Local Development Plan 2030

Technical Supplement 6
Retailing and Town Centres

September 2019

Mid & East Antrim Borough Council

www.midandeastantrim.gov.uk/planning

Contents

1.0 Introduction

Purpose of this document

1.1 This technical supplement brings together the evidence base that has been used to inform the preparation of the Mid and East Antrim Local Development Plan (LDP) 2030 draft Plan Strategy. It is one of a suite of topic based technical supplements that should be read alongside the draft Plan Strategy to understand the rationale and justification for the policies proposed within it.

1.2 This technical supplement builds upon and updates LDP Position Paper 4 which provides baseline information for Town Centres an Opportunity Sites and formed part of the evidence base for the Preferred Options Paper (POP). It provides an overview of the regional and local policy context and the town centre profiles for the three main towns in Mid and East Antrim. In addition, a Retail and Commercial Leisure Study was undertaken on behalf of Council by retail consultants Nexus Planning, to analyse market trends and to conduct a retail and commercial leisure need and capacity study, to assess quantitative and qualitative need for additional retail and commercial leisure floorspace. This report, (hereafter referenced to as the Retail Study) is included in Appendices C and D to this Technical Supplement. This study is supplemented by town centre health checks, carried out by Council Planning staff in the three main town centres. The combination of these two documents demonstrate how the various strands of the evidence base have been considered in the formulation of the Retail Hierarchy SGS 7 and policies RET1-RET4 in the draft Plan Strategy, including responses to the POP and ongoing consultee and councillor engagement.

Planning and Retailing and Town Centres

1.3 While our town centres are a focus for retailing and related facilities, they are also important hubs for a wide range of other land uses and activities that are important to those who live in, work in and visit them including residential, employment, leisure and cultural uses.

1.4 The retail sector in Mid and East Antrim, as elsewhere, has been faced with a range of challenges. These include changing consumer and lifestyle trends that require the retail sector to adapt, the rise in electronic commerce and internet shopping, competition from out of town shopping centres/retail parks, and the change in fortunes of the general economy which can have a dampening effect on retail spending.

1.5 Given the importance of our town centres in Mid and East Antrim, as the main hubs of economic and social activity, it is vital that they remain economically competitive and vibrant. This will require then to be able to offer an experience over and above an average functional shopping trip, which might otherwise be carried out online or at out of town retail parks.

1.6 The Planning System can promote diversification of uses within our town centres, making them more attractive, viable and sustainable, through the promotion of established town centres as the appropriate first choice location for retailing and other complimentary town centre functions.

2.0 Policy Context

Regional Policy Context

Regional Development Strategy 2035 (RDS)

2.1 The RDS is a spatial strategy and provides an overarching strategic planning framework to facilitate and guide sustainable development. In relation to town centres and retailing, it provides regional guidance and Spatial Framework Guidance

2.2 Regional Guideline 1 (RG1) seeks to ensure adequate supply of land to facilitate sustainable economic growth. Whilst the focus is on industrial and business uses, it does refer to the importance of strengthening the larger urban centres and regional gateways, to take advantage of their locations on the regional transport network. Regional Guideline 7 (RG7) in supporting urban and rural renaissance, places importance on 'Developing innovative ways to bring forward under-utilised land and buildings, particularly for mixed use development'. The RDS recognises the importance of accessible, vibrant town centres which offer people more local choice for shopping, social activity and recreation.

2.3 The Spatial Framework Guidance is tailored to each of the 5 elements of the spatial framework. It also takes account of the hierarchy of settlements and the patterns of service provision (transport, education, commercial etc.) which the RDS deems to be appropriate at different spatial levels, i.e. villages, urban centres / smaller towns, regional towns /clusters and cities. The overall purpose of the SFG is to promote balanced and integrated growth across Northern Ireland, including the revitalisation of established towns and villages. Within this context, the implications and main thrust of the SFG for the role and future development of towns and town centres in Mid & East Antrim District are discerned as follows:

2.4 Ballymena is identified in the RDS as a 'main hub' and recognised as having a well-established sub-regional role, particularly as a significant retail centre. Larne is identified in the RDS as a 'main hub' and a 'gateway' due to its strategic coastal location and its status as the second largest port in Northern Ireland. The location of the town on the Causeway Coastal Route has the potential to grow tourism and increase the vitality and prosperity of the town centre. Carrickfergus is a key coastal location within the Belfast Metropolitan Urban Area. With a vibrant marina, waterfront development and historic castle it has significant tourism potential, assisted by good transport links with Belfast and Scotland via Larne and also its location on the Causeway Coastal Route. Carrickfergus has a complementary role to play within the BMUA and therefore it is important for the town to widen its economic base. The potential for tourism growth provides some opportunity to strengthen the town centre economy.

Strategic Planning Policy Statement (SPPS)

2.5 The SPPS was published by the former Department for Environment (DOE) in September 2015. The SPPS sets out the core principles, underpinning the new two tier planning system, one of which is 'supporting sustainable economic growth' The aim of the SPPS is to support and sustain vibrant town centres across Northern Ireland, through the promotion of established town centres as the appropriate first choice location for retailing and other complementary functions, consistent with the RDS.

2.6 The SPPS states that local development plans should define a network and hierarchy of centres and set out appropriate policies that make clear which uses will be permitted in the hierarchy of centres and other locations. In the smaller tier centres, policies and proposals for shops must be consistent with the aim, objectives and policy approach for town centres and retailing, meet local need and be of a scale, nature and design appropriate to the character of the settlement. Whilst inappropriate retail development in the countryside is generally resisted, the SPPS allows limited exceptions for farm shops, craft shops and shop serving tourist or recreational facilities.

Planning Policy Statements and Supplementary Guidance

2.7 The most relevant Planning Policy Statement to the subject matter of this Technical Supplement is PPS5 Retailing and Town Centres, published in 1996. However PPS5 was later withdrawn and replaced by strategic policy contained in the SPPS as outlined above.

2.8 PPS 6: Archaeology and Built Heritage sets out policies to protect buildings, archaeological features and remains and areas of historical or architectural importance such as Conservation Areas. Given that most town centres are developed around a historic core, development proposals often raise conservation issues.

2.9 Supplementary Planning Guidance includes 'Living Places: An urban Stewardship and Design Guide for NI' (2014), which sets out the key principles behind good place making, which is often of particular importance in town centres.

Local Policy Context

Legacy Area Plans

2.10 The existing Development or Area Plans that apply to Mid and East Antrim Borough are:

- **Ballymena Area Plan 1986-2001, adopted in 1989**
- **Larne Area Plan 2010, adopted in 1998**
- **Carrickfergus Area Plan 2001, adopted in March 2000**

2.11 Whilst the draft Plan Strategy has taken account of the existing Area Plans, it has also been necessary to consider their longevity and the fact that all pre-date even the original version of the Regional Development Strategy, published in 2001. They also pre-date the SPPS

2.12 The draft Plan Strategy (para 2.2.3) refers to the somewhat complex situation in regard to the status of the Belfast Metropolitan Area Plan 2015 (BMAP) which included the former Carrickfergus Borough Council area. Whilst the Carrickfergus Area Plan 2001 remains the extant statutory plan for this area, the draft BMAP (2004) as the most recent expression of local planning policy, has also been taken into account in developing the draft Plan Strategy.

Ballymena Area Plan 1986-2001

2.13 The Ballymena Area Plan acknowledged Ballymena as the main town in its borough and the focus for major commercial, retail and office development. The aim was to facilitate the development of a vibrant town centre with a full range of associated uses and to provide centrally located land for these uses while promoting good quality development to enhance the appearance of the main district town.

Larne Area Plan 2010

2.14 The Larne Area Plan acknowledged that Larne town centre and commercial core provide a wide range of administrative, educational, industrial and service facilities and includes a number of policies and proposals in relation to town centre environmental Improvement Schemes, protecting town centre housing, redevelopment schemes and control of office development

Carrickfergus Area Plan 2001/ draft BMAP (2004) in combination with the Planning Appeals Commission Inquiry report

2.15 The Carrickfergus Area Plan acknowledges that Carrickfergus town centre provides an attractive retail, tourist and general service centre, much of which is concentrated within the historic walled town, and also functions as a locally significant housing, office and cultural centre. It refers to a number of policies and proposals in relation to existing residential areas, Areas of Archaeological Potential and Development Opportunity Sites within the town centre, as well as a vision for the Maritime Area.

2.16 Part 4 Volume 4 of BMAP 2015 sets out policies for Carrickfergus Borough. The BMAP Employment Strategy seeks to sustain balanced economic growth and job creation by promoting City and Town Centres as the focus for retail and office functions. The BMAP aim for Carrickfergus is to improve the general environment, strengthen the town centre and promote the urban waterfront. It also refers to policies for the protection of town centre housing areas, areas of parking restraint, urban design criteria and protection of the historic town wall.

Mid and East Antrim Borough Council Corporate Plan 2019-2023

2.17 Our Corporate Plan sets out the Council's vision, themes and objectives that will shape our work and the services that we provide up until 2023. The aim of the Corporate Plan is to deliver the same long term vision and outcomes for the Borough that are set out in the Community Plan. The key objectives of the Plan are identified under five main themes all of which fall under the wider strategic theme to be a high performing council:

- Sustainable jobs and tourism.
- Good health and wellbeing.
- Learning for life.
- Community safety and cohesion.
- Our environment.

Mid and East Antrim Borough Council Community Plan

2.18 Our Community Plan – 'Putting People First' was published in April 2017 and covers the period from 2017 to 2032. The vision of the Community Plan is that: "*Mid and East Antrim will be a strong, safe and inclusive community, where people work together to improve the quality of life for all*". The strategic priorities set out in the Community Plan have been identified through joint working with 12 statutory partner organisations and informed by extensive consultation with the public and community and stakeholder groups. The strategic priorities are developed around the five key themes that now inform the Corporate Plan.

2.19 The Local Government Act (Northern Ireland) 2014 sets out a statutory link between the Community Plan and the LDP, in that the preparation of the LDP must take account of the Community Plan. The strategic priorities of our Community Plan have therefore been taken into consideration in the preparation of the draft Plan Strategy. As work on the LDP progresses, we will seek to deliver on any community planning outcomes where there is an identified spatial land use or local planning policy solution.

2.20 The Community Plan key theme of 'Sustainable Jobs and Tourism, seeks to promote employment opportunities in a number of sectors including the business and retail sectors.

Mid and East Antrim Borough Council Economic Development Strategy

2.21 Councils Integrated Economic Development Strategy 2018-2030 - 'Amplify' was published in 2018. It recognises that with a struggling retail sector and limited evening economy, there remains significant work to regenerate town centres and maximise their economic potential. The strategy highlights the need to think more creatively about how to make best use of our town centres. This includes improving the retail product, creating space for local events and festivals, developing a vibrant night-time economy, and encouraging more business start-up activity.

Ballymena Business Improvement District (BID)

2.22 Ballymena BID is a business-led programme which was initiated in 2015 by Ballymena businesses. The intention was to invest up to £1million over 5 years, to promote and regenerate Ballymena's town centre. The BID's vision was to create a safe, welcoming, cleaner, accessible and distinctive location for all to shop in, visit, experience and enjoy. Its aim was to encourage growth, development and investment in local businesses. The investment continues to help towards marketing, promotions and events, more accessible car parking, better signage and improving the visitor's journey, supporting town centre businesses, improving safety and security, improving the physical environment and maintaining innovation fund.

Belfast Region City Deal

2.23 Mid and East Antrim Borough Council is member of the Belfast Wider Region City Deal. City Deals are bespoke packages of funding and decision-making powers negotiated between central government and local authorities. Belfast Region City Deal sets out a plan to grow the economy, create up to 25,000 jobs, boost tourism, increase skills, encourage investment and develop infrastructure. The main economic opportunities identified in Mid and East Antrim include plans for around £80m of investment in regeneration and tourism, including the St Patrick's Barracks site in Ballymena, Carrickfergus town centre and the Gobbins. In regard to Carrickfergus town centre, priorities are to enhance the appeal of the historic environment including the castle and town wall and surroundings, high-quality public realm works, and facilitating improved access to the town centre.

Carrickfergus Townscape Heritage Initiative (THI)

2.24 Carrickfergus THI is delivered in partnership with Mid and East Antrim Borough Council and others including Carrickfergus Regeneration Partnership. Its main aim is to preserve and enhance buildings located within the town centre conservation area, through targeted THI grant assistance. It also aims to stimulate and support the wider economic regeneration of Carrickfergus through creating a quality environment and to raise awareness of the rich built and cultural heritage of Carrickfergus through a programme of training and education.

Cross Boundary Policy Context

2.25 In considering the local policy context, it is important to take account of our three neighbouring councils:

- Antrim and Newtownabbey Borough Council;
- Causeway Coast and Glens Borough Council Belfast City Council; and
- Mid Ulster District Council.

Neighbouring Council's Preferred Options Papers, supporting evidence base and published draft Plan Strategies have been taken account of, as these are regarded as the most relevant documents when considering cross-boundary issues. Because Carrickfergus falls within the Belfast Metropolitan Area, there has also been engagement with Belfast City Council and other councils in the Metropolitan area.

Table 2.1: Neighbouring Councils Position on Retailing and Town Centres	
Neighbouring Council	**Position**
Antrim and Newtownabbey Borough Council	ANBC published its draft Plan Strategy in June 2019. ANBC relevant Policies: Strategic Policy 2 – Employment, (specifically SP 2.12-2.14 –Town Centres and Retailing), DM6 – Development within Centres and DM7 – Development outside Centres. The Council's aim is to operate a town centre first approach to development of retail and other main town centre uses across the Borough through the LDP retail hierarchy, promoting town centres as the preferred locations for appropriately scaled retail, leisure, office, visitor accommodation, appropriate housing and community facilities, while recognising the complementary role of the Borough's district and local centres. A sequential test must be undertaken for proposals outside the Borough's centres and a where appropriate a Retail Impact Assessment must also be undertaken. However development at 'The Junction' Retail Outlet and Leisure Park in Antrim will be supported if it is in accordance with the terms of the Outline Masterplan approved by Council. There is a presumption against additional comparison goods floorspace, subdivision of large commercial units and removal of planning restriction for bulky goods retail. The draft Plan Strategy sets out a presumption against out of centre food store/ supermarkets in Ballyclare, Crumlin and Randalstown to avoid adverse impact on the health of the centres. Small shops are permitted in out of centre location where they are no more than 200 m2 gross floorspace and meet a local need. Retail development in villages and Hamlets is supported where it is a small scale convenience store which meets a local need. In the countryside retail and commercial facilities will be limited to proposals associated with farm diversification or tourist need.
Causeway Coast and Glens Borough Council	CCGBC POP preferred option in regard to the retail centre hierarchy is to review the Northern Area Plan's Retail Hierarchy and acknowledge the important role of village and local centres, providing a policy context for their protection. Another preferred option in regard to town, village and local centre boundaries is to progress a comprehensive and consistent approach to the designation of such boundaries in the context of 'town centre first' approach in SPPS. The preferred option for Primary Retail Cores is to allow other complementary uses provided retail remains the dominant use within the defined area. Providing policy to promote of an evening economy, by promoting a range of family friendly leisure and entertainment activities in easily accessible venues, is another preferred option. Proposals within 'Riverside' will be assessed against the SPPS approach to town centre first and on a case by case basis, taking into consideration the retail impact on Coleraine town centre and availability of alternative sites within or on the edge of the town centre. Reduction of the SPPS threshold of 1000 sq. m to 500 sq. m, for Retail Impact Assessments in smaller towns, in order to clearly differentiate from the Borough's main towns is a preferred option. Finally providing policy on acceptable location, size and function of petrol filling stations in the countryside is a preferred option to processing applications on a case by case basis.
Mid Ulster District Council	MUDC published its draft Plan Strategy in February 2019 MUDC relevant policies –Retail Hierarchy of Hubs, Local Service Centres and Countryside and a town centre first approach to retailing in 3 main towns (which have primary retail cores and associated policy). Retailing, cultural and community

	facilities, leisure, entertainment, businesses and housing facilitated outside primary retail core, which will add to the vitality and viability of the town centres, will also be permitted. Beyond town centre boundaries, proposals for retail development must demonstrate that there are no suitable sites within it, there is no impact and there is a need. Neighbourhood shops within towns are permitted up to 100 sq. m floorspace where they integrate with the residential area. Retail development in villages and small settlements are permitted where they are of an appropriate scale and don't impact on that centre or on other centres. Retail in the countryside will be restricted to farm shops, craft shops, shops serving tourist or recreational facilities or shops linked to filling stations and generally restricted to 100sqm. Finally financial and professional services are encouraged in town centres or economic development zonings and conversion from housing to offices in residential areas will be resisted.

2.24 The Council has responded to neighbouring Council's POPs and the draft Plan Strategies for Antrim and Newtownabbey and Mid Ulster as they were published. In addition, the Council is also represented on a number of working groups to discuss cross boundary issues, for example the Metropolitan Area Spatial Working Group and Lough Neagh Forum.

2.25 Members of the plan team have also met with officials in the three neighbouring councils during preparation of the POP. In preparation for the draft Plan Strategy, members of the plan team met again in July 2019 with officials in the three neighbouring councils to outline the various broad approaches of the draft Plan Strategy and to discuss cross-boundary issues. During these discussions, the broad approach of the Retail Strategy was discussed and no issues of conflict were raised.

