# LISBURN AND CASTLEREAGH CITY COUNCIL LOCAL DEVELOPMENT PLAN 2032

**Draft Plan Strategy Response** 

**Unicorn Group** 

Lands at The Green, Tullynacross Road, Lisburn.

January 2020



## A Representation to the Lisburn and Castlereagh City Council Draft Plan Strategy (2032)

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## <u>Annexes</u>

**Annex 1 – Site Location Plan** 

Annex 2 – Strategic Employment Land Allocation (Table 5).

Annex 3 – Area Plan Extract BMAP 2015

## 1.0 Introduction

- 1.1 This representation has been prepared by TSA Planning on behalf of our client Unicorn Group, in respect of Lisburn and Castlereagh City Council's published Draft Plan Strategy (DPS) for their Local Development Plan 2032.
- 1.2 Unicorn Group are a manufacturing group based in Lisburn, and own a number of manufacturing companies across multiple industries, distributing products to a range of customers worldwide. The Group is currently going through a continued period of rapid growth; through business acquisitions and increased sales.
- 1.3 Due to the latter, our client acquired the former Coca Cola bottling factory at Tullynacross Road, Lisburn in late 2017, with the intention to bring the factory back into successful operation (see Site Location Plan at Annex 1). The vision for the factory includes plans to re-develop the site into a multi-purpose business, warehousing, and manufacturing campus style business park, and open the site up for rental opportunities to a variety of other businesses.
- 1.4 In light of the above, our client has a keen interest in the DPS; its Economic Vision, Objectives, Strategic Policies and Spatial Strategy. Therefore, the purpose of this representation is to set out how the former Coca Cola bottling factory at Tullynacross Road can help contribute to achieving the economic needs of Lisburn and Castlereagh over the plan period.
- 1.5 To inform this response to the Draft Plan Strategy, consideration is given to the legislative requirements relating to the preparation, form and content of the Local Development Plan set out in the Planning Act (NI) 2011 and The Planning (Local Development Plan) Regulations (NI) 2015. Consideration is also given to the following Policy and Guidance publications, along with the wider content of the Draft Plan Strategy (including accompanying assessments and technical supplements):
  - The Regional Development Strategy (RDS) 2035;
  - The Strategic Planning Policy Statement (SPPS);
  - The Department's Development Plan Practice Notes (DPPN); and in particular:
    - DPPN 6 Soundness; and
    - DPPN 7 The Plan Strategy.
  - Draft Plan Position Paper 3: Employment and Economic Development; and
  - Draft Plan Technical Supplement 3: Employment Land Review (October 2019).
- 1.6 Regard is also had for the Preferred Options Paper stage, the LDP Timetable, and the Council's Community Plan 2017/2032.

- 1.7 The report has been structured as follows: -
- 1.8 Section 2 sets out our consideration of the Strategic Allocation of Employment Land in Chapter 4 of the DPS, its supporting evidence base, and our reasoning as to why we consider the allocation to be unsound in its current form. This section also sets out the steps we believe are necessary to make this element of the DPS sound.
- 1.9 Section 3 sets out our analysis of Employment Lands at The Green, Tullynacross Road, Lisburn and how the site can help make the plan sound at Independent Examination Stage.
- 1.10 **Section 4** sets out our conclusions.
- 1.11 We respectfully request this representation is heard by **oral hearing** at Public Examination Stage.

## 2.0 Strategic Employment Allocation and Supporting Evidence Base.

- 2.1 We consider the Plan Vision and Objectives to be consistent with the RDS (2035) and SPPS (2015) in that the overriding aims of the LDP is to make provision for an ample and adequate supply of employment land in suitable locations to support economic growth and job creation within the Borough.
- 2.2 However, we are concerned that the Strategic Policy SP11 and the associated Strategic Employment Allocation is **unsound** when considered against Soundness Tests **CE1** and **CE2** in that the Policy does not set out a coherent strategy, and it is provided on an incomplete evidence base that does not consider reasonable alternatives; namely the reuse of suitable, unzoned brownfield sites.
- 2.3 The Strategic Employment Land Allocation for Lisburn and Castlereagh over the plan period has been set out under the Strategic Policies and Spatial Strategy in Chapter 4 of the LDP. An extract of the Strategic Employment Allocation can be found below at **TSA 1** and the Land Allocation (Table 5) is at **Annex 2**.

