



## **Lisburn and Castlereagh City Council**

### **Local Development Plan 2030**

#### **Draft Plan Strategy**

#### **Invest NI Comments – January 2020**

1. Invest NI welcomes the opportunity to consider the soundness of the Lisburn and Castlereagh City Council Local Development Plan Draft Plan Strategy 2032 (the draft Strategy). Our comments should be read in conjunction with those made in relation to the Council's Preferred Options Paper (POP) in May 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. A copy of our POP response is included as an Annex to this response for your convenience.

## **Vision and Plan Objectives**

6. Invest NI notes the vision of the draft Strategy, as set out on Page 32, is to “respond to the needs of the community in providing a sustainable economy, society and environment. It will support a thriving, vibrant and connected place in which people live, work, visit and invest; and an attractive, green and quality place which will enhance the wellbeing and quality of life for all.”
7. This vision is underpinned by six plan objectives namely;
  - A Quality Place
  - A Thriving Place
  - A Vibrant Place
  - An Attractive Place
  - A Green Place
  - A Connected Place

These link directly and are implemented through the strategic policies, spatial strategy and operational policies as detailed within the draft Strategy.

8. Invest NI’s particular focus will be on “A Thriving Place” which will seek to drive sustainable economic growth. We will also comment on aspects of other objectives where we consider them to have a particular resonance with economic development.
9. It is through the strategic policies and spatial strategy set out within ‘A Thriving Place’ that the Council will, in summary
  - Support a thriving economy with a sufficient supply of land
  - Accommodate population growth to ensure a continuous supply of labour
  - Promote mixed use development at strategic locations
  - Promote access to higher and further education
  - Support Lisburn City, the towns and villages as employment and service centres
  - Support the provision of infrastructure
  - Manage mineral resources in a sustainable manner

## **Strategic Policies and Spatial Strategy**

### **Strategic Policy 01 Sustainable Development**

10. The draft Strategy will support development proposals which further sustainable development including promoting balanced economic growth and supporting sustainable infrastructure.

### **Strategic Policy 04 Supporting Sustainable Economic Growth**

11. The draft Strategy will support development proposals that further sustainable economic growth without compromising on environmental standards. Invest NI notes that strengthening employment activity will be encouraged through the provision of a range of employment sites across the Council area offering flexibility and choice for investors; this is to be welcomed.

### **Strategic Policy 07 Section 76 Planning Agreements**

12. Invest NI's specific comments on the principle of Planning Agreements/Developer Contributions can be reviewed in its response to the POP at Paragraph 33.
13. As regards the draft Strategy proposals Invest NI notes that Section 76 Planning Agreements can be used to address issues to the granting of planning permission where these cannot be addressed through the use of appropriate planning conditions. It may also require a sum or sums to be paid to the Council.
14. In order to mitigate the impact of development Agreements will be sought to provide necessary community facilities/infrastructure. The Section 76 Planning Agreements Framework will provide the structure and requirements for planning agreements for new developments. Invest NI notes that the Agreements will be negotiated on a site-by-site basis where they are considered necessary.
15. Invest NI would request the opportunity to engage with the Council as it the Framework is developed.

### **Spatial Strategy**

16. Invest NI notes the proposed settlement hierarchy. We furthermore note that the Council will allocate employment land to provide an adequate and continuous supply, taking account of accessibility to major transport routes and proximity to sustainable locations near large centres of population.

Sustainable development in the countryside in line with prevailing regional planning policy will be accommodated. Both of these elements are to be welcomed.

### **A Thriving Place – Driving Sustainable Economic Growth**

17. The seven actions that that the Council intend to adopt to drive sustainable economic growth to appropriate locations within the Council area are outlined on Page 70 and previously highlighted at Paragraph 9 above.
18. Invest NI notes the strategic context as detailed within the draft Strategy in respect of economic development. We note, however, there is no specific reference to PPS 4.

