



Local Development Plan 2032
Draft Plan Strategy
Representation Form

Please complete this representation form online and email to LDP@lisburncastlereagh.gov.uk or alternatively print and post a hardcopy to:-

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

All representations must be received no later that 5pm on the 10th January 2020

SECTION A: YOUR DETAILS

Please tick one of the following:-

- Individual
 Planning Consultant / Agent
 Public Sector / Body
 Voluntary / Community Group
 Other

First Name

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

Consent to Publish Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy, however you may opt to have your response published anonymously should you wish.

Even if you opt for your representation to be published anonymously, we still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner appointed to oversee the examination in public into the soundness of the Plan Strategy. This will be done in accordance with the privacy statement detailed in Section C.

- Please publish *without* my identifying information
- Please publish with only my Organisation
- Please publish with my Name and Organisation

SECTION B: YOUR REPRESENTATION

Please set out your comments in full. This will help the independent examiner understand the issues you raise. ***You will only be permitted to submit further additional information to the Independent Examiner if the Independent Examiner invites you to do so.***

What is your view on the Plan Strategy?

- I believe it to be **SOUND**

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below:-

Not Applicable

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

OR

I believe it to be **UNSOUND**

PLAN COMPONENT - To which part of the Plan Strategy does your comment relate?

IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE

Part 1 – Plan Strategy

- Chapter 1 - Introduction
- Chapter 2 - Policy & Spatial Context
- Chapter 3 - Vision & Plan Objectives
- Chapter 4 - Strategic Policies and Spatial Strategy
- Chapter 4A - Enabling Sustainable Communities & Delivery of New Homes
- Chapter 4B - Driving Sustainable Economic Growth
- Chapter 4C - Growing our City, Town Centres, Retailing & Other Uses
- Chapter 4D - Promoting Sustainable Tourism, Open Space, Sport & Outdoor Recreation
- Chapter 4E - Protecting & Enhancing the Historic & Natural Environment
- Chapter 4F - Supporting Sustainable Transport & Other Infrastructure
- Chapter 5 - Monitoring & Review

Part 2 –Operational Policies

- Operational Policy (Please State Individual Policy using Policy Reference e.g. HOU 1) SMU03

SOUNDNESS TEST:

Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at <https://www.planningni.gov.uk/index/s/development-plan-practice-note-06-soundness-version-2-may-2017.pdf>)

- P1 Has the Plan Strategy been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 Has the Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 Did the Council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?
- C1 Did the Council take account of the Regional Development Strategy?
- C2 Did the Council take account of its Community Plan?
- C3 Did the Council take account of policy and guidance issued by the Department?
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
- CE1 Does the Plan Strategy set out a coherent strategy from which its policies & allocations logically flow & where cross boundary issues are relevant it is not in conflict with the Plan Strategies of neighbouring councils?
- CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- CE3 Are there clear mechanisms for implementation and monitoring?
- CE4 Is it reasonably flexible to enable it to deal with changing circumstances?

DETAILS

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

See Attached Sheet.

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

MODIFICATIONS

If you consider the Plan Strategy to be **unsound**, please provide details of what changes you consider necessary to make the Plan Strategy sound.

See Attached Sheet

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

I wish to attach supporting information with my representation e.g. map



IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE

SECTION C: DEALING WITH YOUR REPRESENTATION

Please indicate how you would like your representation to be dealt with.

Written Representation

Oral Representation

Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

SECTION D: DATA PROTECTION

In accordance with the Data Protection Act 2018, Lisburn & Castlereagh City Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the privacy section at www.lisburncastlereagh.gov.uk/information/privacy

By proceeding and signing this representation you confirm that you have read and understand the privacy notice above and give your consent for Lisburn & Castlereagh City Council to hold your personal data for the purposes outlined.

Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the council’s website. Copies of all representations will be provided to DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation. DfI, the Programme Officer and the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation. If you wish to contact the council’s Data Protection Officer, please write to:

Data Protection Officer
Lisburn & Castlereagh City Council,
Civic Headquarters,
Lagan Valley Island,
Lisburn,
BT27 4RL

or send an email to: data.protection@lisburncastlereagh.gov.uk or telephone: 028 9244 7300.

