

Submitted to **Belfast LDP 2035 - Plan Strategy**  
Submitted on **2018-11-15 13:51:01**

## Overview

### 1. Data Protection

**Q1. Please tick to confirm that you have read and understood the privacy notice above.**

I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

**Q2. Do you consent for us to publish your response?**

Yes, with my name and/or organisation

### 2. Your details

**Q3. Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?**

**Individual, Organisation or Agent:**

Organisation

**Q4. What is your name?**

**Title:**

Mr

**Full Name:**

Graham Cardwell

**Q5. What is your telephone number?**

**Telephone number:**

██████████

**Q6. What is your email address?**

**Email:**

██

**Q7. Did you respond to the previous Preferred Options Paper consultation phase?**

Yes

If yes, and you have your previous response ID (beginning ANON) please enter it here::

### 4. Organisation

**Q9. If you are responding as a representative of a group or organisation, please provide details below:**

**Organisation:**

Invest Northern Ireland

**Your Job Title:**

Property Executive

**Address Line 1:**

Bedford Square

**Line 2:**

Bedford Street

**Line 3:**

**City:**

Belfast

**Postcode:**

BT2 7ES

**6. Before you submit your comments**

**7. Is the plan sound?**

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

**Q12. Do you consider the Plan Strategy to be sound or unsound?**

I believe it to be sound

**8a. Sound**

**Q13. If you consider the Plan Strategy to be sound and wish to support the Plan Strategy, please set out your comments below:**

**Reasons for support:**

Please see attached file which includes:

- 1 - Belfast LDP 2035 Draft Plan Strategy - Invest NI comments - November 2018
- 2 - Belfast LDP POP - Invest NI comments - April 2017

Invest NI welcomes the opportunity to consider the soundness of the Belfast Local Development Plan Draft Plan Strategy 2035 (the draft Strategy). Our comments should be read in conjunction with those made in relation to the Council's Preferred Options Paper (POP).

As the regional business development agency for Northern Ireland Invest NI's role is to grow the local economy. For this reason our specific focus in reviewing the aforementioned documents has been on those elements of each that relate to economic development or, in our view, could have a particular resonance with economic growth.

As noted in our response to the POP, Invest NI can only speak on behalf of the spatial needs of those businesses meeting its intervention criteria, these will primarily be those which can drive productivity and make the greatest contribution to growing the economy. They represent both indigenous and foreign owned businesses.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

Belfast LDP 2035 Draft Plan Strategy - Invest NI comments - November 2018.pdf was uploaded

**9. Type of Procedure**

**Q18. Please indicate if you would like your representation to be dealt with by:**

Written representations

## **Belfast Local Development Plan 2035 – Draft Plan Strategy**

### **Invest NI Comments – November 2018**

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

### **Regional Development Strategy**

6. The RDS guidance that we have particularly focussed on, either in whole or in part, is as follows
  - RG1 – Ensure an adequate supply of land to facilitate sustainable economic growth
  - SFG1 – Promote urban economic development at key locations throughout the BMUA and ensure sufficient land is available for jobs
  - SFG3 – Enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities
  - SFG4 – Manage the movement of people and goods within the BMUA

## **Strategic Planning Policy Statement**

7. The SPSS guidance that we have particularly focussed on is the section entitled Economic Development, Industry and Commerce found at paragraphs 6.79 to 6.98 inclusive. We have also considered elements of the section considering Development in the Countryside.

## **Belfast Agenda**

8. The Belfast Agenda sets out the Council's vision for the city through to 2035. The economic out working of this is for Belfast to be a city "*where everyone benefits from a thriving and prosperous economy*".
9. To produce this the Council will work towards the delivery of "*a diverse and growing economy and a bigger and more competitive business base, capable of attracting increased visitors and investment. It [the economy] will provide high levels of employment, supported by a skilled workforce and the city will create wealth that can be enjoyed by all.*"
10. Commencing on Page 20, under the banner of inclusive growth, the Agenda sets out a number of priorities over the four year period from 2017-2021, growing the economy being one. Page 21 sets out the economic priorities including creating employment, attracting investment, fostering business growth and strengthening business relationships and reduce economic inequalities.
11. Page 24 sets out a number of stretch goals including the creation of 15,000 new jobs, attracting £1 billion in private sector investment (including FDI) and 4,000 new business start-ups by 2021.