## **Strategic Employment Allocation**

The supply of employment land is identified through a hierarchy of sites which consist of:

- Strategic Mixed Use sites (SMU) Land designated at:
- 1. West Lisburn/Blaris
- 2. Purdysburn/Knockbracken
- Local Employment Sites

The Employment Land Review focused on sites zoned in the existing development plan as the basis for assessment. These existing zonings are carried forward under the transitional arrangements outlined in Chapter 1.

#### TSA 1 – Strategic Employment Allocation Lisburn and Castlereagh

- 2.4 The Strategic Employment Allocation shown above at **TSA 1** has been based on the supporting Employment Land Review (ELR) by Litchfield's Planning Consultancy undertaken between June and August 2019. The review undertook a full Employment Land Evaluation Assessment (ELEF) in line with the RDS 2035. Following this, the approach taken was to carry forward 30No. sites key sites previously zoned in the existing development plan (BMAP 2015) and used these sites as the basis for the allocation.
- 2.5 By way of a brief summary, the ELR identified that there are 5 key areas within Lisburn and Castlereagh for the distribution of Employment Land over the plan period. Within these areas, there is 220 hectares of existing zoned developable land for economic uses. Litchfield's have then used past completion rates as a baseline for generating a forecast need for 44.85ha of developable employment land over the plan period.

- 2.6 To accommodate this need, the supporting text of the Strategic Employment Allocation (SEA) states that the existing 220ha of employment land is more than sufficient for employment purposes over the 15-year plan period.
- 2.7 However, whilst our client does not have any objections per se to any of the identified zonings, we don't believe the approach taken is coherent with the Economic Objectives and Strategic Policy 4 of the DPS.
- 2.8 In light of the above, we believe the employment strategy and proposed employment land allocation is **unsound** in its current form against the following soundness tests:
  - Soundness Test CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow; and
  - 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.

#### **Detailed Assessment**

- 2.9 The ELR and Position Paper 3 identified the following key findings: -
  - There are 365No. premises within Lisburn and Castlereagh that could be classified as general "B Class" employment uses, yet only 30 previously zoned (existing and proposed) employment sites from BMAP 2015 have been subject to a Stage 3 ELEF assessment and have been carried forward to accommodate the employment land requirement over the plan period (i.e. SMUS and LES). The plan does not quantify what the existing unzoned, employment lands contribute to the employment strategy of the Borough.
  - Instead the Strategic Employment Allocation (SEA) is wholly predicated on existing and proposed BMAP zoned lands remaining to be developed in Lisburn and Castlereagh for Employment purposes (the vast majority of which are greenfield, totalling 252.2ha (91.6%).
  - Similarly, the SEA does not take account of the Maize Lands. Whilst there is
    explanatory text set out at in the supporting text of the SEA (page 77), there is no
    corresponding strategic or operational policy for the Maze Site.
  - Position Paper 3 also set out the conclusions of a consultation with key stake holders which identified the following: -
    - Existing employment land is <u>not necessarily in the right locations</u>;
    - More economically viable employment land locations are needed regardless of former zonings;
    - There is a need to increase focus on high technology, renewable engineering and energy uses;

