

Local Development Plan 2032
Technical Supplement Paper 6

Town Centres and Retailing



**Ards and
North Down**
Borough Council

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1.0 INTRODUCTION

Purpose of this Document

- 1.1 This technical supplement is one of a suite of topic-based documents detailing the evidence base used to inform the preparation of the Ards and North Down Local Development Plan (LDP) draft Plan Strategy 2032. This suite of documents should be read alongside the policies contained within the draft Plan Strategy in order to understand the rationale and justification for each policy.
- 1.2 In May 2019, the Council launched the Preferred Options Paper (POP), the first of 3 public consultation documents which will be issued through the LDP process. The POP outlined the vision and strategic objectives of the plan based upon the baseline information detailed in a suite of position papers. The technical supplements which complement the draft Plan Strategy will build upon the baseline information gathered in the position papers and show how this has been progressed through the LDP process to formulate the draft Plan Strategy.
- 1.3 This technical supplement builds upon and updates the Town Centres and Retailing Preferred Options Paper position paper, and along with the full suite of technical supplements, topic papers and associated documents sets out the evidence base that has formulated the town centres and retailing policies in the draft Plan Strategy.
- 1.4 Public consultation processes and engagement with elected members have also been taken into account. It should be noted that this is based upon the best information available at the time of compiling this position paper. Amendments may be required as new data becomes available or as a result of any changes in policy or guidance.

Planning, Town Centres and Retailing

- 1.5 Town centres operate not only as the commercial heart of a town but also as the focus for service, entertainment, leisure, cultural and civic activities. These other main town centre uses are playing an increasingly important complementary role to traditional retail uses as they enable activity levels to be sustained at different times of the day and throughout the week. Increasingly the most successful urban centres are vibrant, diverse and alive with activity.
- 1.6 The retail sector in Ards and North Down has followed a decline as evidenced in Northern Ireland and the UK as a whole. Challenges to town centre

retailing such as the rising popularity of online shopping and the growth of out-of-town shopping centres have been further compounded by the economic impact of the Coronavirus 19 pandemic.

- 1.7 Shopping and visits to town centres are increasingly becoming a leisure activity. This suggests that town centres need to offer an experience above and beyond the average shopping trip that might otherwise be carried out elsewhere or online. This requires town centres which are vibrant and diverse in their offering to make them attractive to a diverse group of people of all ages. These uses are complementary in nature and increase the likelihood of linked trips and increased trade for footfall dependent businesses.
- 1.8 In the current uncertain retailing climate, planning policy can play an important role in helping to future-proof city, town and village centres by enabling a range of complimentary functions to locate here.

2.0 REGIONAL POLICY CONTEXT

[Programme for Government 2024-2027](#)

- 2.1 The Northern Ireland Executive has agreed and consulted upon 'Our Plan: Doing What Matters Most', the Programme for Government (PfG) 2024-2027. The PfG sets out the Executive's priorities for making a difference to people's lives – comprising nine immediate priorities and three long-term missions of people, planet and prosperity, with a cross-cutting commitment to peace.

[Draft Programme for Government 2016-2021](#)

- 2.2 The previous draft Programme for Government 2016-2021 was the most up to date expression of the highest level of policy from the Northern Ireland Executive during much of the preparation of the draft Plan Strategy.

[Regional Development Strategy 2035](#)

- 2.3 The Regional Development Strategy (RDS) provides an overarching strategic planning framework to facilitate and guide the public and private sectors. It is not limited to land use but recognises that policies for physical development have far reaching implications. The RDS addresses economic, social and environmental issues aimed at achieving sustainable development and social cohesion. The Local Development Plan must take account of the RDS.
- 2.4 The vision of the RDS is for "An outward-looking, dynamic and liveable Region with a strong sense of its place in the wider world; a Region of opportunity where people enjoy living and working in a healthy environment

which enhances the quality of their lives and where diversity is a source of strength rather than division.”

- 2.5 Regional Guideline 1 (RG1) seeks to ensure an adequate supply of land to facilitate sustainable economic growth. Whilst this guideline focuses on employment lands, it states that the focus will be on larger urban centres and regional gateways taking advantage of their locations on the regional transport network.
- 2.6 Regional Guideline 7 (RG7) supports urban and rural renaissance, stating that regeneration is necessary to create more accessible, vibrant city and town centres which offer people more local choice for shopping, social activity and recreation.
- 2.7 The RDS recognises Bangor as a commuter town with an important retail and commercial centre.
- 2.8 Spatial Framework Guidance 1 (SFG1) seeks to promote the regeneration of the town centres of Bangor and recognises its significant housing catchment area. SFG1 states the importance of extending the employment and retail base to serve the catchment. Bangor is acknowledged as having a complementary role to play within the Belfast Metropolitan Urban Area (BMUA). The framework gives guidance that mixed use development should be guided towards sites which will enhance local regeneration initiatives. It is hoped that the future development of Queens Parade in Bangor will be a catalyst for further regeneration of the City Centre. SFG1 also highlights the role of Newtownards as a key commuter town to Belfast with a long-established reputation as a prime retail destination, with a vibrant mix of high street and independent shops.

[Strategic Planning Policy Statement](#)

- 2.9 The Strategic Planning Policy Statement (SPPS) was published by the Department of the Environment (DOE) in September 2015. 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 of retailing and other complementary functions, consistent with the RDS.’
- 2.10 The SPPS sets out that LDPs should define a network and hierarchy of centres, define the spatial extent of town centres and primary retail cores and set out appropriate policies that make clear which uses will be permitted in the hierarchy of centres and other locations, and the factors that will be taken into account for decision taking. The LDP should also provide for a diverse offer and mix of uses, which reflect local circumstance and allocate a range of suitable sites to meet the scale and form of retail, and other town centre uses.

