

Local Development Plan 2030

# **Technical Supplement 5 Economic Development**

September 2019



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# 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 3 which provided baseline information on employment and economic development and formed part of the evidence base for the Preferred Options Paper (POP) which provided options on several economic development key issues. It provides an overview of the regional and local policy context and the economic baseline of Mid and East Antrim. In addition, it demonstrates how the various strands of the evidence base have been considered in the formulation of the draft Plan Strategy Economic Development Strategy as set out in SGS6 (Strategic Allocation of Land for Economic Development) and the Economic Development strategic subject policies in the draft Plan Strategy, including responses to the POP and ongoing consultee and councillor engagement.

# **Planning and Economic Development**

- 1.3 Growing a sustainable economy and investing in the future is a key strategic priority of the NI Executive. Planning can play a vital role in achieving a vibrant economy by managing development to help promote economic growth and deliver local employment and economic prosperity for the Borough. Effective planning also needs to be flexible enough to adapt to the ever changing needs of business in a highly competitive global environment.
- 1.4 In planning terms and for the purposes of planning policy, Economic Development relates to those uses defined under Part B Industrial and Business Uses of the Planning (Use Classes) Order (Northern Ireland) 2015 which include:

### PART B INDUSTRIAL AND BUSINESS USES

#### Class B1: Business

Use-

- (a) as an office other than a use within Class A2 (Financial, professional and other services);
- (b) as a call centre; or
- (c) for research and development which can be carried out without detriment to amenity by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

# Class B2: Light Industrial

Use for any industrial process which can be carried out without detriment to amenity by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

#### Class B3: General Industrial

Use for the carrying on of any industrial process other than one falling within Class B2.

# Class B4: Storage or distribution

Use for storage or as a distribution centre

# 2.0 Policy Context

# **Regional Policy Context**

### **Draft Programme for Government (PfG)**

2.1 The PfG adopts an outcomes based approach supported by a number of indicators that highlight the Executives desired direction of change. A key aim of the PfG is to grow a sustainable economy and this is reflected through a number of the outcomes and indicators within the PfG framework, including Outcome 12 'We have created a place where people want to live and work, visit and invest'. The role the LDP can play in delivering of the Programme for Government's economic, social and environmental outcomes is recognised.

# Regional Development Strategy 2035 (RDS)

- 2.2 The RDS sets the context for the sustainable development of NI to 2035 and is a long-term plan to deliver the spatial aspects of the PfG. It recognises the important role played by Belfast and Derry/Londonderry in generating prosperity and also reflects the PfG approach of balanced sub-regional growth to ensure that all places benefit from economic growth. It recognises the importance of key settlements as centres for growth and investment and defines these as Main Hubs and Clusters well placed to benefit from and add value to regional economic growth. The RDS recognises Ballymena and Larne towns as main hubs. Larne is also identified as a gateway due to its strategic coastal location with a natural harbour and one of the largest ports in NI. Carrickfergus is grouped within the major conurbation known as the Belfast Metropolitan Urban Area.
- 2.3 The RDS 2035 contains a Spatial Framework and Strategic Planning Guidelines based on focusing development in gateways (such as ports and airports), hubs and clusters (such as key towns and cities). It outlines two types of strategic guidance: Regional Guidance (RG) and Spatial Framework Guidance (SFG).
- 2.4 The RDS Regional Guidance (RG1) seeks to ensure an adequate supply of land to facilitate sustainable economic growth through the following means:
  - Assess the quality and viability of sites zoned for economic development uses in the area plans.
  - Protect zoned land in Development Plans, as it provides a valuable resource for local and external investment.
  - Promote economic development opportunities across the region focussed on the BMUA, Londonderry and Hubs as the main centres for employment and services – to capitalise on development opportunities provided by the concentration of people and goods combined with infrastructure and clustering of a range of business services essential to economic development.
  - Provide a network of economic development opportunities by making provision in development plans for an adequate and continuous supply of land for employment purposes.
- 2.5 Other economic development related guidance in the RDS includes the following:
  - SFG10 seeks to identify and consolidate the roles and functions of settlements within the Clusters;
  - SPG11 seeks promote economic development opportunities at Hubs; and
  - SPG13 aims to sustain rural communities living in smaller settlements and the open countryside.
- 2.5 To ensure the council area is well placed to accommodate growth in jobs and businesses there should be an adequate and available supply of employment land. It should be accessible and located to make best use of available services e.g. water and sewerage infrastructure, whilst avoiding, where possible, areas at risk from flooding. The RDS places the onus for this on LDPs and provides assistance through a methodology known as the Employment Land Evaluation Framework. The outworking of this methodology will enable the LDP to

identify a portfolio of employment sites sufficient to meet the requirements over the Plan period (see Table 2.1 below).

Table 2.1: The Employment Land Evaluation Framework

Stage 1  Taking Stock of the Existing Situation	An initial assessment of the 'fitness for purpose' including the environmental implications of the existing employment land portfolio. This is principally in order to identify the 'best' employment sites to be retained and protected and identifying sites that should clearly be released for other uses.
Stage 2 Understanding Future Requirements	Quantify the amount of employment land required across the main business sectors during the development plan period. This is achieved by assessing both demand and supply elements and assessing how they can be met in aggregate by the existing stock of business premises and by allocated sites. Account should also be taken of turnover of existing sites due to relocation or closures. Both short/medium term and strategic provision need to be considered in this process.
Stage 3  Identifying a 'New' portfolio of sites	Devise qualitative site appraisal criteria to determine which sites meet the occupier or developer needs. Confirm the existing sites to be retained, replaced or released, and any gaps in the portfolio. In this allocation, consideration should be given to previously used sites, and in the reallocation, the environmental impact of one site relative to others should be included. The results of Stage 2, together with this site appraisal should provide a robust justification for altering allocations for employment land.

- 2.6 The RDS also contains Spatial Framework Guidance to promote economic development opportunities at Hubs (SFG11). To achieve this it seeks to:
  - 1. Promote and exploit the potential for economic development Hubs are all performing economic roles and have potential for further economic expansion. Small businesses and service sector offices could locate in these towns.
  - 2. Consider Hubs and clusters of Hubs first when new development is being considered, the relationship and benefits between towns/cities in the clusters should be taken into account. The Hub and the higher performing town/city in the cluster should be considered first in the decision process.
- 2.7 The RDS is complemented by the Strategic Planning Policy Statement and Planning Policy Statements, the most relevant of which is PPS 4: Planning and Economic Development, which sets out the regional planning policies for economic development uses and indicates how growth associated with such uses can be accommodated and promoted in development plans. There are also opportunities for sustainable economic development in the countryside under PPS 21: Sustainable Development in the Countryside.

# **Strategic Planning Policy Statement (SPPS)**

- 2.8 The SPPS was published by the former Department of Environment (DOE) in September 2015. Its aim is to facilitate the economic development needs of NI in ways consistent with the protection of the environment and the principles of sustainable development. It sets the following regional policy objectives for economic development:
  - Promote sustainable economic development in an environmentally sensitive manner;
  - Tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality;
  - Sustain a vibrant rural community by supporting rural economic development of an appropriate nature and scale;
  - Support the re-use of previously developed economic development sites and buildings where they meet the needs of particular economic sectors;

- Promote mixed-use development and integration between transport, economic development and other land uses, including housing; and
- Ensure a high standard of quality and design for new economic development.
- 2.9 The SPPS states that the LDP should zone an ample supply of suitable land to meet economic development needs within the plan area over the plan period. This portfolio should offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity. Account should also be taken of factors such as:
  - Accessibility by all members of the community;
  - Connectivity with the transportation system;
  - The availability of adequate infrastructure;
  - The specialised needs of specific economic activities;
  - Potential environmental impacts; and
  - Compatibility with nearby uses.



- Land zoned as Existing Employment
- 2.10 The SPPS also states the importance of retaining economic development land and buildings that are well located and suited to such purposes so as to ensure a sufficient ongoing supply. It states that planning permission should not normally be granted for proposals that would result in the loss of land zoned for economic development use and that any decision to reallocate such zoned land to other uses ought to be made through the LDP process. It also states the same principle should apply generally to unzoned land in settlements in current economic development use (or land last used for these purposes), and offers councils flexibility to consider alternative proposals that offer community, environmental or other benefits, that are considered to outweigh the loss of land for economic development use.
- 2.11 Where appropriate, LDPs should specify the type or range of economic development uses that will be acceptable within zoned sites or broader areas designated by the Plan. The LDP may also set out restrictions as to where particular types of economic development should be located in order to meet particular Plan objectives, such as compatibility with established enterprises or adjacent land uses. Within villages and small settlements, the LDP will not normally zone land for economic development purposes, as this could inhibit flexibility. However, favourable consideration will be given to an economic development proposal where it is of a scale, nature and design appropriate to the character of the particular settlement.
- 2.12 LDPs should also have in place a system to monitor the take up and loss of land allocated for economic development purposes as well as ongoing assessment of future requirements and trends to help to identify any shortfalls that may arise or highlight the need to reallocate inappropriate or unmarketable sites for alternative uses. Land previously developed for economic development should be identified to allow the return of vacant or underused land to productive use and to create more attractive environments, reducing the need for greenfield development and with the potential to assist economic regeneration and physical renewal.
- 2.13 Opportunities for mixed use development should also be identified and include economic development uses, where this would create synergy and underpin the economic viability of the development as a whole. Key Site Requirements in the LDP should indicate the types of economic development that will be acceptable and major mixed used sites should be directed to sustainable location such locations should be served by public transport, have adequate infrastructure and capable of being integrated in terms of land use and design with the surrounding area.
- 2.14 LDPs should also normally contain a number of supporting actions that will ultimately deliver sustainable and high quality development this includes Key Site Requirements to ensure that developers provide necessary infrastructure such as road access, access for pedestrians and cyclists, water supply, sewerage and land drainage. The Plan may also provide guidance in terms of key design, layout and landscaping requirements.

