



RetailNI

Standing up for
Independent Retailers

Mr Keith Sutherland
Development Planning & Policy Manager
Belfast Planning Service
Belfast City Council
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Belfast
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14th November 2018

By Post & Email

Dear Mr Sutherland

Re: Consultation on Belfast City Council Draft Plan Strategy

We welcome the opportunity to respond to the Council's Draft Plan Strategy consultation and can confirm we have considered the document in full. Some parts are more relevant than others, so where we have adopted a neutral stance, we have indicated that we are supportive of the Council's approach.

Introduction, District Profile & Policy Context

Retail NI has no comments to make in respect of this Section as it outlines the context, structure and process.

The Vision, Aims & Objectives

Retail NI has previously provided commentary at the POP stage regarding the Vision, Aims and Objectives, which are broad and overarching themes that interrelate and accord with the principles of Sustainable Development. The emphasis is evening distributed and they will be achieved through the more detailed policy tests that follow.

Strategic Policies

Retail NI has no comments to make in respect of the specific policies contained within this Section and supports the Council's approach.

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Spatial Development Strategy

Retail NI has no comments to make in respect of the specific policies contained within this Section and supports the Council's approach.

Shaping a Liveable Place

Retail NI has no comments to make in respect of the specific policies contained within this Section and supports the Council's approach.

Creating a vibrant economy

We agree that the planning process is a key enabler for sustainable economic growth. However, implementation cannot be delivered by the Council alone and requires a collaborative approach between the private sector, public sector, local communities and investors.

A shift in the balance towards the private sector through inward investment is critical to delivering Policy SP1 - Growth Strategy.

Policy EC1 – Delivering inclusive economic development

It is suggested that the sixth bullet is reworded as follows:

- Retail, Hospitality and Tourism

These sectors are interrelated, so it is logical to group them as they drive footfall and sustain and enhance not only the identity, but the vitality and vibrancy of Belfast.

Whilst it is accepted that retail is a dynamic function and is in heavy decline, it still represents a significant area of employment and given recent events, is an extremely valuable business sector to the City.

Policy EC2 – Employment land supply

The evidenced-based approach is logical and enables informed decisions regarding the allocation of employment land where there is capacity, demand and accessibility.

It is unsurprising that there is a significant oversupply of employment space, as appears to be a common theme in the previous Development Plans. The adjustment to reflect the actual uptake rates over the past 3 years is sound.

As part of the ongoing monitoring it may be appropriate to phase the ongoing supply to encourage a sequential approach to existing vacant floorspace and other committed developments, as this would be more sustainable. It is also likely they will be at strategic positions close to infrastructure.

Policy EC3 – Major Employment and strategic employment locations

We support the approach and thrust of the policy and would reinforce that any proposed alternative "sui generis" use would need to be complementary to the existing employment uses, so that there are no compatibility issues or harm to established businesses.

Alternative uses must not be introduced which would preclude or inhibit the future expansion or continuation of industrial and warehousing type uses. Evaluative planning judgement will be required, as to what constitutes a “suitable” use, paying regard to established legal principles.

Policy EC4 – Loss of zoned employment land

We are fully supportive of the overall approach to protection of zoned employment as it ensures an adequate supply of suitable land at a variety of locations. However, the period of 18 months is relatively short and could easily be circumvented to seek alternative uses. This would lead to a diminution in zoned employment land at specific key locations. A period of 24 months would be more robust in respect of marketing zoned employment land.

Policy EC5 – Industry and storage and distribution uses

We are fully supportive of the wording and approach of Policy EC5, which provides clarity and flexibility for established businesses.

Policy EC6 – Office Development

Retail NI is supportive of the thresholds proposed to limit the amount of office development outwith the City Centre and that a sequential approach and needs assessment will be applied to larger office schemes >1,000sqm. The additional flexibility to provide for small office floorspace in District and Local Centres will sustain and enhance their vitality and viability. It also considers specific areas, where offices will be required, paying regard to the existing use and location. The approach appears sound and logical as it promotes office development within the City Centre as the primary, which will act as a catalyst to growth and help achieve the wider Strategic Policies.

Policy EC7 – Higher education institutions

Belfast continues to have a highly educated and skilled workforce which will assist in enabling economic growth and inward investment. It is pleasing to see a specific policy has been created to enhance Belfast’s educational institutions and its position as a world leader in higher education.