Retailing in rural areas is tightly controlled by a limited range of circumstances within which it may be found acceptable, for example for farm shops and shops serving tourist amenities.

3.0 PLANNING POLICY STATEMENTS AND SUPPLEMENTARY GUIDANCE

- 3.1 Planning Policy Statement 5: Retailing and Town Centres has now been withdrawn and replaced by the SPPS.

[Guidance Documents](#)

- 3.2 Living Places: An Urban Stewardship and Design Guide for Northern Ireland (DfI 2014) provides strategic guidance to improve the planning, design and management of urban places with the aim of achieving stronger cities, towns, villages and neighbourhoods.

4.0 LOCAL POLICY CONTEXT

[The Big Plan for Ards and North Down 2017-2032](#)

- 4.1 The Big Plan is the Community Plan, providing an overarching framework setting out a shared vision and ambition that Ards and North Down's Strategic Community Planning Partnership has agreed to work towards over the next 15 years. The vision of the plan is that Ards and North Down is a vibrant, connected, healthy, safe, and prosperous place to be.
- 4.2 The overarching, cross-cutting ambition of The Big Plan is 'To have empowered, resilient individuals and communities, to reduce inequality; to promote good relations and sustainability; and to improve the accessibility of all public services.'
- 4.3 The Big Plan contains five outcomes that the Plan hopes will reflect the position of the borough by 2032. The following outcomes of 'The Big Plan' link to town centres and retailing within the Borough:
- Outcome 1 - All people in Ards and North Down benefit from opportunities to fulfil their lifelong potential.
 - Outcome 3 - All people in Ards and North Down benefit from communities where they are respected, are safe and feel secure.

- Outcome 4 - All people in Ards and North Down benefit from a prosperous and inclusive economy.
- Outcome 5 - All people in Ards and North Down benefit from an environment that is valued, well-managed and accessible.

4.4 Part 2 of the 'Big Plan' was published in April 2022 as a scheduled 4 yearly review. This review highlighted that many of the priorities previously identified such as poverty and mental health were highlighted as the most pressing issues during the previous 4 years exacerbated by the Covid-19 pandemic.

4.5 The Local Government Act 2014 through an amendment to Section 8 of the Planning Act (Northern Ireland) 2011 introduced a statutory requirement that the preparation of the LDP must take account of the Community Plan. The Big Plan will work in tandem with the LDP providing the spatial framework to achieve the shared vision for the Borough.

[Ards and North Down Corporate Plan 2024- 2028: A Sustainable Borough](#)

4.6 The priorities of the corporate plan are closely aligned to those within 'The Big Plan', the community plan for Ards and North Down, which sets out a long-term vision for Council, local organisations and communities to work towards. The Corporate Plan aims to see progress towards a sustainable Borough through innovation in services and greater partnerships with residents and other organisations. The plan is driven by three corporate priorities: Economic- increasing growth by attracting more jobs and businesses, Environmental- reducing carbon emissions as we transition to net zero and, Social- improving wellbeing through social inclusion and reducing inequalities.

4.7 These corporate priorities are linked to seven outcomes the Council wants to achieve. Of particular relevance to the topic of transportation are Outcome 2: An environmentally sustainable and resilient Council and Borough meeting our net zero targets, Outcome 3: A thriving and sustainable economy and Outcome 4: A vibrant, attractive, sustainable Borough for our citizens, visitors, businesses and investors.

[The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 \(Ards and North Down Borough Council\)](#)

4.8 The Integrated Strategy takes a lead from the Borough's Community Plan and identifies six thematic priorities. The thematic priorities of most relevance to town centres and retailing are; promote to attract investment; equip with skills and spaces; excel in quality and value; and nurture our assets. These thematic priorities provide a framework within which specific actions are identified as being of strategic importance to the Borough.

5.0 EXTANT AREA PLANS

- 5.1 It should be noted that BMAP was adopted in September 2014 but was subsequently quashed as a result of a judgment in the Court of Appeal delivered on 18 May 2017. 12 As a consequence of this, the North Down and Ards Area Plan 1984-1995, the Belfast Urban Area Plan, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area with draft BMAP remaining a material consideration. The Ards and Down Area Plan 2015 covers the remainder of the Borough which was previously Ards Borough Council. These plans remain extant until replaced by the new Local Development Plan (LDP) for the Borough. These existing plans are an important consideration in the LDP process, as they provide a starting point for the review of our spatial planning options.

