendments/further information was received relating to the Transport Assessment, Contamination Assessment, Design Concept Statement, Planning Statement, Parameters Plan, Retail Impact Assessment following receipt of relevant consultations and Departmental requests.

The application was validated on the 10 March 2010 following receipt of a valid P1 form. Neighbours were notified on 23 March 2010 and the application was advertised in the local press on 26 March 2010.

The proposal was considered under Schedule 2 part 10(b) of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 1999 as an urban Development Project, which exceeds the threshold criteria of 0.5 hectares. The Department determined on 12 March 2010 that an Environmental Statement was not required since the application can be processed through the normal development control process and procedures.

Article 31 of the Planning (NI) Order 1991 was applied to the application on 04 May 2010 on the grounds that it would, if permitted:

- Affect the whole of a neighbourhood; and
- Consist of or include the construction, formation, laying out or alteration of a means of access to a trunk road or of any other development of land within 67 metres of the middle of the such a road, or of the nearest part of a special road.

A Phase II Ground Conditions and Contamination Assessment was received on 22 July 2010 and the application was re-advertised on 13 August 2010.

A Transportation Assessment was submitted on 4 November 2010 and the application was re-advertised on 10 December 2010.

The application was amended on 18 July 2011 to omit the hotel element from the proposal in exchange for an additional 2000sqm of light industrial units (Class B2). A revised P1 form was received along with a Development Appraisal and Viability Report, an Economic Impact Study, a Planning Statement Addendum, a revised Parameter Plan booklet and detailed responses to comments made by Roads Service and NIEA Land and Resource Management and the application was advertised on 2 September 2011. Neighbours and representees were notified on 26 August 2011.

Further neighbour notifications were carried out on 16 February 2011 and 2 April 2012.

A Transportation Assessment Addendum and amended plans were received on 19 April 2012. Amended RIA tables were received on 18 April 2012. Neighbours and representees were notified on 23 April 2012 and the application was re-advertised on 11 May 2012.

The application details were the subject of consultation with a range of stakeholders. A number of the consultees and third parties raised concerns about various aspects of the proposal and highlighted the need for additional information in order to fully consider various aspects of the proposed scheme. Representations were also forwarded to consultees for comment where relevant.

Planning history on the site includes two previous applications details of which are set out below:

- Y/2008/0227/F – Application by Lagmar on the same site for a 'Erection of a mixed use development consisting of 72 no. residential units, 6 no. retail units, 48 no. offices, 12 no. industrial units and the erection of a 91 bed hotel all with associated car parking and landscaping, (demolition of all buildings on site). The application was withdrawn on 03 March 2010.
- Y/2005/0392/O – Application by Ravenblack on part of the site (eastern portion) for a Site for mixed use development comprising petrol station with convenience store, 5 no. retail units with 10 no. apartments over, pub/restaurant and 4 no. own door offices at 770 Upper Newtownards Road & Carrowreagh Road. The application was withdrawn on 30 May 2007.

Appendix 4 – Consideration of Retail Impact

Introduction

It should be noted that where no comment has been made in relation to specific aspects of the Retail Impact Assessment (RIA), it should not be construed that the Department has accepted points argued or figures used. The Department do not agree with all of the information, assumptions and estimations presented and made in the RIA submitted in support of this application. In the consideration of the RIA and further information submitted, the Department does not consider it to be wholly accurate.

A Retail Impact Assessment was submitted to the Department on 5 March 2010. Following examination of this RIA, revised tables were submitted on 18 April 2012 by the applicant, at the request of the Department.

The proposed floorspace assessed in this report relates to a total convenience net floorspace of 4110sqm (Sainsburys foodstore of 3980sqm and Petrol Filling Station of 130sqm) and a total comparison net retail floorspace of 2143sqm.

Catchment

The RIA has employed a catchment area based upon a 15 minute drivetime from the application site. The study area is shown as 6 zones in Appendix 1 of the RIA. However an overlay of the 15 minute drive time isochrones is provided in the same Appendix 1 of the RIA.

The Department has used an approximate 0-15 minute drive-time catchment for the proposed foodstore and petrol filling station for both the convenience and comparison floorspace. This will enable a robust assessment.

However, considering the geographic isolation of the Ards Peninsula and its trading patterns, the Department has extended the catchment to include the entirety of the Peninsula. In addition, the Department's adopted catchment extends further north to include Bangor and Groomsport.

The Department's identified 15minute catchment is dissimilar, in parts, with that adopted by the applicant. The Department's 15 drivetime catchment extends into Moneyreagh, Ballygowan and Lisbane. These villages are not included within the 15 minute drivetime identified in the RIA, however they are within the RIA's catchment area. Helens Bay and Crawfordsburn are also included within the Department's 15 minute drivetime but are omitted from the RIA's catchment area. The Department's catchment does not extend into Belfast City Centre, which is included within the 15minute catchment, identified in the RIA.

The map in Appendix 5 illustrates the Department's defined catchment for the proposal.

