LA03/DPS/0073

ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030

Draft Plan Strategy Response

The Junction,
Antrim

EPISO 4 Antrim S.à.r.l

September 2019

THE JUNCTION

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TSA PLANNING

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1.0 Introduction

1.1 We write to make representation to the recently published Draft Plan Strategy (DPS) on behalf of our client **EPISO 4 Antrim S.à.r.l.** , owners of **The Junction Retail and Leisure Park** in Antrim.

1.2 The purpose of this representation is to object to the Strategic Retailing Policy **SP 2.12** – Town Centre and Retailing (as contained within **Strategic Policy 1** – Employment); and Development Management Policy **DM 8** – Development at The Junction, Antrim, set out at **Annex 1**.

1.3 We have commissioned Ken Gunn Consulting, a Retail Real Estate Expert and internationally recognised authority on Outlet Centres, to provide detailed analysis on the retail composition of (and relationships between) Antrim Town Centre and The Junction Retail and Leisure Park. Ken Gunn Consulting further interrogates the content of Evidence Paper 4 -Retail and Commercial Leisure, prepared by Nexus Consulting on behalf of the Council, and provides a robust evidence base to challenge the Retail Policies pertaining to The Junction. Ken Gunn Consulting's paper is included at **Annex 2.**

1.4 This evidence challenges the position of Antrim Town Centre in the proposed retail hierarchy by establishing that its scale and function is akin to a Tier 2 – Town Centre role. It is the complementary relationship between the Town Centre and The Junction Retail and Leisure Park that strengthens the retail performance of Antrim. Whilst the intention of the policy being imposed on The Junction is to protect Antrim Town Centre, (rather perversely) the resulting effect is that restrictive policy imposed on The Junction will also undoubtedly weaken Antrim Town Centre.

1.5 As a result of the introduction of onerous restrictions that specifically relate to The Junction and are damaging to its future opportunity, performance and viability, and consequently also that of the Town Centre which it seeks to protect, we believe these policies fail the following Tests of Soundness: -

CE1: The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils

CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base; and

CE4: It is reasonably flexible to enable it to deal with changing circumstances.

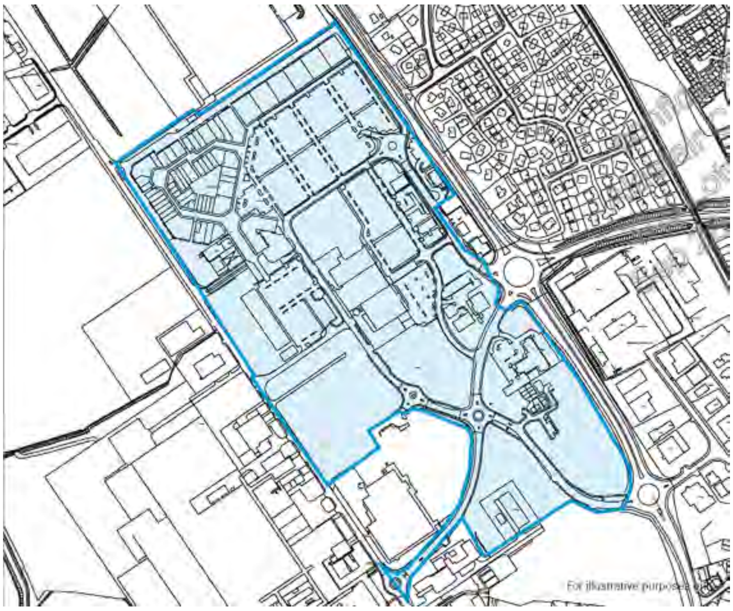
1.6 This objection shall provide a brief overview of The Junction Retail and Leisure Park before setting out our consideration of each of the identified Tests of Soundness which we believe the retailing strategy offends.

1.7 We respectfully request this representation is heard by **Oral Hearing** at Public Inquiry Stage.

2.0 Background - The Junction Retail and Leisure Park

2.1 The Junction One factory outlet centre first opened in 2004, and is developed on a site extending to circa 26.4ha (65.2 acres), comprising several elements, namely; the Outlet Shopping Centre, surrounding Retail/Leisure Parks, Business Park, Hotel, remaining development opportunity sites; and an element of housing land. **TSA 1** below identifies extent of same (for illustrative purposes only). **EPISO 4 Antrim S.à.r.l.** acquired Junction One in May 2016.

TSA 1 –Junction One Site Location



2.2 At the time of acquisition, Junction One comprised a total circa 18,761sqm (201,950sqft) of accommodation, boasting a range of national/multi-national brands/retailers including Adidas, Costa, Bose, Nike, M&S, Gap and Asics. Junction One Factory Outlet Centre offered a range of mid-market and value orientated occupiers. Of this floor space total, circa 17,457 sqm (187,909sqft) were occupied by retail users, and 1,304sqm (14,041sqft) comprised a food and beverage offer. Immediately adjacent to the outlet complex lies the Retail and Leisure Park, comprising circa 15,217 sqm (163,797sqft) of accommodation, of which 1,932sqm (20,796sqft) provides a food and beverage offer. Other operators included Homebase, Lidl, B&M, Omniplex, Brewers Fayre. Other uses included a (closed) adventure golf centre and business units (predominantly vacant but with Leisure Uses approved).

2.3 It was largely recognised that Junction One had historically underperformed, and to some extent gone into decline over the 6 – 7 years prior to our clients purchase.

EPISO 4 Antrim S.à.r.l. acquired Junction One with a significant level of vacancy throughout the Retail and Leisure Park (summarised in **Table 1**), which was set to get worse with long-standing retailers such as Bose, ToyTown and Cooks World having reached the end of their tenancies and deciding to vacate the under-performing Outlet Centre.

Table 1: Tenant Schedule – Retail and Leisure Park

Total No of Units	No of Units Let	No of Units Vacant
Junction One Factory Outlet Centre		
67	**38**	**29**
Junction One Retail and Leisure Park (Excluding Holiday Inn Hotel & ASDA)		
13	**13**	**0**
Business Park		
14	**5**	**9**
Total (including Percentage Ratio)		
94	**56 (60%)**	**38 (40%)**

2.4 The overall legibility of the Retail and Leisure Park was of concern following a detailed review and analysis of the existing environment, and the Outlet Centre suffered from poor public perception.

2.5 In order to address this and arrest the decline of Junction One, **EPISO 4 Antrim S.à.r.l.** has embarked on an ambitious development programme, with an initial investment package of over £25m. To date, within the last 3 years, our client has: -

- Rebranded Junction One to The Junction Retail and Leisure Park;
- Secured Outline Planning Permission (LA03/2017/0234/O) for a comprehensive Masterplan aimed at reconfiguring and regenerating the Factory Outlet Centre and Retail/Leisure Park (see **Annex 3**);
- Regularised the planning position of several longstanding tenants within the FOC and Retail Park;
- Actively managed store closures (M&S, Adidas, Clarks, Bose, Toytown, Bags etc and Brewers Fayre) securing new tenants (Jakes Cocktail Bar, The Entertainer etc);
- Constructed a McDonalds Drive Thru (now operational) at an investment of £2.3m creating 100+ full and part time jobs;
- Currently under construction (due for completion October 2019) a second Drive Thru and Restaurant Parade (to accommodate new tenants Starbucks, Nando's and TGI Fridays) at a cost of £3.45m;
- Commenced works on new car park and spine road configuration with environmental improvement scheme (£2.75m);

- Commenced construction on adjacent residential sites; and
- Accommodated the relocation of the Lidl Supermarket.

2.6 Our client acknowledges and welcomes the declaration by the Local Development Plan at DM 8.1 that the Council will support the ongoing redevelopment at The Junction Retail Outlet and Leisure Park in Antrim in accordance with the terms of the Outline Masterplan approved by the Council.

2.7 There is however understandable concern that the inclusion of onerous and potentially damaging and inflexible policy text will adversely impact future development opportunities for The Junction, and leaving the Retail and Leisure Park unable to keep pace with the changing face of retail which would unpick all recent investment and steps aimed at strengthening its performance.

3.0 Analysis Against Soundness Tests

Elements of Policy that are Considered Unsound

3.1 This section sets out our reasoning as to why we consider elements of the Retail Strategy/Policies within the Draft Plan Strategy to be unsound. When considered against the Coherence and Effectiveness Tests **CE 1, CE2 & CE 4**, it is considered that when read together, the policies identified below are not coherent and in fact appear contradictory. It is clear that there are deficiencies within the evidence base which misrepresent the role of Antrim town centre and the impact of The Junction; and ultimately the restrictive nature of the policies relating to The Junction means that the plan policy is unlikely to be effective if it cannot deal with unexpected or changing circumstances.

Strategic Policy SP2.12

- SP2.12(a) Applying the hierarchy for our Borough's retail centres set out in Table 4 (with Antrim positioned as a Tier 1 Large Town Centre); and
- SP2.12(e) Controlling future retail development at The Junction Retail Outlet and Leisure Park in Antrim in accordance with Policy DM8.

Development Management Policy DM8

DM8.2 In assessing future proposals at or within the environs of The Junction, in addition to the requirements of Policy DM 7, the Council will operate a presumption against development that is likely to impact adversely on the continued vitality and viability of Antrim Town Centre. This includes:

(a) Proposals for additional comparison goods floorspace;
(b) Proposals that seek to vary or remove planning restrictions for bulky goods retail or outlet use to provide unencumbered retail use; and
(c) Proposals for the subdivision of large commercial units into smaller units.

3.2 To properly explore the policy provision against the soundness tests we shall consider the distinct strands of Antrim's place within the retail hierarchy, the restrictive policies against the Junction affecting the ability of the plan policy to adapt to changing circumstances, at a time when the retail sector is undergoing a fundamental restructuring.

SP2.12 (a) - Antrim Town Centre's Place within Retail Hierarchy

3.3 The Local Development Plan proposes Antrim Town Centre as a Tier 1 'Large Town Centre' along with the Abbey Centre in Metropolitan Newtownabbey.

3.4 Taking account of the performance figures expressed in the Nexus Report, Ken Gunn sets out that the annual comparison goods turnover of Antrim Town Centre is about 8% of the Abbey Centre. Furthermore, Antrim Town Centre is not significantly larger [in spatial extent and drive time catchment] than Ballyclare, which is categorised as a Tier 2 Town Centre.

3.5 In this evidential context, it is tabled by the Ken Gunn paper that this raises questions about the credibility of categorising Antrim town centre within the same hierarchical tier as the Abbey Centre.

3.6 From this, Ken Gunn considers that if Antrim town centre is more realistically categorised as a Tier 2 town centre, then a much clearer difference emerges between its everyday community role and the Junctions more occasional, specialty shopping role, suggesting that Antrim town centre and The Junction have a complementary rather than competitive relationship. It is asserted that without The Junction, the status of Antrim as a major retail destination within the shopping hierarchy cannot be justified.