## **Draft Strategy Comments**

12. As noted at paragraph 5 above RG1 concentrates on the supply of employment land for attracting local and inward investment. It highlights the need for there to be an adequate and continuous supply within LDPs and for such land to be protected. Furthermore it places the onus on the Planning Authority to assess the quality and viability of sites zoned and to monitor the take-up and loss of employment land.
13. The draft Strategy, Page 27, notes that the Council will seek to create the conditions to support regeneration and opportunities for attracting high quality

inward investment and jobs. The targeted industries include cultural, ICT services, research and innovative sectors that will contribute to jobs and secure Belfast's role as the regional economic hub whilst supporting growth of indigenous small businesses.

14. We take from this that a primary economic drive of the Council is to create conditions to attract high quality inward investment, the Council, however, should not lose sight of the important role indigenous businesses play in economic growth.
15. Two key objectives are
  - to maintain a strong and growing economy by ensuring range of suitable sites for employment uses are available and able to be developed to meet the future growth of the economy and employment
  - to support local economies by promoting development of suitable land and buildings to provide sustainable access to retail, leisure, culture, office and commercial uses within the city centre and district centres, ensuring the future needs are addressed and their continued vibrancy and viability maintained (*Invest NI underlining*)
16. Paragraph 8.1.7 sets out the economic policy aims, from a spatial perspective Invest NI has particular interest in the following
  - promote sustainable economic development in an environmentally sensitive manner
  - ensure an adequate supply of employment land over the plan period
  - strengthen the local economy by safeguarding a supply of employment land to support the growth of key industrial/business sectors and major employment generating areas
  - ensure flexibility to changing economic environments to continue to attract new investment to the city in competitive global markets
  - ensure the mix of employment land is available in the right locations throughout the city
17. From its perspective Invest NI would consider these aims to be in general conformity with the RDS and the SPPS.

### Economic Policies

18. The Council's economic policies are set out in detail within the draft Strategy Pages 146 to 180 inclusive. From an Invest NI perspective those are most relevant to its role are as follows
  - **Policy EC1 : Delivering Inclusive Economic Growth** – Invest NI considers this policy to be in general conformity with the RDS

- **Policy EC2 : Employment Land Supply** – Invest NI considers this policy to be in general conformity with the RDS and SPPS.

We note that in this policy the 550,000 sq m figure is variously referred to either land or workspace. Policy SP1 specifies 550,000 sq m of Class B employment floor space yet in para 5.1.1 the 550,000 sq m is referred to in the context of land.

Council may wish to consider clarifying this.

- **Policy EC3 : Major Employment and Strategic Employment Locations** – Invest NI considers this policy to be in general conformity with the RDS.
- **Policy EC4 : Loss of Zoned Employment Land** - Invest NI considers this policy to be in general conformity with the RDS.

We would reiterate our POP comments at paragraphs 28 & 29 in the context of vacant land. The gestation period for industrial land to become fully occupied is, in our experience, significantly longer than for other development uses and this should be borne in mind when deciding the “period of time” identified in paragraph 8.1.28

- **Policy EC5 : Industry and Storage and Distribution Uses** - Invest NI considers this policy to be in general conformity with the RDS.
- **Policy EC6 : Office Development** – Invest NI considers this policy to be in general conformity with the RDS. It notes but is unable to comment on the appropriateness of the floor space restrictions for developments outside of the city centre.
- **Policy CC1 : Development Opportunity Sites** – Invest NI considers this policy to be in general conformity with the RDS and SPPS.

