

ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030

Draft Plan Strategy Response

Belfast International Airport

September 2019



Contents

1.0	Introduction	2
2.0	Draft Plan Strategy	4
3.0	Conclusions	10

Annexes

Annex 1 – Airport Operational Area Drawing

Annex 2 – BIA Appropriate Uses

1.0 Introduction

- 1.1 We write to the Council on behalf of Belfast International Airport in respect of the recently published Draft Plan Strategy (DPS) and as part of the wider Local Development Plan 2030 process. This representation follows on from the initial representation submitted to the Council in August 2016, and the Preferred Options Paper representation submitted in April 2017. As the Council will be aware, the Local Development Plan process is of critical importance to BIA in order to ensure the future growth and expansion of the Airport can be fully accommodated and delivered in the most sustainable and efficient manner during the new Plan period.
- 1.2 The Regional Development Strategy (RDS) 2035 designates BIA as being a Regional Gateway and states that gateways are strategically important transport interchanges which are important for economic development, freight distribution activities and additional employment generation. The quality of connection from the air and sea ports to the internal transport network is crucial for economic competitiveness.
- 1.3 As set out at Para 2.77, the DPS follows the RDS and recognises the Gateway status and strategic economic importance and of Belfast International Airport (BIA) to both Antrim & Newtownabbey Borough and Northern Ireland as a whole and this is welcomed by the Airport. The Airport is a key driver of Foreign Direct Investment in the Council area and more widely in Northern Ireland. BIA is the foremost employer for the Borough and for the Plan area, and **one of Northern Ireland's major** employment sites with 6,000 people currently employed. BIA is also **Northern Ireland's principal airport, and a Gateway into the Province, with 6 million passengers** arriving and departing through the Airport annually. We consider that it is important in RDS, regional and local terms to have a key objective set out within the DPS as suggested below:-

Key Objective 1

To provide for, safeguard and encourage the continued growth of business at Belfast International Airport and its safe and efficient operation in meeting the needs of the travelling public and freight.

- 1.4 **Strategic Policy 1 of the DPS sets out the Council's approach to Sustainable Development** in order to secure the orderly and consistent development of land within the Borough. Within Strategic Policy 1, the DPS proposes a Spatial Growth Strategy at Policy SP 1.6, and at Point (f) states it will seek to *"Strengthen the role of Belfast International Airport as a Regional Gateway"*. BIA fully supports this approach **to strengthen its Gateway status as Northern Ireland's principal airport**, however it is

considered the wording of this Policy should be revised accordingly to ensure the Regional Gateway status of the Airport is provided for, strengthened, safeguarded and protected.

2.0 Draft Plan Strategy

- 2.1 BIA is subject to a number of policies as proposed within the DPS, and commentary regarding these policies is set out below.

Employment

- 2.2 The introductory text of the Employment section of the DPS advises that *"continued economic growth across a range of sectors and the creation of new jobs are key priorities for the Council"*. BIA welcomes this approach. Within the Employment section, 5 no. Strategic Objectives are outlined, with the following objectives of importance and relevance to BIA:-

Objective 1: Promote sustainable growth by managing development and securing new infrastructure provision in our settlements and countryside to meet the needs of all our citizens.

Objective 2: Establish Antrim and Newtownabbey as a premier business location where both existing and new, innovative, cultural and creative enterprise can prosper.

Objective 3: Provide a range and quality of land and premises to facilitate business growth, promote economic diversification and protect our strategically important locations.

Strategic Policy 2: Employment

Innovation, Investment and Enterprise

- 2.3 Policy SP 2.1 sets out that *"the Council will seek to facilitate the growth of up to 9,000 new jobs by 2030 and will operate a presumption in favour of employment-related development"*. Given this ambitious job creation projection, it is fully expected that BIA will make a major contribution to the growth of new jobs within the Borough over the Plan period, which again demonstrates its significant economic importance. The associated policies of the new LDP that will be brought forward in respect of proposed job creation must fully support, facilitate and promote the sustainable future development of the Airport.

