

**LISBURN AND CASTLEREAGH CITY COUNCIL
LOCAL DEVELOPMENT PLAN 2032**

Draft Plan Strategy Response

Unicorn Group

Lands at The Green, Tullynacross Road, Lisburn.

January 2020

A Representation to the Lisburn and Castlereagh City Council Draft Plan Strategy (2032)

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1.0 Introduction

- 1.1 This representation has been prepared by **TSA Planning** on behalf of our client **Unicorn Group**, in respect of Lisburn and Castlereagh City Council's published Draft Plan Strategy (DPS) for their Local Development Plan 2032.
- 1.2 Unicorn Group are a manufacturing group based in Lisburn, and own a number of manufacturing companies across multiple industries, distributing products to a range of customers worldwide. The Group is currently going through a continued period of rapid growth; through business acquisitions and increased sales.
- 1.3 Due to the latter, our client acquired the former Coca Cola bottling factory at Tullynacross Road, Lisburn in late 2017, with the intention to bring the factory back into successful operation (see Site Location Plan at **Annex 1**). The vision for the factory includes plans to re-develop the site into a multi-purpose business, warehousing, and manufacturing campus style business park, and open the site up for rental opportunities to a variety of other businesses.
- 1.4 In light of the above, our client has a keen interest in the DPS; its Economic Vision, Objectives, Strategic Policies and Spatial Strategy. Therefore, the purpose of this representation is to set out how the former Coca Cola bottling factory at Tullynacross Road can help contribute to achieving the economic needs of Lisburn and Castlereagh over the plan period.
- 1.5 To inform this response to the Draft Plan Strategy, consideration is given to the legislative requirements relating to the preparation, form and content of the Local Development Plan set out in the Planning Act (NI) 2011 and The Planning (Local Development Plan) Regulations (NI) 2015. Consideration is also given to the following Policy and Guidance publications, along with the wider content of the Draft Plan Strategy (including accompanying assessments and technical supplements):
- The Regional Development Strategy (RDS) 2035;
 - The Strategic Planning Policy Statement (SPPS);
 - The Department's Development Plan Practice Notes (DPPN); and in particular:
 - DPPN 6 - Soundness; and
 - DPPN 7 - The Plan Strategy.
 - Draft Plan Position Paper 3: Employment and Economic Development; and
 - Draft Plan Technical Supplement 3: Employment Land Review (October 2019).
- 1.6 Regard is also had for the Preferred Options Paper stage, the LDP Timetable, and the Council's Community Plan 2017/2032.

- 1.7 The report has been structured as follows: -
- 1.8 **Section 2** sets out our consideration of the Strategic Allocation of Employment Land in Chapter 4 of the DPS, its supporting evidence base, and our reasoning as to why we consider the allocation to be **unsound** in its current form. This section also sets out the steps we believe are necessary to make this element of the DPS sound.
- 1.9 **Section 3** sets out our analysis of Employment Lands at The Green, Tullynacross Road, Lisburn and how the site can help make the plan **sound** at Independent Examination Stage.
- 1.10 **Section 4** sets out our conclusions.
- 1.11 We respectfully request this representation is heard by **oral hearing** at Public Examination Stage.

2.0 Strategic Employment Allocation and Supporting Evidence Base.

- 2.1 We consider the Plan Vision and Objectives to be consistent with the RDS (2035) and SPPS (2015) in that the overriding aims of the LDP is to make provision for an ample and adequate supply of employment land in suitable locations to support economic growth and job creation within the Borough.
- 2.2 However, we are concerned that the Strategic Policy SP11 and the associated Strategic Employment Allocation is **unsound** when considered against Soundness Tests **CE1** and **CE2** in that the Policy does not set out a coherent strategy, and it is provided on an incomplete evidence base that does not consider reasonable alternatives; namely the reuse of suitable, unzoned brownfield sites.
- 2.3 The Strategic Employment Land Allocation for Lisburn and Castlereagh over the plan period has been set out under the Strategic Policies and Spatial Strategy in Chapter 4 of the LDP. An extract of the Strategic Employment Allocation can be found below at **TSA 1** and the Land Allocation (Table 5) is at **Annex 2**.