2.26 In consideration of neighbouring Councils development plan documents and discussions held with them, it is the opinion of this Council that there is no conflict with our draft Plan Strategy, insofar as it relates to Retailing and Town Centres.

3.0 Retailing and Town Centre Profile

Town Centre Assessment

3.1 This section of the technical supplement is an update from Position Paper 4 'Town Centres and Opportunity Sites' published in March 2015. It includes an overview of the town centre health check exercise which assessed the vitality and viability of the three main town centres. Health check definitions are provided in the Retail Study Pages 24-26.

Ballymena Town Centre

3.2 Maps 1.1-1.3 in Appendix B illustrate the land use surveys which were carried out by the Plan team in March 2018. They show the ground, first and second floor uses for all units within Ballymena town centre boundary as defined in the Ballymena Area Plan 1986-2001. Figure 3.1 below shows the number of units present for the various town centre uses in Ballymena in March 2018 and provides a comparison with Northern Ireland as a whole and the UK.

Fig 3.1 Ballymena Town Centre Composition

Ballymena	Units (#) 2018	Units (%) 2018	Units (%) NI Avg.	Units (%) UK Avg.
Convenience	29	4.8	7.5	9.0
Comparison	184	30.5	33.2	30.8
Retail Services	109	18.1	12.8	14.5
Leisure Services	88	14.6	19.3	24.0
Financial and Business Services	68	11.3	9.2	10.3
Miscellaneous	0	0	0	0.1
Vacant	125	20.7	18.1	11.2
TOTAL	**603**	**100**	**100**	**100**

Source: Mid & East Antrim Borough Council, 2018 & Experian, 2018

Table 3.1 Health Check Assessment for Ballymena Town Centre

Description	Ballymena is the main town and largest settlement within MEA Borough with a population of 29,467. Ballymena town centre is broadly defined by Parkway to the north, the A26 to the west, Braid River in the south and Broughshane Street/Church Street to the east. Ballymena is identified as being a Sub Regional Town and Main Hub in the Regional Development Strategy. The town has an excellent location on the edge of BMUA with easy access to ports and airports. The town is located on the main route between Belfast and the important tourism attractions of the north coast.

Overall Composition	Ballymena town centre is the largest in MEA borough, and had 603 retail units within the town centre at the time of the town centre health checks in March 2018. Ballymena has the most comprehensive and diverse offer of retail and services of the three main towns in the borough and as a result, is the most popular of three. There are two main shopping centres within the town centre boundary; the Fairhill Centre and the Tower Centre. The Fairhill Centre in particular is very popular, although it is located towards the edge of the town centre boundary. The Braidwater Retail Park is also located on the edge of the town centre boundary, partially in, and partially out.
Convenience & Comparison	Just 4.8% of retail units are convenience goods units which is significantly below the NI average of 7.5% and the UK average of 9.0%. This low proportion of convenience goods in the town centre is a general trend across the Borough. This is partly due to the prominence of large format convenience retail in the Borough, and the dominance of mostly out of centre supermarkets. In Ballymena for example, Tesco is located out of the town centre at Larne Road Link dominates the convenience goods market. Historical composition data for Ballymena indicates that the proportion of convenience goods stores has fallen by 1.4% since 2012 (Experian, 2012). Conversely, Ballymena's comparison goods offer of 30.5% of units is very similar to the UK average of 30.8%, and just lower than the NI average of 33.2%. The town dominates the comparison goods shopping patterns of residents from the Borough across most categories of

	comparison goods, indicating that the comparison goods market in Ballymena is very strong. Historical composition data for Ballymena indicates that in 2012, 34.6% of units were comparison goods units.
Services	Ballymena town centre has a higher than average proportion of retail services and a lower than average proportion of leisure services. The proportion of financial and business services is marginally higher than both the NI and UK averages. In terms of retail services, Ballymena town centre has a proportion of 18.1% retail services units. This is higher than the NI average of 12.8% and the UK average of 14.5%.This is a trend present in all three MEA town centres. Turning to leisure services, Ballymena has a lower proportion of leisure services in the town centre (14.6%) compared with the NI average of 19.3% and the UK average of 24.0%. Again, this is a trend across all three town centres within MEA.
Vacancies	Ballymena town centre has a high proportion of vacant units within the town centre, with 20.7% of units vacant in March 2018. This is above the NI average of 18.1% and the UK average of 11.2%. Notwithstanding, Ballymena had the lowest vacancy rate of the three main town centres in MEA and has seen a slight reduction in vacancies since 2012 when the Experian survey found 22.7% vacant units.
Retailer Representation	Ballymena town centre includes an extensive list of national multiples and major retailers, testimony to Ballymena being the largest centre within the Borough. In March 2018 some 76 national multiples and major retailers were present, including H&M, Superdrug, EE, New Look, Next, Primark, River Island and Topshop. Experian's Goad Category Report identify a list of 30 national multiples as major retailers. These are considered to be retailers that are most likely to improve the consumer appeal of a centre. Ballymena Town Centre includes 22 such retailers.
Average Prime Rents	£150 per square metre pa (propertypal.com)
Accessibility	Ballymena town centre is reasonably well serviced by public transport, and the railway station is located a 3-7 minute walk from the town centre. Train services link Ballymena with Belfast and Londonderry and operate daily. There are four main bus routes into the Town Centre, with 36 services operating each weekday, and 23 services on Saturdays. These bus routes do not operate on Sundays. There are also Ulsterbus Services servicing 14 destinations, and Goldline services to Belfast daily. Park and Ride Facilities are located at the bus/train station off Princes Street and also Ballee Park and Ride on Antrim Road off A26/ Ballee Roundabout.

	The town centre is well catered for in terms of car parking, with the Systra Parking Study Baseline Report, January 2018, identifying 3,320 car parking spaces, 1,986 of which are in Council run car parking spaces, and 1,244 spaces within private car parks.
Footfall	The walk in routes from surrounding residential areas to Ballymena town centre are relatively clean and graffiti free, with a good level of lighting. Footpaths are of a reasonable to good width and surfaces are of a good standard, suitable for pushchairs/wheelchairs, especially on the streets where the recent public realm works have been carried out. Bridge Street/ Linenhall Street and George Street are traffic dominated with up to 4 lanes of traffic as the A26 main traffic route runs through the south western corner of the town centre. This may contribute to high vacancy on these three streets. Footfall counts were undertaken between Ballymena town centre and Braidwater Retail Park at two locations. A count was undertaken of people moving between Bridge Street and Braidwater Retail Park in both directions. The results showed in general that there were more people travelling from Bridge Street to the Retail Park than the opposite. The second count was carried out of people travelling from James Street, in Harryville into Braidwater Retail Park. Counts were taken on Thursday and Saturday, and it was generally observed that more people used this route on Saturdays.
Physical Structure and Constraints	The Ballymena Flood Map shows potential for some minor river flooding in proximity to the River Braid, and in the north west segment of Ballymena. There is potential for surface water flooding at isolated locations throughout the town centre. The Ballymena constraints map identifies defence and industrial heritage assets, sites and monuments, and listed buildings. These assets are located throughout the centre, constraining development in some parts of Ballymena. A Tree Preservation Order exists along the stretch of the Ballymoney Road which falls within the town centre boundary. Map 4.1 and 4.2 in Appendix B illustrates such constraints around Ballymena town centre.
Perception of Crime and Safety	The Town Centre Database, published by the Department of Communities reports that in 2018 there were 1,633 incidences of crime within Ballymena Town Centre. Of the total crimes, 30% were listed as anti-social behaviour, 17% were violence and sexual offences, and 26% were shoplifting.
Environmental Quality	Public Realm works have recently been completed on Church Street, Wellington Street, Ballymoney Street and Broughshane Street, including widening and re-surfacing of footpaths, soft landscaping, reduction of on-street parking, and installation of street furniture. Most central parts of the town centre were found to be a good standard.
Stakeholder Feedback	Stakeholder feedback and discussion identified a desire for additional small scale convenience supermarkets within Ballymena town centre

to facilitate top-up shopping for workers and those visiting the town centre

Stakeholder feedback also indicated some support for encouraging smaller businesses and start-ups in vacant units in the town centre, with lower than normal rents or other incentives. This would provide an opportunity for smaller businesses as well as filling vacant units, which would in turn, improve the perception of the town centre.

There was also a point made about bringing interesting and different stores into Ballymena. At the moment stores like Smiggle, Build a Bear and Tiger are all present in Belfast, and therefore people will travel to Belfast specifically to visit those stores. Should such stores be present in Ballymena, that spend would be likely to be retained within the town centre and the Borough.

Carrickfergus Town Centre

3.3 Maps 2.1-2.3 in Appendix B illustrate the land use surveys which were carried out by the Plan team in March 2018. They show the ground, first and second floor uses for all units within Carrickfergus town centre boundary as defined by draft BMAP 2004. Figure 3.2 below shows the number of units present for the various town centre uses in Carrickfergus in March 2018 and provides a comparison with Northern Ireland as a whole and the UK.

Figure 3.2 Carrickfergus Town Centre Composition

Carrickfergus	Units (#) 2018	Units (%) 2018	Units (%) NI Avg. 2018.	Units (%) UK Avg. 2018
Convenience	12	5.0	7.5	9.0
Comparison	48	19.9	33.2	30.8
Retail Services	52	21.6	12.8	14.5
Leisure Services	30	12.5	19.3	24.0
Financial and Business Services	30	12.5	9.2	10.3
Miscellaneous	0	0	0	0.1
Vacant	69	28.6	18.1	11.2
TOTAL	**241**	**100**	**100**	**100**

Source: Mid & East Antrim Borough Council, 2018 & Experian, 2018

Table 3.2 Health Check Assessment for Carrickfergus Town Centre

Description

Carrickfergus is located in the south east part of Mid & East Antrim, and is a coastal town. At the time of 2011 Census, the town had a population of 27,903 people, making it the second largest settlement in the Borough.

Carrickfergus Town Centre is defined by the railway line to the north and the coastline to the south. Ellis Street defines the western boundary and the eastern side bounds Shaftesbury Park.

Carrickfergus is a key coastal location within the Belfast Metropolitan Urban Area. With a vibrant marina, waterfront development and historic castle it is a significant heritage centre, assisted by good transport links with Belfast and Scotland via Larne and also its location on the Causeway Coastal Route.

Overall Composition

The Carrickfergus Town Centre composition varies quite considerably from both NI averages and UK averages. The headline figures are the particularly high vacancy rate which is significantly higher than both the NI and UK averages. In addition, the town centre has a high proportion of retail services and low proportion of leisure services when compared with both the NI averages and UK wide averages.

Convenience & Comparison	In 2018, there were 12 convenience units counted in Carrickfergus, equating to a proportion of 5.0% of the overall retail units within the town centre boundary. This proportion is lower than both the NI average of 7.5% and the UK average of 9.0%. This low proportion of units is due to the dominance of two large supermarkets within the Town Centre boundary –Sainsbury's and Tesco. Historical composition data from Experian shows that in 2012, Carrickfergus had 4.5% convenience units. Carrickfergus also has a lower proportion of comparison units than both the NI average (33.2%) and UK average (30.8%), accounting for just 19.9% of retail units within the town centre. Historical data from Experian shows that in 2012, 30.5% of units were comparison goods, an indication that the town centre has struggled to retain comparison retailers in the period in between. The low proportion of both convenience and comparison retailers within the town centre indicates that there is a deviation from typical town centre retailing opportunities within Carrickfergus Town Centre.
Services	At the time of the Council's survey, retail services units accounted for 21.6% of retail units within the town centre. This is considerably higher than the NI average of 12.8% and the UK average of 14.5%, and an indication that the town centre is not as healthy as it could be. The majority of retail services units were health and beauty units. Leisure services accounted for 12.5% of retail units in the town centre, below the NI average of 19.3% and the UK average of 24.0%. As previously noted this is common to all MEA town centres, indicating that NI centres have not yet reached the same representation of leisure services, such as restaurants and cafes, as other town centres in the UK. Carrickfergus Town Centre had a proportion 12.5% financial and business service units, which is slightly higher than the NI and UK averages.
Vacancies	Carrickfergus has a concerning level of vacant units within the town centre with more than a quarter of retail units within the town centre currently vacant (27.9%). This is well above the NI average of 18.1%, which is in itself above the UK average of 11.2%. Historical composition data indicates that in 2012 there was a proportion of 25.4% vacant units in Carrickfergus Town Centre. The proportion of vacancies is evident and noticeable when visiting the centre, and achieving a reduction in vacancies should be a made a priority.

Retailer Representation	Carrickfergus Town Centre includes only six retailers that are on Experian's major retailer list. These include Argos, Boots, New Look, Sainsbury's, Superdrug and Tesco. Attracting other major retailers to Carrickfergus Town Centre is likely to benefit the overall perception of Carrickfergus and may help to attract more visitors into the town centre.
Prime Rents	£90-£100 per square metre pa (propertypal.com)

Accessibility	Both walk in routes and car parking provision are considered to be adequate within the centre, and there are 1,078 car parking spaces throughout the town (551 Council run, and 527 private spaces). Park and Ride facilities are available at Carrickfergus train station. Parking facilities are considered to be well signed throughout the town. The town also has a railway station approximately 0.2 miles from the town centre that provides services to Belfast. On weekdays there are 36 services to Belfast, whilst there are 30 services on Saturday and 14 services on Sunday. Regular bus services connect Carrickfergus with the surrounding towns from the train station site.
Footfall	In April 2018 there was limited footfall noted in the core Carrickfergus Town Centre. Other parts of the centre including Tesco and Sainsbury's were noted to have higher levels of footfall. An important step to increasing the number of visitors to the town centre may be to encourage customers of those larger supermarkets on the edge of the town centre to link their trips with visits to stores or services within the core town centre area.
Physical Structure and Constraints	The Flood Map shows the potential extent of coastal flooding along the coast, which can impact southern parts of the town centre. The map also shows some incidence of surface water flooding throughout the town centre. The Carrickfergus Constraints map identifies defence and industrial heritage assets, sites and monuments, and listed buildings. These assets are located extensively throughout the centre, constraining development in some parts of Carrickfergus. A Conservation Area incorporates most of the town centre east of and including the Town Wall. In addition, the majority of the town centre is included within the Area of Archaeological Potential, and parts of the centre are included in an Area of Special Scientific Interest. Carrickfergus Castle is designated as a historic monument in state care. Map 4.3 and 4.4 in Appendix B illustrates such constraints around Carrickfergus Town Centre.
Perception of Crime and Safety	The NI Town Centre Database identifies that in 2018 there were 484 incidences of crime in Carrickfergus Town Centre, up from 378 incidences in 2015. 54% of the incidences in 2018 were classed as anti-social behaviour, 16% were classed as violence, and 5% were classed as shoplifting. The overall perception of safety in Carrickfergus would be improved with a reduction in the level of vacant units, and with improved footfall into the core parts of the town centre.

Environmental Quality	The environmental quality of Carrickfergus Town Centre suffers due to the overall number of vacant units. However, there is still potential for the town centre environment to be significantly improved. It is understood that public realm works over the last decade have improved the environmental quality of the town centre, and that more work is to be undertaken. Carrickfergus town centre is an area with important historical character and value. There are a number of historic sites and monuments and listed buildings throughout the centre, which is within a designated conservation area. The historic environment is both an opportunity and a constraint in terms of further development within the town centre, but overall, it offers significant potential to be utilised more fully to improve the quality of the built environment within the town centre and to strengthen its economic base.
Stakeholder Feedback	Stakeholder feedback highlighted a need to improve the image of Carrickfergus in order to attract businesses into the town centre. Improved branding and marketing were seen as important in this context. Stakeholders also considered that there is an opportunity to tap into the tourist market which is perceived as under-developed. Currently those visiting Carrickfergus Castle are unlikely to also visit shops in the town centre as there is little incentive to do so and the Marine Highway may be something of a physical barrier. Providing links and incentives to also make the trip into the town centre would be an important step towards increasing footfall.

Larne Town Centre

3.4 Maps 3.1-3.3 Appendix B illustrate the land use surveys which were carried out by the Plan team in March 2018. They show the ground, first and second floor uses for all units within Larne town centre boundary as defined by the Larne Area Plan 2010. Figure 3.3 below shows the number of units present for the various town centre uses in Larne in March 2018 and provides a comparison with Northern Ireland as a whole and the UK.

Fig. 3.3 Larne Town Centre Composition

Larne	Units (#) 2018	Units (%) 2018	Units (%) NI Avg.	Units (%) UK Avg.
Convenience	17	6.0	7.5	9.0
Comparison	77	27.1	33.2	30.8
Retail Services	54	19.0	12.8	14.5
Leisure Services	42	14.8	19.3	24.0
Financial and Business Services	32	11.3	9.2	10.3
Miscellaneous	0	0	0	0.1
Vacant	62	21.8	18.1	11.2
TOTAL	**284**	**100**	**100**	**100**

Source: Mid & East Antrim Borough Council, 2018 & Experian, 2018

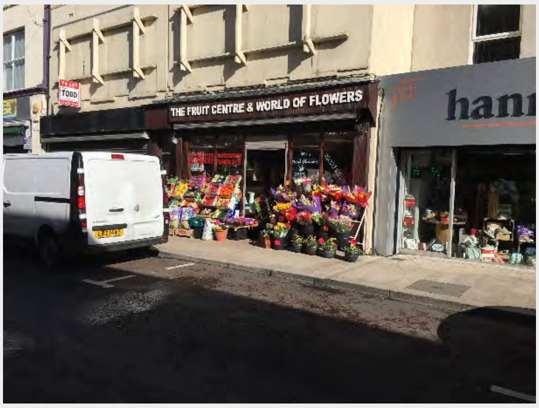
Table 3.3 Health Check Assessment for Larne Town Centre

Description

Larne is located on the coast, on the eastern boundary of the Mid & East Antrim Borough. It is the second largest sea port in Northern Ireland. At the time of the 2011 census, Larne had a population of 18,705, making it the third largest town within the Borough, behind Ballymena and Carrickfergus.