### **Strategic Policy 11 – Economic Development in Settlements**

19. Invest NI notes the provisions of Strategic Policy 11, the commitment by the Council to retain a continuous supply of developed and undeveloped economic land throughout the plan period and the key recommendations of the Office Study. We would highlight, that in our view, SP10 (c) has the potential, as written to conflict with Policy PED7 of PPS4. The proposed supplementary operational economic development policy (ED7) clarifies that the proposed operational policy is consistent with the established regional policy.

### **Strategic Employment Allocation**

20. Invest NI notes the draft Strategy's approach to strategic employment land allocation. There is no reference to the Maze lands being considered a 'Simplified Planning Zone" which is a departure from the Council's potential strategic development scenarios as outlined in the Preferred Options Paper.

### **SMU01 West Lisburn/Blaris**

21. The draft Strategy details the requirements for the proposed Strategic Mixed Use (SMU) site at West Lisburn/Blaris. Development should also be accordance with an overall Concept Masterplan including a Transport Assessment to be agreed with the Council.
22. Invest NI notes the Requirements and in particular that approximately 50% of the developable area should be for employment use with the remainder allocated for residential dwellings. We would restate our

comments to the POP (attached) specifically paragraphs 28 to 31 inclusive.

23. We welcome the potential for B1(a) office provision up to 10,000 square metres where it can be demonstrated that the proposal cannot be accommodated within Lisburn City Centre.

#### **SMU02 Purdysburn/Knockbracken**

24. The draft Strategy confirms that it will support the development of the proposed Strategic Mixed Use site at Purdysburn/Knockbracken in accordance with an overall Concept Masterplan incorporating a Transport Assessment to be agreed with the Council.
25. Invest NI notes the Key Site Requirements and would restate our comments to the POP specifically paragraphs 36 and 37.
26. There are no minimum or maximum quantum provided for the residential or economic uses proposed, this could result in residential use becoming the predominant use at this location and undermine the potential development of the site for strategic employment uses. The Council may wish to reflect further on the balance of development types on this Strategic Site.
27. We welcome the potential for B1(a) office provision up to 3,000 square metres where it can be demonstrated that the proposal cannot be accommodated within Lisburn City Centre.

#### **Local Employment Sites**

28. Invest NI concurs with the comments on Page 82 around the importance of providing for a range and type of business and employment opportunity sites across the Council area. We note the strategic approach taken by the draft Strategy to the zoning of such sites which has regard to the proposed strategic settlement strategy.

#### **Strategic Policy 12 – Economic Development in the Countryside**

29. Invest NI notes the strategic policy for economic development within the countryside. 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 ability for major proposals to be considered as acceptable within a countryside location is also to be welcomed.

### **Strategic Policy 14 – Town Centres, Retailing and Other Uses**

30. Invest NI notes the draft Strategy will support development proposals within the City and town centres to enhance their vitality and viability. Whilst this is to be welcomed it will be important to ensure an appropriate balance of uses including those linked with employment such as office.
31. As regards office development we note the recommendations of the Office Capacity Study as detailed on Page 98, particularly around flexible offices, development in existing settlements and future potential at Forestside.

### **Strategic Policy 15 Evening/Night-time Economy**

32. Invest NI would restate its comments from paragraph 28 above regarding the need to ensure an appropriate balance of uses.

### **Strategic Policy 20 Transportation Infrastructure**

33. Invest NI notes the draft Strategy will support development proposals which will, amongst other aims, provide or improve an integrated transport network servicing the needs of the community and future growth. From an economic development perspective transportation is imperative to ensure the effective movement of both people (to/from a place of work) and goods.

### **Local Development Plan 2032 - Operational Policies**

#### **34. ED1 Economic Development in Cities and Towns**

It is Invest NI's view that Policy ED1 is consistent with existing Policy PED1 – Economic Development in Settlements of PPS 4.

#### **35. ED2 Economic Development in Villages and Small Settlements**

It is Invest NI's view that Policy ED2 is consistent with existing Policy PED1 – Economic Development in Settlements of PPS 4.

#### **36. ED3 Expansion of an Established Economic Development Use in the Countryside**

It is Invest NI's view that Policy ED3 is consistent with existing Policy PED3 – Expansion of an Established Economic Development Use in the Countryside of PPS 4.

