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15th November 2018

Dear Sir

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

Further to the draft Local Development Plan ("LDP") published by Belfast City Council ("the Council") on 23rd August 2018 please find attached our submission as part of the formal consultation process. This submission ("The TQ submission") is a joint submission on behalf of Titanic Quarter Limited ("TQL"), as the promoter of Titanic Quarter and Belfast Harbour Commissioners ("BHC") as the owner of the lands at Titanic Quarter.

It is important to state at the outset that TQL and BHC are aligned with and supportive of the broad vision and aims set out in the draft LDP and in particular "for Belfast to be a globally successful, smart, regional city with a vibrant economic heart" and with "thriving, socially inclusive well-connected neighbourhoods". However, TQL and BHC's analysis as to the planning framework and policies necessary to deliver the strategic aims and objectives set out in the draft LDP and how they apply to Titanic Quarter differ in a number of material respects from the Councils'.

The TQ submission has been prepared in conjunction with our planning advisers, Turley, with further expert input from Turley Economics and CBRE. The draft LDP is by its nature a detailed and technical document and the TQ submission therefore reflects that and is also technical in nature. Furthermore, the consultation feedback mechanism is prescriptive, requiring those making a response to cross reference the changes they would wish to see to specific policies and the areas where the "soundness test" is viewed as being "offended". The TQ submission meets the requirements set for the consultation and sets out the specific changes sought to the draft LDP.

Following the detailed review of the draft LDP undertaken by TQL and BHC it is apparent that there are a number of the draft strategy policies contained within the draft LDP that are:

- not aligned with the RDS strategic planning guidance as it refers to Titanic Quarter;
- not aligned with other city plans and strategies including the Belfast City Council's Regeneration and Investment Strategy (BCCRIS);
- not aligned with the available evidence;
- not aligned with or fail to realise the ambitions of the "Belfast Agenda" Community Plan, including priorities for "Growing the Economy" and "City Development"; and
- not aligned with the established planning context in Titanic Quarter, in terms of the agreed Development Framework (as amended), the Concept Master plan and Design Principles documents; and the numerous extant and implemented permissions.

TQL and BHC await a response to the matters raised in due course as part of the next stages of the development of the LDP. However, in the meantime and given the material and significant impact that the draft LDP could, in its present form, have on future activity at Titanic Quarter, it is essential that the commercial consequences of the application of the policies contained within the draft LDP are clearly communicated to the Council at this stage.

Since 2003, working together with BHC, TQL has transformed the 180-acre derelict former shipyard site into a thriving neighbourhood that is an integral part of the Belfast proposition to residents, visitors, office occupiers and investors alike and is central to Belfast's future. It has been a design led regeneration, which has required additional commitment and investment from the promoters as that approach requires a hierarchy of planning documents, led by a Development Framework. This was followed by a Concept Master plan from which Design Principles documents were devised and agreed with the planning authorities in order to secure delivery in line with an agreed vision. Collectively, this hierarchy of planning documents guides the comprehensive development of Titanic Quarter in order to realise a blend of uses, synchronised with the phased delivery of accompanying infrastructure.

The draft LDP overlooks or ignores this vision and the comprehensive design led approach that has been applied to date. Titanic Quarter has been promoted by TQL and BHC as one of the largest waterfront developments in Europe a vision endorsed and echoed by the Council to the extent that Titanic Quarter and Titanic Belfast are now synonymous with Belfast city centre. However, this vision was and is predicated on the basis of the Development Framework, which envisions a mixed-use development with a substantial Grade "A" offices and waterfront residential development at city centre densities, two essential elements that the draft LDP would significantly constrain.

The activity undertaken at Titanic Quarter to date has resulted in c£425m of total investment in developments such as Citi Gateway Offices, PRONI, Belfast Met Titanic Campus, The ARC residential complex, 2 Hotels, film studios and numerous other buildings. Much of this development would simply not have been possible or permissible if the policies within the draft LDP had been in place when the project commenced.

TQL and BHC have also invested to pump prime infrastructure and public realm for the entire site, including, Titanic Belfast – a world leading visitor attraction, the Slipways, the Maritime Mile etc. all supported by other infrastructure such as roads, walkways and cycle paths. The introduction of the Glider service by Translink is the most recent addition to the local and developed infrastructure. Titanic Quarter is one of three introductory Glider routes and this serves to highlight the City's ambitions for the development of the area, and in particular the aim to facilitate the movement of office workers travelling between Titanic Quarter and other parts of the city.

Throughout the 15-year development period to date the development has been managed strategically and undertaken in a balanced, phased approach, respecting planning guidelines and policies to create a new living quarter that all of Belfast can be proud of where c20,000 people live work and visit on a daily basis. TQL and BHC have ambitious plans for the future development of Titanic Quarter and aim to create significantly more than the same value again over the course of the next 15 years through further balanced, mixed use development of residential, commercial and leisure projects.

If that development goes ahead then further investment in infrastructure, public realm and other community and social development can also take place as has been delivered before. However, this potential value added for the city is jeopardised if elements of development that have previously been permitted, particularly in respect of office planning designation and residential density, are now significantly restricted or true mixed-use balanced development is no longer possible due to a revised planning framework being introduced at Titanic Quarter some 15 years after development commenced.

Based upon its analysis and as set out in the TQ submission, TQL and BHC believe that the draft LDP and the application of the policies within it would significantly limit the potential for development at Titanic Quarter over the period to 2035. That would have commercial consequences for the promoters but it would also have an adverse impact on Belfast and make it harder for the city to realise its potential as set out in the Belfast Agenda. As promoters that have played a key role in the regeneration of the City, TQL and BHC are anxious to ensure that this adverse impact is avoided by clearly communicating the consequences to the Council at this stage. It is this that motivates the desire of TQL and BHC to engage to the fullest extent possible in the process of consultation on the draft LDP as regards its impact on Titanic Quarter.

The TQ submission identifies the specific areas where amendments are sought to the draft LDP. These amendments include redrawing the boundary of the area included within the definition of Belfast city centre to include Titanic Quarter and to identify Titanic quarter as a “development Opportunity area”. In addition the TQ submission seeks amendments to proposed permitted office uses, the permitted density of residential development and building heights at Titanic Quarter. As set out in the TQ submission, acceptance of these amendments does not prejudice development in any other part of the City and in the view of TQL and BHC makes the achievement of the overall vision and aims set out in the draft LDP more not less likely.

Yours faithfully



Nick Reid
Executive Chairman

CC Suzanne Wylie, CEO Belfast City Council
CC Joe O'Neill, CEO Belfast Harbour

Representation on behalf of Titanic Quarter Ltd and Belfast Harbour Commissioners

November 2018



Turley

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Contact

Brian Kelly



15 November 2018

Executive Summary

1. Titanic Quarter Limited and Belfast Harbour Commissioners welcome the Council's Local Development Plan Draft Plan Strategy as a key milestone towards defining the framework for investment in the city to 2035.
2. As you would expect, the opportunity is taken here to seek to align the emerging city vision with the progress made to date in regenerating Titanic Quarter, together with the planned investments and projects that will be brought forward in the near future.

Progress in regenerating Titanic Quarter

3. Since publication of the previous draft local plan for the city very significant progress has been made in the regeneration of Titanic Quarter, whilst at all times responding to changes in the market, refreshing the visitor destination offer and adapting to other changes in context, including integration with more sustainable forms of public transport.
4. TQL and BHC have worked together to transform the 180 acre former shipyards into a thriving neighbourhood that is an integral part of the Belfast proposition to residents, visitors, office occupiers and investors alike and is central to Belfast's future.

Growth of Belfast City

5. Despite market shifts there has been significant delivery of projects within Titanic Quarter, with an emphasis on tourism, creative industries, leisure, the residential community and Grade A offices. Titanic Belfast has exceeded expectations in terms of growing visitor numbers, with TQ developed into a multi-faceted tourism offer anchored by a number of key heritage assets. A residential community is now established, set within a maturing landscape and public realm and supported by a mix of local uses. In the period 2007 to 2016 approximately 6,000 permanent jobs have located at Titanic Quarter and it welcomes over 1 million visitors each year. These metrics demonstrate the contribution TQ is making to Belfast City and underline the importance of maintaining the success and momentum of the overall project.

Devising the planning context

6. In planning terms, there have been considerable context changes since publication of the Belfast Metropolitan Area Plan in 2004. A significant achievement at Titanic Quarter was to devise a hierarchy of planning documents, led by the Development Framework (as amended), the Concept Masterplan and Design Principles documents, to guide decisions on future planning applications and to secure delivery in line with an agreed vision that is consistent with regional and local planning policy¹. Together, this hierarchy of planning documents guide the comprehensive development of this new urban quarter, to realise a blend of uses, synchronised with phased delivery of infrastructure and supporting services (i.e. public transport). Subsequent planning permissions, approximately 40 in total, were required to be consistent with the hierarchy of agreed planning documents.

¹ Noting that the size of these documents are greater than the 10mb allowance by Council, we are providing a WeTransfer link so that Council can access these documents – please note that the following link will expire after a week: [link](#)

Achieving a Sound plan

7. Titanic Quarter and Belfast Harbour Commissioners note the content of the Draft Plan Strategy and within this submission, the appended office need assessment report (jointly prepared by CBRE and Turley Economics) and other supporting appendices, outline the required modifications and the evidence for justifying those changes. Achieving Soundness of this plan coincides with ensuring there is a certain and rational planning context for investment at Titanic Quarter. Ultimately, these changes are necessary to ensure the LDP is aligned to delivering regeneration and realising the city’s ambition for sustainable economic growth.

8. There are a number of the draft strategy policies which in our considered view are:
 - Not aligned with the RDS strategic planning guidance as it refers to Titanic Quarter;
 - Not aligned with other city plans and strategies including the Belfast City Council’s Regeneration and Investment Strategy(BCCRIS);
 - Not aligned with the available evidence;
 - Not aligned with or realise the ambitions of the ‘Belfast Agenda’ Community Plan, including priorities for ‘Growing the Economy’ and ‘City Development’; and
 - Not aligned to the established planning context in Titanic Quarter, in terms of the agreed Development Framework (as amended), the Concept Masterplan and Design Principles documents; and the numerous extant and implemented permissions.

Delivering the Belfast Agenda

9. Titanic Quarter Ltd and Belfast Harbour Commissioners, as city stakeholders, have engaged with the sequence of consultations that have informed our city strategies, more recently with the BCCRIS and then the ‘Belfast Agenda’. The Belfast Agenda commits to delivering the BCCRIS, to maximise the benefit of key city infrastructure projects such as delivery of Grade A office space and to deliver the ‘shared ambition’ of ‘encouraging city centre living and creating a vibrant, well-connected environment for people to enjoy’.

10. We summarise below the modifications sought and the soundness tests which the policies, in their current form, fail to satisfy:

Table 1.1: Summary of Modifications & Soundness Test

DPS Section	Policy	Modification Sought	Soundness Test
Vision, Aims & Objectives	N/A	Amend the City Centre boundary to include Titanic Quarter	CE2, CE4
Spatial Development	SD2	Amend the City Centre boundary to include Titanic Quarter	C1, C4, CE2, CE4

Strategy	SD3	Identify TQ as a standalone development opportunity area	C1, C4, CE2, CE4
		Amend wording of proposed policy in line with Para. 7.7 of our submission	
	HOU4	Provide clarity with respect to identification of tall buildings within the city centre as there is no reference to the identification of sites in DES3	CE2
Shaping a Living Place	HOU5	Undertake actions recommended in Para. 7.33 of our submission and undertake further consultations with housing sector (including TQL & BHC) to develop a workable affordable housing policy	C3, CE1, CE2, CE3
	HOU6	Delete policy	CE1, CE2
	DES3	Revisit the threshold of 35m Remove text ' <i>those which are significantly higher than their surroundings</i> ' Amend the wording in line with bullet points b) to f) of Para 7.20 of this submission	CE2
	EC2 & EC3	Recognise Titanic Quarter as forming an important segment of the City Centre commercial office market	
Creating a Vibrant Economy	EC2 & EC3	Identify Titanic Quarter as a location of choice for offices	C1, C2, C4, CE2, CE4
	EC6	Amend in a manner that is commensurate with requested modifications to EC2 and EC3	
	CC1	Amend text/mapping error Identify TQ as a standalone development opportunity area	C1, C4, CE2, CE4
Building a Smart Connected & Resilient Place	TRAN8	Ensure inbuilt flexibility of the policy in line with recommendations set out in Para 9.7 of this submission	C4, CE2
	TRAN9	Prepare an up to date evidence base	CE2

Design led approach

- Design led regeneration of the entirety of Titanic Quarter was a significant commitment made by TQL and BHC at the outset of the project, taking detailed account of the site's context, to devise strategies around building heights, development density, public realm, parking provision, building design and active frontages, public art and a street hierarchy. These strategies were devised holistically and in context to deliver a new piece of city, agreed with the planning authority and

applied to inform design and planning parameters for each development project and to give certainty to the decision taker.

12. Introduction of an alternative set of design parameters at this stage, in this draft strategy, not alone seeks to overlook the comprehensive design led approach of this urban quarter and the consistent approach to numerous developments that already have permission, but confuses the vision for the place by introducing alternative height and density limits/guidance. In this submission we demonstrate that investments made at Titanic Quarter and elsewhere on the Belfast waterfront would not have been realised had these policies been in place.

Next Steps

13. We submit that the vision, aims and objectives for Belfast City will not be realised without the recommended modifications to the DPS and otherwise the lack of alignment with strategies, policy and evidence, together with unnecessary design restrictions will inhibit investment at Titanic Quarter and hinder future growth of the city.
14. We respectfully submit these representations to draft strategy policies for your consideration and incorporation within the final LDP in order to achieve a sound plan for Belfast City.

1. Introduction

- 1.1 This submission has been prepared by Turley, as a joint submission, on behalf of Titanic Quarter Limited (“TQL”), as the promoter of Titanic Quarter and Belfast Harbour Commissioners (“BHC”) as the owner of the lands at Titanic Quarter, in response to the publication of, and formal consultation on, Belfast City Council’s (‘the Council’) Draft Plan Strategy (‘DPS’).
- 1.2 TQL and BHC welcome the publication of the Draft Plan Strategy and the progress that the Council is making towards adopting a local development plan for Belfast.
- 1.3 This submission follows a lineage of responses by our client to city planning consultations which have sought to clearly identify the unique and distinct opportunity that the Titanic Quarter (TQ) represents for Belfast and the wider NI Region, such as:
 - Belfast City Masterplan Review - response issued December 2013;
 - Initial Directions Paper - response issued August 2014;
 - Draft Regeneration Strategy and Investment Plan – response issued May 2015; and
 - Preferred Options Paper – response issued April 2017.
- 1.4 A key theme of our responses to previous consultations was to underline the role of Titanic Quarter as the complementary and essential economic driver for revitalising the city. The complementary role performed by Titanic Quarter to the traditional City Centre extends to include:
 - re-branding/re-imagining the city;
 - drawing people to Belfast to live, work and play - locally and internationally;
 - attracting inward investment and creating significant employment; and
 - acting as a principal driver for sustainable citywide growth.
- 1.5 Recognising the vital contribution of TQ and the wider Belfast Waterfront to the traditional city core should be a fundamental pillar of the emerging Plan Strategy.
- 1.6 The purpose of this submission is to provide the clear evidence base required to show that the DPS, in its current form, is ‘unsound’ as it unnecessarily curtails investment at Titanic Quarter and fails to accommodate anticipated future levels of growth.
- 1.7 This evidence base includes a comprehensive Belfast Office Needs Assessment, which has been jointly prepared by Turley Economics and CBRE, and is appended to this submission.
- 1.8 Additionally, we provide commentary and recommendations on how the plan would be more ‘sound’, if amended in line with this submission. Indeed, the authors of this

submission have a considerable amount of experience providing professional planning services in Belfast City and throughout Northern Ireland.

- 1.9 To ensure that this representation is set within the appropriate planning context, we have reviewed all legislative, regulative and policy requirements/guidance associated with local development plans in Northern Ireland and all supporting documents associated with the DPS and the preferred Options Paper, which are relevant to the topics/policies which we make comment on.
- 1.10 Commentary is not provided on every aspect of the DPS, but is reserved only for those elements of the DPS that are of relevance to TQ and to which we are seeking modifications. In light of this, the submission responds to 18 individual draft policies.

Structure of the Report

- 1.11 This remainder of this submission has been structured to reflect the structure of the DPS:

- Section 2 - Legislative Context
- Section 3 - Soundness in Plan Making
- Section 4 - Titanic Quarter – An Overview
- Section 5 - Vision, Aims & Objectives
- Section 6 - Spatial Development Strategy
- Section 7 - Shaping a Living Place
- Section 8 - Creating a Vibrant Economy
- Section 9 - Building a Smart Connected & Resilient Place
- Section 10 - Recommendations

- 1.12 Finally, the submission is supported by the following appendices:

- Appendix 1: Extent and Current Status of TQ
- Appendix 2: TQ – Context and Evolution
- Appendix 3: TQ – Policy Context
- Appendix 4: TQ – Delivery
- Appendix 5: TQ – Economic Potential Brochure
- Appendix 6: Belfast Office Needs Assessment
- Appendix 7: BCC’s DPS Form

2. Legislative Context

- 2.1 Sections 6 (1) and (2) of the Planning Act (Northern Ireland) 2011 (the 2011 Act) set out that in Northern Ireland, the local development plan (LDP) for each of the 11 local authorities comprises a plan strategy (PS) and a local policies plan (LPP).
- 2.2 The PS represents the first formal stage of the two stage LDP process and Section 8(1) of the 2011 Act requires all Councils in Northern Ireland to prepare a PS for their districts. Section 8(2) advises that a PS must set out:
- (a) the **council's objectives** in relation to the development and use of land in its district (our emphasis);
 - (b) its **strategic policies** for the implementation of those objectives (our emphasis); and
 - (c) such other matters as may be prescribed.
- 2.3 It is worth noting that the requirements of a PS differ to those of a LPP, which are set out under Section 9(2) of the 2011 Act, these being:
- (a) the **council's policies** in relation to the development and use of land in its district (our emphasis); and
 - (b) such other matters as may be prescribed.
- 2.4 Essentially, the purpose of a PS is to provide the strategic policy framework for the plan area as a whole across a range of topics², whereas the purpose of the LPP is to set out the local policies and site specific proposals in relation to the development and use of land in its district³.
- 2.5 Section 8(5) prescribes the following elements which a Council must take into account when preparing a PS:
- (a) the regional development strategy (i.e. the RDS 2035);
 - (b) the council's current community plan (i.e. The Belfast Agenda);
 - (c) any policy or advice contained in guidance issued by the Department (i.e. the SPPS); and
 - (d) such other matters as the Department may prescribe or, in a particular case, direct.
- 2.6 However, it is noted that Section 8(5) also provides the Council with discretion to have regard to such other information and considerations as appear to the council to be relevant.

² Development Plan Practice Note 07 - The Plan Strategy, April 2015

³ Development Plan Practice Note 08 - The Local Policies Plan, April 2015

2.7 In terms of form and content, Part 4 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 (the 2015 Regs) set out the relevant requirements. It is important to highlight that regulation 12 (2) of the 2015 Regs states that '*A development plan document must contain a reasoned justification of the policies contained in it*'. Furthermore, regulation 12 (3) requires such reasoned justification of the policies to be clearly distinguishable from the policies.

2.8 The Department has set out a number of objectives within Development Plan Practice Note 07 - The Plan Strategy, dated April 2015, which should be incorporated in the PS. These objectives are reproduced below, as they have helped to guide our review, assessment and critique of Belfast City Council's Draft Plan Strategy:

- reflect longer term local aspirations, based on a vision, objectives and strategic policies agreed to by the community and stakeholders;
- provide a plan-led strategy specific to the area covered, to act as a basis for rational and consistent decisions about the use and development of land and identify interdependencies and relationships between places both within and across administrative boundaries;
- provide a settlement hierarchy which identifies settlements and their role within the hierarchy in accordance with the RDS 2035 Spatial Framework Guidance and any policy or advice issued by the Department such as the SPPS and the current community plan;
- allocate land for housing whilst taking account of the strategic objectives and guidelines contained in the RDS and any policy or advice issued by the Department such as the SPPS and the current community plan;
- facilitate economic development and the creation of employment whilst taking account of the RDS 2035 Spatial Framework Guidance and any policy or advice issued by the Department such as the SPPS, and the current community plan;
- facilitate sustainable patterns of growth and regeneration whilst promoting compact urban forms and protecting and maintaining distinctive local character and viability. This may include strategic zonings and/or policy areas where considered necessary;
- identify and define, as appropriate, transportation related proposals, whilst taking account of the RDS and regional transportation proposals contained in Ensuring a Sustainable Transport Future (ESTF);
- conserve, sustain and enhance the area's environmental qualities, *local distinctiveness and sites of environmental importance in terms of* landscape character and diversity, wildlife and habitats, townscape and archaeology;
- promote the development of sustainable tourism, recreational and other community facilities that will positively contribute to the amenity and wellbeing of the population; and

- facilitate the promotion of equality of opportunity and good relations between persons of different religious belief, political opinion or racial group.
- 2.9 The Department also advises councils to ‘...aim to ensure that its PS is **both realistic and deliverable** taking into account the **resources available and any potential constraints** which may arise during the plan period (our emphasis). Furthermore, in order to allow for unforeseen circumstances, the Department directs councils to ‘...aim to incorporate **a degree of flexibility** within its PS **to ensure** that its objectives and strategic policies for its area can still be **delivered**’ (our emphasis).
- 2.10 Once drafted, a PS is required to undergo a formal 8 week period of public consultation and following this, all representations submitted will be made available for public inspection (counter representations) for a further 8 week period. The Department advises that all representations should provide evidence to demonstrate why the draft PS is unsound and/or how any proposed changes make the draft PS more sound⁴.
- 2.11 Ultimately, the plan strategy will undergo an independent examination and must be found ‘sound’ if it is to be formally adopted.

⁴ Development Plan Practice Note 07 - The Plan Strategy, April 2015

3. Soundness in Plan Making

- 3.1 The keystone of the local development plan system is the principle of ‘soundness’. Section 10(6) of the 2011 Act provides that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document:
- (a) whether it satisfies the requirements of sections 7 and 8 or, as the case may be, sections 7 and 9, and any regulations under section 22 relating to the preparation of development plan documents; and
 - (b) whether it is **sound**.
- 3.2 The Planning Act (Northern Ireland) 2011 does not define the meaning of ‘soundness’. However, Development Plan Practice Note 6 – Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of ‘showing good judgement’ and ‘able to be trusted’.
- 3.3 Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:
- how the development plan document (DPD) has been produced;
 - the alignment of the DPD with central government regional plans, policy and guidance; and
 - the coherence, consistency and effectiveness of the content of the DPD.
- 3.4 DPPN 6 advises that ‘soundness’ involves testing the principles, content and preparation process of the DPD against a list of key criteria. DPPN 6 then sets out the following tests which ‘...aim to provide a framework to assess the soundness of the DPD, whilst taking account of all relevant procedural, legislative and policy considerations’:

Procedural tests

- *P1. Has the plan been prepared in accordance with the council’s timetable and the Statement of Community Involvement?*
- *P2. Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- *P3. Has the plan been subject to sustainability appraisal including Strategic Environmental Assessment?*
- *P4. Did the council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?*

Consistency tests

- *C1. Did the council take account of the Regional Development Strategy?*

- *C2. Did the council take account of its Community Plan?*
- *C3. Did the council take account of policy and guidance issued by the Department?*
- *C4. Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness tests

- *CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring councils.*
- *CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.*
- *CE3. There are clear mechanisms for implementation and monitoring.*
- *CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.*

3.5 Although the tests of soundness are based upon three categories – procedural, consistency, coherence and effectiveness, there is a degree of overlap in terms of the criteria used for each test. The purpose of the IE will be to examine how the DPD meets each test and determine whether the DPD is sound as a whole.

4. Titanic Quarter - An Overview

Introduction

4.1 This section seeks to provide a brief overview of the Titanic Quarter (TQ), but to fully understand TQ, it should be read in combination with the more detailed information set out within each of the following appendices:

- Appendix 1: Extent and Current Status of TQ
- Appendix 2: TQ – Context and Evolution
- Appendix 3: TQ – Policy Context
- Appendix 4: TQ – Delivery
- Appendix 5: TQ – Economic Potential Brochure
- Appendix 6: Belfast Office Needs Assessment

4.2 Titanic Quarter is a 75 hectare former shipbuilding site in central Belfast. Redevelopment of Titanic Quarter commenced in 2003 and represents one of the Europe’s largest urban-waterfront regeneration projects and it is redefining what it means to work, live, play and stay in central Belfast.

4.3 In the past decade much has been achieved - Titanic Quarter has gone from a master plan to reality as a thriving and bustling destination, attracting over 1 million visitors every year. With £425 million of investment completed to date, 18,000 people live, work, study and play in Titanic Quarter daily.

Policy Context

4.4 Section 8(5) of the Planning Act (Northern Ireland) 2011 requires the Council, when preparing a PS, to take into account, among other things, the regional development strategy, i.e. the RDS 2035. Having reviewed, the RDS 2035 (See Appendix 3), it is clear that it fully recognises the importance of TQ for Belfast City.

4.5 Indeed, SFG3 of the RDS 2035 states that Belfast has a key role to play as the centre of regional administration and providing business services. It then identifies TQ as being a sole contributor to the growth of Belfast’s role as it advises that Belfast’s role ‘...will grow further as the residential, commercial and leisure potential of the Titanic Quarter lands area is realised’

4.6 This is a fundamental and important acknowledgement by the RDS. It is clear that the RDS understands and appreciates that success at TQ equates to success for Belfast City. This understanding aligns with the consistent message that we have been communicating to the Council for a number of years and through our various representations to consultations, as identified in Section 1 – Introduction.

- 4.7 We note that even the DPS, in the justification and amplification text to proposed Policies SD2 and EC7 (see Section 6), acknowledges the importance of TQ in terms of its contribution to the economic success of Belfast City. However, the DPS fails to provide the necessary policy support for TQ that would ensure that it is consistent with the RDS 2035.
- 4.8 In light of this, there is clearly some tension between the proposed policies in the DPS and the RDS, particularly with respect to SFG1 and SFG3 of the RDS, which makes this component of the DPS unsound as it fails to satisfy Section 8(5) of the Planning Act (NI) 2011 (i.e. soundness test C1).

Complementary Role of TQ

- 4.9 TQ has a proven track record of delivering employment and economic success for the city of Belfast and the wider region. As a complementary and distinct location, it provides a comparative advantage for the Belfast City that cannot be matched or paralleled anywhere else within or surrounding the city.
- 4.10 Its internationally renowned and iconic status/brand allows Belfast to compete with other cities (Ireland/UK/Europe) so as to attract vital inward investment on a national and international scale. Indeed, examples of TQ's proven track record include the following:
- HBO (Game of Thrones);
 - Citij;
 - Microsoft (plus other science park tenants); and
 - 'Titanic Belfast' brand.
- 4.11 In addition, TQ can maximise the opportunities available to Belfast by creating employment, tackling deprivation and catalysing social cohesion, and making Belfast a destination of choice in the rapidly expanding global tourist industry. TQ can perform an essential role in growing the centre city and enhancing its economic, environmental, social and cultural offer.
- 4.12 In essence, this submission draws attention to a single policy proposition that TQ (including the Belfast Waterfront) performs a fundamental and complementary role to the traditional City Centre of Belfast. It is pivotal to:
- the current re-branding of the city;
 - drawing people to Belfast to live work and play - locally and internationally;
 - attracting inward investment and creating significant employment; and
 - performing as a principal driver for sustainable citywide growth.
- 4.13 This complementary role must be recognised and promoted in the DPS, which is tasked with defining the Council's objectives in relation to the development and use of land in

its district and the strategic policies to implement these objectives, to ensure the city's future development as a modern, competitive European city with a strong economy and quality of life for all of its citizens.

- 4.14 Ultimately, any plan for the city which does not recognise the importance of, and enable the growth of, TQ, in policy terms, is not a 'sound' plan. The DPS, in its current form, will unnecessarily restrict growth and development at TQ and should be amended to ensure that this invaluable asset is given the full opportunity to continue to strengthen and deliver for the City of Belfast.
- 4.15 We submit that TQ can do for Belfast what Media City and Dublin Docklands SDZ do for Manchester City and Dublin City, respectively (see Appendix 5 for further details on these case studies):
- Media City – Manchester City;
 - Docklands SDZ – Dublin ⁵
- 4.16 It could be argued that as a minimum, Titanic Quarter performs a complementary role and, as a maximum, it performs as an extension of certain city centre functions (e.g. as a location for offices, the primary tourism destination, promoting city living, accommodating a main further education provider and central administrative functions – i.e. PRONI).

⁵ This SDZ has been so successful for Dublin that the Irish Government, in May 2016, designated Poolbeg West a SDZ so as to expand the development opportunity of the docklands area in Dublin

5. Vision, Aims & Objectives

5.1 Our client is supportive of the following ambitious vision set out within the DPS:

'In 2035, Belfast will be a globally successful, smart regional city that is environmentally resilient with a vibrant economic and social heart. As a centre of learning and business, the knowledge economy flourishes where collaboration and innovation attracts investment, talent and jobs. We will value and conserve our unique natural and built heritage to enhance and develop tourism.