- 4. There is a need for large floorplate offices and land for offices to be ready within a short turnaround time; and
- 5. The distribution and quality of the land supply is to be retained across the Council area. <u>Differing locations will appeal to a range of different businesses and sectors</u>. Connectivity, infrastructure and provision of a high-quality design environment is to be encouraged.
- 2.10 In light of our above key findings, we consider the Council's intention to limit the supply of Employment Land over the plan period to thirty existing zoned Strategic Mixed-Use Sites (SMU) and Local Employment Sites (LES) does not take account of reasonable alternatives, and is inconsistent with the findings of their evidence base. This is not coherent with the objectives and other strategic policies set out within the DPS for the following reasons: -
  - The Council is intending to carry forward 220ha of existing and proposed zoned employment land to accommodate the 44.85ha required over the plan period.
     This is primarily Greenfield which is unsustainable;
  - As the majority of zoned employment lands (i.e. SMUs and LESs) are greenfield
    this contradicts the sustainability objectives of the RDS and SPPS which
    recognises the benefits of <u>re using previously developed land</u>; and
  - No assessment has been given to the sustainability/viability of zoning existing
    unzoned Brownfield sites across Lisburn and Castlereagh for employment uses
    to accommodate the required need. There is potentially several underutilised
    but suitable unzoned sites across the Borough that would meet the sustainable
    employment objectives of the LDP (such as our client's lands at Tullynacross
    Road as set out in Section 3).

#### TSA Proposed Amendments

- 2.11 Having taken the above into account, we consider the Employment Land Allocation is unsound in its current form.
- 2.12 To ensure the Employment Land Allocation is found sound at Independent Examination Stage, we would suggest the following amendments are made: -
  - Review and refine all employment sites (whether zoned or unzoned) to be carried forward and include existing, suitable, unzoned Brownfield sites ahead of new greenfield zoned sites within Lisburn and Castlereagh.
- 2.13 Taking the above into account, and as an example, we would present for consideration our clients lands at The Green, Tullynacross Road for assessment at Local Plan Policies Stage to meet the DPS Employment Land Requirement.

## 3.0 The Green, Tullynacross Road, Lisburn

- 3.1 Whilst we appreciate the actual identification of land use zonings is a matter for Local Plan Policies Stage; we feel it is expedient to make the Council aware at this stage that our client is committed to bringing forward a range of employment uses at this extensive site, which would clearly contribute to the Strategic Employment Allocation at this stage of the plan process.
- 3.2 By way of a brief history, the factory was one of two plants used by the Coca-Cola Hellenic Bottling Company to produce the drink in Ireland, until all production was moved in 2008 to a larger facility on a 45-acre site at Knockmore Hill, Lisburn. Unicorn Group acquired the site in late 2017 and currently occupy part of the premises, along with Flexi-Tile, KME Steelworks. The industrial holding is however underutilised at present.
- 3.3 Due regard should be had that the floorspace within the existing manufacturing premises is available, and this would assist in delivering c.7.11ha (17.57 acres) of the 44.85ha (110.8 acres) of employment floorspace required within Lisburn and Castlereagh over the plan period for multipurpose business uses, warehousing and manufacturing. Uses which were identified during the stakeholder engagement process, as part of the ELR, and those identified as being a priority in the LDP (e.g. high technology, renewable engineering uses, growth, distribution and office workspace) would easily be accommodated at the subject site.
- 3.4 The following sections will identify the merits of taking account of the site within the SEA at Table 5; and subsequently within the defined settlement development limit for Lisburn City, and zoning the site for employment uses at Local Plan Policies stage.

#### Site Context

3.5 The site sits north east of Tullynacross Road; immediately adjacent to the Settlement Limits of Tullynacross and Lisburn City, within the Lagan Valley Regional Park and a Local Landscape Policy Area, and south of the River Lagan. It is contained by a metal security fence; augmented by an abundance of mature planting, with existing residential dwellings along "The Green" towards the site frontage, adjacent to the sites access as shown overleaf at TSA 2.



