



Local Development Plan Team
Lisburn and Castlereagh City Council
Civic Headquarters
Lagan Valley Island
Lisburn
BT27 4RL

9th January 2020

By Post & Email

Dear

Re: Representation to the Lisburn and Castlereagh City Council Draft Plan Strategy - Policy SMU03 - Sprucefield Regional Shopping Centre

I write further to the release of the Council's Draft Plan Strategy and specifically the approach of LCCC in respect of Sprucefield Regional Shopping Centre.

The RDS 2035 recognises that Sprucefield will continue to retain its status as a Regional out-of-town shopping centre, as indicated at paragraph 3.41.

The RDS is the overarching framework that provides the strategic context for where development should take place. It states at paragraph 1.9 that it is material to decisions on individual planning applications and appeal, but it does not contain operational planning policy (Paragraph 1.5) and guidance which is issued through Planning Policy Statements (PPSs). In other words, the Strategic Planning Policy Statement for Northern Ireland (SPPS).

A Regional Shopping Centre is not defined in the RDS or SPPS and there is no reference to Sprucefield in the SPPS. It is also excluded from the proposed Retail Hierarchy in the draft Plan Strategy.

Retail NI disagrees that it is the responsibility of the Plan to define what Sprucefield's role is given it is a Regional out-of-town shopping centre and it should fall to the Department, given its regionally significant role.

References to Regional Shopping Centres in the UK and England have no relevance or basis to Northern Ireland. The critical mass and population in England and the UK are significant and people travel much greater distances, better transport links, so the associated catchments would not be reflective of Northern Ireland.

The SPPS was formulated following the Town Centres and Retailing Research Project undertaken by GL Hearn for the DOE in January 2014.

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Other main town centre uses are defined in the footnote of Page 101 of the SPPS and include cultural and community facilities, retail, leisure, entertainment and businesses. This is not an exhaustive list, but is representative of the types of uses that would drive footfall and sustain and enhance the vitality and viability of town and city centres.

Paragraph 6.268 of the SPPS makes it clear that of the need to enhance the distinctive role of Belfast City Centre as the primary retail location in Northern Ireland, and in relation to future major retail development proposals it promotes a precautionary approach based on the likely risk of out of centre shopping development having an adverse impact on the city centre area.

The suggested expansion of Sprucefield is completely unsound, inconsistent and irrational, taking account that there are undeveloped lands to the south west and south east of the existing Sainsburys Petrol Filling Station. These were subject of a recent retail led mixed-use application LA05/2018/1061/O, which was recently withdrawn by Lichfields on 11/12/2019.

The Retail Capacity Study identified that any future retail development will greatly depend on maintaining and improving the infrastructure in the City Centre while supporting the retail offer with leisure and other commercial uses.

I also note the previous approach to Sprucefield in the BMA Retail Strategy (bulky goods) and in subsequent planning applications.

The draft Lisburn City Centre Masterplan Review 2019 and draft West Lisburn Development Framework Review 2018, both acknowledges the complementary role of Sprucefield and its relationship with Lisburn City Centre to deliver a range of choice for consumers.

The approach adopted in the draft Plan Strategy relating to Sprucefield would be inconsistent and unsound with the direction of the SPPS, its complementary role and the promotion of Lisburn City Centre.

I would welcome confirmation of this letter and if you wish to discuss this matter, then please do not hesitate to contact me.

Yours sincerely

Chief Executive of Retail NI