Thriving socially inclusive well connected neighbourhoods, that encourage a healthy active lifestyle with well-designed homes where people love to live. A strong, inclusive local economy will support progressive, safe and vibrant communities. The city will provide a gateway to opportunities locally, nationally and worldwide'.

5.2 However, our client submits that the DPS must be amended in line with the modifications sought within and throughout this submission, if it is to deliver upon the LDP DPS vision.

5.3 The evidence for supporting this position is set out within the entirety of this submission and its accompanying appendices, which elucidate the need to include the Titanic Quarter within the City Centre boundary noting the distinct benefits associated with doing so and complementary role that the Titanic Quarter can deliver for the City Centre.

5.4 The role and function of TQ is compatible with and typical of what you would find in a city centre on the basis that the:

- it includes uses that perform a support role for city growth (e.g. housing, hotels & conferencing facilities, employment, education, national headquarters (PRONI) and leisure)
- it is a destination for international visitors, providing a sequence of tourist assets, including HMS Caroline, Titanic Belfast, SS Nomadic at Hamilton Dock and the Titanic Hotel Belfast in the former Harland and Wolff Headquarters and Drawing Offices; and
- city strategies and city vision recognise the role TQ plays, in the BCCRIS and the Belfast Agenda.

5.5 Furthermore, having reviewed the aims and objectives set out within this section of the DPS, it is considered that inclusion of TQ within the City Centre will be compatible with or at least help Belfast to achieve each of the aims and objectives identified.

5.6 We respectfully submit that until this happens, the current vision, while ambitious, is not realistic, and so does not satisfy soundness tests CE2 and CE4.

6. Spatial Development Strategy

Introduction

- 6.1 This section of the submission makes a conjoined representation on the following policies:
- SD2 - Settlement areas; and
 - SD3 - City Centre.
- 6.2 We note that guidance published by the Department and the Planning Appeals Commission advises that a separate representation should be submitted for each component of the DPS for which a change is sought. However, we consider, for the purposes of this submission, that Policies SD2 and SD3 are overlapping policies and so it is prudent to address these policies concurrently.

DPS Policy Context

- 6.3 Policy 'SD2 – Settlement Area' defines 8 settlement areas and Figure 6.2 illustrates the general location of these settlement areas, albeit at a difficult scale and with a crude method of identification. Nevertheless, it seems that the Titanic Quarter is located outside the City Centre but within the Belfast Harbour Area. It is noted that the Odyssey Arena and associated parking, which is located immediately adjacent TQ (to the south), appears to be within the City Centre boundary.
- 6.4 Policy SD2 then provides a description and context for each of the 8 settlement areas under their respective subheadings. Paragraph 6.2.11 confirms that the Belfast Harbour Area has begun to '*...adapt to the changing economic climate, diversifying through the Science Park and North Foreshore developments offering employment in clean-tech and high-tech sectors*'.
- 6.5 In terms of the Titanic Quarter, Paragraph 6.2.11 of the DPS recognises that its regeneration '*...has also helped establish the harbour estate as a **major tourist destination** and has **introduced a more diverse range of uses, including office accommodation, apartments, retail, and education facilities***' (our emphasis).
- 6.6 Policy 'SD3 – City Centre' advises that '*The council will support new economic and residential development to create a compact and vibrant city centre*'. It further adds that new development will be directed towards development opportunities located within four broad areas. Figure 6.3 identifies the general location of these opportunity areas, again at a difficult scale and with a crude method of identification. Again, TQ appears to be located out with the important development opportunity areas.
- 6.7 It is noted that the Waterfront District appears to be the closest district to TQ and the DPS states that this district '*...provides the **opportunity to extend the city centre eastwards to better activate the river Lagan. It is within walking distance of the city core and the opportunity exists to take advantage of the **waterside location for comprehensive mixed-use regeneration**. The creation of a new Waterside District to***

animate the riverfront will provide a valuable amenity for business users, residents and visitors'.

Soundness Tests

6.8 We consider that the abovementioned proposed policies, in their current form, fail the following soundness tests:

- C1, C4, CE2 and CE4.

Modification Sought

6.9 To ensure that the DPS can be considered a 'sound' plan, we respectfully request that the Council:

- includes Titanic Quarter within the City Centre boundary; and
- identify Titanic Quarter as a development opportunity area.

Rationale

6.10 This submission, in its entirety (including the accompanying appendices), clearly sets out the complementary role that TQ provides for the City of Belfast and the vital contribution that it has made, and indeed continues to make, to the success of the city to the benefit of all residents, businesses, business users, visitors and tourists.

6.11 It is noted that the DPS, at Paragraph 6.2.11 (as quoted above), clearly recognises TQ's important contribution, and this contribution is again reinforced by Paragraph 8.1.46 of the DPS, which states:

*'There are a number of examples within Belfast of [Higher Education Institutes] contributing to the **growth of the economy and the wider regeneration of the city**. For example, the **Belfast Metropolitan College's new Titanic Quarter campus** has aided regeneration of the city waterfront area, whilst the e3 campus in west Belfast is dedicated to enterprise, employability and economic development. **The Catalyst Inc. innovation hub** (formerly Northern Ireland Science Park) is also located within the **Titanic Quarter**, providing support for **innovation-led, high-growth; knowledge based businesses and provides links with the universities, colleges and research centres**' (our emphasis).*

6.12 In terms of the Waterside district, the DPS points to the positives associated with this district, which can be summarised as follows:

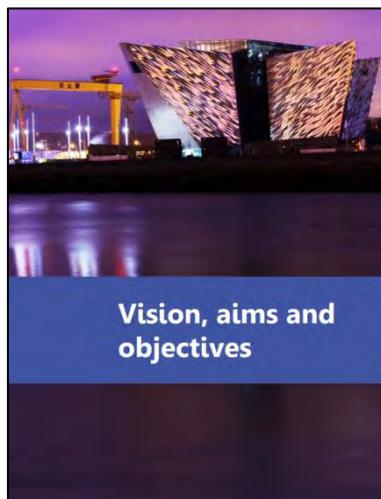
- walkable location;
- can accommodate comprehensive mixed-use regeneration;
- opportunity to extend city centre eastwards to better activate the river Lagan; and

- creation of a new Waterside District to animate the riverfront will provide a valuable amenity for business users, residents and visitors.
- 6.13 We submit that regeneration of TQ satisfies each and all of these elements and that this is further rationale which supports our requested modifications.
- 6.14 Additionally, another useful Council resource, in terms of understanding TQ's importance for and its contributions to, the City of Belfast, and indeed the wider Northern Ireland region, is the Belfast City Centre Regeneration and Investment Strategy (BCCRIS), published in 2015.
- 6.15 We note that this strategy, which sets out the Council's collective ambition for the continued growth and regeneration of the city core and its surrounding areas to 2030, is referred to and recognised within the DPS in its Policy Context section.
- 6.16 Additionally, we note that the BCCRIS is recognised and referred to within the 'City Development' priority of Belfast's Community Plan, which is entitled The Belfast Agenda. We note that under the subheading 'Deliver City Regeneration and Investment Projects', the Community Plan states that '*We are committed to encouraging city centre living and creating a vibrant, well-connected environment for people to enjoy*'. The Community Plan then follows this up by setting out that '*the City Centre Regeneration and Investment Strategy already stands as an example of our shared ambition - jointly adopted by the council and the Department for Communities*'.
- 6.17 This context is important to note as it demonstrates that the BCCRIS is a document which the Council should take account of when preparing its DPS, in accordance with Section 8 (5) of the Planning Act (Northern Ireland) 2011 (i.e. soundness tests C2 and C4).
- 6.18 So far as the BCCRIS is concerned, we note that Section 2 Context, states, that '*This strategy takes a larger view of what constitutes Belfast City Centre than has typically been used. A **city centre is partly defined by its functions**, and in Belfast today **city centre functions take place not only in the traditional core inside** the bounds of the River Lagan, Westlink and M3, **but also in City Quays and Titanic Quarter***' (our emphasis).
- 6.19 Furthermore, under the Lagan Corridor, that '*It is all the more important that the River Lagan receives proper treatment because **it is no longer the edge of the city centre***' (our emphasis). The BCCRIS, in the same breath, then acknowledges that '***Significant development has taken place in Titanic Quarter over the past 10 years**, including the introduction of Belfast's biggest tourist attraction, Titanic Belfast, as well as hotels, apartments, Titanic Studios, Belfast Metropolitan College's Titanic Quarter Campus and the Northern Ireland Science Park*' (our emphasis).
- 6.20 The BCCRIS advises that this '*...has resulted in Titanic Quarter **playing a significant employment** (in terms of providing choice to occupiers), **tourism and accommodation role in the City***' and that the '***Titanic Quarter is also a key site for Grade A office space***' (our emphasis).

- 6.21 The BCCRIS envisages increasing city centre living as being ‘...essential to the health and vibrancy of Belfast City Centre and experience from other cities has shown that waterfronts are a prime location for residential development’. In light of this, it identifies sites along the River Lagan for residential development, including the Titanic Quarter.
- 6.22 We note that the BCCRIS states that ‘Despite being relatively close to City Hall, emerging development areas such as Titanic Quarter and City Quays feel beyond walking distance due to these barriers. In addition, the BCCRIS also states that ‘There are however still too many places that feel too far away, notably the east bank of the Lagan, the northern end of the city centre, City Quays, Titanic Quarter and the surrounding communities, most of which have to be reached after crossing a motorway or rail barrier’.
- 6.23 However, since the publication of the BCCRIS, it is noted that the following infrastructural improvements have been delivered which make Titanic Quarter considerably more closer to, and connected with, the City Centre:
- Lagan Weir Footbridge and Cycleway – completed in 2015;
 - BelfastBikes with 2 dedicated stations at TQ (i.e. at Catalyst Inc and Belfast Met) and it is noted that an additional station is located at the Odyssey – installed in December 2015; and
 - Belfast Rapid Transit (i.e. glider) with a dedicated halt at TQ and a dedicated route to/from City Centre to/from TQ – operational from September 2018.
- 6.24 Success of the BelfastBikes initiative is well reported and we note the Council published a press release on its website (in December 2015) which reproduces comments made by Kerrie Sweeney (Titanic Foundation Chief Executive)⁶, as follows:
- ‘The Coca-Cola Zero Belfast Bike scheme is an ***important step in connecting Titanic Quarter with the rest of Belfast.***’ (our emphasis)
 - ‘The scheme will benefit hundreds of Titanic Quarter workers, students and residents, and most important, it will ensure ***our unique attractions*** such as Titanic Belfast, SS Nomadic, Slipways and Titanic’s Dock and Pumphouse ***are easily accessible for visitors and local people across the city.***’ (our emphasis)
 - ‘We believe the hub in Titanic Quarter will also ***encourage*** some of the million plus ***visitors who come to Titanic Quarter every year to explore other parts of the city, staying longer and spending more across Belfast.***’ (our emphasis)
- 6.25 Commencement of the Glider service at TQ has transformed connectivity with the City Centre as it provides a high quality experience, with improved frequency with a more efficient route (i.e. reduced quantum of stops) and introduces a weekend service.

⁶ <http://www.belfastcity.gov.uk/News/News-58496.aspx>

- 6.26 The importance of the Titanic Quarter for Belfast and its iconic status is ironically epitomised by the covering page of the Vision, Aims and Objectives section of the DPS, as reproduced below. Indeed, it is not surprising that Titanic Belfast adorns the front cover page of this integral section of the DPS, particularly noting that it was named the world's number one tourist attraction in 2016⁷.
- 6.27 TQ's synonymy with Belfast City Centre is further reinforced by the DPS summary consultation document published alongside the DPS by BCC, particularly page 6, entitled 'How will we grow Belfast', which is reproduced below and with the vacant lands at TQ centrally positioned.



- 6.28 The approach proposed in the DPS would unnecessarily restrict investment in a sustainable, accessible, attractive and complementary location in the City of Belfast which would have a detrimental effect on the overall success of the city by preventing TQ from evolving and realising its full potential. Thus, the exclusion of TQ from the City Centre boundary/development opportunities, as proposed in the DPS, is unexplainable, unfounded and unsound.
- 6.29 If the Council is truly serious about promoting Belfast as a global city then it needs to fully recognise, embrace, celebrate and enable TQ by elevating it within, and providing it with, planning policy status. This approach will ensure that TQ is given the policy support needed to ensure that it can continue to grow, diversify and evolve so as to benefit the City of Belfast and the wider Northern Ireland economy.
- 6.30 It is self-evident, noting the content of this submission, in its entirety, that the requested modifications will better enable the Council to deliver on its vision, aims, and objectives, which is a key consideration of the 'soundness' test.

⁷ Belfast's Community Plan entitled The Belfast Agenda - Your Future City – pg. 18

7. Shaping a Living Place

Introduction

- 7.1 This section of the submission makes a separate representation on each of the following policies:
- HOU4 – Density of residential development;
 - DES3 – Tall Buildings;
 - HOU5 – Affordable Housing; and
 - HOU6 – Housing Mix.
- 7.2 We note that DES3 comes after HOU5 and HOU6 in the DPS, however, as HOU4 and DES3 are linked, we consider it important to address it immediately after HOU4.

Density of Residential Development (Policy HOU4)

DPS Policy Context

- 7.3 The SPSS notes within Section 6.137 that *'higher density housing developments should be promoted in town and city centres and in other locations that benefit from high accessibility to public transport facilities.'*
- 7.4 The SPSS also requires measures to be included in development plans, including the need to *'set density levels for housing sites appropriate to the location of the site and the character of the surrounding area'*.
- 7.5 HOU4 sets out density ranges for new developments across Belfast. The opening sentence of the policy sets out a positive stance in that planning permission will be granted for residential developments which are brought forward in accordance with the following density bands. The latter part of the policy text directs that the density bands are to be used as a guide to inform proposed developments

Is it sound?

- 7.6 The policy fails to satisfy the test of CE2 in that:
- (a) The policy is not founded on evidence which demonstrates that the density ranges are realistic and achievable having taken account of other policies within the draft Plan Strategy, in particular policy RD1.
 - (b) No evidence has been provided to test whether or not the proposed density bands will help deliver the Council's housing ambition as set out in Policy SP1 and HOU1.
 - (c) The density bands, prescribe a density of development that is inconsistent with the planning context (including the TQ Development Framework (as amended) and the Concept Masterplan and Design Principles documents) and the already

approved and completed developments in Titanic Quarter, along the East Bank - see Table 7.1 below.

Table 7.1: Completed and Approved Schemes in TQ

Development	Status	Height	Density – dwellings per hectare	Accordance with proposed density band (dwellings per hectare)	Proposed Settlement / character area (HOU 4)
Completed schemes or currently under construction					
Titanic Quarter - ARC Residential Apartments	Complete	12 storeys	1.3ha 474 units 364dph	No	City Corridor
Portland 88	Planning permission granted (under construction)	8 storeys	0.2 88 440dph	No	City Centre
35 - 41 Queens Square, Belfast	Under construction	16 storeys	0.034 60 1,764dph	Yes on the basis that it would be classified a 'tall building'	City Centre
14-18 Montgomery Street	Planning permission granted (under construction)	14 storeys	0.026 38 units 1,461dph	Yes on the basis that it would be classified a 'tall building'	City Centre
Approved (either Planning Permission or Masterplan)					
Titanic Quarter – Block 1	Planning permission granted	30 storeys	0.29ha 350 1,206dph	No	City Corridor
Queens Quay DSD Masterplan site	On-hold	19 storeys	0.12 ha 278 units 2,316dph	No	Belfast City Centre
Academy Street	Pending (approved at Committee subject to S76)	16 storeys	0.06 90 units 1,500dph	Yes on the basis that it would be classified a 'tall building'	City Centre

- (d) The Belfast Harbour area is not identified as a Settlement / character area although it is identified in Policy SD2 and Figure 7.3.

- (e) There is a tension within the policy. The opening paragraph jars with the final paragraph insofar as the opening paragraph directs that development proposals should accord with the density bands, but later it states that the density ranges are guide.
- (f) The position set out for Tall Buildings within the Density Table is at odds with the Tall Buildings policy (DES3). The table notes that the location of tall buildings within the city centre will be identified. This is not the position set out within DES3. DES3 makes no reference to a locational based policy. Rather, that the policy will apply to buildings over 35 metres AOD or those which are significantly higher than their surroundings and such buildings will be assessed against a criterion based assessment.

Modifications Sought

- 7.7 Whilst we welcome that the density bands are to be used as a 'guide' to inform proposed developments and development proposals outside of these broad bands will be considered on their merits we feel there should be an exception for major regeneration/masterplan sites including those with a waterfront location.
- 7.8 We would support the policy being reworded to read:

'An increase in the density of housing and mixed use developments will be promoted in town and city centres and other locations which benefit from high accessibility to public transport facilities and major regeneration/masterplan sites including those with a waterfront location.'
- 7.9 In the absence of evidence to support the density bands set out in policy, this information should be moved to the Local Policies Plan (LPP) and clearly identified as a guide.
- 7.10 Finally, there needs to be greater clarity in the identification of tall buildings within the city centre as there is no reference to the identification of sites in DES3.

Tall Buildings (Policy DES3)

DPS Policy Context

7.11 DES 3 Tall Buildings is a specific policy to be used in the assessment of tall buildings within the Council area. The policy is founded on a gateway test in that only proposals over 35 metres AOD or those which are significantly higher than their surroundings will be assessed against the policy provisions which are a criteria based assessment.

Is it sound?

7.12 The policy fails to satisfy the test of CE2 in that:

- The policy is at odds with HOU 4 as the density ranges of the policy jar with the policy provisions of DES 3 (refer to para 7.6 above).
- There is tension between the policy and its supporting technical supplements which suggest that further policies may be through forward at Local Plan Policies stage based on clusters.
- The policy is founded on analysis which considers some but not all extant planning permissions.

7.13 Analysis undertaken to inform Council policy for tall buildings involved a study of city centre applications for taller buildings in the period of 2011 to the present day. It was concluded that taller buildings of above 9 or 10 storeys (approx. 35m) were more apparent and it was therefore concluded that 35m would be an appropriate threshold.

7.14 We submit that this analysis should have:

- (a) analysed other planning permissions and guidance (including the Agreed TQ Development Framework) outside of the BMAP city centre boundary; and
- (b) considered all extant planning permissions in the city centre (see Appendix 6).

Table 7.2: Committed Schemes not considered

Development	Status	Height
Queen Street – Student Scheme	Complete	13 storeys
G5 Office Development	Approved	14 storeys
Odyssey, Queens Quay	Approved	Up to 28 storeys
City Quays	Approved	Up to 16 storeys
Sirocco Quays	Approved	Up to 20 storeys

7.15 On the basis that (a) and (b) have not been undertaken we consider the threshold of 35m AOD is unsound.

- 7.16 VU.CITY was also used to test the threshold of 35mOD and identify clusters and emerging clusters. This additional analysis considers some but not all existing, committed and implemented schemes and therefore we also consider it unsound. Without considering these schemes, which are greater than 35mOD, we would disagree with the identification of the clusters and emerging clusters.
- 7.17 The policy text within the draft Plan Strategy makes no reference to any locational based assessment in the future, however, information detailed in technical supplement 6 - Urban Design & Built Heritage (page 14) states that within these broad clusters (as shown in Appendix 2) further detailed analysis will be carried out during the local policies stage of the LDP. Clarification is sought as to whether there is an intention to identify clusters or locations for tall buildings to be developed.

Soundness Tests

- 7.18 Whilst we are supportive of criteria based policy there is insufficient evidence in the Sustainability Appraisal which tested reasonable tall building policies. We would ask the Council to formulate an evidence base to address this policy, and having done so reassess whether there is sufficient evidence to support the policy.
- 7.19 We consider that the abovementioned proposed policy, in its current form, fails soundness tests CE2 and CE4.

Modifications Sought – DES3

- 7.20 TQL supports the assessment on a case by case basis. In respect of the criteria based policy we have set out below our proposed modifications.
- (a) We are not supportive of setting guideline heights and based on the analysis undertaken we recommend that the threshold of 35m AOD is revisited and the text *‘those which are significantly higher than their surroundings’* is dropped as there is no evidence base for this.
- (b) Criteria identified under proposed Policy DES3 are unsound as they do not read across other policies in the plan, specifically those set out in the Built Heritage section .
- (c) Replace *‘Contribute to a cluster or an interesting skyline when grouped together’* with *‘Contribute to a cluster or create a focal point or beacon (a Point Block) which acts as a form of marker contributing to a positive skyline.’* As drafted there is a conflict in respect of the clustering and grouping and assessing each application on its own merits. Individually, or in groups, tall buildings can affect the image and identity of the city. Para 3.4 of the Technical Supplement 06 states that *‘Tall buildings are generally easily recognisable and act as key landmarks within a city’s skyline either individually or as a cluster.’ (our emphasis)*
- (d) Replace *‘Support locations of civic or visual importance including major transport nodes, civic spaces and areas of high employment’* with *‘Support locations of civic or visual importance including major transport nodes, civic spaces, areas of high employment, at arrival points into the city, waterfront and areas of regeneration including those identified as Development Opportunity Sites and masterplans’*

Consideration should be given to including criteria in DES3 that *'regard should be had to extant masterplans/frameworks or extant planning permissions whereby locations for taller buildings are identified or approved...'*.

- (e) Add *'will bring significant regeneration benefits and contribute positively to place-making'* similar to other UK cities it should be acknowledged that taller buildings can act as catalysts for wider regeneration. Skylines of cities such as Manchester, Leeds, Liverpool and Birmingham act as markers and signposts of regeneration.
- (f) Remove *'Existing tall buildings within Belfast will not set a policy precedent for similar development on adjacent sites.'* This is unsound because it is an invitation to set aside an assessment of context and character, factors which are genuine and important material considerations in making a planning decision within the new policy framework. The PAC decision (ref: 2013/A0124) is of particular relevance.

7.21 In addition to the above, we would recommend that further consideration is given to the following:

- Promotion of well-designed and high architectural quality tall buildings.
- Ensure the merits of new taller 'iconic' buildings next to buildings of architectural and historic interest is considered. Two types of architecture (both the old and the new) sitting side by side can positively co-exist, as evidence by Titanic Belfast and the Titanic Hotel) and it is important to recognise the merits of new taller 'iconic' buildings next to buildings of architectural and historic interest.
- Resolve conflict between policies HOU4 and DES3, specifically the reference to the tall buildings in the city centre and 'locations to be identified'. There is no reference in DES4 that tall building locations will be identified which conflicts with HOU4.

7.22 We disagree with the requirement for applications to be accompanied by a tall building design statement. The consideration of a tall building is normally set out in a Design and Access Statement, Concept Masterplan (if applicable), Townscape and Landscape Visual Impact Assessment and other technical assessments e.g. Daylight and Sunlight, Wind etc.

7.23 Finally, if the Council intends to introduce a locational based assessment for tall buildings that evidence to support this change is provided.

Rationale

7.24 As set out in Section 1 of the Historic England's Tall Buildings Historic England Advice Note 4 "Towns and cities evolve, as do their skylines". Identifying the role and contribution of tall building(s) as part of an overall vision of a place is important.

7.25 To accommodate the expected growth in population, including 31,000 additional people and other growth needs within the lifetime of the Plan, the city should allow for the appropriate construction of higher and denser buildings. The importance of going

upwards has been brought to the fore in the south of Ireland with the publication of the draft guidelines by the Department of Housing, Planning and Local Government on building heights. The purpose of the guidelines is to *'Secure better and more compact forms of future development. This is for the benefit of our economy, our environment and most of all, our citizens. Our cities and our towns must grow upwards, not just outwards, if we are to meet the many challenges ahead'* (our emphasis).

- 7.26 Allowing for taller buildings does not mean that Belfast will become a city dominated by skyscrapers or that the unique historical architectural character of Belfast will be lost. Rather, it will allow for projects that will meet the needs of the future whilst adding 'positively' to the city's skyline like many other cities in UK, Ireland and beyond.
- 7.27 The council needs to be flexible and to be able to respond to changing economic conditions.

Affordable Housing (Policy HOU5)

DPS Policy Context

7.28 The council's proposed policy for securing affordable housing states that:

"Planning permission will be granted for residential development on sites greater than 0.1 hectares and/or containing 5 or more dwelling units where a minimum of 20% of units are provided as affordable."

7.29 The draft policy proceeds to clarify that:

- Affordable housing will comprise social and/or intermediate housing
- The size, type and tenure of provision will be determined by an up to date analysis of demand.
- A tenure blind approach is proposed;
- Where it can be demonstrated that it is not sustainable or viable for a proposal to meet the requirements, Council will consider suitable alternatives on a case-by-case basis;
- Provision will be secured via a Section 76 Legal Agreement;

7.30 The justification and amplification text proposed goes on to set out that:

- The 20% requirement is a minimum and the council could seek more where it is considered necessary and viable. Where it is, then the applicant will be required to provide the relevant amount. This will be secured through key site requirements.
- Council will seek to secure the affordable housing element through the use of a Section 76 Agreement.
- Affordable Housing is defined as social rented housing and intermediate housing.
- Intermediate housing is currently defined as shared ownership housing product provided by registered housing associations. It is acknowledged that other intermediate products do exist.
- Viability assessments will be required where an applicant is proposing to provide less than the policy requirement.

7.31 It is intended that Policy HOU5 as proposed will assist the Council in delivering the social objectives set out in the Plan Strategy.

Tests of Soundness

7.32 The intention of the policy is welcomed and the thrust of what it is seeking to achieve is in alignment with the RDS and the SPPS. However, it is considered that proposed policy HOU5, in its current form, fails the following tests of soundness:

- The proposed threshold approach does not fully align with the approach set out in the SPPS (soundness test C3);
- The proposed approach does not align with the Council’s own evidence base (soundness test CE2);
- A more robust evidence base is required (soundness test CE2);
- The proposed approach will not be effective as it does not reflect the mechanisms for the provision of social and intermediate housing in Northern Ireland (soundness test CE2 and CE3);
- It has not been demonstrated that the policy is coherent with other policies proposed (soundness test CE1).

Modification Sought

7.33 To ensure that the DPS can be considered ‘sound’, we respectfully request that the Council note and take action on the following recommendations:

- Caution should be taken when applying an affordable housing requirement across all residential sites as not all locations will have a social housing need;
- When applying a threshold approach to affordable housing provision the council should consider carefully the existing mechanisms for the delivery of social housing;
- Key site requirements seeking social or intermediate housing should be based on detailed and up to date housing need;
- The Council should ensure that their evidence base has assessed the need for both social and intermediate housing, both of which are currently provided by housing associations;
- Policy proposals should be flexible to adopt to site specific characteristics and ensure deliverability of housing;
- Policy wording should be flexible to adapt to changes over time, particularly in relation to the delivery of different affordable housing products; and
- Policy requirements for the design of residential development should be based on a robust assessment of need.

7.34 Finally, Councils should pro-actively engage, early in the plan-making process, with the housing sector and in particular the housing associations and developers responsible for the delivery of housing in order to better understand the operational realities of delivering development and the unintended consequences flowing from proposed policies.

7.35 TQ is committed to engaging with the Council to ensure that a workable affordable housing policy can be delivered through the DPS, and would welcome the opportunity to discuss this aspect of the DPS in further detail.

Rationale

- 7.36 It is considered that the Council's evidence for underpinning proposed Policy HOU5 needs to be fortified and we also note the following:
- SPPS highlights at Footnote 42 that the Department are currently undertaking research into a regional policy approach for affordable housing - until such time as a regional approach is agreed, it cannot be demonstrated that the local policy has robustly considered all relevant regional policy;
 - BCC, in Technical Supplement 2 – Housing (August 2018) (which forms part of the evidence base for Policy HOU5) alludes to the Developer Contributions for Affordable Housing framework which was published for consultation by DSD in 2015 – the proposed policy is reliant upon a document which is subject to objection and has not been the subject of a thorough assessment and is not policy
 - the Developer Contributions for Affordable Housing framework does not reflect the current and most up to date position and reliance on evidence within the draft framework should be undertaken with caution
- 7.37 It is recommended that the Council undertakes its own assessment of affordable housing to reflect the baseline and future requirements for Belfast City and it should also include a robust assessment of the various thresholds for provision.

Housing Mix (Policy HOU6)

DPS Policy Context

- 7.38 HOU 6 sets out that planning permission will be granted for new residential development on sites greater than 0.1 ha and /or containing 5 units or more where the proposed development provides a suitable mix of house types and sizes to promote choice and assist in meeting community needs.
- 7.39 Specific reference is made to providing smaller homes across all tenures to meet future household requirements. The policy clearly directs that the exact mix of house types and sizes will be negotiated with developers on a case by case basis.

Soundness Tests

- 7.40 The policy fails to satisfy the tests of Soundness in that:
- It has not been demonstrated that the policy is coherent with other proposed residential and design policies (soundness test CE1).
 - The policy is not founded on evidence which demonstrates how Council has tested the viability implications arising from the policy (soundness test CE2).

Modification Sought

- 7.41 The policy should be deleted as it duplicates provisions already set out in HOU 5 and places unnecessary restrictions on private housing developers.