Strategic Employment Allocation

The supply of employment land is identified through a hierarchy of sites which consist of:

- **Strategic Mixed Use sites (SMU) - Land designated at:**
 1. West Lisburn/Blaris
 2. Purdysburn/Knockbracken
- **Local Employment Sites**

The Employment Land Review focused on sites zoned in the existing development plan as the basis for assessment. These existing zonings are carried forward under the transitional arrangements outlined in Chapter 1.

TSA 1 – Strategic Employment Allocation Lisburn and Castlereagh

- 2.4 The Strategic Employment Allocation shown above at **TSA 1** has been based on the supporting Employment Land Review (ELR) by Litchfield's Planning Consultancy undertaken between June and August 2019. The review undertook a full Employment Land Evaluation Assessment (ELEF) in line with the RDS 2035. Following this, the approach taken was to carry forward 30No. sites key sites previously zoned in the existing development plan (BMAP 2015) and used these sites as the basis for the allocation.
- 2.5 By way of a brief summary, the ELR identified that there are 5 key areas within Lisburn and Castlereagh for the distribution of Employment Land over the plan period. Within these areas, there is 220 hectares of existing zoned developable land for economic uses. Litchfield's have then used past completion rates as a baseline for generating a forecast need for 44.85ha of developable employment land over the plan period.

- 2.6 To accommodate this need, the supporting text of the Strategic Employment Allocation (SEA) states that the existing 220ha of employment land is **more than sufficient** for employment purposes over the 15-year plan period.
- 2.7 However, whilst our client does not have any objections per se to any of the identified zonings, we don't believe the approach taken is coherent with the Economic Objectives and Strategic Policy 4 of the DPS.
- 2.8 In light of the above, we believe the employment strategy and proposed employment land allocation is **unsound** in its current form against the following soundness tests:
- Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow; and
 - Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

Detailed Assessment

- 2.9 The ELR and Position Paper 3 identified the following key findings: -
- There are 365No. premises within Lisburn and Castlereagh that could be classified as general "B Class" employment uses, yet only 30 previously zoned (existing and proposed) employment sites from BMAP 2015 have been subject to a Stage 3 ELEF assessment and have been carried forward to accommodate the employment land requirement over the plan period (i.e. SMUS and LES). The plan does not quantify what the existing unzoned, employment lands contribute to the employment strategy of the Borough.
 - Instead the Strategic Employment Allocation (SEA) is wholly predicated on existing and proposed BMAP zoned lands remaining to be developed in Lisburn and Castlereagh for Employment purposes (the vast majority of which are greenfield, totalling 252.2ha (91.6%)).
 - Similarly, the SEA does not take account of the Maize Lands. Whilst there is explanatory text set out at in the supporting text of the SEA (page 77), there is no corresponding strategic or operational policy for the Maze Site.
 - Position Paper 3 also set out the conclusions of a consultation with key stake holders which identified the following: -
 1. Existing employment land is not necessarily in the right locations;
 2. More economically viable employment land locations are needed regardless of former zonings;
 3. There is a need to increase focus on high technology, renewable engineering and energy uses;

4. There is a need for large floorplate offices and land for offices to be ready within a short turnaround time; and
5. The distribution and quality of the land supply is to be retained across the Council area. Differing locations will appeal to a range of different businesses and sectors. Connectivity, infrastructure and provision of a high-quality design environment is to be encouraged.