Base Year & Design Year

The RIA has identified a base year of 2010 (year of submission) and a design year of 2013 based on an opening in 2012. However, given the time taken to consider the proposal, the Department is of the opinion that a base year of 2013 and a design year of 2016 would be more accurate and robust, thus allowing for the submission of a reserved matters planning application, completion of the construction phase and the establishment of a regular trading pattern.

Population

The population figures identified in the RIA differ from those estimated by the Department.

The RIA states that the catchment population figures are based on the 2001 Census provided by Pitney Bowes Business Insight (PPBI), specific to the Study Area and projected by a 0.38% increase per annum. The Department would not concur that a 0.38% per annum population growth rate was agreed with the applicant, as stated under Table 1 of the RIA tables submitted 18 April 2012.

The Department has estimated the catchment population based upon figures sourced from the 2011 Census of Northern Ireland, which have been projected forward using projection rates provided by NISRA in October 2011.

Table 1 (below) identifies the total catchment population estimated by the Department and the applicant in the respective base and design years.

Table 1: Estimation of Catchment Population at Base and Design Years

	Dept	RIA	Dept	RIA
Year	2013	2010	2016	2013
Population	272,643	80,321	277,662	81,240

Expenditure

Available expenditure is divided between convenience and comparison goods and is based upon a figure relating to the amount of available expenditure per head of population for each respective category. The Department's expenditure per head figures (2010 Price Base) are set out in Table 2 (below). These figures have been calculated using The Living Costs and Food Survey – Component Expenditure 2012 (average of 3 years 2009-2011), projected forward using Pitney Bowes Business Insight (PBBI) – Retail Expenditure Guide 2012/13. Figures have subsequently been revised to reflect a 2010 Price Base in accordance with the same publication.

Table 2: Convenience and Comparison Expenditure per Head figures at Base and Design Years

	Base Year (2013)	Design Year (2016)
Convenience	1803.72	1825.45
Comparison	2163.27	2426.37

Using the information above, and having accounted for special forms of trading, the Department estimates that the total available expenditure for convenience goods within the identified catchment area in 2016 amounts to £490.39 million. The total available expenditure for comparison goods in 2016 amounts to £586.80 million.

Table 3: Estimated Total Available Expenditure within catchment at Base and Design Years

	Base Year (2013)	Design Year (2016)
Convenience	£477.76m	£490.39m
Comparison	£526.69m	£586.80m

The Department has estimated a higher total available expenditure (for both convenience and comparison goods) within the catchment area than that specified in the RIA. All monetary figures within the RIA, submitted by the applicant are expressed in a 2008 Price Base, and is therefore different to the price base employed by the Department (2010).

Proposal Turnover

The Department has estimated that the total turnover of the proposal is higher than that specified in the RIA. However it is worthy to note that difference between the Department's and the applicant's turnover of the comparison element of the proposal is £0.64million (see Table 4 below). The Department's convenience estimate has been based on the sales density for Sainsburys as sourced from the Mintel Retail Rankings (2012 Edition). The comparison turnover is based upon the typical sales density for higher end town centre comparison retailing and the mid-point for other high street retailers, as sourced from the Northern Ireland Retail Research Report by Roger Tym and Partners, 2003 and subsequently projected forward to the base and design years.

The RIA states that the trading density of the store is based upon Company average information provided by Verdict's "UK Grocery Retailers 2009", adjusted to 2008 prices. The RIA also states that "as the larger Planning Service net sales figure includes a proportion of space not used for the sale and display of goods the trading density figures have been adjusted down

from company average by 9% to reflect the difference. A further adjustment has been made to reflect Sainsbury's anticipated trading density for a store of this size and density. The RIA states the turnover per sqm is based on Sainsbury's anticipated trading profile for catchment and store size. The RIA does not include the potential turnover of the Petrol Filling Station in its analysis. However the Department has incorporated the proposed PFS net floorspace and potential turnover into its analysis of retail impact, should the application be approved.

Table 4 shows details in regard to the proposal total turnover as estimated by the Department and the applicant. However, the applicant has also adjusted the catchment area's trade draw to 90% of the proposal's total turnover for convenience and comparison elements.

Table 4: Estimated Turnover of Proposal at Design Year

	Depart Design Year at 2016	RIA Design Year at 2013 at 100%	RIA Design Year at 2013 at 90%
Convenience	£47.81m	£28.53m	£25.67m
Comparison	£12.71m	£12.07m	£10.86m
Total	£60.52m	£40.60m	£36.54m

Turnovers of Existing Centres/Provision

The Department has derived its net floorspace figures for existing centres/retail provision from, planning permissions, estimations/observations from site visits, measurements from plans and the RIAs of previously approved applications.

In order to determine average sales densities for existing convenience and comparison retail floorspace within the catchment area, the Department has used a combination of the 2012 Mintel Retail Rankings together with the Northern Ireland Retail Research Report by Roger Tym and Partners, 2003.

