

## Belfast LDP 2035 - Plan Strategy

13.11.2018

### Overview

### Part 1 of 2

We're developing the new Local Development Plan (LOP) which is the land use plan for Belfast up to 2035. The Plan will guide investment and set out policies and proposals for the use, development and protection of land across the city. Once adopted the plan will be used to determine planning applications. It will take approximately four years to develop and formally adopt the new LOP.

A series of consultation stages are built into the process for creating the LOP and are defined by legislation to help local people input into this Plan. We are currently undertaking the second stage of the consultation process in relation to the draft Plan Strategy.

Your opinions matter to us and we want to hear from you during the various stages throughout the preparation of the plan. While you can provide feedback using this form, we encourage you to use our online questionnaire via the Council's Consultation Hub at:

<https://yoursay.belfastcity.gov.uk/>. The consultation closes on 15th November 2018.

### What is the LDP?

The LOP:

- Guides development
- Provides certainty and a framework for investment
- Facilitates sustainable growth
- Puts communities at the heart of the process
- Allows for speedier decision making under the new plan-led system

### How will this impact on me?

Our LOP will have an impact on everyone who lives, works and visits Belfast because it will shape how the city will develop in the future. Your views are important so we'd like you to get involved in its preparation.

### What is the Plan Strategy?

The Plan Strategy will be a strategic policy framework for the plan area as a whole across a range of topics. It will set out an ambitious but realistic vision for Belfast as well as the objectives and strategic policies required to deliver that vision. Establishing this strategic direction early in the plan process will provide a level of certainty on which to base key development decisions in the area as

well as the necessary framework for the preparation of the Local Policies Plan. You can find out more about the Plan Strategy, and access all relevant documents, on the Council's website at: [www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP).

## **Accessibility**

The relevant documents are available, on request, in alternative formats - Braille, audio, large print, easy read. The council will also consider requests to produce it in other languages. If you require the documents in these or other formats please contact us:

Belfast Planning Service

Belfast City Council

Cecil Ward Building

4-10 Linenhall Street Belfast

BT2 8BP

Telephone: 028 9050 0510

Email: [\*\*localdevelopmentplan@belfastcity.gov.uk\*\*](mailto:localdevelopmentplan@belfastcity.gov.uk)

## A. Data Protection

Belfast City Council is the Data Controller under the General Data Protection Regulation (GDPR) for the personal data it gathers for the purposes of sending regular email updates on the Local Development Plan from Belfast Planning Service.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the independent examination process.

The council accepts that you are providing your personal data on the basis of consent and are positively agreeing for the council to hold and further use it, publish it (without personal information such as name and email, but will include organisation). Belfast City Council must also share it with the Department for Infrastructure and whoever they appoint to undertake the independent examination.

Any personal details that you provide the Council will be handled in accordance with the GDPR and Data Protection Act 2018. As such we will only use your data for the purposes that you have given this information for and will only be shared where necessary to provide the service that you are contacting us about. If you would like further information in regards please see the website [belfastcity.gov.uk/about/privacy](http://belfastcity.gov.uk/about/privacy)

The personal data is held and stored by the council in a safe and secure manner and in compliance with Data Protection legislation and in line with the council's Records Retention and Disposal Schedule.

If you wish to contact the council's Data Protection Officer, please write to:

Belfast City Council,  
City Hall Belfast,  
BT1 SGS

or send an email to [records@belfastcity.gov.uk](mailto:records@belfastcity.gov.uk)

**Q1.** Please tick to confirm that you have read and understood the privacy notice above.

(Required)

- I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

**Q2.** Do you consent for us to publish your response?

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Even if you opt for your comments to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the inspectorate they appoint to oversee the examination in public into the soundness of our plan. This will be done in accordance with the privacy statement above.