Signature

Date

Lisburn and Castlereagh City Council Local Development Plan

Response to Draft Plan Strategy

Ref: 16/11 (11)(dPS)
Client: Limo Properties Ltd

DETAILS

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

Introduction

1. Our client Limo Properties Ltd owns lands at Sprucefield Regional Shopping Centre. We have made a submission to the Council's Preferred Options Paper (POP) (**Appendix A**) wherein we:
 - a. highlighted our client's land and considered the Council should be promoting more development at Sprucefield;
 - b. supported the development of non bulky comparison goods at Sprucefield and are not opposed to retail and leisure uses at Sprucefield;
 - c. reserved our position in respect of the proposed M1-A1 road link that runs along the east side of Sprucefield;
 - d. noted the potential to relocate the Park and Ride at Sprucefield and would have welcomed more details; and
 - e. highlighted the scope to expand Sprucefield to include additional lands to the south east.

2. We have reviewed the draft Plan Strategy and regrettably we now object to the draft Plan Strategy on the basis as it is unsound for the following reasons:
 - P2 The Council has not taken properly into account representations made at the POP stage. We have requested more detail on issues affecting Sprucefield but details have not been provided;
 - CE2 The Council's policies and allocations are not appropriate having considered the relevant alternatives and are not founded on a robust evidence base;
 - CE4 The draft Plan Strategy lacks flexibility as it is not clear how the Council has determined the scale of retail demand that should be provided at Sprucefield;

PE2

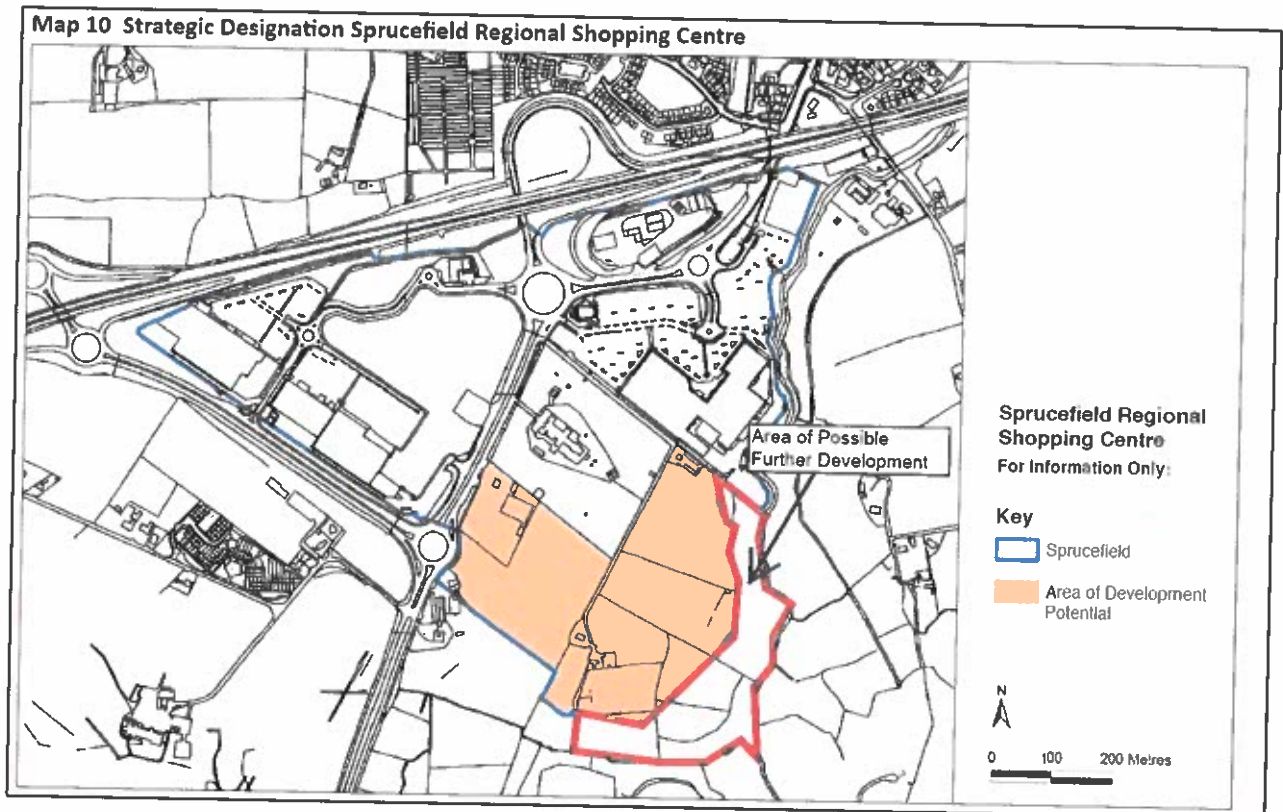
3. The Council have already placed on record its preference to ensure that Sprucefield performs at a level appropriate to its regional status. During the POP stage the Council raised the potential of a new M1-A1 road link running passed Sprucefield and also a potential change in the Park and Ride facilities at Sprucefield. In response to the POP consultation we requested more details about the potential for the M1-A1 link road to be provided, and the potential to locate a park and ride facility to the south of Sprucefield. Neither of these strategic issues have been addressed in any detail in the Plan Strategy. We request further information be provided on these two issues and reserve our right to comment in due course.

