



Retail and Main Town Centre Uses Supplementary Planning Guidance May 2023

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Belfast
City Council



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1 Introduction

1.1 Overview

- 1.1.1 The following Supplementary Planning Guidance (SPG) provides additional advice and guidance specific to retail and other ¹main town centre development. It applies to Belfast local government district and is intended for use by developers, the public and by planning officers in the assessment and delivery of planning proposals.
- 1.1.2 SPG represents non-statutory planning guidance that supports, clarifies and/or illustrates, by example, policies included within the current planning policy framework, including development plans and regional planning guidance. The information set out in this SPG should therefore be read in conjunction with the existing planning policy framework, most notably the Strategic Planning Policy Statement (SPPS) for Northern Ireland and the Belfast Local Development Plan Strategy.
- 1.1.3 This Supplementary Planning Guidance (SPG) provides further detail and clarity on the interpretation of the suite of retail policies set out in the Plan Strategy.

1.2 What will this SPG cover?

- 1.2.1 The key objectives of this SPG are:
- **to set out the council's advice/guidance to provide a consistent basis against which to consider proposals for retail and other main town centre uses in Belfast local government district; and**
 - **to provide greater clarity on the sequential test/approach including suitability, availability & viability; and**
 - **to provide greater clarity on impact assessments & assessments of need for retail and other main town centre uses**
- 1.2.2 Although the guidance contained within this SPG may not cover all site-specific issues that can arise, it covers the main considerations that will be considered when determining a planning application. In general, it is expected that all proposals for retail development will comply with the retail and other main town centre uses policies within the LDP, this guidance document as well as being subject to all other policy requirements. Proposals that comply are more likely to proceed quickly and successfully through the planning process.

¹ Includes cultural and community facilities, retail, leisure, entertainment and businesses.

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- 1.2.3 This is not to say that unconventional or innovative proposals will not achieve planning permission, but where there is departure from the guidance the council will expect detailed justification. In seeking to support the vitality and viability of town centres and the retail offer available, the council will assess each proposal on its own merits.

- 1.2.4 Belfast City Council encourages and welcomes early engagement with applicants to agree the scope of any sequential and/or impact test. Applicants are advised to utilise the council's pre application determination (PAD) scheme to resolve any planning issues and agree the scope of the assessment at an early stage before the submission of a planning application.

2 Policy Context

2.1 Regional planning policy and guidance

Regional Development Strategy (RDS) 2035

- 2.1.1 The Regional Development Strategy 2035 (RDS) recognises the Belfast Metropolitan Urban Area as the major conurbation in Northern Ireland with a thriving retail, service, administration, cultural and educational centre. It further recognises the importance of accessible, vibrant city and town centres which offer people more local choice for shopping, social activity and recreation.
- 2.1.2 The RDS directs a city centre first approach to retail development complemented by a precautionary approach to out of centre developments.

Strategic Planning Policy Statement (SPPS) for Northern Ireland (2015)

- 2.1.3 The Strategic Planning Policy Statement (SPPS), published in September 2015, sets out regional planning policies for securing the orderly and consistent development of land in Northern Ireland under the reformed two-tier planning system.
- 2.1.4 The aim of the SPPS is to support and sustain vibrant town centres across Northern Ireland through the promotion of established town centres as the appropriate first choice location of retailing and other complementary functions, consistent with the RDS.
- 2.1.5 Specifically in relation to retailing and town centres the Strategic Planning Policy Statement (SPPS) requires that; Planning authorities must adopt a town centre first approach for retail and main town centre uses; undertake an assessment of the need or capacity for retail and other main town centre uses across the plan area; and LDPs should include a strategy for town centres and retailing, and contain appropriate policies and proposals that must promote town centres first for retail and other main town centre uses.

2.2 Local planning policy

Plan Strategy

- 2.2.1 The Plan Strategy is the strategic policy framework, for the plan area, across a range of topics. It sets out the vision for Belfast as well as the objectives and strategic policies required to deliver that vision. It also includes a suite of topic-based operational policies, including those relating to retailing and town centres.
- 2.2.2 Primarily, this guidance supplements the following policies:

- RET1: establishing a centre hierarchy, which sets out the districts network and hierarchy of centres and requires proposals for retail and other main town centre uses be directed to the appropriate centres;
- RET2: out of centre development, which requires that proposals for retail and other main town centre uses, outside of centres, demonstrate that they comply with the sequential test and are accompanied by an appropriate impact and needs assessment;
- RET3: district centres, local centres and city corridors, which sets a threshold of 500sqm for convenience and 200sqm for comparison shopping units;
- RET5: primary retail area, which restricts non-retail uses to no more than 40% (and no more than 3 adjacent units) within the primary retail frontages.

2.2.3 Please note for additional guidance relating to relating to main town centre uses which are considered sensitive in nature please refer to the Sensitive Uses SPG. These uses include, pubs and nightclubs, amusement arcades and bingo halls and restaurants.