(Required)

*Please select only one item*

- Yes, with my name and/or organisation  
 Yes, but without my identifying information

## B. Your details

**Q3.** Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

(Required)

*Please select only one item*

Individual *(Fill in the remaining questions in this Section, then proceed to Section C)*

Organisation *(Fill in the remaining questions in this Section, then proceed to Section D)*

I'm an Agent *(Fill in the remaining questions in this Section, then proceed to Section E)*

**Q4.** What is your name?

Title

First Name (Required)

Last Name (Required)

**Q5.** What is your telephone number?

Telephone number

**Q6.** What is your email address?

Email

**Q7.** Did you respond to the previous Preferred Options Paper consultation phase?

(Required)

*Please select only one item*

Yes     No     Unsure

If yes, and you have your previous response ID (beginning ANON) please enter it here:

## C. Individuals

If you are responding as an individual, please complete this Section, then proceed to Section E

Q8. What is your address?

Address Line 1 (Required)

Line 2

Line 3

City (Required)

Postcode (Required)

## D. Organisation

If you have selected that you are responding as an organisational respondent, there are a number of pieces of information that we are legally required to gather from you.

**Q9.** If you are responding as a representative of a group or organisation, please complete this Section, then proceed to Section E

Organisation (Required)

Your Job Title (Required)

**Organisation address (if different from above):**

Address Line 1 (Required)

Line 2

Line 3

City

Postcode (Required)

## E. Agents

If you have selected that you are responding as an agent on behalf of other people/organisations, there are a number of pieces of information that we are legally required to gather from you.

**Q10.** Please provide details of the organisation or individual you are representing:

The name of the organisation or individual you are representing: (Required)

### Client contact details:

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

Line 2

Line 3

City

Postcode (Required)

Telephone number (Required)

Email address (Required)

**Q11.** Would you like us to contact you, your client or both in relation to this response or future consultations on the LOP?

(Required)

*Please select only one item*

Agent     Client     Both

## F. Is the plan sound?

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

**Q12.** Do you consider the Plan Strategy to be sound or unsound?

(Required)

*Please select only one item*

I believe it to be sound (*Proceed to Section G*)

I believe it to be unsound (*Proceed to Section HJ*)

## G. Sound

**Q13.** If you consider the Plan Strategy to be sound and wish to support the Plan Strategy, please set out your comments below, then proceed to Section t

(Required)

**Note:** If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

## H. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

**Note:** If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

**Q14.** To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

**8.2 Retail & 8.1 Inclusive Economic Growth**

Policy (if relevant)

**RET 1, RET 2 & RET 3 & ECG**

**Q15.** If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6, available at:  
<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

*Please select all that apply*

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 - Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- C1 - Did the council take account of the Regional Development Strategy?

- C2 - Did the council take account of its Community Plan?
- C3 - Did the council take account of policy and guidance issued by the Department?
- C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
- CE1 - 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
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 - It is reasonably flexible to enable it to deal with changing circumstances

**Q16.** Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

**See Attached Sheet**

**Q17.** If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

**See Attached Sheet**

**Note:** If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

## **L Type of Procedure**

Q19. Please indicate if you would like your representation to be dealt with by:  
(Required)

*Please select only one item*

- Written representations (Choose this procedure to have your representation considered in written form only.)
- Oral hearing (Choose this procedure to present your representation orally at the public hearing event(s))

Unless you specifically request a hearing, an independent examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note however that an independent examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

# Belfast Local Development Plan

## Response to the Preferred Options Paper

Ref: [REDACTED]

Client: [REDACTED]