Draft Belfast Metropolitan Area Plan 2015 (dBMAP)

- 5.2 Volume 7 of draft BMAP sets out policies for (former) North Down District. Draft BMAP 2015 sets out a retail hierarchy for the North Down area including Primary Retail Cores/Frontage, Town Centres, and District Centres. This includes the designation of Primary Retail Cores and Town Centres for Bangor and Holywood with the addition of a Primary Retail Frontage for Bangor.
- 5.3 Within draft BMAP, the policy for Primary Retail Cores resists nonretail uses at ground floor and outside designated primary retail cores and within town centres, retail will only be acceptable where it can be demonstrated that there is no suitable site for the proposed development within the Primary Retail Core. This is to support the vitality and viability of our town centres by ensuring they are the main focus for all retail developments.
- 5.4 Primary Retail Frontages comprise those parts of a town centre which should predominately be retained in retail use. The policy within draft BMAP will resist proposals for non-retail uses at ground floor level within Primary Retail Frontages in order to retain the focus of retail uses and ensure the maintenance of a compact shopping environment. Following the Public Inquiry to draft BMAP, it was recommended that the retail policy was strengthened within Primary Retail Cores and Primary Retail Frontages so that no more than 25% of the frontage of the shopping street(s) to which it relates is in non-retail use and no more than three adjacent units are in non-retail use. Outside designated Primary Retail Cores, planning permission will only be granted for comparison and mixed retail development where it can be demonstrated that there is no suitable site within the Primary Retail Core.

- 5.5 Draft BMAP also designates two District Centres at Bloomfield and Springhill which are intended to co-exist with the town centres and fulfil a complementary role.
- 5.6 The BMA Office Strategy includes the promotion of office development in Bangor and Holywood town centres in order to protect and enhance their vitality and viability, to assist urban renaissance and to provide jobs in local areas. It also provides for office development of an appropriate scale within designated shopping/commercial areas in order to provide local services. (BMA Office Strategy and Policy OF 1, p. 88-90, Part 3 Volume 1 Plan Strategy & Framework).
- 5.7 An objection was received in relation to the non-designation of lands at Ashbury Avenue as a local centre in draft BMAP. At the public inquiry, the Department agreed that the site met the requirements for designation as a Local Centre and requested that the Planning Appeals Commission (PAC) recommend its designation in the Plan. The PAC considered the site contained sufficient retail floorspace and other complementary uses to warrant its designation as a Local Centre in accordance with prevailing planning policy at the time. This recommendation was accepted by the Department and carried forward in the designation of BR 13 Ashbury Local Centre in the unlawfully adopted BMAP. Therefore, it is likely that when dBMAP is lawfully adopted, the designation of Ashbury Avenue as a Local Centre will be adopted.

[Ards and Down Area Plan 2015 \(ADAP\)](#)

- 5.8 The ADAP was adopted in 2009 and relates to the legacy Ards Borough Council area. The Ards and Down Area Plan 2015 (ADAP) sets out the retail hierarchy for the former Ards Borough Council area including the designation of a Primary Retail Core and Town Centre for Newtownards and Town Centres for Donaghadee and Comber. Local Centres are designated at Stratheden Heights and Scrabo Estate in Newtownards. There are no designated District Centres.

[Cross Boundary Policy Context](#)

- 5.9 Throughout the LDP process it has been important to take the position of other councils and particularly our neighbouring councils into account. Ards and North Down Borough is bounded by Belfast City, Lisburn and Castlereagh City and Newry, Mourne and Down Council areas, each of which is at different stages in the formulation of their own LDP.

Table 1: Neighbouring Councils Position on Town Centres and Retailing.

Neighbouring Council	Position
Belfast City Council	<p>Belfast City Council Local Development Plan Strategy was adopted on 2nd May 2023.</p> <p>Policy RET 1- Establishing a Centre Hierarchy</p> <p>Policy RET 2- Out of Centre Development</p> <p>Policy RET3 – District Centres, Local Centres and City Corridors</p> <p>Policy RET4 – Retail Warehousing</p> <p>Policy RET5 – Primary Retail Area</p> <p>Policy RET6 – Temporary and Meanwhile Uses</p> <p>Policy CC1 – Development Opportunity Sites</p> <p>These policies acknowledge the distinctive role of Belfast as the primary location for retail in the region and adopt a sequential approach providing an appropriate scale of retailing and town centre uses.</p>
Lisburn and Castlereagh City Council	<p>The Lisburn and Castlereagh City Council Local Development Plan Strategy was adopted on 26th September 2023.</p> <p>TC1-Town Centre, Retailing and Other Uses</p> <p>TC2- Lisburn City Centre Primary Retail Core and Retail Frontage</p> <p>TC3-Town Centres</p> <p>TC4-District and Local Centres</p> <p>TC5- Villages and Small Settlements</p> <p>TC6- Petrol Filling Stations and Roadside Service Facilities</p> <p>These policies seek to protect the role of Lisburn City Centre adopting a sequential approach which also seeks to strengthen the town centres and allowing appropriate development within district and local centres as well as villages and small settlements.</p>

Newry, Mourne and Down District Council (NM & D)	<p>The NM&D draft Plan Strategy was published on 27th June 2025.</p> <p>Policy RET1- Town Centre First</p> <p>Policy RET2- Primary Retail Core and Primary Retail Frontage</p> <p>Policy RET3- Retail Impact Assessment and Assessment of Need</p> <p>Policy RET 4- Retail Development Outside City and Town Centres</p> <p>Policy RET 5- Local Centres</p> <p>Policy RET 6- Retail Development in Villages and Small Settlements</p> <p>Policy RET 7- Retail Development in the Countryside</p> <p>These policies seek to ensure the appropriate location for retail development based upon the retail hierarchy protecting town centres whilst allowing appropriate retail development in smaller settlements and the countryside.</p>
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- 5.10 The Council has engaged with each neighbouring Council's POP consultation as well as the dPS consultations of Belfast City Council and Lisburn and Castlereagh City Council.
- 5.11 Professional officers from the LDP team also take part in a number of cross council forums including the Metropolitan Spatial Working Group and the Development Plan Working Group.
- 5.12 Most recently, online engagement on the Council's draft Plan Strategy was held with the three neighbouring councils in March 2025. This included discussion around the proposed growth strategy, strategic housing and employment land allocation, settlement hierarchy, strategic approach to climate change and mitigation, alongside operational policies. This included the identification of specific cross-boundary issues.