We note that site masterplans will be a requirement for development proposals; Invest NI would encourage the council to ensure that in an approved masterplan including business related uses, particularly any of an industrial nature, that access is separated from other uses largely for reasons of health and safety.

- **Policy TLC4 : Evening and Night-Time Economy** – Invest NI considers this policy to be in general conformity with the RDS.

Promoting a Green and Active Place

19. Invest NI's particular focus in areas is around the following policies

- **Policy DC4 : The Conversion and Reuse of Existing Buildings** – Invest NI considers this policy to be in general conformity with the RDS.

We note that the Council will consider non-residential use appropriate to a countryside location. Such properties could offer potential for employment generating uses, particularly those at early stage development or that have spun-out of an agricultural business.

- **Policy DC7: Ribbon Development** - Invest NI considers this policy to be in general conformity with the SPPS
- **Policy DC12 : Farm Diversification** – Invest NI considers this policy to be in general conformity with the SPPS

20. In terms of the draft Strategy's economic elements Invest NI considers the proposals to be in general conformity with the Council's Community, the RDS and/or the SPPS.

>>>>>end of submission>>>>>

## **Belfast Local Development Plan 2020-2035**

### **Preferred Options Paper: Consultation Response from Invest NI**

**April 2017**

#### **General Comments**

1. Invest NI welcomes the opportunity to comment on the Belfast Local Development Plan Preferred Options Paper (POP).
2. It is important to note that Invest NI can only comment on the needs of those companies which meet its intervention criteria, these businesses will primarily be those which can drive productivity and make the greatest contribution to growing the economy.
3. It is therefore the view of Invest NI that, in preparing the Local Development Plan (LDP), the Council should ensure that it makes sufficient provision for those businesses that fall outside our remit; typically these will include those involved in areas such as distribution, logistics and retail.
4. We note that in developing its POP the Council has had regard to regional policy, reviewed planning policy statements and considered spatial issues arising from the Community Plan.

#### **District Profile**

5. On Page 8 of the document, in line with the Regional Development Strategy 2035 (RDS) settlement hierarchy, the Council states that Belfast will accommodate economic development through the expansion and creation of industrial estates and modern enterprise and business centres. We understand that this classification also includes offices.
6. In terms of the industrial land provision Invest NI would highlight the importance of providing a choice and variety of suitable sites across the Plan area to respond to the changing, and indeed varying, nature and requirements of business and industry. We would identify the opportunity for re-use of brownfield sites in this regard but note the potential for remediation costs which can affect the affordability of such a solution.
7. Invest NI notes the identification of the three small settlements of Edenderry, Hannahstown and Loughview which can provide opportunities for small rural businesses. Their addition to the variety and choice of locations for business is to be welcomed.
8. Invest NI would point to the need for the new LDP to make provision for economic development opportunities in the countryside. It is important that businesses in rural locations which have arisen in response to a particular need within their community/locale are afforded an opportunity to develop and grow in situ. The cost implications of moving a small rural business to a larger settlement can be prohibitive.

## Vision and Objectives

9. Invest NI notes and is supportive of the economic elements of the City and Local Development Plan Visions as detailed on Page 11.
10. We note on Page 13 under the strategic aim of **shaping a liveable place** that the Council will *“try to protect and manage Belfast’s built heritage, whilst also supporting innovative new uses and ensure that new developments enhances their distinctive character and features to contribute to the identity of local places.”*
11. Invest NI welcomes the Council’s recognition of the importance of Northern Ireland’s built heritage. Former industrial premises are an important part of this heritage which with sympathetic restoration can continue to contribute towards economic growth, as demonstrated in the recent redevelopment of a number of former warehouses in the Linen Quarter.
12. We do, however, recognise that there may be occasions where such properties may not viably lend themselves to schemes where industry is the sole (or primary) focus of the development. In such circumstances we would encourage the Council to ensure that these buildings are not wholly lost to non- business/industry uses. They may still offer economic opportunities, such as for office or workspace provision, which could comfortably sit alongside other uses.
13. In regards to the Council’s Strategic Aim of creating a vibrant economy, Invest NI welcomes the intention to create the conditions and support the regeneration opportunities for attracting high quality inward investment and jobs.
14. We note the objectives linked to this Aim and are particularly supportive of those detailed at points 7 and 8 on page 14 of the POP. As previously noted at our point 6 above it is important to ensure there is a provision of a choice and variety of suitable sites across the plan area.
15. We assume that the term **commercial uses**, in bullet point 8, includes those falling within Part B Industrial and Business Uses as defined by The Planning (Use Classes) Order (Northern Ireland) 2015. It is the view of Invest NI that businesses within this Class have the greatest potential to grow our economy through a focus on exports, R & D and innovation.
16. Invest NI notes the Council’s support for an efficient integrated transport network. Transport plays an important role in enabling increased access to employment opportunities not only across Belfast but also across Northern Ireland. It also providing the means by which businesses are able to transport goods and access their markets. In this respect, good transport links to the sea and air ports are attractive features when seeking to grow, or attract, manufacturing projects to the area.