# Planning Policy Statement 4 (PPS 4) - 'Planning and Economic Development'

2.15 PPS 4, published in November 2010, sets out a range of planning policies for economic development uses and indicates how growth associated with such uses can be accommodated and promoted in development plans. It seeks to facilitate and accommodate economic growth in ways compatible with social and environmental objectives and sustainable development. The policies identify opportunities and define criteria for economic development in settlement and in the countryside. The PPS also contains a policy for the retention of zoned land for economic development as well as a policy to safeguard against development that is incompatible with established or approved economic development uses.

# Planning Policy Statement 21 (PPS 21) - 'Sustainable Development in the Countryside'

2.16 PPS 21, published in June 2010 and sets out planning policies for development in the countryside, defined as land lying outside of settlement limits as designated in development plans. The PPS seeks to manage development in the countryside in a manner which strikes a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities in regard to economic development. One of the objectives of PPS 21 is to facilitate development necessary to achieve a sustainable rural economy; including appropriate farm diversification and other economic activity.

# **Supplementary Planning Guidance**

- 2.17 Supplementary planning guidance on economic development is contained in the following:
  - Supplementary Planning Guidance (SPG) to Policy PED 8 'Development Incompatible with Economic Development Uses' (October 2012).
  - Planning Advice Note 1mplementation of Planning Policy for the Retention of Zoned Land and Economic Development Uses' (November 2015).

# **Local Policy Context**

### **Legacy Area Plans**

- 2.18 The existing development or area plans that apply to Mid and East Antrim are:
  - Ballymena Area Plan 1986-2001, adopted in 1989
  - Larne Area Plan 2010, adopted in 1998
  - Carrickfergus Area Plan 2001, adopted in March 2000
- 2.19 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 PPS 4 and PPS 21.
- 2.20 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, in combination with the Planning Appeals Commission (PAC) Inquiry Report, has also been taken into account in developing the draft Plan Strategy.

# Ballymena Area Plan 1986-2001

2.21 The Ballymena Area Plan contains a section relating to 'Employment & Industry'. The plan highlighted Ballymena town as the main focus of industrial employment and referred to a considerable amount of zoned land remaining undeveloped as well as a decline in manufacturing resulting in several mills becoming vacant, with favourable consideration being given to their re-use for manufacturing, commercial and other uses. Large-scale industry was encouraged to locate to sites designated in the urban area as below:

Location	Land Zoned (Ha)	
Woodside Road	63	
Galgorm	8	
Ballymena Town Total	71	

Source: BAP 1986-2001

2.22 The Plan also stated that in all settlements, appropriate small-scale industrial uses were welcome on suitable sites but it was considered more appropriate to consider sites on merit in these settlements rather than apply prescriptive zonings. In rural areas, the Plan stated that permission would normally be given for small-scale commercial and industrial activities in existing buildings such as disused agricultural or commercial buildings or on derelict sites provided there were no amenity issues.

#### Larne Area Plan 2010

2.23 The Larne Area Plan 2010 states that large-scale industrial uses were to be accommodated in Larne town and land was allocated to ensure that sufficient sites were available to meet future needs as below:

Location	Land Zoned (Ha)	
Ballyloran	4.2	
Drumnahoe	31.7	
Larne Harbour	35.25	
Larne Town Total	71.15	

Source: LAP 2010

- 2.24 In addition, an area of 11.42 hectares was zoned at Bank Road as a mixed use development site to accommodate industrial, housing and leisure uses. The Plan also required that all industrial development was designed to a high standard and properly landscaped.
- 2.25 In Carnlough a small-scale industrial/business site (approximately 0.4 hectares) was also zoned, however this was never developed and it remains as Council-owned open space.

# Carrickfergus Area Plan 2001/draft Belfast Metropolitan Area Plan 2015 (2004) in combination with the Planning Appeals Commission Inquiry report

- 2.26 The Carrickfergus Area Plan 2001 (CAP) confirmed that industry in the Borough was concentrated in Carrickfergus town. It also advised that at this time there were 3 industrial estates: Trooperslane (held by InvestNI) and the private estates of Carrickfergus Industrial Centre and Kilroot Business Park. A number of smaller scale industrial operations were also located within the town.
- 2.27 CAP 2001 stated that the Department was keen to facilitate the development of new businesses on suitable sites and encourage the appropriate future expansion requirements of existing firms. The Plan accommodated major industrial development through the zonings in Carrickfergus town, as below:

Location	Land Zoned (Ha)	
Trooperslane Industrial Estate	21	
Kilroot Business Park	43.5	
Carrickfergus Town Total	64.5	

Source: CAP 2001

2.28 In addition, the Plan recognised that there were sites within the town which had potential to be developed for industrial purposes but which had not been zoned. CAP 2001 also stated that there may be scope for small scale enterprises to locate on appropriate sites in Greenisland and Whitehead.

2.29 Draft BMAP, Policy EMP1 allocated 166 hectares of land for employment/industrial use in Carrickfergus. This allocation comprised of existing employment land, which either was undeveloped, partially developed or developed zonings from the Carrickfergus Area Plan 2001 or other lands currently in employment use.

#### Mid and East Antrim Borough Council Corporate Plan

- 2.30 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

- 2.31 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.
- 2.32 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.
- 2.33 The key Community Plan theme of Sustainable Jobs and Tourism highlights the following:
  - Our borough has a culture of entrepreneurship, skills development and vocational training;
  - Mid and East Antrim is a leading and competitive place to start and grow business;
  - Our borough is the place to do business, developing transport, energy and superfast broadband;
  - Our borough provides opportunities for all to enable and support people to reach their full potential;
  - Our borough is a destination of choice with increased visitor numbers and spend on first-class facilities and attractions.
- 2.34 The strategic priorities of our Community Plan have 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.

# Mid and East Antrim Borough Council Integrated Economic Development Strategy 2018-2030 'Amplify'

2.35 Council's Integrated Economic Development Strategy 2018-2030 - 'Amplify' was published in 2018 and its vision is for Mid and East Antrim to become Northern Ireland's leading centre for Advanced Manufacturing and Agri-Food with recognised capabilities in Tourism, Financial and Business Services, and Digital Technologies The strategic framework it provides is intended to catalyse and guide the work of all stakeholders as they strive to grow the economy for the benefit of the area's people, businesses and communities. Amplify reflects the Council's Corporate Plan to 'Growing the Economy' and also aligns closely with the focus, drive and strategic priorities outlined in the NI Executive's draft Programme for Government and the supporting economic and industrial strategies.

- 2.36 Based on key evidence and using extensive partner consultation, Amplify will be delivered through five critical strategic economic priorities: Enterprise and Entrepreneurship; Innovation; Employment and Skills; Infrastructure and Inclusion and Wellbeing.
- 2.37 In developing the LDP for the borough, and working collaboratively with all Community Plan delivery partners, Council is now ideally positioned to lead the development process to create jobs, support the growth of new and existing businesses, develop employment and skills opportunities, secure key infrastructure investment, and initiate key development proposals in our Borough.
- 2.38 Further information on 'Amplify' can be found at <a href="https://amplifymidandeastantrim.com/about/">https://amplifymidandeastantrim.com/about/</a>. An update on 'Amplify one year on' is also contained in Appendix A of this technical supplement.

# **Cross Boundary Policy Context**

- 2.36 In developing our Economic Development Strategy and policies account has been taken of the local policy context as it relates to the emerging LDP's of our three neighbouring councils:
  - Antrim and Newtownabbey Borough Council;
  - Causeway Coast and Glens Borough Council; and
  - Mid Ulster District Council.
- 2.37 Neighbouring Councils' 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 within the Metropolitan area.

Table 2.2 Neighbouring Councils Position on Economic Development

Neighbouring Council	Position
Antrim and Newtownabbey Borough Council	ANBC published its draft Plan Strategy in June 2019.  ANBC relevant policies: Strategic Policy 2 'Employment' covers Economic Development including zoned sites and settlements, countryside, incompatible uses, agricultural development and farm diversification.  ANBC stated there was the potential for 9000 jobs over the plan period with employment land identified in Strategic Employment Locations (SELs) at Antrim, Ballyclare, Newtownabbey, Nutts Corner and Belfast International Airport, as well as Local Employment Sites (LES) — to be identified in Newtownabbey and in other towns.
Causeway Coast and Glens Borough Council	CCGBC published its POP in June 2018.  CCGBC relevant preferred options: Outline the land take up and remaining land existing. Key Issue ED1 'Economic Development, Industry and Commerce' proposes to review existing zonings and provide policy to facilitate new economic development uses outside of zoned land. Key Issue ED2 relates specifically to the Atlantic Link Enterprise Campus (Enterprise Zone).