Trade Draw and Trade Diversions

In order to make judgements in relation to shopping patterns and the likely amount of trade which will be diverted from existing centres/provision to the proposal, the Department carried out extensive shopper surveys at key locations throughout the catchment. The surveys were carried out at 22 locations on various days, both morning and afternoon in the months of April and May 2013. The Department sought information in regard to where the respondent resided and the preferred location for the respondents convenience, non-bulky and bulky comparison shopping. Trade diversion have been informed by the shopper surveys and applied on the basis that like affects like. The Department in determining its trade draw in addition to other

factors also considered the location of the proposed development, transport links and the scale and format of the proposal.

As such, the Department considers the proposal will draw 97% of its convenience trade and 97% of its comparison trade from the catchment area and 3% its convenience trade and 3% of its comparison trade from outside the catchment area.

The trade draw and market share approach within the RIA, is based on Sainsburys anticipated trading profile. The applicant carried out a Household survey (NEMS) providing information on shopping patterns in the catchment area. The RIA states that the results provide a useful means of identifying the percentage market share of each facility in the area.

With regard to both convenience and comparison elements of the proposal, the RIA takes 10% of trade from outside the catchment area and the remaining 90% from existing centres and stores within the catchment.

The Department does not agree with the levels of trade diversion presented in the RIA or the market share approach outlined in the RIA.

Retail Impact

In its assessment of the proposal, the Department has given consideration to the potential impact of the proposed development upon the following protected centres: Dundonald Local Centre; Ards Town Centre; Bangor Town Centre; Springhill and Bloomfield District Centres; Holywood Town Centre; Comber Town Centre; Donaghadee Town Centre; Connswater and Forestside District Centres; the two local centres in Ards namely, Stratheden Local Centre and Scrabo Local Centre; and Ashbury Local Centre, Bangor.

Convenience Retail Impact

The RIA indicates that 14% of the proposal's turnover will be drawn from the convenience provision within Dundonald Local Centre (including the Lidl, which is now operating as B&M Bargains), resulting in an impact of 13%. The RIA also indicates that 4% of the turnover will be drawn from the Tescos at Connswater, resulting in an impact of 2%. The RIA also indicates that 1.9% of the convenience turnover will be drawn from the Supervalu and Tesco Express in Comber Town Centre resulting in a 4% impact. In terms of Forestside Centre, the RIA indicates that 5.5% of the proposal's convenience turnover will be drawn from Sainsburys and M&S in Forestside Centre, resulting in a 2% impact.

Table 5 below details the Department's assessment of convenience retail impact upon centres/convenience provision within the 0-15 minute drivetime and beyond the 15 minutes drive-time but within the catchment.

The diversion of 55% of the proposal's turnover from Dundonald Local Centre results in an impact of 81%. In regard to the District Centre at Forestside the Department has used a trade diversion of 14%, resulting in a 15% impact.

The diversion of 2.5% of the proposal's turnover from Ards Town Centre results in an impact of 12%.

The level of retail impact estimated upon both Dundonald Local Centre and Forestside District Centre are considered to be detrimental.

See Table 5: Convenience Retail Impact of Proposal.

Comparison Retail Impact

In regard to the comparison element of the proposal and trade diversions from the protected centres, the RIA draws trade from Asda, Dundonald, Connswater Centre, Ards Town Centre, Belfast City Centre and Forestside Shopping Centre. Although comparison turnover is drawn from Belfast City Centre (16.7% of the proposal's comparison turnover) a nil impact is shown on the centre. The RIA indicates that 3.3% of the proposal's comparison turnover will be drawn from Asda, Dundonald, resulting in a 7% impact on the protected centre. It also indicates that 4.9% of the proposal's turnover will be drawn from Connswater Shopping Centre and Retail Park, resulting in an impact of 1%. The RIA indicates that 8.5% of the proposal's comparison turnover will be drawn from Ards Town Centre, resulting in an impact of 2%. The RIA also indicates that 8% of the proposal's comparison turnover will be drawn from Forestside Shopping Centre, resulting in an impact of 1% on the centre.

Table 6 below details the Department's assessment of comparison retail impact upon centres/comparison provision within the 0-15 minute drive-time and beyond the 15 minute drive-time but within the catchment.

Having considered the trade diversion to the current proposal along with the committed developments and associated diversions from existing protected centres, the Department estimates that the proposal would result in cumulative impacts of 94% on Dundonald Local Centre, 48% on Ards Town Centre, 11% on Comber Town Centre, 20% on Holywood Town Centre, 31% on Bloomfield District Centre, 8% on Connswater District Centre, 3% on Forestside District Centre, 50% on Springhill Centre, 38% on Bangor Town Centre and 8% on Donaghadee Town Centre.

See Table 6: Comparison Retail Impact of Proposal.

