

Submitted to **Belfast LDP 2035 - Plan Strategy**

Submitted on **2018-11-15 15:23:30**

Overview

1. Data Protection

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

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?

Yes, but without any identifying information

2. 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?

Individual, Organisation or Agent:

Organisation

Q4. What is your name?

Title:

[REDACTED]

Full Name:

[REDACTED]

Q5. What is your telephone number?

Telephone number:

[REDACTED]

Q6. What is your email address?

Email:

[REDACTED]

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

Yes

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

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

[REDACTED]

Your Job Title:

[REDACTED]

Address Line 1:

[REDACTED]

Line 2:

[REDACTED]

Line 3:

[REDACTED]

City:

[REDACTED]

Postcode:

[REDACTED]

6. Before you submit your comments

7. 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?

I believe it to be unsound

8b. Unsound

Q14a. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph::

Retail - Policies RET1, RET2 and RET3

Policy (if relevant):

Q15a. 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:

C3 - Did the council take account of policy and guidance issued by the Department?, 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

Q16a. 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.

Please give your reasons:

1. Policy RET1 does not acknowledge the role of city corridors in the retail hierarchy. Policy RET3 acknowledges the role of city corridors in the retail hierarchy. The latter is consistent with Policy SD2 Settlement Areas which acknowledges the role of city corridors in the city.
2. Policy RET2 states that proposals for main town centre uses outside of existing centres must demonstrate that there is not a sequentially preferable site, in or on the edge of centres. Policy RET2 ignores the role of city corridors which are acknowledged in Policy RET3 as the location of shops performing a local convenience and service role.
3. Policy RET3 identifies a 500 sqm gross external floorspace threshold for individual convenience retail units in local centres without provision of a robust evidence base for this threshold.
4. Policy RET3 requires that retail proposals in a local centre meet a local need (criteria b) and do not adversely affect vitality and viability (criteria c). These are essentially retail need and impact tests. The need test is not consistent with the SPPS which requires an assessment of need in the absence of a current and up-to-date LDP. If a proposal is within a designated local centre in a current and up-to-date LDP, an assessment of need should not be required. The impact test is not consistent with Policy RET2 which establishes a threshold of 1,000 sqm for retail impact assessment. If a proposal is within a designated local centre and less than 1,000 sqm, an assessment of retail impact should not be required.

Q17a. 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.

What would make it sound?:

1. Policy RET1 should include reference to city corridors as local centres within the retail hierarchy to ensure a coherent retail strategy.
2. Policy RET2 should, similarly, include reference to 'centres including city corridors' i.e. 'proposals for main town centre uses outside of existing centres, including city corridors, must demonstrate that there is not a sequentially preferable site, in or on the edge of centres'.
3. Policy RET3 identifies a 500 sqm gross external floorspace threshold for individual convenience retail units in local centres without provision of a robust evidence base for this threshold. [REDACTED] Northern Ireland's largest independent retailer, specialising in convenience and neighbourhood retailing, including petrol filling stations. They own, operate and supply a significant number of facilities across the City Council area. Local convenience shopping supports local suppliers, contributes to local service provision, reduces vehicle trips and establishes more sustainable travel patterns, strengthens local communities, brings life to streets, regenerates city corridors and neighbourhoods, provides local employment (a typical store can provide some 20-30 full and part time jobs) and delivers increased business rates. The convenience retail sector has experienced significant change in recent years which has led to changes in store formats and layout. People expect and value longer opening hours, a fuller grocery offering and a variety of complementary services e.g. post office

counters, paypoint / utility payment facilities, e-commerce delivery mechanisms, food-to-go counters and solid fuel sales. These factors are often essential for commercial viability and have implications for floorspace within a shop. A modern Spar / Vivo store would be 3,000-4,500 sq. ft. approx. net retail floorspace and a Eurospar / Vivoxtra would be 5,500-6,500 sq. ft. approx. net retail floorspace. The threshold proposed in RET3 should be deleted or increased.

4. Policy RET3 criteria b) and criteria c) should be deleted.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?

No

9. Type of Procedure

Q18. Please indicate if you would like your representation to be dealt with by:

Oral hearing