Mid Ulster District Council	Mid Ulster published its draft Plan Strategy in February 2019.  Mid Ulster relevant policies: Economic Policies cover economic development in settlements, countryside, protection of zoned land and existing economic land, and incompatible uses. Mid Ulster also required an adequate supply of economic land for the stated 8,500 new jobs anticipated over the plan period.
	economic land for the stated 8,500 new jobs anticipated over the plan period.

- 2.38 The Council has responded to neighbouring Councils' POPs and the draft Plan Strategies for Antrim & 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. Members of the plan team have also met with officials in the three neighbouring councils during preparation of the POP and draft Plan Strategy (Summer 2019) to discuss any cross boundary issues.
- 2.39 During these discussions, no cross boundary issues in relation to economic development were raised. Also, in consideration of neighbouring Councils' development plan documents, it is the opinion of this Council that there is no conflict with our draft Plan Strategy, insofar as it relates to economic development.

# 3.0 Economic Profile

- 3.1 Economic activity, unemployment levels and income are indicators of the economic well-being of a population. This section provides an overview of the employment and economic base of the Mid and East Antrim council area within the context of the Northern Ireland economy, and examines employment sectors, unemployment and economic activity rates.
- 3.2 The Borough has a population of 138,773, which is approximately 7.4% of the Northern Ireland (NI) population. Its location close to Belfast is significant as Belfast is the main driver of the NI economy, with the city region accounting for approx. 20% of NI's population. Carrickfergus forms part of the wider Belfast Metropolitan Area. Mid and East Antrim is also home to the Port of Larne which has passenger and freight connections to Scotland, as well as being in close proximity to Northern Ireland's two main airports (Belfast International and Belfast City Airport) and Belfast Port.
- 3.3 Overall, the Borough is well served by transport links with good road and rail connections into Belfast.

  Recent upgrades to the A8, A2 and A26 have helped to improve connectivity with the city. Mid and East
  Antrim's location and its quality of connectivity (road, rail, ports and airports) needs to be exploited more
  effectively to attract people to live, work, visit and invest in the Borough.
- 3.4 There are relatively high numbers of residents in the former Council areas of Carrickfergus and Larne who travel into Belfast each day for work. In the former Carrickfergus Borough Council area, 5,100 employed residents work in Belfast (28% of the overall employed population of the area) and in the former Larne Borough Council area, 2,150 employed residents work in Belfast (15% of the overall employed population of the area). With recent improvements to transport links, there are opportunities to assist more residents to find work in the city, as well as encouraging city workers to move to Mid and East Antrim. Within the former Ballymena Council area however, there is a much more contained labour market.
- 3.5 In 2016, the economic activity rate for Mid and East Antrim was 76% above the equivalent rate of 74% for NI but below that of the UK (78%). Similarly the employment rate in the Borough (74%) in 2016 was higher than the equivalent rate for NI (69%) and more in line with that of the UK (74%).

#### **Business Base**



- 3.6 There are approximately 4,735 businesses in the Borough, which represents 7% of all businesses in NI. Some key employers include Wrightbus, Moy Park, Ciga Healthcare (based in Ballymena), Caterpillar and Terumo (based in Larne) and AES and Ryobi (based in Carrickfergus). Mid and East Antrim has existing sectoral strengths in manufacturing, engineering, and agri-food with other key employers in the energy supply and life sciences sectors.
- 3.7 Our Borough has seen a reduction in its business base in recent years, with business numbers falling by 4% over the last decade. In 2017, Mid and East Antrim had fewer business per working age population than both NI and the UK. Encouraging enterprise and increasing business registration rates is therefore a key priority of

- the Council. From 2016 to 2017, business births increased in Mid & East Antrim by 23% (this was the second highest rate in NI).
- 3.8 Recent manufacturing closures will result in the loss of approximately 2000 jobs, and between 9% and 13% of total GVA outputs (the measure of the value of goods and services produced in an area). Whilst these unfortunate circumstances have impacted adversely on the local economy, they nevertheless present an opportunity to generate a large number of new start-ups in the area to help create a more diverse, competitive and dynamic local economy.
- 3.9 The need to increase the growth of local firms is vital. Although important to continue to support the large employers that remain in the Borough, 90% of our businesses are micro (employing less than 10 people). There are strong performing businesses in our Borough and Invest NI manages a portfolio of some 200 growth-orientated firms that can access tailored support in innovation and exporting. The Council aims to create a larger pool of indigenous Small and medium-sized enterprises (SMEs) that can grow, export and create new employment opportunities in the Borough. Local partners will also have a key role in delivering this support.

#### **Employment by Sector**

- 3.10 Our Borough is over-represented in Manufacturing (21% which is nearly double the NI level of 11%), but under-represented in Information and Communication (1% vs 4%) and Professional, Scientific & Technical (2% vs 8%).
- 3.11 The manufacturing sector is a key driver of the Mid and East Antrim economy. It currently accounts for 9,173 jobs (21% of local jobs compared to 11% for NI) and 25% of GVA output. The official manufacturing statistics will have changed following the closures of JTI Gallaher and Michelin.
- 3.12 According to recent research by Manufacturing NI, it is estimated that there are around 3,560 jobs in advanced manufacturing in NI, with Mid and East Antrim being one of three Council areas where employment concentrations in the more advanced aspects of manufacturing are typically 50% higher than the NI average. Mid and East Antrim has traditionally been known as one of Northern Ireland's manufacturing heartlands, and although there have been some major recent set-backs, the skills and work ethic of the local manufacturing and engineering firms are major assets to build on further. Manufacturing firms also account for a large share of Northern Ireland exports.
- 3.13 Recognising that lower level manufacturing will continue to shift to lower-cost economies, we need to focus on higher value advanced manufacturing through a greater emphasis on innovation and collaboration. Although there is expected to be a net decrease in manufacturing (but still significant demand for replacement supply), it is expected to still account for 6,500 local jobs and 13% of the total workforce by 2030. The aim is that most of these jobs will be highly skilled and well-paid advanced manufacturing jobs. Specific initiates such as an Advanced Manufacturing Centre of Excellence, will be explored and articulated in an upcoming advanced manufacturing strategy.
- 3.14 'Wholesale and Retail Trade' is another significant local employer accounting for 9,000 jobs, and at a higher proportion of jobs in this sector than both NI and the UK. Mid and East Antrim has a lower concentration of jobs in high value sectors such as 'Information and Communication', 'Finance and Insurance' and 'Professional, Scientific and Technical' services relative to NI and the UK.
- 3.15 Over the last 20 years, Mid and East Antrim's economy has grown faster than the UK and NI, with our local economy currently worth around £2 billion in GVA (Gross Value Added) and performing well in recent years, experiencing faster annual growth relative to the rest of NI and the UK. In 2013, a quarter of total output in the local economy was attributable to the manufacturing sector more than triple the equivalent share of 8% for the UK and significantly higher than 13% in NI.

3.16 MEA has a highly productive workforce with work based productivity almost double the Northern Ireland average (£63,136 per head vs. £36,225 per head). Total GVA in Mid and East Antrim is £2.1bn (including £1.2bn in total sales from companies in MEA). This is projected to grow to a £2.8 billion economy by 2030, increasing at an annual rate of 1.9%. Although GVA is expected to grow in the coming years, this is largely expected to be job-less growth with a marginal net increase of 1% in employment predicted between 2013 and 2030. This is well below the forecast employment growth rate for the UK (12.6%) and NI (9.5%) during this period. Employment in our Borough is not expected to return to 2010 levels until 2030.



- 3.17 There are some expanding sectors in the NI economy, accompanied by a small cohort of more productive industries. There are also positive signs for our local economy, with a significant number of high value 'expanding sectors' defined as those industries which will experience growth in both GVA and employment. Examples include the 'Finance and Insurance', and 'Professional, Scientific and Technical' industries. The most significant sector expected to expand is 'Information and Communication' currently underrepresented in Mid and East Antrim with an increase in GVA of over 200% and an increase in employment of over 100% anticipated.
- 3.18 Mid and East Antrim has a small cohort of adjusting sectors, such as 'Real Estate', 'Public Administration', and 'Health and Social Work.' In particular, Manufacturing is an adjusting sector. 'Adjusting sectors' refer to those industries where productivity improvements are being realised and as such an increase in GVA and decrease in employment is expected. To minimise the overall impact of job losses from these sectors, it is important that the benefits of increased productivity are maximised.
- 3.19 The structure of the local economy of Mid and East Antrim presents a number of economic challenges, with a high proportion of enterprises in relatively low-value sectors. For example, in 2017, 29% of all active enterprises were based in agriculture higher than the equivalent rates of 25% for NI and 6% for the UK. The area also has fewer businesses involved in knowledge-based activity with just 7% of all enterprises involved in professional, scientific or technical industries, well below the UK average of 18% and below the NI figure of 8%. This suggests the need to support more high-value and technology-rich start-ups, perhaps as part of the manufacturing supply chain.
- 3.20 Agri-food is one of the most successful sectors across NI, and Mid and East Antrim has strong traditions and capabilities both in terms of agriculture, food production and food processing. Employment in food manufacturing is part of the total 9,173 manufacturing jobs in the Borough and includes Moy Park, based in Ballymena, which is one of the area's key employers. There are recognised opportunities for sector growth. With a growing global focus on food quality, safety and provenance, Mid and East Antrim is well placed to develop as a leading centre of excellence. The Agri-food Strategy Board predicts an annual jobs growth of 3-4% in NI and major increases in GVA. With high levels of exporting, both advanced manufacturing and agri-food are important sectors as NI continues to try to re-balance the regional economy. Specific opportunities will be explored and articulated in an upcoming NI Agri-food strategy.
- 3.21 In relation to Digital and ICT, the Borough only has around 300 ICT jobs. However, the new innovation facility developed at the Ecos Centre in Ballymena will be important in creating potential for more technology jobs in the future. There are opportunities for sector growth in software engineering, data analytics, networks and sensors and cyber security. Although there is no university campus in the Borough,

there are opportunities to position Mid and East Antrim as a key location for new jobs in this growing sector within the wider Belfast City region.