## Supporting Economic Growth

17. We note the Council’s preferred LDP strategy will be to provide a framework that supports investment and development to achieve a successful and sustainable economy taking key decisions to create the conditions and supporting infrastructure. We also note that this is linked to an increased requirement for residential accommodation.

18. Invest NI welcomes preferred option GR1 on Page 21 which identifies that the LDP policies will be based on ambitious growth aspirations with appropriate employment land being delivered. It would again point to the need to ensure the provision of a choice and variety of suitable sites across the Plan area.

### **Shaping a Liveable Place**

19. Preferred option LP13 notes that the LDP will include an over-arching strategic policy to ensure that all new developments promote greater connectivity between places. As noted at paragraph 16 above. Invest NI sees a clear link between connectivity/transport and economic growth and sees merit in the Council's approach.
20. The potential for development of masterplans or supplementary guidance to identify development sites and to guide development within them where regeneration potential exists is noted. In this scenario new blocks and plots will be developed around existing and proposed transport infrastructure; Invest NI again sees merit in this approach. We would contend that masterplans or supplementary guidance may also include provision for developments, either in whole or in part, that could support economic development and generate employment opportunities for those living in (or in proximity to) the area.
21. Invest NI notes Option LP15 in relation to heritage assets of the city and the issues and demand pressures which affect them. Invest NI would reiterate its comments at paragraphs 10 to 12 above concerning the economic opportunities offered by former industrial premises.
22. We note that the Council intends to retain Planning Policy Statement 23 in its current form within the new LDP.

### **Creating a Vibrant Economy**

23. Section 7.1.1 notes that in considering the need for employment land it is usual to assess the requirements of those businesses in Class B of the Planning (Use Classes) Order (NI) 2015 as being distinct from those jobs linked to services.
24. Invest NI agrees with preferred option VE1, to identify and maintain a flexible and varied supply of business accommodation and employment land that is of the right type and in the right locations. It notes the Council's aspiration to identify sufficient land to ensure the supply of 486,400 to 608,000 sq. m. of floor space for B-Class employment uses to 2035. It notes that the largest anticipated requirement will be from the B1a (General Office) use class.
25. Invest NI considers the availability of suitable property (including industrial/employment land) as playing an important role in Northern Ireland's ability to attract and retain investment. We note that the exact level of land to be allocated within the LDP will be informed by more detailed information relating to current businesses, land availability and vacancy.
26. Invest NI reiterates its commitment to the LDP process and will continue to engage with the Council and provide information relating to its current property holding as required.

## Strategic Employment Locations

27. Invest NI notes that the Council's preferred option is to review strategic employment sites as set out in BMAP and identify new smaller opportunity sites to ensure projected employment needs are accommodated across the plan period
28. We note that the policy direction on page 60 is that the LDP should identify previously developed land within settlements for potential economic development use in order to return vacant or underused land to productive use.
29. In principle Invest NI can see the merits in a proposal such as this as it has the potential to secure land for industrial development that might otherwise be lost. As an owner of industrial land within the district we would wish the Council to note that we do not consider our land to be either vacant or underused.