6.0 PROFILE OF RETAILING AND TOWN CENTRES IN ARDS AND NORTH DOWN

Existing Retail Hierarchy

- 6.1 Retail provision in the Borough is distributed throughout the current hierarchy of designations including Primary Retail Cores and Town, District and Local Centres. Retailing is also present at a number of 'Out of Centre' locations.
- 6.2 The Borough's existing retail hierarchy currently comprises: one Primary Retail Frontage; three Primary Retail Cores; five Town Centres; two District Centres and two Local Centres as defined in the Draft Belfast Metropolitan Area Plan 2015 and the Ards and North Down Area Plan 2015.

Settlement	Designation	Plan Reference
Draft Belfast Metropolitan Area Plan 2015		
Bangor	Bangor Town Centre	BR 39
	Bangor Primary Retail Core	BR 40
	Bangor Primary Retail Frontage	BR 41
	Bloomfield District Centre	BR 13/01
	Springhill District Centre	BR 13/02
Holywood	Holywood Town Centre	HD 22
	Holywood Primary Retail Core	HD 23
Ards and Down Area Plan 2015		
Newtownards	Newtownards Town Centre	NS 44
	Newtownards Primary Retail Core	NS 45
	Stratheden Heights Local Centre Scrabo Estate Local Centre	NS 48
Comber	Comber Town Centre	CR 19
Donaghadee	Donaghadee Town Centre	DE 22

- 6.3 Notable 'Out of Centre' retailing is located at Bloomfield, Clandeboye and Balloo Retail Parks in Bangor and at Ards Shopping Centre and Castlebawn Retail Park in Newtownards.

Retail and Commercial Leisure Study

- 6.4 In October 2021, Ards and North Down Borough Council commissioned Nexus Planning to carry out a retail and commercial leisure study¹ to provide an up-to-date, objective assessment of retail and leisure development needs in the Borough and consider possible strategic policy responses to any prevalent or emerging issues. The study includes a review of retail policy, summarises key current and future retail trends and provides a health check assessment of centres along with a benchmarking exercise. Of key importance, the study also included a telephone survey of 604 households, utilising the results to inform a quantitative analysis of the turnover of specific retailers, towns and other destinations, as well as its qualitative findings on attitudes and perceptions of different centres. The study provides guidance to inform the emerging Local Development Plan on the hierarchy of centres; the spatial extent of centres; recommended planning policy approach; and compliance with the LDP 'Soundness' test.

Town Centre Health Checks

- 6.5 Nexus carried out health checks for town centres (Bangor, Newtownards, Comber, Donaghadee and Holywood), district centres (Ards Shopping Centre, Bloomfield Shopping Centre, and Springhill) and potential Centres (Ballygowan and Portaferry).
- 6.6 Health checks are important planning 'tools' for appraising and monitoring the changes in the overall vitality and viability of town centres, and informing both plan-making and decision-taking at a local level. Nexus used the key performance indicators for health checks set out in the SPPS and formulated a robust methodology including engagement with relevant stakeholders, gathering evidence on retail composition and diversity of uses and commercial demand. The 604 household surveys also formed a key part of this analysis.

¹ See Technical Supplement 6A Retail and Commercial Leisure Study

Town Centre Benchmarking

- 6.7 The retail study also included a comparative review of the performance of Bangor and Newtownards and against Antrim, Coleraine and Newry and the performance of Holywood, Comber and Donaghadee against Kilkeel, Randalstown and Portrush.
- 6.8 Bangor and Newtownards were found to have a stronger emphasis on services with a lower emphasis on convenience and comparison goods shopping than the comparative towns. The proportion of vacant units is lower in Bangor and Newtownards than in the comparative towns however the average market rent per square foot is lower.
- 6.9 Comparative to Kilkeel, Randalstown and Portrush; Holywood, Comber and Donaghadee were found to have a stronger emphasis on services. The number of vacant units is lower and the average market rent per square foot is similar.
- 6.10 This focus on service provision within the Borough may be due to the large District Centres, which have significant quantities of comparison goods floorspace, underpinned by a large foodstore.
- 6.11 The town centre health checks did flag some areas of concern; however, the benchmarking exercise shows lower vacancy rates than the comparators. The shifting nature of town centres is in the provision of services and leisure uses, and away from traditional retail. The retail study therefore concludes that town centres within the borough have positioned themselves as town centres of the future.

The Spatial Extent of Centres

- 6.12 The study identified that there was very little need for any projected future floorspace and if that need does arise, it can be accommodated within existing vacant units or land.
- 6.13 Given the evolving nature of the High Street, trends towards online shopping and the lasting impact of the pandemic, the report suggests that primary retail cores should only be designated in the main town centres.
- 6.14 The report also considered town centre boundaries and delineated or amended centre boundaries for each of the ten centres. These recommendations will be considered further at LPP stage to help inform a review of the existing designations against the prevailing evidence and strategic approach of the Council.