Appendix 5 – Catchment Map

Appendix 6 – Draft Notice of Opinion

**NOTICE OF OPINION
OUTLINE PLANNING PERMISSION**

Planning (Northern Ireland) Order 1991

Application No: **Y/2010/0087/O**
Date of **05/03/2010**
Application:

Site of Proposed Development: **Lands at the former Rolls Royce factory, Upper Newtownards Road/Carrowreagh Road Dundonald**

Description of Proposal: **Demolition of existing buildings and structures and the construction of a retail store (Class A1); Petrol Filling Station (sui generis); industrial units (Class B2 and B4); and associated highway, footpaths, landscaping and other works and improvements.**

Applicant:	Sainsbury's Supermarket Ltd & Lagmar Properties Ltd.	Agent:	Turley Associates
Address:	C/o Agent	Address:	29-31 Montgomery Street Belfast BT1 4NX

Drawing No: 01

In pursuance of its powers under Article 31(3) of the above mentioned Order, the Department of the Environment HEREBY GIVES NOTICE that outline planning permission for the above-mentioned development in accordance with your application SHOULD IN ITS OPINION BE GRANTED subject to compliance with the following conditions which are imposed for the reasons stated.

1. As required by Article 35 of the Planning (Northern Ireland) Order 1991, application for approval of the reserved matters shall be made to the Department within 3 years of the date on which this permission is granted and the development, hereby permitted, shall be begun by whichever is the later of the following dates:-
 - i. the expiration of 5 years from the date of this permission; or
 - ii. the expiration of 2 years from the date of approval of the last of the reserved matters to be approved.

Reason: Time limit.

2. Approval of the details of the siting, design and external appearance of the buildings, the means of access thereto and the landscaping of the site (hereinafter called "the reserved matters"), shall be obtained from the Department, in writing, before any development is commenced.

Reason: To enable the Department to consider in detail the proposed development of the site.

3. The detailed drawings submitted with the reserved matters application shall be in general accordance with the following parameter plans:
 - Arch 2008-121 DP003 Rev F Development Zones
 - Arch 2008-121 DP004 Rev G Development Footprint
 - Arch 2008-121 DP005 Rev F Access
 - Arch 2008-121 DP006 Rev F Building Heights
 - Arch 2008-121 DP007 Rev D Landscaping Strategy

Reason: To ensure a quality development and an acceptable balance of uses throughout the site.

4. Zones B, C and D as generally defined on Parameter Plan DP003 Rev F shall be reserved for Employment Uses falling within Class B2 and B4 as defined in the Planning (Use Classes) Order (NI) 2004.

Reason: To ensure that a significant portion of the site is retained for employment uses.

5. No less than 1000 sqm of the industrial units permitted within Zone B (Phase B1) shall be completed to a minimum of shell specification along with provision of the access, servicing and car parking for phase B prior to the retail store or petrol filling station being operational. Construction of the remainder of the units within this zone (Phase B2) to a minimum of shell specification shall be commenced no later than 6 months following the freehold or leasehold disposal of 75% of Phase B1 units.

Reason: To ensure the early implementation of economic development uses on site.

6. No development shall commence on site until final details of a Local Employment Partnership delivering recruitment and training initiatives in the locality have been submitted and approved in writing by the Department. The development shall thereafter proceed in accordance with the details of the Partnership.

Reason: To ensure the local economic benefits of the proposed development are realised.

7. The gross retail floorspace of the foodstore hereby approved shall not exceed 9400 sqm and the gross retail floorspace of the petrol filling station

hereby permitted shall not exceed 186 square metres when measured internally.

Reason: To control the nature, range and scale of retailing activity so as not to prejudice the continued vitality and viability of existing retail centres.

8. The net retail floorspace of the foodstore hereby approved shall not exceed 6123 sqm and the net retail floorspace of the petrol filling station hereby approved shall not exceed 130sqm when measured internally.

Reason: To control the nature, range and scale of retailing activity so as not to prejudice the continued vitality and viability of existing retail centres

9. No more than 3980 sqm within the foodstore and 130sqm within the petrol filling station shall be used for the sale and display of convenience goods and no more than 2143 sqm within the foodstore shall be used for the sale and display of non-convenience goods.

Convenience goods for this purpose are hereby defined as:-

- (a) food and drink, including alcoholic drink;
- (b) tobacco, newspapers, magazines, confectionery;
- (c) stationary and paper goods;
- (d) toilet requisites and cosmetics;
- (e) household cleaning materials; and
- (f) other retail goods as may be determined in writing by the Department as generally falling within the category of 'convenience goods' or as generally being appropriate to the trading in these premises.

Reason: To control the nature, range and scale of retailing activity so as not to prejudice the continued vitality and viability of existing retail centres.

10. There shall be no internal operations including the construction of or extension to a mezzanine floor that would result in the increase in the gross or net retail floorspace without the prior written consent of the Department.

Reason: To control the nature, range and scale of retailing activity so as not to prejudice the continued vitality and viability of existing retail centres.

11. The foodstore hereby approved shall not be subdivided into independent or separate retail units without the prior written consent of the Department.

Reason: To control the nature, range and scale of retailing activity so as not to prejudice the continued vitality and viability of existing retail centres.

12. No part of the area indicated for a petrol filling station shall be used for the sale, display or repair of vehicles.

Reason: To ensure the character of the area or the living conditions of adjoining and nearby residents are not harmed.

13. No items for the sale or display of goods shall be sited on the forecourt of the petrol filling station hereby approved.