Rationale

- 7.42 Council has published a number of evidence base documents in support of their proposed policies in the Draft Plan Strategy, including:
- Size and Type of Housing Needed (December 2017); and
 - Housing Market Analysis Update (September 2017).
- 7.43 It is important to note that within the Size and Type of Housing Need report it clearly states that a housing mix policy should not be applied on a site by site basis, as there needs to be flexibility to respond to the local market context, viability, demand and local market need (paragraph 3.3, page 15).
- 7.44 Notwithstanding the above, we have concerns that information regarding housing need are set out in the Housing Needs Assessment prepared by the NIHE. This is specific to social rented housing and does not provide any justification for the type of houses which should be developed by private developers.
- 7.45 There are a number of ways that mixed tenure developments can be delivered. Housing Associations themselves could develop mixed tenure schemes or they may, depending on scale and risk, want to work in partnership with private developers to deliver mixed tenure developments. In the latter instance, developers will want to deliver a housing product which is bespoke to that housing market area i.e. a product that home owners will want to buy. There is no evidence within the plan documents

which sets out how viability has been considered and justifies why the policy should be applied to all housing developments irrespective of tenure.

- 7.46 We fully support the intent behind the policy and acknowledge that the Strategic Planning Policy Statement (SPPS) advocates the need for a variety of house types and sizes and tenure to meet different needs in order to support balanced communities (page 70, SPPS). We disagree, however, with Council's approach on this aspect and contend that the issue of housing type and size should only apply to affordable housing (as defined within the SPPS) and be considered as an integral part of a revised version of HOU 5.

8. Creating a Vibrant Economy

Introduction

8.1 This section of the submission makes a separate representation on each of the following policies:

- EC2, EC3 and EC6 - Employment Land and Office Development
- CC1 - Development Opportunity Sites

Employment Land and Office Development (Policies EC2, EC3 and EC6)

8.2 As discussed within the introduction section, this submission is supported by a Belfast Office Needs Assessment, which has been jointly prepared by Turley Economics and CBRE.

8.3 The Belfast Office Needs Assessment is reproduced at Appendix 6 and relates to this section of the DPS, particularly proposed Policies EC2, EC3 and EC6.

8.4 Please refer to the Appendix 6 for all commentary, findings, and recommendations with respect to proposed Policies EC2, EC3 and EC6.

Development Opportunity Sites (Policy CC1)

DPS Policy Context

8.5 It is noted that the dark blue policy box for proposed Policy CC1 refers to 5 'development opportunity areas' which are then identified in Figure 8.4 entitled 'Existing City Centre Master Plan Areas'. The proposed policy states that *'The Council will support mixed use development within the development opportunity areas'* and that *'New developments shall be directed towards sites within the development opportunity areas'*.

Soundness Tests

8.6 We consider that the abovementioned proposed policies, in their current form, fail the following soundness tests:

- C1, C4, CE2 and CE4.

Modification Sought

8.7 Having reviewed proposed Policy CC1 and its accompanying Figure 8.4, we note that there is confusion in terms of the language used where proposed Policy CC1 refers to 'development opportunity areas' whereas Figure 8.4 refers to 'Masterplan Areas'. It would be helpful if the language was changed so that it is consistent and to avoid any confusion. Until this change is made, we will use the language contained in the DPS within this submission.

8.8 Furthermore, there is an inconsistency with respect to Titanic Quarter in that Figure 8.4 identifies it as one of the 'Masterplan Areas' (i.e. with a purple shading) but Policy CC1

does not refer to it in the list of 'development opportunity areas'. It is noted that all of the other 'Masterplan Areas' in Figure 8.4 are listed in proposed Policy CC1 as a 'development opportunity area'.

- 8.9 In light of this, we request that proposed Policy CC1 is amended to include reference to TQ as a 'development opportunity area' so that proposed Policy CC1 and Figure 8.4 are aligned. Additionally, we ask that Figure 8.4 is enlarged so that the full extent of TQ is identified as part of the site is currently cut off from view.
- 8.10 As the abovementioned modifications relate to inconsistencies in language and text errors, no evidence is required to support these amendments.
- 8.11 However, if the Council is of the opinion that the inconsistency towards TQ occurs within Figure 8.4, rather than the corresponding text, then we set out the relevant evidence below which supports our submission that the plan would be 'more sound' if proposed Policy CC1 was amended to include TQ as a 'development opportunity area' and that Figure 8.4 continues to identify TQ (the full extent of TQ) as a 'Masterplan Area'.

Rationale

- 8.12 The evidence required to support the modification sought emanates from the facts and understandings set out in Section 2 of this submission with respect to proposed Policies SD2 and SD3. Thus, to avoid duplication and unnecessary repetition we ask the reader to refer back to Section 2 of this submission.
- 8.13 In addition to the above, we also note the following:
- Point (b) of proposed Policy CC1 states that *'Master plans, urban design and landscaped frameworks, and developers' briefs, shall be prepared, and these shall be agreed by the council's Planning Service'* - TQ has an agreed Development Framework (as amended), Concept Masterplan (Phase 2 and 3) and Design Principles (for Phase 2) (i.e. a detailed masterplan) in place which were agreed with the planning authority;
 - Point (c) of proposed Policy CC1 states *'Master plans, urban design and landscaped frameworks, and developers' briefs, shall be required to demonstrate a comprehensive approach to the planning and regeneration of the development opportunity area, and shall be consistent with the LDP objectives and policies'* – TQ's Development Framework was originally designed and then modified in a manner which ensured that it would be consistent with the RDS and the LDP (i.e. BMAP) objectives and policies;
 - Point (d) of proposed Policy CC1 states that *'Development proposals shall be required to deliver the identified land uses, the design principles for quality buildings and the public realm for sites in the development opportunity areas'* – TQ is a design led regeneration area and it will continue to deliver developments that are of a high quality and commensurate with public realm areas and landscaping improvements consistent with the area's vision for a new urban quarter; and

- Point (e) of proposed Policy CC1 states that *'Developers shall support the delivery of new infrastructure required for the regeneration of the development opportunity areas. This will be secured through the use of planning conditions and section 76 planning agreements'* - Appendix 4 clearly identifies that TQL and BHC have supported regeneration of TQ by delivering essential infrastructure which has enabled regeneration of TQ while also connecting it with, and bringing it closer to, Belfast City Centre.

8.14 Taking into account the above points, and the information set out within the entirety of this submission, it is clear that the DPS needs to include TQ as a 'development opportunity area' to ensure 'soundness' of the plan.

9. Building a Smart Connected & Resilient Place

Introduction

9.1 This section of the submission makes a separate representation on each of the following policies:

- TRAN 8 - Car parking and servicing arrangements; and
- TRAN9 - Parking Standards within Area of Parking Restraint.

Car Parking and Servicing Arrangements (Policy TRAN 8)

DPS Policy Context

9.2 TRAN 8 requires development proposals to provide adequate provision for car parking and appropriate servicing arrangements, however the emphasis appears to be on allowing parking provision that will assist in reducing reliance on the private car in particular for commuting into the city.

9.3 The policy goes on to state that *'the precise amount of car parking for development proposals will be determined according to the specific characteristics of the development and its location having regard to the DfI's published standards or any reduction provided for in an area of parking restraint.'*

9.4 The policy further states that *'Beyond areas of parking restraint, a reduced level of parking provision may be acceptable in the following circumstances:*

- *Where demonstrated through a TA, it forms part of a package of measures to promote alternative transport modes;*
- *where the development is in a highly accessible location well served by public transport;*
- *where the development would benefit from spare capacity available in nearby public car parks or adjacent on street car parking;*
- *where shared car parking is a viable option; or*
- *where the exercise of flexibility would assist in the conservation of the built or natural heritage, would aid rural regeneration, facilitate a better quality of development or the beneficial re-use of an existing building.'*

9.5 The policy goes on to then state that *'proposals involving car parking in excess of the DfI's published standards will only be permitted in exceptional circumstances'*.

Soundness Tests

9.6 We consider that the abovementioned proposed policy, in its current form, fails the following soundness tests:

- C4 and CE2.

Modification Sought

9.7 To ensure that the DPS can be considered a 'sound' plan, we respectfully request that the Council:

- amends the wording of proposed Policy TRAN8 to acknowledge the importance of delivering a product that aligns with an occupier's site specific and operational requirements;
- amends wording of proposed Policy TRAN8 to include occupier/market requirements as one of the considerations that will be used to define '*an adequate provision for car parking*';
- amend wording of proposed Policy TRAN8 to include occupier/market requirements as an exceptional circumstance which will allow for parking in excess of DfI's published standards; and
- deletion of reference to 'DFI standards' and replacement with 'published standards'

Rationale

9.8 Technical Supplement 14, Transportation, states that the recommendations of the draft Car Parking Strategy have been used as evidence for drafting policies relating to car parking in the draft plan strategy. However, we note that recommendations from the Car Parking Strategy have not been published, nor has any recent analysis of parking demand within areas of parking restraint been provided.

Commercial Developments

9.9 As mentioned previously within this submission, Belfast City Council is seeking to attract major commercial investment and promote city centre living with ambitious targets outlined in: the Local Development Plan documents published to date; the Belfast Agenda; and the Belfast City Centre Regeneration and Investment Strategy.

9.10 We welcome the Council's intention to enable alternative modes of transport and fully appreciate that this approach will provide benefits with respect to the sustainability agenda. However, noting that Belfast is in competition with other cities (UK/Ireland/EU) in terms of attracting major commercial investment and to ensure that the DPS properly positions the city to continue to be attractive in the eyes of such investment, flexibility needs to be engrained within the DPS, particularly proposed Policy TRAN8.

9.11 TRAN8 refers to an '*adequate provision for car parking*' and it then states that '*The precise amount of car parking for development proposals will be determined according to the specific characteristics of the development and its location having regard to the DfI's published standards...*'.

9.12 While we note that these are important considerations, the DPS fails to acknowledge another important consideration, this being occupier/market requirements, which need to be satisfied to ensure that what is being proposed will in fact be delivered. Indeed, we would argue that this is the most important of all the considerations mentioned.

- 9.13 We note that it is difficult to determine what is to be regarded as *'an adequate provision of car parking'*, especially for the all-important speculative build component. However, to ensure that an appropriate degree of flexibility is built into the DPS, and to ensure that future development proposals can deliver an attractive product that aligns with the site specific and operational requirements of occupiers, then the DPS needs to include this component within its factors that will determine the *'precise amount of car parking'*.
- 9.14 In some instances, there may be a requirement to provide a higher level of car parking than what is currently provided for by TRAN8. Thus, to ensure certainty, and to help de-risk potential investment, further clarification with respect to the exceptional circumstances would be beneficial in terms of car parking in excess of DfI's published standards.
- 9.15 To this end, we respectfully request, at the very least, that the proposed policy includes acknowledgment that if occupier/market requirements dictate a higher parking provision then this is something that will satisfy the exceptional circumstances test set out within proposed Policy TRAN8.

Residential Developments

- 9.16 So far as the city living agenda is concerned, we note that the Belfast Agenda and emerging Belfast Local Development Plan 2035 aim to promote city centre living, with an objective of 8,000 new residential units to be delivered in the city centre over the plan period.
- 9.17 We welcome the current flexibility that TRAN8 provides in terms of enabling a reduction in standards where the application site is located in a highly accessible and sustainable location. We consider this flexibility to be vital in attracting new residential products and tenures to Belfast, such as *'Build to Rent'* and *'Purpose Built Managed Student Accommodation.'*
- 9.18 However, as mentioned above, we note the evidence base prepared to support the policy is not provided within the technical supplements and the recommendations following from Council's Car Parking Strategy (published in May 2018) have not been provided nor has any recent analysis of parking demand within areas of parking restraint.
- 9.19 Importantly, the Council's draft Belfast Parking Strategy and Action Plan suggests that *'the current parking standards for development within parking restraint should be re-examined in order to provide greater clarity by development type'*.
- 9.20 We note within TRAN 8 that car parking provision in development proposals should *'have regard'* to the DfI's published standards. If the Council is to encourage 8,000 new residential units in the city centre over the plan period, we contend that it is unrealistic to apply DfI's current standards, especially as DfI Roads currently do not accept *'zero parking'* proposals, except for some Purpose Built Managed Student Accommodation proposals.

- 9.21 For example, DfI Roads recently suggested a requirement for approximately 25-45 car parking spaces for a 90 unit residential development proposal located in a highly accessible location within the City Centre.
- 9.22 If this standard is applied across new residential proposals in the city centre, with no acceptance of a more flexible approach in sustainable locations, this will equate to a requirement of up to 3,600 additional car parking spaces to serve the City's 8,000 unit City Centre residential objective.
- 9.23 These spaces would need to be served by new multi-storey car parks (four of City Quays scale); additional surface car parking (36 acres/15ha @ 100 spaces per acre); or multiple levels of expensive basement car parking within the site of each proposal – none of which are likely to be deliverable.
- 9.24 Adoption of this approach would likely render city centre residential development unviable. This approach is obviously unsustainable and does not align with the Council's desire to reduce reliance on the private car and a change in travel behaviour in Belfast City Centre. Indeed, it goes to the heart of the deliverability of the Belfast Agenda as expressed in the DPS.
- 9.25 Consideration should also be given to available planning guidance, not just DfI published standards, such as *Creating Places*, which states that;
- 'car free' developments will be considered appropriate if it is demonstrated that household will not own a car or will keep it elsewhere.'*
- 9.26 There should be sufficient flexibility in policy/guidance to allow both reductions (including zero parking proposals) and parking in excess of standards (e.g. commercial development which requires a higher level of operational parking), where other material considerations are at play.

Parking Standards within Areas of Parking Restraint (Policy TRAN9)

DPS Policy Context

9.27 TRAN9 sets out the parking standards within areas of parking restraint for residential and non-residential developments.

Soundness Tests

9.28 4.2 The policy fails to satisfy the test of CE2 in that:

- The evidence base prepared to support the policy is not provided within the technical supplements and the recommendations following from Council's Car Parking Strategy (published in May 2018) have not been provided.

Modification Sought

9.29 We respectfully suggest that Council prepares an up to date evidence basis to support this policy and on the basis of the evidence collated reassesses whether the evidence supports this policy position.

Rationale

9.30 We fully support a reduced level of car parking within areas of parking restraint and welcome the evidence basis for this policy being revaluated. We note that technical supplement 14 acknowledges that:

The draft Plan Strategy has been developed in the absence of an up to date transport plan for the city, however it makes reference to the Department's extant transport plan (BMTP) within the transport policy section (page 19, paragraph 4.3).

9.31 Information on the approach taken to formulate the car parking policies largely flows from Council's Car Parking Strategy (published in May 2018). This document has not been identified as part of the evidence basis, but can be located on Council's website. Paragraph 2.46 of Technical Supplement 14 notes that the Car Parking strategy has informed the development of policies in the draft plan strategy relating to transport and car parking. Paragraph 3.30 goes on to say that the recommendations from the parking strategy have been used as evidence for drafting policies relating to car parking in the draft plan strategy.

9.32 We note in the recommendations from the Car Parking Strategy that further study of parking demand is required and to inform car parking policy.

10. Recommendations

- 10.1 Section 10(2) of the Planning Act (Northern Ireland) 2011 advises that the Council must not submit a plan to the Department unless it has complied with any relevant requirements contained in regulations and it thinks the document is ready for independent examination.
- 10.2 Noting the evidence, findings and commentary set out within this submission, we respectfully request Belfast City Council to not submit the DPS to the Department in its current form as we have serious concerns about its ‘soundness’.
- 10.3 The identified gaps in information severely prejudice the entire Local Development Plan (LDP) process and the Council’s ability to formulate a sound and lawful local development plan.
- 10.4 We summarise below the modifications sought to ensure that the DPS can be considered sound and the related soundness tests which the policies, in their current form, fail to satisfy:

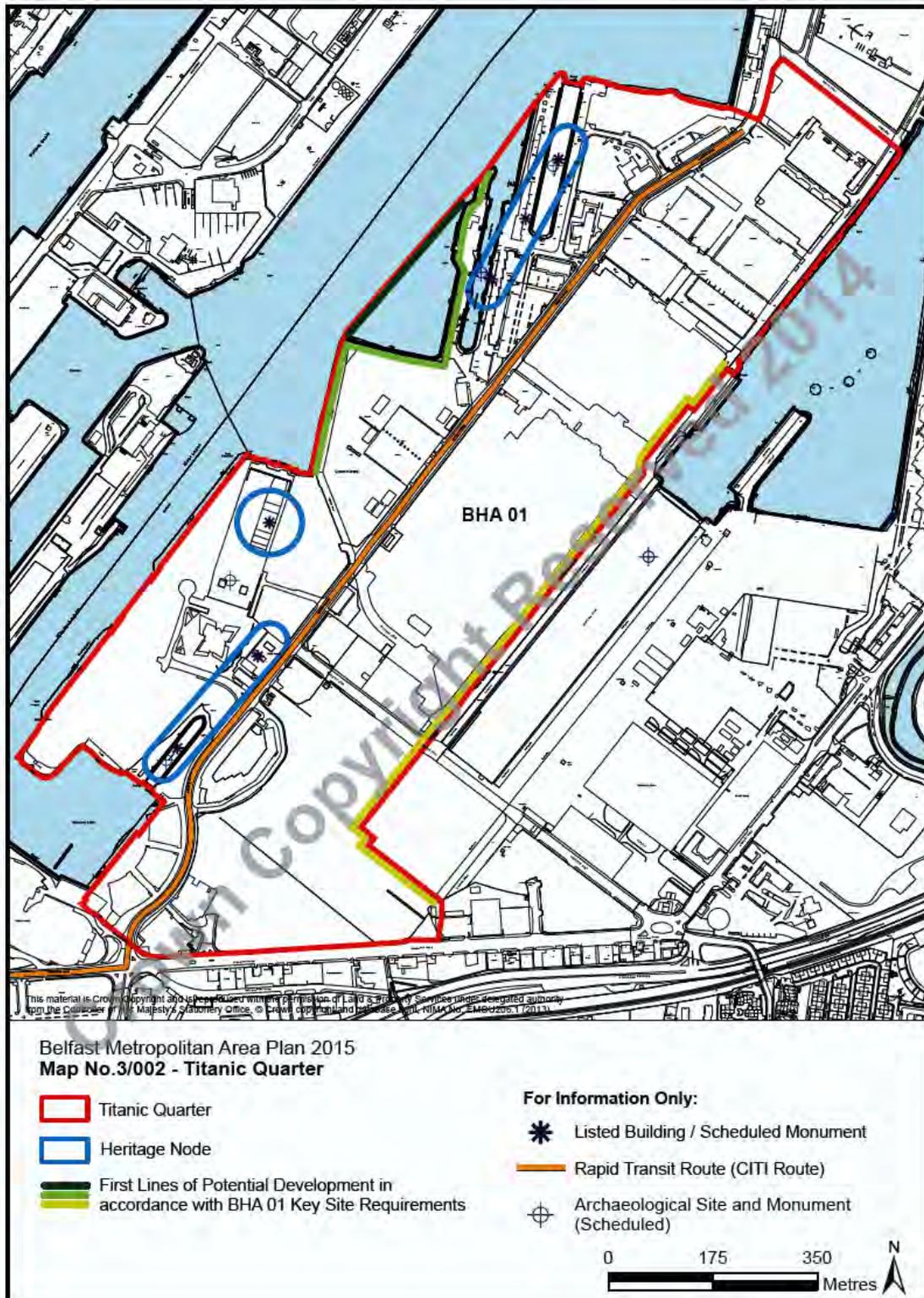
DPS Section	Policy	Modification Sought	Soundness Test
Vision, Aims & Objectives	N/A	Amend the City Centre boundary to include Titanic Quarter	CE2, CE4
Spatial Development Strategy	SD2	Amend the City Centre boundary to include Titanic Quarter	C1, C4, CE2, CE4
	SD3	Identify TQ as a standalone development opportunity area	C1, C4, CE2, CE4
Shaping a Living Place		Amend wording of proposed policy in line with Para. 7.7 of our submission	
	HOU4	Provide clarity with respect to identification of tall buildings within the city centre as there is no reference to the identification of sites in DES3	CE2
	HOU5	Undertake actions recommended in Para. 7.33 of our submission and undertake further consultations with housing sector (including TQL & BHC) to develop a workable affordable housing policy	C3, CE1, CE2, CE3
	HOU6	Delete policy	CE1, CE2

	DES3	Revisit the threshold of 35m Remove text ' <i>those which are significantly higher than their surroundings</i> ' Amend the wording in line with bullet points b) to f) of Para 7.20 of this submission	CE2
Creating a Vibrant Economy	EC2 & EC3	Recognise Titanic Quarter as forming an important segment of the City Centre commercial office market	
	EC2 & EC3	Identify Titanic Quarter as a location of choice for offices	C1, C2, C4, CE2, CE4
	EC6	Amend in a manner that is commensurate with requested modifications to EC2 and EC3	
	CC1	Amend text/mapping error Identify TQ as a standalone development opportunity area	C1, C4, CE2, CE4
Building a Smart Connected & Resilient Place	TRAN8	Ensure inbuilt flexibility of the policy in line with recommendations set out in Para 9.7 of this submission	C4, CE2
	TRAN9	Prepare an up to date evidence base	CE2

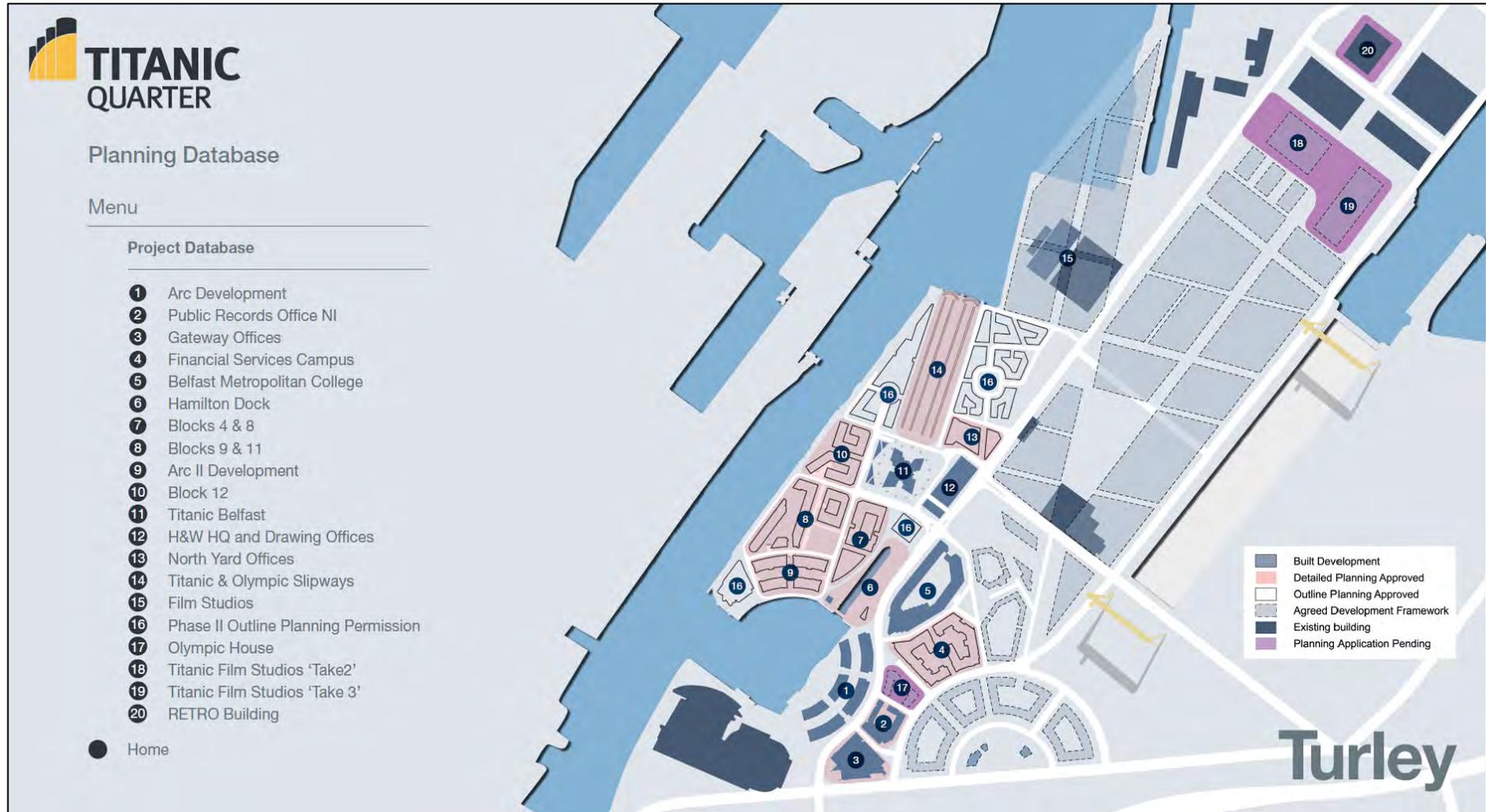
- 10.5 However, if Belfast City Council decides to submit the DPS in its current form to the Department for Infrastructure for an independent examination, we respectfully request an opportunity to appear and be heard at the Examination in Public in accordance with Section 10(7) of the Planning Act (Northern Ireland) 2011.

Appendix 1: Extent and Current Status of TQ

1. Map No. 3/002 - Titanic Quarter (reproduced below) of the now quashed BMAP is useful as it defines the extent of the Titanic Quarter and previously agreed key site requirements.



2. The image below provides a useful update in terms of the status and location of developments in Titanic Quarter



Appendix 2: TQ – Context and Evolution

1. Belfast's Titanic Quarter (TQ) is a 75 ha (185 acre) former shipbuilding site located at Queen's Island in central Belfast. Titanic Quarter Limited ("TQL"), is the promoter of Titanic Quarter and Belfast Harbour Commissioners ("BHC") is the owner of the lands at Titanic Quarter



2. The site was formerly part of the Harland and Wolff (H&W) shipyard which in its heyday employed over 30,000 persons and was one of the main economic drivers of

Belfast's growth and wealth until World War II. Most notably, the RMS Titanic was designed and built within the confines of TQ.

3. TQ represents one of the Europe's largest urban-waterfront regeneration projects and it is redefining what it means to work, live, play and stay in central Belfast. In the past decade much has been achieved - Titanic Quarter has gone from a master plan to reality as a thriving and bustling destination, attracting over 1 million visitors every year. With £425 million of investment completed to date, 18,000 people live, work, study and play in Titanic Quarter daily.
4. A broad vision has emerged over recent years for the Titanic Quarter and this has been articulated through the adopted development frameworks, which sought to reflect the unique scale and opportunity afforded by this strategic and prominent waterfront location. The Vision is that Titanic Quarter presents the opportunity to create a new high profile European waterfront urban quarter, essential to the future prosperity of the city as a whole.
5. Belfast Metropolitan Area Plan required that planning permissions must be made in accordance with an agreed development framework. The agreed development framework acknowledges the importance of connecting TQ to the traditional city centre and identifies this connectivity as being key to the TQ's overall success. Indeed, this acknowledgement has been reinforced through the delivery of site infrastructure, which at times has been ahead of the project delivery programme, as outlined in Appendix 4.
6. The agreed development framework ensures that TQ operates in conjunction with the rest of the city centre and is integrated with the city's social, economic and political context. Indeed, a Steering Group consisting of representatives of all the decision taking government agencies and the City Council played a critical role in deciding the future form and function of Titanic Quarter.
7. Since 2003, TQ has experienced significant investment, redevelopment and regeneration. A period of focused plan making has resulted in the following:
 - an agreed comprehensive Development Framework for the entire 75 ha;
 - masterplanning of phases within the overall development; and
 - over 30 approved planning applications and other consents for works to listed buildings and scheduled monuments.
8. A diverse range of uses and activities are now operational at Titanic Quarter which sustain the organic growth of a vibrant working and living community, whilst meeting the high expectations of visitors.
9. A resident population at the ARC development is a key component in delivering the mixed use redevelopment of Titanic Quarter. It is also noted that planning permission has already been granted for a further 2,000 apartments in TQ Phase 2, together with a supporting mix of uses, services and public or private open spaces.

10. As a result of its historic connections and the imaginative plans for its future regeneration, Titanic Quarter has a growing global presence and acts as a key attractor for new investment. This transformation has undoubtedly been good for the city of Belfast as a whole in terms of tourism, business development and new jobs.
11. In marketing terms, TQ is a 'destination' with a well-known and well-loved brand and this brings positive international attention to the city as a whole.

Appendix 3: TQ – Policy Context

1. This Appendix sets out the policy context of the Titanic Quarter (TQ) and includes references to the relevant national and local policies.

Regional Development Strategy (RDS) 2035

Major Employment Location

2. Strategic Framework Guideline (SFG) 1 of the RDS seeks to promote urban economic development at key locations throughout the Belfast Metropolitan Urban Area (BMUA) and ensure that sufficient land is available for jobs.
3. The RDS advises that *'Employment opportunities should be planned in a way that recognises the roles that the component parts play; builds on planned regeneration initiatives and maximises the use of existing and planned infrastructure provision, including public transport'*.
4. One of the approaches identified under SFG1 is the need to identify and protect key locations for economic growth which in turn will strengthen the role of the BMUA as the regional economic driver. The **Titanic Quarter** is identified as a **'Major employment/industrial location'** in the Belfast Harbour Area and the RDS advises that its connection to public transport will support the drive to provide a range of opportunities for job creation.