Policy Recommendations

6.15 Based upon the findings of the Retail and Commercial Leisure study, Nexus made the following recommendations to guide policy:

- A town centres first approach which supports proposals that promote the identified centres as the preferred locations for town centre uses, including retail, leisure, office, visitor accommodation and appropriate residential and community facilities.
- Protection of existing retail frontages and their loss to other uses within primary retail cores with a more flexible approach elsewhere.
- The requirement for impact, need and sequential testing for town centre uses to ensure that retail development outside of identified centres in the retail hierarchy will only accord with the plan where it has been demonstrated that there are no suitable, available and viable sites within nearby town centre boundaries under the sequential test, and that there would be no significant adverse impact on any Centre in the Retail Hierarchy.

The Belfast Region City Deal

- 6.16 The Belfast Region City Deal is a bespoke package of investment from central government to support the shared vision of “Inclusive economic growth that delivers more and better jobs, a positive impact on the most deprived communities and a balanced spread of benefits across the region”.
- 6.17 The substantial financial commitment, which will be further supplemented by the private sector, will be delivered over the next 10-15 years- an exciting, once in a generation opportunity to accelerate economic growth for the region in an inclusive and sustainable way. The ambitions for inclusive growth will be delivered through 4 pillars of investment- Innovation and Digital, Tourism and Regeneration, Infrastructure and Employability and Skills.
- 6.18 As a flagship project, Ards and North Down Borough Council is progressing ambitious plans to redevelop a 2.2 mile stretch of the seafront to help establish Bangor as a thriving town and prime visitor attraction in Northern Ireland. The vision is to seamlessly connect the waterfront to the rest of the town and, in so doing, provide a unique range of opportunities for residents and visitors to have their lives and businesses enriched by a mix of public spaces, creative events, activities, attractions and experiences. Some of these proposals fall within the town centre boundary of Bangor and/or provide enhanced linkages to the town centre.

Queens Parade, Bangor

- 6.19 The regeneration scheme at Queen's Parade, Bangor is a £50million investment providing retail, residential, office, entertainment and hotel space as well as open space and community facilities. It is hoped that regeneration of this site, within the Bangor town centre boundary will bring economic success to the wider town. Development of the Marine Gardens part of the site commenced in September 2025.

7.0 PREFERRED OPTIONS PAPER

- 7.1 The Preferred Options Paper (POP), published in March 2019 was the first formal stage in the preparation of the LDP for the Borough. It was designed to promote debate in relation to a range of strategic planning issues that have been identified in the Borough. The POP identified 42 key planning issues within the Borough and examined options for addressing these issues. In each case, a preferred option was highlighted and the rationale for selection of this option was given.
- 7.2 The POP also includes a review of the existing operational planning policies, largely contained within the suite of Planning Policy Statements. This review stimulated public debate on whether the existing policies are still suitable or whether a different approach would be more appropriate to meet local circumstances.
- 7.3 Following a minor revision to the online version of the POP, the 12 week consultation period was relaunched therefore the total consultation period from the official launch was 19 weeks.

POP Representations

- 7.4 The following key issues are of particular relevance to town centres and retailing:

7.5 **Key Issue 32 - Hierarchy of Centres.**

The preferred option was option 32a 'Define a hierarchy of centres based on the preferred settlement hierarchy and the relevant roles and functions of our centres.' The preferred option will align the hierarchy of centres with the settlement hierarchy contained within the Growth Strategy which classifies settlements according to their roles and functions and will allow district centres and local centres to be included. It will also allow a review of the

existing hierarchy of centres, and identify new centres where appropriate, or make adjustments to existing centres classification to accurately reflect their roles and functions.

- 7.6 Of those who responded to the relevant question in the POP questionnaire, 65.38% agreed with the proposed option, 30.77% were unsure and 3.85% disagreed. Statutory consultees were supportive of this option.

7.7 Key Issue 33 - Spatial extent of town centres and retail cores.

The preferred option was option 33a: 'Define the spatial extent of town centre boundaries and primary retail cores to accommodate the projected need for retail and other main town centre uses.' This preferred approach will allow the existing spatial extent of town centre boundaries and primary retail cores to be reviewed and altered, where appropriate, to reflect the locally distinct character of the Borough's town centres and primary retail cores.

- 7.8 Of those who responded to the relevant question in the POP questionnaire, 59.09% agreed with the proposed option, 31.82% were unsure and 9.09% disagreed. Statutory consultees were supportive of this option.

7.9 Key Issue 34 - Protecting and enhancing diversity of use – Designated Primary Retail Cores.

The preferred option was option 34c 'Designated Primary Retail Cores to be accompanied by policy to allow differing provision of retail and town centre uses based upon locally distinct character' which would allow a more tailored approach to town centre uses within Primary Retail Cores and allow consideration of proposals based upon the locally distinct character of each of the Borough's towns as detailed in the evidence base.

- 7.10 Of those who responded to the relevant question in the POP questionnaire, 63.64% agreed with the proposed option, the remaining 36.36% were unsure and no respondents disagreed. In their consultation response, DfI stated that careful management of such an approach would be required in order to ensure that it does not have unintended consequence and give rise to vacancy or dereliction.

7.11 Key Issue 35: Protecting and enhancing diversity of use – Protection of existing areas of housing within town centres.

The preferred option was option 35a 'Identify areas of existing housing to be protected and promote new housing development, if appropriate to the character of the area, within town centres.' The preferred option will allow the promotion of housing development and the retention of existing housing stock in central areas to take advantage of proximity to existing facilities, services,

infrastructure, and public transport provision and reduce dependence on private vehicles.

- 7.12 Of those who responded to the relevant question in the POP questionnaire, 82.61% agreed with the proposed option, 13.04% were unsure and 4.35% disagreed. Statutory consultees were supportive of this option.