Reason: In the interests of visual amenity.

14. The petrol filling station shop hereby approved shall each be operated as a single unit and shall not be sub-divided into independent or separate retail units without the prior written consent of the Department.

Reason: To control the nature, size and scale of retailing activity so as not to prejudice the continued vitality and viability of existing retail centres.

15. No development including site clearance works, shall take place until full details of both the hard and soft landscape works have been submitted to and approved in writing by the Department at Reserved Matters stage. The details shall include a detailed layout together with existing and proposed levels, cross sections, hard surface materials, other hard details and all soft landscape details as described below.

The details shall also include detailed planting plans with written planting specification including site preparation and planting methods and detailed plant schedules including the species, the size at time of planting, presentation, location, spacings and numbers.

Reason: To ensure the provision of amenity afforded by an appropriate landscape design.

16. No development shall take place until details of building foundations and the layout, including the positions, dimensions and levels of service trenches, ditches, drains and other excavations on site, insofar as they may affect trees and hedgerows on or adjoining the site, have been submitted to and approved in writing by the Department.

Underground services shall be designed so that they do not pass through any tree protection areas. If running services through tree protection areas is unavoidable, they shall be constructed in accordance with the National Joint Utility Group publication: Volume 4: 'NJUG Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees: Issue 2: 2007 '.

Reason: To ensure the protection of trees and other vegetation to be retained.

17. No part of the development hereby permitted shall become operational or otherwise be occupied until details of the position of accesses onto, and required improvements to, the Upper Newtownards Road / Carrowreagh Road, Ballyoran Lane and the Upper Newtownards Road / Ballyoran

Road junction have been completed in accordance with details submitted to and approved by the Department at Reserved Matters stage, as indicated generally on Layout Drawings No. 9T7165-SK022 and Drawing No. 9T7165-SK023.

All works shall comply with the requirements of the Design Manual for Roads and Bridges and all other relevant standards and technical guidance, including approval of the necessary Departures/ Relaxations from standard.

Reason: To ensure that the road works considered necessary to provide a proper, safe and convenient means of access to the development are carried out.

18. The Private Streets (Northern Ireland) Order 1980 as amended by the Private Streets (Amendment) (Northern Ireland) Order 1992. The Department shall determine, where agreed, for the purpose of adopting private streets as public roads, the width, position and arrangement of the streets associated with the development and the land to be regarded as comprised in those streets.

Reason: To ensure there is a safe and convenient road system within the development and to comply with the provisions of the Private Streets (Northern Ireland) Order 1980.

19. The Private Streets (Northern Ireland) Order 1980 as amended by the Private Streets (Amendment) (Northern Ireland) Order 1992. No other development hereby permitted, shall be commenced or occupied, until the road improvements have been completed in accordance with details submitted to, and approved by, the Department at Reserved Matters stage, as indicated generally on Layout Drawings No. 9T7165-SK022 and Drawing No. 9T7165-SK023..The Department may attach to any determination a requirement under Article 3(4A) of the above Order that such works shall be carried out in accordance with an agreement under Article 3 (4C).

Reason: To ensure that the road works considered necessary to provide a proper, safe and convenient means of access to the development are carried out.

20. The footway on the eastern side of Ballyoran Lane shall be widened to 2.0m and the necessary land will be provided from the western boundary of the applicant's land.

Reason: To ensure there is a satisfactory means of access in the interests of road safety and the convenience of road users.

21. Parking and turning areas shall be provided within the curtilage of the site to the satisfaction of the Department, so that adequate parking is provided for the proposal and that vehicles can enter and leave the site in a forward

gear, the precise no. of which shall be determined at Reserved Matters stage.

Reason: To ensure adequate in curtilage parking and turning in the interests of road safety and the convenience of road users.

22. Details of the location of the Petrol Filling Station shall be agreed at Reserved Matters stage but will be in general accordance with drawing ARCH 2008-121 Option 2 REV E received by the Department as "Design Concept Statement - Addendum", 19/04/2012.

Reason: To ensure there is unimpeded access from the public road in the interests of road safety and the convenience of road users.

23. The development hereby permitted shall not become operational until a Travel Plan to promote alternative modes of transport in accordance with the Transportation Principles has been submitted to, and approved, by the Department at Reserved Matters stage.

Reason: To encourage the use of alternative modes of transport for development users.

24. The development hereby permitted shall not become operational until any highway structure or retaining wall requiring Technical Approval, as specified in the Roads (NI) Order 1993, has been approved and constructed in accordance with BD2 Technical Approval of Highways Structures : Volume 1: Design Manual for Roads and Bridges.

Reason: To ensure that the structure is designed and constructed in accordance with BD2 Technical Approval of Highways Structures: Volume 1: Design Manual for Roads and Bridges.

25. Deliveries to the Food Store, Petrol Filling Station and Industrial Units shall be limited to Mondays to Saturdays 7am to 10pm and Sunday 8am to 6pm.

Reason: To reduce the risk of noise disturbance to neighbouring properties, and in the interest of public health.