Larne town centre is defined broadly by Victoria Road to the north, extending to the junction of Main Street and Glenarm Road to the east, following Circular Road to the south and includes land to the south of the Harbour Highway to the west.

Larne is identified in the RDS as a ‘main hub’ and a ‘gateway’ due to its strategic coastal location and its status as the second largest port in Northern Ireland. The town is located on the Causeway Coastal Route. Larne bus and railway station is located approximately 0.3 miles from the Town Centre and regular train services connect the town with Belfast.



Overall Composition	Larne town centre had a total of 284 retail units within the town centre boundary in March 2018. The headline points are that Larne Town Centre has lower than average proportion of convenience units, comparison units and leisure services, and higher than average retail services and vacant units. Overall the centre has a diverse range of shops, albeit that the breakdown of categories diverges slightly from both the Northern Ireland averages and the UK averages.
Convenience & Comparison	In March 2018, there were 17 convenience units, accounting for 6.0% of the total units. This is below the NI average of 7.5% and the UK average of 9.0%. This is due in part to the prominence of large format supermarkets in Larne such as ASDA at Redlands, which dominate the convenience goods market. As such there are fewer convenience units in total, and the town is reliant on out of centre convenience supermarkets. Comparison goods units account for 27.1% of the total units. This proportion is below the NI average of 33.2% and the UK average of 30.8%. This proportion is down from the 2009 Experian Goad survey which identified 33.9% comparison units indicating that there has been an overall reduction in the comparison goods units in the period between 2009 and 2018.
Services	Larne has a strong offer of retail services (19.0%) and financial and business services (11.3%), both above the NI averages and UK averages. As has been seen across all three main town centres within MEA Borough, Larne has a lower proportion of leisure services within the town centre (14.8%) compared with the NI average of 19.3%, and the UK average of 24.0%.
Vacancies	In March 2018, Larne had 62 vacant units, resulting in a proportion of 21.8%. This is higher than both the NI vacancy average of 18.1% and the UK average of 11.2%. According to the GL Hearn Northern Ireland Town Centre Study of 2014, historic vacancy rates have been higher, at 26% in 2007. Subsequently in 2012 there were 21% vacant units, so there has been no significant change in the past six years.
Retailer Representation	Larne Town Centre includes seven retailers that are on Experian’s major retailer list, including Argos, Boots, Carphone Warehouse, New Look, O2, Superdrug and Tesco.
Prime Rents	£120-£140 per square metre pa (propertypal.com)

Accessibility	The town centre benefits from a bus and railway station located 0.3 miles from the town centre. Furthermore, there are 951 car parking spaces in the centre, 596 of which are Council run, and 355 privately run. Footpaths were generally seen to be adequate, although it has been noted that some walk in routes would benefit from lighting and improved pavement.
Footfall	Main Street was perceived as being the most popular part of the town centre along with Laharna Retail Park which offers a large quantity of car parking.
Physical Structure and **Constraints**	The Flood Map shows potential for some limited river flooding in Larne, particularly in areas to the south of Harbour Highway. Surface water flooding can occur throughout the town centre. The Larne constraints map identifies defence and industrial heritage assets, sites and monuments, and listed buildings. These assets are located throughout the centre, constraining development in some parts of Larne. Map 4.5 and 4.6 in Appendix B illustrates such constraints around Larne town centre.
Perception of Crime and Safety	According to the Town Centre database, there were 429 incidences of crime within Larne Town Centre in 2018. 44% of those incidents were anti-social behaviour, 22% were violence and sexual offences, 10% criminal damage and arson, and 11% were shoplifting.
Environmental Quality	Larne town centre is considered to have a good level of environmental quality, with an attractive High Street and good quality pedestrian paths. A concerted effort by local group Larne Renovation Generation to improve the urban environment in Larne has resulted in a series of small scale projects across the town centre. The group use crowd funding, and aim to turn Larne into '*a creative cultural hub for all the local people and tourists to enjoy*'.
Stakeholder Feedback	Stakeholders perceived that there is tourist market that currently bypasses Larne. Tour groups that pass through and stay in local hotels tend not to come into the town centre. Encouraging tour groups to utilise shops and services within Larne Town Centre was mentioned as being important. It was also acknowledged that facilitating residential development within the town centre may help to increase footfall and patronage, particularly where it is possible to turn vacant units above shops into residential apartments. A further factor identified was the need to improve the overall image of Larne town centre This could be achieved by improving town centre marketing and branding, with a view to improving the town centre vibrancy in order to attract visitors, and importantly, customers, into the town centre.

4.0 Mid and East Antrim Retail and Commercial Leisure Need & Capacity Study

4.1 Nexus Planning were commissioned by Mid and East Antrim Borough Council in February 2018 to undertake a Retail and Commercial Leisure Need and Capacity Study for the borough, to form part of the evidence base for the Local Development Plan. The scope of works included a review of policy and market trends, a retail and Leisure capacity assessment, and assessment of need for additional retail and leisure floorspace, town centre health check (led by the plan team) and policies and proposals guidance. The study is supported by new empirical research, with NEMS Market Research Ltd undertaking surveys of 800 households within a defined study area in February 2018. The study area encompassed eight zones based on postcode sectors, grouped to reflect areas that are expected to exhibit similar patterns of shopping behaviour. For each zone 100 surveys were undertaken. To complete the study, Nexus examined land use data provided by Council, along with NISRA and Experian population and expenditure data to establish the up-to-date position with regard to convenience and comparison retail and leisure capacity. The full report is attached in Appendices C and D (see separate documents).

Main Findings

Town centre performance Benchmark

4.2 The Retail Study, (page 61-63) compares the composition of our 3 main towns in terms of numbers of Convenience, Comparison, Retail Services, Leisure Services Financial and Business Services, Miscellaneous and Vacant units and benchmarks these against towns of a similar size in both Northern Ireland and the UK. The study concludes that MEA centres tend to have a lower proportion of convenience goods units, due to the dominance and popularity of (mainly) out of centre supermarkets, such as Tesco Superstore outside of Ballymena Town Centre, and Asda Supermarket outside of Larne Town Centre. This means that smaller convenience units such as bakeries, butchers, grocery stores and newsagents struggle to compete and therefore are fewer in number. In terms of comparison units, Ballymena is slightly below the Northern Ireland average but in line with the UK average, Larne has slightly lower than both NI and UK averages while Carrickfergus has significantly less comparison units than the average number in either NI or the UK. A higher than average proportion of retail services units is noted however in all three main towns. In contrast there is not yet the same prominence of leisure services in town centres, when compared against similar sized centres in both Northern Ireland and England.

Retail Turnover

4.3 The Retail Study examines each main town centre's 'Retail Turnover' for Convenience and various Comparison type goods, by destination within the town centre. In Ballymena Clothing and Footwear spend has a significant portion of the overall spend at 33.5%, followed by convenience goods at 17% and household and recreation goods at 13% and 12.6% respectively. Carrickfergus is a very different picture with the vast majority of the spend (77.6%) on convenience goods with the next closest being clothing and footwear at 5.8%. Larne is different again with 32.2% convenience spend followed by 23% on clothing and footwear and 14% on Household goods. The relevant tables in the Retail Study are on page 32 for Ballymena, page 44 for Carrickfergus and page 55 for Larne.

Expenditure Retention

4.4 The Retail Study then explains how a Household Telephone Survey of 800 homes investigated whether the current retail provision in the town centres satisfied the level and nature of consumer demand and looks at the amount spent on Convenience and Comparison goods in the three main towns.

4.5 In Ballymena town centre (includes Sainsbury's at Braidwater) convenience spend of residents in zones 2,3 and 4 which cover Ballymena town, was £44.5m (26.2% retention rate) out of a total convenience spend of £178m highlighting the strength that Tesco at Larne Link Road, has in the convenience market in Ballymena. Comparison spend in the town centre was much better at £188m out of a total spend of £243m, a retention rate of 77.5%. (pages 33-34 of retail study)

4.6 In Carrickfergus (zone 6) convenience spend in the town centre accounts for 71% of the retention rate at almost £69m out of a total spend of £97m. In stark contrast comparison spend has only a 15.3% retention rate at £20m out of a total £131m. (pages 45-46 of Retail Study)

4.7 In Larne convenience spend in the town centre only accounts for £12.1% of the retention rate at £6.8m out of a total convenience spend of £56.4m, again highlighting the strength of the out of centre Asda at Redlands. The picture regarding comparison goods expenditure is slightly better with 46.3% of zone 5 residents' expenditure being retained in Larne town centre at £40m out of a total spend of £86.5m (pages 56-57 of Retail Study)

Leisure

4.8 Finally for each main town the Retail Study outlines the most popular leisure activities for local residents and expands on what leisure facilities residents would like to see more of or improved in each area.

4.9 In the Ballymena zones (2, 3 &4) the most popular leisure activity at 57.7% was visiting restaurants followed by visiting the cinema at 30% and outdoor activities at 25.7%. When asked what improvements were needed in the area 9.3% of respondents indicated better children's activities and facilities however 51.3% stated that there were no facilities they would like to see more of/ improved. (See pages 35-36 of Retail Study)

4.10 In Carrickfergus the most popular leisure activity for residents in zone 6 was again visiting restaurants at 65% followed by outdoor activities at 43% and visiting the cinema at 41%. Again more children's facilities/activities was the most popular improvement voiced at 10% followed by better shopping facilities at 9%. Notably 53% of respondents stated that there were no leisure facilities needing improvement. (See pages 47-48 of Retail Study)

4.11 As was seen in the other towns, visiting restaurants was the most popular leisure activity at 68%, followed by outdoor activities at 42% and visiting the cinema at38%.Once again children's facilities/activities was the most requested improvement, however 45% of respondents were satisfied with the existing leisure offer. (See pages 58-59 of Retail Study)

Retail and Commercial Leisure Assessment (Page 64 of Retail Study)

4.12 One of the key aims of the Retail Study was to provide recommendations on the capacity for new retail and leisure floorspace over the plan period to 2030. The methodology for working out Retail capacity modelling follows a consistent, robust methodology which incorporates a number of datasets and informed assumptions which are described in detail in the Retail Study but broadly speaking:

Available Expenditure – Turnover of Existing Stores/Centre – Commitments = Surplus or Deficit

Capacity for Future Convenience Goods Floorspace (Page 65 of retail study)

4.13 Based on the household survey, convenience retailers in the Borough turnover an estimated £314.9m. This is significantly higher than the benchmark turnover of £209.4m (see Table 5 at Appendix D of Retail Study). Once inflow expenditure of £10.7m is added on, this overtrade equates to £116.2m of additional expenditure across the Borough at 2018. Put another way, the combined existing convenience stores are trading at around 55% above company average expectations. Figure 4.1 of the Retail Study identifies a surplus of £116.2m expenditure in 2018, increasing to £123.1m by 2030.

4.14 Committed and extant planning permissions for new convenience floorspace across the Borough are then considered. Forecasted expenditure of £11.1m generated from these commitments is deducted from the surplus expenditure. (Figure 4.2 of the retail study). This gives a 'Residual Expenditure' figure which is then converted into net additional minimum and maximum convenience goods capacity (in square metres) for Mid & East Antrim Borough over the plan period. Over the Borough the additional floorspace capacity in 2018 is min. 9,000sq.m to max. 11,500 sq. m. These figures are forecast to increase by 100-200 sq.m every 4 years until 2030. (Figure 4.3 of retail study).

4.15 The Borough-wide figures are then looked at as to how this capacity might be distributed on a town-by-town basis. This exercise is carried out in Tables 6e – 6t at Appendix D of the Retail Study. Floorspace capacity is apportioned based on existing market share of the Borough. This exercise shows that stores and centres in the Borough attract 67.1% (£314.9m) of the total available convenience goods expenditure of residents of the Study Area (£469.0m). This market share is broken down as follows between the towns of the Borough:

Ballymena – 27.2%, Carrickfergus – 18.7%, Larne – 11.3%, Rest of the Borough – 10.0%

Capacity for Future Comparison Goods Floorspace (Page 70 of Retail Study)

4.16 The methodology for calculating capacity for comparison goods floorspace differs from that used to model capacity for convenience goods floorspace. The principal reason for this is that there are no robust, industry standard benchmark sales densities for calculating the turnover of smaller independent retailers that typically make up the majority of the comparison provision of town centres. A standard approach is adopted that assumes that comparison goods retailers across the Study Area are trading 'at equilibrium', meaning the survey derived turnover of each facility is adopted, and capacity is examined by measuring the growth in available expenditure to 2030.

4.17 The retail study identifies a surplus of £13.2m by 2022, £32.6m in 2026 and £58.6m in 2030. Committed and extant permissions are then considered for new comparison retail floorspace across the borough that could come forward over the next few years. This includes any developments which are currently under construction, or have begun since February 2018, and so would not have been operating at the time of the household telephone survey. In total, these committed developments equate to a net comparison goods floorspace of 1,011 sq. m and an estimated turnover of £4.5m (see Table 26c at Appendix D of Retail Study). These commitments are deducted from the surplus expenditure. Once accounted for, the net comparison goods capacity can then be calculated.

4.18 Taking account of committed turnover (see Table 26c at Appendix D in Retail Study), residual expenditure is identified to range from £-4.5m in 2018 to £8.1m in 2022, £26.8m in 2026, and £52.1m in 2030. Positive capacity is forecast as the turnover of the range of commitments is less than the amount of expenditure growth.

4.19 Using average sales densities to calculate a minimum floorspace scenario (£3,500/sq. m at 2018) and a maximum floorspace scenario (£5,500 /sq. m at 2018), capacity in the Borough for additional comparison goods is calculated. This is after factoring in the current range of committed developments. Population and expenditure growth are higher than projected turnover efficiency of commitments, and therefore there is positive floorspace capacity to 2030. Although there is no capacity for comparison goods floorspace in 2018, a capacity of min. 1,300sq.m to max 2,100 sq. m is forecast by 2022, rising to 3,800-6,000 sq. m in 2026 and 6,600 -10,300 sq. m in 2030.

4.20 In a similar fashion to the assessment of convenience goods, the Borough-wide figure is then looked at to see how this capacity might be distributed on a town-by-town basis. This exercise is carried out in Tables 26e – 26t at Appendix D of the Retail Study. The floorspace capacity is apportioned based on existing market share performance from the Study Area. This exercise shows that stores and centres in the Borough attract 53.1% (£347.0) of the expenditure carried out by residents of the Study Area (£653.5m). This market share is broken down as follows between the towns of the Borough:

Ballymena – 40.2%, Carrickfergus – 3.3%, Larne – 8.0%, Rest of the Borough – 1.5%

Capacity for Future Leisure Floorspace (Page 74 of retail study)

4.21 The results of the NEMS Household Survey offer an indication of locations/facilities where residents of the Study Area satisfy their leisure and cultural needs. As such, the Survey enables us to analyse patterns of travel and potential deficiencies (those that are qualitative in nature) in the Borough.

4.22 The modelling of future commercial leisure need cannot necessarily be based upon the same quantitative model used to estimate retail need, by estimating future expected expenditure. This is because leisure spending is not undertaken regularly and is typically influenced by external factors. The inherent nature of restaurant, café and bar spending is that it is often undertaken whilst travelling, on holidays and day trips and for special occasions and, as such, patterns of spending are generally dispersed widely across and, in part, beyond the Study Area.

4.23 In order to identify capacity for leisure activities, population projections are utilised for each zone. As Zones 1-6 have been identified to broadly represent the Borough, leisure capacity is based on the combined population of these zones, and projected forward to identify capacity for 2018, 2022, 2026 and 2030.

Health and Fitness Capacity

4.24 The household survey results suggest that 70.2% of residents within the borough currently carry out their health & fitness activities within the Borough. This is termed as the 'retention rate' and is used as a benchmark (assumed to be constant) to underpin the assessment of the number of additional facilities that can be supported in the Borough over time. Based on current and projected borough population and the current retention rate identified above, it is calculated that the Borough could support around 12 health and fitness clubs at the current time, remaining the same until 2030.

4.25 There are three publically run leisure centres within Mid and East Antrim Borough including Seven Towns Leisure Centre in Ballymena, Amphitheatre Wellness Centre in Carrickfergus, and Larne Leisure Centre. Research indicates that there are another 29 health and fitness clubs within the Borough. These are varying in size and include a mix of chain and independent clubs, totalling 32 different facilities across the Borough. The current provision is therefore well above the existing demand for 12 health and fitness clubs. Accordingly, limited population growth over the 12 year period to 2030, limited additional demand is forecast by 2030.

Cinema Capacity

4.26 The Borough has the following cinemas:

IMC Multiplex Cinema, Ballymena (7 screens)

Omniplex Cinemas, Carrickfergus (6 screens)

Omniplex Cinemas, Larne (8 screens)

4.27 The NEMS Household Survey estimates that cinemas across the Borough attract 80.1% of all cinema trips made by the boroughs residents. In 2016, the Cinema Advertising Association identified that total cinema admissions were 168.3 million with the national average being 2.6 trips per person.