2.2.4 There are also a range of other relevant policies within the Plan Strategy as illustrated below.

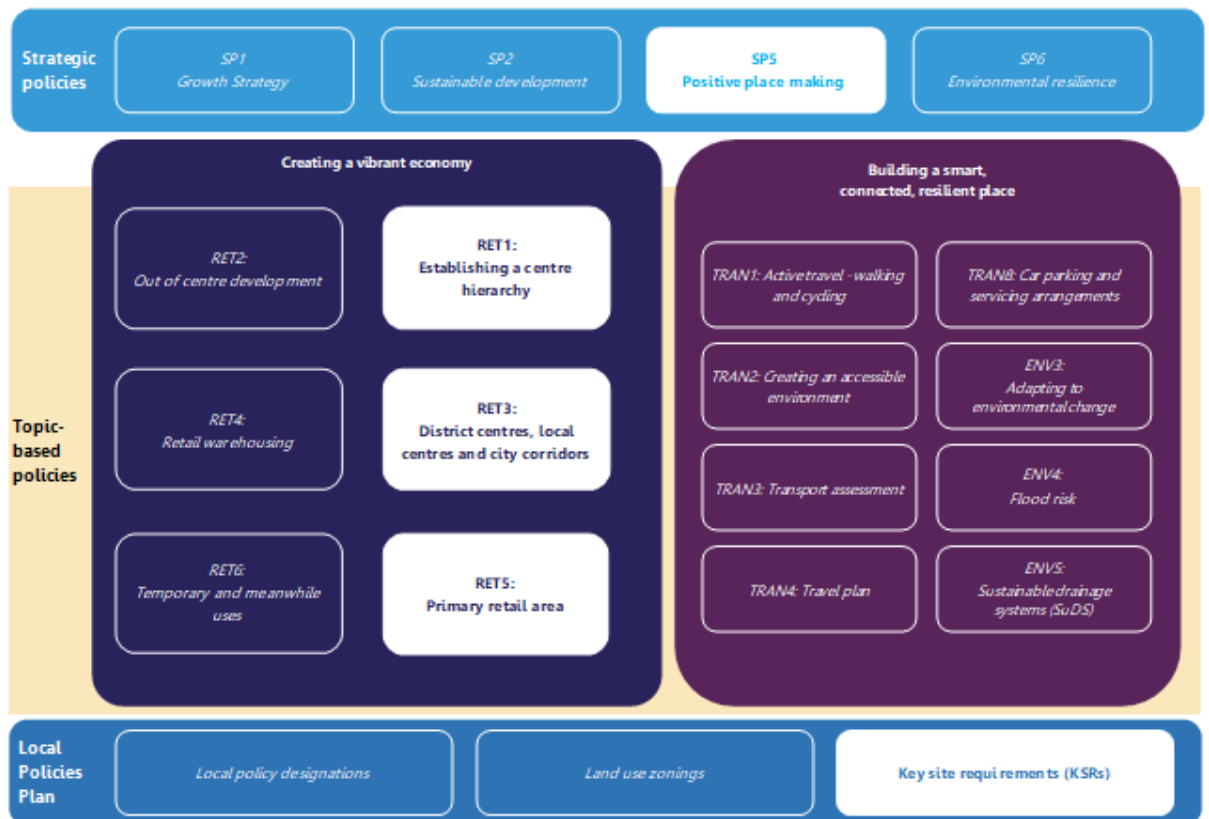


Figure 1: Inter-related policies relevant to retail and other main town centre uses

Local Policies Plan

- 2.2.5 The Local Policies Plan sets out site-specific proposals in relation to the development and use of land in Belfast. It contains the local policies, including site-specific proposals, designations and land use zonings required to deliver the council's vision, objectives and strategic policies, as set out in the Plan Strategy.

3 Issues

3.1 The Sequential Test

- 3.1.1 RET1 and RET2 provide the proposed policy approach in relation to the sequential test for planning applications for main town centres uses, which includes retail.

Policy RET 1 – Establishing a centre hierarchy

...The sequential approach directs development to the town centre before considering an edge of centre site. Preference will be given to edge of centre land before considering an out of centre site.

Policy RET 2 – Out of centre development

Proposal 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 centre having regard to the criteria of suitability, availability and viability.**

What is the sequential test?

- 3.1.2 The sequential test is an approach that directs development within centres before an edge of centre site or out of centre site. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.
- 3.1.3 In the Belfast context, there are no “town centres”, rather a city centre with district and local centres, and therefore for the purpose of this SPG, centres are considered to include the traditional city centre as well as the district and local centres.
- 3.1.4 It is considered that all centres have an important role to play in the provision of services, but the scale and nature of these services will depend on the role of the centre. The Plan Strategy (PS), in line with the Regional Development Strategy (RDS) 2035 seeks to enhance the role of Belfast city centre as the regional capital and support and strengthen its distinctive role as the primary locations for retail and other main town centres uses in Northern Ireland. District centres in the Belfast context are primarily retail led. They are generally located on routes that are convenient and easily accessible to the local community by all modes of travel. They usually contain

at least one food supermarket or superstore, a degree of comparison goods shopping, some retail services, leisure services and business services. The primary purpose of a local centre is the provision of conveniently accessible shopping and services for local communities. They are commonly found on arterial routes and on other main roads. Their catchments are therefore smaller than that of a district centre.