2.10 In light of our above key findings, we consider the Council's intention to limit the supply of Employment Land over the plan period to thirty existing zoned Strategic Mixed-Use Sites (SMU) and Local Employment Sites (LES) does not take account of reasonable alternatives, and is inconsistent with the findings of their evidence base. This is not coherent with the objectives and other strategic policies set out within the DPS for the following reasons: -

- The Council is intending to carry forward 220ha of existing and proposed zoned employment land to accommodate the 44.85ha required over the plan period. This is primarily Greenfield which is unsustainable;
- As the majority of zoned employment lands (i.e. SMUs and LESs) are greenfield this contradicts the sustainability objectives of the RDS and SPPS which recognises the benefits of re using previously developed land; and
- No assessment has been given to the sustainability/viability of zoning existing unzoned Brownfield sites across Lisburn and Castlereagh for employment uses to accommodate the required need. There is potentially several underutilised but suitable unzoned sites across the Borough that would meet the sustainable employment objectives of the LDP (such as our client's lands at Tullynacross Road as set out in **Section 3**).

TSA Proposed Amendments

2.11 Having taken the above into account, we consider the Employment Land Allocation is **unsound** in its current form.

2.12 To ensure the Employment Land Allocation is found **sound** at Independent Examination Stage, we would suggest the following amendments are made: -

- Review and refine all employment sites (whether zoned or unzoned) to be carried forward and include existing, suitable, unzoned Brownfield sites ahead of new greenfield zoned sites within Lisburn and Castlereagh.

2.13 Taking the above into account, and as an example, we would present for consideration our clients lands at The Green, Tullynacross Road for assessment at Local Plan Policies Stage to meet the DPS Employment Land Requirement.

3.0 The Green, Tullynacross Road, Lisburn

- 3.1 Whilst we appreciate the actual identification of land use zonings is a matter for Local Plan Policies Stage; we feel it is expedient to make the Council aware at this stage that our client is committed to bringing forward a range of employment uses at this extensive site, which would clearly contribute to the Strategic Employment Allocation at this stage of the plan process.
- 3.2 By way of a brief history, the factory was one of two plants used by the Coca-Cola Hellenic Bottling Company to produce the drink in Ireland, until all production was moved in 2008 to a larger facility on a 45-acre site at Knockmore Hill, Lisburn. Unicorn Group acquired the site in late 2017 and currently occupy part of the premises, along with Flexi-Tile, KME Steelworks. The industrial holding is however underutilised at present.
- 3.3 Due regard should be had that the floorspace within the existing manufacturing premises is available, and this would assist in delivering c.7.11ha (17.57 acres) of the 44.85ha (110.8 acres) of employment floorspace required within Lisburn and Castlereagh over the plan period for multipurpose business uses, warehousing and manufacturing. Uses which were identified during the stakeholder engagement process, as part of the ELR, and those identified as being a priority in the LDP (e.g. high technology, renewable engineering uses, growth, distribution and office workspace) would easily be accommodated at the subject site.
- 3.4 The following sections will identify the merits of taking account of the site within the SEA at Table 5; and subsequently within the defined settlement development limit for Lisburn City, and zoning the site for employment uses at Local Plan Policies stage.

Site Context

- 3.5 The site sits north east of Tullynacross Road; immediately adjacent to the Settlement Limits of Tullynacross and Lisburn City, within the Lagan Valley Regional Park and a Local Landscape Policy Area, and south of the River Lagan. It is contained by a metal security fence; augmented by an abundance of mature planting, with existing residential dwellings along "The Green" towards the site frontage, adjacent to the sites access as shown overleaf at **TSA 2**.



TSA 2 – Site Location in Context

- 3.6 The site benefits from a highly accessible location within the Belfast Metropolitan Urban Area (BMUA), c.1.3 miles to the north of Lisburn City Centre; with excellent connection to the A1 protected road line between Belfast City and Lisburn City (c.0.3 miles) to the west. There are onward connections to the M1 Motorway (Junction 6 c.2.2 miles to the south and Junction 3 c.3.2 miles to the north). Lambeg Train Station is also located c.0.5 miles from the site to the north west, and Hilden Train Station is located c.0.7 miles to the south west.
- 3.7 The site is also immediately adjacent to the Lagan Tow Path, which offers excellent pedestrian and cycling connectivity to the employment lands.
- 3.8 Accordingly, the site is strategically placed in a highly accessible location.