4.28 In order to gauge the number of cinema screens that can be supported by the Borough, the anticipated cinema attendance has been calculated (based on the national average of 2.6 trips per person). The Borough's current cinema trip retention has also been taken into account (80.6% of all cinema trips).

4.29 The benchmarking exercise in relation to population growth, estimates that (taking retention rates into account) there would be around 434,252 admissions in 2018, and that by 2030 this would increase to around 446,243 admissions. Based on the national average of 40,000 trips per screen, we are then able to calculate the number of screens that can be supported in the area.

4.30 The study illustrates that 8 cinema screens can be supported by borough residents in 2018, increasing to 9 cinema screens in 2030. At present there are three cinemas in the Borough, providing a total of 21 screens in total, which, if utilising national averages, is well above the requirement for the Borough. As such, we would not recommend that any additional cinemas are planned for in the Plan period.

Ten Pin Bowling Capacity

4.31 In terms of data on ten pin bowling trends in the UK, Mintel are one of the only providers. As such, Mintel research has provided a general indication of the average number of ten pin bowling lanes per

4.32 There are presently no ten pin bowling destinations within MEA Borough or within the Study Area and therefore the Borough does not have a retention rate. The most popular destination for ten pin bowling with respondents to the Household Survey was Glengormley Sports bowl in Newtownabbey.

4.33 The retail study indicates that if the Borough were to retain 100% of visits to Ten Pin Bowling destinations, that there is presently the capacity for a facility with 15 bowling lanes. However, as there are a number of ten pin bowling facilities outside of the Study Area, we cannot assume that a new facility would actually retain 100% of trips. Notwithstanding, capacity for a small bowling facility does exist.

4.34 It should also be noted that certain parts of the Borough were particularly eager to see a new Ten Pin Bowling facility, as seen in the results in the results of the NEMS Household Survey. 4.7% of all respondents, and in particular, 13.0% of respondents from Larne, indicated that they wished to see a new or improved ten pin bowling facility (Figure 3.22 in Retail Study).

4.35 However, with demand falling in general, and with there being a number of nearby alternatives outside the Study Area, the Retail Study would not recommend that the Council plan for any specific facilities at this time. Should investors come forward within the Borough for a new facility, applications would be considered on their merits.

4.36 The Retail and Commercial Leisure Need and Capacity Study was instructed to inform the evidence base to support the emerging Retail and Town Centre policies in the Local Development Plan for a period up to 2030. The Study based its findings on an assessment of existing market shares and population/expenditure growth to calculate what potential cumulative capacity there is for additional retail and leisure floorspace within the borough over the plan period. A summary of their recommendations with regard to retail and leisure floorspace capacity is as follows:

- There is quantitative capacity for more convenience goods floorspace, but a ‘town centre first’ site search must be followed. Ballymena Town Centre and Larne Town Centre are both obvious locations for additional convenience floorspace.

- There is quantitative capacity for more comparison goods floorspace to 2030. However, as the capacity to 2030 isn’t excessive, the Council should be cautious about permitting any further sizable comparison goods proposals and should look to fill existing vacant retail units in all three town centres as a priority. A ‘town centre first’ policy should applied to all new comparison development.

- There is limited capacity for leisure floorspace to 2030, with our review of provision of health and fitness centres, cinema screens and ten pin bowling lanes showing that there is currently an oversupply of cinemas and health and fitness centres. There is not currently a ten pin bowling destination within the Borough, however as interest in ten pin bowling is generally declining, any future plans for ten pin bowling centre should be tentative and market driven.

5.0 Preferred Options Paper

5.1 Council published its Preferred Options Paper (POP) in June 2017. The main purpose of the POP is to inform the next stage in the LDP process, i.e. the Plan Strategy.

5.2 Building on the emerging evidence base[1], the POP identified some 36 key strategic planning issues relevant to Mid and East Antrim, set out alternative options for addressing most of these key issues, and highlighted Council's Preferred Option. The POP also included an initial policy review of the operational policies contained in the suite of Planning Policy Statements (PPSs) published by the former Department of Environment (now DfI), also taking account of the Strategic Planning Policy Statement (SPPS).

5.3 The POP was subject to 12 weeks public consultation which resulted in 132 responses from members of the public and statutory consultees. A public consultation report on the POP was published by Council in November 2017.

5.4 The POP Spatial Growth Strategy broadly considers where growth should be directed in various sectors including retail and set out a Retail Strategy to ensure maximum benefits to the local economy in for Mid and East Antrim and to provide clarity on the retail role of the various centres.

5.5 The POP also proposed a Hierarchy of Centres (Key Issue 5) and identified two other Key Issues (9 and 10) and associated preferred and alternative options relating to retailing and town centres.

Retail Strategy

5.6 The majority of respondents in the POP consultation (71%) agreed with the proposed classification for our centres and their suggested roles. However 10% did not, suggesting alternative structures in the Hierarchy of Centres or alternative uses within, or definitions of the proposed tiers. A wide variety of views were received regarding the proposed District and Local Centres in the Hierarchy of Settlements, ranging from welcoming their inclusion, to seeking clarification of the selection process to suggesting that the Borough was not large enough to justify these additional tiers. Other comments supported a diverse range of uses in town centres and promotion of an evening economy.

5.7 Statutory consultees were supportive of the Retail Strategy. DfI welcomed the Council's declaration that protecting and enhancing the retail function in town centres is a key component of the proposed retail strategy

Key Issue 5 – Hierarchy of centres

5.8 Our preferred option was to align the Hierarchy of centres with the proposed Settlement Hierarchy and include local or district centres.

5.9 Our alternative options were (b) Align the Hierarchy of centres with the proposed Settlement Hierarchy (without local or district centres) and (C) Designate only Ballymena, Carrickfergus and Larne town centres (as designated or amended) as the main focus of retail development and have minimal intervention by the LDP below this level.

5.10 There was broad support (61%) for our preferred option with general agreement that the Hierarchy of Centres should align with the proposed Settlement Hierarchy and that provision is made for the inclusion of district and local centres. However some respondents were concerned that planned growth of small towns may dilute the main town centre offering. Several respondents endorsed the suggested district and local centres and some additional suggestions were made while two of the suggested centres were opposed.

[1] *A series of 14 topic based position papers informing the POP, plus our annual housing monitor and bi-annual industrial monitor are available on the Council website.*

5.11 Statutory consultees supported the Hierarchy of centres with NIHE supporting the designation of local centres as a means of protecting day-to-day needs of their neighbourhoods. DfI were concerned that proposed designation of district or local centres that are separated from the town centre by main roads could be seen to dilute the ethos and spirit of the town centre first approach in the SPPS. HED welcomed the linkage between the historic environment and the spatial growth strategy.

Key Issue 9 – Range of town centre uses

5.12 Our preferred option was to Define a Primary Retail Core (within some or all town centres) accompanied by policy to substantially protect and promote retail uses on ground floor frontages in these areas. Also to designate specific sites in the town centres for mixed use development (retail and other town centre uses).

5.13 Our Alternative options were (b) to set out strategic criteria applicable to all town centres in relation to the protection and enhancement of diversity of uses, (c) Define Primary Retail Cores in some or all town centres accompanied by policy to substantially protect and promote retail uses on ground floor frontages in these areas, (d) Designate specific sites in town centres for mixed use development and (e) have minimal plan intervention allowing flexibility by assessing planning applications on their merits.

5.14 There was strong public support (71%) for the preferred option but mixed views on which town centres should have a designated Primary Retail Core. There were also some opposing views on PRC's. This included opinion that PRCs would not promote active retail frontages, would not protect from non-retail uses and that PRCs could lead to high vacancy rates at ground floor level. By restricting other town centre uses, PRCs were seen by some as an impediment to strengthening the town centre economy, particularly the evening economy. There was a consensus that designating sites for mixed use development gives flexibility to deliver a range of uses that create healthy town centres and improved evening economy.

5.15 Statutory consultees supported this preferred option with DfI welcoming Council's commitment to ensure appropriate sites are designated to provide a diverse offer and mix of uses.

Key Issue 10 – Protecting and promoting other town centre uses

5.16 Our Preferred Option was to facilitate residential use through the protection of existing housing areas and/or include housing as part of the development mix in opportunity sites. Also to facilitate Class B1 Business Uses on upper floor levels in town centres.
Our Alternative options were (b) to only protect existing town centre housing, (c) to only facilitate Class B1 Business uses on upper floor levels in town centres, (d) Restrict residential and Class B1 Business uses to reduce competition for land/buildings for retail use and (e) have minimal Plan intervention, allowing flexibility by assessing applications on a case by case basis, taking account of the SPPS.

5.17 There was very strong support for the preferred option (86%) with most respondents welcoming promotion of housing units in mixed use development. Some respondents considered that new town centre development should include a residential element to compensate for loss of older housing stock. Facilitating Class B1 Business Uses on upper level floors was also strongly supported. Statutory consultees were supportive of the preferred option, welcoming the protection of town centre housing stock and encouraged the promotion of living over the shop (LOTS) as a means of increasing the supply of small housing units, revitalising centres, improving security and reducing the need for greenfield sites.

5.18 For Full details of the main issues raised by respondents to the POP consultation and Council's consideration, refer to the POP Public Consultation Report November 2017, available at:
https://www.midandeastantrim.gov.uk/downloads/POP_Public_Consultation_Report.pdf

6.0 Consultee and Councillor Engagement

6.1 In order to meet the requirements set out in the Planning Act relating to the need for the Plan Strategy to take account of the RDS , other policy and guidance issued by the Department and other relevant government strategies and plans; Council has engaged key consultees representing relevant central government departments and agencies. Representatives from relevant Council departments have also been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives. This engagement was undertaken by way of a series of eight 'Project Management Team' meetings held between April 2018 and April 2019 and has had a significant influence on the development of the strategic policies and proposals.

6.2 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Department for Infrastructure (DfI). Accordingly, Elected Members have also been engaged in the development of draft Plan Strategy, to ensure that the document is generally aligned with Council's strategic priorities. This engagement was facilitated through a series of six councillor workshops held between November 2018 and March 2019.

6.3 The draft Plan Strategy Hierarchy of Centres and supporting strategic subject policies were presented at the Councillor Workshop which was held on 28th November 2018 and the Project Management Team Meeting held on 16th January 2019. Councillors were generally in agreement with the Hierarchy however there was split opinion on whether Harryville should be designated as a local centre. The retail consultants could see merit in both keeping Harryville inside the TCB and removing it. Uncertainty around the categorisation of Harryville resulted in it not being included as a local centre at this stage. This option can be revisited when assessing the town centre boundary at LPP stage. In order to recognise the role of villages, small settlement and local centres in the Retail Hierarchy, policy RET 3 was developed and presented to Councillors and Consultees. There was general support for this policy which provides for new retail development in rural areas. Since none of the centres in Mid and East Antrim fell within the definition of a district centre, it was recommended by the retail consultants that this tier be omitted from the retail hierarchy.

6.4 Members were not in favour of designating Primary Retail Cores given the changing role of town centres and risk of increased vacancy if units restricted to retail use were not taken up. Retail Consultants agreed for the same reasons so this part of the option was not developed into policy in the draft Plan Strategy. However members fully agreed with Policy RET1 to promote established town centres as the first choice location for retailing and other town centre uses and to adopting a sequential approach to the identification of sites. To keep town centres economically competitive by minimising impacts of out of centre retailing, additional policy RET2 was developed to ensure that developments proposed outside of town centres and above a certain size would have to consider the retail impact on the town centre. Members were content with the broad thrust of a Retail Impact Assessment policy however opinion was divided on proposed thresholds for each town. Consultants therefore researched average unit sizes for each town and adjusted thresholds accordingly. Members were content with the proposed adjustments.

7.0 Draft Plan Strategy Policy Approach

Table 7.1 Amendments to the Pop Preferred Options for Key Issues 5, 9 and 10.

Key Issue	Relevant Strategic Subject Policy	Changes from POP Preferred Option
5	SGS7 – (Relating to Hierarchy of Centres)	The Retail Consultants reviewed the POP and proposed Retail Hierarchy (Key Issue 5 and table 5.9) and assessed each centre within the Borough in terms of population, number of units, market share, convenience and community services provision. Based on these findings a slightly amended Retail Hierarchy was developed to include Main towns Small towns, Local centres and Village centres (which includes small settlements). For retail purposes only, Portglenone was promoted to a small town centre given its strong retail offer. Greenisland was changed to a local centre, given its lack of retail offer and recognisable centre. Aside from Galgorm, other local centres proposed in the POP were discounted for reasons explained in the Retail Study. As none of the centres met the definition of a 'District Centre', this tier was also dropped from the retail hierarchy.
5	RET3 (Relating to Villages, Small Settlements and Local Centres)	Table 5.9 in POP classifies the role of each tier in the Hierarchy of Centres in Key Issue 5. This was amalgamated into Policy SGS7- Retail Hierarchy in the draft Plan Strategy as explained above. Policy RET3 was developed to clarify the type of retail development permitted within tier 3 Local Centres and tier 4 Village Centres (which includes small settlements).
9	RET1 (relating to Primary Retail Cores)	Following members' views and advice from the Retail Consultants, PRCs (POP Key Issue 9) were not proposed as part of the sequential approach to site selection for retail development in policy RET1.
9	RET1 (Relating to sites for mixed use development)	With regard to the support in the POP for mixed use development (Key Issue 9) a 'Call for Sites' consultation exercise will be undertaken at Local Policies Plan Stage to identify suitable mixed use development opportunity sites to meet the additional floorspace needs for Convenience and to a lesser extent Comparison Shopping identified in the Retail Study. The policy also provides for other town centre uses.
10	HOU2 and HOU4 (relating to promotion and protection of town centre housing	Following positive responses to POP Key Issue 10, Policy HOU2 – The Conversion or Change of Use of existing Buildings to Flats or Apartments encourages town centre living and Policy HOU4 – Protected Town Centre Housing Areas -protects established town centre housing stock.
10	ECD1 (relating to Class B1 Business Uses in the town centre)	Following positive responses to POP Key Issue 6, Policy ECD1 – Economic Development in Settlements, facilitates Class B1 Business Uses in town centres.

7.1 The fundamental policy approach adopted in the draft Plan Strategy, in line with the SPPS, is to secure a town centre first approach to retailing and other main town centre uses. This is given expression primarily through Policy RET1 which sets out a presumption to refuse applications outside town centres, unless certain exceptions can be met. The policy also sets out a sequential approach to site selection for retailing and other main town centre uses, so as to prioritise the defined town centre as the appropriate first choice location.

7.2 Policy RET 1 is complemented by Policy RET2, which ensures that retail proposals outside of the town centre give due consideration to any impact on the town centre. In this regard, the policy requires such proposals above a specified threshold size to be accompanied by a Retail Impact Assessment.

7.3 Other relevant issues relating to town centres were explained in the POP with a view to informing policy development. These are outlined in table 7.1.

7.4 The policy approach also addresses retail development in the smaller tier centres of the retail hierarchy as identified in strategic proposal SGS 7 Retail Hierarchy. This is given expression through Policy RET3 which allows for retail development in villages, small settlements and local centres where this is in keeping with the character of the settlement or centre and meets a local need to help sustain local communities.

7.5 The actual identification and classification of centres in the retail hierarchy was a matter that was explored in the POP. Accordingly the relevant issues are outlined in table 7.1

7.6 Finally, the draft Plan Strategy sets out the approach to retail development in the countryside through Policy RET4. In doing so the policy approach reflects that set out by regional planning policy, including the SPPS and the Planning Strategy for Rural Northern Ireland (PSRNI).

8.0 Soundness

8.1 The draft Plan Strategy has been prepared so as to take due regard to meeting the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to the strategic retail and town centre policies and proposals is regarded as sound because it meets the various tests of soundness as summarised below:

Table 8.1 Consideration of Soundness

Procedural Tests	
P2	The Retail Strategy, Retail Hierarchy and retail policies have evolved from the POP, POP consultation Report and Consultee and Councillor Engagement as described in sections 5.0 and 6.0 of this document
P3	The Retail Strategy, Retail Hierarchy and Retail Policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the RDS, particularly RG1 and RG7 and the spatial framework guidance as it applies to Mid and East Antrim. Refer to paragraphs 2.1-2.4 of this document
C2	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the Community Plan, particularly the Sustainable Jobs and Tourism theme to ensure our Borough is a place where there should be employment opportunities. Refer to paragraphs 2.17-2.19 of this document.
C3	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the SPPS, particularly paragraphs 6.267-6.292 relating to Town Centres and Retailing. Regard has also been given to PPS6: Built Heritage with respect to policies to protect historic buildings, archaeological features and remains and areas of importance to the historic environment such as Conservation Areas, all of which may fall within town centres. Supplementary planning guidance on place making has also been taken into account.
C4	The Retail Strategy, Retail Hierarchy and retail policies have had regard to the existing development plans within Mid and East Antrim, Council's Economic Development Strategy - Amplify and the emerging proposals of neighbouring councils. Refer to paragraphs 2.20 and 2.24 of this document.
Coherence and effectiveness tests	
CE1	The Retail Strategy, Retail Hierarchy and retail policies have taken account of the emerging LDP's of our three neighbouring councils and it is not considered to be in conflict with them. Refer to paragraph 2.24 of this document.
CE2	The Retail Strategy, Retail Hierarchy and retail policies are founded on a robust evidence base which includes • the baseline information assembled in Position Paper 4, • the POP and responses to it, • the Retail and Commercial Leisure Study by Nexus Planning • Town Centre Health checks by the LDP team • consultation with consultees including Councils Economic and Tourism department.
CE3	The Monitoring Framework (indicator 14) within Technical Supplement 1 outlines that the amount of net additional retail floorspace in main towns will be monitored and if more than 10% of retail floorspace approved in any one year is outside town centres a review will be triggered.
CE4	There will be flexibility for the Local Policies Plan to identify the extent of the main town centre boundaries as well as identification of development opportunity sites following a 'Call for sites' consultation exercise at LPP Stage. Key Site Requirements can be attached to the identified development opportunity sites, where necessary, to reflect current town centre needs. Retail/town centre policies and proposals will be reviewed at Plan Review Stage.