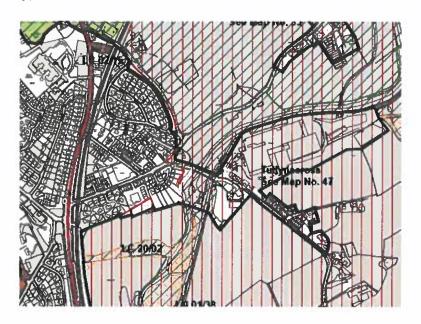
TSA 2 - Site Location in Context

- 3.6 The site benefits from a highly accessible location within the Belfast Metropolitan Urban Area (BMUA), c.1.3 miles to the north of Lisburn City Centre; with excellent connection to the A1 protected road line between Belfast City and Lisburn City (c.0.3 miles) to the west. There are onward connections to the M1 Motorway (Junction 6 c.2.2 miles to the south and Junction 3 c.3.2 miles to the north). Lambeg Train Station is also located c.0.5 miles from the site to the north west, and Hilden Train Station is located c.0.7 miles to the south west.
- 3.7 The site is also immediately adjacent to the Lagan Tow Path, which offers excellent pedestrian and cycling connectivity to the employment lands.
- 3.8 Accordingly, the site is strategically placed in a highly accessible location.

#### Consideration

- 3.9 In light of the Councils emerging Economic Development Strategy and Objectives within the DPS, and local and regional policy direction, significant weight should be given to the overarching principles of sustainable development by bringing brownfield sites such as this former successful industrial/employment factory and site back into use, and recognising its potential to deliver the needs of stakeholders throughout Lisburn and Castlereagh.
- 3.10 Accordingly we would recommend adjusting Table 5 to take account of <a href="mailto:existing unzoned brownfield sites">existing unzoned brownfield sites</a> (such as this site). Whilst this correspondence focuses on our client's lands, it demonstrates that there is a viable alternative, that would assist in the delivery of employment floorspace over the plan period. In addition, such an approach could also ensure such lands contain an active use rather than fall into dereliction. Furthermore, to ensure site potential is maximised, we would recommend both the site and the existing Settlement Development Limit of Tullynacross be brought within the Settlement Development Limit of Lisburn City, and identifying the former Coca Cola factory as a Local Employment Site

suitable for a variety of employment uses. An extract of this can be seen below at **TSA 3** and at **Annex 3**.

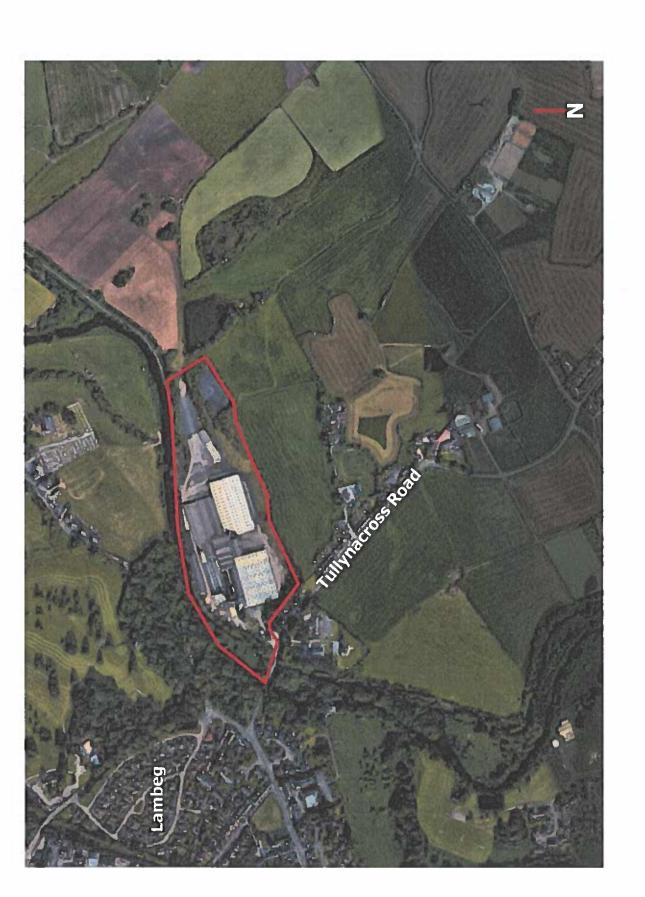


TSA 3 – Proposed extension to the settlement limit of Lisburn

3.11 In addition, the re-use of available floorspace/employment lands is the most efficient and sustainable use of land, and coincides with the results of the stakeholder engagement process supporting the employment land allocation which returned a <u>need for large floorplates for Business Use to be ready within a short turnaround time</u>.