- 3.1.5 The sequential test guides main town centre uses to sites within centres locations first. If no centre sites are available, developers should consider an edge of centre location. Only when centre locations or edge of centre locations are unavailable, can consideration be given to an out of centre location. In such cases the developer will still be required to demonstrate that the proposal will not harm existing centres.
- 3.1.6 For the purposes of clarity, the centres will be defined at LPP stage of the Belfast LDP, but until that plan is adopted the centres defined in draft BMAP 2015 should be used during the transitional period.
- 3.1.7 The sequential test to site selection for main town centre uses will therefore require applicants to consider sites in the following order of preference:
- Belfast city centre's Primary Retail Core (PRC) and Frontage (PRF)²;
 - Belfast city centre (beyond the PRF and PRC)
 - district centres;
 - local centres; then
 - edge of town centre

Applicants should refer to Appendix 2 which sets out the hierarchy and the application of the sequential test in the context of Belfast.



² Preferred location for retail proposals. All other main town centre uses should first consider the city centre in the application of the sequential test provided they fall within the proposal's catchment.

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Figure 2: Sequential approach order.

- 3.1.8 Where it is established that an alternative sequentially preferable site or sites exist within the proposal's whole catchment, an application which proposes development on a less sequentially preferable site should be refused.
- 3.1.9 Compliance with the sequential test however does not guarantee that permission will be granted. The council will have to consider all material considerations in reaching a decision including an assessment of the impact and need of the proposal, if appropriate. Section 3.2 of this document provides further detail on impact and need.
- 3.1.10 Where proposals relate to extensions to existing retail development the sequential test will also be applied. This approach is in line with para 6.281 of the SPPS which does not draw a distinction between new development or extensions to existing stores in the application of the sequential test.

When is a sequential test required?

- 3.1.11 A sequential test should be applied when an application for retail or other main town centre development³ is proposed either in an edge of centre or an out of centre location. This is in line with policy RET2 of the plan Strategy and para 6.280 of the SPPS.
- 3.1.12 The designated centres for Belfast are the city centre, district and local centres as indicated in policy RET1 of the Plan Strategy document, which sets out the network and hierarchy of centres. As detailed in paragraph 3.1.6 the centres defined in draft BMAP 2015 should be used during the transitional period.
- 3.1.13 The sequential approach is intended to achieve two important policy objectives:
- First, the assumption underpinning the policy is that town centre sites (or failing that well connected edge of centre sites) are likely to be the most readily accessible locations by alternative means of transport and will be centrally placed to the catchments established centres serve, thereby reducing the need to travel.
 - The second, related objective is to seek to accommodate main town centre uses in locations where customers can undertake linked trips to provide for improved consumer choice and competition. In this way, the benefits of the new development will serve to reinforce the vitality and viability of the existing centre.

³ Includes cultural and community facilities, retail, leisure, entertainment and businesses

Carrying out a sequential test.

3.1.14 There are 4 key steps to follow when undertaking a sequential test:

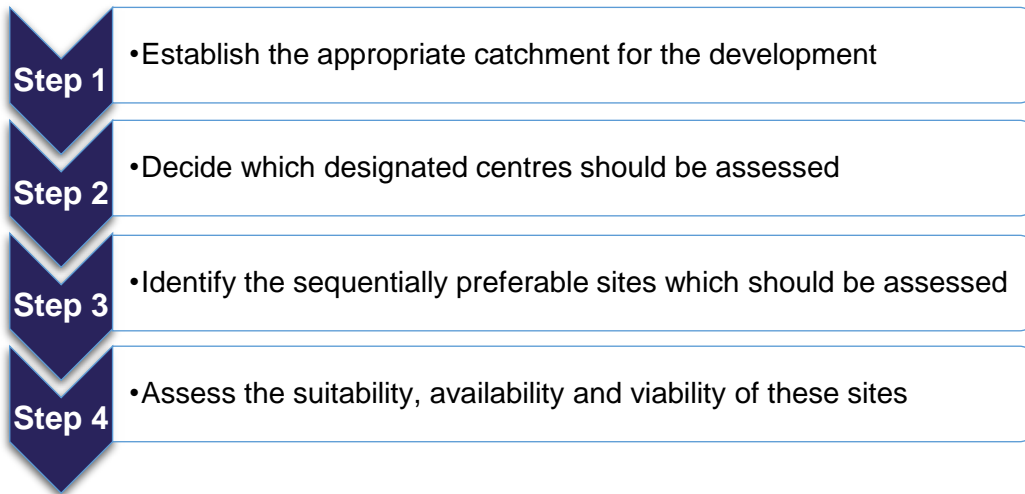


Figure 3: Sequential approach steps

Step 1: Establish the appropriate catchment for the development

3.1.15 The catchment is the area the proposal is intended to serve / draw trade from. This will vary depending on the specific development proposed and will need to take account of the size of development, the market in which the development will operate and any relevant characteristics of the business / operator model.

3.1.16 Catchments should be defined by detailed drive time calculation (which is determined by estimating the catchment served by, for example, a 15 minute drive time). The drive times which are appropriate will depend on the specific development. The council will require a 20-minute drive time catchment for major retail applications of 1,000m² gross floorspace and above. For smaller retail applications below 100m² a reduced catchment of 5-minute drive time will be applied. Catchments may extend beyond the council boundary and it should be noted that they may also include other centres outside of the council boundary.



Figure 4: Catchments across boundaries (for illustrative purposes only)

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Step 2: Decide which designated centres should be assessed

3.1.17 Having established an appropriate catchment, this can then be used to help determine the centres which should be assessed for sequentially preferable sites, in conjunction with details of the type and size of proposed development. The centres to be considered are city centre, district and local centres within the Belfast City Council boundary in the first instance and if the catchment area extends beyond the council boundary, other centres within that catchment.