## Protection of Existing Employment Locations

30. Invest NI welcomes the Council's preferred option VE3 to protect areas of existing employment against competing uses and the presumption in favour of retaining an employment focus where sites become available. It is content that this focus may include a range of B use class and sui generis uses to help drive future employment growth.
31. Invest NI recognises the importance of employment generating uses, such as those considered to be sui generis. The Council should, however, also be particularly mindful of the wider economic benefits that can be derived from those businesses within the B use class through, for example, their greater focus on exporting, innovation and R &D. We consider these to be important drivers of economic growth which in turn can generate new employment opportunities.
32. While we welcome the protection afforded by VE3, Invest NI notes the view on Page 62 that the LDP should allow alternative uses "where there is evidence that the site has been marketed for a reasonable period of time and there has been no take-up for employment use or redevelopment together with evidence of viability". We would suggest that any evidence provided in support of a change of use should demonstrate an **active** marketing of a site to potential purchasers. It should not, for example, be considered sufficient to simply erect signage within the site advertising it for sale as this significantly limits a potential audience.
33. VE11's aim of increasing the population of Belfast city centre with a view to bringing added vitality is to be welcomed. The re-use of existing buildings and bringing vacant space back into use adds to the vitality of the city centre. It is the view of Invest NI that in order to achieve this it is important to ensure an appropriate balance of uses. The redevelopment of existing buildings or vacant space can offer opportunities to include an element of workspace or office accommodation which can readily co-exist with residential use in appropriately designed developments.
34. Living over the Shop is identified as an option in meeting a housing need. We would suggest that such premises could also offer opportunities for "Working over the Shop"; the conversion of currently empty or unused space to include, for example, office accommodation. Such mixed use redevelopment brings the added advantage of

maintaining vitality during the business day and adding to the potential footfall for shops and cafes in the vicinity.

35. Invest NI notes the Council's intention, on Page 78, to provide a policy framework to guide development and regeneration opportunities. This may include reference to developer agreements and contributions that can better facilitate the development of land and activities to be carried out within the city centre.
36. Generally speaking, whilst Invest NI can appreciate the application of a "developer pays" principle in respect of private sector developments where the primary motivation might be the generation of financial benefit for the developer, it would caution against its application in respect of public sector developments where wider societal benefits are the driving force rather than profit. In such cases, it could be considered that delivery for the greater economic good is community benefit in and of itself. In addition, the imposition of such additional cost has the potential to adversely affect, and potentially inhibit, project deliverability.

### **Planning Policy**

37. We note that the Council has undertaken a review of Planning Policy Statement 4: Planning and Economic Development. Moving forward the Council intends to revise and amend a number of the policies within the document, including policy PED7.
38. Having worked closely with the Department of the Environment in the development of Planning Policy Statement 4 Invest NI would be keen to engage with the Council in respect of any proposed revision of the policy in so far as it relates to economic development.

### **Transportation**

39. Preferred Option SCR5 Public Transport Network notes that the LDP should protect the land required to facilitate new public transport schemes or planned improvements to the existing network. Invest NI recognises the importance of the transportation network, both in the immediate plan area and beyond to the rest of NI, the British Isles and beyond.

### **A Green and Active Place – Planning Policy Statement 21**

40. We note that the Council considers Planning Policy Statement 21 to be generally fit for purpose and that it is proposed that the vast majority of policies will be retained albeit with some minor changes to reflect the SPPS.
41. Within PPS 21 Policy CTY 8 – Ribbon Development confirms that the infilling of small gap sites with appropriate economic development proposals (including light industry) may be acceptable in certain circumstances. The SPPS, however, lists infilling under residential development which would seem to be more restrictive than the original policy.

42. In line with original PPS 21 we would encourage the Council to permit appropriate economic development of a scale in keeping with adjoining development within small gap sites.

>>>>>end of submission>>>>>