

Place and Economy Department
Planning and Building Control



Belfast
City Council

Principal Planning Officer
Forward Planning Team
Antrim & Newtownabbey Borough Council
Mossley Mill
Carnmoney Road North
Newtownabbey
BT36 5QA

19 September 2019

Dear Ms Mossman,

**ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030
CONSULTATION ON DRAFT PLAN STRATEGY**

I refer to your recent consultation on your new Local Development Plan Draft Plan Strategy (dPS) and thank you for affording Belfast City Council the opportunity to comment on the documents. I can confirm that the City Council has considered the consultation documents and wishes to make the following comments at this time.

The dPS sets out your Council's vision for the Borough and a number of key objectives for the new LDP. These cover a range of issues, including economic development, high quality sustainable design, lands for housing, infrastructure & community requirements, connectivity and environmental protection. These are generally supported.

The Spatial Growth Strategy sets out a proposed hierarchy of retail centres in the Borough, with Antrim town centre and Abbey Centre designated as Tier 1. The current retail catchment for the Abbey Centre extends well into the Belfast City Council area and whilst this is a long-established district centre, any change in the status for this area needs to be carefully managed to ensure the proposed "town centre" role can be developed and managed to ensure the future impact on Belfast City Centre or other retail centres are minimised. Smaller town centres (Tier 2), village/local centres (Tier 3) and neighbourhood centres (Tier 4) are also identified, with a proposal to designate a new district centre at Mossley West.

A Place of Economic Opportunity

Employment

The Council notes your proposal to change the status of Abbey Centre from its current designation as a district centre in draft BMAP 2015 to that of a large "town centre" in the dPS, moving it to Tier 1 in the new retail hierarchy for Antrim and Newtownabbey's council area. From what is proposed it is not clear why the continued designation as a district centre with a tailored policy ANBC could not achieve the same mixed use objectives as those associated with the proposed town centre designation which beyond the name change introduces a very different policy approach to development within the existing and adjacent areas. The change in nature of the centre proposed through the change in designation would require the introduction of a broader range of uses,

Planning and Building Control - Place and Economy Department
Belfast City Council - 9 Adelaide Street, Belfast BT2 8DJ
Tel: 028 9032 0202 Email: planning@belfastcity.gov.uk



**INVESTORS
IN PEOPLE**

enhanced accessibility, remodelling of the area and creating better linkages to achieve the aspiration for a town centre to serve the surrounding residential area.

The Council also notes the recommendations contained in the evidence paper 'Retail and Commercial Leisure' which suggests increasing the range of community functions over time to an approved level that would justify the centres proposed ranking as a Tier 1 centre. It would be more appropriate for these to be prerequisites to any change in status linked to a mechanism within the Development Plan to support and manage the evolution or conversion.

The SPPS put an onus on those developing policies to ensure that there is no unacceptable adverse impact on the vitality and viability of an existing centre within its catchment. Whilst the principle of the designation of a town centre could accord with regional strategic policy set out in the SPPS there is no detail on the potential out workings of this in policy terms arising from the proposed change in designation for such a significant area of existing mixed retail provision. In the absence of linked guidance to manage and deliver the changes (as recommended in the evidence paper) the Council is concerned that given the extent of the defined area, any such designation could have significant adverse impact on the vitality and viability of Belfast city centre and its hierarchy of centres.

The Council therefore considers that a managed masterplan approach or development framework would be best necessary to secure the objective for the transition to a more traditional town centre function, including but not limited to a greater diversity of uses, accessibility, transport, parking management and longer term sustainability appropriate to this designation and role. Whilst the aspiration to secure this change in role and function could be articulated in the Plan Strategy the level of detail and assessment should be set out at the Local Policies Plan stage or through supplementary planning guidance (SPG) once the dPS has been formally adopted. (Additional detail in respect of this issue is set out in the addendum to this letter).

Whilst the principle of the designation of a town centre could accord with regional strategic policy set out in the SPPS there is no detail on the potential out workings or implications of such a designation change in policy terms. In the absence of linked guidance to manage and deliver the changes recommended in the evidence paper the Council is concerned that there is insufficient justification to warrant a boundary designation for 35 hectares to serves a metropolitan area ("town") population of 65,703 without the commitment to greater clarity in respect of the mechanism and process to achieve the transition to the new urban form. It should be recognised that the scale of the change without the clear articulation of detail in respect of the future management is significant when contrasted with the primary retail core for Belfast which has an area of only 31 hectares.

Transport and Infrastructure

The Council welcomes the Strategic Objectives outlined in the Transportation and Infrastructure section: Strategic Objective 1: Promote sustainable growth by managing development and securing new infrastructure provision in our settlements and countryside to meet the needs of all our citizens; and Strategic Objective 6: Improve accessibility, connectivity and ease of movement to, from and within our Borough and promote sustainable travel choices.