Step 3: Identify the sequentially preferable sites which should be assessed

3.1.18 The assessment should then consider sequentially preferable sites – i.e. first those within designated centres and then, if these are unavailable, suitable or viable, sites in an edge of centre location.

3.1.19 Establishing whether a proposal is in an edge of or out of centre location will depend on the specific type of development proposed and the site context. In order to maintain the vitality and viability of the city centre the primary retail frontage and core should remain the focus for retail proposals in Belfast. However, an edge of centre location for such proposals would be considered to be within 300m of city centre boundary.

Step 4: Assess the suitability, availability and viability of these sites

3.1.20 The SPPS is silent on a definition of suitability, availability & viability. However, to provide clarity and greater certainty around this aspect of the sequential test the council considers it important to elaborate on these definitions.

Suitability

When judging the suitability of a site it is necessary to have a proper understanding of the appropriateness and likely market attractiveness for the type, scale and form of the development needed, and what aspect(s) of the need are intended to be met by the site(s).

There will also be a requirement to consider flexibility in the format and scale of the development proposed for the city centre and other centres.

The following factors are likely to be relevant when assessing whether a site offers a suitable location for development:

- policy restrictions – such as designations, protected areas and existing planning policy;
- physical problems or limitations – such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts – including effect upon landscape features and conservation; and

	<ul style="list-style-type: none"> the environmental conditions.
Availability	<p>This refers to sites that are available now or are likely to become available for development within a reasonable period of time.</p> <p>A site will be considered available for development when, on the best information available (such as searches), there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners.</p> <p>Where sites become available unexpectedly after receipt of a planning application, the council will take this into account in its assessment of the application.</p> <p>Applicants will be required to submit evidence of any insurmountable legal or ownership problems that renders a site "unavailable".</p>
Viability	<p>This test is concerned with judging whether there is a reasonable prospect that development will occur on a site. This is likely to be influenced by:</p> <ul style="list-style-type: none"> market factors – such as adjacent uses, economic return of existing, proposed and alternative uses in terms of land values, attractiveness of the locality and level of potential market demand; cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and delivery factors – including the developer’s own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), Section 76 costs, whether there is a single developer or several developers and their size and capacity etc.

Figure 5: Definition of suitability, availability and viability

3.2 Retail Impact Assessment & Assessment of Need

Policy RET 2 – Out of centre development

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

Submit a retail impact assessment and assessment of need for proposals that have a floor area of 1,000 sqm gross and above.

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- 3.2.1 For the purposes of this policy, developers will be expected to submit a Retail Impact Assessment (RIA) for retail proposals and alternative impact assessment for other main town centre uses. Whilst the primary objective of this policy is to protect centres it is acknowledged that retail uses have distinct features or attributes which require bespoke assessments.
- 3.2.2 Overarching regional policy and Policy RET2 of the Plan Strategy requires that retail impacts be assessed with respect to all main town centre uses outside existing centres. Retail impact assessments are relevant to retail proposals. Other main town centre uses (including leisure/entertainment, offices, arts, culture and tourism) will also require impact testing. These "alternative" impact assessments are required to gauge the potential impacts of proposals for main town centre uses, outside existing centres, on the vitality and viability of existing centres i.e. Belfast City Centre and the District and Local Centres. The scope and detail of the impact assessments will need to be agreed by the council prior to submission.
- 3.2.3 Paragraph 6.283 of the SPPS gives councils the flexibility to set an appropriate threshold for their area, above which all applications for retail or town centre type developments should be accompanied by an assessment of retail impact and need. This threshold can be up to, but must not exceed, 2500m² gross external area.
- 3.2.4 In the Belfast context it is considered that a threshold of 1000m² was appropriate because of the likely impact that out of centre shops of that scale would have in an urban context due to the proximity of nearby centres. Anything above this could have the potential to cause significant adverse impacts on the vitality and viability of Belfast's hierarchy of centres.
- 3.2.5 Policy RET 2 therefore identifies that proposals for retail or other main town centre uses of 1000m² gross or above, on the edge of or outside of designated centres, must be accompanied by an impact assessment and an assessment of need. This should consider:
- the impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and
 - the impact of the proposal on the vitality and viability of centres, including local consumer choice and trade.
- 3.2.6 Whilst the council acknowledges that there are a number of different methodologies to carry out a Retail Impact and Assessment of Need, the council's preferred method is the Step by Step approach. This approach identifies the catchment of the proposal by drive time and the trade draw within each drive time band. The council considers this approach to be more transparent and easier to assess as opposed to other

methodologies including the market share approach which lacks transparency and may result in longer processing times due to the complexity of the assessment.

What is an impact assessment?

- 3.2.7 An impact assessment is a methodologically evidenced based approach to determine the relative effect that a proposed development will have on the wider centre hierarchy. The purpose of the impact assessment is to consider the impact over time of certain out of centre and edge of centre proposals on designated centres vitality, viability and investment. The test relates to retail and main town centre uses which are not in accordance with up-to-date plan policies and which would be located outside existing centres. It is important that the impacts assessed relate to all the centres within the proposal catchment designated centres, and not necessarily just those closest to the proposal. The affected centres may be within neighbouring authority areas and these need to be assessed.
- 3.2.8 The impact test is useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of particular centres.
- 3.2.9 It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could constitute a reason for refusing permission.
- 3.2.10 The impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Ideally, applicants and the council should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted.