CE2

4. Given our clients own lands within the Sprucefield boundary designated at draft Plan Strategy Map 10 (page 105) we support the broad aspirations of the Council as set out at Strategic Policy 14 wherein the Council supports development proposals in Sprucefield provided they comply with the Key Site Requirements.
5. The Key Site Requirements are set out in policy SMU03. We are concerned that "a maximum" of 50,000 sq m of external floorspace will be permitted consisting of up to a maximum of 25,000 sq m external floorspace for retail uses and up to a maximum of 25,000 sq m of external floorspace for leisure and recreation uses, including café/restaurant or tourism uses. We note Key Site Requirement d) includes car showrooms as part of the 25,000 sq m for retail use. We note that the Council are already considering an application for 20,702 sq m retail floorspace and 4,576 sq m of restaurant and hotel uses on lands beside Sainsbury's. This proposal if approved will essentially use up the vast majority of allocated retail floorspace set out in the draft Plan Strategy.
6. While our clients welcome the significant scale of retailing and accompanying uses that the Council are seeking to achieve at Sprucefield, they would be concerned that the imposition of a maximum floorspace cap could result in fettering innovative and significant investment in Sprucefield. It would be our client's strong preference that the Key Site Requirements suggest that the figures proposed are not imposed as maximum levels. Instead, it is our understanding that for a Regional Shopping Centre to properly function at a regional scale it needs a volume of retail floorspace in excess of 50,000 sq m. The Council's reliance on the figures of 50,000 sq m comes from the now cancelled English Planning Policy Statement 6 which found out of centre shopping centres to be generally over 50,000 sq m (draft Plan Strategy page 103). It does not state that Regional Shopping Centres should be up to or at a maximum of 50,000 sq m. Additional floorspace can be provided where there is a need for it and where it complies with the other aspects of policy.