3.7 The Ken Gunn Paper analyses the different roles of The Junction and Antrim Town Centre. It is established that the Junction has an average visitor drive time of 23 minutes which is longer than a typical town centre, creating a sub-regional catchment. It also caters for relatively special shopping needs which are the minority of visitor's shopping trips and not the majority. The Junction "does not satisfy all of the needs of its visitors, all of the time. Opportunities exist for other centres to complement The Junction by satisfying those needs which visitors direct to other centres throughout the year".

3.8 Paragraph 7.9 of the Ken Gunn paper explains that the Retail and Leisure Study suggests The Junction achieves annual comparison goods turnover of £35.4m, 65% greater than Antrim town centre (£21.5m) but just 37% of the turnover attracted to nearby Ballymena town centre (£96.3m) from within the study area. Together, Antrim town centre and The Junction achieve sales of £56.9m which are 60% of the turnover leaking to Ballymena, suggesting that in combination they offer consumers a realistic alternative.

3.9 It is therefore concluded that on its own, Antrim town centre is not strong enough to resist the appeal of Ballymena for the Boroughs residents and planning policy which aims to protect Antrim town centre by restricting development at The Junction is more likely to drive greater leakage to Ballymena than to improve Antrim town centre.

<u>SP2.12(e) & DM8.2 - Policies Restricting Development Opportunity at The Junction</u>

3.10 The Preferred Option Paper set out a single approach to Out of Centre Shopping Areas including The Junction in Paragraphs 4.74 and 4.75 (Page 63); whereby it stated: -

4.74 Our Borough's most prominent out of centre retail locations are sited at Junction Once Retail Outlet and Leisure Park, and outside the current boundary of the Abbey Centre District Centre at Valley Retail Park, Shore Road Retail Park, and at Mill Road, Newtownabbey.

4.75 Given their location beyond our hierarchy of centres, development proposals at these centres will be assessed on their own merits against prevailing policy.

3.11 This approach clearly relates to all of the Out of Centre locations stated in a uniform fashion and applies the 'Town Centre First Approach' advocated by the SPPS, with a sequential test applied to main town centre uses and assessment of retail impact aimed at demonstrating that there will be no unacceptable adverse impact on the vitality and viability of an existing centre within the catchment.

3.12 We would view the above outlined approach at POP stage to be consistent with the SPPS requirements and a sound approach.

3.13 We note the POP Public Consultation Report provides a synopsis of the main comments for out of centre shopping areas were supportive of discouraging edge of and out of town centre retail parks and major shopping centres in favour of fostering the growth of local, sustainable town centres; and there was a call for out-of-town development to be stopped immediately, that focus should be on town and village centres.

3.14 In the consideration of these comments, the plan in line with current regional planning policy recommended a hierarchy of centres, and the policy also details how proposed town centre uses outside the hierarchy of centres are required to demonstrate that a sequential test has been applied.

3.15 It is our contention that this approach is adequately addressed in the LDP Plan Strategy by SP2.12 (with the omission of the specific criterion referencing The Junction); DM 6: Development within Centres; and DM 7: Development outside Centres.

3.16 DM 7 is sufficiently robust in that it must be demonstrated that there will be no significant individual or cumulative adverse effect on the vitality and viability of existing town centres within the catchment.

3.17 Accordingly, Policy DM 8 is unnecessary. Furthermore, the terminology used in DM 8 is clearly confusing and contradictory when one considers that this is further criteria in addition to DM 7 to now state there is a presumption against development "that is *likely* to impact adversely". The term "likely" implies that it is not certain whether there will be an adverse impact, but if DM 7 is satisfied then it stands to reason that there are no adverse impacts on the town centre.

3.18 It is clear that the policy clauses relating to The Junction have been inserted into the Draft Plan Strategy seeking to respond to the concerns expressed by Nexus in the Retailing and Commercial Leisure Study Paper; whereby the Antrim Town Centre Health Check states "the high number of vacancies in Castle Mall speaks to the likely impact of having a large retail park nearby", and concluding that the Council should consider carefully its approach to future retail and leisure provision at The Junction, in that it will be important to ensure that the 2 locations are distinguishable in terms of their offer as both have a broadly similar market share (Para 6.42).

3.19 When considering the content of the evidence paper insofar as it relates to The Junction, there is nothing which suggests the need for a different policy approach to that covering the other out of centre locations. The perceived impacts and influence of The Junction on the Town Centre appear to have been unfairly tainted by the assumptions made by Nexus surrounding the vacancy rates of the Castle Mall.

3.20 The Ken Gunn paper delves deeper into the circumstances surrounding the vacancy of Castle Mall. Ken Gunn states that this 'competitive' view overlooks the main structural changes which have and continue to affect retailing, the impact of these changes on the hierarchy of retail centres, the poor financial health of retail businesses and the inability of landlords to adapt to the changing commercial value of retail locations due to high debt leverage and falling rental incomes.

3.21 It is further set out in Para 7.6 of Ken Gunn's report that "It is interesting to note that the vacancy in Antrim town centre is entirely located within Castle Mall. This is unusual as towns which have been impacted by out of town competition normally suffer high vacancy along unmanaged secondary streets, rather than managed shopping centres. Antrim's situation suggests that the town's smaller landlords have better adapted to the changing economic climate and that the vacancy in Castle Mall is a chronic, legacy condition which can only be alleviated by a change in property valuation, (possibly) ownership and the enforced or voluntary transition of the centre to a more sustainable role".

3.22 The case has been made that the role The Junction has to the Town Centre is complementary and elevates the status of Antrim within the retail hierarchy by improving its overall performance against other competing centres such as Ballymena. The Junction has the potential to capture investment for Antrim which is not capable of being accommodated within the Town Centre and the recent and effective investment by EPISO 4 Antrim S.à.r.l. has helped reverse the fortunes of The Junction to a certain extent as it faces up to the challenges of a restructuring of the retail market consisting of changing demographics, generational attitudes, new technologies and globalisation creating a consumer paradigm, as described in the Ken Gunn paper.

3.23 Challenges presently facing The Junction in today's retail climate includes multiple brands entering administration and few new entrants into the market to backfill. Footfall and spend is currently down across all shopping centres with the British Retail Consortium confirming June and July were the worst on record.

3.24 The Junction is likely to face many challenging market conditions over the course of the next plan period, without adding an additional layer of restrictions outside of the normal out of centre policy considerations. A point that is emphasised is that a weak Junction Retail and Leisure Park further weakens the Town Centre, and this means that the Plan's strategic objectives are not met. It is recognised that the Council will adopt a programme of monitoring and review the LDP, however, the damage done by these policies could result in irreversible damage by that stage as the policy as drafted is not reasonably flexible to quickly adapt to changing circumstances.

4.0 Conclusion

4.1 This representation is submitted to Antrim & Newtownabbey Borough Council on behalf of **EPISO 4 Antrim S.à.r.l.** in response to the retailing strategy and proposals relating to The Junction Retail and Leisure Park in the recently published Draft Plan Strategy.

4.2 Our client has injected over £25m so far into transforming the fortunes of the Junction Retail and Leisure Park following its acquisition in 2016. Prior to then, the Centre had suffered from lack of investment and trading conditions were challenging. The retailing industry, as a whole, is challenging and the imposition of additional criteria and specific policy proposal treating The Junction differently to other Out of Centre locations is considered likely to have a detrimental effect not only on the Junction but also Antrim Town centre, the protection of which is the reason for considering additional policy in the first instance.

4.3 This restrictive policy context however arises from poor evidence as to the reasons for the high vacancy exhibited in the Castle Mall shopping centre and lack of proper understanding of the role that the Junction plays in complementing Antrim Town Centre and strengthening the town as a Retail Destination and elevating its status in the Retail Hierarchy.

4.4 It is considered to offend the Coherence and Effectiveness Tests CE 1, CE2 and CE4. The Out of Centre policy DM 7 is considered sufficiently robust to protect the performance of Antrim Town Centre against inappropriate Out of Centre proposals, and in order to make the Retail Strategy sound, it is recommended that the additional policy criteria relating to The Junction is deleted from the Plan; i.e. SP2.12(e) and DM 8.

4.5 Whilst this evidence paper has drawn parallels between the size and scale of Antrim Town Centre being more akin to a Tier 2 centre (such as Ballyclare), we consider it can and should perform as a Tier 1 centre with the benefits of a strong Junction Retail and Leisure Park.

4.6 We trust the above is of assistance to the Council and will positively inform the Local Development Plan 2030 process. We reserve the right to submit further representations as and when necessary throughout the Local Development Plan 2030 process on behalf of our client.

Annex 1 – Retail Policy Extract

Belfast International Airport SEL

SP 2.8 Until such time as the boundary of the SEL at BIA is identified, the Council will operate a presumption in favour of a wide range of industrial, business, airport related and other complementary employment and service uses on the lands currently zoned at this location for airport related use. In addition, the Council will, in principle, support development at BIA that accords with or complements the published Airport Masterplan 2030.

Local Employment Sites

SP 2.9 In addition to SELs the Council will, where appropriate, identify other established industrial and business areas in Metropolitan Newtownabbey and our Borough's towns as Local Employment Sites. The location and precise boundaries of these sites will be brought forward in the Local Policies Plan.

SP 2.10 Whilst these sites will continue to facilitate current local employment needs and be safeguarded for such use, it is recognised that there may be potential for mixed-use redevelopment schemes to deliver local community and employment benefits in the future.

Agricultural Sector

SP 2.11 The Council will support the ongoing operational needs of our Borough's agricultural sector and facilitate appropriate farm diversification schemes.

Town Centres and Retailing

SP 2.12 The Council will operate a town centre first approach in considering the development of retail and other main town centre uses across our Borough. This will be achieved by:

(a) Applying the hierarchy for our Borough's retail centres set out in Table 4;

(b) Promoting and supporting our Borough's town centres as the preferred locations for the development of retail, leisure (including evening/night-time economy uses), office, visitor accommodation, and appropriate housing and community facilities recognising the complementary role of our Borough's district and local centres;

(c) Ensuring all development proposals for retail and other main town centre uses are of a scale and type that are commensurate with the centre's size and function within the retail hierarchy;

(d) Applying a sequential test as set out in Policy DM 7 to all development proposals for main town centre uses that are not within an existing centre; and

(e) Controlling future retail development at The Junction Retail Outlet and Leisure Park in Antrim in accordance with Policy DM 8.

Large Town Centres	Abbey Centre and Antrim
Town Centres	Ballyclare, Crumlin, Glengormley, and Randalstown
District Centres	Northcott and Whiteabbey Village
Local Centres	**Urban** Metropolitan Newtownabbey Abbot's Cross, Ballyduff, Beverley Road, Carnmoney, Cloughfern, The Diamond (Rathcoole), Jennings Park, Kingspark/Kings Crescent, Mallusk, Mayfield, Merville Garden Village, Monkstown, Mossley West and Richmond. **Antrim** Greystone and Parkhall **Rural** Ballynure, Doagh, Parkgate, Templepatrick, and Toome

Table 4: Antrim and Newtownabbey Retail Hierarchy

SP 2.13 The Council will identify the detailed boundaries of our Borough's retail centres in the Local Policies Plan and will undertake regular health checks in the future (normally every 5 years) to monitor their vitality and viability.