When is an Impact Assessment required?

- 3.2.11 Depending on the size and location of the proposal applicants may be required to submit either an Impact Assessment and/or Assessment of Need. The following table is intended to assist applicants in determining which assessment(s) is required for their retail and other main town centre use developments.

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■ Assessment not required
 ✓ Assessment required

Location	Retail Core			
Size of proposal	1,000gsm or more	500-1000 gsm	0-500 gsm CV	0-200 gsm CP
Sequential test				
Impact Test				
Needs Test				

Location	City Centre			
Size of proposal	1,000gsm or more	500-1000 gsm	0-500 gsm CV	0-200 gsm CP
Sequential test				
Impact Test				
Needs Test				

Location	District Centre			
Size of proposal	1,000gsm or more	500-1000 gsm	0-500 gsm CV	0-200 gsm CP
Sequential test				
Impact Test	✓			
Needs Test	✓			

Location	Local Centre			
Size of proposal	1,000gsm or more	500-1000 gsm	0-500 gsm CV	0-200 gsm CP
Sequential test				
Impact Test	✓	✓		
Needs Test	✓	✓		

Location	Edge of Centre			
Size of proposal	1,000gsm or more	500-1000 gsm	0-500 gsm CV	0-200 gsm CP
Sequential test	✓	✓	✓	✓
Impact Test	✓			
Needs Test	✓			

Location	Out of Centre			
Size of proposal	1,000gsm or more	500-1000 gsm	0-500 gsm CV	0-200 gsm CP
Sequential test	✓	✓	✓	✓
Impact Test	✓	✓	✓	✓
Needs Test	✓	✓	✓	✓

Figure 6: Determining whether an impact and/or needs assessment is required

Note: All measurements above relate to external space i.e. Gross Square Metres (gsm).

Scope of Impact Assessment

- 3.2.12 Consideration will be given to whether the impact of a new out-of-centre development could undermine the viability and contribution of schemes in more sequentially preferable locations or prejudice the potential to secure further development on a more central site.

- 3.2.13 In undertaking an impact assessment, the council will seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted. The basis of any assessment will normally consider potential impacts on designated centres within the catchment area identified as part of the sequential test. In line with best practice impact should be considered over time: up to five years for most schemes, or up to ten years for major schemes.
- 3.2.14 Where proposals relate to a specific type of goods (for example, a DIY retail warehouse) it may be appropriate to focus the impact assessment on that specific sector, notwithstanding the need to consider the impact of the proposal on the overall vitality and viability of centres.
- 3.2.15 If unconditional consent is sought for retail or other uses (for example, with no limitation on net sales area, unit sizes, range of goods and so on) then the supporting assessment should examine all of the potential impacts and policy compliance of the full range of possible permutations which would be permitted under the proposed planning permission.
- 3.2.16 In assessing the impact of the proposal on existing, committed and planned public and private investment, consideration should be given to a range of factors including:
- What stage they have reached e.g. are they contractually committed?
 - The policy 'weight' attached to them (for example, are they a key provision of the development plan?)
 - Whether there is sufficient 'need' for both?
 - Whether they are competing for the same market opportunity, or key retailers/occupiers?
 - Whether there is evidence that retailers/investors/developers are concerned; and
 - Whether the cumulative impact of both schemes would be a cause for concern.
- 3.2.17 Where the catchment extends into other council areas, the council may ask for input from the relevant neighbouring council(s) in identifying factors which should be taken into account in any assessment, and providing any relevant information, such as monitoring data, retail and leisure studies, or town centre health check data.
- 3.2.18 The council's most recent retail and leisure capacity study should provide a starting point to inform any impact assessment.
- 3.2.19 A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances (for example, in areas where there are high

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levels of vacancy and limited retailer demand, trade diversion from a new development may lead to a significant adverse impact).

- 3.2.20 Evidence showing that there would be no likely significant impact on a centre from an edge of centre or out of centre proposal does not guarantee that permission is granted. The council will have to consider all material considerations in reaching a decision including the sequential test and need, if appropriate.

3.3 Methodology for Step by Step Approach

Step 1: Identification of the Catchment Area

- 3.3.1 The identification of the catchment area, and the proportion of trade drawn from this area, is an important stage in the RIA and it will directly affect the assessment of trade diversion from competing centres and retail impact. If the proposal is to be situated outwith a centre or at an edge of centre site, the applicant must consider the likely catchment of the proposal with reference to travel distances determined from survey of comparable facilities elsewhere in the district. If no comparable facilities are located within the Belfast City Council area, then comparison should be considered for facilities elsewhere in Northern Ireland.
- 3.3.2 In addition to determining the catchments of the adjacent centres, the catchment area needs to be sufficiently wide enough to ensure that the influence of the proposal can be assessed.

Step 2: Determine the appropriate time frame for assessing impact, focusing on impact in the first five years (up to design year):

- 3.3.3 The base year for impact testing should generally be selected to represent the year when the proposal application has been submitted.
- 3.3.4 The design year for impact testing should be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after opening of each phase of a new development, but it may take longer for some developments to become established.