7. We note the requirement for all proposals over 1,000 sq m to provide a Retail Impact Assessment. This is an adequate test to determine whether any future proposals are acceptable or not and would remove any need for the floorspace cap suggested.
 8. Moreover, we note that Council does not rely on this floorspace cap based on the Retail Capacity Study. The Retail Capacity Study commented on scenarios presented to the consultants by the Council. The floorspace figures are not derived from the modelling of the Retail Capacity Study.
 9. As such there is no grounds to impose the arbitrary floorspace figures in policy SMU03 as a 'maximum'. The figures can be included as implying the general scale of retailing that will be appropriate and acceptable, but that these figures can be exceeded.
 10. We also note that there is no policy objection to removing the 'maximum' threshold reference. The draft Plan Strategy notes that Sprucefield is included in the Regional Development Strategy as a regional out of town shopping centre and that there is no consideration of Sprucefield in the Strategic Planning Policy Statement. There is therefore no overarching policy basis to curtail growth of Sprucefield in the manner that SMU03 does.
 11. Considering Map 10 and the area of Development Potential it is clear that there is scope to develop Sprucefield beyond the 50,000 sq m identified in SMU03, and whilst a mix of uses would be involved, it would be inappropriate to impose maximum floorspace caps that could frustrate and deter investment on these lands.
- CE4**
12. The draft Plan Strategy lacks adequate flexibility to accommodate any future investment and development in Sprucefield where a need arises over the Plan period as policy SMU03 unnecessarily imposes an arbitrary maximum floorspace cap on retail and non retail uses.
 13. This reference to a maximum floorspace cap should be deleted to ensure the draft Plan Strategy has flexibility to accommodate future regional investment that requires an out of centre regional shopping centre location.
 14. In addition we note there is scope to extend the boundary of Sprucefield to the southeast of the zoning on Map 10 as shown below. Our clients would welcome this extension as it would add further flexibility should large space users come forward over the Plan period for regionally significant development that cannot be accommodated within the current limit of Sprucefield.

15. This is outlined below.



Further Potential Sprucefield Regional Centre Land

MODIFICATIONS

If you consider the Plan Strategy to be **unsound**, please provide details of what changes you consider necessary to make the Plan Strategy sound.

16. To make the Plan sound it needs to :-

1. Remove reference to the maximum floorspace sizes in policy SMU03 in criteria a) and d).
2. The text at SMU 03 a) could be restated as:
 - i. *"An adequate level of floorspace should be provided to reflect Sprucefield's regional shopping centre status. In the region of 50,000 sq m of external floorspace may be appropriate, however, this can be exceeded should a need be demonstrated. This level of floorspace can be used for retail and non retail uses".*
3. The text at SMU03 d) should state that *"Car showrooms will be permitted as part of the overall floorspace highlighted in criteria a)".*

4. Increase the footprint of Sprucefield's boundary to include additional lands to the south east to allow for future development;
5. Provide more detail on the proposed M1/A1 road link;
6. Provide more detail on the proposals to relocate the Park and Ride facility at Sprucefield.

Appendix

A POP Submission

APPENDIX A

Preferred Options Paper Response Form

Lisburn & Castlereagh City Council has commenced preparation of its first Local Development Plan (LDP). The LDP will be produced in two parts consisting firstly of a Plan Strategy followed by a Local Policies Plan:

- **The Plan Strategy** will set the aims, objectives, growth strategy and strategic policies applicable to the Plan area.
- **The Local Policies Plan** will provide site specific policies and proposals, including settlement limits, land use zonings and environmental designations.

Both documents will guide future growth and development and provide the policy context for the consideration of applications for planning permission.

The Council wants your views on the **Preferred Options Paper (POP)** - the first stage in the preparation of the LDP which will inform the Plan Strategy. All documentation for the POP can be viewed at www.lisburncastlereagh.gov.uk/resident/planning/local-development-plan

The easiest and quickest way to comment is by using the online questionnaire which is available on the Council's website at www.lisburncastlereagh.gov.uk/resident/planning/local-development-plan

Alternatively, please complete and return this questionnaire by email to LDP@lisburncastlereagh.gov.uk or download a copy of this form and post to: **Development Plan Team, Civic Headquarters, Lagan Valley Island, Lisburn, Co. Antrim, BT27 4RL**. Responses must be received no later than **5pm on Thursday 25th May 2017**.