### Part 2 of 2

**Q16.** Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

#### Summary of POP Arguments

1. We submitted an objection to the POP. The summary of our key concerns were:
  - there was very little new information provided on District Centres (beyond that already known in dBMAP), and we were concerned that there is a perception that District Centres compete with Belfast City Centre. We disagree with this suggestion in that there is a strong case for both District Centres and the City Centre as the two perform very different roles;
  - retailers that seek to have more than one store in the City would be required to look to locate in the City Centre at the expense of District Centres;
  - work is needed to understand how District Centres can complement the City Centre and the research is heavily focused on the City Centre;
  - no Retail Capacity Study had been prepared;
  - retail centres should be allowed to grow to match the ambitious targets in population growth in the LDP;
  - growth in the City must be spread around the City;
  - some District Centres are not and never have performed a District Centre function. Others are over performing as a “District Centre” and Kennedy Centre should be classed as a Major District Centre;
  - the approach in the POP has followed the restrictive approach set out in draft BMAP. The ambitious growth in the LDP is refreshing, but that ambition should be applied to retail generally and in particular retail in key District Centre and the City Centre;

- the sequential test should be refined to incorporate District and Major District Centres;
- boundaries of District Centres should be reviewed;
- the Retail Capacity should assess the demand in District Centre catchments and assess whether non-retail uses should be managed.

### **Review of Belfast Retail & Leisure Capacity Study 2035**

2. Before considering the Draft Plan Strategy, we would comment on the Belfast Retail & Leisure Capacity Study 2035 prepared by Braniff Associates. It is vitally important that the Council's Retail Capacity Study is challenged as in future when the Council looks for guidance on 'objectively defined needs' when assessing planning applications, it will look to the findings of the Council's own Study. If the Study is inadequate, it has the potential to undermine retail investment in the future.

#### *Hierarchy*

3. The retail hierarchy set out at Section 3.2 of the Report keeps the same hierarchy as exists now. There is no new centres identified, and no expansion of centres predicted and no centres downgraded. This is not an objective assessment of future need, it simply envisages that the status quo of centres that emerged in the 1970s-1980s will persist into 2035. If there is no need to consider the requirements of the retail hierarchy and no scope of alteration, then there is little point in including it within the LDP at all. The Council ambitious population growth is unfortunately not being matched by an ambitious retail strategy and retail hierarchy.
4. This stagnant approach is in direct contrast to the historical intervention of planning in the regeneration of the Titanic Quarter or the Laganside project. These are good examples of plan led mixed use development. It was driven forward by a strategic vision for Belfast. Belfast needs a similar ambitious approach to address the current and future retail challenges not least from the changes that have arisen as a consequence of online shopping which changed shopping patterns of people for good. Planning has wholly failed to engage in what the role and function of our centres are in the face of the increasingly challenging retail market.

***Use of Empirical Evidence***

5. Section 5 of the Study sets out the results of a 500 person shopper survey. The presentation of these results is noted however, it is clear that the survey has not actually informed the capacity assessment. The SPPS requires the LDP to be informed by robust evidence in relation to need and capacity. The evidence of these surveys has not informed the Capacity Assessment as Section 6 makes no mention of the surveys.

***Capacity***

6. This Study provides an extremely wide range of 'demand' for both convenience and comparison retailing.
7. In one sense the Study finds no need for additional convenience retail floorspace in Belfast by 2035. That is an astounding suggestion and is clearly based on the flawed assumption that spending growth will not increase on food. We would dispute that households will spend the same amount of money on food in 2035 as they do now. There must be a case that consumer willingness to buy cheap food, that has been the trend in recent decades and which has been at the expense of our climate will not always persist. There is a case that in future people will be willing to spend more on sustainably sourced food, and that there is a need for families to spend greater proportion of the household budget on food, rather than on comparison goods. We would have thought such a scenario should have been tested. Instead, it appears that Braniffs have applied two scenarios – apply an off the shelf set of assumptions from Experian that shows little growth by 2035 and apply the Council's ambitious resident only population increase as a basis for estimating available spend.
8. Section 6 makes no estimate of the turnover of Belfast City Centre or any of the Centres in the Council area (never mind the entire catchment area of the City Centre). The failure to use the survey data to inform the Capacity Assessment is a significant gap in the methodology. There is no evidence on whether the Centres are overtrading or undertrading, whether Centres have headroom to soak up future retail capacity, or whether there is a need for additional land to be released through an enlarged City Centre or District Centre boundary to allow Centres that are extremely successful to expand to meet shopper demands. The Study (and by virtue the LDP Strategy) fails

paragraph 6.277 of the SPPS bullets 2 and 5. As there is nothing in the Study to set out the turnover of Centres against a benchmark turnover, it is not possible to define the spatial extent of Town and District Centres or to allocate suitable sites to meet the scale and form of retail need over the Plan period.