Step 3: Examine the 'no development' scenario:

- 3.3.5 This should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and should reflect both changes in the market or role of centres, the impacts of online shopping as well as changes in the environment such as new infrastructure. The effects of wider trends therefore need to be considered.
- 3.3.6 Longer term trends and local market dynamics are likely to indicate that some retail destinations are going to improve while others decline, irrespective of the proposed

planning interventions. Therefore, further considerations need to be considered in examining the “no development” scenario.

Commitments/cumulative impact

- 3.3.7 Applicants must consider the effect of known commitments and consider the cumulative impact of the proposals in question.
- 3.3.8 In judging which commitments should be considered, it will be relevant to consider, inter alia, the likelihood of them being implemented, and their potential scale and significance. The basic approach to assessing the impact of commitments, i.e. the key stages of the exercise, are set out later in this section.
- 3.3.9 In the case of proposals which are not in accordance with an up to date local development plan and not within an existing centre, their effects on a planned investment in a nearby centre may be highly material. The range of factors to be considered are detailed at para 3.2.15 above.
- 3.3.10 Equally, any adverse impacts as outlined above should be balanced against the positive effects of the proposals, in terms of; investment; employment generation; social inclusion; and physical and economic regeneration.

The ‘fall-back’ scenario

- 3.3.11 The second consideration is the so called ‘fall back’ scenario, i.e. where through an extant permission or permitted development rights it is argued that there is a ‘fall back’ position which may be implemented if the current proposal is not accepted.
- 3.3.12 It is possible in some cases that a specific proposal may have a lesser impact than the proposal for which consent is being sought. Alternatively, an application might provide the opportunity to impose planning restrictions which could mitigate impact. However, in judging the relevance of a ‘fall back’ position, the following factors should be considered:
- First, the relevance of a fall-back position should be judged having regard to the likelihood of it being implemented. There is a difference between a purely ‘hypothetical’ fall-back position, and a position which could be implemented. If there is a realistic prospect that the fall-back position would be brought forward, then it would be appropriate to attach significant weight to it in judging the impact of the proposal in question.
 - Second, when comparing the impact of a proposal with a fall-back position, it will be relevant to consider the impact of the proposal as a whole (together with other known commitments – see above), rather than just the ‘incremental’ impact of the difference between the two. This applies to all

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impact assessments, where the relevant test is the cumulative impact of the proposal in question.

Step 4: Assess the proposal's turnover and trade draw:

- 3.3.13 This can be achieved by drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw.

Step 5: Consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities:

- 3.3.14 This may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact (for example, by drive-time band). This may also require inclusion of committed developments within the catchment area (proposals that have gained planning permission and can therefore be developed).

Step 6: Set out the likely impact of the proposal, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues:

- 3.3.15 Any conclusions should be proportionate, for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres.

3.4 Needs Assessment

What is an assessment of need?

- 3.4.1 An assessment of need identifies the needs of consumers and the requirements of retailers, leisure operators and others proposing development for main town centre uses. Consideration should be given as to whether there is a need / whether there is capacity for a proposed development within the catchment area. In line with best practice assessment of need should be considered over time: up to five years for most schemes, or up to ten years for major schemes.
- 3.4.2 The SPPS states that when undertaking an assessment of need, this should be proportionate to support the application and may incorporate a qualitative and quantitative assessment of need taking account of the sustainably and objectively assessed needs of the local town and take account of committed development proposals and allocated sites.
- 3.4.3 The basis of any needs assessment will normally consider the proposed expenditure growth of the council area and quantum need for floorspace, minus the floorspace required for committed developments.

- 3.4.4 Where proposals relate to a specific type of goods (for example, a DIY retail warehouse) it may be appropriate to focus the needs assessment on that specific sector, notwithstanding the need to consider the impact of the proposal on the overall vitality and viability of town centres.
- 3.4.5 If unconditional consent is sought for retail or other uses (for example, with no limitation on net sales area, unit sizes, range of goods and so on) then the supporting assessment should examine all of the potential capacity of possible permutations which would be permitted under the proposed planning permission.
- 3.4.6 The council's most recent retail and leisure capacity study should provide a starting point to inform any needs assessment.
- 3.4.7 A needs assessment duplicates the steps for assessment of impact in terms of:
- Identification of catchment area, base and design years for the assessment.
 - Identification and projection up to design year of population and total available expenditure within the catchment area.
 - Estimation of turnover and trade draw of centres within the catchment.
 - Estimation of the proposal's turnover and trade draw.
 - Estimation of capacity within the development to include committed developments.

3.5 Office Impact Assessments

- 3.5.1 There is a policy presumption in favour of directing larger offices towards city centre and a sequential test should apply to proposals for office development not located within an existing centre or designated area. As offices fall under the definition of main town centres uses as set out the SPPS an impact and need test must be considered for development proposals that are in excess 1000m² (External space i.e. Gross Square Metres) and are located within an out of centre location.
- 3.5.2 Offices play a significant role in the defining of Belfast city centre's economic function. They help to generate footfall and support vitality and viability and regional policy seeks to ensure that Belfast city centre will continue as the primary office location in Northern Ireland.
- 3.5.3 For offices proposals above a threshold of 1000m² that are to be located outside a designated centre applicants will be expected to demonstrate that it will not either by itself or in combination with other committed development proposals, will not have a

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significant adverse impact on investment of the vitality and viability of Belfast city centre or other centres within its catchment.