To ensure the best talent is obtained, companies may seek to be located near the institutions that produce it, which may encourage inward investment and a requirement for office development at these locations.

Retail

There are a considerable number of issues facing Northern Ireland’s towns and cities, which were identified in the GL Hearn Report produced for the DOE in January 2014. The findings advocated a stronger policy stance on protecting and enhancing town centres, which was adopted in the subsequent SPPS.

Retail NI is extremely supportive of Belfast City Centre and policies that sustain and enhance its role as the primary retail location in Northern Ireland. A sequential approach is critical to underpinning Belfast’s success as a retail destination whilst preventing adverse impact from any potential counter-attractions.

In this regard the use of the word “will” at paragraph 8.2.2 is not sufficiently robust and we would seek it is replaced with “must”, which is a mandatory approach and offers stronger protection.

A compact city with improved permeability will enhance cohesion, whilst preventing retail sprawl. It is accepted that retail parks act as a counter-attraction to the City Centre and do not support linked trips or reduced car travel.

Policy Aims

Retail NI has no comments to make in respect of the Policy Aims and supports the Council's broad expressions, which will be facilitated through the more detailed policy tests that follow.

Policy RET1 – Establishing a centre hierarchy

We endorse the classification of a hierarchy of centres and the four-tier model based on their size, function and catchment, as it ensures the correct distribution across the Council area and will limit the need for travel.

Likewise, the sequential order of preference is accepted and consistent with the SPPS and established approach to the retail hierarchy. We accept that physical constraints should be used as defensible boundaries to contain retail development and sprawl.

The provision of local centres and services will reduce the need for travel and promote social interaction for the ageing members of society; such services are the life blood of neighbourhoods and accessible.

Policy RET2 – Out of centre development

The first line of the policy headnote should be adjusted to reflect that the approach relates to the location of new (future) main town centre uses outside of existing centres. The insertion of the word "New" at the outset will ensure there is no ambiguity, as clearly existing stores have invested at existing locations and are in an established trading pattern.

It is pleasing to see a strong focus on the evidence base in the accompanying J&A text, so that applications will be fully considered in the current context. Perhaps it may be appropriate to define the parameters of an assessment of need in the Glossary.

Policy RET3 – District centres, local centres and city corridors

Retail NI agrees that beyond the City Centre a district centres first approach is acceptable. However, consideration will need to be given to the overlapping catchments with other town centres, which would be sequentially preferable locations. In order to ensure there is no negative impact on other town centres, a floorspace threshold should apply for proposals in district centres of 750sqm where additional evidenced-based assessments must be submitted, so that the impacts can be considered. This would pay regard to the district centres' complementary role, scale and function in the wider retail environment.

The inclusion of thresholds for local centres is prudent as it ensures that their scale and function is appropriate to their location, both in the hierarchy and to provide localised services to the community. A retail capacity study will assist in identifying areas of retail deficiency and enable a proportionate response based on qualitative and quantitative need.

Policy RET4 – Retail warehousing

Permitting limited convenience floorspace of 300sqm to meet a local quantitative need is appropriate and will reduce the need to travel.

Any applications for sub-division or amalgamation of existing comparison floorspace should be carefully considered as whilst a single application on its own may not lead to a significant diminution or harmful effects, the cumulative impact and precedent could be significant.

Policy RET5 – Primary retail area

The up-to-date Retail Capacity Study for the City should have consideration of how vacant units could potentially be amalgamated to attract large multi-national retailers in the City Centre. It should also highlight where they are concentrated and what factors are contributing to the vacancy. This will enable an understanding and promote active retail frontages, drive footfall and protect the vitality and viability from competing non-retail uses.

The regeneration and reuse of existing buildings and previously development land, enables a review of the amount, size and location of future units. This can influence the future supply, so that a mix of floorspace can be provided in locations that would align with retailer profiles and requirements.

Policy RET6 – Temporary and meanwhile uses

The flexibility to enable “pop up” shops in vacant units, events or annual festivals will assist with promoting an area and in sustaining a centre’s vibrancy. An operating unit should always be preferable to a vacant unit, which undermines investor confidence and does nothing to enhance the vitality and viability.

Temporary uses create opportunities for start-up businesses to obtain visibility and traction in their infancy, whilst creating cohesion in areas where it has been lacking. Whilst we are supportive of the approach to bring vacant buildings into positive use, we agree that safeguards need to be implemented to ensure the overall retail function will not be undermined. In respect of criterion (f) perhaps it would be wise to re-assess the circumstances and impacts after one calendar year, rather than placing a blanket backstop on the use.