SP 2.14 The Council will work with its statutory partners and other stakeholders to bring forward measures that will support our Borough's centres, enhance the quality of retail floor space and reduce overall vacancy levels. This will include public realm schemes, meanwhile uses, enhanced landscaping, opportunities for improved accessibility by all transport modes, including walking and cycling, improved parking, an enhanced tourism offer and profile-raising events as well as promoting high quality design in new developments in accordance with Policy SP 6: Placemaking and Good Design.

Town Centres and Retailing

5.17 Our Borough offers a well-established and vibrant retail sector, which contributes significantly to the economic prosperity of the area and attracts visitors and inward investment. The retail sector is a source of significant employment supporting almost 20% of our Borough's jobs and it is imperative that the vitality and viability of the Borough's existing commercial centres is maintained and protected from the adverse effects of competing out of centre development.

5.18 Based on the Retail and Commercial Leisure Study undertaken in support of the Plan Strategy, the Council has identified a retail hierarchy that recognises the traditional town centres of Antrim, Ballyclare, Crumlin and Randalstown, with town centres also identified at Abbey Centre and Glengormley in Metropolitan Newtownabbey. These are complemented by district centres at Northcott and Whiteabbey Village.

5.19 Whilst the six town centres vary greatly in size and the level of provision of services afforded, they all perform an important function in meeting the needs of residents within their surrounding catchment areas. In addition to providing a wide range of retailing and related facilities, leisure and cultural uses, our Borough's town centres act as key community focal points and shared spaces. They play an important role in bringing people together, fostering community pride and helping to define a sense of place.

5.20 Regional planning policy recognises the importance of accessible and vibrant town centres and advocates that they are promoted as the appropriate first choice location for retailing and other complementary uses. The Council's Retail Strategy accepts and supports this approach and as a consequence, our Borough's town centres shall be the preferred location for future retail growth and investment and the principal focus for the development of other town centre uses and complementary services. To afford appropriate control over competing development a sequential test will be applied to retail development and town centre uses proposed outside these centres. In addition, the Council's Retail Strategy specifically recognises the need to carefully control future development at The Junction Retail Outlet and Leisure Park in Antrim to help maintain the vitality and viability of the nearby Antrim town centre.

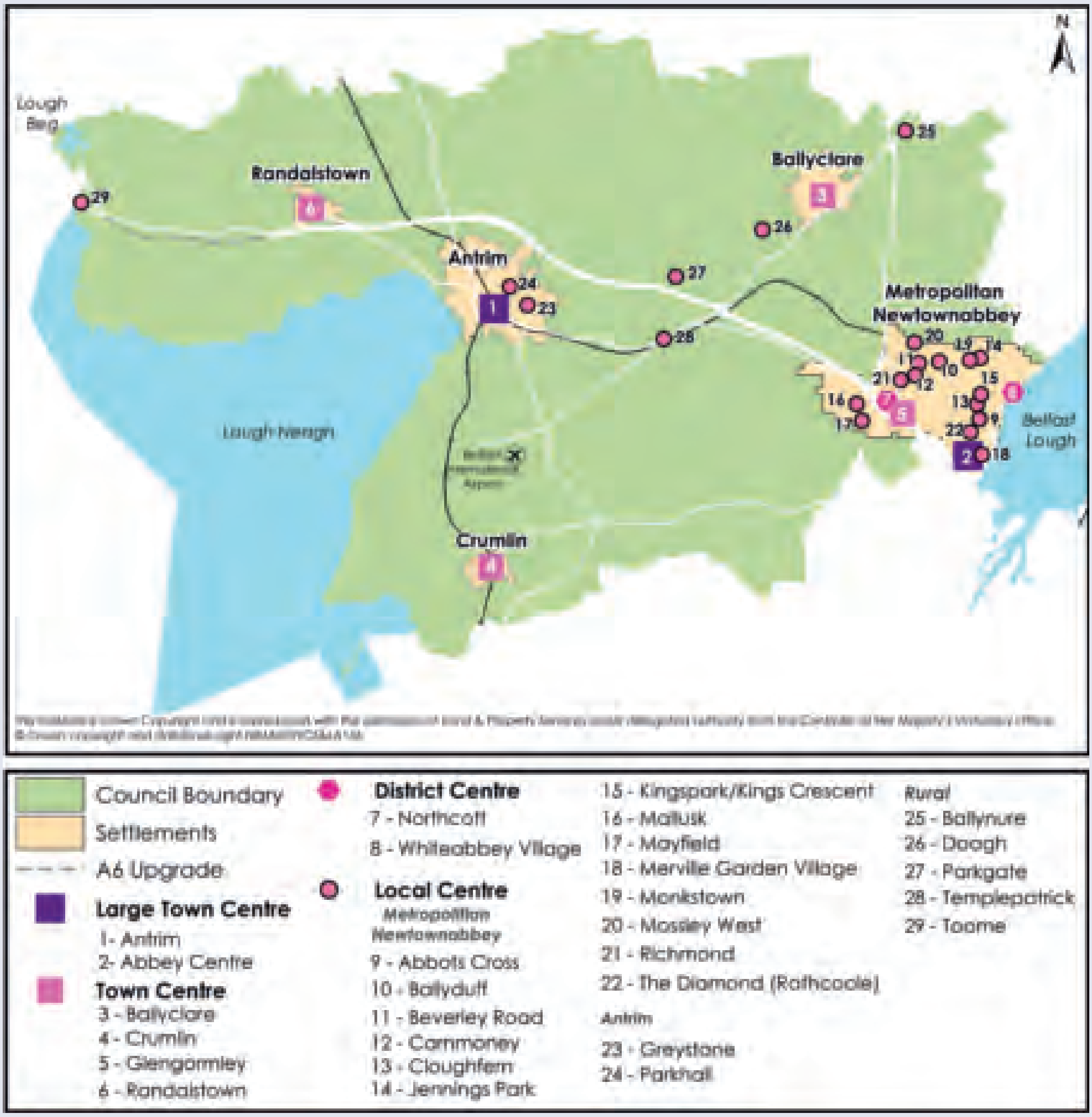


Figure 5: Hierarchy of Centres in our Borough

Policy DM 5:
Farm Diversification

DM 5.1 The Council will support the reuse and/or adaptation of farm buildings as part of a farm diversification scheme to be run in conjunction with existing agricultural operations where:

(a) The farm business has been established and operational for a continuous period of 6 years; and

(b) The nature and scale of the proposal respects the established rural character and does not result in any significant adverse amenity impacts.

DM 5.2 Exceptionally a new building may be permitted where it has been demonstrated that there is no existing building available to accommodate the proposal, either because they are essential for the operation of the existing farm business or their reuse, even with adaptation, is not feasible.

DM 5.3 New buildings should be sited to cluster with the existing farm group unless this would be prejudicial to the operation of the farm or there are sound environmental or amenity reasons to justify a suitable alternative site.

Development within Centres

Why we have this Policy

5.39 The aim of this policy is to recognise and promote the positive role of our Borough's town, district and local centres as the most appropriate locations for retail development and other employment, leisure and cultural uses which meet the needs of our residents. This aim has taken account of and is consistent with the provisions of the SPPS.

5.40 The Council wishes to promote sustainable development within the Borough's identified centres, ensuring that new developments are located where there are good public transport services, with better access for those walking and cycling and with less dependence on private car usage. This

complements the Council's overall town centre first approach and seeks to help sustain and enhance the vitality and viability of our Borough's centres, which are important hubs for a range of activities that have a positive impact on those who live and work in, or visit them.

5.41 In addition, in an increasingly digital world where online retailing continues to gain market share, the town centre offers an attractive 'experience' and choice for customers. The diversity of use, both during the day and in the evening time, helps bring life to the town centre and contributes to making it a more attractive place for local residents, shoppers and visitors.

Policy DM 6:
Development within Centres

DM 6.1 The Council will encourage and support a diverse range of retail and complementary uses within our Borough's centres provided these support rather than detract from the successful functioning of the centres and their ability to meet local needs. All development proposals will be required to demonstrate that they will:

(a) Contribute positively to the vitality, viability and diversity of the centre;

(b) Maintain or enhance the visual amenity of the area by providing an active and attractive frontage appropriate to the location; and

(c) Not unacceptably impact on daytime footfall.

DM 6.2 Proposals that would result in the loss of retail units will only be permitted where it is demonstrated that the retail use of the unit is no longer viable (e.g. evidence to show that despite marketing of the unit/building for at least 12 months there has been no interest shown) and this will not result in a concentration of non-retail uses that would be harmful to the shopping function of the centre.

DM 6.3 Proposals for commercial leisure and entertainment facilities, including restaurants, cafes and bars should not have a detrimental impact on the amenity of adjacent or nearby residential properties.

DM 6.4 On the upper floors of premises, particularly where property is underutilised, the Council will support the retention and development of housing and other complementary town centre uses.

Development outside Centres

Why we have this Policy

5.42 The aim of this policy is to protect the role, viability and vitality of existing town centres from the adverse impacts that can arise from competing development proposals for retail and other town centre uses in other locations. A sequential test must therefore be undertaken for relevant proposals on sites located outside our Borough's centres and, where appropriate, a retail impact assessment must also be undertaken. This aim has taken account of and is consistent with the provisions of the SPPS.

5.43 As part of the Council's town centre first approach and based on evidence arising from the Retail and Commercial Leisure Study undertaken for the Plan Strategy, a policy presumption against out of centre food store/supermarket uses is introduced in the towns of Ballyclare, Crumlin and Randalstown as such development is likely to have a considerable adverse impact on the health of these centres.

5.44 Whilst seeking to protect town centres, the Council does however, recognise the important role that small local shops, and village shops play in serving neighbourhood needs as well as providing a sense of community.

5.45 In the countryside, retail and commercial facilities will generally be limited to those associated with an appropriate farm diversification scheme or those that meet a local tourist need.

Policy DM 7:
Development outside Centres

Sequential Test

DM 7.1 In considering development proposals for retail use (including extensions) and other main town centre uses that generate significant footfall, such as commercial leisure uses, outside our Borough's centres, the Council will apply the following sequential test which requires that locations for new development be considered in the following order of preference:

- Town Centre sites;
- Edge of Town Centre sites; and
- Out of Centre locations that are, or can be made, accessible by walking, cycling and public transport.

DM 7.2 Proposals for retail use and other main town centre uses which generate significant footfall in other out of centre locations will only be acceptable where, having regard to the expected catchment of the development, all of the following criteria are demonstrated:

(a) All town centre, edge of town centre and other commercial centre options have been assessed and discounted as unsuitable, unviable or unavailable. Where there are multiple centres within the defined catchment area, the order of preference should be to develop in the higher order centre;

(b) The scale of development proposed is appropriate to its location, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location;

(c) There will be no significant individual or cumulative adverse effect on the vitality and viability of existing town centres within the catchment;

(d) The proposal will help to meet qualitative or quantitative deficiencies; and

(e) The site can be easily accessed by a range of transport modes.

DM 7.3 The Council will however, apply flexibility in considering proposals for community, education and healthcare facilities to ensure these are located where they are easily accessible to the communities that they are intended to serve.