- 3.5.4 In terms of need proposals above a threshold of 1000m² that are located in an out of centre location will be expected to demonstrate why there is a specific locational requirement why their business must be located within that particular location and not within a designated centre.
- 3.5.5 To date, the focus of impact assessments has been on retail proposals, particularly the key town centre impacts.
- 3.5.6 In the case of offices, it is unlikely that several the key impacts set out in policy will be directly relevant (e.g. trade diversion). In such cases, applicants should seek to agree with the council which key impacts will be focused on. There may be cases, for example, where a key town centre site is earmarked for a new office quarter, which depends on securing key occupier requirements, where there is legitimate concern that a new development will cause displacement and/or deflect occupier demand to a less central location.
- 3.5.7 In every case it will be necessary to reach a balanced decision, having regard to the provisions of the development plan, the sequential approach and impact considerations.

3.6 District centres and local centres

Policy RET 3– District centre, local centres and city corridors

Beyond the city centre a district centre first approach will apply to proposals for major retail development and other town centres uses.

District Centres

- 3.6.1 In the Belfast context district centres are generally all purpose-built shopping locations. They are intended to provide for a critical mass of retail, service and leisure provision and perform the following functions:
- In terms of retailing, they provide a sizeable convenience goods offer in the form of a supermarket or superstore for local shopping needs.
 - They afford an opportunity to provide for a fair element of comparison goods shopping beyond the City Centre.
 - They also allow for related retail service and leisure service uses to develop at the location.

- 3.6.2 As district centres are the next level below the city centre in the centre hierarchy for Belfast, the policy seeks to ensure that major retail proposals for such development are directed to these locations.

Policy RET 3– District centre, local centres and city corridors
Within local centres planning permission will be granted for a proposal for retail development provided that:

- a. Any individual unit created (including by extension) does not exceed 500sqm gross external for convenience or 200sqm gross external for comparison shopping;**
- b. The proposal meets a local need or deficiency;**
- c. The proposal would not adversely affect the vitality and viability of centres in the catchment;**
- d. It would complement and not alter the role and function of the centre or route; and**
- e. It would be easily accessible by foot, creates linkages and connections to improve accessibility.**

Local Centres

- 3.6.3 Local centres comprise of small group of shops, typically a newsagent, small supermarket/general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population.
- 3.6.4 Local centres are positioned below district centres in the centre hierarchy for Belfast. Policy RET 3 sets out a number of criteria that development proposal must comply with.
- 3.6.5 The restrictions set out under criterion (a) seek to ensure that the size of both convenience and comparison units reflect their position within the overall hierarchy of centres and do not adversely impact the vitality and viability of existing centres within the council area. Criterion (b) seeks to ensure that there is an identified local need for a proposal. This should consider population trends including whether there has been and is likely to be an increase in the population within the catchment. It should also consider whether there are any comparable types of shops within the catchment and if the retailer is already represented within it.

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- 3.6.6 In respect to criterion (c) & (d), applicants will be expected to demonstrate that there is no adverse effect on the vitality and viability of centres in the catchment and that the proposal would complement and not alter the role and function of the centre. Whilst it is not expected for applicants to submit a full RIA, some detail will be required in order to satisfy these criteria.
- 3.6.7 In terms of the requirement for accessibility and linkages set out in criterion (e), local centres tend to serve a small, localised population. Therefore, it is critical that proposals ensure accessibility is incorporated into the overall design to ensure that all sections of the community are adequately catered for.

3.7 Primary Retail Area

Policy RET 5 – Primary Retail area

No more than 40% of the frontage of the shopping street to which it relates is in non-retail use and no more than 3 adjacent units are in non-retail use.

Non-retail development includes financial and business services and leisure services. In respect of this policy the 40% non-retail threshold excludes proposals for restaurant and café use.

- 3.7.1 RET 5 sets a threshold that no more than 40% of the primary retail frontage (PRF) and no more than 3 adjacent units should be in non-retail use. The 40% threshold includes vacant units that were last in retail use and do not have an extant permission for non-retail use.

Acceptable: 40% of frontage in non-retail use



Acceptable: 3 adjacent units in non-retail use



Not acceptable: More than 40% of frontage in non-retail use



Figure 7: 40% non-retail threshold

Not acceptable: More than 3 adjacent units in non-retail use



- 3.7.2 Whilst restaurant's and café's are considered to be sui-generis uses as they have no use class specified within The Planning (Use Classes) Order (Northern Ireland) 2015, for the purposes of this policy the non-retail threshold excludes proposals for restaurant and café use. This approach seeks to allow a degree of flexibility and recognises the synergy between retail use and restaurants and cafes.

