



**Mid and East Antrim Borough Council**

**Local Development Plan 2030**

**Draft Plan Strategy**

**Invest NI Comments – December 2019**

1. Invest NI welcomes the opportunity to consider the soundness of the Mid and East Antrim Local Development Plan Draft Plan Strategy 2030 (the draft Strategy). Our comments should be read in conjunction with those made in relation to the Council's Preferred Options Paper (POP) in September 2017, which we have enclosed along with these comments.
2. It is noted within the Strategic Planning Policy Statement (SPPS) that Councils in preparing their Local Development Plans (LDP) must take account of the RDS 2035, the Sustainable Development Strategy for Northern Ireland, the SPPS and any other policies or advice in guidance issued by the Department
3. In considering our comments we have taken account of the strategic direction set out within the Regional Development Strategy 2035 (RDS), the Strategic Planning Policy Statement (SPPS), Planning Policy Statement 4 (PPS4) as well as the Council's Community Plan.
4. As the regional business development agency for Northern Ireland Invest NI's role is to grow the local economy. For this reason our specific focus in reviewing the aforementioned documents has been on those elements of each that relate to economic development or, in our view, could have a particular resonance with economic growth.
5. As noted in our response to the POP Invest NI can only speak on behalf of the spatial needs of those businesses meeting its intervention criteria, these will primarily be those which can drive productivity and make the greatest contribution to growing the economy. These include both indigenous and foreign owned businesses.

**Plan Vision and Strategic Objectives**

6. Invest NI notes the economic profile of the borough as set out on Page 36, that the economy is focussed on the three main towns of Ballymena, Larne

and Carrickfergus and that between 2016 and 2017 Mid and East Antrim had the second highest rate of business births in Northern Ireland.

7. Invest NI notes the strategic objectives linked to economic growth as detailed on Page 44. These are as follows

- To provide a sufficient supply and choice of sites for business and employment uses so as to assist in promoting sustainable economic growth in Mid and East Antrim and in meeting the locational needs of particular sectors , including new and emerging sectors
- To support and sustain vibrant town centres in Ballymena, Larne and Carrickfergus.
- To protect strategically important transportation assets and routes (including disused transport routes) and, where possible, to facilitate enhanced connectivity within Mid and East Antrim and between the Borough and other centres.
- To support tourism as a key growth sector in Mid and East Antrim by facilitating opportunities for sustainable tourism development and by safeguarding key tourism assets from inappropriate development.
- To facilitate sustainable economic development in the countryside, provided it is suitably located and is of an appropriate nature and scale for the rural context.
- To facilitate the provision or upgrading of public utilities infrastructure (including water, wastewater, energy and telecommunications) to meet economic and community needs.
- To support the generation of energy, particularly from renewable sources, in a balanced way that takes due account of environmental impacts and on sensitive or vulnerable landscapes.

## **Spatial Growth Strategy and Countryside Strategy**

8. Invest NI notes the Spatial Growth Strategy as set out within table SGS1 on Page 52. The Council plans to manage growth to secure sustainable patterns of development across Mid and East Antrim. The focus of economic development will be Ballymena, Carrickfergus and Larne as the prime locations for business, retail, housing, administration, leisure and cultural facilities. Appropriate growth will also be facilitated in the small towns and sustainable development in the open countryside balancing the

need to protect the environment and rural character whilst sustaining a strong and vibrant community.

9. Invest NI notes the Settlement Hierarchy as set out within table SGS2 on Page 58.

## **Economic Development Strategy**

10. Invest NI notes that the Council commissioned CBRE to conduct an audit of existing accommodation for a range of economic development purposes including office, start-up and grow-on space. For industrial stock consideration was also given to availability, vacant levels, demand, location and quality and commented on the suitability of undeveloped industrial land.
11. A number of recommendations were made in this report in respect of Enterprise Centres and property either currently or last used for economic development purposes. Whilst this would not be the appropriate forum to comment on specific recommendations, Invest NI would expect that its views may be sought through the development management process should proposals come forward and, in principle, these recommendations should be considered in light of the rest of the Plan Strategy.
12. If, however, it is the Council's considered opinion that any such land or property is no longer suitable for modern economic development purposes Invest NI would expect that any re-zoning exercise would not see a reduction in the overall supply of available employment land across the district and that any other proposed policy changes should also be catered for in the Local Policies Plan.
13. Paragraph 5.4.15 on Page 72 confirms the policy aims of the LDP namely
  - To ensure there is a generous supply of suitable land to meet economic development needs within the Borough over the Plan period; offering a range and choice in terms of quality.
  - To allocate an appropriate amount of economic land for each of the three main towns in Mid and East Antrim in line with the Spatial Growth Strategy
  - To provide a spatial framework for the application of economic development operational policies intended to deliver sustainable economic growth across the Borough.
14. Invest NI notes that the Council's 2017 'Industrial and Economic Development Land Monitor' suggested there is a generous supply of

undeveloped land which would be sufficient to provide the anticipated floorspace and jobs over the Plan period.

15. Table SGS6 on Page 73 sets out the proposed allocation of economic development land across the three main towns
  - Ballymena – 51 hectares
  - Carrickfergus – 73 hectares
  - Larne – 43 hectares
16. Zonings will be complemented by Policy ECD2 Retention of Economic Development Land which aims to protect land in settlements currently or last used for economic development use. Invest NI is supportive of this approach as it should ensure the protection of economic lands by zoning and policy provision.
17. A new portfolio of sites for economic development will be identified at the Local Policies Plan stage.
18. Invest NI notes that the LDP will also facilitate opportunities for appropriate business growth in the small towns. Within villages and smaller settlements land will not be zoned for economic development as this could inhibit flexibility. Favourable consideration will, however, be given to small scale proposals that will not compromise the LDP Spatial Growth Strategy and provided they are appropriate in scale, nature and design to the character of the settlement. The Council will continue to support and facilitate opportunities for sustainable economic development and diversification in the countryside.
19. Paragraph 5.4.20 states that vacant or underutilised lands within the settlements that were last used for economic development will also contribute to the supply of economic development land in the Borough.