DM 7.4 The Council will operate a presumption against the development of food store/supermarket uses in an out of centre location in the towns of Ballyclare, Crumlin and Randalstown.

Retail Assessment

DM 7.5 A Retail Assessment will be required for any development proposal that involves an increase of more than 1,000 m2 (gross) of retail floor space outside any of our Borough's centres. The Retail Assessment should provide a proportionate response to the proposal being sought and incorporate an assessment of need, impact and the sequential test.

DM 7.6 Applications to vary or delete restrictive conditions applying to existing out of centre premises, such as sale of bulky goods, will be assessed under this policy.

Small Shops

DM 7.7 Proposals for individual small shops (including those associated with a petrol filling station) or commercial leisure use in out of centre locations will be supported provided:

(a) It is small scale, generally no greater than 200 m2 (gross) of floor space; and

(b) It serves the needs of the local community or is ancillary to an existing use.

Villages and Hamlets

DM 7.8 Proposals for retail development in those villages where no local centre is defined and in hamlets will be supported provided:

(a) It is demonstrated it meets a local need that will sustain the community; and

(b) It is for a small-scale convenience store in keeping with the size and character of the settlement.

The Countryside

DM 7.9 The Council will support the development of appropriate small-scale retail and ancillary commercial leisure uses in the countryside such as farm shops, craft shops, and shops/cafes serving tourist or recreational facilities where they are an integral part of and ancillary to an existing business or facility. The reuse or conversion of buildings will be encouraged.

Development at The Junction, Antrim

Why we have this Policy

5.46 Located north of Antrim Town Centre, The Junction Retail Outlet and Leisure Park, constitutes the largest provision of out of centre floorspace in our Borough. The genesis of The Junction development was as an outlet and retail warehouse park.

5.47 The aim of this policy is to ensure that the core role and function of The Junction as an outlet and retail warehouse park remains distinguishable from Antrim Town Centre and that Antrim Town Centre is recognised as the first choice destination in Antrim for town centre uses. This aim has taken account of and is consistent with the provisions of the SPPS.

Policy DM 8:
Development at The Junction, Antrim

DM 8.1 The Council will support the ongoing redevelopment at The Junction Retail Outlet and Leisure Park in Antrim in accordance with the terms of the Outline Masterplan approved by the Council.

DM 8.2 In assessing future proposals at or within the environs of The Junction, in addition to the requirements of Policy DM 7, the Council will operate a presumption against development that is likely to impact adversely on the continued vitality and viability of Antrim Town Centre. This includes:

(a) Proposals for additional comparison goods floor space;

(b) Proposals that seek to vary or remove planning restrictions for bulky goods retail or outlet use to provide unencumbered retail use; and

(c) Proposals for the subdivision of large commercial units into smaller units.

Annex 2 – Ken Gunn Consulting Paper

Antrim and Newtownabbey Local Development Plan 2030: Draft Plan Strategy

Policy DM8 – Development at The Junction, Antrim – Commercial perspective

1. Executive Summary

- Demographics and technology are transforming retailing at unprecedented speed. Retailers, high streets and investors are struggling to adapt to a high rate of business failures
- Many small and mid-sized retail centres are designed to serve a previous generation of consumers and are functionally obsolete
- For comparison goods retailers, small centres are unprofitable. Progress towards a more sustainable role for smaller centres, however, is being delayed by legacy property valuations and a lack of available funding to modernise and repurposing assets
- The categorisation of Antrim town centre within the same hierarchical tier as the Abbey Centre is not credible
- Vacancy in Antrim town centre has more to do with changing retail economics and real estate finance than competition from The Junction
- The Junction is a unique, specialist and complementary retail destination which achieves 65% greater comparison goods turnover than Antrim town centre
- For consumers, The Junction is an integral part of Antrim's offer. Without The Junction, the status of Antrim as a major retail destination within the shopping hierarchy cannot be justified
- Planning policy which aims to protect Antrim town centre by restricting development at The Junction is more likely to increase leakage from the Borough to Ballymena than to improve Antrim town centre
- There is a strong opportunity to develop Antrim town centre as a destination for leisure, services, convenience and low order comparison goods which serves locals, tourists and those brought into the Borough for special shopping at The Junction
- While a presumption in favour of development in Antrim town centre is in line with national planning policy, The Junction and Antrim town centre have a symbiotic relationship which requires a balanced policy approach to ensure their sustainable future.
- Planning policy needs to be agile, flexible and must allow both centres to adapt into sustainable future roles in the face of the prolonged structural changes in retailing.

2. Introduction

2.1. Located c.1.5 miles north of Antrim Town Centre, The Junction Retail and Leisure Park is the largest provision of out of town floorspace in Antrim and Newtownabbey Borough. Conceived as an outlet and retail warehouse park, the Draft Plan policy aims to ensure that the core function of The Junction as an outlet and retail warehouse park remains distinguishable from Antrim Town Centre and that Antrim Town Centre is recognised as the first-choice destination for town centre uses.

2.2. While Policy DM 8.1 supports the ongoing redevelopment at The Junction in accordance with the terms of the Outline Masterplan[1] approved by the Council, Policy 8.2 indicates that the Council will operate a presumption against development that is likely to '*impact adversely on the continued vitality and viability of Antrim Town Centre*'. This includes

[1] Application No. LA03/2017/0234/O, 2 March 2017. Approval granted 14 December 2017

proposals for additional floorspace, change of use (relaxation of bulky goods and outlet restrictions) or subdivision of large units.

2.3. While Policy DM 8 embodies the important principal of *town centre first*, far greater threats than decentralisation have now emerged in the shape of demographic, attitudinal and technological changes. These are redefining consumer choice, disrupting traditional demand at retail centres and drive the continuing financial weakness of retail and retail real estate businesses across the planet.

2.4. Such is their profound impact; these changes cannot be contained by planning policy alone and substantial investment is required to upgrade and adapt retail centres so that they remain relevant for future consumers. A substantial portion of this investment will be required to originate from the private sector, including owners of retail assets such as Antrim Mall and The Junction. Private sector investment, however, relies on achieving a financial return and is therefore inextricably linked with the profitability and sustainability of retailing. At present, investors are fleeing from retailing and those that remain are battling for survival rather than investing for the future.

2.5. It is therefore critically important that the emerging policy for Antrim and Newtownabbey considers the global challenges facing retailing and creates a planning environment in which local retail centres can survive, adapt and grow by maintaining relevant and commercially sustainable offers. This document has been prepared by Ken Gunn Consulting Limited on behalf of EPISO 4 Antrim S.à.r.l. to suggest ways in which Antrim and Newtownabbey Borough Council can play a positive role in shaping the commercial fortunes of Antrim town centre and The Junction within emerging planning policy.

3. The Changing Face of Retailing

3.1. UK Retailing is undergoing a fundamental restructuring. Changing demographics, generational attitudes, new technologies and globalisation have created a new consumer paradigm. Physical retailing is transforming from functional locations where product is consumed to immersive destinations where place, space and time are consumed.

3.2. Growth in online sales (but not necessarily profitability) and increases in the cost base of physical retailing has led to diminished demand for retail space. Online accounts for 19% of fashion sales and is expected to grow to 25% in the next decade[2]

3.3. Conscious customers now base their buying decisions on many factors beyond price. These new consumers, led and influenced by millennials, are exerting influence on retailers and forcing them to adapt

3.4. The majority of town centres, shopping centres (and management practices) are designed for a previous generation of customers and are increasingly obsolete

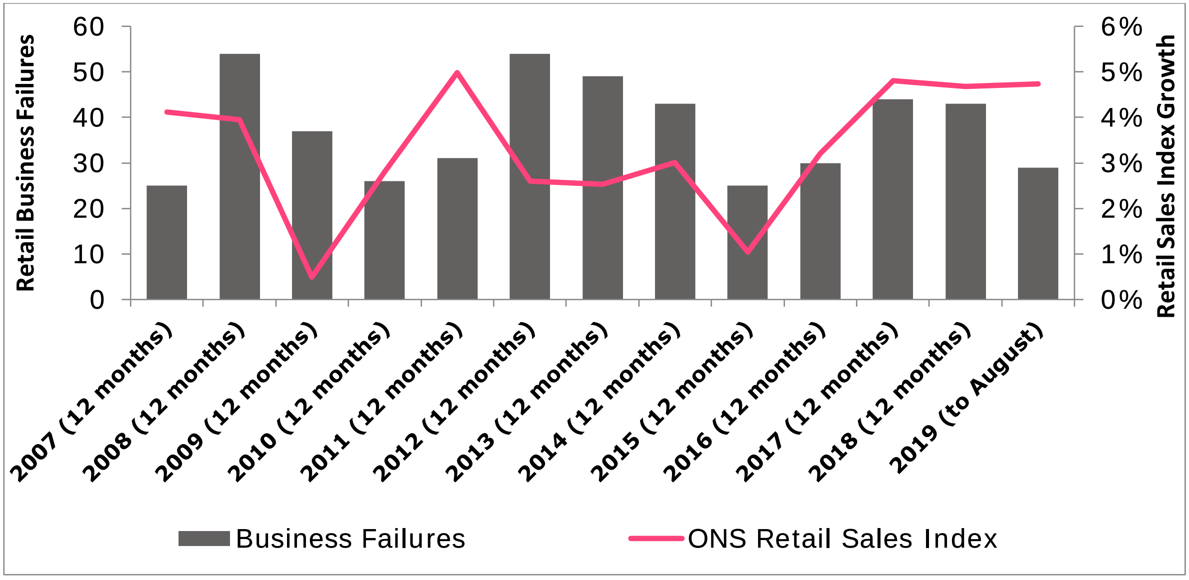
3.5. Footfall has been declining on many high streets and smaller shopping centres for several years as consumers migrate to more appropriate experiences. The latest research by the British Retail Consortium and Springboard[3] identifies that footfall in shopping centres across the UK declined by -2.4% in June 2019, however, in the largest

[2] Centre for Retail Research

[3] BRC-Springboard Footfall and Vacancies Monitor June 2019

centres (of more than half a million sq. ft), the drop was just -0.5%, and only -0.1% in those largest centres with a strong dining offer.

3.6. In the year to August 2019, the Centre for Retail Research identifies that 35,144 employees in more than 1,000 shops had been affected by the corporate failure of 29 UK retail businesses[4]. These include House of Fraser, Debenhams, Jack Wills and LK Bennett. The chart below shows that despite a relatively high rate of retail sales growth in 2017 and 2018, the number of business failures has remained relatively high, with 2019 on course to be another challenging year for retail jobs.



Source ONS, Centre for Retail Research

3.7. For the past 30 years, the financial model of the traditional bricks-and-mortar retailer has been based on regular increases in sales, 25-year leases with upwards-only rent reviews, high rents and occupancy costs and some freedom within limits to set prices. This is now broken as a result of pared-down discounters that focus on the cheapest price and online retailers with low operating costs that can provide virtually any product, quickly, at a lower price.