**37. ED4 Redevelopment of an Established Economic Development Use in the Countryside**

It is Invest NI's view that Policy ED4 is largely consistent with Policy PED4 Redevelopment of an Established Economic Development Use in the Countryside of PPS 4.

We note that the proposed policy removes the exemption in exceptional circumstances for permitting development for proposals for social and affordable housing.

**38. ED5 Major Economic Development in the Countryside**

It is Invest NI's view that Policy ED5 is consistent with Policy PED5 Major Development in the Countryside of PPS 4.

**39. ED6 Small Rural Projects**

It is Invest NI's view that Policy ED6 is largely consistent with Policy PED6 Small Rural Projects of PPS 4.

**40. ED7 Retention of Zoned Land and Economic Development Uses**

It is Invest NI's view that Policy ED7 is largely consistent with Policy PED7 – Retention of Zoned Land & Economic Zoned Land of PPS 4. We note the reference to retailing and commercial leisure development which is ancillary in nature being permitted on economic zoned lands.

We also note that on unzoned land in settlements, residential or community use may be included in regeneration where development of land also includes a significant amount of economic development use. Guidance on the extent to which the term significant might apply would be helpful. We would also reiterate comments made in response to the POP (paragraphs 64-67) on the important health and safety considerations which need to be taken into account around industrial/business facilities particularly in respect of traffic and accessibility by those unused to such environments.

Policy ED7 does not include provision for the re-use or redevelopment of an economic development use or site on unzoned land in the countryside. It may be that this will be considered under a separate policy.

**41. ED8 Development Incompatible with Economic Development Uses**

It is Invest NI's view that Policy ED8 is consistent with Policy PED8 – Development Incompatible with Economic Development Uses of PPS 4.

**42. General Criteria for Economic Development (including extensions)**

It is Invest NI's view that Policy ED9 is consistent with Policy PED9 – General Criteria for Economic Development of PPS 4.

With reference to point (j) we would reiterate previous comments concerning health and safety of pedestrians, cyclists and those unfamiliar with an industrial environment finding themselves in proximity to heavy industrial traffic and plant. In this regard designs should not encourage unauthorised personnel to travel through industrial areas.

## **Conclusion**

40. 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. Some issues have, however, been raised for further consideration and/or clarification.

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



Lisburn and Castlereagh City Council Local Development Plan  
Preferred Options Paper: Consultation Response from Invest NI  
May 2017

1. Invest NI welcomes the opportunity to comment on the Lisburn and Castlereagh City Council 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. It may therefore be beneficial for the Council to engage with representatives of these sectors.
4. We note that the vision of the Council for the LDP and Community Plan as set out on Page 20 is for “an empowered, prosperous, healthy and inclusive community”. The LDP is considered to be a spatial reflection of the Community Plan which in turn has identified five key themes and outcomes. Amongst these is the economy with the outcome being that “everyone benefits from a vibrant economy”.
5. Invest NI notes the 18 supporting outcomes as detailed on Page 21, particularly those aligned with economic development.
6. Within this page we note the confirmation that the Preferred Options have been informed by key social, economic and environmental characteristics of the Council area as provided through the evidence base, key priorities identified within the Community Plan and Regional Policy. Through this a number of Strategic Objectives have been identified which in turn form the basis for the key issues and options set out within the POP.
7. Strategic Objective B: Driving Sustainable Economic Growth sets out the primary economic objectives and as such will be the primary focus of Invest NI’s comments. We will also comment on specific elements of the other objectives as

necessary; these will be elements which in our view have a resonance with economic growth.

### Driving Sustainable Economic Growth

8. Invest NI notes the five objectives as set out on Page 66 namely

- To develop a strategic policy to encourage existing and new businesses to invest with confidence
- To support a thriving and diverse economy providing sufficient land and locations for a range of employment facilitating the creation of new jobs which will accommodate population growth
- To identify Major Employment Locations in the Council area and protect sufficient existing employment land from alternative uses
- To support Lisburn & Castlereagh City, towns and villages as centres of employment and services for their surrounding hinterland
- To manage mineral resources in a sustainable manner, protecting vulnerable landscapes and also safeguarding where appropriate

9. We also note from Page 66 that the provision of employment land across the Council area will be facilitated by an Employment Strategy which will identify the supply and distribution of employment opportunities in the period up to 2030. This will, in turn, be shaped by the options within the paper.