Belfast has a major transport challenge due to a large travel to work catchment area and a significant number of commuters using private vehicles to travel. The Council would strongly support the promotion of sustainable transport links with improving access to and from the surrounding towns.

Transportation Schemes SP3.2 / Policy DM 13: Belfast International Airport Operations

The Council would support references in the above policies to promote access to the airport by sustainable modes of transport. In relation to the connectivity to the airport, the Antrim to Knockmore/Lisburn line presents an opportunity to establish a rail link to Belfast International Airport (BIA). This investment is only viewed as economically viable when airport passengers grow to at least 10 million. Passenger throughput in 2017 was just under 6 million. Given the important role of BIA as a gateway into Northern Ireland for tourism and inward investment, the Council would consider that this could be a viable option to consider in the long term.

Policy DM 12: Active travel (Walking and cycling)

The Council welcomes the approach to promote measures in the design and layout of developments that will support increased walking and cycling.

A vibrant and Liveable Place

Land supply and housing growth

The Council note that the housing growth target set out in Strategic Policy 4.2 '*...to facilitate the delivery of at least 9,750 new homes across the Borough over the Plan period 2015 to 2030*', is based on an average of the pre-crash average annual build rate (748 units) and the 2012-2025 HGI annual average build rate (554 units), i.e. 650 units per year. Although this figure exceeds the HGI (17% over), it is acknowledged in Evidence Paper 6: *Housing* that the committed housing supply is already well in excess of the 9,750 dwellings estimated by the Council to meet housing needs over the period 2015-2030.

As identified in Table 6 of the dPS, the Council welcome the Spatial Growth Strategy and the intention to allocate 68% of the proposed growth to Metropolitan Newtownabbey and Antrim. The growth of the Belfast Metropolitan Area is considered important in the context of the RDS objective to provide an appropriate regional economic balance. The Council also notes the significant allocation for Ballyclare and that a substantial proportion of this is comprised of existing committed sites in the town.

A&NBC's response to the Belfast draft Plan Strategy consultation, made reference to Belfast's Housing Technical Supplement and, in particular, the potential to use neighbouring authority lands to meet Belfast's housing needs. The Council acknowledge that Appendix 2 and Table 12 of Evidence Paper 6 illustrate that the realistic unit potential across the Antrim and Newtownabbey Borough is estimated to be in the region of 17,477 units, which is well in excess of the 9,750 units set out in the dPS.

Within this context, the Council also note the assumption at paragraph 7.14 of the dPS that there will only be a minimal requirement for the zoning of additional housing land in the Local Policies Plan.

Affordable Housing

The Council welcomes the objective to provide affordable housing in line with need identified by the NIHE. The intention to bring forward Supplementary Planning Guidance (SPG) to explain in greater detail how the affordable housing will be delivered is also welcomed. The Council would welcome the opportunity to engage further with A&NBC in relation to this future work, given the housing market relationship between the neighbouring authorities.

Accessible housing

'In respect of DM17.1, the Council would raise two issues – firstly, the proposed approach to accessible housing provision differs from Belfast in respect of the thresholds applied, which would necessitate close monitoring of any future market effect and secondly, the Council would point out that meeting Lifetime Homes Standards will not automatically facilitate wheelchair accessibility'.

Strategic Policy 6: Placemaking and Good Design

The council notes the positive approach of this policy.

Planning and Building Control - Place and Economy Department

Belfast City Council

9 Adelaide Street, Belfast BT2 8DJ

Tel: 028 9032 0202

Email: planning@belfastcity.gov.uk

Policy DM25: Urban Design

The council welcomes this policy, however BCC would be concerned that this would represent the full extent of future placemaking and design SPG. The council notes the clear reference between the amplification text and the various strands of policy DM25.

A Place with a Sustainable Future

Homes in the Countryside DM18, 18A, 18B, 18C, 18D, 18E, 18F, 18G, DM19

Welcome this approach which is consistent with provisions of SPPS.

DM23 Protection of Open Space

The Council would like you to note that we recently launched the draft Green and Blue Infrastructure Plan (GBIP) and have written separately to you on this as part of the engagement. The proposed approach to the protection of open space appears to be in line with regional policy and the approach set out in the Belfast Draft Plan Strategy.

Community Greenways

The proposed approach to identify and facilitate the development of community greenways throughout the borough and beyond is supported. These alignments may also encompass linkages into adjoining districts supported through continued consultation and partnership working arrangements and by work on supporting strategies such as the draft GBIP (referred to above). Monsktown to Cavehill Loughshore Park (Jordanstown) to Belfast (Dargan Crescent).