#### Skills Base

- 3.22 It is anticipated that future economic growth will move towards more exportable service sectors and if Mid and East Antrim is to follow this trend it will have to supply a suitably skilled and qualified workforce. Education has an important role to play in promoting economic well-being. Better education improves access to employment opportunities, raises productivity and innovation. In addition, it plays a very crucial role in securing economic and social progress and improving income distribution.
- 3.23 Labour market participation in the Borough is higher than NI as a whole but a gap remains with the UK. Our local population is well engaged in the labour market, with slightly higher employment and activity rates compared to NI as a whole.
- 3.24 Mid and East Antrim has a skilled and motivated workforce, but with potential to improve in regard to higher-level skills. The latest (2016) data shows that 13% of our working age population have no qualifications, less than that of the NI figure 16%, however above the UK figure of 9%. Conversely, 30% of our working age population has an NVQ Level 4 or above qualification, compared to 31% in NI and 36% in the UK.

# **Small Business Enterprise Centres**

- 3.25 A lot of the existing accommodation for small businesses is managed by the three Enterprise Agencies in the Borough. Ballymena Business Centre has over 100 units around 100,000sq.ft of workspace and office space across five sites around Ballymena and is 95% occupied. Carrickfergus Enterprise has 54,000 sq. of workspace and office space and is 100% occupied. LEDCOM in Larne has around 100,000 sq. of workspace across it's Willowbank Business Park with 90% occupancy and LEDCOM Industrial Estate with 80% occupancy.
- 3.26 New business accommodation of around 20,000 sq.ft is now available at The Innovation Centre at Ecos, Ballymena. The facility provides 'science park-styled' shared and private workspaces with meeting space and business support. Stakeholder feedback has indicated that more small business space for both start-ups and established firms is required.
- 3.27 This is also evident from the high occupancy rates and hence little space capacity in the existing enterprise centres.

# 4.0 Survey Work and Studies informing the Evidence Base for Economic Development

- 4.1 A series of surveys and studies were carried out to inform the evidence base for the Local Development Plan (LDP). These consisted primarily of the following:
  - Industrial and Economic Development Land Monitor Report 2018
  - Mid and East Antrim Availability and Supply Report
  - Assessing Employment Space Requirements across the MEA Council 2017-2030

# **Industrial and Economic Development Land Monitor Report 2018**

- 4.2 This Monitor Report, the first to be produced by the Council's LDP team, relates to the availability of land for industrial and economic development in the main settlements across the Borough. In terms of the data presented in the Report, survey work was undertaken in November 2017 by the LDP Team for each of the monitored sites and recorded in the Industrial and Economic Land Monitor Database. This report is available on the Council LDP website and will be updated every 2 years.
- 4.3 The Monitor provides an up to date evidence baseline which can be added to and updated in subsequent years using planning decision data and further survey work. Whilst the monitor itself did not interpret the information gathered, it helped form part of the evidence base for the draft Plan Strategy Economic Development Strategy. It will also enable the Council to monitor the uptake of industrial and economic development land across the Borough, and will be used to inform decisions on zoning for economic development growth at Local Policies Plan stage.
- 4.4 The Monitor has also improved our knowledge and intelligence of our local businesses to help support future industrial and economic development. It will also enable us to analyse use trends and assess the ongoing suitability and viability of these areas for different types of employment provision, as well as helping to analyse vacancy and market activity as a further barometer of economic performance.
- 4.5 The survey in November 2017 was based on each of the 3 extant plans at the time the Ballymena Area Plan, The Larne Area Plan and BMAP<sup>1</sup>. All land zoned for industrial/employment/economic development use was surveyed. The total undeveloped industrial zoned land in the Council area at the time of the Monitor was approximately 156 Ha, broken down within the 3 main towns as shown in the tables below:

Table 4.1 Ballymena zoned land surveyed

Ballymena (Zoned)

Total Area Identified

73.06

Developed Iand within zonings

Undeveloped Iand within zonings

Land under construction for Industrial Use (as of Nov 2017)

Other Iand within zonings

7.07 [1]

Other Iand within zonings

Tilincludes access roads, communal landscaping and areas of constraint (rivers etc.)

<sup>1</sup> 

<sup>&</sup>lt;sup>1</sup> The original survey work in 2017 was based on the adopted BMAP at that time. However, the Local Policy Context section in this document and para 2.2.3 in the draft Plan Strategy 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. It is now acknowledged that the Carrickfergus Area Plan 2001 remains the extant statutory plan for this area. This plan, along with the draft BMAP (2004) as the most recent expression of local planning policy, in combination with the Planning Appeals Commission (PAC) Inquiry Report, has also been taken into account in developing the draft Plan Strategy. Future survey work will be based on these plans instead.

Table 4.2 Larne zoned land surveyed

Larne (Zoned)	Gross Area (hectares)	
Total Area Identified	81.3	
Developed land within zonings	24.1	
Undeveloped land within zonings	46.1	
Land under construction for Industrial Use (as of Nov 2017)	0.0	
Other land within zonings	11.2[1]	

[4]Includes access roads, communal landscaping and areas of constraint (rivers etc.)

Table 4.3 Carrickfergus zoned land surveyed

Carrickfergus (Zoned)	Gross Area (hectares)	
Total Area Identified	151.50	
Developed land within zonings	67.20	
Undeveloped land within zonings	75.40	
Land under construction for Industrial Use (as of Nov 2017)	0.00	
Other land within zonings	8.90[1]	

[4] Includes access roads, communal landscaping and areas of constraint (rivers etc.)

- 4.6 The SPPS (para 6.92) requires the LDP to ensure there is an ample supply of suitable land available to meet the economic development needs with the Plan area. From this monitor, it is concluded that all three main towns have an ample supply of land for economic development purposes.
- 4.7 The SPPS also states that LDPs should zone sufficient land for economic development which offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity. From this monitor, it is concluded that both Carrickfergus and Larne have the required range and choice of sites. However it is considered that Ballymena which only has undeveloped zoned land remaining in the north-eastern sector of the town, will require further land to be zoned in order to fulfil the SPPS requirement to offer a range and choice of sites. This is reflected in the Strategic Allocation of Land for Economic Development contained in the draft Plan Strategy.
- In addition to this zoned land, other unzoned sites currently/last used for industrial or economic development purposes and greater than 0.5ha were also monitored as it is recognised within the draft Plan Strategy that these will also contribute to the supply of economic development land in the Borough. It is also noted that the SPPS supports the re-use of previously developed industrial/business sites for economic development use.
- 4.9 Other points to note from the Monitor include:
  - there is a 12% vacancy rate within zoned land which has been developed, which equates to a 15% floorspace vacancy;
  - 12% of site area within developed zoned land has been developed for Sui Generis uses which equates to 7% of floorspace developed;
  - approx. 8% of developed site area and 5% of floorspace on zoned land across the Borough is currently being used for uses within the A, C and D Use Classes resulting in economic land being lost to non-industrial uses, something which PPS 4 seeks to prevent.
- 4.10 For more information on the survey of industrial and economic development land, please see the full 2018 Monitor Report contained in Appendix B of this Technical Supplement.

# Mid and East Antrim Availability and Supply Report (CBRE)

- 4.11 To inform Stage 1 (Taking Stock of the Existing Situation) of the RDS Employment Land Evaluation Framework (ELEF), CBRE were appointed to complete an audit of existing workspace availability throughout the Borough, including the Business Enterprise Centres.
- 4.12 This report found that:
  - The majority of available office space within the Borough is situated within the town centres, above retail units on the high street. Most of this space is Grade B/C space.
  - Each of the Enterprise Centres are fit for purpose and provide much-needed space and support for startup business although some tenants have been in occupation for very long periods of time.
  - CBRE also reviewed the current industrial stock in each of the three main towns taking consideration of
    the current industrial availability, vacancy levels, demand, location and quality of accommodation, and
    provided comment on the suitability of industrial land which remains undeveloped. Whilst the report
    stated many positives about the existing stock of zoned land, it highlighted that some zonings may offer
    limited attractiveness for modern industry and business and may potentially be more suited for
    alternative uses.
  - CBRE recommended that there is no need for further investment in industrial business space across the borough.
- 4.13 The Report included the following recommendations:
  - Provide more start up and grow on space
  - Incentivise tenants to move on from Enterprise Centres to larger 'grow-on' space
  - Utilise existing buildings
  - Consider ways to provide flexible offices
  - Develop relationships with Landlords/Agents of existing Business Parks
  - Produce a Council Asset Schedule
- 4.14 The full CBRE Report is contained in Appendix C of this Technical Supplement.