10. The POP identifies six key issues flowing from Strategic Objective B which are

- Safeguarding existing employment land
- West Lisburn/Blaris Major Employment Location
- Purdysburn Mixed Use Site Major Employment Location
- The Maze Lands Strategic Land Reserve of Regional Importance
- Facilitating sustainable rural economic development in the countryside
- Mineral safeguarding zones and areas of mineral constraint

11. Pages 67 and 68 set out the employment policy context and evidence base, these include but are not limited to the Regional Development Strategy 2035 (RDS), the Strategic Planning Policy Statement (SPPS) and the existing development plan.

12. Within the section discussing the SPPS we note the final bullet point relating to the role of the Local Development Plan (Page 68) states that it should "include key site requirements to ensure developers provide necessary infrastructure". Invest NI welcomes and encourages the inclusion of such information within a LDP as it can provide developers with a greater understanding of any infrastructural works which may be necessary to bring development proposals.

13. A further option that the Council may wish to consider which is somewhat aligned to the inclusion of key site requirements is to use the LDP as a means to highlight to developers any potential studies or assessments that they may also reasonably be asked to carry at a minimum by statutory consultees in respect of development proposals. We appreciate that for some sites this may not be possible particularly in instances where the need for such assessments may largely be dictated by the development proposals. There will, however, be some sites where their location, surrounding environment/habitat or history could make this feasible.

14. Invest NI notes and is supportive of the draft Lisburn and Castlereagh Community Plan comments on Page 70 concerning the need to improve both the physical and digital infrastructure of the district to make it attractive for new businesses to locate in and existing businesses to grow.

15. The recognition of the need to improve physical infrastructure is further supported with comments on Page 72 referencing the creation of a land use framework which will allow investment to take place (or perhaps act as an enabler). This also underlines the importance of re-using previously developed (employment) land as it help ensure a supply of economic development sites and can assist with economic regeneration and physical renewal.

16. Invest NI would concur with the need to protect land either currently or last used for economic development purposes from loss to an alternative, potentially high land value use. The agency would also underline the need for strong policy protection with the LDP to guard against such an eventuality.

Key Issue 5 – Safeguarding Existing Employment Land

17. Invest NI notes that for the purposes of the Preferred Options Paper existing employment land comprises both developed (existing employment) and undeveloped (employment) land of 0.5 hectares and over.

18. In line with its comments at paragraph 16 above Invest NI welcomes the recognition of the need to safeguard employment land as detailed on Page 76. It is important that Northern Ireland is able to offer investors a variety and choice of potential investment locations.

19. We note that of the 283 hectares of existing employment land within the district that only 2 hectares remain undeveloped. Of the 264 hectares of land for employment 259 hectares remain undeveloped which the Council equates to a c10 year supply.

20. Options in respect of safeguarding employment land are set out on Page 77; the preferred option presented at 5A being to maintain the current provision of land zoned for employment with the exception of West Lisburn/Blaris Major Employment Location. No new land will be allocated for employment/economic uses.

21. Invest NI can, in principle, appreciate the reasoning of the Council in selecting this as its preferred option. 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.

22. With this in mind we would assume that if the decision of the Council is to not allocate new land for employment/economic uses then it will closely monitor the supply and uptake of employment land as part of its regular review of the Plan. Also that action will be taken as necessary to ensure there is an adequate supply (and variety) of land to facilitate economic growth.

23. We would also reiterate its earlier comment regarding the need to have strong policy protection in place to ensure employment/economic land is not lost to an alternative use.

#### Key Issue 6 – West Lisburn/Blaris Major Employment Location

24. As noted on Page 78 the West Lisburn/Blaris Employment lands provide 119.48 hectares of employment land.

25. The provision of the Knockmore Link Road is considered to be a key piece of new infrastructure central to the zoning of these lands as a Major Employment Location (MEL). However, with a need to provide new housing within the district, it is considered that a portion of this site could be allocated for residential use without affecting its MEL status.