Regeneration Catalyst

5. Another approach identified under SFG1 is the need to direct mixed use development towards sites which will enhance local regeneration initiatives. The RDS states that the *'...regeneration of sites such as Titanic Quarter... and Belfast Harbour area will act as catalysts for regeneration'*. The RDS then further states that *'The Port of Belfast ... is already a key centre for industry and trade. This role will grow further as the residential, commercial and leisure potential of the Titanic Quarter lands are realised'*.

Distinctive and Regional Role of Belfast

6. Strategic Framework Guideline (SFG) 3 of the RDS seeks to enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities.
7. In terms of enhancing the employment potential of Belfast City Centre, the RDS advises that Belfast has a key role to play as the centre of regional administration and providing business services. The RDS notes that Belfast's *'...role will grow further as the residential, commercial and leisure potential of the Titanic Quarter lands area is realised'*. However, the RDS then sets out that *'The City Centre will continue to be the first choice for major office developments'*.

Strategic Planning Policy Statement (SPPS)

8. The SPPS for Northern Ireland was published in September 2015 and replaces the suite of planning policy statements (subject to transitional arrangements). Principally, an

exercise to rationalise and consolidate policy into a single document, there is no significant shift for the vast majority of policies.

9. Comprehensive application of the SPPS policies will take place upon adoption of the new local development plan by the local planning authority. It is noted that while the SPPS does not refer specifically to the Titanic Quarter, its policies in no way limit potential uses for TQ beyond limitations imposed by the extant PPSs.

Belfast Urban Area Plan (BUAP)

10. The TQ is located within the development limit of Belfast and is whiteland on the Development Strategy map, confirming a presumption in favour of development, providing normal planning criteria can be met e.g. access; siting and design.
11. The site is located outside of the Main Office Area identified on pg. 90 of the BUAP. The Office Development Strategy of the BUAP (pg. 82) advises that large scale office developments are to be directed to the Main Office Area and that smaller scale office developments will be acceptable in the remainder of the City Centre. However, the Office Development Strategy acknowledges the importance of locating new employment opportunities in locations that are accessible by both public and private transport.
12. The Office Development Strategy further states that individual proposals will be considered on their merits in relation to their surroundings and Policy CC 12 – High Buildings. In summary Policy CC 12 – High Buildings required the scale of all new office development to be controlled by a plot ratio of 3 to 1 and it sought to ensure that high buildings relate to their immediate surroundings.
13. Furthermore, Policy CC 2 - Office Development encouraged the location of large offices in the main office core, but it also sought to promote new office development in the City Centre generally.
14. Policy H3 encourages the provision of new housing within the existing urban area to stimulate urban renewal and meet local housing demand. The supporting text acknowledges that the introduction of new housing is crucial to the rejuvenation of older parts of the built-up area. Policy H5 encourages new housing to provide a range of house types to meet the wide variety of housing needs in terms of dwelling size, type and it accepts that part of the remedy to addressing housing need is to provide housing in the Belfast Urban Area to meet different market needs.
15. In terms of context, the Laganside Development covers part of TQ, up to and surrounding Abercorn Basin (see pg. 82 of the BUAP), which Policy CC5 describes as a revitalisation priority area. Policy CC5 advises that a large scale redevelopment programme is necessary on Laganside to clear derelict or obsolescent sites.
16. So far as the Lagan riverside is concerned, Policy LS1 of the BUAP identifies the development of riverside lands as a 'major priority'. The supporting text to Policy LS1 advises that the development of the sites within the Laganside will establish the waterfronts as important areas in the life of the City and provide new employment in convenient central locations.

17. In addition, the supporting text suggests that residential development could be introduced in the form of new housing schemes or the conversion of disused industrial buildings. In terms of scale, Policy LS4 advises that new buildings should normally be at least 3 storeys high so as to create an imposing waterfront development.
18. Overall, the primary objective of the BUAP City Centre strategy is to encourage new development to stimulate commercial activity and attract people to the city centre.

Belfast Metropolitan Area Plan (BMAP)

19. The adoption of BMAP (in 2014) has been declared unlawful by the Court of Appeal (judgment dated May 2017).
 20. In terms of site specifics of the now quashed BMAP, TQ fell within Zoning BHA01. Plan Amendment No. 1 Map No. 4 identified 7 different character area zones within TQ, ranging from A to G.
 21. Zoning BHA01 (as altered by Plan Amendment No.1) involved 6 pages of key site requirements for the future development of Titanic Quarter. The quarter was split into 7 zones (A-G) and required a comprehensive masterplan.
 22. It is noted that Draft BMAP also consisted of an illustrative Development Framework – see Map No 4 on the Plan Amendment. An argument advanced at the inquiry was accepted by the Planning Appeals Commission that this Development Framework (which zoned TQ for low rise light industrial uses) should be deleted from BMAP.
 23. Additionally, Zoning BHA01 set out different types of uses that were permitted within each zone, such as business uses, residential, small scale retail, hotel, tourism, light industrial, etc. Provision was also made for landmark buildings.
 24. The requirement for a comprehensive Development Framework (DF) is expected to remain as a core requirement of the DPS. The present DF was agreed by DoE Planning in 2008 (and as amended in November 2011) after extensive consultation which commenced in 2003. The agreed DF establishes the context of a number of full and outline planning approvals (including Phase II), many of which cross refer to the agreed DF in the attached planning conditions.
- 10.6 So far as the BUAP and Draft BMAP's Belfast City Centre Main Office Area is concerned, the PAC concluded that this designation was not required for Belfast. Indeed, the below extract from the Commission's report sets out the PAC's position:

We have concluded in the strategic Offices Section in Part 1 of our report that there is no need for a Main Office Area in Belfast and that offices should be allowed throughout the defined City Centre in the Plan. We therefore have no further comment to make on objection that sought either extensions or reductions of the Main Office Area within the defined City Centre. These objections have been addressed by our strategic conclusions. We have considered the arguments for reducing the Main Office Area and rejected them.

25. It is noted that in the 'inquiry report' for BMAP, the PAC recommended that TQ remain immediately outside the boundary of Belfast City Centre. However, this position was put forward by the PAC on the basis that TQ does not function as part of the City Centre. As set out in Appendix 4 below, TQ has experienced significant project and infrastructure delivery since the Draft BMAP (being the original source of the current City Centre boundary) and our client submits that these investments have further connected TQ with the City Centre so that TQ now functions as an extension of the City Centre.

Belfast Community Plan – Belfast Agenda (2017)

26. The Belfast Agenda is the city's first community plan, created by a strong partnership led by Belfast City Council. The plan sets out a joint vision and long-term ambitions for Belfast's future, as well as outlining priorities for action over the next four years.

27. It is ambitious and dynamic and will drive our emerging action plans for Belfast over the years to come. The plan sets out the following visions for Belfast in 2035:

'Belfast will be a city re-imagined and resurgent. A great place to live and work for everyone. Beautiful, well connected and culturally vibrant, it will be a sustainable city shared and loved by all its citizens, free from the legacy of conflict. A compassionate city offering opportunities for everyone. A confident and successful city energising a dynamic and prosperous city region. A magnet for talent and business and admired around the world. A city people dream to visit'.

28. The plan takes an outcomes based approach and it sets out the following outcomes that it wants to achieve by 2035:

- Everyone in Belfast benefits from a thriving and prosperous economy;
- Belfast is a welcoming, safe, fair and inclusive city for all;
- Everyone in Belfast fulfils their potential;
- Everyone in Belfast experiences good health and wellbeing; and
- Belfast is a vibrant, attractive, connected and environmentally sustainable city.

29. Thus, to help realise the vision and improve outcomes, the plan has set four bold ambitions to be achieved by 2035, which are:

- Our economy supports 46,000 additional jobs;
- Our city is home to an additional 66,000 people;
- There will be a 33 per cent reduction in the life expectancy gap between the most and least deprived neighbourhoods; and
- Every young person leaving school has a destination that fulfils their potential.

30. The plan is committed to growing the number of jobs in the city and providing support for residents to take advantage of these and it wants to encourage more people to both live and work in the city, directly contributing to its success, vibrancy and sustainability.

31. In terms of Belfast Now and under the City Development theme, the plan states that *'Belfast supports a growing tourism industry with over 1.5 million overnight trips to the*

city, including 1 million from out of state visitors. In 2016, **Titanic Belfast** was named as the world's number one tourist attraction'.

Appendix 4: TQ – Delivery

32. Regeneration at Titanic Quarter celebrated its 10th Anniversary (in October 2015). Each development within TQ has been brought forward in compliance with an agreed Development Framework (DF).

Project Delivery

33. Projects delivered/operational to date include:
- Public Records Office for Northern Ireland (PRONI);
 - Belfast Metropolitan College
 - Hamilton Dock refurbishment and SS Nomadic Restoration (a component of the Titanic visitor attraction);
 - The Titanic Belfast visitor attraction and Pavilions;
 - Titanic Film Studios comprising 6 studios and supporting facilities;
 - Gateway Offices (occupied by Citi Group);
 - Arc Apartments
 - Arc Apartments - active ground floor uses including cafes and local retail;
 - Titanic Walkway and the Great Light;
 - Titanic Hotel Belfast – refurbishment of the listed former Harland & Wolff Headquarters and drawing offices to a boutique hotel and visitor attraction;
 - Titanic House (refurbishment for offices) occupied by Todd Architects, Titanic Foundation and TQL
 - Premier Travel Inn (121 bed hotel with average occupancy at 90%+);
 - Catalyst Inc. (formally Northern Ireland Science Park) - 120 companies accommodated within The Innovation Centre, The Legacy Building, White Star House and 2 Concourse Buildings);
 - Titanic Exhibition Centre;
 - ECIT, the QUB Research Institute (including UK's Centre for Secure Information Technology)
 - The Pump House and Thompson Dock; and
 - Channel Commercial Park .

Events at Titanic Quarter

34. Belfast has developed a network of high quality hosting locations including Custom House Square, Waterfront Hall, Odyssey, Lyric Theatre, the Ulster Hall, the MAC and more.
35. Regeneration of Titanic Quarter has enabled the provision of two additional locations which further add to Belfast's network, these being Titanic Belfast and the Titanic & Olympic Slipways.
36. Titanic Belfast is regarded as a premier venue for events and now forms a significant component of the new Belfast brand. It has reinforced Belfast's position as the preferred choice for major sporting and cultural events.
37. The contribution that TQ has made to Belfast's sporting, social and cultural offer is evident by the many events that have been held here since 2011, which include:
 - BBC Proms in the Park
 - BBC Biggest Weekend 2018
 - Belfast Maritime Festival
 - Belfast Music Week (various locations including Titanic Quarter)
 - The Color Run
 - Carl Frampton – World title fight
 - Circuit of Ireland Special Stage
 - Dash of the Titans
 - Euro Fanzone
 - European Rally Championship
 - Giro d'Italia
 - Gran Fondo
 - Irish Wake Board Championships
 - Land of the Giants
 - Monster Mash – Halloween Fireworks
 - MTV Music Awards (Titanic Quarter and Odyssey)
 - NEST – Cultural Olympiad Art Installation
 - Tall Ships

- Titanic Belfast Festival
- TQ 10K
- World Police & Fire Games (various locations – closing ceremony on the Slipways)
- MTV Titanic Sounds Festival
- WISH Project (Titanic Quarter)

Infrastructure Delivery

38. Another significant achievement of TQ is the enabling infrastructure that has already been delivered in terms of:
- access improvement including new carriageways, junctions and signalisation of junctions;
 - connectivity improvements including high frequency bus provision, Belfast Rapid Transit (i.e. Glider) infrastructure and stops, improvements to Titanic rail halt, enrolment in the Belfast Bike scheme, new footpaths, provision of cyclist facilities, arrangements for taxi hire and facilities for coach parking;
 - high quality public realm improvements at Abercorn Basin, Hamilton Dock, Titanic & Olympic Slipways, Titanic Walkway and the environs of HMS Caroline;
 - landscaping and improvement works (street planting and seeding of prominent undeveloped spaces);
 - street lighting;
 - restoration of maritime heritage (including refurbishment of dock edges, quay walls, scheduled slipways and cobbled surfaces); and
 - car parking provision at Belfast Metropolitan College and Titanic Belfast basement car parking – approximately 830 spaces.
39. The projects currently delivered and those planned are all serviced by Titanic Quarter’s private managed high-capacity fibre & copper telecommunications network infrastructure on an open-access, carrier neutral basis. The open-access network infrastructure removes the barriers to customer choice that often dictate carrier selection, and within the estate, telco carriers and major IT services companies such as Eircom, Cable & Wireless, Virgin Media, GTT, and Fujitsu currently service public and private sector clients of every scale utilising Titanic Quarter’s infrastructure.
40. The Titanic Quarter telecoms network sits within a larger Belfast Metropolitan Ring Network and, through a managed service provider, provides links to the regions of Northern Ireland, Republic of Ireland the UK, Europe and the USA providing the widest possible scope for carriers who do have footprint nearby (or indeed locally at all) to provide service to any of their customers who locate in the area.

41. The local and wider network has been enhanced by the provision of Project Kelvin, which is a new direct link between Northern Ireland and North America which provides higher capacity, higher security and lower latency for the users within the network.
42. The agreed Development Framework for TQ outlines a phasing strategy, for both the projects and the enabling infrastructure. The table below presents the progress of developments against the phasing strategy

Phase	PDF Infrastructure Commitments (completed in green)	Completed Projects	Planned Projects
1	<ul style="list-style-type: none"> Realign Queen's Road Signalise Queen's Road/Sydenham Road Junction Sydenham Road improvements Sydenham Road cycle lanes Abercorn Basin Public Realm Abercorn Basin dock wall 	<ul style="list-style-type: none"> Gateway Offices Arc Residential Premier Inn 	-
2 & 2a	<ul style="list-style-type: none"> Extend improvements along Queen's Road High frequency bus service Facilitate BRT route Provision of coach/bus drop off points Contribute funding to new grade separated interchange Remove Dee street signals & upgrade Dee Street junction Continuation of improvement along Sydenham Road Refurbish Hamilton Graving Dock Restoration of scheduled slipways to create major area of public realm 	<ul style="list-style-type: none"> Titanic Belfast Belfast Metropolitan College 	<ul style="list-style-type: none"> Olympic House Riverside Quay (apartments) North Yard Offices Arrol building (hotel & apartments) Abercorn Tower (hotel & apartments) Arc II Apartments Block 12 retail, hotels and apartments Titanic Hotel
3	<ul style="list-style-type: none"> Construction of Titanic Boulevard to tie into Hamilton Road Extend upgrade of Queen's Road Create cycle/pedestrian network Upgrade Airport Road Quay Walls & walkway/cycle route 	<ul style="list-style-type: none"> Public Records Office for Northern Ireland 	<ul style="list-style-type: none"> Financial Services Campus

-
- 4 Construct Olympic Boulevard
 Provide pedestrian friendly
 Major public park
-

43. The table above illustrates that the significant frontloading of site infrastructure has outpaced but now enables project delivery. This is due in large part to the planning requirement that each development is accompanied by the infrastructure components to ensure the project can operate independently of other projects (or phases).
44. This approach means that TQ can synchronise the delivery of infrastructure and the individual development projects. The extent of infrastructure delivery indicates that there is significant front loading of project infrastructure across Phases 1, 2 and 2a.

TQ Today

45. Today on Queen’s Island, there are six significant economic and social platforms, each capable of delivering substantive benefits to all the citizens of Belfast, these being:
- (i) Tourism and Visiting;
 - (ii) Working;
 - Financial Services and Creative Media
 - Technology (incl. Research & Development);
 - Grade A offices; and
 - Financial & Business Services.
 - (iii) Connecting;
 - (iv) Relaxing/Recreation and Leisure (incl. hotels and retail); and
 - (v) Living
 - (vi) Learning & Discovery / Education and Science & Technology;
46. These 6 platforms are represented in the TQ Vision Diagram, reproduced below:



47. This diversity of uses and activities demonstrates the scale of innovation possible at Titanic Quarter combined in an overall experience that is distinctive and unique domestically, nationally and internationally.
48. The magnitude of TQ's contribution to Belfast and the wider NI economy is highlighted in Appendix 5 which includes an 'Economic Potential Brochure'. It is clear, having reviewed this brochure, that TQ makes significant contributions in terms of investment, employment, rates, tourism and in growing the city's residential population.

TQ Tomorrow

49. The 'Economic Potential Brochure' within Appendix 5 quantifies the contribution that TQ has and will continue to make to the city economy.

Appendix 5: TQ – Economic Potential Brochure

Appendix 6: Belfast Office Needs Assessment

Appendix 7: BCC's DPS Form

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For further information contact

Brian Kelly



TITANIC QUARTER

ECONOMIC POTENTIAL

2016 – 2021



TITANIC QUARTER LIVE WORK PLAY



“Titanic Quarter’s mix of residential, commercial, tourism, education and retail provides Belfast with a successful and vibrant urban quarter.

Reflecting the achievements of history with the latest design approaches, it is this diversity of organisations living, working and playing in Titanic Quarter that is key to our vision’s success.”

James Eyre, Commercial Director, Titanic Quarter

ACHIEVEMENTS

-  18,000 people live, work and play in Titanic Quarter
-  Over one million people visit Titanic Quarter each year
-  Over 100 national and international organisations including Citi, Microsoft, IBM, SAP, HBO, Belfast Metropolitan College, Ulster University and Queen's University Belfast are already established in Titanic Quarter
-  £165 million invested in Titanic Quarter by Titanic Quarter Ltd shareholders
-  £19.7 million donated to Titanic Belfast by Titanic Quarter Ltd
-  £21.5 million invested in Titanic Quarter infrastructure and enablement by Titanic Quarter Ltd
-  1.5 million sq ft completed and 3 million sq ft with planning approval
-  Retention and reuse of all our Maritime heritage assets
-  Sustainable, mixed-use, waterfront location in central Belfast



Investment



Construction
Employment



Permanent
Employment



Employment Value
per annum



Rates payable
per annum

2007 – 2016

£425 million

c. 500 – 800
jobs per annum

c. 5,950 jobs

£180 million

£4 million

2016 – 2021

£365 million

c. 500 – 1,000
jobs per annum

c. 9,550 jobs

£285 million

£4.5 million

2007 – 2021

£790 million

–

c. 15,500 jobs

£465million

£8.5 million

GRADE A OFFICES & EMPLOYMENT



Completed by 2016 – 💰 £110m investment – 👤 4,200 jobs – 🏠 1.475m sq ft

GRADE A OFFICES & EMPLOYMENT

Attracting Global Investors

- Gateway Offices occupied by Citi (1,650 employees)
- Occupants include Catalyst Inc, Microsoft, IBM, SAP, QUB, PRONI
- Advanced I.T. infrastructure
- Europe's fastest direct fibre optic links to North America

Future Grade A Office Plans

- Olympic House
 - Investment £28.5m
 - 2,100 jobs
- North Yard
 - Investment £24.5m
 - 2,000 jobs
- Financial Services Campus (Phase 1)
 - Investment £47m
 - 3,700 jobs



Projected total 2021 – 🏠 £210m investment – 👤 12,000 jobs – 🏢 2.0m sq ft

MEDIA CAMPUS

“Game of Thrones has established Northern Ireland as a world-class location for film and TV production.”

Richard Williams, Chief Executive of NI Screen



Completed by 2016 – 💰 £12m investment – 👤 750 jobs – 🏠 150,000 sq ft stage/production space

MEDIA CAMPUS

- HBO Game of Thrones series has contributed up to £148m to the economy of Northern Ireland
- Titanic Studios credits
 - Your Highness (Universal Pictures)
 - City of Ember (Walden Media)
 - The Fall (Artists Studios)
 - Line of Duty (World Productions)
- Studio Phases 2 & 3
 - £28m Investment
 - 1,500 jobs
- State-of-the-art post production facilities



Projected total 2021 – £40m investment – 1,500 jobs – 300,000 sq ft stage/production space

HOTELS & DESTINATION



Completed by 2016 – 🍷 £8m investment – 👤 50 jobs – 🛏 121 rooms

HOTELS & DESTINATION

Future Hotel Developments

– Titanic Hotel Belfast and Drawing Offices

- Opened September 2017
- £25m Investment
- 165 jobs
- 120 rooms

– Hamilton Dock Hotel

- £35m Investment
- 300 jobs
- 244 rooms

– Plater's Yard

- £22m Investment
- 135 jobs
- 275 rooms



Projected total 2021 – 🏠 £90m investment – 👥 650 jobs – 🛏️ 763 rooms

TOURISM & LEISURE



Completed by 2016 – 💰 £120m investment – 👥 400 jobs

TOURISM & LEISURE

TQ Heritage Tourism Destination

- 1 million-plus visitors annually
- SS Nomadic, Titanic Slipways, Thompson Dock, PRONI, HMS Caroline
- Mew Island Optic
- Titanic Walkway
- Navigational Buoys

Titanic Exhibition Centre

- 1,000 to 15,000 attendees at exhibitions, conferences and sporting events

Titanic Belfast

- 5 million visitors to Titanic Belfast across 145 countries (since opening 2012)
- £160m additional tourism spend for the economy of Northern Ireland
- 2016 winner of World's Leading Tourist Attraction - World Travel Awards



RESIDENTIAL & RETAIL



Completed by 2016 – 💰 £105m investment – 👤 150 jobs – 🏠 474 apartments

RESIDENTIAL & RETAIL

- Planning approved for 2,000 apartment homes
- Convenience retailer expansion
- Attracting local and international restaurateurs (Subway coming soon)



EDUCATION & LEARNING



Completed by 2016 – 🏠 £70m investment – 👤 400 jobs

EDUCATION & LEARNING



Projected total 2021 – 💰 £95m investment – 👤 500 jobs

SHARED SPACE

Titanic Quarter is a new space for the people of Belfast and Northern Ireland, welcoming everyone.



SHARED SPACE

- 18,000 people live, work, study and play in TQ daily
- TFL supported and delivered Titanic Belfast, SS Nomadic and restoration of H&W Drawing Offices
- TFL promotes enjoyment and learning through community led arts and heritage projects
- The Dock Café, promotes positive community relations and social responsibility
- TQ supports major cultural and sporting events
 - BBC Proms in the Park
 - Giro d'Italia
 - TQ10K
 - Gran Fondo
 - MTV Music Awards
 - Tall Ships
 - Euro Fanzone
 - BBC Big Weekend 2018





THANK YOU

Belfast Office Needs Assessment

Prepared in response to the Belfast City Council
Local Development Plan Draft Plan Strategy

On behalf of Belfast Harbour Commissioners
and Titanic Quarter Ltd

November 2018

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Gavin Amos



Client

Belfast Harbour Commissioners and Titanic Quarter Limited Ltd

Our reference

TQLB3034

November 2018

1. Introduction

- 1.1 This Office Needs Assessment has been prepared by Turley Economics and CBRE on behalf of Titanic Quarter Limited and Belfast Harbour Commissioners to inform a detailed representation to the Belfast City Council Local Development Plan (LDP) Draft Plan Strategy (DPS).
- 1.2 It is principally concerned with economic policies EC2, EC3 and EC6 and the proposed limitation of office floorspace provision at the Titanic Quarter and Belfast Harbour Major Employment Location (MEL). A key concern is that the draft policies do not cater for all business needs and are likely to result in an inadequate supply of office floorspace being delivered over the plan period.
- 1.3 This report provides supplementary evidence on Belfast's future office needs, in turn providing the necessary evidence based justification to enable the Council to amend Policies EC2, EC3 and EC6 to allow greater flexibility and provision of office floorspace at Titanic Quarter, which is considered to be important in so far as ensuring the plan meets identified needs in full and can be found sound.
- 1.4 In support of this objective, the report presents evidence to demonstrate that:
 - There is a significant need and demand for office floorspace in growing Belfast City, beyond that currently recognised in the draft Plan and its informing evidence base.
 - Whilst the Council has taken a comparatively positive approach to identify employment floorspace capacity across the City Centre, the available supply is overstated and likely to be the subject of a number of delivery constraints over the plan period.
 - The current approach masks important nuances in demand across different sectors and locations.
 - A lack of choice in supply and location has the potential to undermine Belfast's role as the primary office location in Northern Ireland and could result in investment being lost.
 - A more flexible approach is required to mitigate against demand not being met as a result of insufficient choice within the supply of new floorspace.
 - The complementary role and future contribution of the Titanic Quarter in commercial market terms should be recognised within the draft LDP.
 - Demand for office floorspace extends beyond the current boundary of Belfast city centre, with Titanic Quarter being recognised by agents and occupiers as forming an important segment of the City Centre commercial office market.
 - Allowing more offices in Titanic Quarter, that are complementary to the city centre or would otherwise not locate in Northern Ireland, will not undermine the

Plan's objective to concentrate new office development within the existing City Centre. This recognises the City Centre's current role and function as the primary location for offices within the city and that the Titanic Quarter:

- represents a 'growth of the city centre' with an offer that complements rather than competes with the city centre as the regional driver of economic growth.
 - has a pivotal role in attracting inward investment and creating significant employment with key growth sectors, including Financial Services.
 - offers the potential to provide greater flexibility in the supply of identified land within two related and adjacent locations, mitigating risks to delivery that might otherwise manifest over the plan period.
- There are precedents from elsewhere which demonstrate that a complementary non-competing offer in an area representing an extension to the traditional City Centre can be critical to stimulating a strong market and attracting investment.
 - Clustering headquarters offices has also proven to be a successful strategy for catalysing investment in globally competitive cities and Titanic Quarter presents a significant opportunity to replicate that success here in Belfast.

1.5 These issues are explored further within this report with reference to adopted and emerging policy, assessed needs and relevant market signals.

Report Structure

1.6 The report is structured as follows:

- Section 2 – Strategic Economic Growth Context
- Section 3 – Emerging Development Plan Context
- Section 4 – The Assessed Need for Office Floorspace
- Section 5 – Market Trends and Occupier Requirements
- Section 6 – The Titanic Quarter: A Complementary Offer
- Section 7 – Conclusions and Recommended Modifications to the Draft LDP

2. Strategic Economic Growth Context

2.1 The drivers of demand in economic development policy and strategy terms are summarised below. These highlight a number of key spatial issues that the LDP must respond to in driving forward the sustainable economic growth of Belfast, and the wider Northern Ireland economy, over the plan period.

Draft Industrial Strategy for Northern Ireland

2.2 In January 2017, the Northern Irish Government's Department for the Economy published a consultation Draft Industrial Strategy for Northern Ireland¹, aiming to outline an *"ambitious"* framework for growth to meet its overarching vision of *"a globally competitive economy that works for everyone"*².

2.3 The Strategy outlines its 'Pillars for Growth' – the key components of its growth framework, including:

- **Accelerating Innovation and Research**, aiming for firms to compete on the basis of their innovation across all sectors of the economy, aided by an agile government able to respond quickly and appropriately to the needs of industry;
- **Driving Inclusive, Sustainable Growth**, aiming for growth in sectors and technologies with existing local strengths, supported by an economy where an increasing number of businesses scale up, employing more people in the process;
- **Succeeding in Global Markets**, aiming to have a strong global presence as the location of choice to invest, do business, visit, study and live, seeking to attract international investment and develop strategic partnerships; and
- **Building the Best Economic Infrastructure**, recognising the country's cities and population centres as drivers for economic growth and supporting this through investment in business infrastructure.

2.4 A number of key milestone targets are set out in the Strategy, including:

- Making the country the number 1 UK Foreign Direct Investment (FDI) location outside of London by 2021;
- Growing private sector output by 35%, creating 80,000 new jobs by 2030;
- Putting Northern Ireland in the top 3 most competitive small advanced economies by 2030; and
- Increasing annual spend on R&D to £1.5 billion by 2030.

¹ Department for the Economy (2017) Economy 2030 – a consultation on an Industrial Strategy for Northern Ireland

² *Ibid.* p. 4

- 2.5 The strategy of aiming to grow those sectors in which the country already has competitive strengths (such as Financial, Business & Professional Services and Digital & Creative Technologies) is outlined in the document, stating that doing so requires “*for policy levers and investment to be targeted accordingly*”³.
- 2.6 For example, ICT, and particular cyber-security, is highlighted as a key local strength to Belfast, the Strategy stating that Belfast now has the highest concentration of cyber-security jobs in Europe, outlining that the sector could provide employment for up to 5,000 people if given adequate support.
- 2.7 Life sciences and precision medicine are similarly highlighted as key sectors where greater connectedness should be sought across business, government, clinicians, health professionals and academia in order to provide a continuum of support from early stage research through to commercialisation and high-value job creation⁴.

