

## **Dungannon & South Tyrone Borough Council**

### **Response to PPS5 Retailing, Town Centres and Commercial Leisure Developments**

#### **Introduction**

The Department for Regional Development has launched a consultation on a proposed new Planning Policy Statement which sets out the main planning policies for retail development in towns, other centres, settlement and rural areas throughout NI. As you will note PPS's are taken into account when preparing and delivering upon development plans and are material consideration for the determination of planning applications and appeals.

Specific detail on PPS5 is available from the Corporate Strategy and Policy Officer or Town Centre Regeneration Manager.

#### **Dungannon & South Tyrone Borough Council comments**

As a lead partner within the DRP, the Council would adopt its response to the PPS5 which will impact on the future of town centre development. See attached DRP's draft comments.

In addition, the Council would seek to make the following comments:

The Council would support the need to develop town centre strategies. It is important that such town centre strategies are integrated into a wider plan for a sub regional area to ensure the main urban centres are linked to smaller village, settlement and rural area development.

It is also critical that town centre strategies do not solely concentrate on retail and leisure development but take account of all the social, economic and environmental needs of an area. Consumers are demanding an increasing role from town and other centre development, it is no longer viewed as just a shopping location, but a wider experience in terms of business, leisure, evening entertainment and tourism participation.

Future plans also need to take account of changing user needs which are more diverse and multi focused. In terms of being proactive in driving the future of our town centres rather than reactive it is important that a policy such as PPS5 looks favourably towards developments that will bring major regeneration to an area that is focused on mixed use.

Whilst it has been proven that a hierarchy of retail development is required for a region the size of Northern Ireland, there does need to be flexibility for market forces in terms of retail demand and supply. In the past, out of Belfast City & Derry City, development has been curbed for other urban regions, which would for NI have had a positive impact.

It is important that PPS5 is used alongside other PPS's that deal with such areas as transport, parking, environmental improvement, cultural and heritage development etc. PPS5 and PPS3 'parking' need to work together, for example to support the regeneration of derelict land in town centres it would be important that limited parking licenses are granted to owners of blighted land, as this would restrict income generation resulting in land being unviable and more favourable for development. Similarly it is critical that there is sufficient car park provision to support planned retail development, as this is a key requirement for retail investors.

It is important that PPS5 supports the new tourism policy to be developed as retail has become a key product as part of the tourism package.

Dungannon town as with many other urban town centres is experiencing some level of town centre vacancy and areas of blight. It is important that PPS5 recognises that this needs to be addressed and links the relevant departments to support this to happen.

It is important that PPS5 recognises both the daytime and evening time economy. Town centres are no longer just viewed as retail centres. Dungannon & South Tyrone Borough Council is seeking to develop one of Dungannon towns main assets; Heritage and Culture which is located in the town centre and complementary to this is the development of the Borough as a Good Food – Eating Out location 'Flavour of Tyrone'. These are key assets for the development of the Borough and for tourism which need to complement the retail and leisure product.

Council accepts the need to curb out of town retail, unless demand for a unique product can be made. It is important in situations such as this that close liaison does take place with Council particularly if a large master plan for the area exists.



## RESPONSE TO:

### PPS5 FOR RETAILING, TOWN CENTRES, AND COMMERCIAL LEISURE DEVELOPMENTS

Dungannon Regeneration Partnership (DRP) welcomes the publication of the Draft PPS5 in that existing town centres will be the focus for future shopping and commercial leisure development and investment. The previous policy was too vague and led to an increase out of town shopping locations and consequently a decline in many regional town centres as purchasing power moved out of town. This situation must be reversed and out of town shopping developments curbed to allow town centres to develop and grow. It is widely recognised that a vibrant town or city is vital to the development of the wider local area.

The Partnership acknowledges the importance of the retail sector in the economic success of any urban area and it is crucial that the new policy removes uncertainty for both existing retailers and developers alike. This will help foster a new culture of sustainable investment in town centres, which complements the existing retail offering.

DRP would remain of the view that the scale of permissions granted to edge of and out of town shopping developments over recent years highlights the importance of the Department undertaking a retail capacity assessment for Northern Ireland to provide a base upon which to assess further applications for 'major' retail developments and the ability of the economy to support the increase in retail floorspace.