DM 24 Community Facilities

The proposal that decisions will be made in line with regional policy and this will ensure appropriate consideration of any wider regional requirements when making decisions on trans-boundary public utility matters is noted.

Cemetery Provision

The flexible approach to potential provision for cemeteries and crematoria is welcomed in the context of their cross-boundary significance and our ongoing need to explore options (beyond our administrative boundary) to address requirement to serve the needs of residents.

Undeveloped Coast

The proposed approach, which recognises the need to protect the undeveloped coast from inappropriate development is supported. This matter also has potential cross-boundary implications which will continue to be considered through the engagement with adjoining authorities as the plans progress towards detailed designations.

SP8 Natural Heritage and associated DM37 Designated Sites of Nature Conservation Importance and DM38 Protected Species DM 39 Conservation Designations interests

The approach, which is in line with the SPPS and will ensure the protection of important cross-boundary asset such as Belfast Lough is welcomed and this matter should be considered in liaison with adjoining authorities to inform the detailed designation stages.

DM 40 Landscape Protection

Welcome approach to protect important upland hills and mountains for their landmark qualities, their setting and cultural/historical qualities. Recognition of the Belfast Basalt Escarpment and the strong links with adjacent landscapes in neighbouring Councils and Belfast City Council. The importance of including reviews in and out of the area have been considered. Welcome the recognition of the need to protect the landscape qualities and nature conservation attributes of the coastal area of Belfast Lough by protecting the urbanised coastal setting and enhancing the natural environment is welcomed.

The Council also welcomes the policy approach to Trees and Development (**DM42**), Environmental Resilience and Protection (**SP10**), Flood Risk and Environmental Resilience (**SP12, DM46, DM47 & DM49**), Pollution (**DM50**), Major Hazards (**DM51**) and Contaminated lands (**DM52**)

Overall Comment

In the main, the strategic approach and draft plan policies identified do not conflict with the approach, as already set out in our Draft Plan Strategy and supporting documentation. In this regard, it is important that we continue to ensure that the development of our respective policies and actions do not have significantly adversely impacts on the broad objectives and outcomes. The published document is welcomed and supporting information provides a good basis for our continued joint working as our respective LDPS progress.

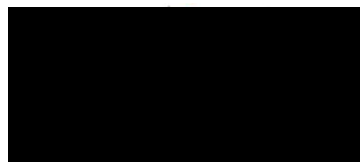
Other issues

Cross-boundary issues, such as sustainable travel, environmental protection, retail growth and waste management, will require continued partnership working. Our position as the regional capital means that there are many linkages and synergies between our new LDP and those of adjoining authorities. There is a need for continued liaison and co-operation between both councils in developing and implementing each new LDP. Continued joint discussion is required throughout all stages of the LDP process to support a coordinated and mutually beneficial approach to strategic and cross boundary issues.

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

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

Yours sincerely



Aidan Thatcher
Director of Planning and Building Control

Planning and Building Control - Place and Economy Department
Belfast City Council
9 Adelaide Street, Belfast BT2 8DJ
Tel: 028 9032 0202
Email: planning@belfastcity.gov.uk

Addendum to Draft Council Response to Antrim and Newtownabbey Borough Councils Local Development Plan Draft Plan Strategy outlining Belfast City Councils concerns regarding the proposed change in the status of the Abbey Centre to a large town centre.

This document provides greater detail on the issues and concerns in respect of the proposed change to the status of the Abbey Centre from a district centre as articulated in draft BMAP 2015 to that of a large "town centre" in the dPS. The proposed change would elevate the centre to Tier 1 in the new retail hierarchy for Antrim and Newtownabbey Borough Council.

The Abbey Centre currently attracts approximately 42% of its comparison good expenditure from Belfast City Council area. (£79.1m of a total of £185m, ANBC Evidence Paper 'Retail and Commercial leisure'). Given this level of trade draw the Abbey Centre is clearly competing with the hierarchy of centres within Belfast district. The statistical data contained within the evidence paper in respect to retail capacity suggest there will be negative residual expenditure of -£69.2m by 2030 taking into account committed turnover for comparison goods. However there appears to be a desire for new business to locate or for existing business to expand in the Abbey Centre as evidenced by the current planning applications to vary conditions of the original permission at Longwood Retail Park in respect to the sale of bulky goods.

It is noted that the recommendations under 'place specific interventions' on page 109 paragraph 6.52 of the evidence paper Retail and Commercial Leisure suggests increasing the range of community functions over time to 'consolidate' the centres proposed ranking as a Tier 1 centre. In many respects traditional town centres have evolved to serve the surrounding community and their diversity of retail and other needs. They generally contain a broad mix of uses and residents tend to make one trip to the town centre for a variety of reasons. The high footfall associated with the linked trips means that all these uses mutually supportive. In addition the town centres are also normally the focus for public transport routes and, whilst they are accessible by car, it is usually necessary to manage car parking through charging as by their very nature the integrated traditional town centres tend to have limited areas of land to devote to free car parks. The more traditional town centres often form the core of a settlement, and many contain heritage assets or conservation area designations.