9. These are not issues that can be left to the Local Policies Plan (LPP) as the size of the City Centre and the number, location and extent of District Centres must be a strategic matter.
10. A contrast can be made between this Study and the BMAP Retail Study prepared by Colliers. That comprehensive assessment sought to understand the turnover of all centres and was properly informed by empirical evidence.
11. The most telling illustration of the limits of the Study is that it finds there to be a -434 sq m need for convenience retail floorspace in 2035. That means there is less need for retail in 2035 than there is now. We acknowledge that this result is the outworking of the Study approach, but this itself illustrates the mechanistic approach being taken without any judgement being applied to consider whether the assumptions being inputted are actually likely to occur.

*Failure to Consider All Forms of Consumer Spending*

12. In terms of the population estimates employed, the Study Table 6.1 predicts an increase in the population of 56,130. The Strategy 5.1 has a growth strategy of increasing the population by 66,000 and supporting 46,000 additional jobs. The tourism retail spending is a key feature in modern cities like Belfast. The Strategy para 8.4.2 estimates that between 2015 and 2020 value of tourism will double to £870 million. The Capacity Study makes no assumptions in terms of the scale of retail tourism spend and no allowance for it to contribute to the retail demand and capacity over the Plan period. A similar observation can be made in respect of the lack of estimates of spending on retail goods from workers that commute to Belfast every day.

### *Key Messages of the Study*

13. Against the background of either a pessimistic growth scenario of limited growth and an undercooked LDP population estimate the Study sets out the key messages in terms of District Centres under Section 8.2. It suggests (*inter alia*) that they should focus on convenience retailing and that low cost retailers are most resilient. Low cost retailing is a post recession phenomena. It is highly unlikely that by 2035 that discount retailing will continue to dominate the retail market in the way it has since the credit crunch in 2008. The recent closure of Poundworld is evidence that discounters are not as resilient as implied in the Study. Our client would have expected the Study to be more ambitious in defining the role and opportunities that District Centres can play as the heart of their communities in the next 15-20 years.

### *The Purpose of Health Checks*

14. The Study has carried out a health check assessment of the District Centres (section 3.4), and notes the Kennedy Centre is ‘performing well’. It makes no quantitative assessment as to what that actually means. It is our client’s position that a proper assessment should have sought to assess the turnover of the Centres and decide whether some are out performing what might be expected from a District Centre and, indeed that could have supported a case for a different retail hierarchy. Having carried out the health check and found some centres not performing as a District Centre, the follow through must be what will be done to ‘plan’ for that centre’s future. Perhaps its future should be non retailing, perhaps strong centres should be encouraged to develop further. Instead the health checks have been carried out because the SPPS requires them, but there is no end product from it – nothing has changed.

### *Comments on Conclusions*

15. It is concerning that the conclusion 9.21 does not:

- consider alternative retail designations. It persists with City/Town Centres, District Centres and Local Centres only. There is no SPPS definition of “retail centres”. It mentions city, town, district and local centres. However, it does not prohibit alternative centres being defined, and it is a matter for the Council to decide if alternative centres could be defined.

- Provide any comment on Kennedy Centre
- Seeks to persist with the identification of Hillview as a District Centre when it is noted that the current owners are proposing a car showroom and cafes and food outlets.
- Proposes the expansion of Connswater on the basis that Lidl is located outside the shopping centre and provides no comment on the boundaries of any other centre.