# Assessing Employment Space Requirements across the MEA Council 2017-2030 (UUEPC)

- 4.15 Under the Strategic Planning Policy Statement (SPPS) a fundamental role for the LDP is to ensure that there is an ample supply of suitable land available to meet economic development needs within the Plan area. Ulster University Economic Policy Centre (UUEPC) were appointed to complete a report to assist in informing Stage 2 (Understanding Future Requirements) of the RDS ELEF by providing an overview of employment change and also some projections of future employment space requirements based on current employment growth forecasts for the Borough over the Plan period to 2030.
- 4.16 The report found that:
  - Mid and East Antrim may gain an additional 768 to 4,122 jobs by 2030 (dependant on varying economic scenarios).
  - Positive outlook in regard to the need for additional employment space in the following categories:
    - Additional 5,871sq. metres of small business workspace needed in the Borough between 2017 and 2030;
    - Additional 19,531sq. metres of general office space needed in the Borough between 2017 and 2030.
- 4.17 The full UUEPC Report is contained in Appendix D of this Technical Supplement.

# **5.0** Preferred Options Paper

- 5.1 Council published its Preferred Options Paper (POP) in June 2017. The main purpose of the POP was to inform the next stage in the LDP process, the draft Plan Strategy.
- 5.2 Building on the emerging evidence base<sup>2</sup>, 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. Three of these Key Issues related to economic development. 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 Key Issue 6 of the POP put forward a Preferred Option to allow Class B1 Business Uses in town centres, district centres or local centres and within economic development zonings as part of a sequential approach. Our alternative options were to:
  - restrict Class B1 Business uses to town centres only;
  - only allow such development in town centres and district and local centres that may be brought forward;
  - allow such development anywhere within settlement limits where a need can be demonstrated.
- 5.5 The majority (67%) of public responses supported the preferred option and the statutory consultees also broadly welcomed this approach.
  - Some respondents thought there should be more flexibility for the B1 Business Uses whilst others suggested the approach should be more town centre and sustainable travel focused.
  - Dfl stated that the preferred option was broadly in line with the SPPS which provides some flexibility for councils to specify 'other locations' for such development, however they questioned the inclusion of economic development zonings.
  - NIHE saw the preferred option as a way of providing additional opportunities to enhance vitality and viability of town centres.
- The policy wording has now been amended to direct business uses within a town centre and in other locations specified for such in the LDP. Those other locations will be specified through key site requirements, which may restrict or promote specific economic development uses on zoned sites or broader areas of economic development within towns where there are good planning reasons for doing so.
- 5.7 Key Issue 7 of the POP put forward a Preferred Option to provide for start-up and grow-on business space within economic development land/zonings by identifying land to be used specifically for start-up and grow-on business space, and utilise redundant buildings or land last used for economic development within settlements. Our alternative options were to:
  - only use redundant buildings or land last use for economic development; or
  - only provide this type of business space within economic development land/zonings; or
  - tailor policy to enable a more flexible approach in the countryside.
- 5.8 The majority (67%) of public responses supported the preferred option and the statutory consultees were also broadly supportive of this approach.
  - Some respondents expressed caution about being too prescriptive in zoning specifically for business start-ups which could prove counter-productive and limit choice etc.

<sup>&</sup>lt;sup>2</sup> 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.

- Invest NI and others agreed that a flexible approach is needed.
- Respondents agreed that the re-use of vacant or underused sites was a positive.
- 5.9 The economic development policies in the draft Plan Strategy offer flexibility for various economic development uses, support the re-use of land last used for economic development purposes, and provides opportunities for business start-ups and enterprise projects. It will not be until LPP stage that further consideration is given to zoning sites, or parts of sites specifically for business start-ups.
- 5.10 Key Issue 8 of the POP put forward a Preferred Option to allow alternative compatible economic uses/business falling outside Part B 'Industrial and Business Uses' (of the Planning (Use Classes) Order (NI) 2015) within zoned economic development land. This would include uses for the sale or display of motor vehicles; as a scrapyard; or a yard for the storage or distribution of minerals; or the breaking of motor vehicles.

Our alternative options were:

- to safeguard land zoned for economic development use for industrial, business and storage and distribution uses only (defined in Part B of the Planning (Use Classes) Order); or
- allow retail, commercial and other alternative uses falling outside Part B within economic development zonings.
- 5.11 58% of respondents broadly supported the preferred option, whilst half of the statutory consultees supported it.
  - Respondents expressed caution in prescribing which sui-generis uses could be permitted as these are
    often the more contentious uses which could impact on/conflict with existing businesses and may also
    make zoned sites less attractive.
  - Dfl stated that alternative uses should not be applied universally on all economic land but instead appropriate individual zonings should be specified for such uses.
  - NIHE and others welcomed that retailing would not be acceptable on zoned land.
- 5.12 In addition to these key issues, the POP included a review of the existing PPS 4 and PPS 21 policies relating to economic development and made recommendations as to whether to bring these polices forward with or without amendments (see Appendix E). The public/consultees were also asked for their opinion on any proposed policy changes.
- 5.13 For full details of the responses to the preferred approach to tourism refer to the POP Public Consultation Report November 2017, available on the Council's LDP website.

# 6.0 Consultee and Councillor Engagement

- 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.
- The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Department for Infrastructure (Dfl). 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 Economic Development Strategy and policies were discussed at the Councillor workshops held on 11 December 2018, and again on 14 March 2019. They were also presented at the Project Management Team meeting held on 16 January 2019. At both Councillor workshops there were various views expressed by members with a position agreed at the second workshop and wording amended to reflect this. Following comments from NIHE, HED and Invest NI after the Project Management Team meeting, minor amendments were also made to the policy wording and Justification & Amplification text (see Appendix E).

# 7.0 Draft Plan Strategy Policy Approach

- Planning for economic development is one of the core functions of the LDP because of the Council's strategic priority to grow the local economy. However, this needs to be done in a sustainable manner, as required by the SPPS, which seeks to "facilitate economic needs in ways consistent with the protection of the environment and the principles of sustainable development. Accordingly, the overall approach of the draft Plan Strategy is to promote and facilitate sustainable economic development.
- 7.2 Within this context it is possible to distinguish three main strands to the policy approach embedded within the draft Plan Strategy, as follows:
  - To meet the land use needs for economic development over the Plan period, through the strategy for the allocation of such land;
  - To ensure that land identified for economic development use in settlements is reserved to meet future needs and remains fit for purpose, through policies that will facilitate good decision making through the development management system;
  - To support rural economic development of an appropriate nature and scale, through policies that identify suitable opportunities for rural enterprise and facilitate good decision making through the development management system.
- 7.3 The draft Plan Strategy strategic proposals and policies relating to economic development are the outworking of the approach outlined above. The remainder of this section recaps on the supporting evidence base for these proposals and policies. Much of this evidence is derived from the survey work and studies listed under Section 4.0 of this technical supplement. In addition, evidence is drawn from the POP and responses to it in regards to selected key issues and the policy review as it relates to economic development.

# Strategic Allocation of Land for Economic Development

- 7.4 The draft Plan Strategy Strategic Allocation of Land for Economic Development is set out in Strategic Proposal SGS6 of the document. It represents the outworking of that element of the approach referred to previously which seeks "to meet the land use needs for economic development over the plan period, through the strategy for the allocation of such land."
- 7.5 The broad methodology underpinning the proposed allocation is the RDS Employment Land Evaluation Framework (ELEF) set out in Table 2.1 of Section 2.
- 7.6 Stage 1 of this methodology includes "Taking stock of the existing situation." In addressing this, particular account has been taken of the following aspects of the evidence base presented in this technical supplement.
  - The RDS direction to grow the main hubs and to identify them as the focus for economic growth.

    Ballymena, Carrickfergus and Larne are the major urban centres in Mid and East Antrim and are clearly distinguished from all other settlements in terms of their population size, economic base and employment, and the infrastructure necessary to support future economic growth. Rather all the second tier small towns designated in the draft Plan Strategy are all located in relatively close proximity to the larger centres, meaning that they are all likely to benefit from the concentration of economic growth in the nearest Main Town.
    - The existing supply of land for economic development

      In 'taking stock of the existing situation', considerable weight has been attached to the fact that the three main towns are the locations where land is currently zoned through existing Area Plans (refer to paragraphs 2.21 2.29). Much of this land remains undeveloped, as shown by Tables 4.1 4.3, based on our most recent Industrial Monitor. The CBRE report (refer to Section 4.0, paragraphs 4.11 4.14) also confirmed that in general this zoned reserve remains 'fit for purpose', albeit that there appears to be limited need for its development over the plan period.