3.8. Investment activity in the retail property sector has fallen dramatically over the last five years, with retail accounting for 20% of all investment deals by volume in 2014, and only 8.2% in the first quarter of 2019. Indeed, according to Property Data[5], only £788m was invested in retail property in the first quarter of 2019, the lowest level of investment activity since 2000.

3.9. The impact of these broad structural trends continues to be felt across Northern Ireland. Footfall at The Junction has steadily declined[6], 29 out of 67 units (43%) at Junction One Factory Outlet centre are vacant and the former Dunnes store in Antrim town centre has been empty since closure in late 2015. The subsequent successful reinvention of Dunnes as an upmarket, lifestyle retailer is a painful but very clear message that towns

[4] Who's Gone Bust in Retailing 2010-19? to August 2019. Centre for Retail Research

[5] Shopping Centre and High Street Spotlight, Savills Q1, 2019

[6] The Economic Impact of Redeveloping Junction One Report (Oxford Economics February 2017) submitted by EPISO 4 Antrim S.à.r.l. with the Masterplan outline application LA03/2017/0234/O.

such as Antrim (along with Portadown and Ballymoney) had not only ceased to be sustainable for Dunnes' previous format but are no longer suitable for investment in the company's new format stores.

4. The Emerging Future for Retailing

4.1. Customer experience is now essential as retailers and shopping centres strive to differentiate themselves in a challenging and crowded market

4.2. Interviews with a wide range of industry experts conducted by Pragma Consulting in 2018 identified that tomorrow's customers will seek Discovery, Authenticity, Education, Uniqueness, Personalisation, Community, Convenience, Wellness, Sustainability and Empowerment.

4.3. According to consultants AT Kearney[7], investors need to break from yesterday's patterns and practices and fully embrace a consumer-driven future through the creation of Consumer Engagement Spaces which offer mixed-use visitor experiences. These include;

- Destination Centres: large spaces centred around a large attraction e.g. Xanadu in Spain, the Mall of the Emirates in Dubai or the American Dream Center
- Innovation Centres: "smart" spaces where pooled tenant data is used to create targeted offerings
- Values Centres: spaces that draw their identity—and tenants—from consumers' shared values e.g. Great Food Hall in China, the Market Hall in Portland, the Markthal in the Netherlands or Eataly.
- "Retaildential" Spaces: retail-housing "lifestyle centres" that target specific demographics

4.4. In addition, convenience will remain a powerful driver of demand for places, particularly community focussed facilities or transport interchanges which drive high footfall. As these tend to be small, local centres, a gap has opened where medium sized, functional centres can no longer compete with large destinations for choice or experience. Many of these are actively looking at a reduction in retail floorspace, to be replaced with community facilities, leisure and increasingly residential uses.

5. The role of The Junction

5.1. The Ulster based Card Group carries out a weekly survey of visitors at The Junction in order to present management with an accurate picture of the origin, nature and shopping habits of visitors. Across the year, the surveys identify that The Junction has sub regional catchment which covers the northern half of Ulster stretching from Belfast in the east to Derry in the west and from Craigavon in the South to Coleraine in the north.

5.2. The July 2019 survey reports an average visitor drive time of 23 minutes. This is longer than a typical town centre (c.15 minutes), indicating that The Junction has a point of

[7] The Future of Shopping Centres, AT Kearney, 2018

difference for consumers who are prepared to pass competitors such as The Abbey Centre or Ballymena to shop.

5.3. The July 2019 survey also records an average of 17 visits a year to The Junction for non grocery shopping, compared to a total of 40 visits a year for all non grocery shopping trips. Even for loyal shoppers, only 43% of non-grocery shopping trips are attracted to The Junction indicating that it has a limited role which satisfies a minority of shopping needs. This is also the case for grocery shopping, the average of 13 trips a year to The Junction representing 25% of all grocery shopping trips (53 per annum).

5.4. These results indicate that The Junction attracts a minority of shopping trips and not the majority. Clearly, The Junction, does not satisfy all of the needs of all of its visitors, all of the time. Opportunities exist for other centres to complement The Junction by satisfying those needs which visitors direct to other centres throughout the year

6. The role of Antrim town centre

6.1. In the Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council, Nexus Planning supports the Council's suggestion that Antrim town centre should be classified as a Tier 1 Large Town Centre, similar to the Abbey Centre[8]. From a commercial perspective, there are clear differences in the roles and scale of potential of Antrim town centre and the Abbey Centre, and this is not a credible conclusion.

6.2. For example, Nexus Planning identifies annual comparison goods turnover of £21.5m[9] in Antrim town centre, just 8% of the annual comparison goods turnover of the Abbey Centre (£272.1m), a deficit of community facilities at the Abbey Centre and a scale difference in market share within the study area of nearly 13 times.

6.3. In fact, Nexus Planning points out in the Retail and Commercial Leisure Study that Antrim town centre is not significantly larger [in spatial extent] than Ballyclare[10], which is categorised as a Tier 2 Town Centre[11]. Ballyclare achieves a smaller comparison goods turnover (£13.1m) than Antrim[12] however, this is much closer in scale to Antrim town centre than Antrim town centre is to the Abbey Centre.

6.4. The Retail and Leisure Study also highlights significantly different market potential at the three centres with a table of Retail Hierarchy Indicators[13] indicating 10-minute drive time populations of 29,572 for Antrim, 25,174 for Ballyclare and 106,811 for Abbey Centre. Whilst a drive time isochrone is not indicative of a centre's draw, the immediate potential around Antrim is similar to Ballyclare 25,174 and less than one third (28%) of the Abbey Centre, suggesting that a much stronger argument can be made for categorising Antrim town centre as a Tier 2 Town Centre, than as a Tier 1 Large Town Centre.

6.5. If Antrim town centre is more realistically categorised as a Tier 2 Town Centre, then a much clearer difference emerges between in its everyday community role and The

[8] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 104, Fig 6.2
[9] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 83, Fig 5.10
[10] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 111, par 6.58
[11] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 104, Fig 6.2
[12] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 83, Fig 5.10
[13] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 99, Fig 6.1

Junction's more occasional, speciality shopping role. This suggests that Antrim town centre and The Junction have a complementary rather than a competitive relationship.

7. The importance of The Junction for Antrim and the Borough

7.1. The Retail and Leisure Study includes a number of comments which contradict the above conclusion by suggesting that issues such as a 'slightly higher proportion of convenience goods' or high levels of vacancy at Castle Mall are due to the presence of The Junction[14]. This 'competitive' view, overlooks the major structural changes which have and continue to affect retailing, the impact of these changes on the hierarchy of retail centres, the poor financial health of retail businesses and the inability of landlords to adapt to the changing commercial value of retail locations due to high debt leverage and falling rental incomes.

7.2. For example, the hierarchy of retail centres has changed dramatically over the past 30 years. Originally, a typical fashion retailer such as Burton or Dorothy Perkins might have required stores in 500 towns to adequately cover the United Kingdom however, changes in shopping patterns (driven by improved private transport, media driven brand awareness, a focus on development in the largest city centres, increased time available for leisure and shopping and consumer's unwillingness to settle for second best) has reduced this number to a mere 50 centres. Over the last decade, comparison goods retailers have steadily closed stores in smaller towns so that today as a result, many of the UK's retail centres no longer support the higher order goods they once provided.

7.3. With technology fuelled change likely to allow consumers greater choice, it is highly improbable that Antrim town centre can ever offer the same depth and variety of goods available at large centres such as the Abbey Centre.

7.4. In 2018, Pragma Consulting undertook assessment of the sustainability of the UK high street by using profit and loss financial models for a portfolio of 100 retail businesses to explore the impact of falling footfall / sales and rising costs (wages and rates). The Virtual High Street report[15] concluded that in order to offset the cumulative impact of falling sales and rising costs, occupancy costs (rents, rates and service charges) would need to fall by 25%. Of course, no landlord will willingly take such a cut in income and what we are witnessing in town centres is a gradual market driven correction which will take many years to complete.

7.5. Many retail properties are highly leveraged, with investors borrowing as much as 70% to 80% of a shopping centre's value. Rising vacancy due to persistent company failures has led to reduced centre income, falling asset values, loan to value breeches[16], bank recoveries, limited financial scope for rent concessions and a lack available profits to invest in modernising or repurposing assets.

7.6. Despite recent improvements in retail sales, vacancy rates in towns remain persistently high[17] and a reflection that retail demand has shifted elsewhere. It is interesting to note that the vacancy in Antrim town centre is entirely located within Castle Mall. This is unusual as towns which have been impacted by out of town competition normally suffer high vacancy along unmanaged secondary streets, rather than managed shopping centres. Antrim's situation suggests that the town's smaller landlords have

[14] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 33, 36

[15] Virtual High Street – The impact of Footfall, Rates and the Minimum Wage, Pragma Consulting, June 2018

[16] Shopping centres breach loan terms after stores fail, FT.com 28/05/2019

[17] Colliers Midsummer retail report 2017

better adapted to the changing economic climate and that the vacancy in Castle Mall is a chronic, legacy condition which has been brought about by changing consumer habits (not competition from The Junction) and perpetuated by a lack of remedial expenditure as a result of the centre falling into administration. This situation will only be alleviated by a change in property valuation, (possibly) ownership and the enforced or voluntary transition of the centre to a more sustainable role.

7.7. Looking to the future, Nexus Planning suggests that the Council could pursue a visionary Masterplan for Antrim town centre, bringing together aspirations for improving the environment and occupancy of Castle Mall, the potential to better harness the footfall draw of Tesco Extra for the Town Centre as a whole, and opportunities for better connections with Castle Gardens and the tourist trade[18]. Whilst improvements in the connectivity with Tesco Extra and Castle Gardens are to be supported, the current retail paradigm suggests that an 'aspiration to improve the environment and occupancy of Castle Mall' is neither realistic nor commercially affordable given clear differences between the role of Antrim town centre and major centres such as the Abbey Centre

7.8. The Borough's Policies need to better reflect the sustainable future role of centres and recognise that Antrim town centre is no longer a commercially attractive or sustainable location for higher order comparison goods. That is not to say that future opportunities will not exist for comparison goods retailing in Antrim town centre but that the nature of these is more likely to be driven by urgent needs and leisure visits rather than traditional everyday comparison-shopping needs.

7.9. The Retail and Leisure Study suggests that The Junction achieves annual comparison goods turnover of £35.4m[19], 65% greater than Antrim town centre (£21.5m) but just 37% of the turnover attracted to nearby Ballymena town centre (£96.3m) from within the study area. Together, Antrim town centre and The Junction achieve sales (£56.9m) which are 60% of the turnover leaking to Ballymena, suggesting that in combination they offer consumers a realistic alternative. On its own however, Antrim town centre is not strong enough to resist the appeal of Ballymena for the Borough's residents and planning policy which aims to protect Antrim town centre by restricting development at The Junction is more likely to drive greater leakage to Ballymena than to improve Antrim town centre.

8. The economic benefits of The Junction

8.1. The Junction is an important source of employment and income for residents of Antrim and Newtownabbey Borough. The Junction supports c.459 jobs[20], with full delivery of the Masterplan (approved by Antrim and Newtownabbey Borough Council) projected to create an additional 475 jobs.