Please note that in order for comments to be considered valid you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. ***Anonymous comments or comments which do not directly relate to the Preferred Options Paper will not be considered as part of the consultation process.***

Comments made on this consultation will be made public, which may include identifying details such as your name or organisation. Should you have any concerns regarding the holding of such information please contact LDP@lisburncastlereagh.gov.uk

Name	
Organisation (if applicable)	Limo Properties Ltd
Address	C/O Inaltus Limited 15 Cleaver Park Belfast
Postcode	BT9 5HX
Email Address	
Telephone Number	

Essential supporting documents such as maps or images may be submitted with this response form and sent to LDP@lisburncastlereagh.gov.uk

Please indicate whether you will be submitting supporting documents.

Yes

No

If you are sending supporting documents, please list the titles of those documents here:

Your comments are sought on the Preferred Options Paper and each of the identified Preferred Options. Please indicate whether you agree with the Council's Preferred Option or one of the alternative options.

These questions are ordered in accordance with the Preferred Options Paper. Please read each section before answering the question. Should you continue on a separate sheet, please number your response in accordance with the relevant Option.

Preferred Options Paper

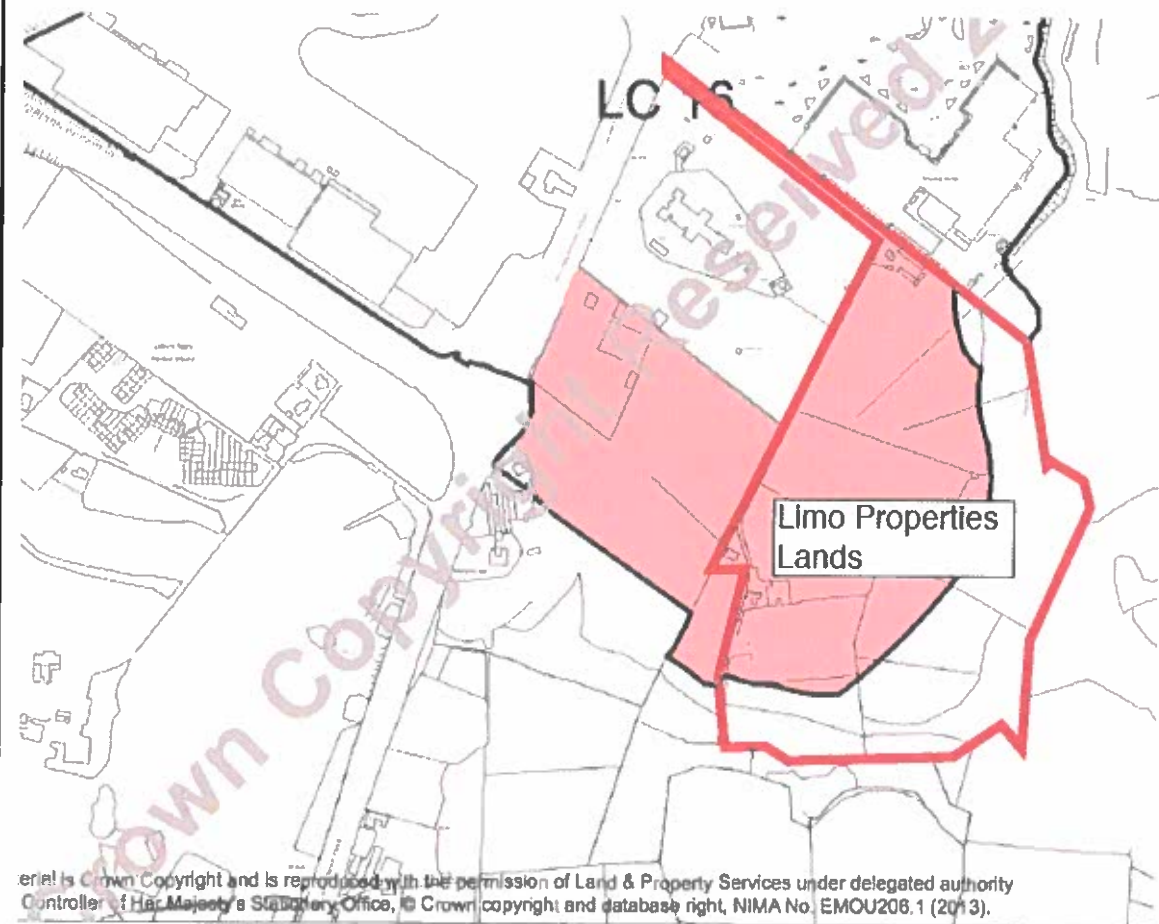
Sections 1-4:

Q1 Do you have any comments on the opening Sections 1-4 of the Preferred Options Paper that should be taken into account when preparing the Plan Strategy?

