

Overview

Part 1 of 2

We're developing the new Local Development Plan (LDP) 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 LDP.

A series of consultation stages are built into the process for creating the LDP 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 LDP:

- 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 LDP 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.

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

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

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 5GS

or send an email to 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:

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 LDP?

(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 H*)

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 I:

(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

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

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Relevant Section or Paragraph

7.1 Housing

Policy (if relevant)

HOU 1, HOU 2, HOU 3, HOU 4, HOU 5

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>

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(Required)

Please select all that apply

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- 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?
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- 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.

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Relevant Section or Paragraph

7.2 Urban Design

Policy (if relevant)

DES 2

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(Required)

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Relevant Section or Paragraph

7.3 Residential Design

Policy (if relevant)

DES 2

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(Required)

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Relevant Section or Paragraph

7.4 Built Heritage

Policy (if relevant)

BH3

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Relevant Section or Paragraph

8.1 Inclusive Economic Growth

Policy (if relevant)

EC6

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Relevant Section or Paragraph

8.2 Retail

Policy (if relevant)

RET 3

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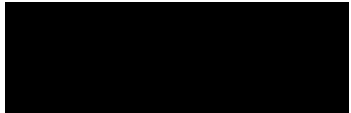
I. Type of Procedure

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

Please select only one item

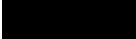
- Written representations (Choose this procedure to have your representation considered in written form only.)
- Oral hearing (Choose this procedure to present your representation orally at the public hearing event(s))

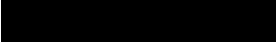
Unless you specifically request a hearing, an independent examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note however that an independent examiner will be expected to give the same careful consideration to written representations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



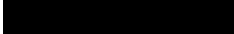
Belfast Local Development Plan

Response to the Preferred Options Paper

Ref: 

Client: 

Part 2 of 2

1. This submission sets out the comments by  on
 - 7.1 Housing
 - 7.2 Urban Design
 - 7.3 Residential Design
 - 7.4 Built Heritage
 - 8.1 Inclusive Economic Growth
 - 8.2 Retail
2. For ease of the Council, we provide our comments on each of these topics separately below under the responses to Questions 16 and 17.
3. Our client would request an oral hearing to discuss these issues.
4. As background, our client is a major land holder in Belfast and has a number of development sites that are likely to be developed in coming years. They have large development sites along the main arterial routes, Boucher and Belfast City Centre.
5. Our clients have not made a response to the POP.
6. Our clients consider the following sections of the Draft Strategy to be **Unsound**.

Section - 7.1 Housing

Policies – HOU 1, HOU 2 HOU 3 HOU 4 and HOU5

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.

7. We note the Council has a significant aspiration for the delivery of 31,660 housing over the plan period under **policy HOU1**.
8. This is an ambitious target, which we would welcome. However, we recognise that the Council considers that the delivery of these houses will come mostly from zoned housing land and that the windfall allowance is very modest at 2000 units or 6.3%. As a numerical exercise in understanding potential capacity for housing, having an allowance for windfall is appropriate. However **policy HOU 2** takes the windfall consideration further and introduces the presumption in favour of housing within zoned housing lands. That is reasonable. However what is unreasonable, is the assumption or perceived assumption that windfall should be deterred or curtailed, and that there is a potential that if a site is not zoned for housing, and the Council could demonstrate that 2000 windfall units were built, that additional windfall sites may not be allowed as there is a moratorium or cap on windfall sites.
9. This approach would remove flexibility in the Plan. The Plan needs to assume that, if for any reason the zoned housing lands are not able to come forward in the annual rates predicted (or at all), that windfall sites could provide an important contribution for housing supply in the Council area over the Plan period.
10. Indeed the SPPS page 72 notes that *“Windfall potential is central to the assessment of future housing land requirement and is a key element of the urban capacity study. Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period. In line with the objectives of the RDS it is necessary to make a full allowance for this when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land. The scale of windfall housing allowance will vary from area to area ... The methodology used should be robust and care should be taken to avoid under-estimation of windfalls”*.

11. The approach to constrain windfalls is contrary to the SPPS, as there is no need for a specific policy allowance for windfalls and there is no need to suggest in the plan that windfall sites will be kept to a minimum. As the SPPS states, windfall allowance varies from area to area. In rural areas, windfall sites will have a lower role than greenfield extensions. However, in the City of Belfast, where most housing will come from previously developed small sites, windfall development will be a key contributor. The Housing Technical Supplement para 4.13 and Figure 10 shows that *“in Belfast’s case, historically the vast majority of housing units were delivered on unzoned land – likely resulting from the delay in adopting BMAP, meaning there was a significant undersupply of zoned land through the BUAP”*.
12. This highlights a fundamental difference in the approach to the Plan. One of the criticisms of BMAP was that it was simply too big and unwieldy. It sought to be a ‘blueprint’ plan which was too rigid and did not have adequate flexibility. It resulted in unprecedented levels of objection, and a prolonged public inquiry and adoption period. Without windfall allowance housing development in the City would have created a major problem.
13. The Council’s approach is again to prepare a ‘blueprint’ plan, except this time to specifically curtail windfall sites. Our clients are concerned that in the first instance, if there is a delay in the subsequent Local Policies Plan (LPP), which will have to designate sufficient sites to provide 29,660 units there could be shortage in housing land. Many of these sites would in normal circumstances be treated as windfall sites. There will be an evitable debate and challenge to sites and the Plan will be delayed. If anything occurs the Council will need to rely on windfall housing.
14. One of the benefits of draft BMAP was that windfall sites were estimates in background material, but policy did not seek to curtail delivery of windfall lands.
15. Indeed policy HOU 2 is titled “Windfall Housing” when it should be a policy dealing with zoned housing land. It does not need to provide any comments on the need to prioritise zoned housing land over unzoned land. That is already clear by zoning. The policies criterion for non zoned land is not of assistance either as the criteria are general development control matters that would be covered in any planning application – i.e. the site being suitable for housing will be determined through the