8.2. By providing a combination of outlet and large footprint warehouse stores, occupiers at The Junction benefit from stores which are generally more profitable to operate (due to lower fit out, labour and occupancy costs) than stores in traditional town centres. As a result, The Junction can accommodate retailers who would find it impossible to operate in traditional town centres such as Ballymena or Antrim. The combination of occupiers such as Asics, Gap, Golf Nation, Nike, Tom Tailor and Pavers is therefore unique, and

[18] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 109. Par 6.51

[19] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 83, Fig 5.10

[20] The Economic Impact of Redeveloping Junction One Report (Oxford Economics February 2017) submitted by EPISO 4 Antrim S.à.r.l. with the Masterplan outline application LA03/2017/0234/O.

The Junction plays a critical role both in terms of drawing spend from outside the Borough and maintaining the relevance of Antrim as a destination for consumers.

8.3. Visitors at outlet centres often consider themselves to be undertaking day visits rather than shopping trips. This encourages visitors to look for other activities and destinations to full up their day, particularly local destinations which offer cultural, entertainment and catering opportunities. In its formative years, surveys undertaken by CACI at Junction One as it was originally branded, suggested spin off to Antrim town centre of around 15%, indicating a substantial benefit. Given that 95% of those who visit Antrim town centre the most travel by car[21], it is likely that linked trips between The Junction and Antrim town centre remain a regular occurrence.

8.4. Not only is The Junction important in generating employment for the Borough's residents and rateable income, it's presence has a material benefits for Antrim town centre.

9. Policy Implications

9.1. Antrim town centre and The Junction One have a complementary and symbiotic relationship rather than a competitive relationship. This can be nurtured to enable the future sustainable growth of both locations by ensuring that the emerging planning policy for Antrim and Newtownabbey Borough is not over prescriptive when it comes to administrating top down national policies which seek to protect town centres by presuming against development or changes at out of town centres. It is important to view both locations as working together in the same way that the Borough's consumers do, despite the obvious distance between them.

9.2. The policy objective in the Local Development Plan | 2030[22] seeks to ensure that the core role and function of The Junction as an outlet and retail warehouse park remains distinguishable from Antrim town centre and that Antrim town centre is recognised as the first-choice destination in Antrim for town centre uses. While the evidence base supporting the Draft Plan indicates that a clear and substantial difference in roles exists between the centres, it challenges the Council's belief that Antrim town centre should be categorised as a Tier 1 Major Town Centre, alongside the Abbey Centre.

9.3. In seeking to protect Antrim town centre the Draft Policy will create a paper tiger. Not only will Policy DM8 potentially restrict the ability of The Junction to adapt in response to the rapidly changing retail market but is likely to prevent those changes which would move Antrim town centre onto a more sustainable future footing. Antrim town centre should not be directed into a role that is no longer relevant or sustainable for its scale, while the emerging policies towards the Junction must be agile, flexible and to allow managers scope to adapt reasonably in response to future challenges.

9.4. Failure to provide this change in approach will hamper The Junction's attempts to remain relevant to changing consumer demand, limit opportunities to exploit the symbiotic relationship which exists between The Junction and Antrim town centre, constrain future growth and prevent the realisation of sustainable roles which benefit the Borough's residents at both centres.

[21] Retail and Commercial Leisure Study for Antrim and Newtownabbey Borough Council page 34

[22] Local Development Plan | 2030 Draft Plan Strategy Document

Ken Gunn – Profile

Ken Gunn has provided specialist real estate feasibility and investment studies for more than 30 years. He spent the initial part of his career working for major UK retailers (Allied Carpets, Boots and Somerfield) and property advisors and the last two decades in senior roles at CACI, FSP and Pragma, where he led more than 600 consultancy projects. Notable commissions include feasibility studies for Westfield London, Edinburgh St James and Victoria Quarter Leeds, asset strategies for Birmingham Bullring, Brent Cross Shopping Centre and The Dubai Mall and Pre-Acquisition studies at Liffey Valley SC Dublin, Highcross SC Leicester and St Enoch SC Glasgow.

Ken is an internationally recognised authority on Designer Outlet Centres. He has worked on more than 180 outlet projects totalling 3.5 million m^2, in 35 countries over 15 years. Ken provides direction for new developments, devises growth strategies for existing assets and explains trading opportunities to brands, operators and investors. Example projects include:

- Feasibility Studies – Edinburgh St James, Fashion Arena Prague, Honfleur Normandy Outlet, Junction One Antrim, Lexicon Shopping Centre, Bracknell, Marshall's Yard Gainsborough, Powisle Power Station Warsaw, West Midlands Designer Outlet Cannock, Victoria Gate Leeds, Westfield London and Westfield Stratford
- Growth Strategies – Birmingham Bullring SC, Blackpool town centre, Bournemouth Town Centre, Clarks Village, Dubai Mall, Gunwharf Quays, Foss Park Leicester, Franciacorta Outlet Village, Cheshire Oaks, Silverburn SC, Glasgow, St Stephen's Green Dublin, The Junction RP Crewe, Union Square SC Aberdeen
- Pre-Acquisition Studies – Braintree Designer Outlet, Designer Outlet Wolfsburg, Dundrum SC, Dublin, Highcross Leicester, Liffey Valley SC Dublin, San Marino Outlet

Ken's approach can be described as a comprehensive, highly contextualised examination of site potential, which is evidence based, independent, forward looking and incorporates the latest best practice. He is particularly knowledgeable on how investors can innovate retail formats:

- to create vibrant and attractive destinations which suit the character of local markets
- to respond to local competition (full price and outlet) and brand demand
- to repurpose existing buildings, including historic properties and redundant shopping malls
- to deliver outstanding guest experiences which are irresistible to target audiences
- to exploit regional tourism and leisure synergies to maximise trading performance
- to provide 'future proof' propositions which embrace changing consumer needs
- to maximise project profitably at an increasingly broad spectrum of urban and rural locations

Ken is accomplished at linking diverse aspects such as culture, heritage, entertainment, design, commercial adjacencies, investment, operational management, competition and brand mix with trading performance and occupier sustainability. While every place is unique and every business is unique, Ken excels in finding the optimum ways to utilise this uniqueness to create the most attractive, vibrant and successful retail and leisure investments.

Ken is a regular conference speaker and has presented on more than 20 occasions at ICSC, MAGDUS, MAPIC and REVO. His retail insight and impartial comment can also be found in press articles around the world, from The Australian to The Wall Street Journal.

Annex 3 – Outline Masterplan LA03/2017/0234/O

Antrim and Newtownabbey
BOROUGH COUNCIL

OUTLINE PLANNING PERMISSION

Planning Act (Northern Ireland) 2011

Application No: **LA03/2017/0234/O**

Date of Application: **2nd March 2017**

Site of Proposed Development:	**Junction One Retail and Leisure Park, Ballymena Road, Antrim**
Description of Proposal:	**Outline masterplan to facilitate the comprehensive regeneration of Junction One, including the Factory Outlet Centre, Retail and Leisure Park, and vacant lands. Proposals include demolition and reconfiguration of existing buildings; erection of new buildings to include provision of restaurants/coffee shops, bulky goods retail warehousing, retail kiosks, indoor leisure and factory outlet units; creation of new children's play area, outdoor multi-purpose recreational facility, new gateway entrance road and re-configuration of internal road network; reconfiguration of car parking; provision of environmental improvement scheme featuring hard/soft landscaping and all associated site works (Proposed Master Plan layout to also incorporate the re-configuration of existing car park and 2 No drive thru restaurants/cafes, 1 No ancillary external seating area and 1 No ancillary childrens play area granted planning permission by LA03/2017/0014/F)**

Applicant:	Episo 4 Antrim S.a.r.l	Agent:	TSA Planning Ltd
Address:	16 Avenue Pasteur, Luxemburg, 2310 Luxem	Address:	20 May Street, Belfast, BT1 4NL

Drawing Ref: 01, 05/1

The Council in pursuance of its powers under the above-mentioned Act hereby

GRANTS OUTLINE PLANNING PERMISSION

for the above-mentioned development in accordance with your application subject to compliance with the following conditions which are imposed for the reasons stated:

Antrim and Newtownabbey
BOROUGH COUNCIL

1. Application for approval of the reserved matters shall be made to the Council within 6 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 8 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: In accordance with Section 62 of the Planning Act (Northern Ireland) 2011 having regard to the scale and nature of the proposal.

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 Council, in writing, before any development is commenced.

Reason: This is outline permission only and these matters have been reserved for the subsequent approval of the Council.

3. Prior to the commencement of any part of the development hereby approved a scheme for the phasing of all aspects of the Masterplan scheme as identified in drawing ref: 05/1, date stamped received 10th October 2017, shall be submitted to and agreed in writing with the Council. Priority within the phasing programme shall be afforded to the provision of the tree-lined boulevard running from the Stiles Way Roundabout to the Factory Outlet Centre, the necessary road works to the Stiles Way Roundabout itself and the public realm improvements forming part of the Masterplan scheme. The phasing scheme shall also provide details for the implementation of the children's play area and Multiple Use Games Arena

Reason: To secure the orderly development of the site in line with the stated design objectives and to ensure delivery of the children's play area and Multiple Use Games Arena as an integral part of the development.

4. The gross floorspace of the development hereby permitted, and as denoted on the stamped approved Proposed Masterplan drawing shall not exceed 18,766 square metres when measured internally and shall consist of the following elements:

a) Retail Warehousing Units the gross floorspace of which shall not exceed 13,473 square metres when measured internally;
b) Factory Outlet Units the gross floorspace of which shall not exceed 697 square metres when measured internally;
c) Retail Kiosks the gross floorspace of which shall not exceed 80 square metres when measured internally;
d) Food & Beverage Units the gross floorspace of which shall not exceed 1,729 square metres when measured internally; and
e) A Leisure Unit the gross floorspace of which shall not exceed 2,787 square metres when measured internally.

Reason: To enable the Council to exercise control over the nature, range and scale of the retailing and leisure activity to be carried out at the site and to ensure compliance with the objectives and policies for retailing and town centres.

5. The retail floorspace within the Retail Warehousing units hereby approved shall be used only for the sale and display of the items listed hereunder and for no other purpose, including any other purpose in Class AI to the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015: -

a) DIY materials, products and equipment;
b) Garden materials, plants and equipment;
c) Furniture and soft furnishings, carpets and floor coverings and electrical goods;
d) Such other items as may be determined in writing by the Council as generally falling within the category of "bulky goods".

Reason: To enable the Council to exercise control over the nature, range and scale of retailing activity to be carried out at the site and to ensure compliance with the objectives and policies for retailing and town centres.

6. The retail floorspace within the Factory Outlet units hereby approved shall be used only for the purposes of Specialised Retailing and for no other purpose in Class AI to the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015.

For the purposes of this condition specialised retailing means clearance stores operated by: -

- Manufacturers;
- Retailers who do not directly manufacture but who own their own brand; or
- The franchises or licensees of such manufacturers or retailers in each case selling at discount prices their own branded factory seconds, surplus stock, environmental stock or discontinued lines.