7.13 **Key Issue 36: Protecting and enhancing diversity of use – Development Opportunity Sites.**

The preferred option was option 36a: 'Define Development Opportunity Sites for mixed use and encourage 'meanwhile' uses until development is commenced.' This preferred option will allow a review of existing DOSs and allow the Council to consider the varied uptake of the designated sites. It will also be in accordance with the SPPS which states that the LDP should 'allocate a range of suitable sites to meet the scale and form of retailing and other town centre uses.

- 7.14 Of those who responded to the relevant question in the POP questionnaire, 69.57% agreed with the proposed option, 21.74% were unsure and 8.70% disagreed. Statutory consultees were supportive of this option.

- 7.15 For further details on the POP consultation, please see the Preferred Options Consultation Report on the Council website.

Consultee Engagement

- 7.16 The Department for Infrastructure was generally supportive of the preferred options proposed however stated that further details were required on option 34c which sought to introduce policy that would allow differing provision of retail and town centre uses based on the locally distinct character of each of the Borough's towns. It was felt that careful management of such an approach would be required in order to ensure that it does not have unintended consequence and give rise to vacancy or dereliction. In terms of option 36a which seeks to define Development Opportunity Sites for mixed use and encourage 'meanwhile' uses until development is commenced, the Department reminded the Council that a call for sites consultation exercise should be undertaken and that preference will be given to edge of town centre sites before considering out of centre sites.
- 7.17 Department for Communities, Historic Environment Division (HED) advise caution must be taken not to promote a retail core on economic grounds at the expense of other policies, e.g. SPPS strategic objectives towards the protection, conservation and enhancement of our archaeology and built heritage. They also advise that the designation of a centre which already has

high rates of vacancy, for retail focus has the potential to stifle potential re-use of historic buildings for other uses, e.g.office/professional use and/or dwellings – some flexibility should be provided in policy.

- 7.18 HED also highlight that a town centre with small single purpose shops has the potential to be adversely impacted by the construction of a large store with multiple service offerings, leading to further vacancy of single purpose shops which can be part of the distinctive character of our settlements.
- 7.19 Invest NI highlighted that the SPPS sets direction to promote town centres for retail and complimentary uses including office. Invest NI would encourage the Council to also consider permitting businesses on upper floors of town centre properties that may, for example, have retail use at a lower level. They stated that ‘working over the shop’ is an important economic use within centres, is commercially attractive for employers, is compatible with the character and function of this area and can contribute to a vibrant and attractive central area throughout the day.

Council and Councillor Engagement

- 7.20 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. Officers from the LDP team have taken part in a series of Community Plan thematic group meetings and engagement events. Furthermore, members of the community plan team have also attended LDP workshops and sustainability appraisal meetings.
- 7.21 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Department from Infrastructure (DfI). Accordingly, Elected Members have also been engaged in the development of the draft Plan Strategy, to ensure that the document generally aligns with the Council’s strategic priorities. This engagement was facilitated through a Council workshop. The was held on 19th February 2020, provided an introduction to the topic and focussed on policy. Background papers were circulated to all members prior to these events. Members were largely supportive of modifications to the policy.
- 7.22 The draft of the Plan Strategy which included policies for town centres and retailing was presented in confidence to full Council in September 2022. It was agreed in principle by members. Post Sustainability Appraisal (SA), a number of amendments to policy were made and brought before Planning Committee for agreement in 2024, with final approval secured at a Special Planning Committee meeting held on 20 January 2025 and ratified at the full Council meeting on 29 January 2025.

Development Management Team

- 7.23 The LDP team has engaged with Development Management (DM) colleagues throughout the preparation of the draft Plan Strategy with an initial meeting occurring in January 2020 in advance of workshopping policy with Elected Members in February 2020.
- 7.24 Some of the issues that emerged included how to address the future use of upper floors in town centres, and that exceptions should be included for small local shops. Policy to restrict non-retail uses within PRCs was discussed, with colleagues reflecting on its lack of success in Bangor. Discussion was also held around the need for a robust policy for District Centres to combat over-trading.

8.0 DRAFT PLAN STRATEGY APPROACH

- 8.1 The draft Plan Strategy provides a policy approach for town centres and retailing, and, as set out above, has evolved from a consideration of a range of other factors including:
- the Council's Community Plan and other relevant strategies;
 - regional strategic policy contained within the RDS and SPPS;
 - the evidence base including the 'Retail and Commercial Leisure Study'² (Nexus, 2022);
 - consultation through both the formal POP consultation process and informal consultation with statutory consultees;
 - consultation with neighbouring councils;
 - engagement with Elected Members;
 - engagement with internal planning colleagues and cross-Council colleagues; and

² See Technical Supplement 6A Retail and Commercial Leisure Study

- Sustainability Appraisal.

8.2 The draft Plan Strategy approach is to promote and support the Borough's town centres as the preferred locations for the development of retail, leisure (including evening economy uses), offices, visitor accommodation, and appropriate housing and community facilities.

Retail Centre Hierarchy

8.3 The proposed retail hierarchy has evolved from the POP, aligned with the draft settlement hierarchy and informed by the evidence base including the 'Retail and Commercial Leisure Study'³ (Nexus, 2022). A range of criteria were engaged including population (2011 Census), number of units, comparison and convenience goods market share, convenience goods provision and community services provision. Except where specified, the spatial extent of the centre boundaries shall be as per the extant plans until such time as they are reviewed and defined at Local Policies Plan (LPP) stage.