[REDACTED]

[REDACTED]

application; all sites in Belfast are generally accessible, especially if they are brownfield lands; additional infrastructure would be a matter of negotiations in any application.

16. The Council's attempt to curtail windfall housing is misplaced and has potential to produce a plan that is unwieldy and inflexible and unsound.
17. **Policy HOU 3** seeks to retain existing residential stock. This policy has no caveats that would reflect the quality of residential accommodation. Many development sites remove dwellings to increase density on a site. It is difficult to see how the Council will deliver 31,660 dwellings in Belfast on brownfield land where there is a presumption to retain all housing stock irrespective of quality or its ability and design to meet modern living standards. Moreover, this policy refers to the need for lands fronting a city corridor, for development to be complementary to surrounding residential uses and have no adverse effects on residential amenity. Again, this is unnecessary and duplicates RD 1 policy.
18. Furthermore, planning permission is not required for demolition of buildings. The policy is in direct conflict with the law.
19. **Policy HOU 4** deals with density of housing, and states that city corridor density shall be 100-175. There are examples of established residential density along city corridors of between 250 and 300 dph. The policy on density should not be prescriptive and should include additional allowance for increasing the density if the area already displays higher density.
20. Furthermore, designation of City Corridors are a strategic matter, and the plan should be clear about which roads are City Corridors. Stakeholders may not be objecting to the Strategy on the basis that the Council have left strategic issues to the LPP, and when the LPP comes forward, stakeholders will seek to object to density at a time when the density issue has been already adopted. This could prejudice stakeholders involvement in the Plan. The City Corridors should be designated in the Strategy and discussed now and the density criteria debated. To have a density criteria for a notional corridor 'within the inner city' but no understanding of where that corridor is, is not an appropriate approach to this issue.

21. The SPPS paragraph 6.143 states that *“the development plan process will be the primary vehicle to facilitate any identified need by zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing”*. The Council’s blanket approach for all sites over 5 units to provide affordable housing is not supported by the SPPS. **Policy HOU 5** which requires the provision of affordable housing of 20% in sites of over 5 units is a blunt approach to delivery of affordable and social housing and is concerning policy as it has the potential to make development and delivery of housing unviable.

22. The approach should be dealt with in the LPP where sites are debated and social/affordable housing can be included in the key site requirements of zoned housing land. That approach, would allow developers to argue for density ranges that allow a viable development to come forward.

23. Consistent with our views on policy HOU 5, **policy HOU 6** refers to HOU 5 and the need to provide a mix of affordable housing under housing policy. This reference in policy HOU 6 should be removed.

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.

24. We suggest the following changes to the Plan Strategy:

25. Policy HOU 1 – delete allowance for windfall housing element and delete para 7.18, and replace with the following text:

“Windfall housing will provide an important element of housing need over the plan period and will contribute to the Council meeting its housing targets. Proposals for windfall housing will be assessed on their merits”.

26. Policy HOU 2 should be retitled as HOU 2 – Zoned Housing Land. It should delete reference to windfall housing and should simply state:

[REDACTED]

“There is a presumption that all new housing development within the plan area will normally be delivered on previously developed land within the existing urban footprint. Land will be zoned within the local policies plan in accordance with this principle”.

27. Paragraph 7.1.12 – 7.1.14 should be updated to reflect the above.

28. Policy HOU 3 should be deleted.

29. Policy HOU 4 needs to:

- a. have higher density allowances for City Corridors to between 250-300 dph;
- b. define which City Corridors exist;
- c. define where the inner city boundary is; and
- d. include map showing these designations.

30. Policy HOU 5 should be deleted as it is inconsistent with the approach set out in the SPPS. It should be replaced by text stating that *“Affordable housing will be addressed in the LPP. Where a need exists in an area, as part of the designation of specific housing sites, that process will also involve provision of key site requirements within which a proportion of a site may be required for social/affordable housing”*

31. Policy HOU 6 needs to have the following words deleted in the final sentence of the policy - *“as well as an appropriate mix of tenures under affordable housing policy”*



Section - 7.2 Urban Design

Policies – DES 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.