Employment Land

- 2.4 Policy SP 2.2 sets out that *"the Council will identify and safeguard a range of sites for industrial/employment activity and business use in the Local Policies Plan"* which includes BIA amongst other locations. The proposed designation of BIA as

employment land within the DPS is welcomed. Policy SP 2.3 provides further amplification and advises that *“the Council will operate a 'Two-Tier' approach to the identification of land and premises for industrial/employment activity and its subsequent retention and protection from alternative use based on:-*

(a) Strategic Employment Locations; and

(b) Local Employment Sites”

Strategic Employment Locations

- 2.5 Policy SP 2.5 identifies a number of existing strategically located industrial/employment sites (generally 10 hectares or greater in size) that will be **designated as 'Strategic Employment Locations' (SELs)**. BIA fully concurs with the DPS designation of the Airport as a SEL, as it recognises the important economic/employment status the Airport retains. This designation was previously proposed within the BIA representation submitted in response to the Preferred Options Paper.
- 2.6 Policy SP 2.5 also sets out that the precise boundaries of each SEL will be brought forward in the Local Policies Plan. In relation to the Airport SEL, it is of critical importance that this designation does not conflict with or have a negative development impact upon the Airport Operational Area or the operations of the airport therein, as appended at Annex 1. In terms of the designated SEL boundary, it is considered that the boundary of same can align with the current Airport Operational Area in order to facilitate the appropriate future development and growth of the Airport SEL that is centred on BIA, but at the same time provide flexibility that in the event that airport operations require to be situated on the Airport SEL designation, flexibility is included within the plan to permit and support same. The associated wording of the policy, that will establish the SEL boundary at Local Policies Plan stage, should reflect same accordingly.
- 2.7 Policy SP 2.7 advises that the Council will operate a presumption against the alternative use of land and premises in SELs to safeguard them for future employment purposes. However, Policy SP 2.8 specifically relates to the Airport SEL and states that *“the Council will operate a presumption in favour of a wide range of industrial, business, airport related and other complementary employment and service uses on the lands zoned at this location for airport related use until such time as the boundary of the SEL at BIA is identified. In addition, the Council will, in principle, support development at BIA that accords with or complements the published Airport Masterplan 2030”*.

- 2.8 In respect of Policy SP 2.8, it refers to other complementary employment and service uses, and that there will be a presumption in favour of same which is welcome – this is further referenced at Para 2.9 below. In order to avoid any ambiguity in relation to complementary employment and service uses, a glossary of such uses at the Airport should be provided and BIA would commend a list of such activities as appended at Annex 2, including those as previously set out within the response to the Preferred Options Paper. As contained within the Preferred Options Paper representation, we emphasise the significant economic benefit that can be created by allowing commercial development within the proposed Airport Operational Area/SEL and the Plan Strategy must protect same. This is reinforced at Para 5.15 of the DPS whereby it states that *"BIA is and will continue to be an important driver for a wide range of economic development and employment opportunities over the Plan period"*.

Policy DM 1: Economic Development – Zoned Sites and Settlements

Strategic Employment Locations

- 2.9 Policy DM 1.1 sets out a number of uses that will be directed towards Strategic Employment Locations (SELs), which in effect outlines acceptable and appropriate uses at the Airport:-

- (i) Large scale industrial development;
- (ii) Business uses;
- (iii) Call centres;
- (iv) Research and development facilities;
- (v) Logistics; and
- (vi) Storage and distribution.