Consideration

- 3.9 In light of the Councils emerging Economic Development Strategy and Objectives within the DPS, and local and regional policy direction, significant weight should be given to the overarching principles of sustainable development by bringing brownfield sites such as this former successful industrial/employment factory and site back into use, and recognising its potential to deliver the needs of stakeholders throughout Lisburn and Castlereagh.
- 3.10 Accordingly we would recommend adjusting Table 5 to take account of **existing unzoned brownfield sites** (such as this site). Whilst this correspondence focuses on our client's lands, it demonstrates that there is a viable alternative, that would assist in the delivery of employment floorspace over the plan period. In addition, such an approach could also ensure such lands contain an active use rather than fall into dereliction. Furthermore, to ensure site potential is maximised, we would recommend both the site and the existing Settlement Development Limit of Tullynacross be brought within the Settlement Development Limit of Lisburn City, and identifying the former Coca Cola factory as a **Local Employment Site**

suitable for a variety of employment uses. An extract of this can be seen below at **TSA 3** and at **Annex 3**.



TSA 3 – Proposed extension to the settlement limit of Lisburn

- 3.11 In addition, the re-use of available floorspace/employment lands is the most efficient and sustainable use of land, and coincides with the results of the stakeholder engagement process supporting the employment land allocation which returned a need for large floorplates for Business Use to be ready within a short turnaround time.

4.0 Conclusions

4.1 In conclusion, this representation has assessed the published Draft Plan Strategy (DPS) 2032 in respect of its Plan Vision, Economic Objectives, Strategic Policies, Spatial Strategy and Employment Land Allocation; taking into account the tests of soundness set out in Development Plan Practice Note 6 – Soundness. The Employment Land Allocation presented in Chapter 4 of the DPS is **unsound** when assessed against the following tests: -

- Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow; and
- Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

4.2 In order to make the Plan Sound, the SEA in Table 5 of SP11 should be adjusted to take account of reasonable alternatives. In this case, rather than just considering existing and proposed employment zonings carried forward from BMAP (2015), due regard should be had to **existing unzoned brownfield sites** which may be underutilised, but suitable for employment uses.

4.3 In the interests of the overarching principles of sustainable development, consideration should first be given to existing unzoned Brownfield sites before permitting the zoning of Greenfield lands.

4.4 Therefore, we would respectfully request the Council retain **Section 3** of this representation to inform the Local Plan Policies Stage; whereby the identified site would form a natural extension to the settlement limit of Lisburn City; assist in delivering the employment land allocation identified in **Section 2**; and broaden the range and choice of employment land required within Lisburn and Castlereagh over the plan period.

4.5 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Draft Plan Strategy.