## **General Policy for All Development**

20. Policy GP1 – The General Policy for All Development details the planning policy which all development proposals (except for minor) will be assessed against. All development proposals requiring planning permission, with the exception of minor, will be assessed against these criteria.
21. Invest NI welcomes the inclusion of such criteria as they can provide investors with greater clarity around the criteria by which their proposals will be assessed. We would restate the request from our POP response for any weighting (if applicable) to be noted against these.

## **Sustainable Economic Growth**

22. Invest NI notes from Page 121 that growing a sustainable economy and investing in the future is a key strategic priority of the Council. It is also noted that *“through the LDP, we [Mid and East Antrim Borough Council] will seek to ensure that the locational and land use needs of the various economic sectors are met in a sustainable manner for the benefit of all our citizens.”*
23. The strategic approach to economic development set out at paragraph 7.1.7 is to be welcomed. It aligns with the Regional Development Strategy and the SPPS which prioritise sustainable economic development, safeguard lands required for economic development use and protect approved/economic development use from incompatible land uses.
24. These policy aims will be primarily delivered through the strategic economic operational planning policies. The Local Policies Plan will also zone land for specific economic development uses, and identify land currently or last used for economic development purposes.

## **Policy ECD1 Economic Development in Settlements**

25. Invest NI notes that the Council proposes to carry forward PPS4 PED1 with minor amendments. Invest NI has no objection to this approach, we would, however, restate our position as set out in our response to the Preferred Options Paper (paragraph 31).

*“It is, however, worth highlighting that certain industries which would be considered as falling within the B1 Use Class may have a need for facilities such as clean rooms and/or R & D areas but may not be suitable for a town, district or local centre locations. We would assume that in such circumstances such businesses would not be required to demonstrate that there is no appropriate site within the centres to accommodate their scheme.”*

## **Policy ECD2 Retention of Economic Development Land**

26. This policy seeks the protection and retention of (i) land zoned for economic use and (ii) unzoned lands in settlements. In respect of (i) there is consistency with PED7 and paragraph 6.89 of the SPPS. Invest NI welcomes this departure from the previously stated position within the Preferred Options Paper. We welcome the presumption against retail and commercial leisure development on zoned economic development land except as an ancillary development.
27. As regards (ii) the policy as proposed represents a slight relaxation of the provisions of the SPPS and Policy PED7 of PPS4. Invest NI, however,

welcomes the inclusion of the criteria over the approach set out within the Preferred Options Paper.

28. Criterion (c) states that *“a development proposal that would result in the loss of land ...to other uses will only be permitted where the applicant can demonstrate that...the site is unsuitable for modern economic development purposes and there is no market interest in the site following one year of continuous active marketing”*.
29. Invest NI would suggest that one year could be a low threshold for demonstrating “no market interest” and that 36 months/three years might be more appropriate if the Council wishes to retain this provision. There may, for example, be circumstances in which a property has been vacated, such as through bankruptcy, where a one year timeframe may not allow sufficient time for a property to be properly marketed, a new owner identified and the transaction completed.
30. The policy refers continuous active marketing but does not provide any detail as to the evidence the Council would consider as offering sufficient proof. Invest NI would suggest that amplification of this policy would be helpful in identifying the robust evidence base required to allow such loss of an economic development land resource. Examples of such evidence could include marketing details such as property brochures from a property agent, links to listing on an agent’s website and/or a record of interests and viewings by potential occupiers.

### **Policy ECD3 Development Incompatible with Economic Development Uses**

31. This policy recognises that there will be development proposals brought forward that will not be compatible with an existing/operating or approved economic development use. The policy as proposed aligns with the policy provisions of Policy PED8 of PPS4 and paragraph 6.90 of the SPPS. Invest NI welcomes and supportive of the Council’s direction in this regard.

### **Policy ECD4 Economic Development in the Countryside**

32. This policy combined policies PED2 to PED6 of PPS4 as well as CTY4, 11 and 12 of PPS21. Invest NI, in principle, is supportive of continued economic development opportunities in the countryside and is broadly supportive of the Council’s direction in this regards.

### **Developer Contributions**

33. Invest NI notes a number of references to developer contributions/section 76 agreements through the draft Strategy in respect of mineral

development, residential development, the provision of open space but not economic development. We would restate the comments from our September 2017 response to the POP

“we note and welcome that developer contributions is not included as an overarching principle in this paper because it is unlikely to be sought for all developments”

34. If, as per paragraph 9.1.26, a decision is taken to bring forward a formal developer contribution framework Invest NI would welcome the opportunity to engage with the Council.

### **Integration of Transportation and Land Use**

35. Invest NI notes a number of references throughout the draft promoting integration between transport and new developments in line with Regional Strategy. In principle we have no objection to this but would remind the Council that for industrial developments there may be public safety issues. Industry by its nature can pose a range of dangers to the public, and particularly children, whether it is through industrial processes or traffic. With enhanced pedestrian and cycle linkages this enables greater public/non-industrial access to industrial property. Every effort should be made to minimise such risks.

### **Conclusion**

36. In terms of the draft Strategy’s economic elements Invest NI considers the proposals to be largely in conformity with the Council’s Community Plan, the RDS, PPS4 and the SPPS. A number of other issues have, however, been raised for further consideration &/or clarification.

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