Table 2: Policy RH 1 - Retail Centre Hierarchy

Tier	Role	Centre
1 – Large Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses, cultural, leisure and community facilities to a significant hinterland which includes smaller neighbouring towns or a number of suburbs	Bangor Newtownards
2 – Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses, leisure and community facilities to a hinterland which includes neighbouring villages or a few surrounding suburbs	Hollywood Comber Donaghadee Portaferry

³ See Technical Supplement 6A Retail and Commercial Leisure Study

3 – District Centres	Provides (or has the potential to provide) a range of shops, services, and businesses to a surrounding suburban community. Usually underpinned by a large foodstore	Bloomfield Springhill Ards
4 – Local Centres	Provides (or has the potential to provide) a range of accessible small scale convenience shops, retail services and community facilities with a focus on local, everyday need such as a general grocery store, sub-post office, small pharmacy etc.	Stratheden Heights Ashbury Avenue

- 8.4 The Council proposes a four-tier hierarchy, making a distinction at the top of the hierarchy between ‘large town centres’ comprising Bangor and Newtownards, and ‘town centres’ comprising Comber, Holywood, Donaghadee and Portaferry. This distinction was made to align with the elevation of Bangor and Newtownards, the settlement hierarchy and also in recognition of their having the greatest catchment population and number of retail units as well as offering a range of leisure, business, community and cultural uses.
- 8.5 Despite the conferment of city status on Bangor in 2022, the evidence supports its classification as a ‘large town centre’ as opposed to a ‘city centre’ for retail purposes. This approach is consistent with that of the Settlement Hierarchy wherein Bangor is designated as a principal settlement based on the evidence of the settlement appraisals⁴, despite its city status.
- 8.6 Currently, Portaferry was found to cater primarily for the very immediate local population’s essential needs and for seasonal tourists. Therefore, the ‘Retail and Commercial Leisure Study’ recommended Portaferry be classified as a ‘local centre’ in respect of its current market share of convenience and comparison goods and its community facilities and services. However, given aspirations to regenerate and promote its commercial core and in recognition of its designation as a town in the settlement hierarchy, Council has opted to classify Portaferry as having a ‘town centre’ with the spatial boundary to be

⁴ See Technical Supplement 1 ‘Settlement Hierarchy and Settlement Evaluation’.

defined at LPP stage. This is also consistent with local centres comprising smaller groups of convenience shops and retail services outside town centres within larger towns.

- 8.7 District Centres are the third tier comprising Springhill and Bloomfield – both of which were designated in draft BMAP 2015 – and Ards Shopping Centre. Ards received no designation in ADAP 2015 but complements the town centre with its convenience and comparison offer and is served by public transport. It was recognised as a de facto district centre by the Planning Appeals Commission (PAC) in its report of the Article 31 hearing into a planning application for the redevelopment of the former Scrabo High School site (X/2010/0819). In that report the PAC concluded, *“that the grouping of shops within ASC [Ards Shopping Centre] broadly falls within the definition of a District Centre, and it should be regarded as such for the purposes of applying PPS 5”*.
- 8.8 The Council will define the spatial extent of Ards district centre at LPP stage, alongside reviewing the redefining (where necessary) the boundaries for Springhill and Bloomfield district centres. Until this time, the extant boundaries as defined in draft BMAP shall be retained.
- 8.9 The evidence base does not support the designation of Ballygowan as a town for the purposes of the settlement hierarchy, nor does it demonstrate a retail and/or community function which would justify its classification within the retail hierarchy.
- 8.10 Local Centres are the fourth tier in the retail hierarchy - comprising Stratheden Heights in Newtownards as per extant designation in ADAP and Ashbury Avenue in Bangor as per its designation in the unlawfully adopted BMAP⁵. Scrabo Estate was also recognised as a local centre in ADAP; however, it was subsequently redeveloped for social housing. The retail study carried out by Nexus in 2022 did not support the designation of any additional local centres.
- 8.11 Village centres and rural centres sit outside the hierarchy but play an important role in rural communities through meeting local shopping and service needs and supporting the vitality of rural settlements.

⁵ See para 5.1 of this document for further information.

Retailing and Main Town Centre Uses

- 8.12 In line with the direction in the SPPS, the Council policy aims to establish town centres as the appropriate first choice location for retailing and other complementary functions. Policy RET 1 sets out a sequential test to ensure that retail and other main town centre uses are directed towards the Primary Retail Core (PRC), then town centre sites outside the PRC before considering accessible 'edge of centre' sites. Applicants must demonstrate that the sequentially preferable sites are neither suitable, available nor viable before finally considering other 'out of centre' locations. Applications which cannot demonstrate this will be refused.
- 8.13 Following discussion with colleagues in Development Management and engagement with Elected Members, the policy was refined to introduce additional criteria addressing quality design, that proposals support the vitality and viability of the town centre, and that access to upper floors is retained so as not to prejudice their future use. Policy RET 1 also contains an exception for local small-scale convenience shops or retail services to meet a local defined need in a settlement outside of designated town and district centres.
- 8.14 The POP contains a preferred option for a tailored policy approach within primary retail cores based upon locally distinct character – to include policy governing protection of existing retail frontages and the loss of retail to other uses. However, following further engagement with DM colleagues and Elected Members, concerns were raised over the impact of such a policy as this approach has not been successful to date in Bangor town centre. Furthermore, it was argued that Newtownards town centre has been flourishing without such policy interventions and that unintended consequences may result on its vitality and viability. Such an approach also seems somewhat at odds with the SPPS approach which widens the town centre approach from purely retail to 'other main town centre uses'⁶. Ultimately, this approach was not brought forward in the final policy draft.