Regional Development Strategy (RDS) 2035

- 2.8 The Regional Development Strategy 2035⁵ (RDS) was first produced by the Department for Regional Development in 2010. It is a statutory overarching strategic planning framework designed to facilitate and guide the public and private sectors. The RDS informed the policies later set out in the SPPS (see above) and must be therefore also taken into account by local planning authorities when producing their Local Development Plans.
- 2.9 The RDS seeks to influence the future distribution of development throughout Northern Ireland and therefore addresses “*economic, social and environmental issues aimed at achieving sustainable development and social cohesion*” in order to drive its vision of a “*dynamic, prosperous, and progressive Northern Ireland*”⁶.
- 2.10 The first of the eight key aims defined by the RDS is to “*support strong, sustainable growth for the benefit of all parts of Northern Ireland*”⁷. This states that a growing regional economy will benefit from strong urban and rural areas, and that this requires a co-ordinated approach to the provision of services, jobs and infrastructure and a focus on co-operation between service providers.
- 2.11 The RDS includes land-use policies which seek to promote the economic development of the region, including:
- **Policy RG1: Ensure adequate supply of land to facilitate sustainable economic growth;** development which promotes the growth of jobs is prioritised in urban areas and regional gateways, taking advantage of their locations on the regional transport network⁸; and

³ *Ibid.* p. 24

⁴ *Ibid.* p. 25

⁵ Department for Regional Development (2010) Regional Development Strategy 2035

⁶ *Ibid.* p.10

⁷ *Ibid.* p. 18-19

⁸ *Ibid.* p. 31

- **Policy SFG1: Promote urban economic development at key locations throughout the Belfast Metropolitan Urban Area (BMUA) and ensure sufficient land is available for jobs;** it is recognised that it is a priority to strengthen the regional economic role of the BMUA in order to facilitate job creation. The Titanic Quarter is highlighted as a key strategic employment location which will act as a catalyst for regeneration⁹.

2.12 The Titanic Quarter is also identified specifically in ‘Policy SFG3: Enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities’, the RDS stating that the employment potential of Belfast City Centre will “grow further as the residential, commercial and leisure potential of the Titanic Quarter lands area is realised”¹⁰.

Invest Northern Ireland Business Strategy

2.13 Invest Northern Ireland (Invest NI) is the country’s economic development agency, seeking to act as a catalyst for growth through “*supporting local businesses to create jobs, innovate and grow their exports; and by attracting new inward investors*”¹¹.

2.14 Invest NI published their Business Strategy for the period up to 2021 in May 2017, which outlines the ways in which they will contribute towards meeting the Northern Ireland Executive’s draft Programme for Government and the associated Industrial Strategy, with the agency’s key targets including:

- Supporting and encouraging 30 - 40,000 additional jobs;
- Increasing business expenditure on research and development by £160 -£200 million¹²

2.15 As with the Industrial Strategy, Invest NI’s Business Strategy states that there should be strong focus on the key sectors in which the country already displays world-class attributes or potential, such as:

- Financial, business and professional services;
- Digital and creative technologies;
- Life and health sciences;
- Cybersecurity;
- Legal services technology;
- Precision medicine; and
- Big data / Internet of things.

⁹ *Ibid.* 54

¹⁰ *Ibid.* p. 56

¹¹ Invest Northern Ireland (2017) Business Strategy 2017 – 21

¹² *Ibid.* p. 2

- 2.16 It is highlighted that young businesses, particularly those operating in international markets from an early stage, have the highest growth rates and are the largest contributors to job creation. Therefore, in order to support growing businesses and the innovation economy, the Strategy places “*strong emphasis on ensuring that the ecosystems and infrastructure are in place and enhanced to support the growth companies of the future*”¹³.
- 2.17 Whilst Invest NI states that its skilled people, competitive costs, infrastructure and attractive tax regime makes Northern Ireland “*one of the UK’s most attractive regions for global investors*”¹⁴, the Draft Belfast Local Development Plan Employment and Economy Technical Paper¹⁵ references an EY report which shows that foreign investment “*plummeted*”¹⁶ by over 50% between 2016 and 2017. This may point to a more uncertain future of Belfast’s economic prosperity in the short to medium term, indicating that proposed inward investment in the form of the development of employment space could contribute to slowing this trend.

Belfast Region City Deal

- 2.18 The Belfast Region City Deal (BRCD) is a bespoke package of funding and decision-making powers negotiated between central government and local authorities, which aims to accelerate inclusive economic growth for the region, delivering high-quality jobs and boosting skills, productivity and quality of life for residents. The BRCD comprises the six council areas of Antrim & Newtownabbey, Ards & North Down, Belfast City, Lisburn & Castlereagh, Mid & East Antrim and Newry, Mourne & Down, working in partnership with private sector and further education partners including Queen's University Belfast and Ulster University.
- 2.19 Investment of £350 million in the BRCD was announced as part of the UK Government’s 2018 Autumn Budget, alongside the NI Executive’s contribution of at least a further £350 million, with councils also contributing over £100 million. It is anticipated that direct investment from the private sector will take the overall package to well over £1 billion¹⁷. The ambition is for the deal to create up to 20,000 new and high-skilled jobs, through delivering a 10 year programme of inclusive economic growth, including an increase of £470m Gross Value Added (GVA)¹⁸.
- 2.20 As set out in the he BRCD’s Summary of Proposals document¹⁹, its key objectives are centred around three key ‘investment pillars’ – comprising a focus on innovation and digital industries, tourism-led regeneration and infrastructure – which will serve to support growth in employability and skills in the region. Justifying the concentration on innovation and digital as a key growth sector, the Proposals Summary states that:

“The Belfast Region requires a catalyst that will drive forward investment in research and development and help embed a culture of innovation to act as a driver for

¹³ *Ibid.* p. 19

¹⁴ <https://www.investni.com/international/europe/fdi.html>

¹⁵ Belfast City Council (2018) Belfast Local Development Plan: Technical Supplement 3 – Employment and Economy

¹⁶ *Ibid.* p. 20

¹⁷ <http://www.belfastcity.gov.uk/buildingcontrol-environment/regeneration/city-growth-deal.aspx>

¹⁸ *Ibid.*

¹⁹ Belfast Region City Deal (2018) Summary of Proposals

increased productivity... This will be enabled through a digital partnership, technology testbeds, digital infrastructure and an innovators' network, that will connect and enable the centres of excellence and reach out across the region to build the capacity in indigenous businesses to fully engage in the Knowledge Economy."²⁰

- 2.21 It is outlined that the development of technologically advanced innovation spaces and facilities is crucial in order to support the BRDC's concept of a Regional Innovators Network, which will provide "*problem-solving environments that foster creativity across the region, empowering businesses and communities with critical opportunities for innovating, creating and skill building*"²¹. Advanced manufacturing, digital healthcare technology, big data sourcing and management and the development of advanced connectivity infrastructure are all cited as key sectors which will be targeted for investment.

Belfast Agenda

- 2.22 Published in 2017, The Belfast Agenda²² is the city's first community plan, and informs a number of the strategic policies in the draft Local Development Plan (LDP), aiming to meet the vision of "*a city re-imagined and resurgent. A great place to live and work for everyone*"²³
- 2.23 The Belfast Agenda prioritises inclusive growth, targeting an additional 46,000 jobs in the city by 2035, including an additional 15,000 by 2021. The Agenda states that this should be supported through securing £5 billion in inward investment over the next 10 years, and creating innovation, research and skills hubs. Additionally, it is outlined that a 5% growth in the city's Rates base will be sought through growth and development, as well as the provision of 1.5 million sqft of Grade A office space²⁴. In order to achieve this, the Strategy recognises that "*rebalancing the economy by encouraging private sector investment is essential for generating sustainable growth, increasing productivity and creating diverse and well paid jobs*"²⁵.
- 2.24 The responsiveness of the LDP's economic growth policies to this growth context is considered in more detail throughout this report.

Belfast City Centre Regeneration and Investment Strategy

- 2.25 The Belfast City Centre Regeneration and Investment Strategy (RIS) was published in September 2015²⁶, and sets out BCC's ambition for the continued growth and regeneration of the city core and its surrounding areas to 2030. Amongst the principles underpinning the strategy – which seek to ensure it's maximum economic and social impact – are:

- Increase the employment population;

²⁰ *Ibid.* p. 4

²¹ *Ibid.*

²² Belfast City Council (2017) The Belfast Agenda: Your future city Belfast's Community Plan

²³ *Ibid.* p. 10

²⁴ *Ibid.* p. 8-9

²⁵ *Ibid.* p. 23

²⁶ Belfast City Council (2015) Belfast City Centre Regeneration and Investment Strategy

- Create a regional learning and innovation centre; and
- Connect the city centre's various districts²⁷

2.26 In terms of the physical context of Belfast City Centre which is addressed by the strategy, it is stated that:

"This strategy takes a larger view of what constitutes Belfast City Centre than has typically been used. A city centre is partly defined by its functions, and in Belfast today city centre functions take place not only in the traditional core inside the bounds of the River Lagan, Westlink and M3, but also in City Quays and Titanic Quarter" [our emphasis]

2.27 As such, the Titanic Quarter is highlighted by the RIS as providing a "significant" city centre employment role "in terms of providing choice to occupiers"²⁸, affirming that "the Titanic Quarter provides a deliverable and affordable option"²⁹ for organisations seeking office space, it having already been successful in attracting high-profile private sector companies such as Citi Group, Kana, Fidessa, Consilium Technologies and Ciena.

2.28 The RIS states that, whilst the Titanic Quarter is outside of the traditional city core, many UK cities have similar patterns of dispersed office development in and adjacent to their centres, identifying the comparable example of Manchester City Centre and Salford Quays. The RIS highlights that the Manchester and Salford Quays are in fact "much more separated" than Belfast City Centre and the Titanic Quarter, suggesting that "what may initially be perceived as competing office clusters can evolve to become a complementary offer"³⁰. The case of Manchester and Salford Quays is also cited by the RIS as serving as an indication that "new office tenants were not able to find suitable space in the core, and that office employers and workers did not have a strong preference to be located in the centre"³¹.

2.29 In the RIS's 'Section 3: Policies for the City Centre', one of the identified key Opportunities to support the objective of 'Increase the Employment Population' is therefore "Identify key Grade A office sites in three locations and prepare them for development, including Traditional office core between Great Victoria Street and Bedford Street; City Quays; and Titanic Quarter"³² [our emphasis]. It is stated that this will serve to "help bring important employment areas closer to the city centre"³³.

The Smart Belfast Framework 2017 to 2021: Supporting Urban Innovation

2.30 Smart Belfast is a project which seeks to foster partnership and collaboration between BCC and the city's universities, businesses and citizens in order to most effectively harness technology and innovation in order to make Belfast the best possible place to live, work and invest. In partnership with the Future Cities Catapult, the Smart Belfast

²⁷ *Ibid.* p. 2

²⁸ *Ibid.* p. 22

²⁹ *Ibid.*

³⁰ *Ibid.* p. 47

³¹ *Ibid.*

³² *Ibid.* p. 48

³³ *Ibid.*

Framework was published by BCC in 2017, and outlines the role that technology innovation can play in supporting the policy aims of the Belfast Agenda i.e. delivering inclusive growth whilst growing the city's population by 66,000 and increasing the number of people employed in the city by 46,000³⁴. The framework therefore outlines proposals which seek to foster conditions for greater collaborative innovation between public, commercial, academic and community organisations in Belfast.

- 2.31 The Framework establishes a number of 'Guiding Principles', which aim to provide an overarching strategy for how innovation, technology and data science can contribute to the success of the Belfast Agenda. Various identified amongst these Principles are:
- **Support for local businesses and enterprises**, seeking to grow the local economy and achieve local multiplier effects through strengthening and promoting the local tech scene and stimulating new business growth.
 - **Digital and data projects**, seeking to unlock innovation through engagement with and support for Belfast's major growth sectors, such as cyber security, analytics, Internet of Things, and machine learning.
- 2.32 In terms of smart technology and innovation's role in growing the local economy, the Framework highlights that Belfast is home to a large number of locations that could be considered, or could become, centres of innovation. It therefore proposes that there should be a focus promoting these centres in order to constitute a city-wide offer for investors and innovators, which could in turn support economic development through clustering effects³⁵. Innovation hubs are therefore identified as a means of both attracting investment into the city, and a key means of providing resources such as event space, co-working space, equipment and distribution channels, thereby generating further investment and economic development.

Summary

- 2.33 The above review of the various economic strategies, published by regional and local government and partners, demonstrates the broad consensus that the Northern Irish economy of the future must be one which has a foundation of innovation and enterprise, with a focus on supporting existing sectoral strengths.
- 2.34 It is affirmed that "*ambitious*" policy and economic strategy measures will be required in order to attract the necessary investment to drive growth in employment and productivity. Furthermore, it is made clear that this will have to be supported through the delivery of the appropriate quantum and type of employment floorspace.
- 2.35 The responsiveness of the LDP's economic growth policies to this growth context is considered in more detail throughout this report.

³⁴ Belfast City Council (2017) The Smart Belfast Framework 2017 to 2021: Supporting Urban Innovation, p. 4

³⁵ *Ibid.* p. 36

3. Emerging Development Plan Context

3.1 Recognising its role in supporting the delivery of the ambition and positive investment context outlined in section 2, Belfast’s Local Development Plan (LDP) Draft Strategy³⁶ outlines the proposed policy objectives and growth strategy to guide development in the city up to 2035.

3.2 The LDP’s vision is that by 2035:

“Belfast will be a globally successful, smart regional city that is environmentally resilient with a vibrant economic and social heart. As a centre of learning and business, the knowledge economy flourishes where collaboration and innovation attracts investment, talent and jobs”³⁷

3.3 Strengthening Belfast as a regional economic driver is recognised as being key towards fulfilling the LDP’s objective of “creating a vibrant economy”³⁸. In order to do so, the Strategy states that “through the plan, we will seek to create the conditions to support regeneration and opportunities for attracting high quality inward investment and jobs”³⁹. Further detailing the land-use requirements necessary to support the aim of maintaining a strong economy, the LDP outlines that it is crucial that “a range of suitable sites for employment uses are available and able to be developed to meet the future growth of the economy and employment”⁴⁰.

Creating a Vibrant Economy

3.4 The Draft LDP’s growth strategy targets the creation of 46,000 additional jobs between 2020 and 2035 (as was also outlined in The Belfast Agenda), with this to be supported by planning for the provision of 550,000 sqm of employment floorspace⁴¹. It is stated that meeting these targets will enable Belfast to compete with similar sized cities elsewhere in the UK and Ireland, to attract investment and ultimately grow a modern economy, thereby strengthening the city as the regional economic driver for NI and delivering a vibrant city at the core of the region.

3.5 Chapter 8 of the draft LDP deals specifically with Policy measures to support inclusive economic growth across Belfast. The Council’s ambitious growth strategy is referenced at Para 8.1.5 in the context of the Belfast Agenda, where it is recognised that:

“An ambitious level of economic growth is essential to enable the city to compete with similar sized cities elsewhere in the UK in terms of attracting investment, creating jobs, driving the regional economy and competing in an ever increasing globalised market. This level of growth needs to be underpinned by a buoyant economy and the LDP has an

³⁶ Belfast City Council (2018) Belfast Local Development Plan Draft Strategy 2035

³⁷ *Ibid.* p. 24

³⁸ *Ibid.* p. 27

³⁹ *Ibid.*

⁴⁰ *Ibid.*

⁴¹ *Ibid.* p. 34

important role in ensuring that an appropriate level of land is allocated to meet these growing needs”(our emphasis)⁴².

3.6 This is followed by policy aims which in combination are intended to proactively drive forward the sustainable economic growth of Belfast over the plan period. This includes, amongst other objectives, the need to:

- “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; and
- Ensure the mix of employment land is available in the right locations throughout the city”⁴³.

Policy EC1 – Delivering Inclusive Economic Growth

3.7 In line with the aforementioned economic strategy and policy aims, Policy EC1 identifies a number of business sectors with strong growth potential including:

- Creative and digital industries;
- Financial and Professional Services;
- Advanced Engineering;
- Clean Technology;
- ICT and electronics;
- Hospitality and Tourism; and
- Life and health sciences.

3.8 The policy justification recognises that these industries have already shown strong growth within the city and the Council sees benefit in supporting further managed expansion. This includes “facilitating opportunities for development and directing them to zoned employment areas that are well-located in terms of infrastructural connectivity and distribution networks”⁴⁴. The draft LDP also confirms the Council aim of clustering high growth sectors to ensure maximum growth over the plan period⁴⁵.

Policy EC2 - Employment Land Supply

3.9 Policy EC2 plans for a total of 550,000 sq m of gross developable land (floorspace) for employment uses over the period from 2020-2035.

⁴² *Ibid.* p. 144

⁴³ *Ibid.* p. 145

⁴⁴ *Ibid.* p. 146

⁴⁵ *Ibid.*

- 3.10 The overall total is allocated as follows:
- 330,000 sq m to City Centre
 - 82,000 sq m to Belfast Harbour
 - 138,000 sq m across the rest of the city
- 3.11 This is confirmed to take into account demand for employment space versus uptake of employment space. Para 8.1.19 confirms the approach taken with forecast demand having been adjusted to reflect take-up rates over the past three years, to calculate a minimum need for approximately 37,000 sq m per annum and 550,000 sq m overall between 2020 and 2035.
- 3.12 The Council seeks to further justify the land supply policy with reference to the assessed minimum need for 550,000 sq m of employment floorspace, and their intention *“to provide an adequate supply of land on sites in a range of locations, sizes and conditions, to attract investment into the city and to support existing business sectors”*⁴⁶.
- 3.13 Although no allowance is made for existing capacity the *“substantial oversupply of employment space”* is noted at Para 8.1.18, and is therefore considered to form part of the Council’s justification for the Policy approach.

Policy EC3 - Major employment and strategic employment locations

- 3.14 Policy EC3 deals with employment uses within Belfast’s supply of Major Employment Locations (MEL) and Strategic Employment Locations (SEL) and is intended to enable Belfast to compete for investment in new employment sectors, and to provide opportunities for Belfast-based companies to expand through the provision of high-quality sites across the Council area.
- 3.15 Policy EC3 confirms that light industrial, general industrial, storage and distribution and other appropriate sui generis employment uses will be directed towards Major Employment Locations (MEL) and Strategic Employment Locations (SEL).
- 3.16 In regards to office provision, the Policy states that Use Class B1(a) shall only be permitted in MEL where it cannot be accommodated in a city centre location and it would otherwise result in the loss of significant investment.

Policy EC6 - Office Development

- 3.17 Policy EC6 sets policies for office development in Belfast over the plan period. Its principal aim is to focus office development in Belfast City Centre. This is based on the *‘Council’s policy, in line with the SPPS, to support the promotion of Belfast City Centre as the primary location for office development in order to reinforce the role of Belfast as a regional city’*.
- 3.18 Outside the city centre the policy introduces a threshold of no more than 400 sq m except in MEL or SEL where B1(a) offices will only be permitted where it cannot be

⁴⁶ *Ibid.* p147

accommodated in a city centre location and would otherwise result in the loss of significant investment. Belfast Harbour, including Titanic Quarter, is a MEL and therefore future development proposals will be regulated by these policies.

- 3.19 The Policy also states that outside of designated areas developments of above 1,000 sqm outside of the city centre are required to comply with the sequential test and impact tests set out in policy RET2.
- 3.20 The Policy approach, which makes no allowance for additional office floorspace at Titanic Quarter, also appears to be informed by the recommendation of the Office Study, which concludes that *“given the level of vacancy within the city centre and pipeline supply of extant and pending planning applications for office development, there should be no allowance for additional offices at Belfast Harbour, Titanic Quarter or other existing employment locations unless ancillary to the main use”*⁴⁷.
- 3.21 This conclusion is strongly contested, and in the context of market evidence by CBRE later within this report, is not considered to provide a robust justification for the Policy approach.

Spatial Development Strategy

- 3.22 The LDP’s Spatial Development Strategy sets out how the council will manage the spatial growth for the plan area.
- 3.23 Whilst the LDP primarily seeks to concentrate growth within the city centre, the LDP’s Spatial Development Strategy also identifies the Waterfront District (within which the Titanic Quarter lies) as an area which *“provides the opportunity to extend the city centre eastwards to better activate the river Lagan”* and where *“the opportunity exists to take advantage of the waterside location for comprehensive mixed-use regeneration”*⁴⁸.
- 3.24 The spatial development strategy highlights that the various identified districts will be connected to one another, helping to deliver a compact city centre that is liveable, attractive to businesses, and appealing to visitors.
- 3.25 The contribution of Titanic Quarter is also recognised under Policy SD2 which states that *“The regeneration of Titanic Quarter has also helped establish the harbour estate as a major tourist destination and has introduced a more diverse range of uses, including office accommodation, apartments, retail, and education facilities”*⁴⁹. Whilst the draft LDP makes a distinction between the City Centre (defined by the inner ring road, orbital boulevard and the east bank of the River Lagan) and the Harbour Area⁵⁰, it is notable that the LDP Preferred Options Paper (POP) published by Belfast City Council in January 2017 highlights the need for a:

⁴⁷ Belfast City Council (2018) Belfast Local Development Plan Office Study, p5

⁴⁸ *Ibid.* p. 56

⁴⁹ Belfast City Council (2018) Belfast Local Development Plan Draft Strategy 2035, para 6.2.11

⁵⁰ *Ibid.* p. 150 (Fig. 8.2)

“Flexible approach to those properties and locations adjoining any proposed boundary, not necessarily precluding changing land use but to ensure connectivity and integration of uses. Our city centre boundary could reflect the potential of the river and adjoining areas to act as a focus and enhance accessibility to our waterfront as a city asset”⁵¹.

Summary

- 3.26 In alignment with the regional and local strategic economic objectives identified in Section 2, the LDP outlines an ambitious approach to economic development, seeking to support and drive growth in employment and productivity in identified sectors of strength. Maintaining an adequate supply of employment land of the type and size required to support these industries is considered a priority in order to attract new businesses and investment and enable the scale-up of existing enterprises.
- 3.27 Whilst the plan’s Spatial Development Strategy seeks to focus on the city centre as the key growth location, it also recognises the important role that the Waterfront District can play in supporting its growth, stating that the area is a “*valuable amenity*”⁵² which offers potential to extend the city centre and maximise the benefits of the River Lagan.
- 3.28 As currently drafted the LDP appears to undermine this opportunity, seeing as its *Policy EC6: Office Development* and its related Office Development technical paper potentially constrain the development of high-quality employment space in the Titanic Quarter, despite its location within the Waterfront District and its proven role as a destination for offices.
- 3.29 The robustness of this justification for these policies is therefore considered in more detail throughout this report.

⁵¹ Belfast City Council (2017) Belfast Local Development Plan Preferred Options Paper, p. 70

⁵² *Ibid*, , p. 56

4. The Assessed Need for Employment Floorspace

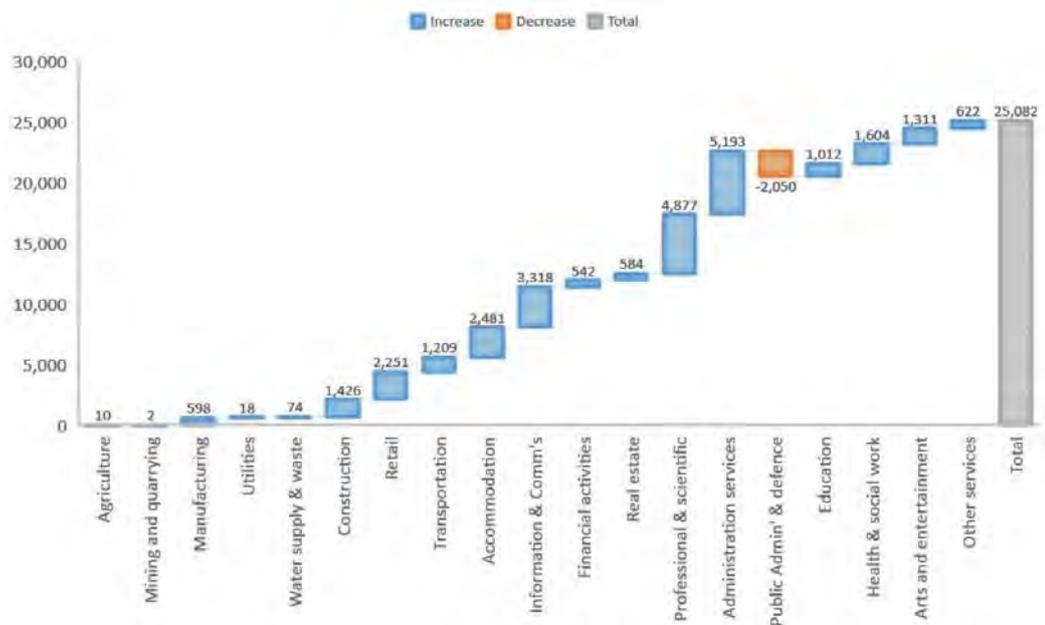
4.1 This section introduces the Council’s evidence-based assessment of the need for employment space in Belfast, and its translation into the overall level of provision proposed in Policy EC2. Whilst being generally positive, it is considered that the approach and assumptions applied could underplay need for employment space over the plan period. The limitations and wider implications of the approach taken by the Council are considered in more detail below.

Assessment of Employment Space Requirements

4.2 The draft LDP aims to provide the employment space needed to support 46,000 additional jobs in Belfast over the emerging plan period (2020 – 2035). This is based on an assessment by Ulster University⁵³ (UU), which was underpinned by forecasts developed by its Economic Policy Centre in 2016.

4.3 The baseline scenario suggested growth across almost all industrial sectors, with the exception of public administration and defence. The strongest absolute growth is forecast in administrative, professional and scientific jobs, with significant job creation also anticipated in the information and communication sector. This is shown in the chart below, which replicates Figure 3 of the UU report.

Figure 4.1: Forecast Employment Change by Industry (Baseline; 2016 – 2030)



Source: Ulster University, 2016

⁵³ Ulster University (2016) Belfast City Council: Assessing Employment Space Requirements across the City – 2015-2030

- 4.4 The study assessed employment space requirements over the period from 2015 to 2030, which evidently differs from the plan period of the LDP (2020 – 2035) and indeed the period over which the above chart presents change (2016 – 2030). The Council has sought to partially reconcile this misalignment within its Technical Supplement on Employment and the Economy⁵⁴, by presenting analysis over an extended period (2016 – 2035).
- 4.5 The UU report details the approach taken to convert both the baseline and upper employment forecasts to floorspace requirements. This is based on:
- **The assignment of industrial sectors to use classes.** This assumes, for example, that forecast growth in education, health, social work and real estate is entirely accommodated through provision of general office space (B1a). Public administration jobs are also wholly assigned to office space, albeit the forecast decline in this sector under the baseline scenario (Figure 4.1) infers that such space will be vacated to support growth in other sectors. Over half of jobs relating to ICT, professional or scientific activities and administration are expected to require general office space;
 - **The application of employment densities to convert jobs to floorspace.** This draws upon guidance produced by the former Homes and Communities Agency⁵⁵ (HCA), and assumes that between 8 – 13sqm of general office space is needed to accommodate employees in relevant sectors; and
 - **Sensitivity analysis to allow for the absorption of employment growth through current provision.** This is based on the premise that *'many businesses will expand within their current footprint and vacant property will also be absorbed, if fit for purpose'*⁵⁶. Employment space requirements are reduced by 10-20% through these sensitivities, albeit with acknowledgement that *'these assumptions can be revised should data become available'*.
- 4.6 The Technical Supplement is understood to have taken a consistent approach, and indicates that between 486,400sqm and 1,118,286sqm of employment space will be needed in Belfast between 2016 and 2035. This is inclusive of a need for 226,914-510,286sqm of general office space.

⁵⁴ Belfast City Council (2018) Belfast Local Development Plan Technical Supplement 3: Employment and Economy

⁵⁵ HCA (2015) Employment Density Guide, third edition

⁵⁶ Ulster University (2016) Belfast City Council: Assessing Employment Space Requirements across the City – 2015-2030, p6

Table 4.1: Calculated Demand for B Use Class Employment Space (2016 – 2035)

Scenario/sensitivity	General offices (B1a)	Total B use classes	B use classes per annum
Upper scenario	510,286sqm	1,118,286sqm	58,857sqm
Upper scenario (-10%)	459,257sqm	1,006,457sqm	52,971sqm
Upper scenario (-20%)	408,229sqm	894,629sqm	47,086sqm
Base scenario	283,643sqm	608,000sqm	32,000sqm
Base scenario (-10%)	255,279sqm	547,200sqm	28,800sqm
Base scenario (-20%)	226,914sqm	486,400sqm	25,600sqm

Source: Belfast City Council, 2018

- 4.7 Figure 9 of the Technical Supplement further explains how the above calculations have been reconciled with the emerging plan period, confirming that the draft LDP is based on the core base scenario – rather than the presented sensitivities – which is annualised to 32,000sqm and extrapolated over a shorter period from 2020. Allowance also appears to have been made for any shortfall which could arise from a continuation of current build-out rates until 2020. This is summarised in the following table, and evidently produces the overall need figure (550,000sqm) that forms the basis for the LDP.