Reason: To enable the Council to exercise control over the nature, range and scale of retailing activity to be carried out at the site and to ensure compliance with the objectives and policies for retailing and town centres.

7. With the exception of the floor space hereby approved on mezzanine floors indicated on Drawing No. 05/1 no other internal operations, including the construction of or extension to approved mezzanine floors shall be carried out at the site to increase the gross floorspace available without the prior permission of the Council in writing.

Reason: To enable the Council to exercise control over the nature, range and scale of the retailing and leisure activity to be carried out at the site so as not to prejudice the continued vitality and viability of existing retail centres and to ensure that adequate provision has been made for parking, servicing and traffic circulation within the site.

8. None of the retail units within the development shall be sub-divided into independent or separate retail units without the prior permission in writing of the Council.

Reason: To enable the Council to exercise control over the nature, range and scale of the retailing and leisure activity to be carried out at the site and to ensure compliance with the objectives and policies for retailing and town centres.

9. No development shall take place until details of all proposed tree and shrub planting and a programme of works associated with each phase of development together with an associated landscape management plan(s) have been submitted to and agreed in writing with the Council.

Notwithstanding the indicative landscaping features set out on drawing 05/1, date stamped received 10th October 2017, additional landscaping shall be provided to soften the visual appearance of the large areas of car parking to be provided in the development hereby permitted.

Reason: To ensure the provision, establishment and maintenance of a high standard of landscape in the interests of visual amenity and the promotion of biodiversity and to accord with the provisions of Policy AMP9 of Planning Policy Statement 3.

10. If within a period of 5 years from the date of the planting of any tree, shrub or hedge, that tree, shrub or hedge is removed, uprooted or destroyed or dies, or becomes, in the opinion of the Council, seriously damaged or defective, another tree, shrub or hedge of the same species and size as that originally planted shall be planted at the same place, unless the Council gives its written consent to any variation.

Reason: To ensure the provision, establishment and maintenance of a high standard of landscape.

11. At the Reserved Matters stage, an odour impact assessment shall be carried out on any odours likely to arise from the development that might impact on the existing residential properties on the A26 Ballymena Road opposite the site. The assessment should be carried out in accordance with the Department for Environment, Food and Rural affairs report entitled "Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems" dated January 2005".

Reason: To ensure the amenity of nearby residential properties is protected.

12. The food and beverage units identified as FB-3 and FB-4 on Drawing No: 05/1, date stamped received 10th October 2017, shall not be operational at any time between 23:00-07:00hrs.

Reason: To ensure the amenity of nearby residential properties is protected.

Antrim and Newtownabbey BOROUGH COUNCIL

13. There shall be no deliveries to the food and beverage units identified as FB-3 and FB-4 on Drawing No: 05/1, date stamped received 10th October 2017, at any time between 23:00-07:00hrs.

Reason: To ensure the amenity of nearby residential properties is protected.

14. If during the development works, new contamination or risks are found which have not previously been identified, works should cease and the Planning Authority 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 Planning Authority in writing, and subsequently implemented and verified to its satisfaction.

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

15. As part of site clearance works, all remaining fuel storage tanks and associated infrastructure on the site shall be fully decommissioned in line with Pollution Prevention Guidance No. 2 (PPG2) and No. 27 (PPG27). Soil and groundwater sampling shall be undertaken for a suitable analytical suite. Should contamination be identified the requirements of Condition 14 will apply.

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

16. After completing any remediation works required under Conditions 14 and 15 and prior to occupation of the development, a verification report needs to be submitted to and agreed in writing with the Council. This report should be completed 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 environmental receptors to ensure the site is suitable for use.

17. A final construction environmental management plan (CEMP) associated with each phase of development shall be submitted to and agreed in writing with the Council by the appointed contractor at least eight weeks prior to the commencement of any development approved herein.

The (final) CEMP shall reflect all the mitigation and avoidance measures to be employed as outlined in the CEMP approved herein and contained within the Environmental Statement as Appendix A and which is date stamped received 16th June 2017.

The development shall be carried out in accordance with the mitigation measures, unless otherwise agreed in writing by the Council.

Reason: To ensure that the appointed contractor undertaking the work is well informed of all the risks associated with the proposal and to provide effective mitigation ensuring there are no adverse impacts on the integrity of the Lough Neagh and Lough Beg SPA/RAMSAR site.

18. As part of site clearance works, all remaining fuel storage tanks and associated infrastructure on the site shall be fully decommissioned in line with Pollution Prevention Guidance No. 2 (PPG2) and No. 27 (PPG27). Soil and groundwater sampling shall be undertaken for a suitable analytical suite.

Reason: To prevent polluting discharges entering and impacting on the site integrity of Lough Neagh and Lough Beg SPA/RAMSAR.

19. The necessary alterations to the layout and arrangement of the Stiles Way Roundabout shall be carried out in accordance with the drawing and information contained within the Environmental Statement Addendum, date stamped received 10 Oct 2017 and in accordance with a programme to be submitted to and approved in writing with the Council, prior to the commencement of any part of the development hereby approved.

Reason: To facilitate the convenient movement of all road users and the orderly progress of work in the interests of road safety.

20. A Road Safety Audit of the vehicular access taken from the Stiles Way Roundabout shall be submitted to and agreed in writing with the Council prior to the commencement of any development approved herein.

Reason: In order to minimise the potential impact of the development on road safety both internal to the development site as well as on the local highway network

21. Car parking spaces to serve the development as indicated in Drawing No: 05/1, date stamped received 10 Oct 2017, shall be provided in accordance with a programme to be submitted and agreed in writing by the Council. The programme shall detail the number, location and arrangement of the necessary car parking provision to serve each phase of site development and shall include an appropriate provision of disabled car parking spaces in accordance with guidance set out in the DOE Planning document 'Parking Standards'.

No part of the development hereby approved in each phase of development shall become operational until provision has been made and permanently retained for the parking of vehicles to serve each phase of the development as agreed in writing with the Council (February 2005).

Reason: To ensure the adequate provision of parking to serve the development.

22. Secure bicycle parking facilities shall be provided in accordance with a programme to be submitted to and agreed in writing by the Council. The programme shall detail the number, location, arrangement and specification of the necessary secure bicycle parking to serve each phase of site development in accordance with guidance set out in the DOE Planning document 'Parking Standards' (February 2005).

Reason: To ensure the adequate provision of secure bicycle parking facilities and promote a modal shift to more sustainable forms of transport.

Informatives

1. This Outline Planning Permisison is accompanied by an Environmental Statement and an Addendum.

2. Historic Environment Division: Historic Monuments draws the attention of the developer to the reporting requirements of the Historic Monuments and Archaeological Objects (NI) Order 1995.

3. The onus is on the developer to determine if there is existing water and sewer infrastructure within the property. It is an offence under Article 236 of the Water and Sewerage Services (Northern Ireland) Order 2006, to build over or near watermains, sewers, pipes and associated works owned and maintained by Northern Ireland Water unless with the prior consent of NI Water. The developer is advised to obtain details of existing infrastructure from NI Water by requesting a copy of the water and sewer records. Copies of NI Water records are supplied under Articles 257 and 258 of the 2006 Order. There is a nominal charge for this service.

4. The applicant should refer and adhere to the precepts contained in Standing Advice Note No. 4. Pollution Prevention Guidance, 5. Sustainable Drainage Systems and 11. Discharges to the Water Environment.Standing advice notes are available at;
http://www.planningni.gov.uk/index/advice/northern_ireland_environment_agency_guidance/standing_advice.htm

5. The applicant's attention is drawn to The Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended), under which it is an offence:
a) Deliberately to capture, injure or kill a wild animal of a European protected species, which includes all species of bat;
b) Deliberately to disturb such an animal while it is occupying a structure or place which it uses for shelter or protection;
c) Deliberately to disturb such an animal in such a way as to be likely to;
(i) affect the local distribution or abundance of the species to which it belongs;
(ii) Impair its ability to survive, breed or reproduce, or rear or care for its young; or
(iii) Impair its ability to hibernate or migrate;
d) Deliberately to obstruct access to a breeding site or resting place of such an animal; or
e) To damage or destroy a breeding site or resting place of such an animal.

If there is evidence of bat activity / roosts on the site, all works should cease immediately and further advice sought from the Wildlife Inspector's Team, Northern Ireland Environment Agency, Klondyke Building, Cromac Avenue, Gasworks Business Park, Belfast BT72JA. Tel. 028 90569605

6. The applicant's attention is drawn to Article 4 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly; kill, injure or take any wild bird; or take, damage or destroy the nest of any wild bird while that nest is in use or being built; or at any other time take, damage or destroy the nest of any wild bird included in Schedule A1; or obstruct or prevent any wild bird from using its nest; or take or destroy an egg of any wild bird; or

disturb any wild bird while it is building a nest or is in, on or near a nest containing eggs or young; or disturb dependent young of such a bird.

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence.

7. NIEA advises the developer that any tree, hedge loss or vegetation clearance should be kept to a minimum and removal should not be carried out during the bird breeding season including 1st March to 31st August, unless pre-clearance surveys show an absence of breeding birds.

8. The purpose of the Conditions 14, 15 and 16 is to ensure that any 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.

9. The applicant should ensure that the management of all materials onto and off this site are suitably authorized through the Waste Management Regulations (NI) 2006 and/or the Water Order (NI) 1999.

10. RU recommends that the applicant should consult with the Water Management Unit of NIEA regarding any potential dewatering that may be required during the redevelopment works including the need for a discharge consent. Discharged waters should meet appropriate discharge consent Conditions.

11. The applicant should use a Photoionization Detector (PID) to test for the presence of fuel volatile organic compounds (VOCs) at any areas of the site being developed / redeveloped that are down gradient of the petrol station. Should elevated concentrations of VOCs be detected, Conditions 15 and 16 will apply.

12. 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.

13. Any proposals in connection with the development, either temporary or permanent which involve interference with any watercourse at the site:- such as diversion, culverting, bridging; or placing any form of structure in any watercourse, require the written consent of the Rivers Agency. Failure to obtain

Antrim and Newtownabbey BOROUGH COUNCIL

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.

14. 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.

15. 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.