Make a comment here:

Limo Properties Ltd owns 31.94 acres (12.93ha) of land located at Sprucefield much of which is already within the boundary of Sprucefield as designated in BMAP. The extent of their ownership is outlined below.

In respect of Section 1-4 we consider it would be appropriate to place the retail environment of the area in context in Section 4. The Council's hierarchy includes some of the largest retail centres in Northern Ireland and this should be identified and set out in a policy and geographical context.



Q5 Do you agree with the Strategic objectives (A-F) of the LDP outlined in Section 6?

Yes No

Make a comment here:

Our clients consider Strategic Objective C could be more ambitious. It currently *"supports the role of Sprucefield as a regional retailing destination at a key strategic location within Northern Ireland"*. Our clients consider the Council should *"promote"* and *"take steps to deliver significant regional development at Sprucefield"*. This is consistent with the RDS 2035 which defined Sprucefield as a 'regional out-of-town shopping centre'.

Q18 Key Issue 13: Sprucefield Regional Shopping Centre

(Please refer to Section 7C of the Preferred Options Paper for full details)

Please choose **only one** of the following:

OPTION 13A – PREFERRED OPTION - Retain and reinforce Sprucefield as a Regional Shopping Centre

Option 13B – Retain Sprucefield Regional Shopping Centre but extend uses to include recreation and leisure

Make a comment on your choice here:

Our clients note the Council's comments welcoming the High Court decision of 18th November 2016 lifting the bulky goods restriction at Sprucefield. However, we are also aware that the Court proceedings are ongoing and the matter is still not resolved. Our clients support the case for the lifting of the bulky goods restrictions. Our clients consider that Sprucefield should be permitted unrestricted retailing. In order to allow developments at Sprucefield to come forward, our clients would encourage LCCC to adopt the Local Development Plan (LDP) as soon as possible. An adopted LDP will provide our clients and potential retailers with the certainty needed to make significant investment in Sprucefield.

In relation to the options, we agree generally with the Council approach under option 13A, being that the future policy approach at Sprucefield should reflect the aspiration of the Council to grow Sprucefield. We endorse this approach, particularly if it is linked to our suggested amendment to Strategic Objective C above, as it is consistent with our client's desire for unrestricted retailing at Sprucefield. However, should the Council's aspirations change, we reserve the right to continue to promote unrestricted retailing at our client's lands. That being said we are not opposed to recreation and leisure uses as these can complement the regional shopping centre function.

Q27 Key Issue 22: Retention of Key Transportation Infrastructure Schemes (Road and Rail)

(Please refer to Section 7E of the Preferred Options Paper for full details)