Table 4.2: Employment Land Supply Calculations

	Total	Annual
Floorspace needed (2016 – 2035)	608,000sqm	32,000sqm
Floorspace needed (2020 – 2035)	480,000sqm	32,000sqm
Floorspace needed (2016 – 2019)	128,000sqm	32,000sqm
Floorspace to be built* (2016 – 2019)	56,000sqm	14,000sqm
Anticipated shortfall (2016 – 2019)	72,000sqm	18,000sqm
Need plus shortfall (2020 – 2035)	552,000sqm	36,800sqm
Rounded (2020 – 2035)	550,000sqm ⁵⁷	37,000sqm

Source: Belfast City Council, 2018

* estimated based on build-out in 2015/16

⁵⁷ This represents the assessed **minimum need** for employment floorspace as confirmed at Para 8.1.19 of the LDP DPS

Limitations of the Approach

Type of employment space needed

- 4.8 The outcome of the above calculation forms the basis for Policy EC2, which quantifies a minimum need for 550,000sqm of employment space across *all* B use classes and indicates that this *'shall be provided over the plan period to meet the needs of the city'*⁵⁸.
- 4.9 The draft LDP does not break down this need to different types of B uses, and as a result policies take no account of the different type of employment space that may be needed. This is a significant omission, which inherently but unjustifiably assumes that any type of B use employment space in Belfast would meet the needs of any type of business. This fails to recognise that the requirements of office-based employers differ considerably from logistics businesses, for example.
- 4.10 Robustly evidencing the needs of different types of businesses is considered to be critical in meeting the requirements of the SPSS, which states that:
- "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**"*⁵⁹
(emphasis added)
- 4.11 Baseline employment forecasts form the original basis for the Council's calculations, which have enabled a breakdown into different use classes at various points within its evidence base including the Technical Supplement. The Council could therefore have continued to provide such a breakdown, and only ceased to provide this detail at a late stage once past build-out rates were integrated within its calculations. The integration of such a flat rate – which was not broken down by B use class – now appears to inhibit disaggregation, which would not be the case had a more robust approach been taken.
- 4.12 The Council's Office Study⁶⁰ has attempted to isolate the specific need for offices, through the presentation of a similar calculation which suggests that circa 213,000sqm of office space is needed across Belfast over the plan period. Although similar, the approach is not identical because:
- It draws its baseline forecast from a period (2016 – 2030) which differs from that presented in the Technical Supplement (2016 – 2035), and therefore takes an inconsistent approach in extrapolating need to 2035. This variant approach is not acknowledged or explained; and
 - It calculates the historic "shortfall" of office space by inputting an average of past annual build-out over *two* years, rather than the single year's data drawn upon by the Technical Supplement. As a result, it assumes a level of build-out (c.20,000sqm) which exceeds the allowance made within the draft LDP and the Technical Supplement (c.14,000sqm). This is counterintuitive given that the latter should by definition capture *more* floorspace, beyond simply office space.

⁵⁸ Belfast City Council (2018) Belfast Local Development Plan Draft Plan Strategy 2035, p147

⁵⁹ Department of the Environment (2015) Strategic Planning Policy Statement for Northern Ireland, paragraph 6.92

⁶⁰ Belfast City Council (2018) Belfast Local Development Plan Office Study, Figure 16

- 4.13 Such inconsistencies are not explained but fundamentally detach this calculation from the overall need figure in the draft LDP, restricting comparison between their concluded figures. It therefore cannot be considered to provide the missing detail on the type of employment space needed, not least because the draft LDP gives no indication of this calculation having informed any of its proposed policies. Indeed, the draft LDP does not reference the calculated need for office space.
- 4.14 The lack of detail on the type of employment space needed means that it is not possible to appraise the extent to which supply could be developed to meet the needs of different types of businesses. This is explored further in section 5 of this report.

Underestimating the employment space needed

- 4.15 A review of the full evidence base raises concerns around the extent to which the provision of 550,000sqm of B use employment space could actually support forecast baseline growth, with such an outcome potentially having been caused by the numerous adjustments and assumptions applied by the Council in its calculations. In 2016, the original UU report⁶¹ concluded that:
- Providing around 448,000sqm of B use space could support the creation of circa 25,000 jobs over 14 years (2016 – 2030); and
 - Around 824,000sqm of B use space would be needed to support the creation of circa 45,000 jobs over the same 14 year period.

- 4.16 It is acknowledged that variation in the forecast period and the sectoral profile of growth affects the overall quantum of employment space needed, albeit it is unclear whether the Council has precisely accounted for such factors within its evidence base. Even at a high level, however, there is a notably close alignment with both the Council’s target of supporting 46,000 jobs, and to a lesser extent its emerging plan to provide 550,000sqm of employment space. These targets and calculations are based on a similar length of time⁶². The UU report therefore clearly highlights the possibility that:
- A considerably larger amount of employment space – in excess of 800,000sqm – will be needed to support job creation of the scale targeted by the Council; and
 - Limiting provision to the level proposed by Policy EC2 would not support substantially more than 25,000 additional jobs over the plan period.

Reliance on a single approach for quantifying requirements

- 4.17 Whilst employment forecasts are a credible tool for establishing future floorspace requirements, they should not be considered in isolation. Analysing the past take-up of

⁶¹ Ulster University (2016) Belfast City Council: Assessing Employment Space Requirements across the City – 2015-2030; Figure 3, Figure 4 and Table 3

⁶² The LDP provides employment space over a *fifteen* year period from 2020 to 2035; the UU report calculates need over a *fourteen* year period from 2016 to 2030

employment land can also provide valuable evidence on the requirements of commercial property markets⁶³.

- 4.18 The Technical Supplement references a current build-out rate of 14,000sqm across all types of B use employment space in Belfast⁶⁴. Extrapolating this rate over the plan period (2020 – 2035) would suggest a need for 210,000sqm to sustain this current rate of build-out. This falls below the level of need concluded by the Council, but is based on a single year that may not be representative of longer-term market trends in Belfast.
- 4.19 As previously highlighted, such a flat average rate takes no account of the specific requirements for different types of employment space. This can, however, be further explored through reference to the build-out figures presented in the Council’s Office Study⁶⁵. This suggests that some 18,417sqm of office space was built-out in 2016, increasing to 21,478sqm in 2017. Sustaining the average rate of build-out over these two years would require close to 300,000sqm of office space in Belfast over the plan period (2020 – 2035). This could be closer to 325,000sqm where the higher build-out rate is sustained for fifteen years.
- 4.20 While this cannot be directly compared with the overall need figure presented in the LDP, it is notable when comparing with the calculations presented in the Technical Supplement – and earlier summarised at Table 4.1 of this report – that this exceeds the scale of need for office space suggested by the baseline forecasts (283,643sqm 2016 – 2035; 14,929sqm per annum). While the Office Study interprets this as an oversupply of office space relative to the forecasts⁶⁶, it could actually signal an underestimation of the office space needed to support the Belfast economy.
- 4.21 Indeed, the forecasts appear to assume that the average current build-out of office space falls from its current levels by 25%, without justification, interrogation or acknowledgement of this implicit assumption. This evidently contrasts with the recent growth recorded by the Council, and market signals of strong demand in the office sector which are reviewed elsewhere in this report.

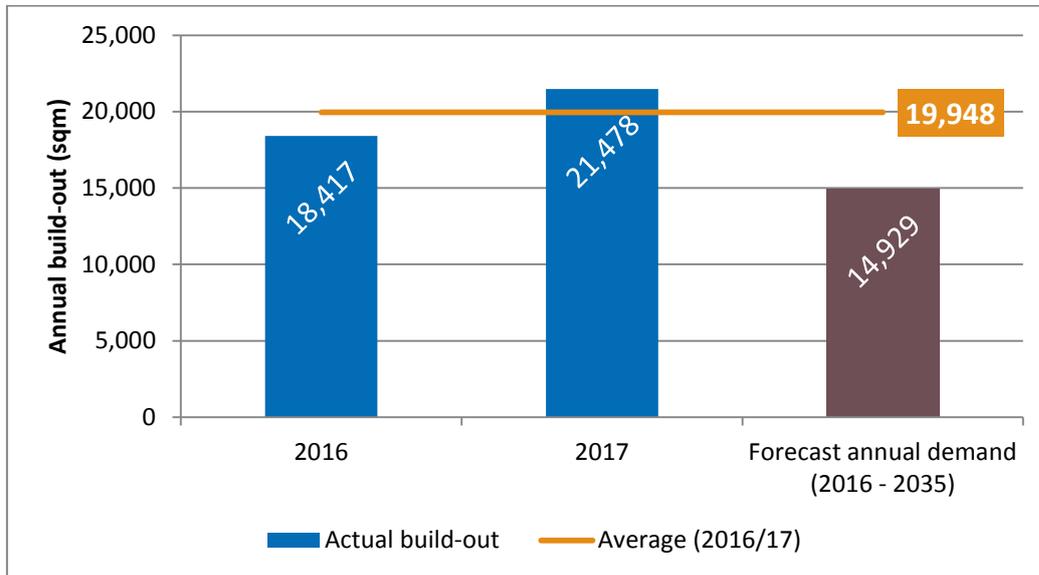
⁶³ This approach has previously been recognised in Planning Practice Guidance for England (paragraph 2a-032-20140306)

⁶⁴ Belfast City Council (2018) Belfast Local Development Plan Technical Supplement 3: Employment and Economy, Figure 9

⁶⁵ Belfast City Council (2018) Belfast Local Development Plan Office Study, Figure 16

⁶⁶ Figure 16 of the Office Study calculates that completions have exceeded ‘*forecasted demand*’ from 2016, and therefore applies a negative ‘*timeline adjustment*’ which reduces the amount of office space needed in future

Figure 4.2: Comparing Current and Assumed Future Build-out of Office Space in Belfast



Source: Belfast City Council (Technical Supplement; Office Study)

Allowing for choice and flexibility

- 4.22 The approach taken by the Council solely aims to accommodate forecast job growth, without any buffer.
- 4.23 It is widely considered best practice to add a margin of choice and flexibility when calculating the floorspace needed to support employment forecasts. This additional space and land provides businesses and developers with a reasonable choice of sites, and allows for delays in sites coming forward or premises being developed. Without a buffer, any delay of this nature risks constraining job growth due to a shortage of available space.
- 4.24 Establishing a robust margin of choice is not an exact science, and requires a degree of judgement. Allowances can be made through reference to past build-out rates – to provide an additional five years’ supply for example – or through a proportionate uplift to the calculated quantum of employment floorspace needed.
- 4.25 It is noted that such allowances for choice and flexibility have been made in other UK cities. For example:
 - The Employment Land Study produced for **Cardiff** incorporates a 10% margin to ‘provide occupiers with choice in the marketplace’ and ensure ‘some flexibility to accommodate the frictional movement in the property market (allowing the market to move as one occupier vacates a property and another moves in behind it with some delay for fit out etc)’⁶⁷;

⁶⁷ DTZ (2011) Cardiff Employment Land Study Update Stage 2: Assessing Future Requirements

- A ‘*safety margin equivalent to five years of net take up*’ was applied in **Sheffield** to reflect the ‘*considerable uncertainty regarding the availability and deliverability*’ of legacy employment sites, and other sites that ‘*require extensive clearance and remediation prior to any redevelopment [which] increases lead-in times for the provision of employment space*’⁶⁸;
- In **Leicester**, a five year margin based on past employment land delivery is applied. This accounts for the ‘*level of vacant floor space*’ typically seen in functioning markets, the margin for error associated with the forecasting process, the need to facilitate competition in the property market and the need for flexibility to allow for delays in sites coming forward⁶⁹. The same rationale is stated in applying a comparable margin within the **Liverpool City Region** Strategic Housing and Employment Land Market Assessment, noting that this was undertaken by the same consultants⁷⁰.

4.26 With the Council’s calculations of employment space requirements applying no margin, the draft LDP therefore provides no flexibility in this regard. Provision for only 550,000sqm of employment space will therefore limit its ability to respond to market changes or increased demand in Belfast.

Summary and Policy Implications

4.27 Policy EC2 aims to support 46,000 additional jobs in Belfast by providing a total of 550,000sqm of space for B class employment uses. The calculation of this overall need can be traced back to a baseline employment forecast developed by Ulster University, although the Council has applied a number of further adjustments and assumptions in its subsequent calculations.

4.28 The Council’s focus solely on the *overall* need for employment floorspace means that this policy takes no account of the different types of space that may be needed, eliminating important detail that should have been taken into account in developing the strategy for the LDP and other policies. The approach taken in calculating this overall figure prevents disaggregation, and the Council’s attempt to provide such a breakdown for the office sector takes an inconsistent approach which therefore cannot be directly compared and indeed is not referenced in the draft LDP. There is a clear risk that the LDP will not provide in full the *type* of employment space needed in Belfast to support job growth across different sectors. It takes no account of the specific locational or site-specific needs of those occupying offices or distribution centres, for example, even though the needs of such businesses are likely to vary considerably.

4.29 Furthermore, the analysis in this section indicates that this overall minimum need figure of 550,000sqm underestimates the employment space needed in Belfast to support future job growth. This conclusion is based on:

⁶⁸ NLP (2015) Sheffield and Rotherham Joint Employment Land Review, paragraph 8.52

⁶⁹ GL Hearn (2017) Leicester and Leicestershire Housing and Economic Development Needs Assessment, paragraph 11.14

⁷⁰ GL Hearn (2017) Liverpool City Region Strategic Housing and Employment Land Market Assessment, paragraph 11.28

- **Evidence prepared by UU**, which suggests that over 800,000sqm of employment space will actually be needed to support job creation of the scale targeted (i.e. circa 45,000 jobs) by the Council over a similar period of circa fifteen years. This far exceeds the estimate made by the Council, raising concerns about the robustness and realism of its subsequent calculations and adjustments;
- **The limitations of a reliance on only one approach, linked to employment forecasts.** This can be illustrated through reference to the past build-out of employment space in Belfast, with exploration of such an approach within this section highlighting that this could lead to a notably higher demand for office space in particular; and
- **The omission of any buffer to allow a margin of choice and flexibility**, which leaves the draft LDP exposed to changes in market demand or delays in sites coming forward for development.

4.30 While this likely underestimation of the overall quantum of employment space needed in Belfast has direct implications for Policy EC2, it has wider consequences elsewhere in the draft LDP. The restrictive approaches taken in Policies EC3 and EC6, for example, appear premised on a belief that there is a *'substantial oversupply'* of employment space in Belfast⁷¹. The scale of this perceived *'oversupply'* would diminish when compared with a higher overall need for employment space, or where a more detailed level of analysis identified that the supply did not provide the type of space needed by growth sectors. In either circumstance this would require a more flexible approach to employment space provision in the LDP.

⁷¹ Belfast City Council (2018) Belfast Local Development Plan Draft Plan Strategy 2035, paragraph 8.1.18

5. The Assessed Supply of Employment Floorspace

- 5.1 This section introduces the Council's assessment of the pipeline supply of employment floorspace in Belfast, drawing specifically on the findings and recommendations of the Belfast Urban Capacity Study (UCS)⁷².
- 5.2 The Urban Capacity Study forms an important part of the evidence base for the emerging LDP to meet the requirements of the Strategic Planning Policy Statement (SPPS) for Northern Ireland. In preparing the study the authors (Ove Arup and Partners Ltd) have also considered planning practice guidance for England and Wales with the methodology subsequently based around the stages of the Housing and Employment Land Availability Assessment (HELAA) methodology.
- 5.3 The study identifies two types of employment site:
- **Committed sites**, drawing on existing employment zonings set in the dBMAP as well as sites with an existing planning permission (outline or full) at June 2017.
 - **New Sites**, identified through consolidation of a number of sources of information including vacant land which has not been previously developed; derelict buildings which have previously been develop; potentially incompatible land uses; combinations of separate, possibly underutilised sites; Sites in Council ownership; sites owned by Government Departments and Agencies; and land identified for future employment use in non-statutory Masterplans,
- 5.4 For the purposes of identifying and grouping sites, the study identifies six key character areas within the Belfast Urban Area. Titanic Quarter is identified as one of the six and described as a *“major mixed use development site which has the potential to accommodate major residential and employment use”*⁷³.
- 5.5 The other five character areas include:
- Belfast City Centre – as defined in the dBMAP;
 - Inner City – areas surrounding the city centre;
 - Strategic Centres – Local and district centre zonings from dBMAP merged and with a 200m buffer;
 - Arterial Routes – dBMAP designated arterial routes with a 50m buffer either side; and
 - Wider Urban Area – remaining areas outside other character areas delimited by the urban footprint boundary.

⁷² Arup on behalf of Belfast City Council (2018) Urban Capacity Study

⁷³ *Ibid.* p12, Table 1

- 5.6 It is notable that the wider Belfast Harbour area is not identified as a separate character area for the purposes of the assessment, with the area instead forming part of the wider urban area assessment.

Assessment results

- 5.7 The UCS identifies approximately 1.16million sq m of employment floorspace from committed and new sites, including 349,848 sq m of employment floorspace within the city centre. This includes 203,482 sq m of capacity within the city centre from committed sites and a further 146,366 sq m from new employment sites.
- 5.8 A further 100,000 sq m is identified from committed sites at Titanic Quarter, although the UCS does not indicate how this figure is calculated. It is also notable that potential contribution of new employment sites at Titanic Quarter has been overlooked, despite Titanic Quarter being identified within the Belfast City Centre Regeneration and Investment Strategy as a location suitable for office development.

Table 5.1: Indicative yield from identified committed and new employment sites

	Employment sites (sq m)			Total
	Committed	Sites in existing employment locations	New Employment sites	
City Centre	203,482		146,366	349,848
Titanic Quarter	100,000			100,000
Inner City		10,946		10,946
Wider City		326,601	278,765	605,366
Arterial routes		82,301		82,301
Strategic Centres		7,383	11,882	19,265
Total	303,482	421,819	437,013	1,162,314

Source: Adapted from Urban Capacity Study, March 2018

- 5.9 The UCS reports that the supply increases to approximately 1.9million sq m should all those sites suitable for either employment or housing come forward for employment uses.

Limitation of the Approach

- 5.10 The UCS is open in highlighting the limitations of the approach which is based on “a high-level assessment only”. It goes on to state that “further consideration of net developable areas and the appropriate quantum of development should be considered

*in liaison with landowners etc. at later stages of the LDP making process*⁷⁴. Evidently, therefore, its findings should be treated with some caution.

5.11 There is also concern that the approach taken within the UCS leads to employment floorspace capacity in the city centre being overstated. This conclusion is reached on the basis of:

- **The limited appreciation given to the available supply across different typologies of floorspace.** The UCS makes no distinction between the different types of employment floorspace that might be accommodated on a particular site making it difficult to deduce the overall quantum of office floorspace that is potentially suitable, available and achievable over the plan period. A more detailed breakdown of the different types of employment space by use class required in each location would evidently aid interpretation and make conclusions regarding the supply demand balance far more robust and credible.
- **The overly ambitious estimates of employment yields.** The UCS confirms that office floorspace capacity in the city centre is based on an average density of 39,607 sq m of office floorspace per hectare. This implies a plot ratio of nearly 400% on all new sites and appears to be disproportionately high. For example plot ratios of up to 200% have been applied in similar studies⁷⁵ to reflect high density city centre development. The approach taken has the potential to significantly inflate the implied future supply of office floorspace from new sites by as much of 50%.
- **The reliance on housing and employment sites.** Where sites might be suitable for more than one use or for mixed use development, the reported yield in the UCS is the maximum (i.e. what could be delivered if the site was used for that use only). Whilst this has potential to increase capacity by a further 595,741 sq m it is considered highly unlikely that all of this land would be developed exclusively for employment use. Given this context, and concerns raised within bullet point 1 above, this supply should be treated with caution and not relied upon for policy formulation.
- **The misplaced assumption that all committed sites will be developed over the plan period.** CBRE monitoring suggests that the supply of speculative floorspace in the City Centre coming through planning has been low. While a number of developers have indicated an interest in commencing construction of new build schemes, all of these require an element of pre-letting to allow for a trigger of construction. It is notable that funders typically seek a 50% pre-letting in order to secure funding at levels required by most of the private local developers who dominate the Belfast office market. For this reason, CBRE see limited scope for a significant proportion of offices being delivered without a pre-letting of 50% in advance. There is also no guarantee that pending applications will secure

⁷⁴ Arup (2018) Urban Capacity Study, para 3.26

⁷⁵ Sheffield City Council's Employment Land Review was prepared by Lichfields and assumes that "higher density city centre developments" have a plot ratio of 2.0

planning approval, reducing the reliance that should be placed on such schemes until planning is secured.

- **The inaccuracies in the recording of committed site employment yields.** Turley monitoring and research indicates that the supply of committed sites is based on a number of erroneously recorded floorspace yields, which in combination reduce the reported city centre committed pipeline of 203,482 by 17% to around 168,000 sq m. Deducting schemes which have since completed since June 2017 would reduce this further to around 110,000 sq m, although it is acknowledged that a number of new schemes would have also secured planning permission over the intervening period.

- 5.12 It is notable that the more recent estimates for office floorspace capacity in the city centre are presented within the Office Study⁷⁶. This concluded a smaller pipeline of committed sites, equivalent to 175,000 sq m, and a larger potential pipeline comprising 272,603 sq m of sites in planning but yet to be determined. In combination this equates to a pipeline of over 447,000 sq m.
- 5.13 In the absence of a detailed breakdown of sites it is not possible to verify the accuracy of these estimates. CBRE monitoring suggests that a supply comprising 285,187 sq m of committed sites, with a further 192,715 sq m from the potential pipeline is a more realistic estimate. A breakdown of this supply is summarised in Appendix 1 and Appendix 2 and shows that schemes at Titanic Quarter account for around 35% of the pipeline, with the area evidently representing an important component of the forward supply.
- 5.14 If schemes at Titanic Quarter were to be separated out (as per the methodology in the Urban Capacity and Office Studies) then the “City Centre” pipeline would reduce by 94,392 sq m to around 383,510 sqm. This evidently reduces the pipeline supply of extant and pending planning applications in the City Centre reported in the Office Study by around 63,500 sq m, making the supply demand balance more sensitive to schemes not being delivered and limiting the choice of accommodation for prospective occupiers over the plan period.

Summary and Policy Implications

- 5.15 The stated oversupply of employment floorspace forms one of the main justifications for Policies EC3 and EC6 and the limitations placed on additional office floorspace provision at Titanic Quarter. It is notable, however, that the UCS assessment is extremely sensitive to the assumptions applied and based on current delivery constraints there is no guarantee that the identified pipeline supply will be delivered.
- 5.16 In the context of the concerns raised above regarding the employment floorspace yield on new sites, there is also a risk that there will be limited flexibility over the longer term to meet stated employment space requirements; this being to the detriment of the stated growth ambitions for Belfast and Northern Ireland more widely.

⁷⁶ Belfast City Council (2018) Office Study, para 5.14

- 5.17 Together these factors have the effect of over-stating the floorspace capacity and pipeline supply being used as justification for the economic policies within the draft LDP. The high level nature of the assessment informing the plan's policies and questions raised over the reliability of the assumptions applied, evidently limits confidence in the scale of the stated over-supply against need used by the Council to justify the inflexible and restrictive approach advanced through these policies.
- 5.18 In conclusion it is considered that Policies EC3 and EC6 are not substantiated by the evidence and risk unduly constraining investment and the provision of employment floorspace being targeted within Policy EC2. A more flexible approach is required to mitigate against demand not being met as a result of insufficient choice within the supply of new floorspace.

6. Market Trends and Occupier Requirements

- 6.1 This section considers trends in the supply of, and demand for, office floorspace in Belfast. This draws on evidence prepared by Belfast City Council, supplemented with updated evidence prepared by leading agents and market commentators CBRE.
- 6.2 Whilst the Council's consideration of office market trends is a positive step, it is somewhat lacking in its appreciation of nuances in demand across different sectors and locations. The CBRE analysis addresses this important gap and indicates a significant scale of demand for Grade A office floorspace across Belfast City Centre and beyond that is at risk of not being met through the current policy approach.

Review of the Council's Market Evidence

- 6.3 The Office Study, published in August 2018, considers overall levels of supply and demand to project the floor space requirements for Belfast over the plan period. This evidence has subsequently been used to inform the draft policies and justify the spatial thresholds in Policy EC6.
- 6.4 The study indicates strong underlying demand and a generally buoyant office market across Belfast. The analysis is also clear in highlighting a number of important market issues that the LDP must respond to. This includes:
- The strong and increasing levels of office floorspace take up. Over the period from 2011 to 2017 2.46 million sq ft of office floorspace was taken up in Belfast, equivalent to an annual average of 351,741 sq ft (or 32,677 sq m). Take up so far in 2018 is reported to be the highest half year take up on record.
 - The strong demand for high quality space with Grade A stock accounting for 78% of take-up, in the context of a general undersupply of such space across the city.
 - Belfast's success in attracting Foreign Direct Investment (FDI). This has been driven primarily by the technology, media and telecoms (TMT), with the sector responsible for 47% of take-up in H1 2018.
 - The latent demand from multi-national and indigenous companies widening their range of services and facilitating back office functions;
 - The upward pressure on rents for Grade A floorspace which have now reached £20 per sq ft.
 - The number of long-term requirements remaining unfulfilled ranging from 30,000 sq ft (2,787 sq m) to 150,000 sq ft (13,935 sq m). This includes a requirement for new build stand-alone office buildings or significant portions of large scale developments to accommodate demand;
 - The appeal of Waterfront locations. The evidence suggests that Grade A office developments at the City Quays scheme are nearing full occupancy, indicating strong latent demand for office space in the Harbour Area.

6.5 Notwithstanding the above, it is considered that the evidence is deficient in its consideration of a number of trends, including:

- **The implications of a continuation of current take up levels.** On the basis that the current level of take up is sustained, it is estimated that take up in Belfast City Centre could reach over 490,000 sq m over the 15 year period from 2020 to 2035. This increases to over 500,000 sq m, if H1 2018 take up figures are taken into account. Whilst the provision of 330,000 sq m of new Grade A floorspace (as currently proposed in Policy EC2) has the potential to accommodate a significant proportion of this demand, it will only provide 11.6 years-worth of supply⁷⁷ when benchmarked against recent uptake of floorspace within the city centre. It is not clear how any shortfall would be accommodated given the likely non-delivery of some pipeline schemes and lack of choice and suitability within the existing supply of vacant stock.

Table 6.1: Take Up of Office Space in Belfast City Centre

Year	Sq ft	Sq m
2011	263,679	24,496
2012	273,624	25,420
2013	401,484	37,298
2014	348,548	32,380
2015	309,543	28,757
2016	435,306	40,440
2017	430,000	39,947
Total	2,462,184	228,737
Average per annum	351,741	32,677

Source: Adapted from Figure 11 of Office Study, 2018

- **The drivers of floorspace vacancy.** The Office Study considers vacancy rates within the existing stock of office floorspace, concluding an overall office vacancy rate of 7.2%, with Grade A vacancy at 3.1%. The study goes on to conclude that data from Land and Property Services shows that there is estimated to be 739,800 sq m of office floorspace in the city centre, with 114,127 sq m registered as vacant. A vacancy rate of 15.4% is subsequently reported. This is significantly higher than the 3.1% vacancy within the Grade A supply. The analysis also suggests that just over half (67,000 sq m or 58%) is available for occupation. It is notable that a large proportion of this available floorspace comprises lower quality Grade B / secondary office space that is likely to be unsuitable for modern business occupiers. This distinction is not made within the study, with the study and Draft LDP unduly relying on the higher vacancy rate, with no consideration as to the quality and market attractiveness of vacant stock, to justify the policy approach.

⁷⁷ Assumes Grade A continues to account for 78% of take up in line with recent trends

- **The location and property requirements of key growth sectors.** The current approach masks important nuances in demand across different sectors and locations. As a result the varying needs of different business sectors are not adequately captured in the evidence base. As a result the evidence base and its recommendations appear to conflict with the wider economic growth agenda and investment priorities established for Belfast and the wider Northern Ireland economy set out in section 2 of this report. For example, Catalyst Inc. innovation hub (formerly Northern Ireland Science Park) is located within the Titanic Quarter, providing support for innovation-led, high-growth; knowledge based businesses and provides links with the universities, colleges and research centres. Although the potential its expansion is recognised, alongside a wider aspiration to ‘enable innovation / creative hubs’, based on the current evidence it is not clear how the needs of these businesses have been assessed and will be catered for given the restrictions placed on office related development proposed under Policy EC6.
- **The deliverability of the pipeline supply.** Although the study suggests there is a strong pipeline of 175,000 sqm of extant permissions within the city centre and a potential pipeline of 272,603 sq m these figures are not substantiated with appropriate evidence. As concluded in section 5, the pipeline is considered to be over-stated raising questions over the reliability of these estimates as justification for the stated policy approach.
- **The future role of Titanic Quarter.** Notwithstanding Titanic Quarters role as a major tourist destination and a location offering a diverse range of uses, including office accommodation, apartments, retail, and education facilities’, there is limited appreciation of Titanic Quarter’s potential future role in accommodating major employment development. Despite its proximity to City Quays, the study notes that Titanic Quarter is viewed in the evidence base as being a “*peripheral location*”. This conclusion appears to have been reached by the authors on the basis that “*most professional services firms preferring to locate closer to the CBD*”. This is considered to represent a somewhat narrow interpretation of the market evidence, focussing on one segment of the wider office market, and fails to recognise the inherent strengths of Titanic Quarter’s location in commercial market terms. These strengths are set out in more detail within section 7.

Addressing Gaps in the Evidence Base

- 6.6 These gaps and deficiencies are considered below with reference to updated market evidence prepared by CBRE.