#### *Phasing*

16. We would be concerned at the proposed ‘phasing’ suggested in the Study (para 9.22) that the amount of floorspace be *‘monitored against the low floorspace figure identified in the study and when it is reached a review of retail floorspace need is recommended in light of up to date population figures’*. Such an approach would be wholly impractical given the low floorspace figures for convenience goods is already in minus figures if two commitments are built out in Westwood and Boucher. While it is acknowledged that the Study is not part of the Strategy, the fact that the Strategy policies will require any future proposals to be assessed in the context of an up to date Plan, and that Plan has been informed by a Study that finds no need in one scenario, is clearly a concern. Importantly, when it comes to the delineation of sites in the LPP, the fact that the Study finds no need in one scenario of convenience floorspace, would be a further concern as it would constrain future growth of strong centres that may actually need to grow.

#### **Policy Comments**

17. In light of these concerns we turn to the policy aims and policies RET 1, RET 2 and RET 3. We also consider policy EC6 insofar as it relates to District Centres.

#### *Retail Policy Aims*

18. Para 8.2.4, bullet 5 seeks to “provide an appropriate scale of retail and town centre uses in accordance with their scale and role”; and bullet 6 “support local economies by ensuring continued vibrancy and vitality” and bullet 7 “develop a compact urban form that maximizes opportunities in the city centre”.

19. We consider these aims to be **Unsound** because:-

CE2 - The Plan has not been based on a robust evidence base. The Capacity Assessment is deficient for a number of reasons as set out above. The Plan needs to set out aims that subsequent policies can flow from. These aims can only be determined and delivered if a proper Capacity Assessment has been undertaken. The Capacity Assessment provides no objective guidance on which to properly determine the capacity for additional retail floorspace over the Plan period. There is no understanding of the appropriate locations for additional retail floorspace.

## **Section 8.2**

**Policy RET 1 - Establishing a Retail Hierarchy**

**Policy RET 2 – Out of Centre Development**

**Policy RET 3 – District Centres, Local Centres and City Corridors**

and

## **Section 8.1**

**Policy EC6 and supporting text.**

20. These policies are **Unsound** because -

P2 - They do not take account of representations

CE2 - The policies are not realistic given the evidence

21. We say this because:

- Policy RET 1 does not include Major District Centres as we have suggested;
- The policy does not list the proposed centres and only shows an indicative map;
- The policy does not list District Centres and whether existing centres should be down graded to Local Centre or others upgraded to Major District Centres. The evidence is that Hillview and other locations are not functioning as District Centres.

22. The Strategy proposes that the locations of the centres and boundaries should be left until the LPP. The designation of District Centres is a strategic matter and should be dealt with now. The Strategy should be the process of designating which locations are centres worthy of protecting and enhancing based on a robust evidence.

23. There is no justification to delay the identification of District Centres and to continue to apply BMAP designations. These are locations that affect the local communities and are matters that should be addressed at a strategic level.

*Confused Sequential Test Approaches to Policies RET 1; RET 2 and RET 3*

24. The policy of RET 1, RET 2 and RET 3 are confused.

25. RET 1 seeks to set out a hierarchy and a sequential test.

26. RET 2 sets out a Sequential Test for all out of centre development. It does not mention the City Centre. It discusses town centres, when there is no town centre in Belfast. RET 2 does not indicate that permission will be granted if the two tests are met. It simply sets out the tests. It does not interpret the outcome of the policy. It should say that permission will only be granted if the two tests are satisfied. It should say that in terms of impact, no demonstrable harm is caused (or words consistent with the SPPS) or differing if the Council sees fit.

27. RET 3 sets out a further sequential test. It deals with the sequential approach and applies it to District Centres.

28. Three separate policies providing a sequential test is unnecessary and clumsy.

*Policy EC6*

29. There is no cross reference between the retail and the office policy EC6 on floorspace. Policy EC6 allows offices in District Centres. However a cap of 400 sq m is unclear and arbitrary. There is no figures in either the SPPS or PPS 4 that suggests that District Centre should be restricted to 400 sq m of B1 floorspace. If for example Hillview sought an office campus to be provided, it would be impractical to restrict it to 400 sq m; given the ongoing difficulties the Centre has. Equally if Kennedy Centre sought to increase office floorspace, that would boost employment in the area, limiting it to 400 sq m would be unreasonable.