APPENDICES

Appendix A

PPS 1: General Principles	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Paragraph 3 - The public interest requires that all development is carried out in a way that would not cause demonstrable harm to interests of acknowledged importance.	Under the SPPS, the guiding principle for planning authorities in determining planning applications is that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance. The SPPS provides five core planning principles as well as strategic policy under 16 overarching subject matters. Across these principles and policies there are a number objectives such as good design and protecting amenity that apply to all development types.	It was recognised in the POP that there were a number of overlapping criteria across the various policies therefore it was suggested that these may be included within a General Policy in order to prevent duplication. It is recommended that consideration is given to bringing forward a General Policy in the LDP Plan Strategy.	No definitive comments received either for or against the inclusion of a General Policy. **Post consultation consideration** It is recommended that consideration is given to bringing forward a General Policy in the LDP Plan Strategy.	**Policy GP1: General Policy for all Development** New policy wording developed following the amalgamation of general policy criteria from across a number of existing policies such as PPS 3 AMP 1 and AMP 6, PPS 4 PED 9, PPS 7 QD1, PPS 16 TSM 7, PPS21 CTY 13, 14 &15, PPS 18 RE 2 as well as policies DES 2 and DES 10 in the PSRNI. The policy also takes account of planning principles included within PPS 12 and PPS 13. The proposed General Policy seeks to ensure that all development (except minor proposals) is sustainable, accords with the LDP and will not result in demonstrable harm to interests of acknowledge importance. This policy also provides operational policy for specific forms of development e.g. schools, which are not specifically catered for through other subject policies. The General policy sets out criteria under five headings that all development (except minor proposals) must meet, where relevant. Development within the countryside must also meet a number of additional criteria which are particularly relevant to the rural context. **Councillor & PMT Comments** Some of the original policy criteria have been amended to take account of comments raised through Councillor workshops and meetings with consultees. However, this engagement did not change the overall shape or thrust of the General Policy.

Retailing and Town Centres	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
New Policy RET1 Retail in town centres	6.271 of SPPS seeks to secure a town centre first approach for location of future retailing and other main town centres uses and adopt a sequential approach to site selection. 6.280 states a sequential test should be applied to applications outside an existing town centre and if sequentially preferable site exists in whole catchment, less sequentially preferable sites will be refused. 6.287 defines edge of centre as a default distance of 300m from town centre boundary.	The Town Centre first policy approach was not raised as a key issue in the POP. Issue relating to housing and offices uses in the town centres are addressed in the Housing and Economic development Technical Supplements.	There was majority support from members for this policy and it is also fully endorsed by consultees. Addressed by Retail consultants in Retail and Commercial Leisure Study. This report fully endorsed the 'town centre first' approach of the SPPS in the context of Mid and East Antrim.	**RET 1: Retail in town centres** This Policy has been developed with the primary aim of securing a town centres first approach for the location of future retailing and complementary town centre uses. The policy seeks to do this through setting out a sequential approach for retail and other main town centre proposals and outlines a presumption against applications outside these locations unless need can be demonstrated; alternative sites in the town centre are not suitable, viable or available; and no adverse impact on town centres in catchment area. **Councillor and PMT Comments** Following comments from NIHE that plan should promote mixed-use development, which can include residential development, this was addressed in Policy HOU 4 and following comment from HED text added to justification to clarify type of information required to aid determination.
New Policy RET2 Retail Impact Assessment	6.283 of SPPS advises that all applications for retail or town centre type developments above a threshold of 1000 sq metres gross external area, which are not in a town centre location or not in accordance with the LDP require an assessment of retail impact as well as need, although it advises that councils can adjust the thresholds to take into account local circumstances such as size, role and function of their town centres. 6.290 lists factors to be addressed in RIA, with 6.291 stating that where an impact on one or more of the list is significantly adverse or in balancing impacts overall, the proposal is judged to be harmful, then it must be refused.	Not Discussed at POP stage Addressed by Retail consultants in Retail and Commercial Leisure Study	Members were content with the intent or broad thrust of a RIA policy and agreed it was necessary to at least protect town centre retail role. However opinion was divided on consultants proposed thresholds for each town. Planning considered this element was not adequately addressed by consultants and requested more detailed evidence to support various thresholds. Consultants provided average unit sizes for each town and adjusted threshold holds accordingly	**RET 2: Retail Impact Assessment** Policy was developed based on sound evidence base **Councillor and PMT comment** Following comment from DM in relation to permitting small scale convenience shops outside town centres, a floorspace limit was added to clarify that there is not the scope to submit proposals up to just under the RIA thresholds. Members were content with adjusted thresholds following sight of average floorspace sizes.
New Policy RET3 Retailing in villages, Small Settlements and Local Centres	6.278 of SPPS states policies and proposals for local shops in villages and small settlements must be consistent with the aim, objectives and policy approach for town centres and retailing, meet local need and be of a scale, nature and design appropriate to	Retailing in villages, small settlements and local centres was not raised as a key issue in the POP. Public comments however included: 'Villages should not have designated village centres. The village itself	There was general support for this policy which provides for new retail development in rural areas. Retail Consultants provided a description of the uses that would be acceptable in each tier of the hierarchy.	**RET 3: Retailing in villages, Small Settlements and Local Centres** This policy was developed to reflect the SPPS position and evidence provided by consultants **Councillor and PMT comment** No comment/objections to this policy

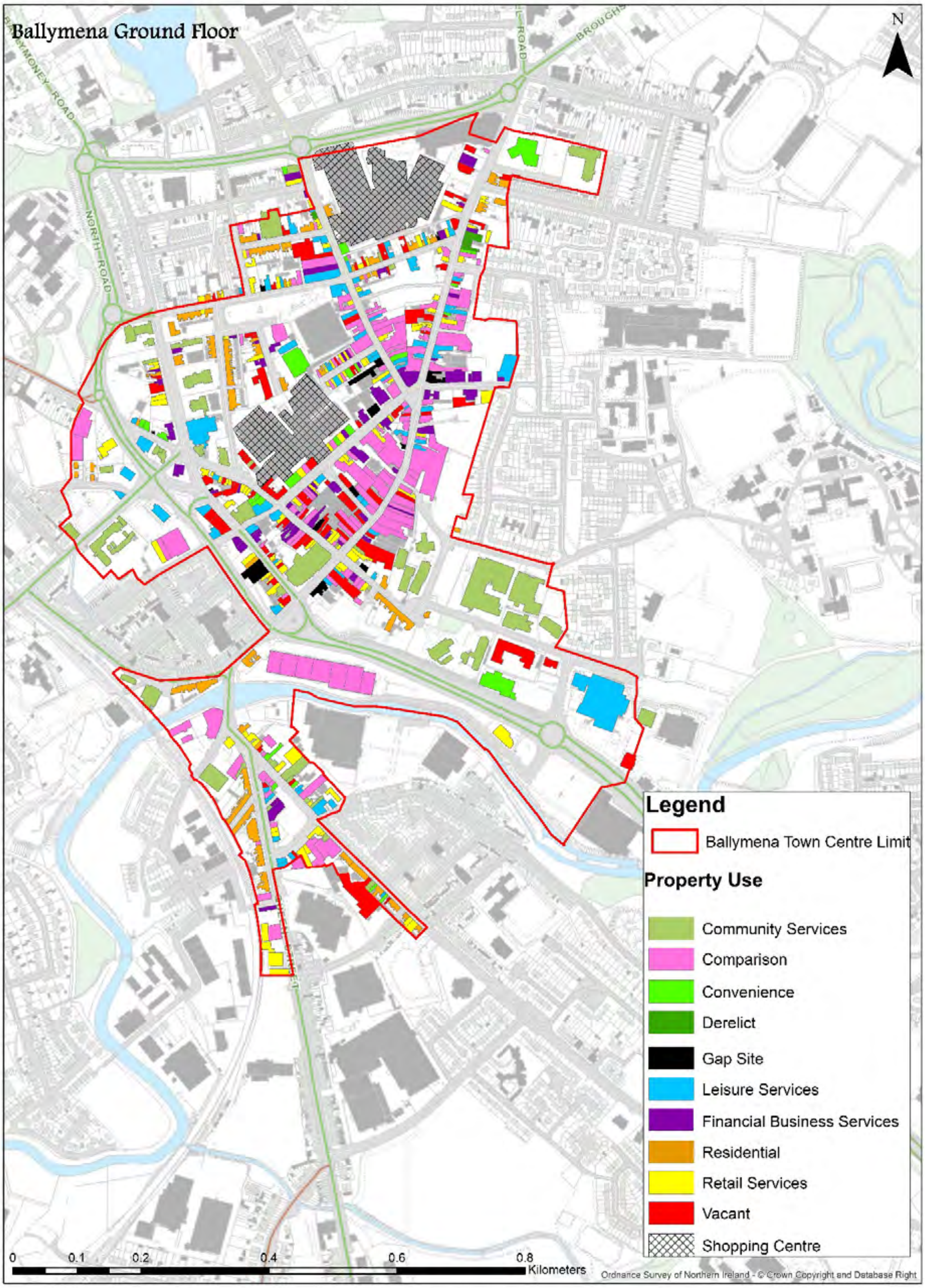
	character of settlement	constitutes the centre within its rural area' and 'it is important that the plan should contain suitable flexibility for local shopping facilities beyond designated centres e.g. where levels of provision are inadequate.'		
New Policy RET4 Rural Shops and Roadside Service Facilities **Policy IC 15: Roadside Service Facilities** States that the provision of roadside service facilities on the trunk roads network in the open countryside may be considered acceptable where there is a clear indication of need and subject to any retailing being ancillary to the main petrol filling station use. It states that a driver is expected to travel 12 miles along a main traffic route before reaching a petrol filling station, therefore proposals for new facilities within 12 miles of existing services will not normally be acceptable	6.279 of SPPS states that inappropriate retail facilities in the countryside will be resisted but lists exceptions: farm shops, craft shops and shops serving tourist or recreational facilities, to be located within existing buildings SPPS is silent on Roadside Service Facilities. However, it is not listed as one of the specified exceptions to the general presumption against retail development in the countryside (para 6.279)	Rural Shops and Roadside Service Facilities were not addressed at POP stage Public comment included 'there should be appropriate flexibility for modern petrol forecourt and local shopping facilities on main roads across the Borough Council and 'Provision should be made for local shopping facilities and petrol forecourt facilities which often will not be in designated centres.' It is recommended that the thrust of Policy IC 15 will be included within new Policy on Retailing to be included in the LDP Plan Strategy, subject to confirmation of the status of the policy from DfI.	This Policy was not developed until after the councillor and PMT workshops following comment from Development Management re need to address roadside Service facilities despite SPPS silence on it. It was decided to combine rural shops with roadside service facilities to wholly address retail in the open countryside.	**RET 4: Rural Shops and Roadside Service Facilities** The first part of this policy reiterates content of SPPS para 6.279 and clarifies that it applies to proposals outside of settlement limits. The second part carries forward wording form Policy IC15 Of PSRNI and adds the direction of the SPPS that there can be no unacceptable adverse impact upon the viability and vitality of existing centres in the catchment area. It clarifies that office uses will not be permitted and that all proposals must meet general policy and accord with other provisions of the LDP

Industry and Commerce (PSRNI)	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Policy IC 15: Roadside Service Facilities States that the provision of roadside service facilities on the trunk roads network in the open countryside may be considered acceptable where there is a clear indication of need and subject to any retailing being ancillary to the main petrol filling station use.		Public respondents suggested flexibility for local shopping facilities and petrol forecourts outside of development limits.	**Post consultation consideration** Further discuss with DfI before bringing forward POP recommendation.	This policy was developed to reflect the SPPS direction in regard to retail development in the countryside and also to carry forward the thrust of IC15 of PSRNI in regard to roadside service facilities.
Policy IC 16: Office Development (Use Class A2) Sets out policy to facilitate office development in established town centres. This policy applies to office uses falling within Use Class A2 (of the Planning (Use Classes) Order (Northern Ireland) 2015) which provide financial professional and other services which are appropriate in a shopping areas where the services are principally to visiting members of the public. Its aim is to facilitate office development in established town centres in order to retain the vitality and viability of existing urban centres, and resist out of centre office development nodes.	SPPS seeks to ensure a town centre first approach for the location of retailing and other main town centre uses. The latter includes business which in turn include A2 office development	It is recommended that the remaining wording of Policy IC 16 in relation to Class A2 Uses (Financial, professional and other services) will be included within new Policy on Town Centres and Retailing to be included in the LDP Plan Strategy.	No comments received from statutory consultees or public respondents to this policy. **Post consultation consideration** Bring forward POP recommendation.	This policy is incorporated into policy RET1 which includes businesses (hence offices) as other main town centre uses. Paragraph 7.2.8 of the draft Plan Strategy also clarifies that offices falling within use class A2 are appropriate town centre uses.
Policy PED 1: Economic Development in Settlements Outlines the types of B Class Business uses which are allowed for economic development within cities, towns, villages and smaller rural settlements. This policy seeks to concentrate employment and services associated with this type of	SPPS paragraph 6.85 recognises that Class B1 Business Uses should be permitted within town centres (and district and local centres identified by the LDP),	Key Issue 6 considers the location of Class B1 Business Use. The preferred option allows for Class B1 Business Uses within town centres, district or local centres as well as economic development land (or identified parts thereof) as part of a sequential approach. It is recommended that the updated wording of Policy PED 1 is brought forward in the LDP Plan Strategy.	Broad support for the Council's approach to Policy PED 1. Invest NI was supportive of Key Issue 6 preferred option. Numerous respondents endorsed the sequential approach to ensure that town centres are always considered as the first option, as this will drive footfall and also provides the necessary flexibility for	This policy is accounted for within Retail **Policy RET1 –Retailing and town centres**, in that 'businesses' are considered a main town centre use. The J&A (para 7.2.8) expands to clarify that Class B1 business uses are appropriate in the town centre, also signposting to Policy ECD1 –Economic Development in Settlements which facilitates Class B1 Business uses in town centres.

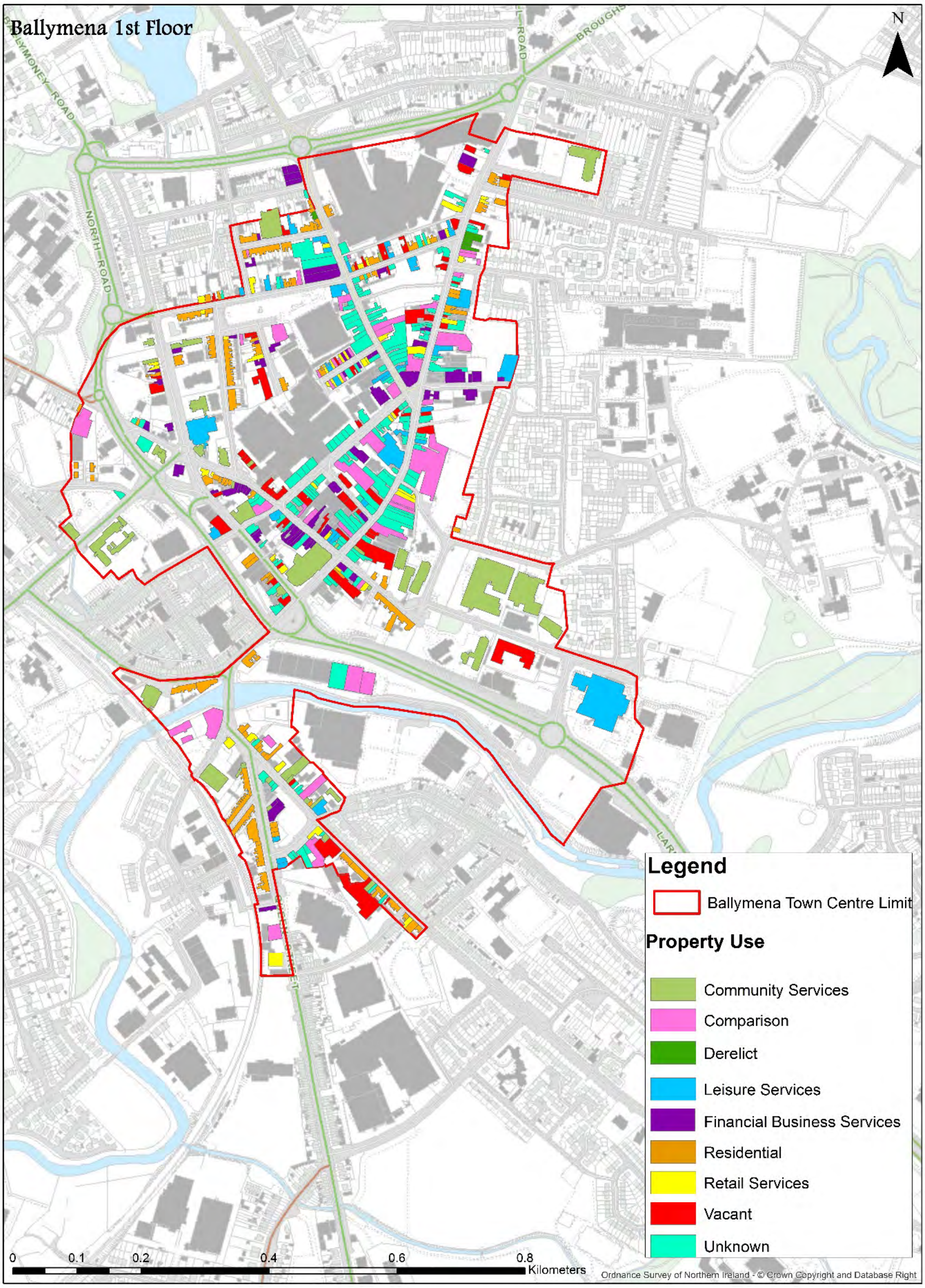
development within the main hubs, and for B1 uses more specifically within town centres. PED1 superseded Office Development Policy IC 17: 'Small Office and Business Development' from 'A Planning Strategy for Rural Northern Ireland' insofar as it applied to Class B1 of the 2004 Use Classes Order:			Class B1 investors. Translink raised concerns regarding including economic zonings in the sequential approach due to accessibility. DfI Planning also requested clarification on rationale for including economic zonings. **Post consultation consideration** Discuss further with DfI Planning before bringing forward POP recommendation.	