26. The delivery of the Link Road will be secured through developers' contributions by way of an Article 76 Agreement as part of a Comprehensive Masterplan for the site. We note that the Council is also considering the possibility of a Simplified Planning Zone in order to encourage economic development and investment.

27. Options in respect of the West Lisburn/Blaris lands are set out on Page 79; the preferred option which is set out at 6A is to re-designate the site from a Major Employment Location to mixed use. In doing so the Council could then allocate a proportion of the site for housing with the intention of unlocking development of the Knockmore Link Road through developers' contribution by way of Section 76 Planning Agreements. Whilst the exact amount of housing land will be determined at Plan Strategy Stage it has been indicated this will be up to a maximum of 50% of the site.

28. From a perspective of ensuring the construction of the Knockmore Link Road, an enabler to wider development of these lands, Invest NI can understand the Council's wish to permit residential development. We would, however, question whether the figure of 50%, which is cited as being the maximum amount of land to be allocated for residential development, might be at odds with the Council's recognition that existing employment land should be safeguarded as expressed under Key Issue 5; we do recognise that preferred option 5A specifically excluded these lands.

29. We note on Page 78 the range of uses that the Council considers to be appropriate within the site, these are "industrial and business/light industrial/general industrial/storage or distribution, hotel and ancillary leisure facilities, education, healthcare, car showrooms, open space and small scale retail developments".

30. Whilst Invest NI recognises the potential of many of these uses to generate employment it would, however, have concerns that opportunities for businesses falling within Class B (Planning Use Classes Order Northern Ireland 2015) might be constrained, particularly if up to 50% of the site is to be allocated for residential development.

31. It is our view that those businesses operating within the Class B uses represent the best opportunity to grow and develop the Northern Ireland economy through, for example, their greater emphasis on export, innovation and Research & Development.

### Mixed Use Developments

32. Whilst Invest NI fully appreciates the benefits that can be derived from a mixed use zoning, particularly those around sustainability, there are potential dangers that the Council should also be cognisant of. From an industrial/economic point of view these can relate to the generation of industrial traffic and industrial processes/machinery used on site. We would therefore encourage the Council to ensure that in any masterplan for the development of these lands the industrial element(s) remain separate from other uses and preferably severed by different access points.

### 33. Developers' Contributions

As noted at paragraph 24 above, it is the intention of the Council to seek Developers' Contributions towards the development of the Knockmore Link Road. In principle Invest NI can appreciate the application of a "developer pays" principle in respect of private sector developments, such as that which might come forward at Blaris/West Lisburn, where the primary motivation might be the generation of financial benefit for the developer. It would, however, 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.

### Key Issue 7 – Purdysburn Mixed Use Site Major Employment Location

34. As noted on Page 80 the Purdysburn Major Employment Location provides for 85.54 hectares of land zoned for mixed use. The acceptable uses are industrial and business, residential institutions and medical or health services.

35. The preferred option as detailed at 7A on Page 81 is to retain the Purdysburn lands Major Employment Location as a mixed use site. We note that the Council aims to promote the site as a high quality Business Park incorporating Information Communication Technology (ICT) uses, medical/biotechnology uses, Research and Development and facilitating inward investment and local businesses.

36. Mindful of the inclusion of residential institutions as an acceptable use within these lands Invest NI's comments at paragraph 30 around the need to ensure that industrial elements remain separate from other uses/activities are equally applicable here.

37. We would assume that in facilitating inward investment and local businesses, and retaining the status quo, the Council will continue to consider industrial and business uses to be acceptable within these lands. For the successful development of these lands as a high quality Business Park it will be important to ensure it is accessible to a wide range of potential investors who can support economic growth.

#### Key Issue 8 – The Maze Lands Strategic Land Reserve of Regional Importance

38. Page 82 notes that the Maze lands provide approximately 141 hectares of employment land. The existing Development Plan recognises that the site offers potential for major development of regional significance. The Council is considering the possibility of a Simplified Planning Zone at the Maze Lands to encourage economic development and investment.