**ANNEX 2 –
TABLE 5 – STRATEGIC
EMPLOYMENT ALLOCATION**

Table 5 Strategic Employment Allocation over Plan Period

Site Ref.	Site Name	Location	Total Area Zoned (Ha)	Area Developed (Ha)	Total Area Remaining (Ha)	Total Area Developable (Ha)	Status
STRATEGIC MIXED USE SITES							
LD05**	Baird Road	Lisburn City	119.48	0	60.00	52.49	Not Started
MCH 13	Knockreehan Healthcare Park, Sainfield Road	Castlereagh Greater Urban Area	85.54	41.51	69.72	44.03	Not Started
LOCAL EMPLOYMENT SITES							
LD06**	Barbour Threats Mill	Lisburn City	5.53	5.53	2.87	2.83	Not Started
DA05**	Land South of Woonah Development, Rathfriland Road	Dromara	3.54	0	3.54	3.28	Not Started
LD06	Knockmore/ Lissue Road	Lisburn City	3.09	0	3.09	3.09	Not Started
LD07	Lissue Road	Lisburn City	14.34	0	14.34	10.86	Not Started
LD09	Ballyderry/ Knockmore Road	Lisburn City	44.3	23.63	20.67	17.74	Ongoing
LD10	Baird Industrial Estate	Lisburn City	25.23	24.46	2.28	0.77	Ongoing (almost complete)
LD11	Enterprise Crescent, Ballyderry Road	Lisburn City	13.19	13.19	0.73	0	Complete
LD12	Ballyderry Road	Lisburn City	7.43	7.43	0.18	0	Complete
LD13	Flush Park Industrial Estate, Knockmore Road/ Meira Road	Lisburn City	8.47	4.91	3.55	3.55	Ongoing
LD14	Lissue Industrial Estate	Lisburn City	52.82	49.09	8.1	3.73	Ongoing
LD15	Coca-Cola Plant, Lissue Road	Lisburn City	18.47	17.3	3.55	1.17	Ongoing
ML05	Seymour Hill Industrial Estate	Lisburn Greater Urban Area	10.8	6.07	4.73	4.73	Ongoing
ML06	Derrigry Industrial Estate	Lisburn Greater Urban Area	44.54	39.27	5.27	5.27	Ongoing

Cont...

Site Ref.	Site Name	Location	Total Area Zoned (Ha)	Area Developed (Ha)	Total Area Remaining (Ha)	Total Area Developable (Ha)	Status
MCH05	Lanes SE of Millmount/ Comber Road	Dundonald	9.27	0.68	8.59	8.56	Not Started-road only
MCH06	Upper Newtownards Road/ Carroneagh	Dundonald	34.93	11.56	23.26	23.06	Ongoing
MCH07	Newtownside Factory Estate Cedarhurst Road	Castlereagh Greater Urban Area	2	2	0	0	Complete
MCH08	Cedarhill Industrial Estate, Bechtal Road	Castlereagh Greater Urban Area	2.02	1.64	0.38	0.38	Ongoing (almost complete)
MCH12	Former Green, Sainfield Road	Castlereagh Greater Urban Area	2.54	0	2.54	0.2	Not Started
CF05	Ballynahinch Road	Carryduff	11.74	0.44	11.29	9.04	Ongoing
CF06	Lands at Comber Road	Carryduff	5.55	0.27	5.28	5.28	Ongoing
CF07	Cyril Johnson & Co, Ballynahinch Road	Carryduff	5.1	5.1	0	0	Complete
CF08	Carryduff Business Park, Comber Road	Carryduff	5.13	4.97	0.16	0.09	Ongoing (almost complete)
CF09	Sainfield Road	Carryduff	3.8	3.33	0.47	0.47	Ongoing (almost complete)
CF10	Eastbank Road	Carryduff	1.96	0.79	1.17	1.10	Ongoing
CF11	Eggar Industrial Estate	Carryduff	6.73	6.05	0.68	0.76	Ongoing
GT05	Land North West of Gubernall Road	Glenavy	6.27	0	6.27	6.27	Not Started
RURAL EMPLOYMENT SITES							
LN07	Lands at Glenavy Road, Moore	Lisburn Countryside	24.06	12.26	11.8	11.8	Ongoing
CR01	Maryland Industrial Estate, Crossnacreevy	Castlereagh Country	5.58	5.47	0.11	0.11	Ongoing (almost complete)
TOTALS			583.45	286.95	237.02	226.68	

* Strategic Mixed Use Site at West Lisburn/Baird with 50% of site for residential development
 ** denotes mixed use



Project:
The Green, Tullynacross Road - LCCC DPS Response

Client:
Unicorn Group

Drawing Title:
Table 5 - Strategic Employment Allocation

Drawing No:
TSA 2843-003

Date:
January 2020

Revision:

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**ANNEX 3 -
AREA PLAN EXTRACT
EXISTING AND PROPOSED**



Existing Development Limit



Proposed Development Limit