The allocation to each Main Town under SGS6 is therefore primarily based on their existing supply of zoned undeveloped land, with the exception of Ballymena where there is considered to be insufficient choice offered by currently zoned land in regard to its location.

#### Assessment of Individual sites

Stage 1 of the ELEF also requires an assessment of "the 'best' employment sites to be retained and protected and the identification of sites that should clearly be released for other uses." Whilst the evidence has been collected, this aspect of Stage 1 of the ELEF is clearly site specific in nature. Accordingly, the approach of the LDP is to deal with this matter at Local Policies Plan stage.

- 7.7 Taking account of the evidence base and its application as described above, it is considered that Stage 1 of the ELEF has been undertaken in a 'sound' manner and progressed as far as is appropriate at this stage of the Plan process.
- 7.8 Stage 2 of the ELEF methodology involves "Understanding Future Requirements." In addressing this, particular account has been taken of the following aspects of the evidence base presented in this Technical Supplement.
  - Assessment of employment space requirement

The assessment of employment space requirements was carried out on behalf of Council by UUPEC. The main findings of the Report are set out in Section 4.0, para 4.16. Here, it is noted that only a modest amount of floorspace is needed for small business workspace and for general office space. As the thrust of the draft Plan Strategy is to direct new offices to town centres, this means that the supply of undeveloped zoned land previously referred to is well in excess of any requirement likely to be generated by the need for small business workspace.

- Consideration of economic priorities and anticipated trends
  - "Understanding future requirements" has also been informed by consideration of economic priorities and anticipated trends. The UUPEC forecast is for the creation of between 768 and 4122 jobs over the Plan period, depending on differing economic climates. However, other evidence flowing from 'Amplify' and ManufacturingNI as referred to in this Report would suggest that job creation is more likely to be at the lower end of the UUPEC spectrum. This is because the emerging priority sectors in Mid and East Antrim are likely to further economic growth through productivity (GVA) and export potential rather than through large scale employment provision.
- 7.9 Taking account of the evidence base and its allocation as described above, it is considered that Stage 2 of the ELEF has been undertaken in a 'sound' manner. The general conclusion in that there is a generous supply of land suitable for economic development currently available, with a sufficient choice and range in terms of quality, except for the circumstances pertaining to Ballymena, as previously referred to.
- 7.10 Stage 3 of the ELEF methodology involves "Identifying a 'new' portfolio of sites." As previously mentioned this is appropriate for the Local Policies Plan stage of the LDP and will be addressed at that stage.

# **Strategic Subject Policies**

# Policies for the Protection and Development of Economic Development Land

7.11 The draft Plan Strategy contains strategic subject policies for economic development in settlements to ensure that land identified for this purpose remains available for future needs and that established or approved enterprises remain viable through being protected from incompatible development.

# Policy ECD2 Retention of Economic Development Land

7.12 The draft Plan Strategy contains a strategic subject policy to protect for zoned economic development as well as unzoned land within settlements currently or last used for economic development.

- 7.13 The evidence informing this policy is largely derived from the regional direction set out in the SPPS and PPS 4 as referred to in Section 2 of this document.
- 7.14 In addition, para 4.9 of this document referred to the pressure on zoned economic land from uses within the A, C and D Use Classes in particular retail, professional services, and leisure uses. This has resulted in approx. 8% of developed zoned economic land being lost to non-industrial/B Class business uses, something which planning policy sought to prevent.
- 7.15 The policy therefore seeks to protect zoned land from inappropriate uses, whilst offering more flexibility within unzoned lands currently or last used for economic development purposes. This will assist in protecting zoned land required for the emerging sectors and encouraging start-up and grow on business space opportunities (as referred to in Key Issue 7 of the POP and referenced in para 5.7 of this document).

# Policy ECD3 Development Incompatible with Economic Development Uses

- 7.16 The draft Plan Strategy contains a strategic subject policy to ensure that existing/operating or approved economic development uses will not be jeopardised by incompatible development.
- 7.17 The evidence informing this policy is largely derived from the regional direction set out in the SPPS and PPS 4 as referred to in Section 2 of this document. Key Issue 8 of the POP (referenced in paras 5.10 and 5.11 of this document) also addressed this as a key issue.

#### **Policies for Supporting Rural Economic Development**

- 7.18 The third strand of the draft Plan Strategy policy approach to economic development is to make provision for appropriate forms of economic development in the countryside. The outworking of this strand is Policy ECD 4 Economic Development in the Countryside
- 7.19 The evidence informing this policy is largely derived from the regional direction set out in the RDS, SPPS, PPS 4 and PPS 21, all of which is referred to in Section 2 of this document.
- 7.20 Whilst the POP did not address rural economic development directly as a key issue, it was touched upon in the specific context of provision for start-up and grow-on business space and also in regard as to whether some opportunities provided under existing policies in PPS 21 are sufficient.
- 7.21 Appendix E of this technical supplement explains how all the economic development policies, including those for the countryside, have evolved through the outworking of the LDP process to date. A rational is provided where amendments have been made to the existing policies as a result of responses to the POP and/or engagement with Consultees and Elected Members.

# 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 approach insofar as it relates to the strategic allocation of land for economic development and the economic development strategic subject policies is regarded as sound, because it meets the various tests of soundness as summarised below:

Table 8.1 Consideration of Soundness

Procedu	ural Tests
P2	The economic development policies as proposed in ECD1 - ECD4 have evolved from the POP and POP Public Consultation Report as described in Chapter 4 of this document.
Р3	The economic development strategy and economic development subject policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consiste	ency Test
C1	The economic development policies have taken account of the RDS, in particular, RG1 Ensure adequate supply of land to facilitate sustainable economic growth; SFG10 Identify and consolidate the roles and functions of settlements within the clusters; SFG11 Promote economic development opportunities at Hubs; and SFG13 Sustain rural communities living in smaller settlements and the open countryside. (refer to paras 2.3 and 2.6 of this document)
C2	The economic development policies have taken account of our Community Plan, particularly in relation to the themes of Sustainable Jobs and Tourism, and also Protecting Our Environment. (refer to paras 2.31 – 2.34 of this document)
C3	The economic development policies have taken account of the SPPS, particularly paragraphs 2.8 – 2.14 relating to economic development. Account has been taken of PPS 4 and PPS 21, and supplementary planning guidance as detailed in paras. 2.15 - 2.17 of this document.
C4	The economic development policies have taken appropriate account of the existing development plans relevant to Mid and East Antrim, whilst noting the longevity of these plans. They have also taken account of Council strategies and studies within Mid and East Antrim pertaining to economic development. Refer to paras 2.18 – 2.29 of this document.
Coherei	nce and the effectiveness tests
CE1	The economic development strategy and economic development subject policies have taken account of the Development Plan documents of our three neighbouring Councils, who have also been consulted in their capacity as statutory consultees.
CE2	The economic development proposals and policies are founded on a robust evidence base, and has taken account of comments from the POP consultation and subsequent engagement with statutory consultees and Invest NI.
CE3	The Monitoring Framework within Technical Supplement 1 (indicators 2, 3, 13 & 18) detail how economic development will be monitored throughout the borough.
CE4	The strategic allocation of land for economic development and any refinements at Local Polices Plan stage will be reviewed at Plan Review stage with potential for the re-designation of economic development land to take account of changing circumstances. Economic development policies will also be reviewed to assess whether they are achieving their intended aims.

# **APPENDICES**



Midb East Antrim

Amplify

sector to help map the sector's future success.

The economic fightback is well and truly on in ou

We have a clearyision and

APPENDIX B Industrial and Economic Land Monitor Report 2018 (see separate document)

**APPENDIX C** Assessing Employment Space Requirements across Mid and East Antrim (CBRE) (see separate document)

APPENDIX D Mid and East Antrim Availability and Supply Report (UUEPC) (see separate document)

**Current Operational Policy** 

Strategic Planning Policy Statement

#### **PPS 1: General Principles**

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.

#### **SPPS**

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.

# POP

#### Recommendation/Comment

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.

# POP Responses and Post Consultation Consideration

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.