DRP would concur that the preparation of a development plan must include an assessment of existing and future retail and commercial leisure provision within the plan area and also examine the existing and future roles of town centres within the wider context. Also in terms of the development plan, DRP would agree that the process should include an assessment of existing retail patterns and floorspace provision, town centre healthchecks and examination of future retail need.

In terms of monitoring and evaluation there is insufficient detail in the draft policy document on the level, type and timing of monitoring to be carried out by the Department. The Partnership would reiterate the importance of conducting a spatial Retail Baseline Study that would identify indicators to monitor the policy and assist in comparing the performance of urban centres in Northern Ireland.

DRP fully supports the formulation of a coherent and meaningful Town Centre Strategy that has been developed with involvement of the private, public and community sectors. Town Centre strategies should reflect the Area Plan and identify sites which are 'realistic opportunities' for investment and also provide guidance on how government proposals can be harnessed i.e. grants, vesting, comprehensive development. The Partnership would recommend that Government should prepare and issue clear guidance on the preparation of Town Centre Strategies. However, there needs to be a recognition that the issues facing town centres such as Dungannon also require a holistic approach based on an integrated town centre strategy with business development, training, marketing and promotion, tourism, property development and public realm elements. DRP would remain of the view that the strategies are led by District Councils in 'joined up' partnership with Town Centre Regeneration/Management Companies, which are representative of the statutory, private and community sectors.

As previously stated DRP agrees with establishing town centre locations as the first port of call for development. DRP welcomes the Sequential Approach to be applied to site selection and would underline the importance of providing clear, precise criteria to the developer and placing the onus of responsibility on applicants for planning permission to prove that an out-of-centre location is both unavoidable and has a limited and definable impact on existing town centres. The Partnership would concur that even where a developer, as part of the Sequential Approach, demonstrates an out-of-centre location to be the most appropriate, the impact on the vitality and viability of existing centres still has to be clearly shown to be acceptable and complimentary to the existing offering in the urban centre. It is also important that close liaison takes place with Councils and Town Centre Regeneration Partnerships if such an issue arises. The department should also consider how prescriptive the sequential process will be to ensure an efficient and effective planning application process that is not hindered by delays. Resources should be allocated as necessary to ensure backlogs in the planning process are kept to a minimum.

DRP believes that a strategic retail hierarchy of urban centres should be identified within the policy, which would identify the role, function and capacity of town centres in Northern Ireland for further investment. Northern Ireland has a limited market size and such a hierarchy would encourage and direct retail investment in centres where there is a retail capacity and identified need for investment, such as Dungannon. Dungannon town has the capacity to develop and grow business, especially retail business and this must be taken into account to ensure a sustainable balanced approach to investment in Northern Ireland. The Partnership believes that directing all 'major' regional developments to Belfast and Londonderry runs counter to the free market and at a time when the number of parking spaces in Belfast is to be reduced. Furthermore, there is already massive private and public investment in Belfast and Londonderry.

DRP strongly recommends that where interest is shown in a town centre property that has been 'landbanked', that government works with Councils and Town Centre Regeneration Partnerships to use vesting and/or comprehensive development powers to unlock such sites for development.

Tourism is now a major opportunity with 47% of visitors to Northern Ireland citing shopping as a reason to visit. This figure underlines how shopping is an integral aspect of everyday lives and the importance of PPS5 supporting the new tourism policy to be developed.

It is essential that PPS5 is used alongside other policy statements that deal with issues such as transport and parking, i.e. PPS3 'Parking' to ensure adequate parking provision is created as part of a planned retail development.

The Partnership would highlight the importance of promoting quality through the assessment process to ensure high quality urban design and attractive town centres to shop, visit and live in. It is crucial for their sustainability that town centres retain their individuality and character, and therefore any plans must take cognisance of Conservation Areas and Areas of Townscape Character identified in Area Plans.

DRP would also question the designation of Sprucefield as a Regional Shopping Centre in Northern Ireland. RRP2 states that any applications will be judged on their own merits and their contribution to Sprucefield's Regional Role – this is essentially stating that Sprucefield has a 'carte blanche' to have any retail mix.