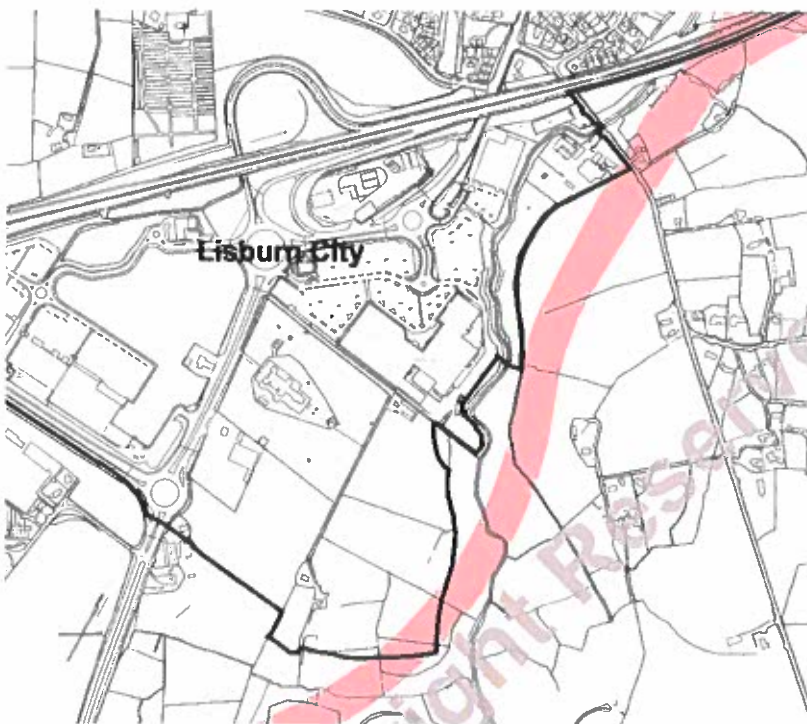
OPTION 22A - PREFERRED OPTION – Retain a number of key transportation infrastructure schemes to enhance accessibility within the area (Roads Option, Rail Option, Disused Rail and Connectivity)

Do you agree with the Preferred Option? Yes No

Make a comment here:

Our clients note there is no alternative options presented on this issue. Our clients also note that there is limited detail in the POP regarding the Strategic Road Scheme of the M1-A1 link (other than Map 26) (page 152). BMAP's protected road line is shown below.

The protected road line runs through our client's land, both zoned Sprucefield land and potential expansion area of Sprucefield. We would object to this as it compromises our client's ability to deliver retailing at Sprucefield and it would compromise our clients land being used for future expansion of Sprucefield. We would welcome opportunity to discuss the matter further with the Council as the Plan moves forward.



Q28 Key Issue 23: Retention of Key Park & Ride Sites

(Please refer to Section 7E of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 23A - PREFERRED OPTION - Retain a number of key Park & Ride Sites with identification of potential new Park & Ride / Park & Share sites**
- Option 23B - Retain a number of key Park & Ride Sites**

Make a comment on your choice here:

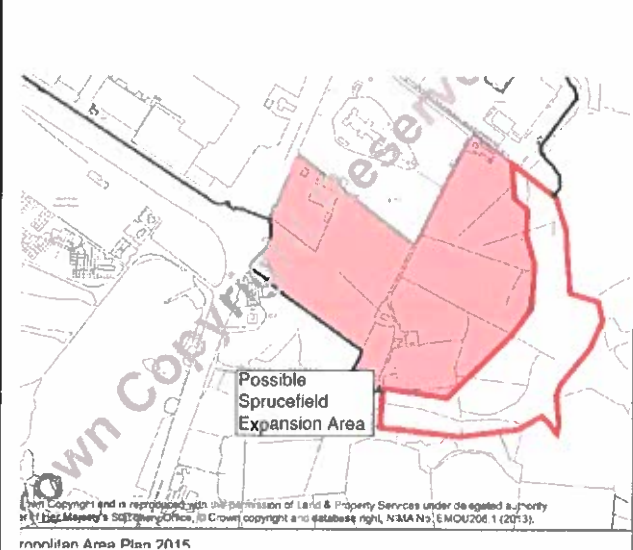
We note the Council's preference to relocate Park and Ride spaces at Sprucefield, but the details of the precise location are not clear. It appears from Map 26 that the proposed Park and Ride may be located to the south of Sprucefield. Our clients reserve their comments on the relocation of the Park and Ride until more details are provided. They would welcome opportunity to discuss this matter in greater detail with the Council in due course.

The Appendices

Q39 Do you have any comments on the remaining appendices?

Yes No

The Appendices provide potential expansion areas for various retail designations, but we note no map is included for Sprucefield. We consider there is scope to expand the designation of Sprucefield to the south east. Our clients own this land and it is shown below.



Thank you for completing this questionnaire. Please ensure that all comments are submitted before the deadline of 5pm on Thursday 25th May 2017