Whilst it is welcomed that the aforementioned uses will be acceptable at the Airport SEL, **consistent with the other SEL's in the wider plan** area the Policy unfortunately does not reflect the strategic objectives set out regarding the wider range of airport related and complementary uses. The policy only refers to uses that fall within Part B of The Planning (Use Classes) Order (Northern Ireland) 2015. However, it is considered that various other uses that fall within different use classes, and which are entirely appropriate for the Airport SEL, should be contained within the wording of the policy specific to the Airport SEL, and as such the policy needs to set out in greater detail such appropriate uses at the Airport SEL. The concept of SEL, for example, draws a distinction as to the limited acceptable uses at Nutts Corner SEL. As such, BIA believe that it is necessary and would welcome the inclusion of additional clarification of the additional acceptable uses specifically in relation to BIA

and its SEL within the adopted Plan Strategy. The BIA Preferred Options Paper representation (refer to Annex 2) sets out additional appropriate uses for the Airport Operational Area in order to support the sustainable operation of BIA. As the Council will be aware, planning permission was previously granted under reference T/1997/0533 at BIA for a mixed use development that comprised similar uses to those appended at Annex 2.

Strategic Policy 3: Transportation and Infrastructure

Transportation Schemes

- 2.10 Policy SP 3.2 identifies a number of future investment priorities in respect of transportation schemes that will improve the connectivity of the Borough. Within the outlined priority schemes, the policy refers to *“improved accessibility and connectivity to and from BIA, a strategically important Gateway into the Region”*. This approach **is welcomed by BIA. This subject was addressed within BIA’s Preferred Options** Paper representation whereby infrastructure improvements may be required to encourage the growth of the Airport over the Plan period. The following infrastructure developments, as proposed by BIA, fall under the umbrella of improving connectivity to the Airport: -

- (i) Motorway spur from the M2 leading to the Airport;
- (ii) Passenger rail connection to the Airport; and
- (iii) Improved public transport services direct to/from the Airport for all parts of the Region and directed at lower income areas within the Borough and Greater Belfast in order to enhance employment opportunities.

Car Parks

- 2.11 Policy SP 3.12 refers to the provision of car parking for users of BIA on lands allocated for airport related uses at the airport. BIA supports the introduction of a policy within the Plan Strategy to protect the Airport from the plethora of unauthorised off-site car parks situated in close proximity to BIA.
- 2.12 BIA advises that all existing and future car parking requirements can be fully accommodated within the Airport Operational Area. This position is supported by the International Civil Aviation Organisation who recommends that passenger car parking should be as close as possible to their departure destination i.e. the airport itself, in order to minimise traffic movements and to enable airport traffic to be directed along roads and routes designated for this purpose.

- 2.13 The operation of unauthorised car parks in close proximity to BIA is impeding the future sustainable growth of the Airport. Such car parks are characterised by their parasitical activity that brings little or no economic benefit and are detrimental to the **Airport's investment and growth strategy as revenue which could be used to attract** new routes is lost to ongoing unauthorised activities. As such, it is incumbent upon the Council to deliver a robust car parking policy that will ensure all car parking proposals are located within the Airport Operational Area to facilitate orderly and sustainable approach to development. In terms of the proposed wording of the policy, we would suggest the following:-

Policy SP 3.12 – Car Parking at BIA

The Borough Council will not permit proposals for new car parking for users of BIA on off-Airport sites to ensure a more sustainable approach to surface transport access to the Airport.

Belfast International Airport - Operations

- 2.14 At Policy SP 3.15, **reference is made to the Council's support for proposals** necessary to maintain, improve or expand existing operational facilities at BIA to meet anticipated growth needs and this approach is welcomed by BIA. The operational aspect of BIA is amplified under Policy DM 13.

Policy DM 13: Belfast International Airport – Operations

- 2.15 Policy DM 13.1 **sets out that** *"the Council will support development within the operational boundary of BIA where this is needed to maintain the current operational requirements of the Airport or where it forms part of a scheme for the improvement to or an appropriate level of expansion of existing facilities"*. This is welcomed.
- 2.16 Further, Policy DM 13.2 defines the acceptability of development proposals. It is considered the acceptability criteria within this policy can be refined, and a revised wording is set out as follows:-

"The proposal is directly related to the operational requirements of the Airport; is clearly related to and dependent upon a site adjacent to the facility or otherwise; represents an improvement to or logical extension to existing facilities and activities of the airport; and is subject to having an acceptable environmental impact".