39. The preferred option as discussed at option 8A on Page 83 is to retain the designation of the Maze Lands as a Strategic Land Reserve of Regional Importance. Future investment areas could include agri-food, life sciences, hi-tech and food & drink.

40. Invest NI welcomes the recognition that these lands offer a significant opportunity for employment. In line with its earlier comments around the Purdysburn MEL the organisation would encourage the Council to ensure that the lands are accessible to a wide range of potential investors who can support economic growth.

41. Given the regional significance of the lands it should also ensure that, in so far as is possible, development opportunities are future proofed. Invest NI would be willing to engage with the Council and stakeholders in respect of wider development plans for the site.

## Key Issue 9 – Facilitating Sustainable Rural Economic Development in the Countryside

42. The POP notes at Page 85 that the existing policy-led approach is to encourage appropriate development in the right places. This means facilitating proposals likely to benefit the rural economy and support rural communities whilst protecting or enhancing rural character and the environment.
43. A proposal for a major or regionally significant economic development would be acceptable where it demonstrates a significant contribution to the regional economy where it could not be accommodated within a settlement. However an edge of town location would be favoured.
44. Alternatively it is suggested that the LDP could consider the provision of certain sites (“Rural Business Development Zones”) for employment uses which due to their size or scale would not be suitable within a settlement. These sites could provide opportunities for start-up/small businesses and an alternative to working from home and could be associated with existing settlements on or close to their edge.
45. Invest NI welcomes 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.
46. Paragraph 5 on Page 85 notes that developments which are incompatible with nearby economic development would not normally be approved. These include new residential developments close to an existing economic use that would likely cause noise, pollution or traffic problems.
47. Invest NI is strongly supportive of this and would furthermore underline the need for the LDP to have in place policy protection akin to that set out within Planning Policy Statement 4 PED 8 and the Strategic Planning Policy Statement which should apply across the Council area.



48. It is our view that policy such as this is as important to the safeguarding of employment land for the future as ensuring that only such uses are permissible on the land. The potential for apparently benign uses to adversely impact, or even inhibit, future economic development is an important consideration and must not be underestimated.

49. Referring back to the Council's preferred option for development at the Purdysburn MEL. Businesses within the identified sectors of agri-food, life sciences, hi-tech and food & drink can be particularly sensitive to external factors such as dust, odour etc. which could lead to issues around incompatibility of uses. Comments at paragraph 45 above regarding the need to have robust planning policy in place are equally applicable in these circumstances.

50. The preferred option is set out at 9A on Page 86 and is to retain the existing policy-led approach to facilitate sustainable economic development opportunities within the countryside. Invest NI has no objection to this approach but would suggest that the designation of areas as Rural Business Development Zones is a matter that the Council should keep under review.

#### Growing our City, Town Centres, Retailing and Offices

51. Page 94 of the Preferred Options Paper sets out objectives and issues linked to Growing Our City, Town Centres, Retailing and Offices. Invest NI notes that the LDP will provide an Office Strategy to identify further opportunities for growth in this sector within the City and town centres.

#### Key Issue 15 – Growing the Night Time Economy

52. It is noted on Page 112 that a vibrant night time economy makes an important contribution to the overall economic growth of an area. A range of activities and mixture of uses in a city or town centre increases their viability and vitality and can help sustain a vibrant night-time economy.

53. The Preferred Option set out at 15A on Page 113 seeks to promote the city and town centres as key locations to grow the office, retail, cultural, leisure and recreational offer to help develop a vibrant shared space and contribute to the growth of the night time economy. Invest NI sees merit in this approach it will, however, key to this will be ensuring that there is an appropriate balance of uses.

54. As a means to boost the economy the Council recognises that buildings which are currently unused have potential to offer new opportunities following regeneration projects. This links to the strategic objective outlined at bullet point 4 on page 94 which seeks “to promote the regeneration and reuse of existing buildings and previously developed land for mixed use development whilst maintaining environmental quality and residential amenity”. There are also links to Key Issue 29 Protecting and Enhancing Built Heritage Assets and Archaeological Remains.