Appendix B

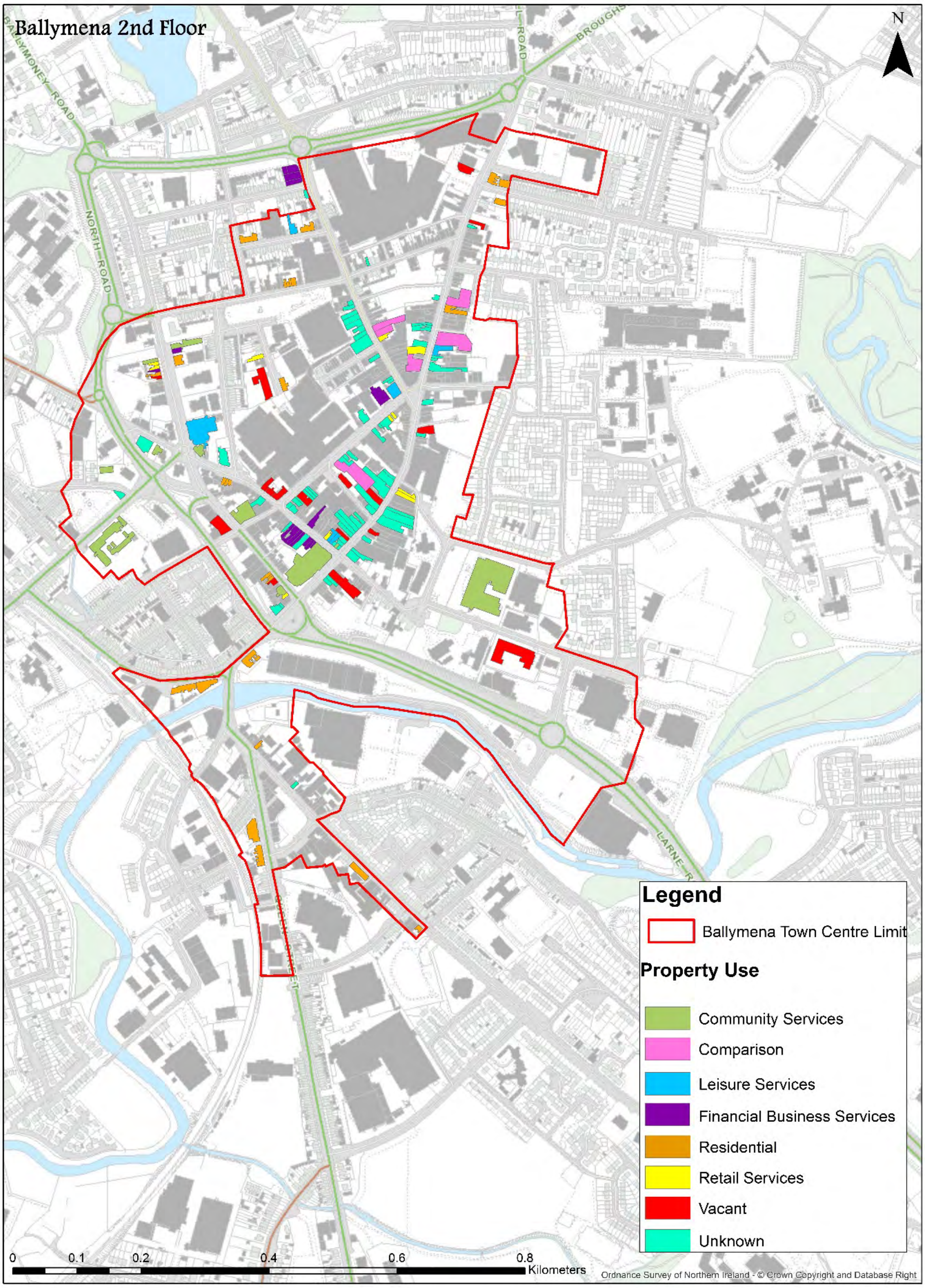
Map 1.1 Ballymena Town Centre Land Use (March 2018) – Ground Floor



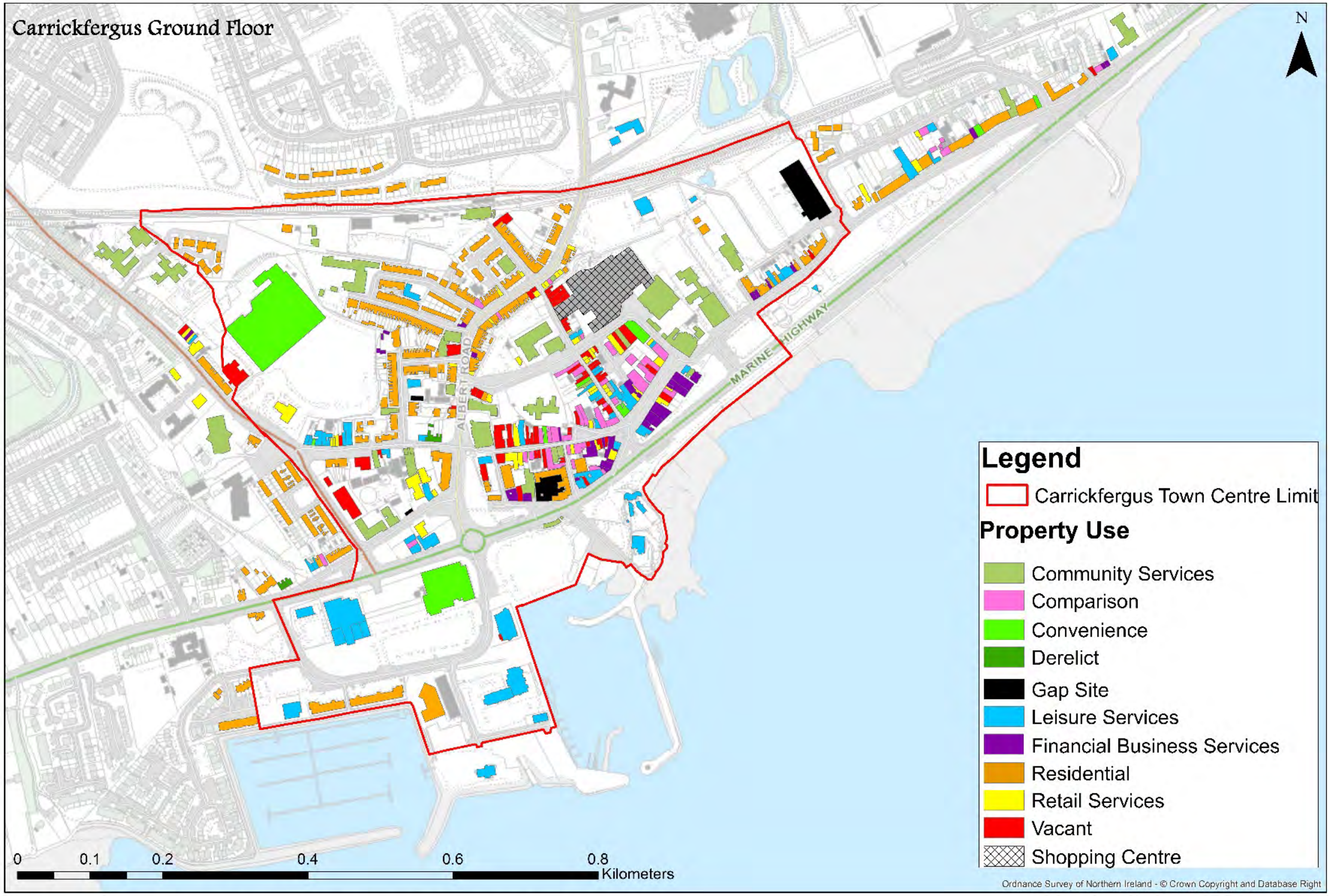
Map 1.2 Ballymena Town Centre Land Use (March 2018) – First Floor



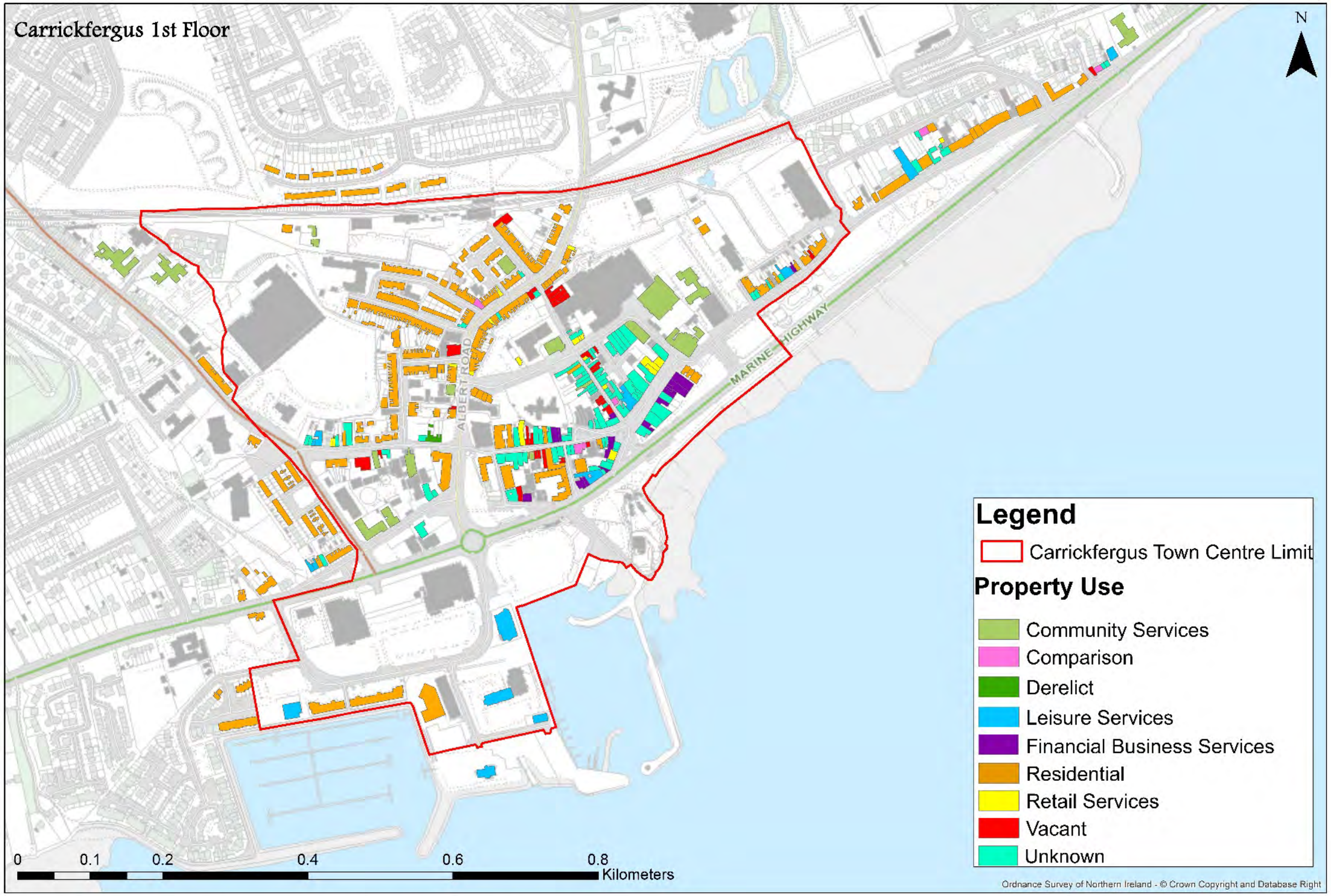
Map 1.3 Ballymena Town Centre Land Use (March 2018) – Second Floor



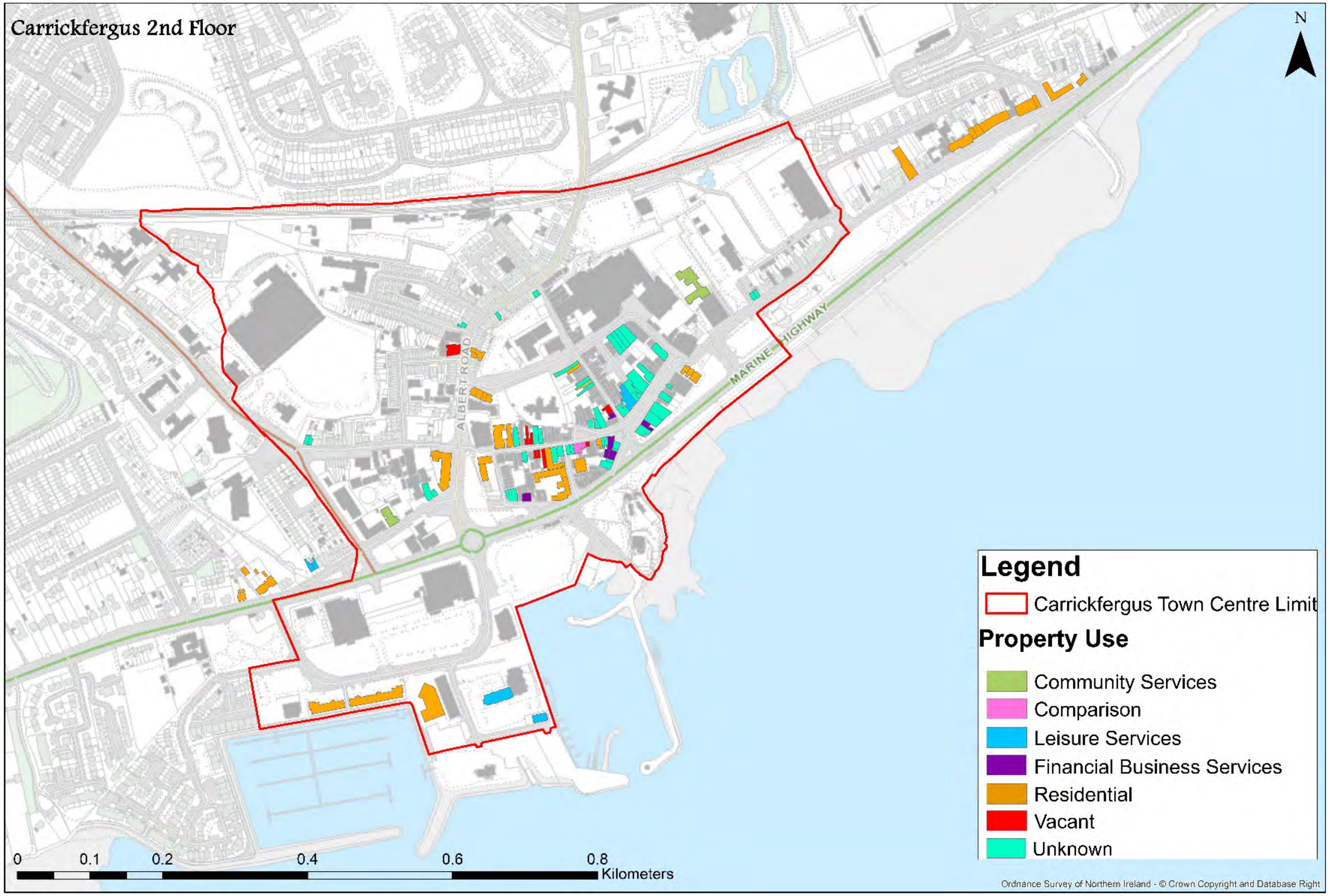
Map 2.1 Carrickfergus Town Centre Land Use (March 2018) – Ground Floor