DM 13.3 Airport Safety Zones

- 2.17 Policy DM 13.3 refers to the restriction of development within the identified BIA Public Safety Zones **in accordance with the 'Control of Development in Airport Public Safety Zones' policy. BIA agrees with this policy.**

DM 13.4 Major Noise Zone

- 2.18 Policy DM 13.4 sets out that there will be *"a presumption against development in the vicinity of Airport that would be subject to unacceptable amenity impact by virtue of aircraft noise disturbance. In assessing proposals, the Council will have regard to the major noise zone around BIA as identified on the DAERA website noise level map viewer. Details of the noise zones will be brought forward in the Local Policies Plan"*. BIA agrees with this policy **and the protection afforded to BIA's operations.**

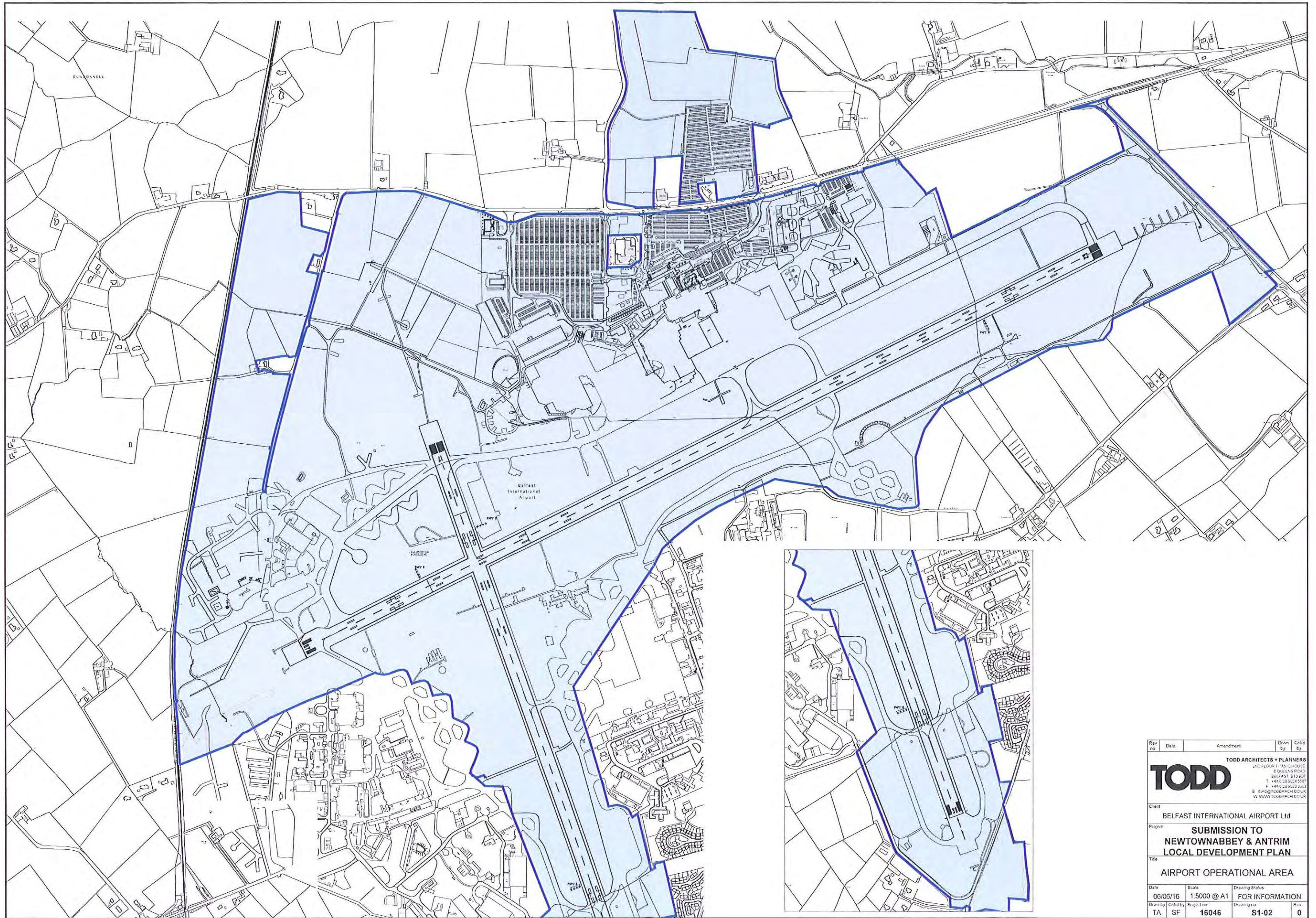
DM 13.5 Airport Safeguarding

- 2.19 Policy DM 13.5 advises that the Council will consult with the Airport operator in relation to all wind and solar energy proposals in the Borough as well as proposals for tall structures within the Airport Safeguarding Zone. BIA agrees with this policy.

3.0 Conclusion

- 3.1 The Draft Plan Strategy forms a key part of the overall Local Development Plan (LDP) 2030 process, and will provide a spatial land use policy framework to guide development and encourage investment over the Plan period within the Borough of Antrim & Newtownabbey.
- 3.2 The Draft Plan Strategy will positively assist with the formation of the Local Policies Plan, which is the next key stage of the LDP 2030 process, and as such it is imperative that the strategic policies within the Draft Plan Strategy, once adopted, protect, promote, advocate and facilitate the sustainable expansion of the Airport. BIA would highlight the important role it plays in the Borough as a major employer, contributor to the local economy and largest rate payer, and secondly as **Northern Ireland's premier airport**.
- 3.3 At present, BIA faces a number of challenges to its future growth and expansion. For instance, the level of the unauthorised car parking sites outside of the Airport Operational Airport is a major concern, and BIA would reiterate that all future parking provision for passengers, visitors and staff must be located within the Airport site. There is also an evident need to invest in surface infrastructure, such as road and rail, to ensure the anticipated growth in passenger traffic can be catered for. BIA requests that the Council prepares robust policies to deal with these issues, and in particular protection from unauthorised car parks in proximity to the Airport.
- 3.4 This representation sets out the views of BIA in respect of the policies contained within the Draft Plan Strategy, and accordingly we respectfully request that the comments provided within this document are given favourable consideration by the Council in relation to the adoption of the Plan Strategy. We respectfully reserve the right to make further representations throughout the course of the LDP 2030 process.

Annex 1 – Airport Operational Area Drawing



Rev no	Date	Amendment	Drawn by	Check by
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Project SUBMISSION TO NEWTOWNABBEY & ANTRIM LOCAL DEVELOPMENT PLAN				
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Annex 2 – BIA Appropriate Uses

To support the sustainable operation of Belfast International Airport and associated future development, the following uses shall be considered as appropriate and acceptable within the designated Airport Operational Area:-

- (i) Aircraft Maintenance Hangars
- (ii) Airline Engineering Facilities
- (iii) General Aviation Facilities/Fixed Base Operator Facilities
- (iv) Motor Transport Buildings
- (v) Terminal & Associated Airport Operational Uses
- (vi) Air Cargo Complexes
- (vii) Freight Warehouses
- (viii) Distribution Centres
- (ix) Cold Stores
- (x) Light Industrial Units
- (xi) Research & Development Units
- (xii) Business Units
- (xiii) Offices
- (xiv) Data Centres
- (xv) Retail
- (xvi) Hotel
- (xvii) Call Centres (including Serviced Offices)
- (xviii) Petrol Filling Station with Convenience Store
- (xix) Bars and Restaurants
- (xx) Airport Lounges
- (xxi) Creches and Fitness/Leisure Suites
- (xxii) Railway Station
- (xxiii) Aircraft Parking Aprons
- (xxiv) Airport Car Parks
- (xxv) Car Hire
- (xxvi) Car Parking
- (xxvii) New Roads