#### **Final Wording for Draft 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.

PPS 4: Planning and Economic Development	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration (see Chapter 6)	Final Wording for Draft Plan Strategy
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 development within the main hubs, and for B1 uses more specifically within town centres.	SPPS generally accords with Policy PED 1 and states that Class B1 business uses in larger settlements should be permitted within town centres or in other areas specified for such use in the LDP (para 6.85).	Policy PED 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.  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.  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 Class B1 investors.  Translink raised concerns regarding including economic zonings in the sequential approach due to their poorer accessibility, relative to town centres.  Dfl Planning also requested clarification on rationale for including economic zonings.  Post consultation consideration  Discuss further with Dfl Planning before bringing forward POP recommendation.	Policy ECD1: Economic Development in Settlements  The wording of PED 1 has been carried forward with some changes. Policy simplified in relation to classes of business use. All Industrial uses now permitted on land zoned for such purposes or in an existing industrial area. In lower tier settlements, criteria to be applied to ensure proposal is appropriate for that settlement.  Councillor & PMT Comments  No changes further to Councillor feedback. Minor changes to policy wording following comments from PMT to clarify that all criteria under 'business use' must be met.
Policy PED 2: Economic Development in the Countryside  This is a directional policy that signposts other policies in the PPS which provide opportunity for economic development in the countryside.  This policy also outlines that any economic development associated with farm diversification schemes and proposals involving the re-use of rural buildings will be assessed under the provisions of PPS 21 'Sustainable Development in the Countryside'. All other proposals for economic development in the countryside will only be permitted	SPPS (para 6.87) accords with Policy PED 2.	As a directional policy, Policy PED 2 does not need to be amended.  It is recommended that the wording of Policy PED 2 is brought forward in the LDP Plan Strategy.	No comments received from statutory consultees to this policy, however some public respondents stated the need to be more flexible in relation to start-up and grow-on business developments associated with agri-food production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in situ.  Others stated there should be a relaxation of planning policy in the countryside for small businesses.  Post consultation consideration While, it is considered there remains sufficient opportunities for	Policy ECD4 Economic Development in the Countryside  Policy combines PED 2 – PED 6 of PPS 4 and CTY 4, 11 and 12 of PPS 21 into one all-encompassing rural economic policy. Thrust of existing policies brought forward into new Policy wording. Minor wording changes such as 'appropriate' sui generis employment use inserted into previous PED 4. Given rural nature of our Borough, a flexible approach is proposed to ensure adequate provision is made for appropriate proposals that cannot be accommodated within a settlement. Policy also provides opportunities for farm/forestry diversification and agricultural/forestry development as well as conversion of an existing building for economic use as previous.

in exceptional circumstances.			appropriate economic development in the countryside as outlined in the SPPS, this policy will be further considered in light of Council's emerging Integrated Economic Development Strategy.	Councillor & PMT Comments No changes further to above consultations.
Policy PED 3: Expansion of an Established Economic Development Use in the Countryside  States that proposals for the expansion of an Established Economic Development Use in the Countryside will be permitted where it does not harm the rural character of the area and there is no major increase in the site area of the enterprise.  Proposals for extension will normally be expected to reuse or extend existing buildings on site. Where it is demonstrated that this is not possible, new buildings may be permitted provided they are in proportion and integrate as part of the overall development.  Exceptional circumstances are also outlined including where the proposal would make a significant contribution to local economy, or where relocation is not operationally possible.	SPPS is less detailed than Policy PED 3 in the criteria to be adhered to, however, it generally accords with Policy PED 3.  SPPS (para 6.87) supports rural economic development of an appropriate nature and scale and states that farm diversification, the re-use of rural buildings, and appropriate redevelopment and expansion proposals for industrial and business purposes normally offer the greatest scope for sustainable economic development in the countryside.	Policy PED 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.  It is recommended that the wording of Policy PED 3 is brought forward in the LDP Plan Strategy.	No comments received from statutory consultees to this policy, however some public respondents stated the need to be more flexible in relation to start-up and grow-on business developments associated with agri-food production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in situ.  Others stated there should be a relaxation of planning policy in the countryside for small businesses.  Post consultation consideration  While, it is considered there remains sufficient opportunities for appropriate economic development in the countryside as outlined in the SPPS, this policy will be further considered in light of Council's emerging Integrated Economic Development Strategy.	Policy subsumed under new policy ECD4: Economic Development in the Countryside (see above) Policy wording brought forward from PED 3 with minor changes.
Policy PED 4: Redevelopment of an Established Economic Development Use in the Countryside  Sets out criteria for the redevelopment of an established economic development use in the countryside for industrial or business purposes.  It also includes criteria relating to storage and distribution uses.  This policy also facilitates proposals for the redevelopment of rural	SPPS is less detailed than Policy PED 4, however, the thrust of the SPPS accords with Policy PED 4.	Policy PED 4 appears to be working well and there is no evidence to suggest that it needs to be amended.  It is recommended that the wording of Policy PED 4 is brought forward in the LDP Plan Strategy.	No comments received from statutory consultees or public respondents to this policy.  Post consultation consideration Bring forward POP recommendation	Policy subsumed under new policy <b>ECD4: Economic Development in the Countryside</b> (see above). Policy wording brought forward from PED 5 with minor changes.

economic development sites for tourism, outdoor sport and recreation or local community facilities where the policy criteria can be met and where the proposal does not involve land forming all or a substantial part of an existing industrial estate.				
The policy also notes that retail will not be permitted.				
Exceptionally proposals for social and affordable housing may be permitted on former industrial sites that cannot realistically be redeveloped for industry, provided they meet the policy provisions of PPS 21.				
Policy PED 5: Major Industrial Development in the Countryside	SPPS is less detailed than Policy PED 5, however it accords with it.	Policy PED 5 appears to be working well and there is no evidence to suggest that	No comments received from statutory consultees or public	Policy subsumed under new policy <b>ECD4: Economic Development in the Countryside</b> (see
Sets out criteria for Major Industrial Development proposals in the Countryside, which make a significant contribution to the regional economy. The policy also suggests that edge of town locations will be favoured over a location elsewhere in the rural area.	SPPS (para 6.88) also favours an edge of settlement location where there is no suitable site within the settlement; or where a major or regionally significant proposal is required to be in the countryside.	it needs to be amended.  It is recommended that the wording of Policy PED 5 is brought forward in the LDP Plan Strategy.	respondents to this policy.  Post consultation consideration  Bring forward POP recommendation.	above). Policy wording brought forward from PED 6 with minor changes.
<b>Policy PED 6: Small Rural Projects</b> Sets out criteria based policy for a	SPPS is less detailed than Policy PED 6, however it accords with Policy PED 6.	Policy PED 6 appears to be working well and there is no evidence to suggest that it needs to be amended.	No comments received from statutory consultees or public respondents to this policy.	Policy subsumed under new policy <b>ECD4: Economic Development in the Countryside</b> (see above). Policy wording brought forward from PED 6 with minor changes.
small community enterprise park/centre or a small rural industrial enterprise on land outside a village or smaller rural settlement.		It is recommended that the wording of Policy PED 6 is brought forward in the LDP Plan Strategy.	Post consultation consideration Bring forward POP recommendation.	
Subsequent proposals should be sited to cluster or visually link to this, subject to amenity and environmental considerations.  Policy states that storage or distribution uses will only be permitted where these are clearly ancillary to a proposal for a community enterprise park/centre or an industrial use.				

# Policy PED 7: Retention of Zoned Land and Economic Development Uses

Sets out a general presumption against the loss of land for economic development, unless the land has been substantially developed for alternative uses.

The policy also provides for 'sui generis' employment uses within zonings, subject to these being compatible with the predominant use and to other normal planning considerations. Retailing and commercial leisure development is specifically excluded, except where ancillary to the economic development use.

The policy also applies the same general presumption to unzoned land in economic development use in settlements (or land last used for this purpose) as detailed in a subsequent clarification to the policy. The policy sets out a list of detailed criteria to be met before a proposal for an alternative use on such land can be permitted and there is also provision for compatible 'sui generis' uses.

The Department issued further guidance on the implementation of this policy in November 2015 which largely reflects the policy position of the SPPS (column 2 refers).

#### Clarification of Policy PED 7: Retention of Zoned Land and Economic Development Uses (2011)

This clarified that even if zoned or unzoned economic development land is cleared, the presumption for future economic development use remains. SPPS confirms the presumption set out in PPS 4 against the loss of economic development land for alternative uses (para 6.89).

In the case of zoned land, the only provision for alternative use is when a developer can clearly demonstrate how the special circumstances of a particular case outweigh the preferred option of retaining land for economic development use.

In the case of unzoned land in economic development use (or last used for these purposes), neither the guidance nor the SPPS repeats the detailed criteria set out in Policy PED 7 of PPS 4. Instead it provides planning authorities with the flexibility to consider alternative proposals that offer community, environmental or other benefits that are considered to outweigh the loss of land for economic development use.

There are no specific references to 'sui generis' uses or to the exclusion of retailing and commercial leisure development.

SPPS (para 6.89) reiterates the importance that land last used for economic development purposes should be retained for economic development use.

Policy PED 7 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

However, it is recommended that the policy is amended to align more closely with SPPS and that the detailed criteria relating to unzoned land be removed and included as policy guidance.

Further to Key Issue 8, it is proposed subject to the outcome of public consultation to make provision, by way of exception, for compatible 'sui generis' uses on economic development land and to state what these uses would include.

It is also recommended to reiterate the Policy PED 7 presumption against retail and commercial leisure development.

General support for Council's suggested amendments to the policy approach to PED 7.

NIHE suggest that under any revised policy consideration should be given to the provision of social housing and the substantial community benefit that outweighs the loss of economic land.

Dfl Planning outlined its concerns with compatibility of the proposed uses such as 'sale and display for sale of motor vehicles' and 'a scrap yard, or a yard for the storage or distribution of minerals or the breaking of motor vehicles' and advised that the Council ensure that all the factors set out in the SPPS have been taken into account

Invest NI is generally opposed to the loss of land either currently or last used for industrial development. They cite concerns that in removing the existing criteria and including it as guidance this would lead to a weakening in policy protection.

Some public respondents also suggested that the amendments proposed to PED 7 are too restrictive in relation to retail and commercial leisure development and would be unsustainable for future development of certain sites.