26. No development shall commence until a revised risk assessment and detailed remediation strategy has been submitted in writing and agreed with the Department. This shall include:

- a) Further site investigation within the footprint of the former building on site, to include the sampling of soil and groundwater.
- b) A revised risk assessment to include the outcome of the further works in a).
- c) A detailed remediation strategy to address all unacceptable risks including any additional risks identified in b).
- d) Full details of how each of the remedial actions will be verified.

Reason: Protection of health and environmental receptors to ensure the site is suitable for use.

27. The development hereby permitted shall not be occupied until the remediation measures as agreed in condition No. XX have been implemented and carried out in accordance with its terms. Prior to the commencement of the remediation work the Department must be given two weeks written notification, to enable NIEA to visit the site during the works on site.

Reason: Protection of health and environmental receptors to ensure the site is suitable for use.

28. After completing the remediation works under condition Nos. XXX and prior to occupation of the development, a verification report shall be submitted in writing and agreed with the Department. This report should be completed by competent persons in accordance with the Model Procedures for the Management of Land Contamination (CLR11). The verification report should present all the remediation and monitoring works undertaken and demonstrate the effectiveness of the works in managing all the risks and achieving the remedial objectives.

Reason: Protection of health and environmental receptors to ensure the site is suitable for use.

29. If the final building design dictates the requirement for piled foundations, a foundations works risk assessment shall be submitted in writing and agreed with the Department prior to any piling works commencing. The development shall thereafter proceed in accordance with the agreed plan. Reference should be made to Environment Agency guidance, 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention', reference NC/99/73.

Reason: Protection of health and environmental receptors to ensure the site is suitable for use.

30. If during the development works, contamination is encountered which has not previously been identified, works should cease and the Department shall be notified immediately. This new contamination shall be fully investigated in accordance with the Model Procedures for the Management of Land Contamination (CLR11). In the event of unacceptable risks being identified, a remediation strategy shall be agreed with the Department in writing, and subsequently implemented and verified to its satisfaction.

Reason: Protection of health and environmental receptors to ensure the site is suitable for use.

31. A method of works statement and a drainage plan shall be submitted with the application for approval of reserved matters.

Reason: To protect the aquatic environment.

Informatives

1. Details of lighting within the site and proposed advertisements/signage associated with the development should be submitted at Reserved Matters Stage. Details should include the number and positioning of lights and the size and positioning of advertisements/signage.
2. Signs may require separate approval under the Planning (Control of Advertisements) Regulations (NI) 1992. Their size, construction, content and siting should be approved by the Department before any such signs are erected.
3. Details of the proposed retaining wall along Carrowreagh Road should be provided at Reserved Matters Stage. Such details should include the height, design, external appearance and siting of the proposed structure.
4. For the purposes of interpreting the permission:-
 - a. gross floorspace shall be calculated by way of sub internal measurement and shall include any mall, covered entrance lobby, enclosed circulation space, staff accommodation and other ancillary space; and
 - b. gross retail floorspace is floorspace used for selling goods by retail and includes associated storage space but excludes any mall, covered entrance lobby, enclosed circulation space, staff accommodation and any other ancillary space.
5. For the purpose of interpreting the permission, net retail floorspace is the area for the sale and display of goods, check-outs, counters, packing zones, circulation space from check-outs to exit lobby, fitting rooms and information areas. Net retail floorspace shall be calculated by way of internal measurement to the inner face of the wall.
6. The applicant's attention is drawn to:
 - a. the relevant provisions of the Chronically Sick and Disabled Persons (Northern Ireland) Act 1978; and
 - b. the Code of Practice for Access for the Disabled to buildings.
7. The applicant is advised that the internal layout of the proposal should make adequate provision for the needs of people with disabilities. Further advice is set out in Development Control Advice Note "Access for People with Disabilities" available from Divisional Planning Offices.

8. Public water supply available within 20m of the site, consultation with NI Water is required to determine how the proposal can be served. An application to NI Water is required to obtain approval to connect.
9. Foul water sewer available within 20m of the site, consultation with NI Water is required to determine how the proposal can be served.
10. No surface water sewer available within 20m of the site. The applicant may wish to apply to NI Water to requisition a surface water sewer to serve the proposal if it will serve more than 1 property to discharge roof drainage.
11. The applicant is advised that the receiving Waste Water Treatment Works/Sewer Network has available capacity.
12. The applicant is advised that the water requirements for the proposal may be eligible for the provision of a public watermain if it will serve more than 1 property and each property will have an individual supply direct from the proposed public watermain under Article 76 of the above order.
13. The applicant is advised that the sewers within the proposal may be eligible for consideration for adoption under Article 161 of the above order if they meet the criteria as set out in the current Sewers for Adoption specification.
14. The applicant is advised to contact NIW through its Customer Relations Centre on 08457440088 or waterline@niwater.com, to discuss any areas of concern. Application forms and guidance are also available via these means.
15. If, during the course of developing the site, the developer uncovers a pipe not previously evident, NIW should be notified immediately in order that arrangements may be made for investigation and direction in respect of any necessary measures required to deal with the pipe. The applicant is advised to contact NIW Customer Relations Centre on 08458 770002.
16. The applicant is advised that the development requires the installation of a grease trap and an oil/petrol/chemical interceptor.
17. The applicant is advised that an existing sewer crosses the site. No construction, trees planted or other obstruction should be made within 3m (or 1.5 times the depth whichever is greater) of sewers, or 4m (or 1.5 times the depth whichever is greater) of watermains. A diversion may be necessary. Consultation with NI Water is required at an early design stage.
18. Castlereagh Borough Council declared an air quality management area (AQMA) in Dundonald Village in early 2011. An AQMA is an area where the air quality does not meet the objective set by European legislation. In Dundonald Village at Normandy Court flats, Nitrogen Dioxide is above the