32. Policy DES 2 seeks to require major development to comply with master planning principles. The policy does not define major projects. PPS 7 only requires a concept masterplan for developments over 300 units. The Planning (Development Management) Regulations (Northern Ireland) 2015 defines major development as being over 50 units or over 2 hectares. Clearly a site that has a high density and provides over 50 units could be on a narrow urban footprint, with density achieved in height of the development. Opportunities for master planning are limited in such schemes. The policy should be clarified as to when this policy applies. It is likely that a larger site hectare as opposed to unit numbers would facility a proper masterplan.

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.

33. Policy DES 2 should state that:

“Planning permission will normally be granted for major development over 3 hectares where it accords with the following master planning principles”

Section - 7.3 Residential Development

Policies – RD 1

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.

34. Policy RD 1 should be amended to state that *“planning permission will normally be granted for development...”*. Including the word normally allows for flexibility in the policy. This is needed because there will be examples where a proposal will be in an area where the Council wants to increase height and density of development (along city corridors or in the city centre), which may be considered to conflict with the character of an area. The potential of this type of development, which is in compliance with other policies in the plan, should be allowed for in policy RD1.
35. Policy RD 1 criterion G is confusing as it implies that residential development located at the rear of a property will not be allowed. The policy actually means that where rear property is promoted it should have direct and safe access from the public road.
36. The policy needs to be clarified to ensure that planning officers are not overly restrictive in assessing application and there is no misinterpretation of the policy.

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.

37. Policy RD 1 should be amended to include the word “normally” and criterion G should be changed to state:
“Any units which are wholly in the rear of the property should have direct, safe and secure access from the public street”.

Section - 7.4 Built Heritage

Policies – BH 3

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.

38. Policy NH 3 seeks to maintain ATCs, however there is a need to recognise the potential that some ATCs may also be a City Corridor area, where there is a need to increase density and height of the buildings in the area. While we recognize the need for ATCs to be properly assessed, designated and protected and enhanced, exceptions to the policy, are required. Inclusion of the word “normally” would allow for exceptions.
39. Policy BH 3 also requires development to have regard to relevant supplementary planning guidance. However, it is unclear what this supplementary guidance is. The PAC recommendation on BMAP was that guidance be produced for each ATC, but our review of the papers in the LDP Strategy website has not identified any supplementary guidance for ATCs. Our clients are concerned that publication of supplementary guidance, without full public consultation and Examination in Public will increase the restriction of development in ATCs without full and fair debate and will be a way of circumventing the development plan process.
40. We also note that the last paragraph of policy BH 3 seeks to have planning intervene in the commercial interests of a site, where the Council are seeking to prohibit demolition of buildings in an ATC until contracts have been signed for the approved development of the site. This intervention will be unenforceable, as contracts are commercially sensitive, and developers may use different contractors for demolition and construction. Planning approvals and S76 agreements can be used to control a planning permission’s implementation, and the additional layer of planning becoming involved in the commercial negotiations and agreements between developer and contractor is inappropriate.

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.

41. Policy BH3 should be amended to state that “*Planning permission will normally only be granted ...*”
42. Policy BH 3 should delete the final paragraph that states “*Where demolition consent is granted this will be conditional on prior agreement for the development of the site,*

[REDACTED]

including prohibition of demolition until contracts have been signed for the approved redevelopment of the site”.

43. Any supplementary guidance for the ATCs should be published as soon as possible and this should be open for consultation and Examination in Public before being applied to assess applications within ATCs.

Section – 8.1 Inclusive economic growth

Policies – EC 6

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.

44. Policy EC 6 severely curtails potential B1 (a) office use on city corridors and arterial routes. Office development on arterial routes is an important economic use and allows small businesses to locate in areas where they might not be able to afford to locate in designated centres. It also is sustainable as small offices on such routes can allow people to walk to work, remove traffic and parking in the City Centre and workers in these areas can sustain small service businesses in the area. Such use will encourage people to live in high density development close to arterial routes. Vibrant and well populated city corridors or arterial routes are indicative of a strong city generally.

45. Policy EC 6 should provide for an allowance for office accommodation in city corridors.

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.

46. Policy EC6 should include the following:

“Along the frontage of City Corridors, small office accommodation of up to 200 sq m will be allowable either by upper floor change of use or by sensitive infill development of brownfield sites”.

Section – 8.1 Retail

Policies – RET 3

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.

47. Policy RET 3 curtails the use of city corridors for the use of convenience retailing and prohibits all comparison retailing along city corridors. Roads such as Lisburn Road has developed a strong reputation for the provision of boutique fashionwear shopping. This offer complements the offer of the City Centre, and does not undermine it. The prohibition of comparison shopping along City Corridors has potential to reduce the vitality and economic viability of these neighbourhoods. In order to maintain the balance between supporting the neighbourhoods and preventing competition with the City Centre, we would request that an allowance of 200 sq m of retail floorspace is provide for comparison shops. It would also be appropriate to re-introduce the 500 sq m net convenience floorspace limited to city corridors also.

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.

48. Policy RET 3 should be amended as flows:

“Local shops that are not designated as part of a local centre such as those along city corridors will be limited to performing a local convenience and service role and must be no greater than 500 sq m. Along the frontage of City Corridors, comparison shops of not greater than 200 sq m will be permitted”