Others urged caution on mentioning specific sui generis uses such as car sales as this could be interpreted as allowance for retail development, generally.

#### Post consultation consideration

Discuss further with Dfl Planning and other key consultees before considering whether to bring forward POP recommendation or not.

# Policy ECD2: Retention of Economic Development Land

Policy wording largely brought forward with amendments. Exception permitted for sui generis use within zoned land provided all listed criteria are met. Criteria for un-zoned land in settlements shortened to 3 criteria, 1 or more of which must be met. Includes flexibility for 'compatible' sui generis uses, also requires active marketing evidence to prove unsuitability.

#### **Councillor & PMT Comments**

Councillors requested KSRs at LPP stage to zone sites for alternative sui generis uses (on selected sites or part thereof) and in the meantime align new Policy more closely with existing PED 7 of PPS 4 than previously proposed. Amendments made to Policy wording further to HED's comments regarding imbalance between social, environmental and economy benefits of a specific mixed-use regeneration initiative. Minor changes to wording of J&A following PMT comments

#### Policy PED 8: Development incompatible with Economic **Development Uses**

Ensures that development in the vicinity of an existing or approved economic development use that would be incompatible with this use or that would prejudice its future operation will be refused.

SPPS (para 6.90) accords with Policy PED

Policy PED 8 appears to be working well and there is no evidence to suggest that it needs to be amended.

Taking account of Key Issue 8, it is recommended that the wording of Policy PED 8 is brought forward in the LDP Plan Strategy.

Dfl Planning outlined its concerns with compatibility of the proposed uses referred to in Key Issue 8 and that Council should ensure that all the factors set out in the SPPS have been taken into account.

Other respondents' highlighted concerns pertaining to sui generis uses that may conflict with adjacent tenants and the potential for contamination of zoned land which could be a disincentive for businesses when considering future investment locations.

# Post consultation consideration

Discuss further with Dfl Planning and other key consultees before considering whether to bring forward POP recommendation or

# **Economic Development Uses**

Policy ECD3 Development incompatible with

Policy wording brought forward from PED 8 with minor changes.

#### **Policy PED 9: General Criteria for Economic Development**

Sets out general criteria which economic development proposals will be required to meet, in addition to the other policy provisions within PPS 4.

SPPS accords with Policy PED 9.

SPPS adds that there is a need for LDPs to consider sustainable development. including connectivity with the (public) transport system when zoning land for economic development (as well as for sites outside of this zoned area (para 6.92 and 6.97)). SPPS also advises that LDPs should provide guidance in terms of key design, layout and landscaping requirements for economic development.

Policy PED 9 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy PED 9 is brought forward in the LDP Plan Strategy.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration forward Brina POP recommendation.

Policy PED 9 is now covered by Policy GP1 General Policy for all Development criteria.

#### 21: Sustainable **Development** the Countryside

#### Policy CTY 4: The Conversion and Reuse of Existing Buildings

Provides for the conversion of 'a suitable building' to a variety of uses, including use as a single dwellina. The amplification section states this can include school houses, churches and older traditional barns and outbuildings.

# **SPPS**

SPPS separates the policy for conversion and reuse into one for 'residential use' and another for when the end use will be 'non-residential'.

The policy text in SPPS has been revised to clarify the intent of Policy CTY 4 in respect of the historical or architectural merit of a building to be converted/reused. SPPS therefore refers to 'a locally

# Recommendation/Comment

When Policy CTY 4 terminology, 'a suitable building' was applied, many inappropriate buildings came forward for consideration. The PAC have found that the wording in the SPPS 'a locally important building' takes precedence over the term 'a suitable buildina'.

In relation to Economic Development,

# **POP** Responses and Post **Consultation Consideration** (see Chapter 6 & 7)

Two thirds of statutory consultees and public respondents agreed the policy wording should be amended to reflect SPPS

One public respondent considered the SPPS change in wording would provide little clarification on the policy as both terms are equally ambiguous. HED and some public

#### **Final Wording for Draft Plan Strategy**

Policy CTY 4 has been accounted for within Historic Environment Policy HE8 Non-Listed Locally Important Building or Vernacular Buildings (see above).

Proposals have to be of high design quality and meet 7 criteria, including be of permanent construction, maintain or enhance the building, should not affect the amenities of nearby residents, proposals for non-residential use should be appropriate to a countryside location, all proposals should provide necessary services and safe access. In addition, extensions should be sympathetic to the existing building.

States that buildings of a temporary construction, including agricultural buildings are not eligible for conversion or re-use.

Sets out criteria for the conversion of a traditional non-residential building to more than one dwelling and states that proposals for the conversion of listed buildings will be assessed against PPS 6.

important building' rather than 'a suitable building' as stated in Policy CTY

Under the policy for the conversion of an existing building to 'residential use', SPPS states that, in cases where an original former dwelling is retained as an ancillary building to the new dwelling, it will not be eligible for conversion back to a dwelling.

SPPS does not provide detailed criteria save for repeating Policy CTY 4 and stating that conversions to a 'non-residential use' should be appropriate in nature and scale to its countryside location

SPPS (para 6.87) includes the re-use of rural buildings as one of the proposals which will offer the greatest scope for economic development in the countryside.

SPPS (para 6.87) accords with Policy CTY

11 and refers to farm diversification and

the re-use of existing buildings as

proposals which will offer the greatest

scope for economic development in the

It also states (para 6.73) that new

countryside.

Policy CTY 4 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy CTY 4 is brought forward in the LDP Plan Strategy and amended to take account of the SPPS and therefore separated into policies for residential and non-residential end uses, to refer to 'a locally important building' and to state that a former dwelling previously replaced and retained as an ancillary building to the new replacement dwelling will not be eligible for conversion back into residential use.

In addition this amended policy should signpost proposals for the conversion and reuse of non-listed vernacular buildings to an amended PPS 6 BH 15 built heritage policy.

respondents advocate Council identifying buildings of local importance in their area.

Broad support for Council's suggested amendments to CTY 4 to ensure protection of sustainable economic development within the countryside.

#### Post consultation consideration

Discuss with Dfl and HED before bringing forward POP recommendation.

# Policy CTY 11: Farm Diversification

This policy permits a farm or forestry diversification proposal where it can be demonstrated that is to be run in conjunction with the agricultural operations on the active and established farm.

It also sets out criteria which must be met, and states proposals will only be acceptable where they involve the re-use or adaption of existing farm buildings. A new building is only allowed in prescribed exceptional circumstances.

buildings will only be acceptable in exceptional circumstances.

Policy CTY 11 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy CTY 11 is brought forward in the LDP Plan Strategy.

Some public respondents stated the need to be more flexible in relation to start-up and grow-on business developments associated with agrifood production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in situ.

Others stated there should be a relaxation of planning policy in the countryside for small businesses.

#### Post consultation consideration

Consider whether there is scope to amend this policy in light of the emerging Integrated Economic Development Strategy, particularly as it relates to the agri-food sector.

Policy subsumed under new policy **ECD4**: **Economic** 

**Development in the Countryside** 

# Policy CTY 12: Agricultural and Forestry Development

This policy permits development on an active and established holding and where it can be SPPS (para 6.73) is less detailed than Policy CTY 12, however it accords with Policy CTY 12.

Policy CTY 12 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy CTY 12 is brought forward in

No comments received from statutory consultees or public respondents to this policy.

**Post consultation consideration**Bring forward PO

Policy subsumed under new policy ECD4: Economic Development in the Countryside

demonstrated that policy criteria are met. New build proposals will also have to demonstrate that they meet additional criteria. the LDP Plan Strategy.

recommendation.

#### New SGS6: Strategic Allocation of Land for Economic Development

The existing Larne, Carrickfergus and Ballymena Area Plans zoned approximately 290ha of Economic Development/ Industrial Land in the 3 main towns, It is estimated that approx. 156ha of this zoned land remains undeveloped.

The SPPS (para. 6.92) requires LDPs to ensure there is an ample supply of suitable land to meet economic development needs within the plan area. It also states LDPs should offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different types of economic activity.

The POP set out our suggested approach to developing the LDP Economic Development Strategy.

It is recommended we carry out further assessment to inform the retention of the existing supply of undeveloped zoned land. Also, make provision for additional land in Ballymena where there is currently limited choice and range of zoned sites, as well as making provision for sites for SMEs. Recommended facilitating economic development needs in villages, small settlements and in the countryside.

In general there was strong support for our approach from both statutory consultees and the public. Some points for consideration were raised by Dfl in relation to the element of the EDS relating to villages, small settlements and the countryside.

### Post consultation consideration

Consider issues raised before bringing forward LDP EDS.

# SGS6: Strategic Allocation of Land for Economic Development

This strategic spatial proposal allocates approx. 167ha of land across the Borough, distributed amongst the 3 main towns as detailed.

#### **Councillor & PMT Comments**

Councillors agreed that there is sufficient economic development land zoned in Larne and Carrickfergus, with additional land required to be zoned in Ballymena to offer the required range and choice of sites. No other changes further to above consultations.





Local Development Plan Team County Hall 182 Galgorm Road Ballymena BT42 1QF

Tel: 0300 124 5000 planning@midandeastantrim.gov.uk