City centre

Retail NI has no comments to make in respect of the Policy Aims and supports the Councils broad expressions, which will be facilitated through the more detailed policy tests that follow.

Policy CC1 – Development opportunity sites

The policy framework seeks to guide development to specific areas or quarters and to provide certainty for investors. Whilst it is difficult to bring forward large scale Masterplans, the re-use of existing sites and buildings is actively encouraged. It may be appropriate to issue “a call for sites” and seek to match business profiles with existing sites. This may result in a stimulus to encourage new economic development and regeneration of existing underutilised sites.

Development around the fringes of the city will assist with the wider desire to have a compact, accessible city whilst supporting economic growth. Planning agreements and developer contributions can be used to facilitate development where the overall benefits can be realised and to mitigate against the effects in those neighbourhoods and communities where sites exist.

Tourism, leisure and culture

Retail NI has no comments to make in respect of the Policy Aims and supports the Council’s broad expressions, which will be facilitated through the more detailed policy tests that follow.

Policy TLC 1 – Supporting tourism leisure and cultural development

This form of development results in an inflow of expenditure from outwith the Region. The creation of significant tourism destinations and increase focus in culture, arts, live music scene and sports creates identity and vibrancy and provides a purpose for visiting and staying in the City.

The promotion of events or annual festivals will attract tourist, along with a high-quality public realm. A diverse mix of activities will enhance the area as a destination and encourage growth of both local, regional and overseas visitors. The wider the offer, the longer the duration of a visit and resultant higher associated revenue. Retail NI is fully supportive of the approach outlined in Policy TLC1 and an integrated tourism strategy.

Policy TLC 2 – Existing tourism leisure and cultural facilities and assets

Retail NI has no comments to make in respect of this specific policy and supports the Council's approach, which considers evidence-based exceptions to provide flexibility.

Policy TLC 3 – Overnight visitor accommodation

Improving the supply and diversity of overnight visitor accommodation is vital in achieving the overall policy aims relating to a growth in tourism, leisure and culture. The highest concentration of accommodation must be provided in the City Centre to drive footfall and ensure accessibility to visitor attractions. This transient population will strengthen the economy through expenditure and will assist with sustaining and enhancing the vitality and vibrancy of the City. The policy retains flexibility as it allows for additional accommodation on a site-specific basis to address any deficiency.

Policy TLC 4 – Evening and night-time economy

We agree with the direction to strengthen and enhance the evening and night-time economy. It is the "twilight" (evening) economy that needs focus, so that people stay in the city and this naturally leads to a night-time economy. The development of a cultural, arts and live music scene creates identity and vibrancy, which gives people a purpose for staying in the city. Likewise, encouraging offices to be located in the city centre will also drive footfall and activity.

Building a smart connected and resilient place

Retail NI has no comments to make in respect of the specific policies contained within this Section and supports the Council's approach.

Promoting a green and active place

Retail NI has no comments to make in respect of the specific policies contained within this Section and supports the Council's approach.

Delivery

It is imperative that the new LDP system remains responsive and flexible, as many of the previous Development Plans lacked the ability to adapt to dynamic changes and shifts in consumer demands, which are occurring at a much faster pace. Monitoring was also not undertaken and therefore the existing plans and the policies became ineffective in some instances.

The plan must be reactive to localised market dynamics and external market forces to ensure the Strategic Objectives are met. The introductions of clear indicators/triggers are a very effective

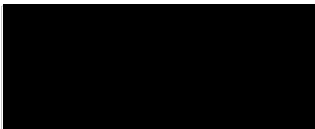
way to necessitate corrective action and will enable adjustments to policies to ensure consistency, clarity and evaluative planning judgement.

Glossary

The inclusion of a Glossary of terms is very helpful and it is noted that it is comprehensive in respect of the retail definitions. However, the lines between distinct market segments in the convenience shopping sector have started to blur in the last 5 years with a rise in value discounters taking an increase market share from traditional multi-national foodstore operators. The Glossary does not include the term "Discount Retailer" and given this clear shift, it would be prudent to include it.

If you would like to discuss the content of this letter in more depth then please do not hesitate to contact me and I look forward to receiving future consultations as the LPD process progresses.

Yours sincerely



Glyn Roberts
Chief Executive
Retail NI

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