The Regional Development Strategy 2035 (RDS) recognises the importance of accessible, vibrant city and town centres which offer people more local choice for shopping, social activity and recreation. This is further acknowledged in the SPPS which states that town centres are important hubs for a range of land uses and activities and can have a positive impact on those who live, work and visit them.

The Abbey Centre does not exhibit this diverse mix of uses and attributes of a traditional town centre, being almost exclusively retail in nature. None of the public sector or civic uses which could contribute to a sense of urban place, such as those found in neighbouring towns and cities are currently present. The Centre is only served by one translink route and is not integrated with or easily accessible from the surrounding residential areas by foot or cycle due to the busy road network designed to serve the district centre. The lack of a mix of uses is recognised in the evidence paper where it is stated that *'the Abbey Centre does not have the look or feel of a town centre in the traditional sense of being a meeting place central to a walk-in population'*.

From what is proposed it is not clear why the continued designation as a district centre with a tailored policy approach could not achieve the same mixed use objectives as those associated with the proposed town centre designation, which beyond the name change introduces a potentially very different policy approach to development within the existing and adjacent areas. The change in the nature of the centre proposed through the change in designation would require the introduction of a broader range of uses, enhanced accessibility, remodelling of the area and establishment of linkages to achieve the aspiration for a town centre that would provide a focus for and serve the surrounding residential areas.

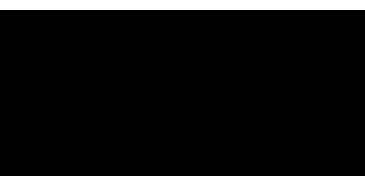
The underlying rationale for the sequential approach as explained in the SPPS, stems from a recognition that traditional town centres find it difficult to compete with out of centre shopping centres. There are many reasons for this, including lack of suitable large sites for modern retailing in traditional town centres and either a lack of provision or more expensive managed car parking arrangements. The Abbey Centre has been designed and evolved as a car orientated district centre based on accessible free car parking provision. It is therefore important to ensure that any proposal to change the status from a district centre to a large town centre is quantified and assessed in terms of its potential impact on the network of centres within its catchment and the potential to achieve a town centre that can be a focus for the urban area.

In the absence of linked guidance to manage and deliver the changes (as recommended in the evidence paper) the Council is concerned that, given the extent of the defined area, any such designation could have significant adverse impact on the vitality and viability of Belfast city centre and its hierarchy of centres. There is the very real danger that any future proposals for retail expansion would not be subject to a sequential approach or any analysis of retail impacts on other centres within the new centres catchment, including Belfast city centre and its hierarchy of centres. Without this detail the proposal cannot provide any certainty as to the deliverability of the objective for a new "town centre" and the impact that such a significant designation would have is contrary to SPG 3 of the Regional Development Strategy (RDS) and paragraph 6.279 of the SPPS.

There are cases where proposals for re-designation similar to that envisaged at the Abbey Centre were subject to judicial review (JR) (Retail Property Holding limited against Renfrewshire Council and the Scottish Minister on 25th June 2015). In this JR the challenge was made to the validity of parts of the Renfrewshire Local Development Plan 2014 and in particular the refusal of Renfrewshire to give effect to modifications recommended by the reporter to remove the designation that listed Braehead as a 'town centre' in terms of the network of 'strategic centres' set out in Schedule 12 in the Glasgow and Clyde Valley Strategic Development Plan 2012 (SDP).

The judge considered that it had not been demonstrated that the reporter had in any respect misconstrued or misunderstood the SDP and that she had supported her conclusions with a careful statement for her reasons as to why Braehead should not be given 'town centre' status, a view shared by other objectors, including other local planning authorities. In summary the reporter concluded that Braehead was not a town centre in the traditional sense and lacked many of the uses associated with a functioning town centre. She also concluded that whilst the town centre status should be removed, she was not against Renfrewshire Council's desire to develop the characteristic of a town centre such as a greater mix of uses, better linkages and greater accessibility.

In this regard whilst the aspiration for the Abbey Centre to evolve to fulfil a more traditional town centre role is recognised it is not clear how this can be achieved at this stage through the proposed simple re-designation without significant risk to other centres.



Aidan Thatcher
Director of Planning and Building Control

Planning and Building Control - Place and Economy Department
Belfast City Council
9 Adelaide Street, Belfast BT2 8DJ
Tel: 028 9032 0202
Email: planning@belfastcity.gov.uk