objective and therefore the Council had no other alternative but to declare an AQMA. Once an AQMA has been declared, the Council must implement an action plan to reduce the levels below the objective. It is perceived there will be an increase in traffic flow through Dundonald village as a result of this development. The developer should therefore assess the impact of the proposal on air quality and seek ways to reduce the contribution of traffic from the proposal to increased nitrogen dioxide within the AQMA. The developer should contact Castlereagh Borough Council Environmental Health Unit for more information.

19. The location, layout, hours of operation and equipment to be installed on the foodstore and the industrial units e.g. compactors and refrigeration plant should be agreed with the Department and the Environmental Health Department of Castlereagh Borough Council at Reserved Matters stage.
20. A permit under the pollution prevention and control regulations (NI) 2003 must be issued prior to the Petrol Filling Station coming into operation. An application should be made to Castlereagh Borough Council.
21. The layout, traffic flow, refuelling and vapour recovering system associated with the Petrol Filling Station should be submitted and agreed with the Department and Castlereagh Borough Council Environmental Health Unit at Reserved Matters Stage.
22. If a drive through car wash is to be provided at the Petrol Filling Station, the location, design and hours of operation should be submitted and agreed with the Department and the Environmental Health Department of Castlereagh Borough Council at Reserved Matters stage.
23. The developer should carry out works in accordance with BS5228 to minimize disturbance to local residents. There should be no activities likely to cause noise nuisance outside the hours 0800-1800 hrs Monday-Fridays and 0900-1300 hrs Saturdays. There should be no activities likely to cause noise nuisance on Sundays and Bank Holidays to minimise disturbance to local residents. Measures should be put in place to prevent dust and visible particular matter spreading beyond the boundary of the site.
24. The applicant should consult with Environmental Health Service Unit, Castlereagh Borough Council to ensure the layout and design of the food premises complies with relevant food safety legislation.
25. Rivers Agency notes in the Drainage Strategy that part of the site may be serviced by a combined foul and surface water sewer. Should it be considered necessary to separate these, Rivers Agency would require some form of attenuation for the storm flows before they could discharge to the existing watercourse system.

26. Developers should acquaint themselves of their statutory obligations in respect of watercourses as prescribed in the Drainage (Northern Ireland) Order 1973, and consult the Rivers Agency of the Department of Agriculture accordingly on any related matters.
27. Any proposals in connection with the development, either temporary or permanent which involve interference with any watercourse such as diversion, culverting, bridging; building adjacent to, discharging of stormwater to, or placing any form of structure in any watercourse, require the formal written consent of the Rivers Agency. This should be obtained from the Regional Office at Ravernet House, Altona Road, Lisburn, BT27 5QB. Failure to obtain such consent prior to carrying out such proposals is an offence under the Drainage Order which may lead to prosecution or statutory action as provided for.
28. Any proposals in connection with the development, either temporary or permanent which involve additional discharge of storm water to any watercourse require the written consent of the Rivers Agency. Failure to obtain such consent prior to permitting such discharge is an offence under the Drainage Order which may lead to prosecution or statutory action as provided for.
29. If, during the course of developing the site, the developer uncovers a watercourse not previously evident, he should advise the local Rivers Agency office immediately in order that arrangements may be made for investigation and direction in respect of any necessary measures required to deal with the watercourse.
30. The applicant is advised that a Method of Works Statement is required to be submitted and shall include details on how pollution of receiving waterways is to be avoided and how culverts are to be diverted. The Method of Works Statement should also address how it is proposed to mitigate against pollution caused by the internal jetting and cleaning of the culvert, as this activity has the potential to cause pollution downstream.
31. NIEA, Water Management Unit would direct the application to Pollution Prevention Guideline (PPG) 06 – Working at demolition and construction sites, as a baseline for avoiding pollution during the construction phase.
32. <http://www.netregs.gov.uk/netregs/links/107968.aspx>
33. In addition the applicant should comply with all relevant Pollution Prevention Guidelines in order to minimize the impact of the project on the environment, paying particular attention to the following PPGs which can be accessed by visiting the NetRegs website as detailed above:
 - PPG 02 – Above ground oil storage
 - PPG 03 – Use and design of oil separators in surface water drainage systems
 - PPG 05 – Works in, near or liable to affect watercourses

