



Fleming Mounstephen Planning
 The Gasworks
 5 Cromac Avenue
 Belfast BT7 2JA
 Northern Ireland

T +44 (0)28 9044 7613

F +44 (0)28 9044 7645

www.lmplanning.co.uk

9th January 2020

Local Development Plan Team
 Civic Headquarters
 Lagan Valley Island
 LISBURN
 BT27 4RL

Dear Sir / Madam

**REPRESENTATION TO THE LISBURN AND CASTLEREAGH CITY COUNCIL LOCAL
 DEVELOPMENT PLAN DRAFT PLAN STRATEGY**

I write on behalf of the Henderson Group in relation to the Lisburn and Castlereagh City Council Local Development Plan (LDP) draft Plan Strategy (dPS).

It is considered that the draft Plan Strategy is Unsound. An oral representation is requested. This representation relates to:

- Part 1 Plan Strategy – Chapter 4C – Growing our City, Town Centres, Retailing and Other Uses; and
- Part 2 Operational Policies – Policy TC6 and the absence of a Policy for neighbourhood shops.

The representation relates to Soundness Tests CE1 and CE2

Chapter 4C

The following extracts from Chapter 4C (and Glossary) are noted:

Plan Objective C *'outlines those actions the Council will adopt to grow our city and town centres, retailing and other uses within the Council area.'* Objective C 3) states that the Council will *'support our towns and villages, encouraging appropriate retailing opportunities.'*

Strategic Policy 14 Town Centres, Retailing and Other Uses states that *'The Plan will support development proposals that promote town centres, retailing and other uses within the City and town*

Registered Office:
 Thompsons Solicitors
 39 Frances Street, Newtownards
 Co Down, BT23 7DW
 Company Number: NI067536

centres to enhance their vitality and viability in accordance with their role and function in the retail hierarchy.'

The Retail Hierarchy is identified as Lisburn City Centre Primary Retail Core and Retail Frontage, Lisburn City Centre, Town Centres – Carryduff, Moira, Hillsborough & Culcavy, District Centre – Forestside and Local Centre – Dundonald, Villages and Small Settlements.

The Glossary defines Local Centre as a *'small groups of shops and offices providing commerce and community services to a local population.'*

Having noted the above extracts, it is noted that Plan Objective C indicates that the Council will grow retailing across the settlements of the Council area. In contrast, Strategic Policy 14 supports retailing in city and town centres only. The Retail Hierarchy identified completely omits any reference to the wide range of local, neighbourhood convenience retailing facilities – which often include other community, office and sui generis uses – which exist across the settlements of the Council area. Furthermore, it is unclear, based on the Council's own definition, how only Dundonald is identified as a Local Centre.

Modern, locally accessible, convenience retailing exists and has a critically important role in community life across Lisburn City, the Greater Urban Areas and towns. Retailing trends towards smaller, more frequent shopping trips over recent years have supported the development of this important aspect of the retail hierarchy. The complete absence of any acknowledgment of this fact in the Plan Strategy is remarkable and a serious omission.

It is considered that

- Strategic Policy 14 should be changed to include support for local, neighbourhood retailing; and
- the Retail Hierarchy should be changed to include reference to local, neighbourhood retailing.

Policy TC6 Petrol Filling Stations and Roadside Service Facilities

There is no explanation or justification provided as to why petrol filling stations must be located on a main trunk road (criteria a) or for the introduction of a needs test (criteria c). These criteria are not appropriate and Policy TC 6 should be amended accordingly.

The acceptability of the location of a petrol filling station, in terms of its relationship to adjacent land uses and its accessibility, can and should be assessed as part of the normal development management process.

Similarly, there is no justification for the introduction of a needs test for petrol filling stations. Such a test discourages investment in new facilities. It protects existing facilities even if they are poor quality and unsuitable in terms of customer needs and expectations and safe operating standards. This is contrary to principles of competition and choice and is not in the public interest.

Policy TC 6 should also be amended in relation to the assessment of the impact of a retail unit associated with a petrol filling station. It is understood that an assessment of need for a retail unit and the impact of a retail unit on defined centres might be required, but no justification is given as to why the impact on *'existing facilities serving a similar function'* outside of a defined centre is required. Such protection discourages investment in new facilities. It protects existing facilities despite potential

poor quality and unsuitability, is contrary to principles of competition and choice and is not in the public interest.

The Absence of a Policy for Local, Neighbourhood Shops

Modern, locally accessible, convenience shopping should be encouraged in the LDP. As noted above, such shops have a critically important place and role in community life across the Council area.

Local convenience shopping supports local suppliers, contributes to local service provision, reduces vehicle trips and establishes more sustainable travel patterns, strengthens local communities, brings life to streets and neighbourhoods, provides local employment (a typical store can provide some 20-30 full and part time jobs) and delivers increased business rates.

The convenience retail sector has experienced significant change in recent years which has led to changes in store formats and layout. People expect and value longer opening hours, a fuller grocery offering and a variety of complementary services e.g. post-office counters, paypoint / utility payment facilities, e-commerce delivery mechanisms, food-to-go counters and solid fuel sales. These factors are often essential for commercial viability and have implications for floorspace within a shop. A modern Spar / Vivo store would be 3,000-4,500 sq. ft. approx. net retail floorspace and a Eurospar / Vivoxtra would be 5,500-6,500 sq. ft. approx. net retail floorspace.

There should be an Operational Policy which supports suitable neighbourhood shops in the Lisburn City, Lisburn and Castlereagh Greater Urban Areas and towns.

Please do not hesitate to contact me if there is anything you wish to discuss in connection with this representation or if you wish to arrange a follow-up meeting.

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