## 4.0 Conclusions

- 4.1 In conclusion, this representation has assessed the published Draft Plan Strategy (DPS) 2032 in respect of its Plan Vision, Economic Objectives, Strategic Policies, Spatial Strategy and Employment Land Allocation; taking into account the tests of soundness set out in Development Plan Practice Note 6 Soundness. The Employment Land Allocation presented in Chapter 4 of the DPS is unsound when assessed against the following tests: -
  - Soundness Test CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow; and
  - 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.
- 4.2 In order to make the Plan Sound, the SEA in Table 5 of SP11 should be adjusted to take account of reasonable alternatives. In this case, rather than just considering existing and proposed employment zonings carried forward from BMAP (2015), due regard should be had to **existing unzoned brownfield sites** which may be underutilised, but suitable for employment uses.
- 4.3 In the interests of the overarching principles of sustainable development, consideration should first be given to existing unzoned Brownfield sites before permitting the zoning of Greenfield lands.
- 4.4 Therefore, we would respectfully request the Council retain **Section 3** of this representation to inform the Local Plan Policies Stage; whereby the identified site would form a natural extension to the settlement limit of Lisburn City; assist in delivering the employment land allocation identified in **Section 2**; and broaden the range and choice of employment land required within Lisburn and Castlereagh over the plan period.
- 4.5 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Draft Plan Strategy.



Drawing Title: Site Location Project: The Green, Tullynacross Road - LCCC DPS Reponse

Date: January 2020

Revision:

Client: Unicorn Group

Drawing No: TSA 2843-001

20 May Street, Belfast. BT1 4NL

ANNEX 2 –
TABLE 5 – STRATEGIC
EMPLOYMENT ALLOCATION

	Area Developed (Ha)
n over Plan Period	Total Area Zoned (Ha)
Allocation over	Location
Strategic Employment Allocation	She Name
Table 5 Str	Site Ref.

Not Started-road only

8.56 23.08

8.59 23.26

0.68 11.56

9.27 34.93

Dundonald Dundonaid

Lands SE of Milmount/ Comber Road

Upper Newtownards Road/ Carnowreagh

Status

Total Area Developable (Ha)

Area Developed (Na)

Total Area Zoned (Ha)

Location

She Name

On-Boing Complete On-going (almost complete)