55. Whilst not explicitly stated we would expect that this could potentially include buildings previously used for industrial purposes. We would refer you to our comments at paragraph 63. It would be our assumption that land previously or last used for industrial development/employment will be safeguarded as per Preferred Option 5A on Page 77.

#### Offices

56. The Lisburn City Centre Masterplan 2015 notes that the promotion of business and office space in urban centres is key in establishing thriving and vibrant local and City Centre. The Office Strategy aligned to the Belfast Metropolitan Area Plan permits a limited dispersal of major office development at West Lisburn/Blaris and Purdysburn; proposals in excess of 5000m<sup>2</sup> and 3000m<sup>2</sup> respectively. This is with the proviso that there are no suitable sites in Belfast or Lisburn City Centres and would otherwise result in the loss of significant inward investment.

#### Key Issue 16 – Promoting Office Development Within the City, Town, District and Local Centres

57. It is the view of Invest NI that the availability of suitable office accommodation is suitable office accommodation is an important part of Northern Ireland’s investment proposition.

58. We note from Page 117 that the Council’s does not consider Lisburn City Centre as having a well-developed portfolio of office space. The desire is therefore to promote the development of this sector in order to support sustainable development, assist urban renaissance and provide jobs in local areas. Invest NI would welcome this approach.

59. The preferred option set out at 16A on Page 118 is to promote office development within the city, town, district and local centres. This, it is envisaged, will encourage office uses within Lisburn City Centre as well as Carryduff, Hillsborough and Moira.

60. It is proposed to retain a 400m<sup>2</sup> limit will be retained within the Local and District Centres in order to respect the strategic policy of directing office development to city and town centre locations. Invest NI is supportive of this approach, it is important to ensure the provision of a range of accommodation across the District in order to cater for the varying needs of investors.

#### Key Issue 17 City Centre Development Opportunity Sites

61. The Council notes on Page 119 the existence of a number of Development Opportunity Site within the Lisburn City Centre boundary where new development providing a mix of uses could promote the vitality and viability of the City Centre. Acceptable uses will be identified through key site requirements.

62. The preferred option which is set out at 17A is to identify Development Opportunity Sites within Lisburn City Centre. Invest NI welcomes the identification of such sites as they can provide useful opportunities for private sector intervention and individual company development. We would encourage the Council to ensure a broad spectrum of acceptable uses including those relating to economic development.

63. In the interest of offering/providing a balanced spread of economic opportunities we would also encourage the Council to consider the identification of further Development Opportunity Sites across the district.

#### Key Issue 24 Promoting Active Travel

64. It is noted on Page 159 that the Council proposes to promote new development in urban areas and settlements with access to existing public transport availability or by walking/cycling.

65. The preferred option as set out at 24A states that any new development will only be permitted if it is able to demonstrate that it would have acceptable accessibility to walking, cycling and public transport facilities and provides safe and convenient access for pedestrians.

66. In terms of sustainability Invest NI can see merit in the Council's approach, however, many industrial/business developments tend to occupy edge of town locations which may not be readily/frequently served by public transport. Furthermore, accessibility for walking and cycling, whilst attractive options for those employed within the development, could equally encourage members of the public to traverse the area which could have implications for their safety. Our comments at paragraph 32 concerning mixed use developments are equally valid here.

67. Whilst not opposed to the Council's approach we would urge caution in its application in respect of industrial/business developments.

**Key Issue 29 Protecting and Enhancing Built Heritage Assets and Archaeological Remains**

68. Invest NI welcomes the Council's recognition of the importance of our built heritage and that it can promote economic vitality and growth through ongoing regeneration. The preferred option as set out at 29A is to retain the existing policy-led approach with regards to the protection and enhancement of Built Heritage Assets.

69. Former industrial premises are an important part of our built heritage and within the district there will undoubtedly be those which, with sympathetic restoration, could once again contribute towards our economic growth. We do recognise that there may be instances where such properties may not easily or viably 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>>>>>>