Market Overview

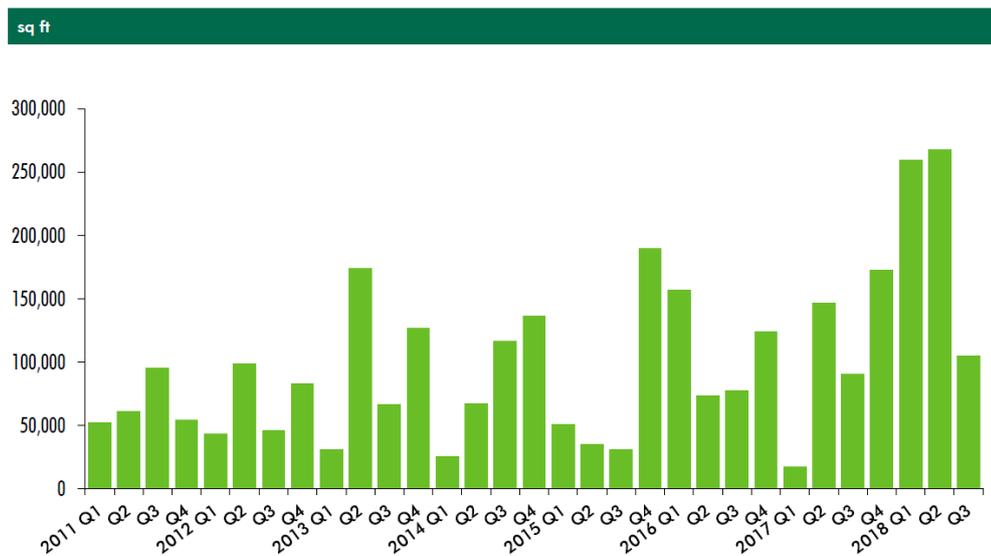
- 6.7 CBRE report that the office market in Belfast remains buoyant with record take-up of 643,983 sq ft in 63 separate transactions reflecting the strong take up reported in the Council’s own evidence base. Given that the five-year rolling average is 385,000 sq ft, this represents above trend take up and exceeds the rolling average by a considerable margin.

6.8 Whilst the uncertainty in the market over the last 24 months still remains, with Brexit and the non-functioning Stormont Executive, it is extremely positive to note a record set of take-up figures. CBRE expect the remainder of the year to be particularly active given the number of requirements in the market. They estimate that 2018 take-up could exceed 800,000 sq ft which in turn will push the rolling average in excess of 450,000 sq ft per annum.

6.9 Analysing the quarterly take-up, it is interesting to note that Q2 mirrored Q1 with take-up of 268,336 sq ft versus 270,310 sq ft in Q2. Whilst Q3 saw a lower level of take-up, 105,337 sq ft, there are a large number of deals currently in legals which should boost take-up further by the end of Q4. Notable deals completed in Q2 include:

- the Northern Ireland Civil Service at 9 Lanyon taking 150,000 sq ft,
- Unosquare taking 11,000 sq ft at May Chambers; and
- Atos taking 9,500 sq ft at Metropolitan Building.

Figure 6.1: Belfast Quarterly Office Take-up, 2011 - Q3 2018



Source: CBRE, October 2018

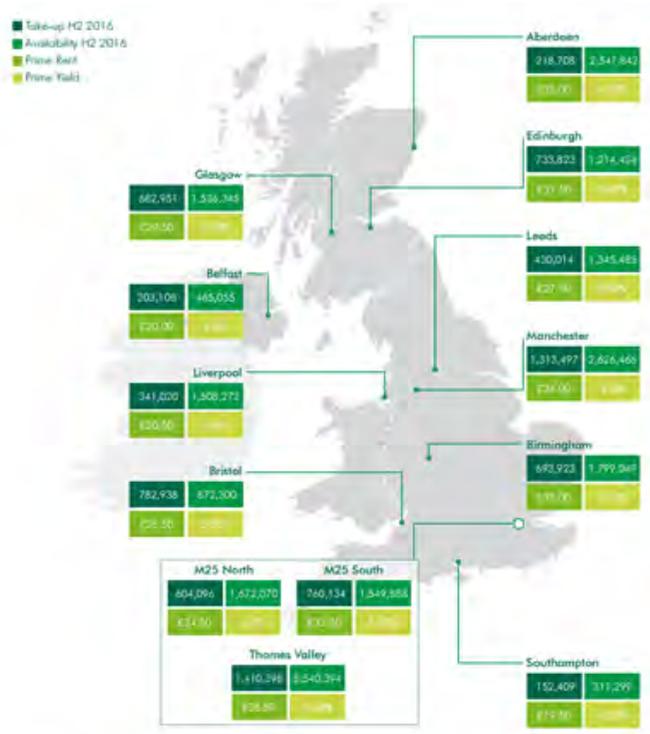
Figure 6.2: Belfast Office Market Annual Take Up 2011 to Q3 2018



Source: CBRE, October 2018

- 6.10 From an occupational point of view Brexit has had minimal impact so far. Current occupier requirements suggest latent demand for over 700,000 sq ft of office floorspace from the private sector, 300,000 to 600,000 sq ft from the public sector. CBRE are also aware of 300,000 sq ft of potential future requirements.
- 6.11 As a result there is currently very limited Grade A city centre availability which is fragmented across a number of buildings. There is approximately 230,000 sq ft of Grade A accommodation currently available. Headline city centre Grade A rents are currently £21.00 per sq ft but there have been transactions completed above this rate at £21.50 per sq ft for new build Grade A. Prime Yields for city centre Grade A space currently reflect 6.00%.
- 6.12 CBRE expect rents to increase during 2018, although the pace of growth is anticipated to be steady. Belfast is therefore expected to remain a comparatively affordable option for occupiers, with rent significantly lower than those witnessed in other regional centres as highlighted in Figure 6.3 overleaf.

Figure 6.3: UK Prime Office Rents



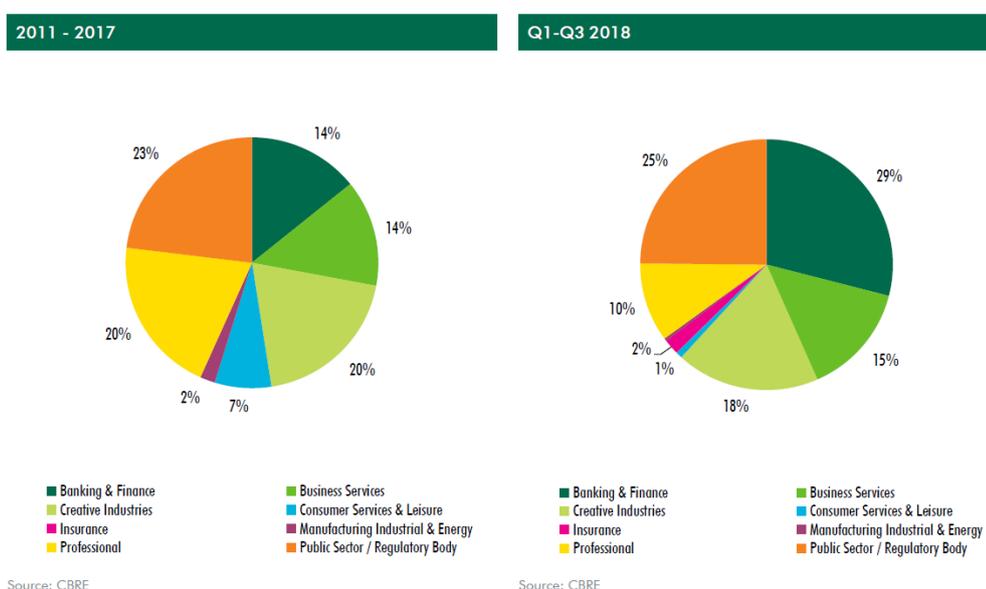
Source: CBRE Research, Q4 2016

PRIME OFFICE RENTS (Q4) 2016	
	€ per sq ft
Dublin	53.27
Aberdeen	32.00
Belfast	20.00
Birmingham	32.00
Bristol	28.50
Cardiff	25.00
Edinburgh	31.50
Glasgow	29.50
Leeds	27.50
Liverpool	20.50
London – City	70.00
London – West End	112.50
Manchester	34.00
South East	38.50
Southampton	19.50

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Demand

- 6.13 Figure 6.4 addresses an important gap in the Council’s evidence by illustrating the broad spread of take up by sector. In the past the Belfast market was dominated by the Public Sector which would have reflected approximately 50% of annual take up. This figure has diminished over the last 5-10 years.
- 6.14 In 2018 to date the largest take up by sector has been largely split between occupiers in the Banking and Finance, Public Sector, Professional, Creative and General Business sectors.
- 6.15 As shown in figure 6.4 below, the market is not reliant on any one sector which helps make the Belfast office market more resilient. Consequently, there is a need to ensure there is an adequate choice of sites and locations to meet the broad spectrum of need.
- 6.16 Take up by Sector



Source: CBRE, October 2018

- 6.17 Notable transactions in the first half of 2018 have undoubtedly been the deals to Allstate and Concentrix, located in the City Centre, and the Northern Ireland Civil Service which have accounted for approximately half of the total take-up. There have been other notable deals to Atos, Davidson McDonnell, Aecom and Seopa.
- 6.18 There have also been a number of major FDI announcements from Invest NI on behalf of companies such as SmashFly (70 jobs), Fintru (600 jobs for Belfast and Londonderry) located at the Gas Works on the edge of city centre, Novosco (150 jobs) located at Catalyst Inc within Titanic Quarter, Slice (50 jobs) located at Shaftsbury Square on the edge of city centre and Bamboo Rose (75 jobs) to name a small few.
- 6.19 It is important to note that these companies have been attracted to various locations across Belfast including the traditional CBD as well as waterfront developments at City Quays and Titanic Quarter. Catalyst Inc (formerly known as NI Science Park) has also

been successful in attracting companies that fall within the use classes permitted in Science Parks. Occupiers in Catalyst Inc. include, Queens University, Ulster University, Novosco, Citi, Microsoft and IBM.

Occupier Location Preferences

- 6.20 Established and growth sectors occupying office floorspace in Belfast include:
- **Financial and Professional Services:** Over 30,000 people are employed in this sector by globally recognised brands such as Citi, Allstate, Mercer, Baker McKenzie, Allen & Overy and Fujitsu. It is interesting to note that a large range of these occupiers have chosen not to locate within the traditional CBD. Allen & Overy, Baker McKenzie and TP ICAP all have located outside of the traditional core at City Quays and Laganside due to the availability of appropriately sized floorspace when they were looking to invest in the city. Citigroup have located to Titanic Quarter. Allstate and Concentrix have recently relocated and opened new Headquarters Buildings at Mays Meadows.
 - **Life and Health Sciences:** Belfast's universities play a leading role in creating spinouts and pioneering research and strong R&D engineering expertise have supported the sector's growth. Catalyst Inc. at Titanic Quarter offers office accommodation for Life and Health Science Companies.
 - **Technology:** Home to global businesses in financial software, data analytics and encryption, access control systems, and intelligent surveillance technologies. This sector employs over 1,200 people. Campus style environments such as Belfast Gasworks and Weavers Business Park are home to a number of Technology based companies to include Fintru, Proofpoint and Neueda. Again these are considered non CBD core locations.
 - **Creative and Digital:** Home to over 1,600 companies employing 20,000 people. Strong creative and digital sectors have supported this sector's growth.
- 6.21 These varied locations highlight that the market must offer choice not only on the type and size of building but also a wide range of locations. Equally, for Belfast to compete with other UK, Irish and EU cities for investment, the city needs to be able to provide choice, choice in location, choice in floor plate size, choice in building style and choice in the level of specification.
- 6.22 Based on transactions over the past few years CBRE perceive there to be latent demand for larger floor plates of up to 20,000 sq ft that are capable of being sub-divided to provide office suites of c. 10,000 sq ft,. This can be evidenced with reference to live requirements in the market, as summarised in Table 6.2 overleaf.

Table 6.2: Live Occupier Requirements

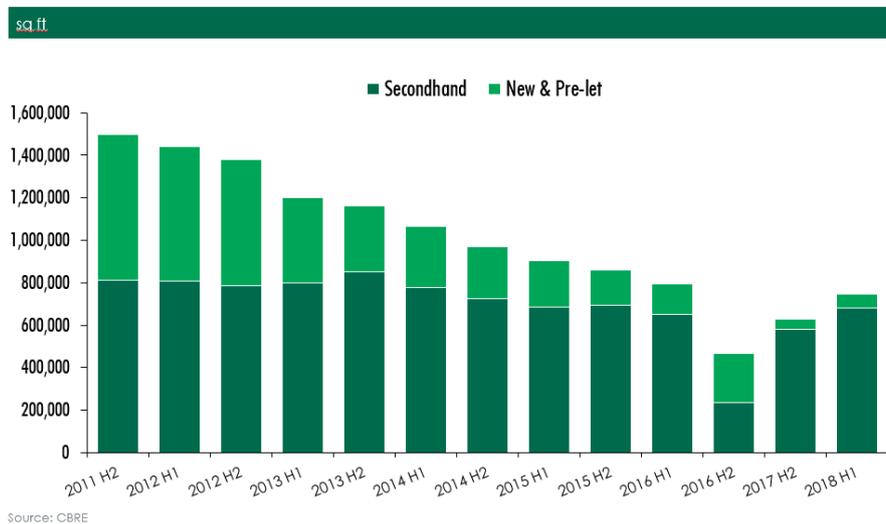
Sector	Size of requirement (Sq ft)	Location
Professional Services	150,000 – 175,000	Belfast
Financial Services	100,000	Belfast
Financial Services	70,000 – 100,000	Belfast
Technology	55,000 – 65,000	Belfast
Technology	30,000 – 35,000	Belfast
Housing Association	25,000 – 35,000	Belfast
Professional Services	20,000 – 30,000	Belfast
Financial Services	20,000 – 30,000	Belfast
Financial Services	20,000 – 30,000	Belfast
Professional Services	20,000 – 30,000	Belfast
Technology	20,000 – 30,000	Belfast
Professional Services	20,000 – 25,000	Belfast
Media	18,000 – 20,000	Belfast
Serviced Office Provider	15,000 – 25,000	Belfast

Source: CBRE, October 2018

Supply

- 6.23 The CBRE supply schedule of available accommodation at Appendix 1 highlights that 258,253 sq ft of office accommodation remains available in Belfast City of which 225,942 sq ft is considered Grade A or refurbished to a Grade A standard.
- 6.24 It is notable, however, that quality Grade A supply remains fragmented across a number of buildings and this supply will continue to decrease until new schemes become available.
- 6.25 Additionally, the supply schedule highlights that only City Quays 2 and Lesley Tower can currently offer floorplates in excess of 10,000 sq ft, with only 22,776 sq ft at City Quays and 10,166 sq ft at Lesley Tower remaining. This can be contrasted with the schedule of live requirements where a significant number of requirements in excess of 15,000 sq ft remain unfulfilled.

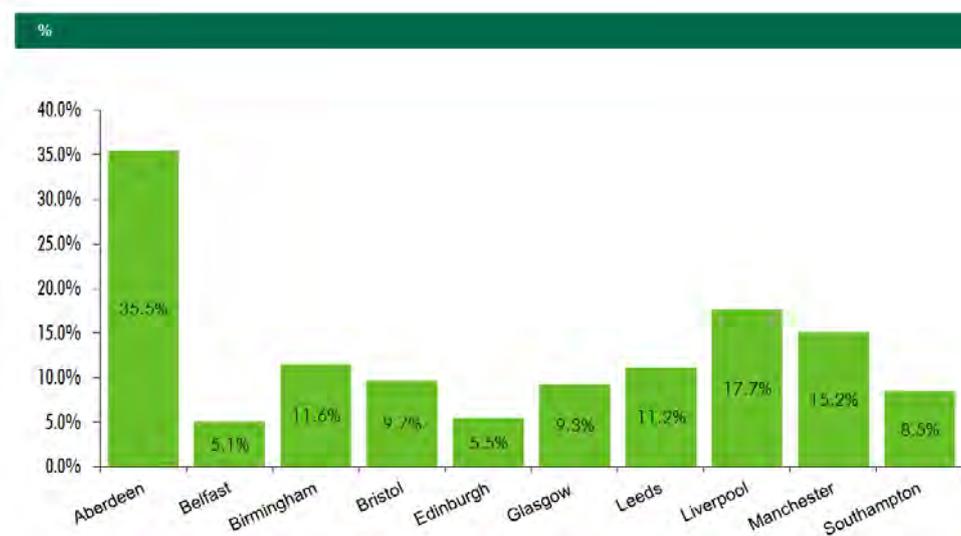
Figure 6.4: Belfast Office Market Availability 2011- H1 2018



Source: CBRE, October 2018

- 6.26 Whilst the Council has made reference to levels of vacancy of existing stock that it considers to be significant in justifying the approach it adopts to constraining supply Figure 6.5 confirms that the recent five year average of 5.1% has historically been one of the lower office vacancy rates when compared to other UK regional locations.

Figure 6.5: UK Office Market Vacancy Rates 2012 – Q1 2017



Source: CBRE, October 2018

- 6.27 Currently within the Belfast market the vacancy rate is sub 5%, further highlighting the lack of quality Grade A supply. Where new supply comes forward this is usually triggered by a pre-let, in turn reducing the amount of new supply available for immediate occupation once constructed to create headroom within the supply.
- 6.28 In terms of the significant occupier requirements listed above only the top 4 listed requirements ranked by size are likely to commit to pre-lettings. The others will be seeking accommodation either already available or nearing completion. This factor alone will continue to put pressure on supply as most developers cannot commence development speculatively.
- 6.29 While other buildings such as River House, Chichester House and Merchant Square could provide additional supply in 2019 it should be noted that market rumour would suggest a significant proportion of these new refurbished buildings are already under offer.

Table 6.3: Projects anticipated to complete during 2019

Building	Size (Sq Ft)	Quality	Comment
River House	82,800	Good Quality Refurbishment Grade A Equivalent	Delivery end of 2018 16 % currently pre-let & 34 % occupied by serviced office provider
Chichester House	46,000	Good Quality Refurbishment Grade A Equivalent	Delivery September 2019
Merchant Square	212,547	Good Quality Refurbishment Grade A Equivalent	Delivery September 2019 Rumoured to have tenant interest for 70% of space
Erskine House	100,000	New Build Grade A	All pre-let to HMRC

Source: CBRE, October 2018

- 6.30 As highlighted in section 5, there are a significant number of planning permissions within the pipeline but unfortunately this is no guarantee that a building will be delivered; the lack of development activity on certain sites providing evidence of this.
- 6.31 Until new floorspace is delivered the market will therefore continue to rely on refurbished buildings to provide the quality stock demanded by occupiers. Schemes of this nature which have been released to the market include, Linen Loft, Lincoln Building, Weaving Works, Flax House and Longbridge House. The next major scheme nearing completion is River House on High Street (80,000 sq ft), followed by Chichester House on Chichester Street (46,000 sq ft). Contractors are also on site for Merchant Square on Wellington Place; this will provide a 212,000-square foot scheme which is scheduled for completion in 2019.
- 6.32 River House (80,000 sq ft) prior to practical completion already has 50% of the space pre let and market rumour would suggest a major occupier is considering Merchant Square. As a consequence, two of the three buildings moving towards Practical Completion in 2019 already have space allocated to occupiers.
- 6.33 There are no further new build Grade A or refurbished schemes scheduled for delivery offering in excess of 50,000 sqft during 2019. In addition Belfast is suffering lack of supply of larger floorspace accommodation (in excess of 10,000 sq.ft).
- 6.34 CBRE are aware of a number of number of indigenous local office occupiers who, despite having a need for new premises, have not relocated to new accommodation in Belfast due to a lack of suitable supply. These occupiers have instead remained in situ and renewed existing leases and refurbished existing accommodation. This clearly represents a suboptimal solution for those businesses looking to grow and expand.

Summary and Policy Implications

- 6.35 Whilst the Council's evidence confirms a high need and demand for office floorspace it does not look at the market in a sufficiently robust way to fully appreciate what it needs. As a result, the varying needs of different business sectors are not adequately captured in the evidence base or LDP policies as currently drafted.
- 6.36 Based on the evidence presented within this section, a key concern is that the draft LDP fails to respond to the market evidence to support growth of key business sectors likely to occupy office space over the plan period. Policy EC3 is intended to enable Belfast to compete for investment in new employment sectors, and to provide opportunities for Belfast-based companies to expand through the provision of high-quality sites across the Council area. However, it is not clear how this will be achieved given the restrictions placed on office development within MEL, and at Titanic Quarter more specifically, through the implementation of Policy EC6.
- 6.37 As the CBRE analysis shows, the Belfast office market is not reliant on any one sector. In recent years FDI has also been attracted to various locations across Belfast. Whilst this has included the traditional CBD investment has also been seen in waterfront developments at City Quays and Titanic Quarter.
- 6.38 It is considered, therefore, that the case for limiting office floorspace provision at Titanic Quarter has not been proven by the Council's evidence. As currently drafted Policy EC6 will lead to an inadequate choice of office sites and locations to meet the broad spectrum of need over the plan period.
- 6.39 For Belfast to continue to compete with other UK, Irish and EU cities for investment, the city needs to be able to provide choice, choice in location, choice in floor plate size, choice in building style and choice in the level of specification.

7. The Titanic Quarter: a complementary offer

- 7.1 The complementary role and potential future contribution of the Titanic Quarter in office market terms is not currently recognised within the Draft Plan and Policies EC2, EC3 and EC6. This is despite Titanic Quarter representing a sustainable and accessible office location that has the potential to offer choice to the market which might not otherwise be achievable within the confines of the Council's defined City Centre boundary.
- 7.2 Draft BMAP (dBMAP) sets out a number of key site requirements for Titanic Quarter. This includes Policy OF 4, which outlines that B1(a) offices in the area should generally not exceed 15,000 sqm, but that proposals above and beyond this will be considered where it can be demonstrated that they cannot be accommodated within Belfast city centre and would otherwise result in a loss of inward investment⁷⁸.
- 7.3 It is evident that the current policy approach that was supportive of office development at Titanic Quarter has been matched with strong levels of occupier and developer interest. The 2018 Office Study notes that currently 11,200 sq m of B1(a) of general office floorspace has been built out at Titanic Quarter. Taking into account the planning approval for Olympic House which remains extant until August 2019, this creates an overall B1(a) floor space provision of 14,170 sq m, leaving 830 sq m permissible under key site requirements within dBMAP. Planning permission was also granted in 2014 for 26 no. business units to include 8 no. for Class B1(a) use (with a gross floor area of 4,800 sq m) and 18 no. for Class B1(c) use. This planning permission will be activated shortly.
- 7.4 Permission was also granted for a 50,000 sq m Financial Services Campus (FSC) as an exception to the 15,000 sq m threshold within the Titanic Quarter. When delivered the FSC will enable Northern Ireland to compete internationally with similar campus development, reinforcing stated policy and economic strategy measures which seek to drive economic growth and ensure new investment and job opportunities are secured.
- 7.5 Titanic Quarter has an important role to play in this regard via the provision of office floorspace that complements, rather than competes with new grade A floorspace either constructed, under construction or with planning permission in the city centre.
- 7.6 It is evident that office development at Titanic Quarter has been and will continue to be an important pre-requisite for sustaining the city's economic growth and responding to this well documented need by:
- Facilitating investment in critical business infrastructure in response to the identified need for more office floorspace in this location;
 - Supporting growth in sectors where Northern Ireland already has a competitive strength; including those with a propensity to occupy office floorspace outside the main office area / CBD outlined in section 6; and

⁷⁸ Department of the Environment (2014) Belfast Metropolitan Area Plan: Plan Strategy & Framework Volume 1, p. 62

- Elevating Northern Ireland as the location of choice for international investment and helping to secure the £5 billion in inward investment targeted in the Belfast Agenda over the next 10 years.

Accommodating Citigroup

- 7.7 When Citigroup began their search for a new Headquarter Building in Belfast deliverability and availability of accommodation was one of their key criteria. Simply put, had the Gateway Building at Titanic Quarter not been completed and available, the Citigroup investment would not have come to Northern Ireland. There were no other buildings either constructed or under construction at that time in Belfast which could have satisfied this tenant, in terms of location, size, floor plates and connectivity.

The complementary role of Titanic Quarter

- 7.8 The evidence presented within this report indicates that there remains a need for a choice of office accommodation and locations to attract inward investment and support the growth of a range of business sectors.
- 7.9 Titanic Quarter is already viewed by agents and occupiers as an important component of the City Centre office market. Importantly, CBRE report that occupiers do not typically draw distinctions between the City Centre and Titanic Quarter, with the market very much viewed as one of the same in location terms. However, what Titanic Quarter offers, that the City Centre does not, is greater flexibility in terms of flexible/larger floorplates, parking convenience and access to roads and airport infrastructure, which is often attractive to larger businesses looking to invest in Belfast.
- 7.10 Other factors which contribute to Titanic Quarter's appeal within this wider market include:
- **Functionality and specification of the product.** It is notable that Belfast City Centre typically offers office buildings with smaller floorplates and a lack of onsite car parking. Titanic Quarter is one of the few locations that can offer a City Centre location and flexibility in terms of floorplate size and can accommodate 20,000 sq ft plus floor plates by way of design and build options.
 - **Amenities** - The success of Titanic Quarter in commercial market terms has resulted in the area attracting a broad range of other onsite occupiers to include two hotels, leisure facilities; and retail accommodation at The Arc all providing a complimentary mix of uses and services. Titanic Belfast has also helped solidify the location as a key Belfast visitor destination.
 - **Connectivity** - Titanic Quarter benefits from excellent linkages, including direct access to main trunk roads and motorway network; public transport accessibility and airport access - George Best Belfast City Airport is within five minutes' drive whilst Belfast International Airport is thirty minutes' drive. Titanic Quarter is also only fifteen minutes' walk from Belfast City Hall. It also benefits from access to a train halt (10-15min walk). The new Belfast Rapid Transit (i.e. glider) will also provide a dedicate route (G2) to/from the city centre.

- **IT Infrastructure** - Titanic Quarter benefits and has developed one of the UK and Europe's most advanced, secure and connected telecommunications hubs. It is one of Europe's first developments to deliver an Open Access Carrier Neutral Network with fibre direct to every occupant. Titanic Quarter also enjoys access to Europe's fastest direct fibre-optic links to North America. 1 in 10 of all Global Foreign Transactions are routed through the Citi Building at Titanic.
- **Potential for Clustering** - Citigroup has provided the primer for other similar users to locate in Titanic Quarter. The FSC is also based on a clustering of financial services organisations on a dedicated site.

Case Studies

- 7.11 CBRE have considered comparator areas where a complementary offer has been achieved adjacent or in close proximity to established city centre markets.
- 7.12 Two examples have been chosen as precedents, including:
- Salford Quays / Media City in Greater Manchester; and
 - Dublin Docklands.
- 7.13 These schemes demonstrate the need for choice in any office market. These examples are located outside of the established office cores and are recognised in Policy terms as providing important opportunities to add a vibrancy to these cities. Indeed in both instances it is apparent that they have helped to stimulate investment and elevate office take-up as part of strongly performing City Centre markets, reflecting the complementary offer and different environment that they provide.

Media City, Manchester

- 7.14 Media City is located at Salford Quays in the suburbs of Manchester on the banks of the Manchester Ship Canal. The area has been transformed into a vibrant and sustainable destination to work with likes of BBC, ITV, Ericsson, dock10 and Kellogg's choosing to locate there. This has made the scheme known as an international hub for technology, innovation and creativity.
- 7.15 The regeneration process of Salford Quays has resulted in approximately 3,500 residents and 900 businesses supporting over 26,000 jobs which is approximately 23,000 more jobs than were lost in 1982 whenever Manchester Docks closed.
- 7.16 The first phase of Media City is valued at £650 million and planning has been secured for phase two which will see another £1 billion invested. This will facilitate the development of 10 office, housing and studio blocks and will ultimately double the size of Media City.



7.17 Media City provides a unique offering to complement the Manchester City Centre office market, distinguished by:

- A high quality environment that provides leisure, cultural, business opportunities;
- Access to an on-site talent pool from the University of Salford and University Technical College;
- An advanced infrastructure, offering future proofed secure connectivity;
- A mix of office space to meet a broad range of requirements, including revolutionary digital testing labs as well as meeting and event spaces.
- The provision of purpose built facilities which provide space for SMEs and micro businesses to work alongside larger companies to do business, develop, and test digital innovation
- A private wire network allowing for bespoke power solutions
- Its status as a BREEAM Sustainable Community.

7.18 Adopted and emerging policy in Manchester recognises the benefits brought by office development situated outside of the City Centre which broadens its commercial offer. 'Policy EC 3: The Regional Centre' of Manchester City Council's adopted Core Strategy (CS)⁷⁹ states that "*within the Regional Centre, development for employment generating uses including offices and other commercial development will be encouraged*"⁸⁰, outlining that the area constitutes the largest concentration of economic activity in the

⁷⁹ Manchester City Council (2012) Manchester's Local Development Framework Core Strategy Development Plan Document, pp. 41-42

⁸⁰ *Ibid.*

Manchester City Region and therefore the key means of growing the city's productivity rates.