District Centres

- 8.15 District centres have an important complementary role to town centres in the retail hierarchy, providing a range of shops and services to surrounding

⁶ As per the SPPS, this includes cultural and community facilities, retail, leisure, entertainment and business.

suburban communities. However, in some instances they are overtrading and out-competing nearby town centres⁷.

- 8.16 The policy approach aims to retain and consolidate district centres consistent with the SPPS direction that they be a focus for local shopping and complementary to the role and function of the town centre.
- 8.17 The Council therefore proposes to restrict proposals that may impact adversely on the vitality and viability of the town centres, including proposals for additional comparison goods floor space, the subdivision of retail units into smaller units, and varying or removing planning restrictions to provide unencumbered retail uses.

Local Centres

- 8.18 The Council seeks to maintain the role of local centres in accordance with their role within the retail hierarchy as centres of retail and services to sustain communities and cater to local everyday needs. The policy approach limits the nature and scale of retail proposals in local centres to ensure their role remains complementary to town and district centres. Provision is also made for small-scale complementary uses within a local centre such as food outlets.

Villages and Small Settlements

- 8.19 Local shops in villages and small settlements are relied upon by the rural population to meet day-to-day needs and provide services – particularly for those with limited or no access to a means of transport.
- 8.20 The policy approach seeks to allow for local retailing and retail service opportunities in rural centres where they meet a local need and are appropriate to the character and function of the village or small settlement. Further criteria were introduced to secure proposals seek to make a positive design contribution and are as accessible as possible to the resident population.

⁷ See Technical Supplement 6A Retail and Commercial Leisure Study

Retailing in the Countryside

- 8.21 The Council's approach to retailing in the countryside in RET 5 is consistent with that of the SPPS in that there is a general presumption against retail facilities which will normally be directed to the appropriate centre within the retail hierarchy. An exception is made, in principle, for some retail facilities of an appropriate type and scale which would typically be ancillary to an existing countryside use such as farm shops, craft shops, and those connected with tourism and recreational facilities. Further criteria specify that these should be located within existing buildings where possible and not adversely affect other centres in the catchment area.
- 8.22 The second part of RET 5 is concerned with refuelling stations in the countryside. Whilst refuelling stations provide an important service, there is a recent trend towards developing larger scale convenience retail facilities alongside refuelling stations. Therefore, the policy approach requires a clear indication of need and that there are 12 miles between existing services. New retail floorspace shall also be limited to retail convenience of 100m² and ancillary to fuel sales.
- 8.23 The Council reworded the policy to 'refuelling stations' to reflect the changing nature of vehicular fuelling (including electric charging and other emerging technology) in the context of the climate emergency.

Out of Centre Development

- 8.24 Policy RET 1 sets out a sequential test for retail development and other main town centre uses. Proposals that are not located within an existing town centre will be refused unless it can be demonstrated that a sequentially preferable site is not available.
- 8.25 Policy RET 6 requires that such out of centre development must be accompanied by a retail impact assessment and assessment of need where the retail floor space is 1,000m² and above. The policy sets out the factors to be addressed in these assessments and states that where an impact is considered significantly adverse or harmful, then the development will be refused.
- 8.26 This policy approach is consistent with the regional strategic approach set out in the SPPS. The Nexus study⁸ considered the appropriateness of the

⁸ See Technical Supplement 6A Retail and Commercial Leisure Study

1,000m² threshold for the retail impact assessment to be engaged and confirmed that this was suitable for the Borough.

9.0 SOUNDNESS

- 9.1 The LDP has been prepared to meet 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 town centres and retailing subject policies and other relevant policies in the document are regarded as sound, as it is considered to have met the various tests of soundness as summarised below:

Table 3: Consideration of Soundness

Procedural Tests	
P2	The town centres and retailing policies have evolved from the POP, POP consultation Report and Consultee, Development Management and Councillor Engagement as described in earlier sections of this document.
P3	The town centres and retailing policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	The town centres and retailing policies have taken account of the RDS in particular RG1 and RG 7 and SFG 1.
C2	The town centres and retailing policies have taken account of our Community Plan, particularly outcome 4.
C3	The town centres and retailing policies have taken account of existing planning policies as contained within the SPPS, in particular paragraphs 6.267- 6.292.
C4	The town centres and retailing policies have taken account of the existing development plans within Ards and North Down, ongoing Council initiatives and the neighbouring council context.

Coherence and Effectiveness Tests	
CE1	The town centres and retailing policies have taken account of the emerging LDP's of our three neighbouring Councils, and are not considered to be in conflict with them.
CE2	The town centres and retailing policies are founded on a robust evidence base which includes the baseline information assembled in the Town Centres and Retailing Position Paper, the POP and responses to it and subsequent consultation with consultees, including Dfl.
CE3	As part of the monitoring process, Council will monitor approvals for main town centre uses, approvals in district centres, and approvals in local centres.
CE4	Town centres and retailing policies will be reviewed at Plan Review stage. Where possible, the need for flexibility has been considered in the strategic approach and draft policies. There will be flexibility at Local Policies Plan stage to review existing and introduce new designations provided this is underpinned by a sound evidence base.