PPG 07 – Refuelling facilities

34. Hard copies of the PPGs are available by visiting the netregs website detailed above or from NIEA WMU upon request.
35. NIEA WMU recommends that any oil tanks serving the development shall be bunded. See PPG 02 as referred to above.
36. Discharge consent under the terms of the Water (Northern Ireland) Order 1999 will be required for the discharge of site drainage from the proposed development. The applicant should be aware that there is no guarantee that discharge consent will be granted, as a number of site specific factors need to be taken into account in assessing the suitability of the proposed means of effluent disposal.
37. The applicant may wish to install an oil interceptor to prevent oil from the proposed petrol station and on site activities entering the water environment.
38. NIEA WMU recommends that no development should take place on site until the method of site drainage disposal has been either agreed in writing with Northern Ireland Water or consent to discharge has been granted.
39. An application form for consent to discharge effluent under the Water (NI) Order 1999 can be obtained by contacting NIEA WMU at the above address, or by visiting the following website:
<http://www.ni-environment.gov.uk/water-home/regulationofdischargesindustrial/industrialandprivatesewage2.htm>
41. NIEA WMU recommends that in order to decrease the risk of incorrect diversion of 'foul' sewage to drains carrying rain/surface water each building shall be provided with such sanitary pipework, foul drainage and rain water drainage as may be necessary for the hygienic and adequate disposal of foul water and rain-water separately from that building. A Water Order Consent is required for any discharges from the pumping station. The drainage system should also be designed to minimize the risk of wrongly connecting the 'foul' sewage system to the rain water drainage system, once the buildings are occupied.
42. NIEA WMU recommends that the buildings associated with this planning application should not be occupied unless the necessary sewerage infrastructure is in place to transfer foul sewage to a Northern Ireland Water Limited (NIW) sewer in an acceptable manner or a private wastewater treatment facility consented by NIEA. It should be noted that NIEA does not favour existing sewerage infrastructure being utilized in such a way as to act as a temporary cesspit.
43. NIEA WMU recommends that the storm drainage of the site should be designed to the principles of Sustainable Drainage Systems (SuDS) in

order to minimize the polluting effects of storm water on waterways and recommend that permeable paving/asphalt should be used on site, where possible.

44. NIEA WMU recommends that the construction of SuDS should comply with the design and construction standards as set out in the CIRIA manual C697.
45. It should be noted that all commercial kitchens should have a properly maintained grease trap on their effluent pipes.
46. Should a sewage pumping station be required the applicant must apply to NIEA WMU for a Water Order (1999) consent for an 'emergency overflow'.
47. Dewatering may be required during the construction and excavation phase of this proposal, depending on the geological settings of these works. If water is encountered, an appropriate abstraction/impoundment licence and consent for discharge may be required from NIEA WMU. Currently such activities fall under the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006 and the Water (Northern Ireland) Order 1999.
48. Consent to discharge under the terms of the Water (Northern Ireland) Order 1999 may be required for the discharge of site drainage during the construction phase of the proposed development. The applicant will need to contact NIEA WMU to obtain the necessary application forms. Alternatively, the applicant may wish to consider the implementation of SuDS (Sustainable Drainage System) to deal with this drainage, as detailed above.
49. The applicant should be aware that a key requirement of the Control of Pollution (Oil Storage) Regulations (NI) 2010 is that oil storage containers must have a secondary containment system (a bund, which is an outer wall or enclosure designed to contain and does not enter the aquatic environment. Guidance on how the Regulations will apply to this development can be found at: <http://www.netregs.gov.uk>.
50. The applicant is advised that it is an offence under the Water (Northern Ireland) Order 1999 to discharge or deposit, whether knowingly or otherwise, any poisonous, noxious or polluting matter so that it enters a waterway or water in any underground strata.
51. The applicant should ensure that measures are in place to prevent pollution of surface or ground water as a result of the activities on site, both during construction and thereafter.
52. The purpose of condition Nos. ~~XX -XX~~ is to ensure that the site risk assessment and remediation work is undertaken to a standard that enables safe development and end-use of the site such that it would not

be determined as contaminated land under the forthcoming Contaminated Land legislation i.e. Part 3 of the Waste and Contaminated Land Order (NI) 1997. It remains the responsibility of the developer to undertake and demonstrate that the works have been effective in managing all risks.

53. The applicant should ensure that the management of all materials onto and off the site are suitably authorized through the Waste Management Regulations (NI) 2006 and/or the Water Order (NI) 1999. This should be demonstrated through a Site Waste Management Plan (see <http://www.netregs.gov.uk>).
54. NIEA Land and Resource Management Unit (LRM) recommend that the applicant consult with NIEA Water Management Unit regarding any potential dewatering that may be required during the redevelopment works including the need for discharge consent. Discharged waters should meet appropriate discharge consent conditions.
55. NIE currently have a large 33/11/.4kV substation, Dundonald East, adjacent to the site. In addition there are also two 11kV and two Low Voltage Underground Cables that traverse the site. Discussion would be required with the developer on these matters before any work commences on site.

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