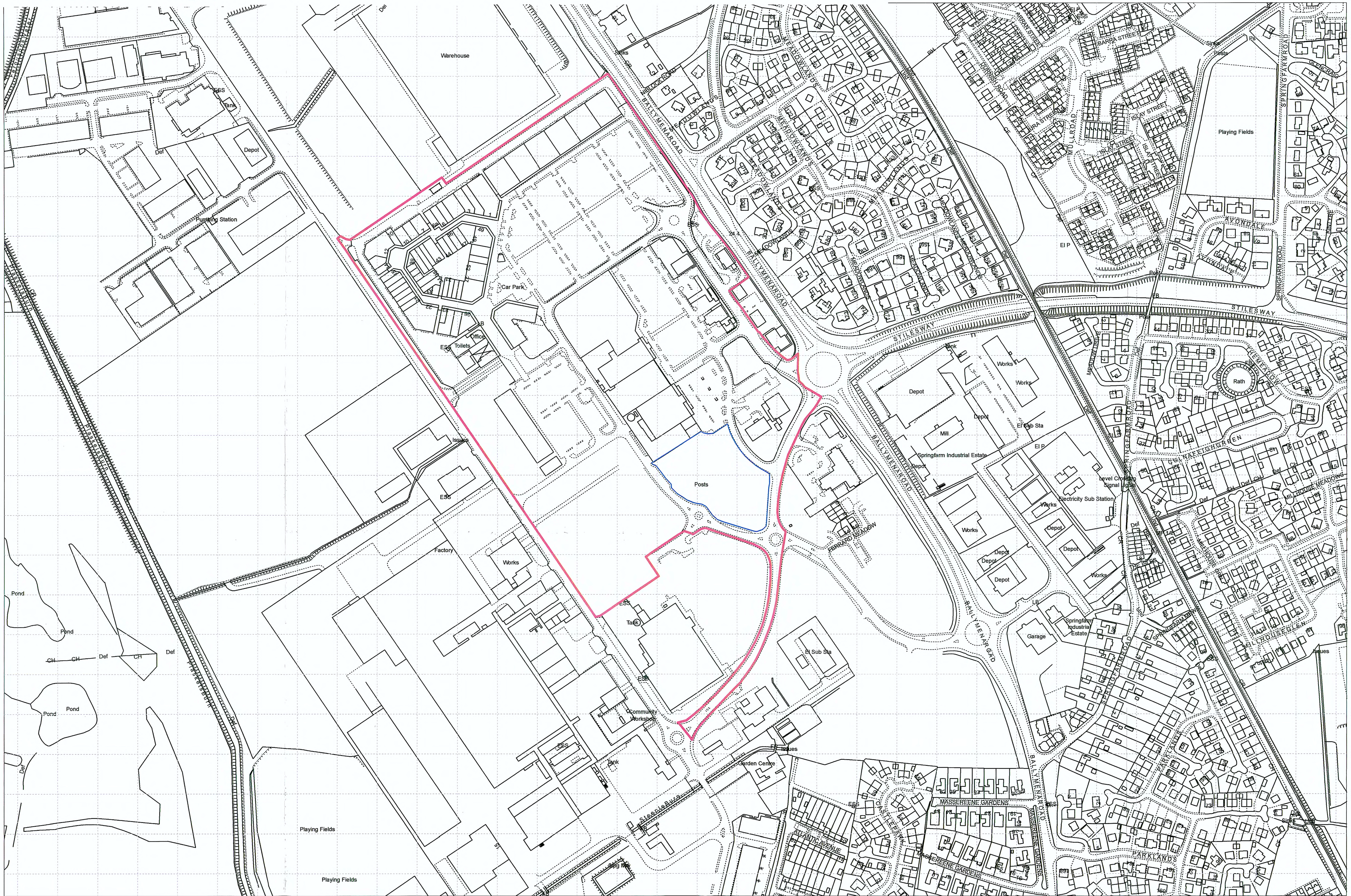
16. Where a Designated watercourse flows through or adjacent to a development site, it is considered essential that a working strip of minimum width 5m is left along the bank in order to facilitate future maintenance of the watercourse by the Rivers Agency. Actual requirement should be determined in consultation with the Agency.

Dated: 14th December 2017 Authorised Offi[redacted]

ACEmap® Single

Centre Point (Easting, Northing): 314173, 388132

JUNCTION ONE INTERNATIONAL OUTLET SHOPPING, TOWNS PARKS, ANTRIM, BT41 4LL, 187377494



NOTE:
All survey information used in this drawing was provided by The Lotus Group. All areas and measurements to be checked on-site.

REV	DESCRIPTION	DATE	INT.

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DESIGN & ARCHITECTURE

NOTE:
All dimensions to be checked on site. This drawing is the sole copyright of Turnerbates and is not to be reproduced without permission.

FOR PLANNING

CLIENT: EPISO 4 ANTRIM S.A.R.L
PROJECT: JUNCTION ONE MASTERPLAN
ADDRESS: 111 Ballymena rd, Antrim, Northern Ireland, BT41 4LL

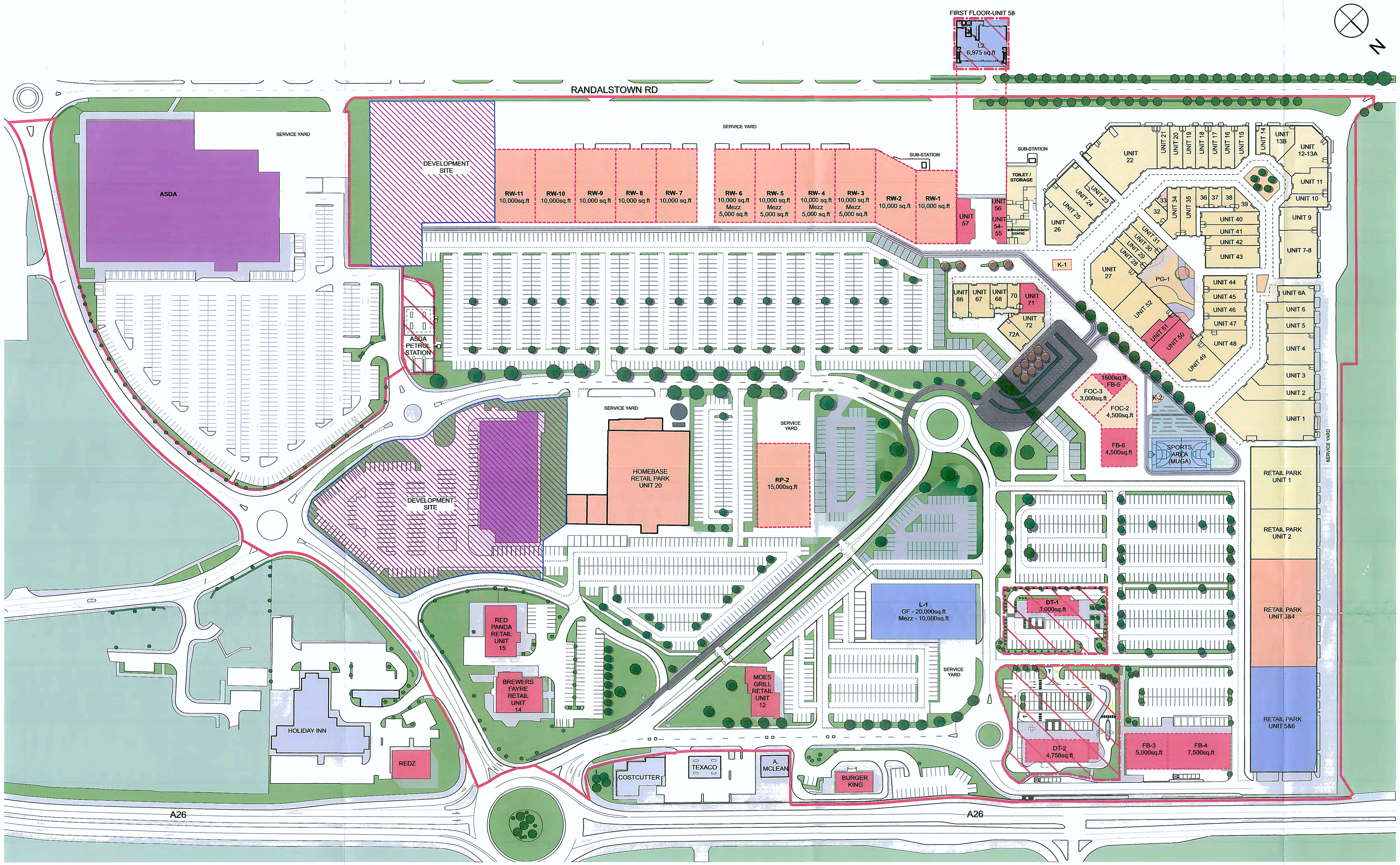
DRAWING: **EXISTING SITE LOCATION MAP**

N

Figured dimensions take precedence over scale dimensions. Contractors must verify all dimensions on site before commencing any work or making shop drawings.

SCALE @A1	DIRECTOR	DRAWN	CHECKED
1:2500	JT	DA	JF

PROJECT NUMBER	DRAWING NUMBER	REVISION
TB_17_1415	P001	00



AREA SCHEDULE - PROPOSED UNITS (GIA)		
Tenant Unit	Area (sqm)	Area (sq.ft.)
Unit FOC-2	418	4,500
Unit FOC-3	279	3,000
Unit RP-2	1,394	15,500
Unit L1	2,787	30,000
Unit FB-3	465	5,000
Unit FB-4	697	7,500
Unit FB-5	149	1,600
Unit FB-6	418	4,500
Unit RW-1	929	10,000
Unit RW-2	929	10,000
Unit RW-3	1,394	15,000
Unit RW-4	1,394	15,000
Unit RW-5	1,394	15,000
Unit RW-6	1,394	15,000
Unit RW-7	929	10,000
Unit RW-8	929	10,000
Unit RW-9	929	10,000
Unit RW-10	929	10,000
Unit RW-11	929	10,000
K-1	60	645
K-2	20	220
PG-1	771	8,300

KEY- COLOUR CODES

- NEW BUILDS
- FOOD & BEVERAGE
- ZONE 2A OUTLET
- LARGE RETAIL
- DEVELOPMENT SITE
- LEISURE
- RATIONALISED/ ADOPTED TENANTS
- CONVENIENCE FOOD
- SITE DEMISE LINE

PLANNING APPLICATION SCHEDULE		
UNIT	PLANNING NUMBER	DATE
DT-1 + DT-2	LA03/2017/0014/F	28/04/17
GYM L2	LA03/2017/0018/F	26/04/17
ASDA PFS	LA03/2017/0192/F	01/06/17

KEY

PLANNING APPLICATION SITES

Planning Act (NI) 2011
Antrim and Newtownabbey Borough Council
GRANTED
Subject to Conditions (if any) as set out on
Decision form No. LA03/2017/0234/O
Date 14-12-17

LA03 / 2017 / 0234

Drawing Number 05/1

Planning Section RECEIVED 10 OCT 2017 File No.

NOTE:
All survey information used in this drawing was provided by The Lotus Group. All areas and measurements to be checked on-site.

REV	DESCRIPTION	DATE	INT.
01	REVISED NOTATION AND SCHEDULES IN LINE WITH CLIENTS / TSA REQUESTS	12.09.17	DA

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DESIGN & ARCHITECTURE

NOTE:
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FOR PLANNING

CLIENT: EPISO 4 ANTRIM S.A.R.L
PROJECT: JUNCTION ONE MASTERPLAN
ADDRESS: 111 Ballymena rd, Co. Antrim Northern Ireland BT41 4LL

DRAWING: PROPOSED MASTER PLAN

Figured dimensions take precedence over scale dimensions. Contractors must verify all dimensions on site before commencing any work or making shop drawings.

SCALE @A1	DIRECTOR	DRAWN	CHECKED
1:1250	JT	DA	JF

PROJECT NUMBER	DRAWING NUMBER	REVISION
TB_17_1415	P010	01