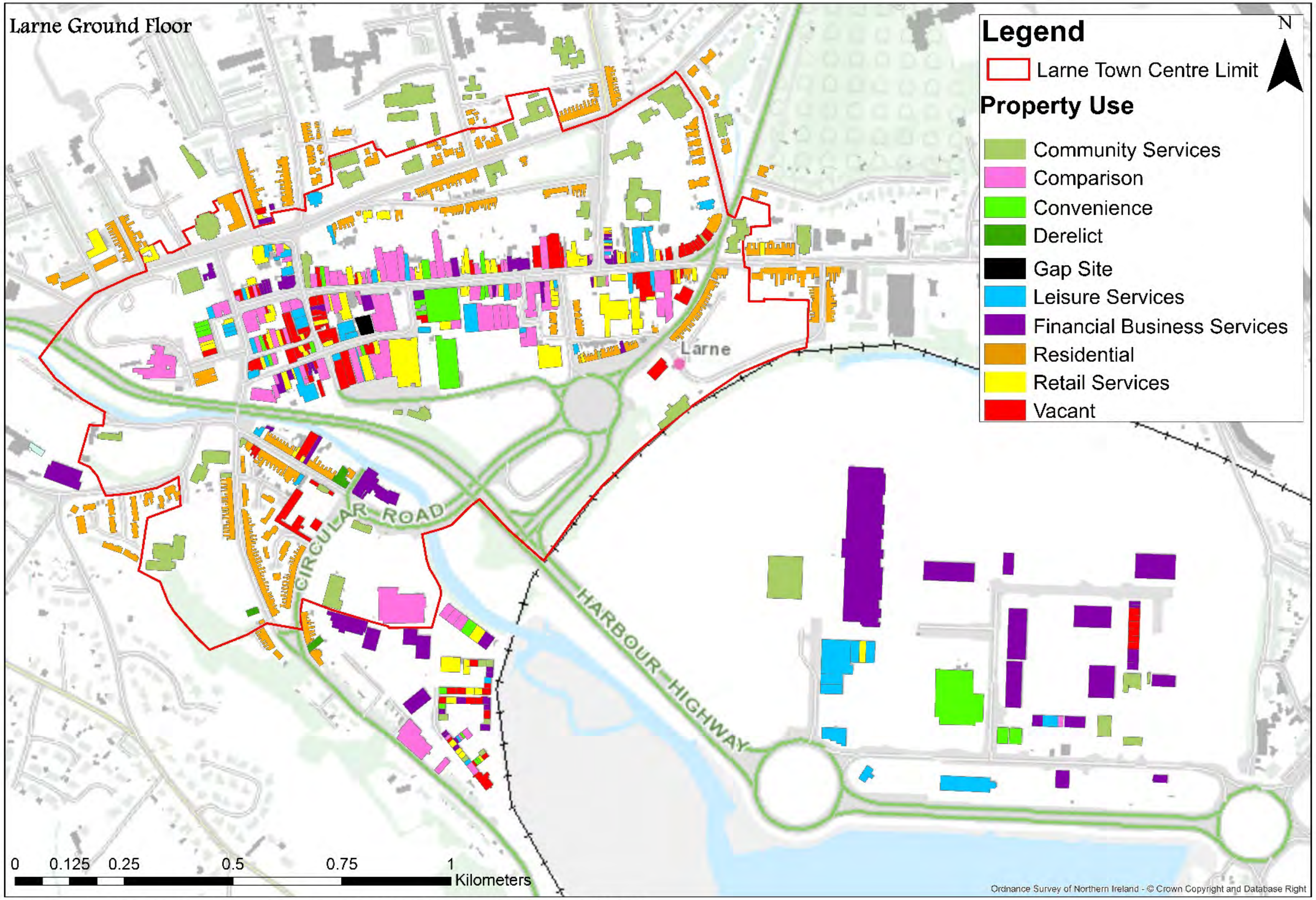
Map 2.2 Carrickfergus Town Centre Land Use (March 2018) – First Floor



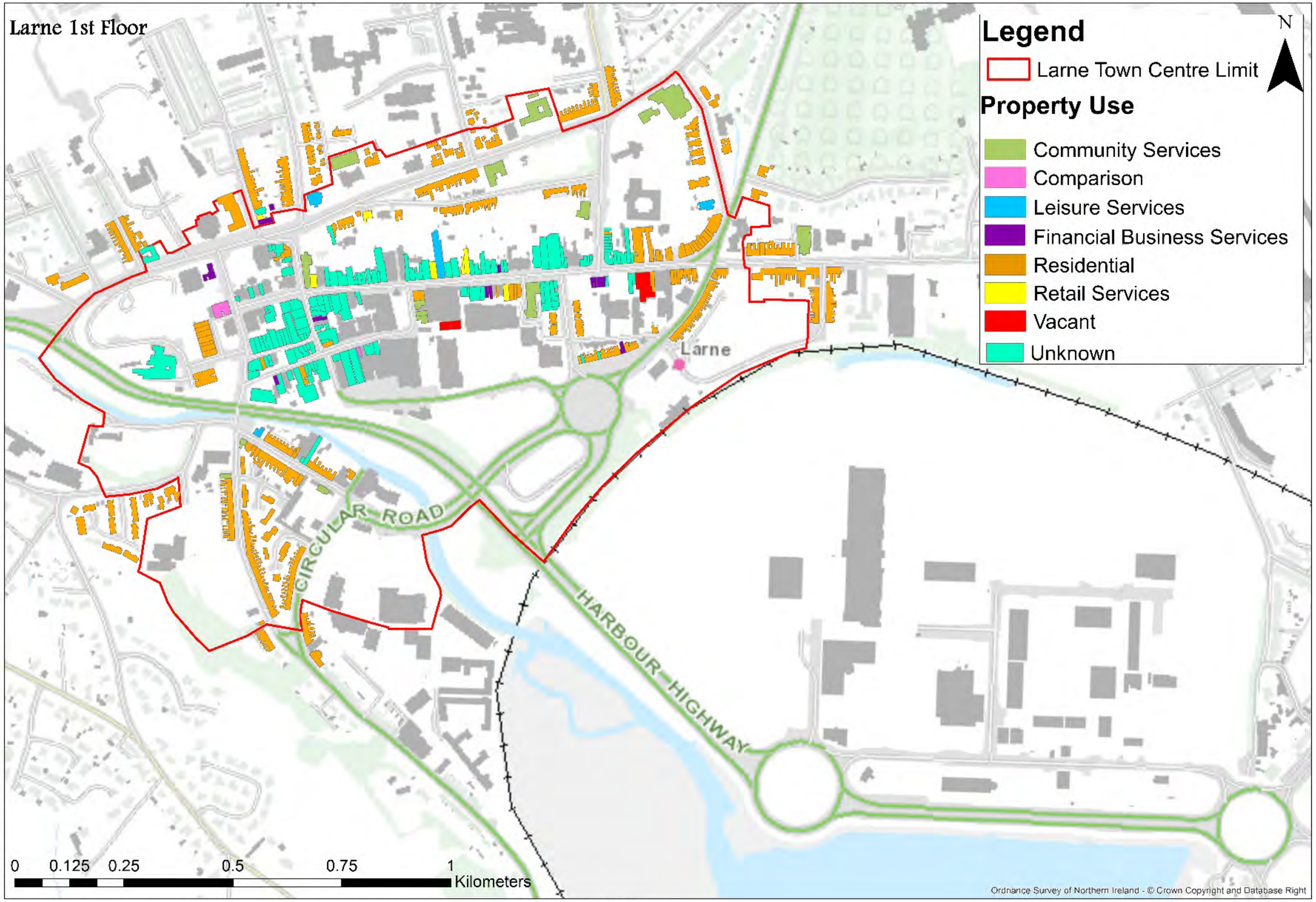
Map 2.3 Carrickfergus Town Centre Land Use (March 2018) – Second Floor



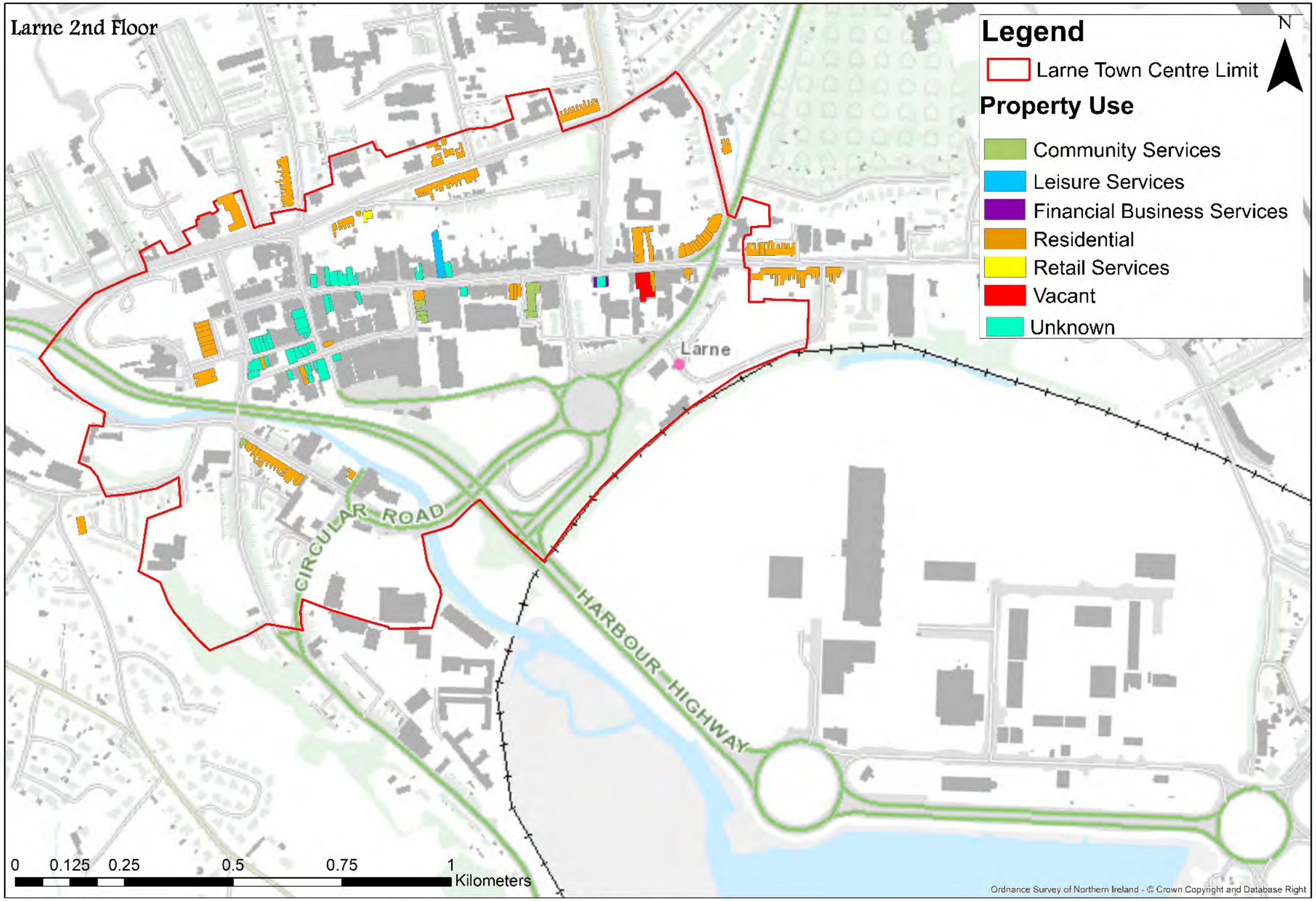
Map 3.1 Larne Town Centre Land Use (March 2018) – Ground Floor



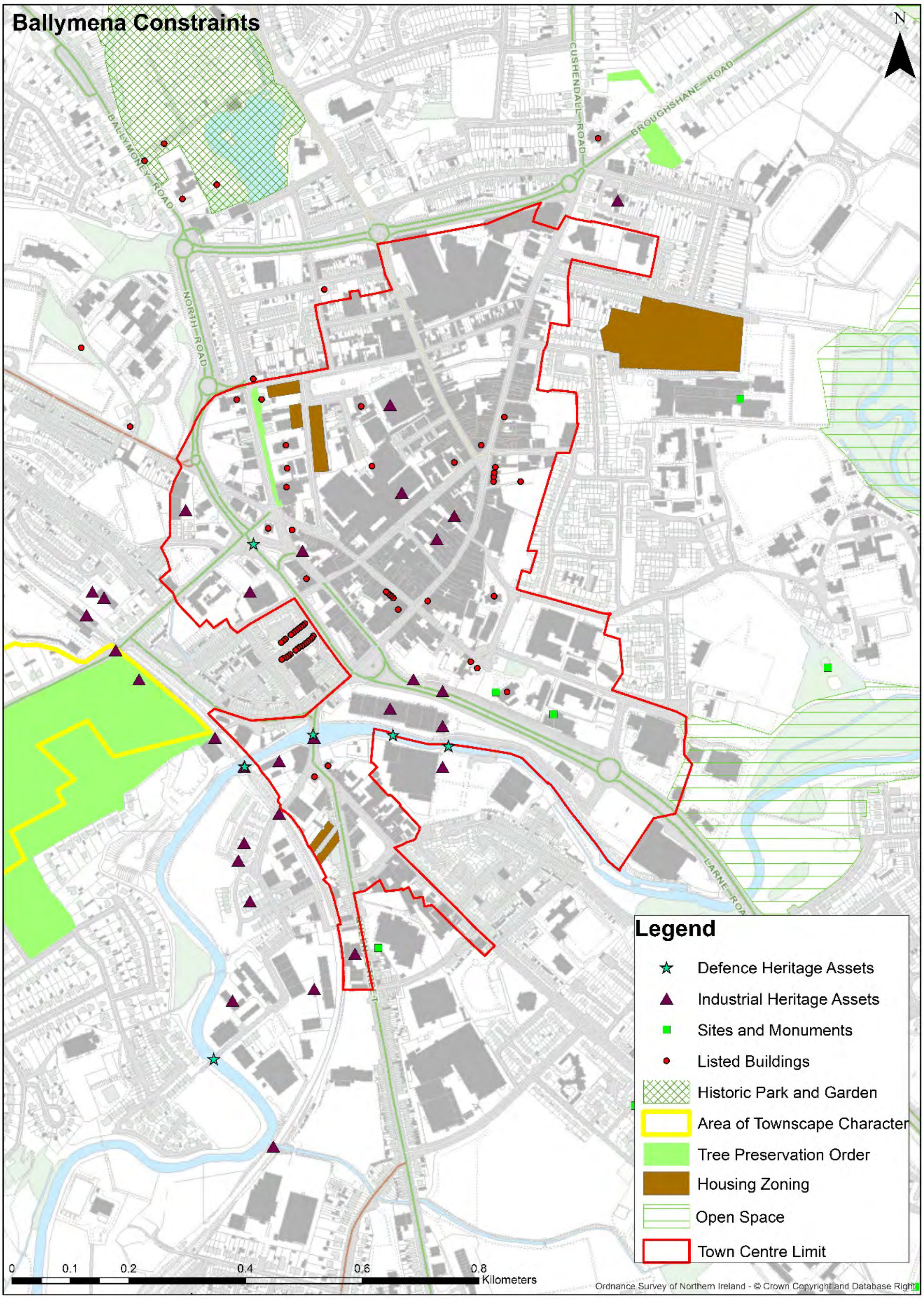
Map 3.2 Larne Town Centre Land Use (March 2018) – First Floor



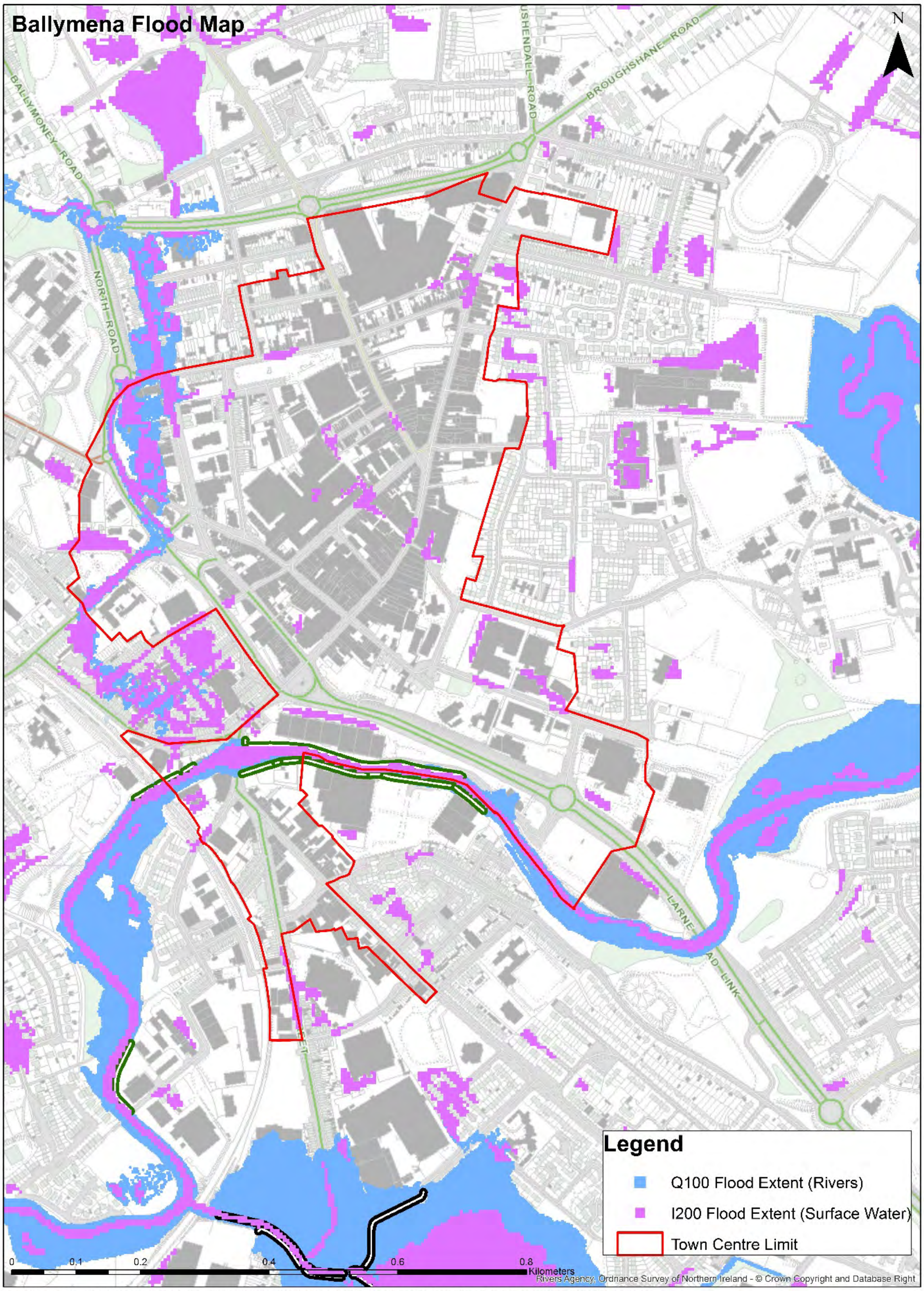
Map 3.3 Larne Town Centre Land Use (March 2018) – Second Floor