30. The constraint that will prevent Major District Centres and District Centre from competing with the City Centre and other locations for office accommodation will be the physical boundaries of the Major District Centres and District Centres. If a centre does not have physical capacity within or on its edge for a proposal then it will be directed elsewhere. However, the benefits of allowing offices within these centres will include helping to sustain the retail provision, sustainability of linked work and shopping trips and the removal of congestion in the City Centre. It may allow such centres to be the focus for non-retail uses such as is the case in Kennedy Centre with the local job and benefit centre.

31. Furthermore, somewhat surprisingly para 8.1.39 suggests that outside centres proposals for offices over 1,000 sq m will need to satisfy the impact test set out in policy RET 2. This is inappropriate as the impact tests apply to retail use.

**Q17.** If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

32. Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

33. The supporting evidence base of the Retail Capacity Study should be re-worked to be properly informed by the empirical research and that a comprehensive quantitative assessment that reflects the differing consumers, various spending scenarios, benchmarking of centre turnovers and an estimate of actual centre turnovers should be carried out to determine the scale of existing and potential inflow, outflow, over trading and undertrading of centres.

34. The Study should also properly consider the health of existing centres and make meaningful recommendations on their most suitable future role and function

35. Policy RET 1 should set out a clear retail hierarchy based on an objective Retail Capacity Assessment. It should introduce Major District Centre category and include Kennedy Centre as the Major Centre for the West of the City. Reference to the Sequential Test should be defined only in policy RET 2.

[REDACTED]

[REDACTED]

36. It should state:

***RET 1 – Retail Hierarchy***

*The retail hierarchy of Belfast City Council is as follows*

*Regional Centre – Belfast City Centre*

*Major District Centre – Kennedy Centre*

*District Centre – Connswater; Park Centre; Westwood Centre; Cityside*

*Local Centres – Dairyfarm; Hillview; Kingsway; Kings Square*

37. Policy RET 2 should be redrafted to set out the Sequential Test that applies to give the City Centre primacy in attracting regional and sub regional stores, but also allows Major District Centre to be the first choice location for stores that have a narrower catchment; followed by edge of Major District Centre and District Centres and edge of District Centres. RET 2 should set out that proposals outside MDCs should satisfy the two criteria as set out in the policy as currently drafted.

***RET 2 – Sequential Test of Retail Proposals***

*All new retail developments will be required to satisfy the Sequential Test relevant to the nature and scale of the proposal.*

*For proposals with a regional or sub regional catchment, they will be required to locate in Belfast City Centre Primary Retail Core, followed by the edge of the PRC; and the rest of the City Centre as defined.*

*For proposals with a non regional and non sub-regional catchment, seeking to locate in the City Council area but outside the City Centre, these will be directed to Major District Centres, followed by the edge of Major District Centres. Only if these locations are not available, will they be required to locate in District Centres, followed by edge of District Centres*

*Proposals for main town centre uses outside of existing centres must:*

- a. *demonstrate that there is not a sequentially preferable site in, or on the edge of an existing centre, in line with the sequence set out above, and having regard to the criteria of suitability, availability and viability and*
- b. *submit a retail impact assessment and assessment of need for proposals that have a floorspace of 1,000 sq m and above.*

[REDACTED]

[REDACTED]

38. Policy RET 3 should be amended to remove the references to District Centres and deal solely with Local Centres and City Corridors.

39. **Policy EC6** should be reworked as follows:

*Planning permission will be granted for new office development within the City Centre and Major District Centres and District Centres. Delete the words “~~Outside the city centre, and within district and local centres, planning permission will be granted for office development that have a gross floorspace of not more than 400 sq m~~”.*