0.38

0.38

1.62

2.03

Castlereagh Greater Urban Area

Cedarhill Industrial Estate, Beechill Road

0

0

N

~

Castlereagh Gresser Urban Area

Newtownbreds Factory Estate Cedarhurst Road

Suppl-uo Not Started

> 906 5.28

11.29

D.44 0.27 5.1 4.97 3.33

11.74

Carryduff Carryduff

25

Centereugh Greater Urban Area

Forster Green, Saintheid Road

5.55

Lands at Comber Road

Bellynahinch Road

5.1

Carryduff

Cyril Johnston & Co, Selfmeltinch Road

5.28

07

254

On-going Complete

Site Ref.	Stre Name	Location	Total Area Zoned (Ha)	Area Developed (Ha)	Total Area Remaining (Ha)	Total Area Developable (Ha)	Status	She Ref.
RATEGICAL	STRATEGIC MINE DEUGE SITES							MCHOS
-Scot	Blaris Road	Lisbum Oity	119.48	0	60.00	52.49	Not Started	МСНОБ
MCH 13	Exochracten Healthcare Part, Saintfield Road	Caster Uton Ares	25.54	1514	69.72	44.03	Not Started	MCH07
DOMESTING	DOMERNI MENONMENT SITES						The same of the sa	
	Barbour Threads Mill	Lisbum City	5.53	\$2.53	972	2.83	Not Started	MCHOS
DA05**	Used South of Woodwale Development, Ruthfrilland Road	Dromans	354	0	3.54	373	Not Started	MCH12
9007	Knockmore/ Lissue Road	Usburn City	9.09	0	3.09	3.09	Not Started	Š
1001	Lissue Road	Lisbum City	16.34	0	14.34	10.86	Not Started	900
6001	Baltinderry/ Knockmore Road	Lisbum City	44.3	2363	20.67	17.74	On-going	040
0131	Blarts Industrial Escate	Usbum Ony	25.23	24.46	2.28	0.77	On-going (atmost complete)	9040
101	Enterprise Crescent, Ballinderry Road	Lisburn Ony	13.19	13.19	0.73	0	Complete	8050
7131	Ballinderry Road	Lisburn Oty	7.63	7.43	0.18	0	Complete	0710
EC13	Plush Part Industrial Estate, Knockmore Road/ Moirs Road	Usburn City	8.47	491	3.55	3.55	Justino	G 29
1014	Lissue Industrial Estane	Lisbum City	52.82	49.09	8.1	3.73	On-going .	RURAL EMP
SCOS	Coca-Cola Plant, Lissue Road	Lisbum City	18.47	17.3	3.55	117	On-going	1000
MLDS	Seymour Hill Industrial Estate	Usburn Greater Urban Area	10.8	6.07	4.73	4.73	On-going	C801
MLD6	Derriaghy Industrial Estate	Lisbum Greater Urban Area	1511	39.27	5.27	5.27	Buckend	TOTALS

formings. Mixed Use See at What Lichury/Blants with SON of sto for nasidential development denotes mixed use 585.45

Maryland Industrial Estate, Crossnacreevy

Lands at Glenavy Road, Moira

On-going (almost complete)

220.68

237.02

286.95

On-going

11.8 0.11

11.6 0.11

12.26 5.47

24.06

\$58

On-going (almost complete)

0.09 0.47

0.16 0.47

5.13

Campduff

Carryduff Business Part, Comber Road

0

On-going On-going Not Started

1.10 0.76

110

0.79 6.05

1.96 673

Campduff Carryduff

Edgar Industrial Estate

55 50 50

Camyduff

Saintfletd Road Eastbank Road 99.0

6.27

6.27

0

6.27

Glenavy

Land North West of Gobrana Road

Project: The Green, Tullynacross Road - LCCC DPS Reponse

Cilent: Unicom Group

Drawing Title: Table 5 - Strategic Employment Allocation

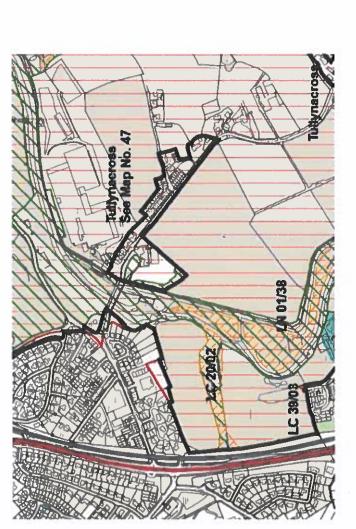
Drawing No: TSA 2843-003

Date: January 2020

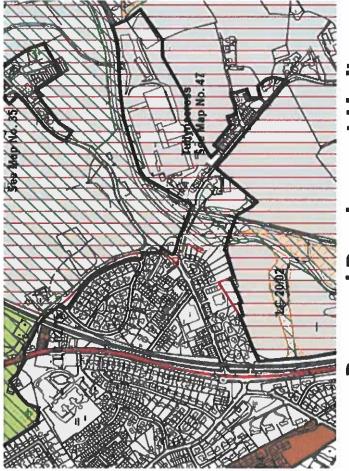
Revision:

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ANNEX 3 AREA PLAN EXTRACT
EXISTING AND PROPOSED







**Proposed Development Limit** 

Project: The Green, Tullynacross Road - LCCC DPS Reponse

Clent: Unicom Group

**Drawing Title:** Existing & Proposed Area Plan Drawing No: TSA 2843-002

Date: January 2020 Revision: