



Antrim and Newtownabbey Borough Council

Local Development Plan 2030

Draft Plan Strategy

Invest NI Comments – 20 September 2019

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

Regional Development Strategy 2035

6. The RDS guidance that we have particularly focused on, either in whole or in part, includes the following
- RG1 – Ensure an adequate supply of land to facilitate sustainable economic growth
 - SFG10 - Identify and consolidate the roles and functions of settlements within the clusters
 - SFG11 - Promote economic development opportunities at Hubs
 - SFG15 - Strengthen the Gateways for regional competitiveness

Strategic Planning Policy Statement

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

Community Plan

8. The Council’s “Love Living Here” Community Plan sets out the vision for the Antrim and Newtownabbey through to 2030 to be a “resilient, socially responsible community where citizens enjoy a high quality of life.”
9. Underpinning this vision are four outcomes and a “wildly important goal” each with their own priorities which are expected to be delivered through a number of actions/policies. One of these outcomes is “**our citizens benefit from economic prosperity**” and below this sits the following priorities
- Our local economy thrives, with local businesses starting up, growing, expanding and generating employment
 - Enterprise and innovation are encouraged and supported from an early age to build businesses and entrepreneurs of the future
 - Our area has a skilled population and infrastructure which is attractive to investors and employers
 - Barriers to accessing employment are reduced or removed enabling all of our citizens to have equitable access to the opportunities available in the Borough.

Draft Strategy Comments

Plan Vision and Strategic Objectives

10. The LDP vision for the borough is set out on Page 54 namely that *“in 2030 Antrim and Newtownabbey Borough will have a reputation as an excellent, attractive and diverse place in which to live and work. It will be a place that all citizens can take pride in and that is appealing to new residents, investors and visitors alike, with improved job opportunities, housing availability and connectivity that meets the needs of our community. Development will be sustainable and of high quality and will address the ongoing challenges of climate change. Our built and natural environment will continue to be high quality and well looked after and will support prosperity and economic development and provide for a wide range of recreational and leisure activities.”* In summary Antrim and Newtownabbey Borough will be
 - A Place of Economic Opportunity
 - A Vibrant and Liveable Place
 - A Place with a Sustainable Future
11. To support and help achieve the Plan Vision a series of Strategic Objectives have been developed.
12. Paragraph 3.5 states *“employment land and premises are essential to the future economic prosperity and growth of our Borough. The identification of a wide range of suitable opportunities is therefore a key role for the LDP and will support the Council’s Economic Strategy. In addition it is important that those employment/business sites that perform a strategic function are given strong protection from being lost to other development uses”*.
13. The five strategic objectives linked to economic development are detailed on Page 58 and in summary are as follows
 - Establish the borough as a premier business location
 - Provide a range and quality of land and premises for economic growth and protect strategically important locations
 - Promote development and regeneration of town centres/commercial areas
 - Support sustainable tourism
 - Improve accessibility, connectivity and ease of movement and promote sustainable travel

Sustainable Development – Spatial Growth Strategy

14. The draft Strategy, as noted on Page 65, will focus core growth in Metropolitan Newtownabbey and Antrim as the primary locations for future housing, economic growth and investment. Ballyclare will see its large town role consolidated and strengthened based upon existing committed development allocations as a key centre for housing, employment, facilities and services to support a growing population and its wider rural hinterland. The towns of Crumlin and Randalstown will see their roles as local service centres for housing, employment, facilities and services consolidated to support the local population.
15. Within the Borough's settlements the focus of growth will be on sites allocated or otherwise identified for development in the Local Policies Plan. These sites will be safeguarded for the use(s) identified and where necessary Key Site Requirements identified. In all locations those proposals that re-use or make better use of vacant, derelict or under-used brownfield land or buildings will be supported where they are in accordance with the relevant policies of the LDP.
16. Delivering Sustainable Outcomes as detailed from Policy paragraphs SP1.13 to SP1.17 inclusive cover the matter of developer contributions. Before commenting further Invest NI would point the Council to Paragraph 7 of its POP response, this position remains unchanged.
17. As stated at Policy paragraph SP1.13 *“developers will be expected to provide and meet the costs of infrastructure and other works required to facilitate and sustain their proposals. In appropriate cases the Council will seek contributions from developers where these are necessary for infrastructure delivery or to manage and/or mitigate the impact of the development on our Borough's services and environment.”* Invest NI notes, given the use of word “appropriate”, that contributions such as those required will not be sought in every instance, this is to be welcomed.
18. We note that the Council intends to bring forward supplementary planning guidance to explain in greater detail how developer contributions will be implemented through the planning process and the scale of contributions likely to be required. Invest NI would welcome the opportunity for further engagement with the Council as the guidance is developed.

Employment

19. Invest NI notes and welcomes comments at Paragraph 5.4 confirming that the Council is committed to *“promoting a vibrant economy, assisting*

existing employers, attracting new firms and supporting business start-up.” Paragraph 5.5 confirms the role of the Local Development Plan “*is to facilitate continued employment growth that meets the needs of our Borough in a sustainable manner*”.

20. We note the Strategic Objectives as detailed on Page 75 and as previously summarised within this document and recognise their role in facilitating sustainable economic growth in the Borough, particularly Strategic Objective 3.
21. As noted at Policy paragraph SP2.1 the Council will seek to encourage the growth of indigenous businesses, promote innovation, proactively attract investment and facilitate the growth of up to 9,000 new jobs by 2030. It will also operate a presumption in favour of employment related development subject to certain provisions.
22. Policy paragraph SP2.2 confirms the Council will identify and safeguard a range of sites for industrial employment activity and business use in the Local Policies Plan focused on Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin, Randalstown, Belfast International Airport and Nutts Corner. Invest NI welcomes the identification and safeguarding of land for economic development as it believes that the availability of a range of sizes and locations of such land is an important factor in attracting investment.
23. Invest NI notes that the Council proposes to operate a two-tier approach to the identification of land and premises for industrial/employment activity and its retention/protection from alternative use. This approach will be based upon Strategic Employment Locations and Local Employment Sites. There is no intention to identify sites for employment related developments in the smaller settlements. Such proposals are, however, encouraged provided they are appropriate in scale, nature and design to their location.
24. The Council has identified existing strategically located industrial/employment sites as Strategic Employment Locations (SEL) – a list of sites is provided on Page 77. Typically SELs will be 10 hectares or greater in size. As the primary employment sites in the Borough there will be a presumption against the alternative use of land and premises in order to safeguard them for future employment purposes.
25. Within the list of proposed Strategic Employment Locations are two “active” Invest NI landholdings, namely Global Point Business Park and Antrim Technology Park. In terms of available employment lands within the Borough we would contend that these locations offer potential investors, seeking to locate within Northern Ireland, a highly attractive investment and development proposition. Indeed Global Point is highlighted within the RDS at SFG1 as a key location within the Belfast Metropolitan Urban Area that should be protected for economic growth.

26. The Council will also, where appropriate, identify other established industrial and business areas in Metropolitan Newtownabbey the towns as Local Employment Sites. Invest NI assumes these will be sites of less than 10 hectares in size.

Employment Land

27. The Council recognises, as noted at Paragraph 5.10, the need to ensure an adequate supply of suitable employment land and that strategically important employment locations are safeguarded. Invest NI would suggest that such protection should be afforded to all employment lands unless there is a compelling case for a change of use and that any change would not result in an overall significant diminution of employment lands. Paragraph 5.12 confirms that beyond Metropolitan Newtownabbey and the towns the Council does not propose to designate employment lands. The flexibility that this provides in smaller settlements is to be welcomed.
28. To inform their approach to SEL the Council undertook an Employment Land Evaluation Report (ELER). This supported the identification of range of existing SELs focused on the larger settlements as well as Belfast International Airport and Nutts Corner. It also supports, in principle, the identification of two additional SELs, one in Antrim and the other in Ballyclare, to meet future economic growth and job creation needs.
29. Invest NI notes the approach undertaken by the Council in respect of the ELER which was modelled on the RDS Employment Land Development Framework. We would reiterate our comments at Paragraph 18 of our POP response that the Council should consider providing guidance on the range and scale of uses it would consider to be acceptable at each SEL.
30. As set out at Paragraph 5.16 the Council also intends to identify other more locally important employment sites within Metropolitan Newtownabbey and the towns, Local Employment Sites (LES). From the perspective of offering potential investors a variety and choice of investment locations this is to be welcomed.
31. It is also stated, however, that in certain circumstances comprehensive mixed use redevelopment schemes may be acceptable where this introduces community gains and allows vacant or underused land to return to productive use.
32. We would refer the Council to our comments at Paragraph 16 within our POP response. We encourage the Council to ensure that such locations are also afforded strong policy protection as they can provide opportunities to those businesses for which a setting within a SEL may not be suitable.

33. Furthermore Invest NI would contend that none of its property within the Borough, and particularly that at Antrim Technology Park and Global Point, should be considered as either vacant or underused. Our property benefits from appropriate planning permissions granting approval for industrial development and is held in support of such projects brought forward from within our customer base, which will enhance the Northern Ireland economy.

Economic Development – Zoned Sites and Settlements

34. **Policy DM 1: Economic Development – Zoned Sites and Settlements.**

The provisions of this policy at Policy paragraphs DM1.1 and DM1.2 are consistent with PED7 of PPS4 and Paragraph 6.89 of the SPPS. Invest NI welcomes the protection of SELS from competing land uses beyond a sui generis employment use that will not lead to a significant diminution of the role of the SEL.

35. Policy paragraphs DM1.3, DM1.4 and DM1.5 apply to LES. Invest NI would highlight that these paragraphs could represent a departure or at least a relaxation of the protection afforded to such land through PED7 of PPS4 and Paragraph 6.89 of the SPPS.

36. We note at Policy paragraph DM1.4 that the Council would propose to consider alternative uses within these sites in the specified circumstances within a 12 month timeframe. Invest NI would suggest this could be a low threshold and would suggest, if the Council wishes to retain this provision, that 36 months might be more appropriate. There may, for example, be circumstances in which a property has been vacated, such as through bankruptcy, where a 12 month timeframe may not allow sufficient time for a property to be marketed and a new owner identified.

37. Policy paragraph DM1.4 (b) refers to the marketing of the site but does not provide any detail as to the evidence the Council would consider as offering sufficient proof. Invest NI would suggest that amplification of this policy would be helpful in identifying the robust evidence base required to allow such loss of an economic development land resource. Examples of such evidence could include marketing details such as property brochures from a property agent, links to listing on an agent's website and/or a record of interests and viewings by potential occupiers.

38. The unintended consequence of enacting the provisions of this policy from an Invest NI perspective is that it could quickly lead to a significant reduction in the variety and choice of potential investment locations across the borough as well as the overall employment land supply. It may therefore be prudent for the Council to consider the suitability of

introducing a threshold for the number of LE sites, or quantity of LE land that could be released in this way, or a minimum quantity of such land that should be retained, over any given period, such as the LDP review cycle. Alternatively, Council may wish to consider setting a threshold for the quantity of LE land that will be retained. We have noted at Paragraph 32 above that a SEL may not be suitable for every business and it is important to ensure the continued availability of alternative investment locations.

39. Furthermore we note that the draft Strategy does not currently propose any policy mechanism or timetable which would facilitate the review of the loss of LES land. This maybe a matter that the Council may wish to reflect on. Given that LES could be up to 10ha in size, the loss of relatively few of them could make a significant impact on the overall economic development land provision in the borough.

Economic Development - Countryside

40. **Policy DM 2: Economic Development Countryside.**
The provisions of this policy largely align with the policy provisions of Paragraph 6.88 of the SPPS and PED 2 – 6 inclusive of PPS4.
41. Policy paragraph DM2.8 of this policy facilitates the redevelopment of existing industrial or business enterprises to provide suitable tourist, recreation or community facilities. It is Invest NI's view that this represents a slight amendment from PED 4 which had made some exceptions for potential social and affordable housing developments on former business/industry sites in the countryside.

Economic Development – Incompatible Uses

42. **Policy DM 3: Economic Development – Incompatible Uses.** The provisions of this policy are consistent with Policy PED 8 of PPS4 and Paragraph 6.90 of the SPPS. We note that the Council has confirmed a policy commitment to apply PED 8 supplementary planning guidance.

Farm Diversification

43. **Policy DM 5: Farm Diversification.**
The provisions of this policy are consistent with CTY 21 of PPS4 and Paragraph 6.87 of the SPPS.

Development Within Centres

44. **Policy DM 6: Development within Centres.**

Invest NI welcomes the Council's commitment to support a diverse range of retail and complementary uses within the Borough's centres provided these support rather than detract from the successful functioning of the centres.

45. Invest NI would suggest that it might be useful for the Council to provide some amplification around what it might consider acceptable complementary uses to be. Invest NI would propose that business uses including office, particularly those falling within B1(a) of the Planning (Use Classes) Order should be included in the list of uses which are considered as acceptable.

Integration of Transportation and Land Use

46. Invest NI notes that the Council will work with statutory partners to actively promote and manage sustainable patterns of growth. A key element of this will be for new developments to bring forward measures that will promote enhanced pedestrian and cycle linkages to surrounding services and facilities.

47. Invest NI in principle has no objection to this but would remind the Council that for industrial developments there may be public safety issues. Industry by its nature can pose a range of dangers to the public, and particularly children, whether it is through industrial processes or traffic. With enhanced pedestrian and cycle linkages this enables greater public/non-industrial access to industrial property. Every effort should be made to minimise such risks.

Conclusion

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

-----Submission ends-----

Antrim and Newtownabbey Local Development Plan 2030

Preferred Options Paper: Consultation Response from Invest NI

April 2017

1. Invest NI welcomes the opportunity to comment on the Antrim and Newtownabbey Local Development Plan Preferred Options Paper (POP).
2. It is important to note that Invest NI can only comment on the needs of those companies which meet its intervention criteria, these businesses will primarily be those which can drive productivity and make the greatest contribution to growing the economy.
3. In preparing the Local Development Plan (LDP) the Council should ensure that it makes sufficient provision for those business that fall outside our remit; typically these will include those involved in areas such as distribution, logistics and retail.
4. We note that the vision of the Council as set out on Page 29 includes an aspiration to make Antrim and Newtownabbey an excellent and attractive place to work that is appealing to investors and offers improved job opportunities meeting the needs of the community.
5. The organisation welcomes paragraph 3.4, particularly the recognition of the importance of land and premises to economic prosperity and growth. We would highlight the importance of providing a choice and variety of sites across the Plan area to respond to the changing nature and requirements of business and industry.
6. In paragraph 3.9 the Council notes that through the LDP it has a desire to facilitate new growth and development and with this an adequate provision of infrastructure. It is proposed that where necessary development proposals will be required to deliver and bear the cost of any infrastructure works necessary to accommodate them.
7. Generally speaking, whilst Invest NI can appreciate the application of a “developer pays” principle in respect of private sector developments where the primary motivation might be the generation of financial benefit for the developer it would caution against its application in respect of public sector developments where wider societal benefits are the driving force rather than profit. In such cases, it could be considered that delivery for the greater economic good is community benefit in and of itself. In addition, the imposition of such additional cost has the potential to adversely affect, and potentially inhibit, project deliverability.
8. Invest NI notes the Plan objectives as set out on Page 31 and, in particular, the prominence given to the management/delivery of economic development.

9. Pages 54 and 55 consider the development of a new District Centre at Mossley West adjacent to Invest NI's Global Point Business Park. If, as is suggested, a designation of this nature was to lead to a rebalancing of office v industrial provision at Global point in favour of office, that would seem entirely appropriate given the changing nature of employment as noted in paragraph 4.86 of the POP.
10. We would, however, welcome the opportunity to further engage with the Council on the matter to better understand its plans and any further implications a District Centre designation might have for Global Point.

Strategic Employment Locations

11. Invest NI welcomes the statement at paragraph 4.84 affirming that employment and economic growth is a key priority for the Council.
12. The key role of the LDP in zoning land to support economic growth and developing planning policy to support business development and job growth is recognised in paragraphs 4.85, 4.87, 4.93 and elsewhere.
13. As also outlined in paragraph 4.93 Invest NI welcomes the recognition of the need to protect such zonings from competing land uses. It has been Invest NI's experience that across Northern Ireland such areas can come under pressure for residential or retail led mixed use developments. Typically once an area is lost from industrial/economic development to a higher value alternative use it will never return to its former status.
14. Invest NI notes that it is the preferred option of the Council to identify existing employment sites of over 10 hectares as Strategic Employment Locations and consider the designations of new SELs in Antrim, Ballyclare, Crumlin and Randalstown.
15. We would concur with the Council's view in paragraph 4.99 that any future SEL should be situated in or near the largest settlements and in a favourable position in relation to key transport infrastructure. It is our experience that accessibility for the workforce and ease of distribution of product are important factors in such developments.
16. Invest NI notes that proposed new SELs will be complemented by a range of smaller non-strategic industrial and business areas to provide for a wide range of local employment opportunities. We would encourage the Council to ensure that such locations are also afforded strong policy protection within the LDP as they can provide opportunities to those businesses for which a setting within a SEL may not be suitable.
17. As detailed in paragraph 4.111 we note that the Council proposes to consider a Strategic Employment Location at Belfast International Airport in order to allow for the development of a range of suitable uses that would complement the operations of the airport.

18. Invest NI would suggest that the Council might wish to consider providing guidance on the range and scale of uses it would consider to be acceptable at each SEL. The inclusion of such information could prove useful to those seeking to take forward investment projects within these locations as it could provide them with a greater degree of confidence in respect of achieving a planning approval. It is of note that overly strict or inflexible guidelines may ultimately become a constraint on development. Balance is therefore important.
19. The introduction of Simplified Planning Zones in certain areas, such as SELs, could be particularly attractive to investors. We understand that this is something other Councils are actively considering at this time.

Countryside

20. Invest NI notes at paragraph 4.113 that the Council proposes to continue to consider most development within the countryside in light of planning policies to be brought forward within the new LDP. These will be in broad conformity with the Strategic Planning Policy Statement.
21. We welcome the potential for continued economic development opportunities in the countryside. Many businesses in rural locations will have arisen in response to a particular need it is important therefore that they be afforded some opportunity to develop and grow in situ. The cost implications of moving a small rural business to a larger settlement can be prohibitive and limited local growth will allow them to reach a stage of financial capability to make such a move affordable in due course.
22. As set out in paragraph 4.118 Invest NI notes the intention of the Council to consider a Rural Strategic Employment Location at Nutts Corner. In principle Invest NI would be supportive of this proposal as it will enhance the variety and choice of potential investment locations and may particularly appeal to those businesses seeking or requiring a more rural location or wishing to take advantage of its good physical connectivity.

Planning Policy

23. Invest NI notes that it is the intention of the Council to review existing policies and where it is felt necessary to bring forward updated policies to meet the needs of the Borough. We are supportive of the Council's decision to place Sustainable Economic Growth as its number one Overarching Primary Principle (Page 99)
24. Overarching Primary Principle 7 (paragraph 6.23) relates to community benefits. This states that developers will be expected to meet the costs of

infrastructure and other works required to facilitate and sustain their development proposals. We would reiterate our comments at Paragraph 7 above.

Employment and Industry

25. Invest NI notes that the Council has undertaken a review of current operational planning policy and found it to be generally acceptable.
26. As regards the drive to promote mixed use development (Page 104, paragraph 6.29, bullet point 4) we recognise that proposals of this nature can be beneficial. We would, however, urge caution in respect of the balance of proposed uses which will be important factor in ensuring the vitality of any proposed development. In particular, the potential for apparently benign uses to adversely impact, or even inhibit, future development is an important consideration and must not be underestimated.
27. Invest NI recommends that any industrial element of a mixed use proposal should be served by separate entrance arrangements in order to preserve public safety. Industry can by its very nature pose a range of dangers to the public, particularly children, whether it is through industrial processes or traffic and every effort to minimise risks should be made.

Built Heritage

28. Invest NI is supportive of paragraph 6.70 which recognises the importance of Northern Ireland's built heritage and how such sites can be beneficial to the economy through regeneration.
29. Former industrial premises are an important part of our built heritage. We recognise there may be instances where such properties do not easily lend themselves to modern industrial use, with sympathetic restoration works, however, they may offer opportunities for new development which could include office or other workspace provision.

>>>End of submission>>>