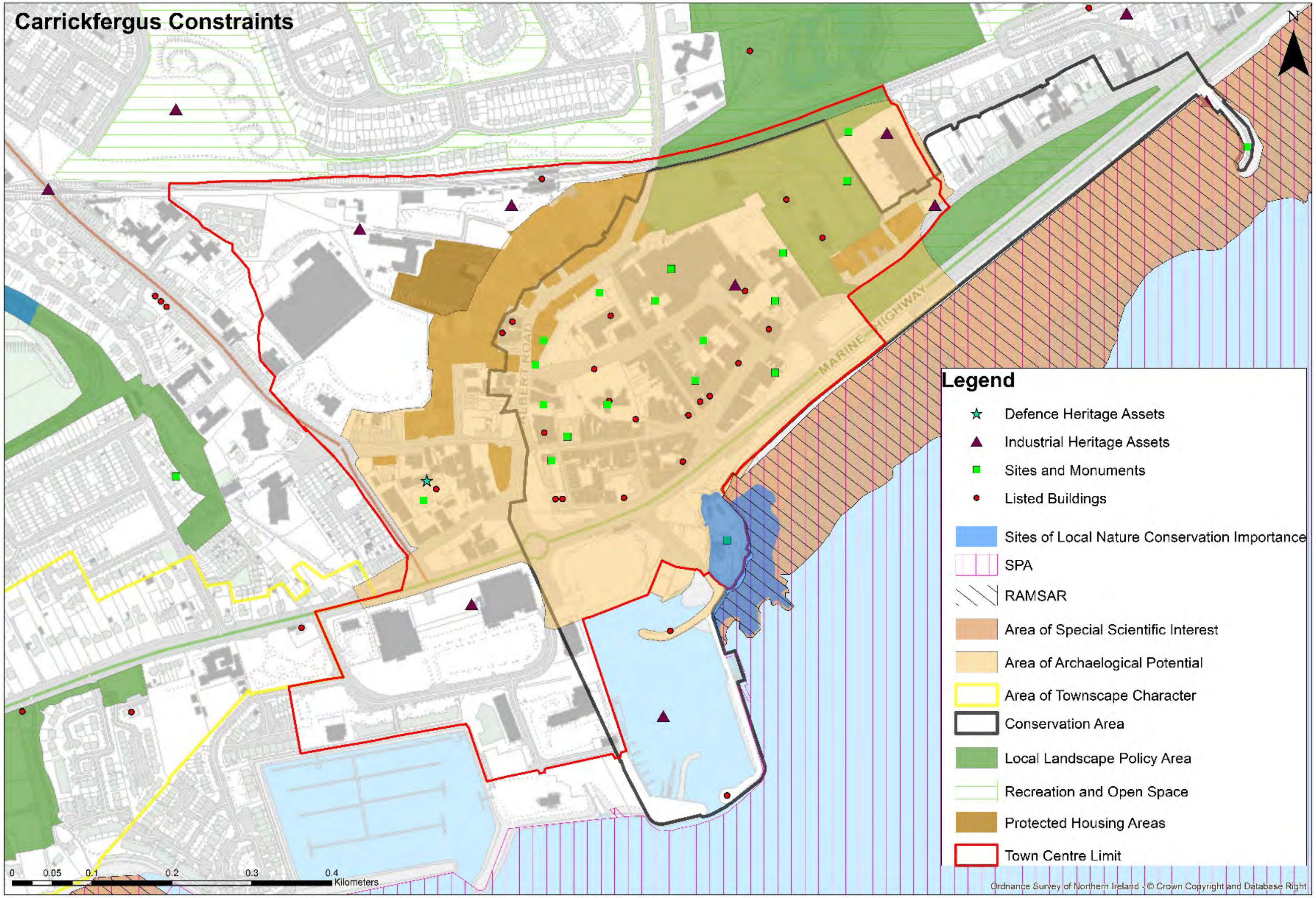
Map 4.1 Ballymena Physical Structures and Constraints (March 2018)



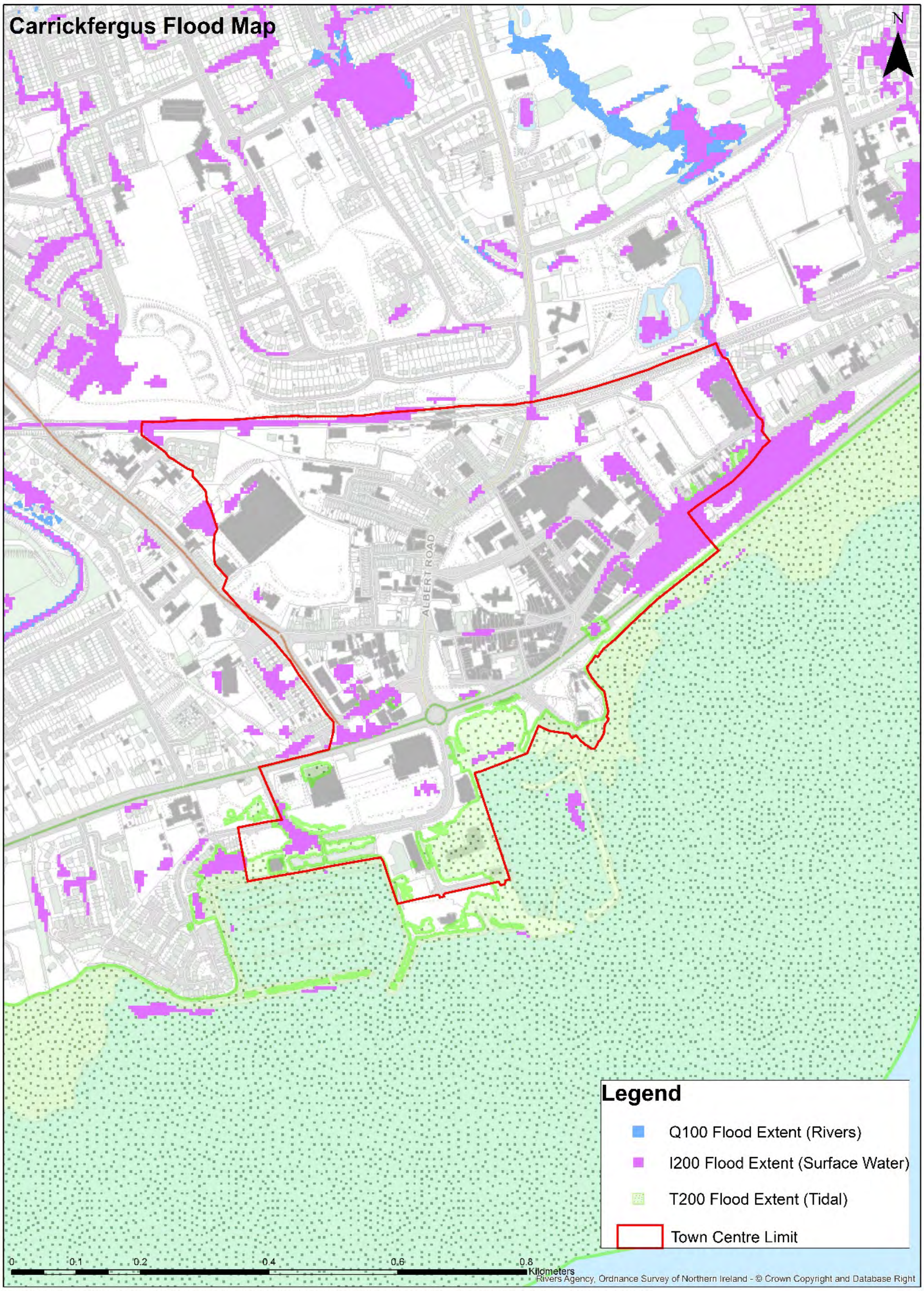
Map 4.2 Ballymena Flood Map (March 2018)



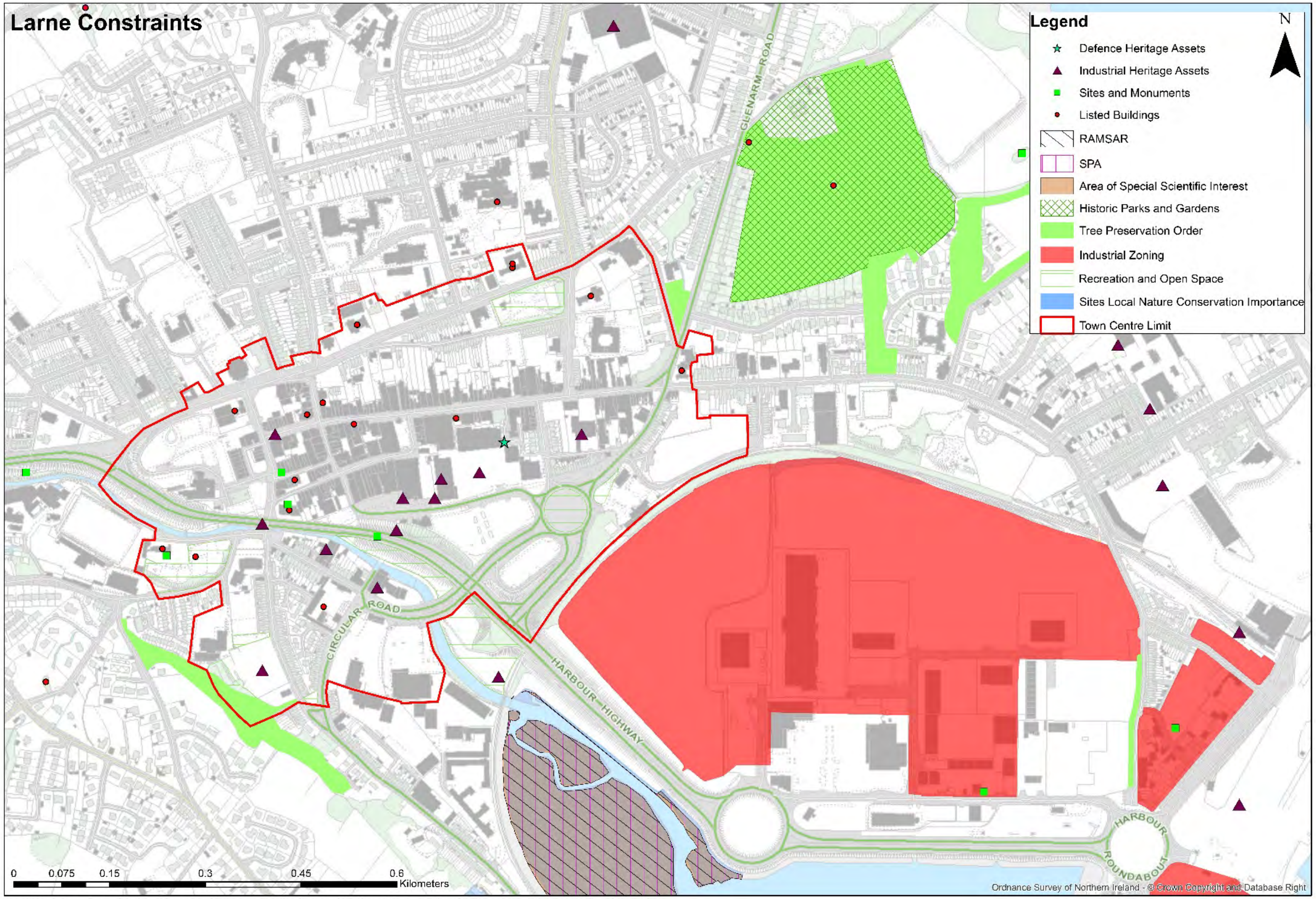
Map 4.3 Carrickfergus Physical Structures and Constraints (March 2018)



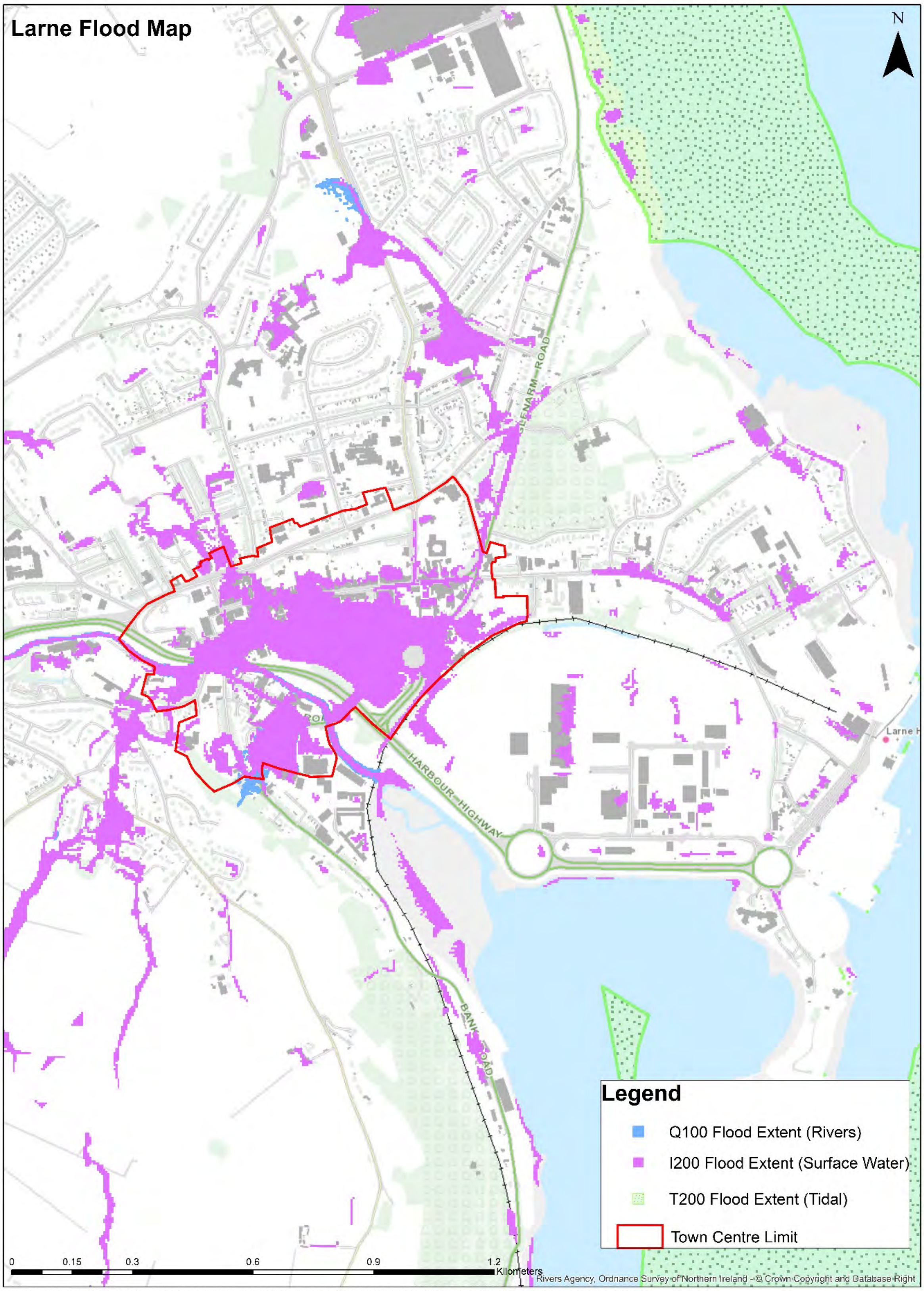
Map 4.4 Carrickfergus Flood Map (March 2018)



Map 4.5 Larne Physical Structures and Constraints (March 2018)



Map 4.6 Larne Flood Map (March 2018)



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