- 7.19 The CS affirms that the Regional Centre is defined as not only Manchester, but also parts of the neighbouring authorities of Salford and Trafford, stating that *“creating an effective area within which an agglomeration economy can grow is a key step”*⁸¹.
- 7.20 Whilst the adopted CS states that the City Centre will remain the focus for office development, it is recognised that *“it is essential that sites beyond the City Centre are identified to accommodate growth. Furthermore, not all office development will be suited to a City Centre location”*⁸². The importance of nearby Media City to Manchester (referred to by the CS as Salford Quays) is therefore explicitly acknowledged in terms of supporting the diversity of the city's office market and providing employment and skills opportunities for residents of Manchester. The CS's 'Policy EC 8: Central Manchester'⁸³ refers to Salford Quays as one of the key employment opportunity sites which, although located outside central Manchester, will serve to better connect the city's residents, particularly young people, to the job opportunities presented by the Regional Centre's growth sectors.
- 7.21 Similarly, 'Policy GM3: Offices' of the Draft Greater Manchester Spatial Framework (GMSF)⁸⁴, the Greater Manchester Combined Authority's (GMCA) draft joint development plan document, identifies The Quays, and the nationally significant Media City, as a *“distinctive office location”* which should be *“significantly”* expanded. The Policy's Reasoned Justification further states that *“The City Centre is complemented by the distinctive and high profile locations of The Quays and Manchester Airport, which already have established high quality office markets with capacity for significant growth”*⁸⁵.
- 7.22 According to research undertaken by the Manchester Office Agents Forum (MOAF)⁸⁶, of which CBRE is a member, both City Centre and out of town office markets witnessed strong levels of take up during 2018.
- 7.23 The latest research shows that office take-up in Manchester City Centre reached 327,035 sq ft in Q2 2018, taking the total for the first half of the year to 769,118 sq ft. Both figures are significantly higher than the same periods in 2017, when take up totalled 282,604 sq ft in Q2 and 486,915 sq ft in H1⁸⁷.

⁸¹ *Ibid.*

⁸² *Ibid.*

⁸³ *Ibid.* pp. 76-77

⁸⁴ Greater Manchester Combined Authority (2016) Draft Greater Manchester Spatial Framework, p. 49

⁸⁵ *Ibid.*

⁸⁶ Founded in 2009, MOAF members include Avison Young, BE Group, CBRE, Colliers International, Canning O'Neill, Cushman & Wakefield, Edwards & Co, GVA, Hallams Property Consultants, JLL, Knight Frank, LSH, Matthews & Goodman, OBI Property, Savills, Sixteen Real Estate and TSG Property Consultants.

⁸⁷ <https://www.insidermedia.com/insider/northwest/stellar-performance-for-manchester-office-take-up>

- 7.24 The research highlights that Manchester City Centre take up has continued robustly during 2018, with minimal displacement from out of town office market at Salford Quays and Old Trafford. Indeed, the research highlights that these areas have also witnessed a 30% increase in take up over the same period – complementing a growing city centre office market by offering the market a choice of products and locations, rather than directly competing with it.
- 7.25 MOAF also anticipate the strong take up in both City Centre and out of town office markets continuing into the second half of 2018.



Dublin Docklands

- 7.26 Dublin Docklands is a new urban quarter which has been created outside what was previously the considered the city core.
- 7.27 The Dublin City Development Plan 2016–2022 (DCDP)⁸⁸ designates the Docklands area as a Strategic Development and Regeneration Area (SDRA). Comprising 66ha of the wider Docklands SDRA area, North Lotts and Grand Canal Dock was previously adopted by Dublin City Council (DCC) as a Strategic Development Zone (SDZ) in 2014, with the SDZ plan document making provision for 366,000 sqm of commercial development, supporting up to 23,000 new jobs⁸⁹.
- 7.28 Whilst the city centre remains the priority for employment, the DCDP affirms that this is “*complemented*”⁹⁰ by Docklands, which serves the purpose of expanding the city centre eastwards, providing space for new employment clusters and linking them to the city core. The DCDP acknowledges the area’s potential to contribute to the city’s global competitiveness, stating that “*Dublin needs to develop a sufficient critical mass to compete at an international level*”⁹¹, and that “*the Docklands area has the potential to fulfil this strategic role as a global economic hub*”⁹². Docklands has proven successful as a centre of ICT, innovation and finance, with Dublin City Council seeking to consolidate and expand these strengths through the development of five hubs located within the SDZ area⁹³.



- 7.29 From a commercial market perspective, Dublin Docklands is considered as part of the prime Dublin Office core when major occupiers are considering locating within Dublin City Centre. This is in evidence in rental values, with Dublin prime office rents currently ranging from 55-65 euros per sq ft with Dublin Docklands trading at similar levels of between 55-60 euros per sq ft.

⁸⁸ Dublin City Council (2016) Dublin City Development Plan 2016–2022

⁸⁹ *Ibid.* p. 271

⁹⁰ *Ibid.* p. 26

⁹¹ *Ibid.* p.269

⁹² *Ibid.*

⁹³ *Ibid.* p. 271

- 7.30 The planning strategy for the Docklands is one based on the provision of a range of employment uses to promote for the full range of international, national, and local enterprise. Although the area is undoubtedly considered as a prime office location it complements the traditional core through the provision of a range of employment uses from large-scale FDI types, to small local support services, including start-up units. There is also a variety of tenures available – long-term, short-term and temporary, to contribute to the economic vitality of the SDZ area and its surroundings.
- 7.31 The variety of sites available, proximity to the City Centre, the unique waterfront setting, and the potential for collaboration with employers in the area also add to the areas appeal and complementarity. There is also already evidence of a clustering of technology companies in the area, with Facebook, Google and Indeed.com all taking space in the area in recent years.
- 7.32 As shown in the chart below, the Docklands has made a positive impact on the Dublin office market acting as a stimulus for investment and elevating office take up in Dublin’s prime 2/4 sub market area over the past 4 years. It is evident that whilst the Docklands has accounted for a proportion of office take up, take up levels in areas outside of the Docklands area have generally been higher.

Figure 7.1: Take up in the Dublin 2/4 Sub Market Area



Source CBRE, November 2018

- 7.33 CBRE report⁹⁴ that in overall terms the city centre (including Docklands) accounted for 62% (or 35,320 sq m) of office take-up in Dublin in Q3 2018 and 74% of lettings in the capital in the first three quarters of the year. A total of 37 of the 51 individual lettings signed in Dublin city centre during Q3 occurred in the Dublin 2/4 sub market area. This prime district accounted for 80% of city centre take-up in Dublin during the first three quarters of 2018 and highlights the success of the Policy approach in allowing the complementary growth of office floorspace at the Docklands as part of a wider city centre market.

⁹⁴ CBRE Ireland (2018) Dublin Office MarketView, Q3 2018

Summary and Policy implications

- 7.34 The evidence presented above and within section 6, show that demand for office floorspace extends beyond the red line boundary of the City Centre into the Harbour area and Titanic Quarter. Titanic Quarter is also viewed in commercial market terms as being an important component of this wider market geography.
- 7.35 Notwithstanding this, the complementary role and future contribution of the Titanic Quarter in commercial market terms is not currently recognised within the draft LDP, with Policies EC3 and EC6 largely ignoring the commercial potential of the area.
- 7.36 Based on the evidence presented above and throughout this report, there is considered to be strong justification for elevating Titanic Quarter's status within the draft LDP. Moreover, the draft LDP and policies therein need to recognise that Titanic Quarter:
- represents a 'growth of the city centre' with an offer that complements rather than competes with the city centre as the regional driver of economic growth.
 - has a pivotal role in attracting inward investment and creating significant employment with key growth sectors, including Financial Services.
 - offers the potential to provide greater flexibility in the supply of identified land within two related and adjacent locations, mitigating risks to delivery that might otherwise manifest over the plan period.
- 7.37 Without this recognition, there is a risk that the current policy approach will fall considerably short of its stated intention of providing an *"adequate supply of land on sites in a range of locations, sizes and conditions...to attract investment into the city and to support existing business sectors"*⁹⁵. This in turn creates a risk that the needs of larger occupiers in target growth sectors will not be met and investment lost to other areas.
- 7.38 As demonstrated above with the examples of Media City and Dublin Docklands, there are precedents from elsewhere which demonstrate that a complementary non-competing offer in an area representing an extension to the traditional City Centre can be critical to stimulating a strong market and attracting investment.

⁹⁵ Belfast City Council (2018) Belfast Local Development Plan Draft Strategy 2035, para 8.1.14

8. Conclusions and Proposed Modifications to the Draft LDP

8.1 The evidence presented within this report provides compelling evidence to justify an alternative, more flexible approach that would facilitate the provision of new floorspace at Titanic Quarter without undermining the role and function of the City Centre as the primary office location.

8.2 In summary:

- There is a significant need and demand for office floorspace in growing Belfast City, beyond that currently recognised in the draft Plan and its informing evidence base. It is therefore considered that the overall figure of 550,000sqm underestimates the employment space needed in Belfast to support future job growth and will limit the ability to respond to market changes or increased demand in Belfast.
- While this likely underestimation of the overall quantum of employment space needed in Belfast has direct implications for Policy EC2, it has wider consequences elsewhere in the draft LDP. The scale of the perceived '*oversupply*' justifying Policies EC3 and EC6 would inevitably diminish when compared with a higher overall need for employment space, or where it was acknowledged that this supply may not provide the type of space needed by growth sectors.
- The supply assessment on which policies are based is highly sensitive to the assumptions applied. Whilst the Council has taken a comparatively positive approach to identify employment floorspace capacity across the City Centre, it is considered that the available supply is overstated and likely to be the subject of a number of delivery constraints over the plan period potentially leading to a lack of choice in supply and location.
- The current approach masks important nuances in demand across different sectors and locations. For example, the draft LDP does not break down this need to different types of B uses, and as a result policies take no account of the different type of employment space that may be needed. This is a significant omission, which inherently but unjustifiably assumes that any type of B use employment space in Belfast would meet the needs of any type of business. Evidently, there is a clear risk that the LDP will not provide the type of employment space needed in Belfast to support job growth across different sectors.
- The current approach takes no account of the specific locational or site-specific needs of those occupying offices. The lack of detail on the type of office space needed means that it is not possible to appraise the extent to which supply could be developed to meet the needs of different types of businesses. It is notable, however, that the Belfast office market is not reliant on any one sector. FDI has also been attracted to various locations across Belfast including the traditional CBD as well as waterfront developments at City Quays and Titanic Quarter.

- For Belfast to continue to compete with other UK, Irish and EU cities for investment, the city needs to be able to provide choice, choice in location, choice in floor plate size, choice in building style and choice in the level of specification. Conversely a lack of choice in supply and location has the potential to undermine Belfast's role as the primary office location in Northern Ireland and could result in investment being lost to other areas.
- Demand for office floorspace extends beyond the red line boundary of the city centre towards the Waterfront. Titanic Quarter is also viewed in commercial market terms as being an important component of this wider market geography. Notwithstanding this, the complementary role and future contribution of the Titanic Quarter in commercial market terms is not currently recognised within the draft LDP, with Policies EC3 and EC6 largely ignoring the commercial potential of the area.
- The complementary role and future contribution of the Titanic Quarter in commercial market terms should be recognised within the draft LDP:
 - it represents a 'growth of the city centre' with an offer that complements rather than competes with the city centre as the regional driver of economic growth.
 - it has a pivotal role in attracting inward investment and creating significant employment with key growth sectors, including Financial Services.
 - It offers the potential to provide greater flexibility in the supply of identified land within two related and adjacent locations, mitigating risks to delivery that might otherwise manifest over the plan period.
- As demonstrated with the examples of Media City and Dublin Docklands, there are precedents from elsewhere which demonstrate that a complementary non-competing offer in an area representing an extension to the traditional City Centre can be critical to stimulating a strong market and attracting investment.
- Clustering headquarters offices has also proven to be a successful strategy for catalysing investment in globally competitive cities and Titanic Quarter presents a significant opportunity to replicate that success here in Belfast.

Tests of Soundness

8.3 Noting the contents of this report, we contend that the above-mentioned policies, in their current form fail the following tests of soundness:

- C1, C2, C4, CE2, CE4

Modification Sought

8.4 To ensure the soundness test can be met it is recommended that policies EC2, EC3 and EC6 of the Draft LDP are amended as follows:

- (a) EC2 and EC3 - Recognise Titanic Quarter as forming an important segment of the City Centre commercial office market that has potential to contribute to the supply and jobs growth over the Plan period;
- (b) EC2 and EC3 - Identify Titanic Quarter as a location of choice for offices; and
- (c) EC6 - Amend it in a manner that is commensurate with the above-mentioned modifications.

Appendix 1: Committed City Centre Schemes with Planning Permission

Development Name	Address	Size – Available Space (sq ft.)	Developer
Chichester House	21-27 Chichester Street	46,676	Kilmona Holdings
Merchant Square	Wellington Place	207,000	Oakland FRO
Royal Exchange	Royal Avenue/North-East Quarter (41-51)	103,766	Castelbrooke
Bedford Square and Ewarts Warehouse	Bedford Street	189,320	McAleer & Rushe
Olympic House	Titanic Quarter, Belfast	148,038	Titanic Quarter Ltd
City Quays Business Centre	Belfast Quay, Harbour Estate, Belfast	50,000	Belfast Harbour Commissioners
Waterside (formerly Sirocco)	Belfast Waterfront	250,000	Vanguard Real Estate
Paper Exchange	Chichester Street	200,000	Wirefox
5 Donegall Square South	5 Donegall Square South	80,000	Killultagh Estates Ltd
66a Great Victoria Street	66a Great Victoria Street	91,025	McAleer and Rushe
Chancery House	89 Chichester Street/88 Victoria Street, Belfast	40,000	Chancery House
48-50 Great Victoria Street	48-50 Great Victoria Street	43,700	Fisherwick Inns Ltd
One Bankmore Square	14 Dublin Road	255,000	Richland Group
North Yard Offices	Titanic Quarter	150,000	Titanic Quarter Limited
Lyndon Court	32-38 Queen Street	43,898	AD Enterprises (NI) Ltd
83-87 Castle Street	83-87 Castle Street	14,000	Fenton Partnership
G5	102-127 Grosvenor Road	200,000	Mr R Jebb
Financial Services Centre	Titanic Quarter	600,000	Titanic Quarter Limited

Alfred House	19-21 Alfred Street	5,650	Killultagh Estates
Brunswick House	5-7 Brunswick Street	49,500	Killultagh Estates
Centre House	69-87 Chichester Street	92,500	Kilmona Holdings
35-47 Donegall Place	35-47 Donegall Place	65,000	Bywater Properties Investment Management LLP
Graham House	1-5 Custom House Square	120,000	Stargieme
6-14 Chichester Street	6-14 Chichester Street	24,678	SS Moore
	Total	3,023,075 sq ft (285,187 sq m)	

Appendix 2: Planning Applications Submitted and Pending Approval

Development Name	Address	Size – Available Space (sq. ft.)	Developer
The Sixth	124-144 Royal Avenue	229,430	McAleer and Rushe
City Quays 3	Clarendon Road, City Quays	260,000	Belfast Harbour
Gas Works	Cromac Place	74,200	Inislyn Developments Ltd
Butcher Building	110-152 North Street	235,000	Bywater Properties
Clarence Gallery	28 Linenhall Street	70,000	Killultagh Estates Ltd
Norwich Union House	Fountain Street/Castle Street	100,000	McAleer and Rushe
May Street	29 May Street	60,000	Simpson
22 Cromac Place	22 Cromac Place, Gasworks	100,000	Cromac Quay Ltd
Clarence Chambers	18-20 Donegall Square East	16,500	MJM Pearl Ltd
Lanyon Central	45 East Bridge Street	230,000	Kilmona Holdings
Pierpoint Plaza	Queens Road, Titanic Quarter	118,000	Catalyst Inc.
Waterside (formerly Sirocco)	Belfast Waterfront	581,250	Vanguard Real Estate
	Total	2,074,380 sq ft (192,715 sq m)	

Appendix 3: Schedule of Available City Centre Grade A Space

Address	Postcode	Market Group	Floor	Floor Split (sq ft)	Total (sq ft)
River House 48 - 60 High Street Belfast	BT1 2BE	Belfast City Centre	12th	6,000	42,000
			11th	6,000	
			10th	6,000	
			9th	6,000	
			8th	6,000	
			7th	6,000	
			6th	6,000	
The Laser 2 Building Weavers Court Business Park Linfield Road Belfast	BT12 5GH	Belfast City Centre	3rd	8,043	34,077
			2nd	9,363	
			1st	9,363	
			Ground	7,308	
City Quays 2 Corporation Square Belfast	BT1 3BG	Belfast City Centre	2nd	11,388	26,199
			1st	11,388	
			Ground	3,423	
Artola House 91/97 Victoria Street Belfast	BT1 3GL	Belfast City Centre	4th	3,551	19,175
			3rd	3,906	
			2nd	3,906	
			1st	3,906	
			Ground	3,906	
Bedford House 16/22 Bedford Street Belfast	BT2 7FD	Belfast City Centre	8th	3,207	17,580
			7th	6,458	
			4th	5,565	
			2nd	2,350	
Moneda House 25/27 Wellington Place Belfast	BT1	Belfast City Centre	5th	3,326	16,758
			4th	3,358	
			3rd	3,358	
			2nd	3,358	
			1st	3,358	
Lesley Tower 42 Fountain Street Belfast	BT1 5EF	Belfast City Centre	Part 2nd	5,900	16,066
			3rd	10,166	
North Tower 31 Clarendon Road Belfast	BT1 3BG	Belfast City Centre	3rd	4,507	13,826
			2nd	4,648	
			1st	4,671	

Address	Postcode	Market Group	Floor	Floor Split (sq ft)	Total (sq ft)
Northern Court 16/18 Gloucester Street Belfast	BT1 4JB	Belfast City Centre	4th	2,884	13,785
			3rd	2,884	
			2nd	2,884	
			1st	2,884	
			Ground	2,249	
Capital House 1/3 Upper Queen Street Belfast	BT1 6PU	Belfast City Centre	6th: Suite 2	4,630	11,030
			6th: Suite 1	5,200	
			7th	1,200	
The Boat 49 Queen's Square Belfast	BT1 3FG	Belfast City Centre	4th	4,090	5,543
			2nd	1,453	
City Exchange 11/13 Gloucester Street Belfast	BT1 4JH	Belfast City Centre	6th	1,865	5,185
			2nd - Suite A	1,550	
			2nd - Suite B	1,770	
Weavers Court Business Park Linfield Road Belfast	BT12 5GH	Belfast City Centre	Unit 12	5,000	5,000
Millennium House 17/25 Great Victoria Street Belfast	BT2 7BN	Belfast City Centre	Ground	4,923	4,923
Law Society House 90/106 Victoria Street Belfast	BT1 3GN	Belfast City Centre	Part 2nd	4,387	4,387
Montgomery House 29/33 Montgomery Street Belfast	BT1 4NX	Belfast City Centre	7th	4,082	4,082
Lincoln Building 27/45 Great Victoria Street Belfast	BT2 7SL	Belfast City Centre	Part Ground	3,768	3,768
Lesley Studios 32/36 May Street	BT1 4NZ	Belfast City	1st	2,800	2,800

Address	Postcode	Market Group	Floor	Floor Split (sq ft)	Total (sq ft)
Belfast		Centre			
Imperial House 4/10 Donegall Square East Belfast	BT1 5HD	Belfast City Centre	Part 1st	2,625	2,625
Custom House Square Ulster Street Belfast	BT1 3EW	Belfast City Centre	Ground	2,238	2,238
Montgomery House 29/33 Montgomery Street Belfast	BT1 4NX	Belfast City Centre	Part 2nd	2,138	2,138
Harvester House 4 Adelaide Street Belfast	BT2 8GE	Belfast City Centre	Part 2nd	1,806	1,806
7 Exchange Place Cathedral Quarter Belfast	BT1 2NA	Belfast City Centre	2nd	1,359	1,359
Craig Plaza 51 Fountain Street Belfast	BT1 6GB	Belfast City Centre	4th	1,193	1,193
20 May Street Belfast	BT1 4NL	Belfast City Centre	Ground	765	765
State Buildings 16/22 Arthur Street Belfast	BT1 4GE	Belfast City Centre	Ground	215	215
				Total	258,523

Source: CBRE

Turley Office
1 New York Street
Manchester
M1 4HD



Belfast LDP 2035 - Plan Strategy

Overview

We're developing the new Local Development Plan (LDP) which is the land use plan for Belfast up to 2035. The Plan will guide investment and set out policies and proposals for the use, development and protection of land across the city. Once adopted the plan will be used to determine planning applications. It will take approximately four years to develop and formally adopt the new LDP.

A series of consultation stages are built into the process for creating the LDP and are defined by legislation to help local people input into this Plan. We are currently undertaking the second stage of the consultation process in relation to the draft Plan Strategy.

Your opinions matter to us and we want to hear from you during the various stages throughout the preparation of the plan. While you can provide feedback using this form, we encourage you to use our online questionnaire via the Council's Consultation Hub at: <https://yoursay.belfastcity.gov.uk/>. The consultation closes on 15th November 2018.

What is the LDP?

The LDP:

- Guides development
- Provides certainty and a framework for investment
- Facilitates sustainable growth
- Puts communities at the heart of the process
- Allows for speedier decision making under the new plan-led system

How will this impact on me?

Our LDP will have an impact on everyone who lives, works and visits Belfast because it will shape how the city will develop in the future. Your views are important so we'd like you to get involved in its preparation.

What is the Plan Strategy?

The Plan Strategy will be a strategic policy framework for the plan area as a whole across a range of topics. It will set out an ambitious but realistic vision for Belfast as well as the objectives and strategic policies required to deliver that vision. Establishing this strategic direction early in the plan process will provide a level of certainty on which to base key development decisions in the area as

well as the necessary framework for the preparation of the Local Policies Plan. You can find out more about the Plan Strategy, and access all relevant documents, on the Council's website at:

www.belfastcity.gov.uk/LDP.

Accessibility

The relevant documents are available, on request, in alternative formats - Braille, audio, large print, easy read. The council will also consider requests to produce it in other languages. If you require the documents in these or other formats please contact us:

Belfast Planning Service
Belfast City Council Cecil
Ward Building
4-10 Linenhall Street Belfast
BT2 8BP

Telephone: 028 9050 0510

Email: [**localdevelopmentplan@belfastcity.gov.uk**](mailto:localdevelopmentplan@belfastcity.gov.uk)

A. Data Protection

Belfast City Council is the Data Controller under the General Data Protection Regulation (GDPR) for the personal data it gathers for the purposes of sending regular email updates on the Local Development Plan from Belfast Planning Service.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the independent examination process.

The council accepts that you are providing your personal data on the basis of consent and are positively agreeing for the council to hold and further use it, publish it (without personal information such as name and email, but will include organisation). Belfast City Council must also share it with the Department for Infrastructure and whoever they appoint to undertake the independent examination.

Any personal details that you provide the Council will be handled in accordance with the GDPR and Data Protection Act 2018. As such we will only use your data for the purposes that you have given this information for and will only be shared where necessary to provide the service that you are contacting us about. If you would like further information in regards please see the website belfastcity.gov.uk/about/privacy

The personal data is held and stored by the council in a safe and secure manner and in compliance with Data Protection legislation and in line with the council's Records Retention and Disposal Schedule.

If you wish to contact the council's Data Protection Officer, please write to:

Belfast City Council,
City Hall Belfast,
BT1 5GS

or send an email to records@belfastcity.gov.uk

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

(Required)



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?

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Even if you opt for your comments to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the inspectorate they appoint to oversee the examination in public into the soundness of our plan. This will be done in accordance with the privacy statement above.

(Required)

Please select only one item



Yes, with my name and/or organisation



Yes, but without my identifying information

B. 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?

(Required)

Please select only one item

- Individual *(Fill in the remaining questions in this Section, then proceed to Section C)*
- Organisation *(Fill in the remaining questions in this Section, then proceed to Section D)*
- I'm an Agent *(Fill in the remaining questions in this Section, then proceed to Section E)*

Q4. What is your name?

Title

Mr

First Name (Required)

Brian

Last Name (Required)

Kelly

Q5. What is your telephone number?

Telephone number

██████████

Q6. What is your email address?

████████████████████

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

(Required)

Please select only one item

- Yes No Unsure

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

Not Available

C. Individuals

If you are responding as an individual, please complete this Section, then proceed to Section E

Q8. What is your address?

Address Line 1 (Required)

Line 2

Line 3

City (Required)

Postcode (Required)

D. Organisation

If you have selected that you are responding as an organisational respondent, there are a number of pieces of information that we are legally required to gather from you.

Q9. If you are responding as a representative of a group or organisation, please complete this Section, then proceed to Section E.

Organisation (Required)

Your Job Title (Required)

Organisation address (if different from above):

Address Line 1 (Required)

Line 2

Line 3

City

Postcode (Required)

E. Agents

If you have selected that you are responding as an agent on behalf of other people/organisations, there are a number of pieces of information that we are legally required to gather from you.

Q10. Please provide details of the organisation or individual you are representing: The name of the organisation or individual you are representing: (Required)

Titanic Quarter Limited and Belfast Harbour Commissioners

Client contact details:

Client

Titanic Quarter Limited

Title

Mr

First Name (Required)

James

Last Name (Required)

Eyre

Address Line 1 (Required)

Titanic House

Line 2

Queen's Road

City

Belfast

Postcode (Required)

BT3 9DT

Telephone number (Required)

██████████

Email address (Required)

████████████████████

Client

Belfast Harbour Commissioners

Title

Mr

First Name (Required)

Graeme

Last Name (Required)

Johnston

Address Line 1 (Required)

Harbour Office

Line 2

Corporation Square

City

Belfast

Postcode (Required)

BT1 3AL

Telephone number (Required)

██████████

Email address (Required)

████████████████████

Q11. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

(Required)

Please select only one item

Agent Client Both

F. 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?

(Required)

Please select only one item

I believe it to be sound (*Proceed to Section G*)

I believe it to be unsound (*Proceed to Section H*)

G. Sound

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

(Required)

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

H. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Vision, Aims and Objectives

Policy (if relevant)

Q15. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6, available at:

<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

- P4 - Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- C1 - Did the council take account of the Regional Development Strategy?
- C2 – Did the council take account of its Community Plan?
- C3 - Did the council take account of policy and guidance issued by the Department?
- C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
- CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils
- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Q16. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please refer to Section 5 – Vision, Aims and Objectives of our representation and the relevant accompanying appendices.

Q17. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Please refer to Section 5 – Vision, Aims and Objectives of our representation and the relevant accompanying appendices.

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

I. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Spatial Development Strategy

Policy (if relevant)

SD2, SD3

Q15. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6, available at:

<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?

- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 - Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- C1 - Did the council take account of the Regional Development Strategy?
- C2 – Did the council take account of its Community Plan?
- C3 - Did the council take account of policy and guidance issued by the Department?
- C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
- CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils
- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Q16. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please refer to Section 6 – Spatial Development Strategy of our representation and the relevant accompanying appendices.

Q17. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Please refer to Section 6 – Spatial Development Strategy of our representation and the relevant accompanying appendices.

J. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Shaping a Living Place

Policy (if relevant)

HOU4, HOU5, HOU6 and DES3

Q15. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6, available at:

<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

- P4 - Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- C1 - Did the council take account of the Regional Development Strategy?
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- C3 - Did the council take account of policy and guidance issued by the Department?
- C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
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- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Q16. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please refer to Section 7 – Shaping a Living Place of our representation and the relevant accompanying appendices.

Q17. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Please refer to Section 7 – Shaping a Living Place of our representation and the relevant accompanying appendices.

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

K. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Creating a Vibrant Economy

Policy (if relevant)

EC2, EC3, EC6, CC1

Q15. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6, available at:

<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

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- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Q16. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please refer to Section 8 – Creating a Vibrant Economy of our representation and the relevant accompanying appendices.

Q17. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Please refer to Section 8 – Creating a Vibrant Economy of our representation and the relevant accompanying appendices.

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

L. Unsound

Here we will be asking you to specify which part of the draft Plan Strategy you believe to be unsound and why.

Note: If you wish to notify us of more than one part of the plan that you consider to be unsound, each part should be listed separately. Complete this page in relation to one part of the plan only. You will then be able to make further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Q14. To which part of the Plan Strategy does your representation relate?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

Relevant Section or Paragraph

Building a Smart Connected & Resilient Place

Policy (if relevant)

TRAN8, TRAN9

Q15. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6, available at:

<https://www.planningni.gov.uk/index/advice/practice-notes/common-newpage-9.htm>

You can select more than one reason you believe this part of the draft Plan Strategy to be unsound. However, the soundness test(s) you select here should only relate to the relevant section, paragraph or policy identified above.

If you wish to notify us of more than one part of the plan that you consider to be unsound you can choose to submit further responses to other parts of the plan by completing and submitting a copy of Section H for each part you choose to identify.

(Required)

Please select all that apply

- P1 - Has the development plan document (DPD) been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?
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- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
- CE3 - There are clear mechanisms for implementation and monitoring
- CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Q16. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please refer to Section 9 – Building a Smart Connected & Resilient Place of our representation and the relevant accompanying appendices.

Q17. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Please refer to Section 9 – Building a Smart Connected & Resilient Place of our representation and the relevant accompanying appendices.

Note: If you wish to attach any evidence to support your comments above, please enclose your document(s) with this form. However, if you wish to refer to specific sections within a separate report, this is best included within the above text box.

M. Type of Procedure

Q19. Please indicate if you would like your representation to be dealt with by:
(Required)

Please select only one item

- Written representations (Choose this procedure to have your representation considered in written form only.)
- Oral hearing (Choose this procedure to present your representation orally at the public hearing event(s))

Unless you specifically request a hearing, an independent examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note however that an independent examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.