Appendix 1: Glossary of terms

Centre(s) -	Refers to Belfast city centre, district centres and local centres which provide a broad range of facilities and services and which fulfil a function as a focus both for the community and for public transport.
Convenience goods -	Mainly groceries and other consumable commodities that are purchased regularly and usually locally. They include food, drink (including take home alcohol), tobacco, newspapers, magazines, cleaning materials and toiletries.
Comparison goods -	Durable items for which customers are prepared to travel some distance in order to compare prices and quality. They include clothes, footwear, household durables, textiles, fashion accessories, toys, hardware and leisure goods.
Comparison goods (bulky)	This is a subset of comparison goods retailing. It describes those comparison goods which are difficult to accommodate in town centres because of their space requirements for large showrooms, parking and servicing. They typically include large items such as furniture, carpets, electrical/white goods and DIY goods, and are typically sold from retail warehouses.
District Centre -	Large grouping of shops separate from and subordinate to the town centre. They are generally located on routes that are convenient and easily accessible to the local community by all modes of travel. They usually contain at least one food supermarket or superstore, a degree of comparison goods shopping, retail services, leisure services and business services.
Edge-of-centre -	For shopping purposes, a location within easy walking distance (i.e. 300 metres) of the City Centre, District Centre or Local Centre.
Expenditure forecasts -	Assessments of future expenditure based on applying stated growth rates which are not necessarily projections of past trends.
Gross retail area –	This is the total retail floorspace, as measured from inside the retail unit and includes sales space, storage space and ancillary space, including offices, toilets, canteen and circulation space.
Leisure services -	Largely refers to the following uses: Restaurant/cafe/fast food takeaway (eating out); Public houses/bars/clubs (socialising with a drink); cinema, theatres and concert halls (entertainment); betting offices, gaming centres, bingo

(partaking in a game of chance); gyms, leisure centres, swimming venues (recreation) and hotels & guesthouses – availing of accommodation.

- Local centre –** Location typically comprising a general grocery store, a sub post office, hairdressing/beauty salon, café, hot food takeaway, pharmacy and other small shops of a local nature. The primary purpose of a local centre is the provision of conveniently accessible shopping and services for local communities.
- Local shops –** These refer to individual retail outlets or small groupings of local businesses that are generally located on roads and in residential areas that connect with arterial routes.
- Main Town Centre uses -** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)
- Net retail area –** This is also referred to as sales space and includes the area of the unit which is devoted to the display and sale of retail goods. It includes checkout counters, packing zones, circulation space from check-outs to exit lobby, changing rooms and information areas. Net retail floorspace is calculated by way of internal measurement to the inner face of the wall.
- Out-of-centre -** A location outside a centre boundary but within defined development limits.
- Out-of-town -** A location outside defined development limits of settlements.
- Population projections -** Estimates of future population based on the most recent census and/or NISRA populations estimates, and applying NISRA population trends
- Prime Retail Frontage –** Designation of the busiest shopping streets that normally contain the prime pitches, where conversion to non-retail uses will not normally be permitted at ground floor level.
- Retail Core –** Designation of the largest concentration of shopping within a centre and may encompass areas which afford opportunities for retail-led regeneration.

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Retail warehouse -	Large single-level individual store, with car parking, for the sale of bulky comparison items such as DIY goods, furniture, electrical goods, carpets and gardening goods.
Retail warehouse park -	Agglomeration of at least three retail warehouses.
Supermarket -	Self-service store selling mainly food, with a gross retail floorspace of less than 2500 square metres, often with its own car parking.
Superstore -	Self-service store selling mainly food, or food and non-food goods, with a gross retail floorspace of more than 2500 square metres, with car parking.
Town/City Centre -	Town/City centres comprise a mix of facilities which perform a broad range of functions relating to retail, leisure, commercial, tourism, residential, community and civic use. At the focus of a transportation network the City Centre affords the population convenient access to a wide range of services.
Town Centre Health check -	<p>Town centre health checks are an important starting point to ensure the vitality and viability of town centres are maintained/improved. Town Centre Health Checks are carried out by the council and its outcomes are fed into the assessment of impact of proposals on the vitality & viability of town centres.</p> <p>Applicants should make themselves aware of the existing/current health check for town centres as this information will be used by the council when assessing your application. Health checks will be carried out biennially and published on our website.</p>
Trade Draw -	Trade draw is the proportion of trade that a development is likely to receive from customers within and outside its catchment area. It is likely that trade draw will relate to a certain geographic area (i.e. the distance people are likely to travel) and for a particular market segment (e.g. convenience retail). The best way of assessing trade draw where new development is proposed is to look at existing proxies of that type of development in other areas.
Viability Assessment -	A viability assessment should include the land/site value as a key consideration as to whether development is economically viable. In order to determine applications a realistic understanding of the costs and the value of the development in the local area, as well as the prevailing market conditions,

should be submitted. The timing of the assessment will be dependent on the nature and scale of the development proposed.

Vitality & Viability -

Vitality is a measure of how busy a centre is, and viability is a measure of its capacity to attract ongoing investment for maintenance, improvement and adaption to changing needs. Although no single indicator can effectively measure the health of a town centre, the use of a series of them can provide a view of performance and offer a framework for assessing vitality and viability. Some or all of the indicators can be used

Appendix 2: Retail Hierarchy and Sequential Approach

Centre Type	Policy Approach
Primary Retail Core and Frontage	Preferred location for all retail proposals
Belfast City Centre	Preferred location for all other main town centre uses and other significant footfall generating developments service a city-wide or regional market
District Centre	Preferred location for all main town centre uses where the catchment covers the district centre and there are no suitable or available sites within the city centre* <i>*Provided that the city centre is within the proposal's catchment</i>
Local Centre	Preferred location for all main town centre uses where the catchment covers the local centre and there are no suitable or available sites within the city centre or district centres* <i>*Provided that the city centre and district centre(s) are within the proposal's catchment</i>
Edge of centre	Only in exceptional circumstances or when there are no suitable or available sites within the city centre, district centres or local centres

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