

Local Development Plan 2032
Technical Supplement 5

Economic Development



**Ards and
North Down**
Borough Council

Contents

1.0 INTRODUCTION	4
Purpose of this document	4
2.0 PLANNING AND ECONOMIC DEVELOPMENT	4
3.0 REGIONAL POLICY CONTEXT	5
Programme for Government 2024-2027	5
Draft Programme for Government 2016-2021	6
Draft Programme for Government Outcomes 2021	6
Regional Development Strategy 2035	6
Strategic Planning Policy Statement for Northern Ireland	8
Planning Policy Statements and Supplementary Guidance	9
4.0 LOCAL POLICY CONTEXT	10
The Big Plan for Ards and North Down 2017-2032	10
Ards and North Down Corporate Plan 2024-2028: A Sustainable Borough	11
The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 (Ards and North Down Borough Council)	11
5.0 EXTANT AREA PLANS	12
Draft Belfast Metropolitan Area Plan 2015 (dBMAP)	12
Ards and Down Area Plan 2015 (ADAP)	12
6.0 CROSS BOUNDARY POLICY CONTEXT	13
7.0 PROFILE OF ECONOMIC DEVELOPMENT IN ARDS AND NORTH DOWN	14
8.0 SURVEY WORK AND STUDIES INFORMING THE EVIDENCE BASE FOR ECONOMIC DEVELOPMENT	17
Employment Land Review Report (ELRR) 2019	17
Ards and North Down Industrial and Economic Land Monitor Report (2022)	20
9.0 PREFERRED OPTIONS PAPER	21
10.0 CONSULTEE AND COUNCILLOR ENGAGEMENT	23
Council Engagement	25
Development Management Team	26
Sustainability Appraisal (SA)	27
11.0 DRAFT PLAN STRATEGY APPROACH	27
Strategic Employment Locations	27
Policies for the development of Other Zoned Sites	28
Economic Development in the Countryside	28
Development Incompatible with Economic Development Uses	29

12.0 SOUNDNESS.....29

Appendix A – Strategic Economic Development Map.....31

Appendix B – Relevant Sections of the Planning (Use Classes) Order (Northern Ireland) 2015
.....32

1.0 INTRODUCTION

Purpose of this document

- 1.1 This technical supplement is one of a number of topic-based documents detailing the evidence base used to inform the preparation of the Ards and North Down Local Development Plan (LDP) draft Plan Strategy 2032. This suite of documents should be read alongside the policies contained within the draft Plan Strategy, in order to understand the rationale and justification for each policy.
- 1.2 In May 2019, the Council launched the Preferred Options Paper (POP), the first of 3 public consultation documents which will be issued through the LDP process. The POP outlined the vision and strategic objectives of the plan based upon the baseline information detailed in a suite of position papers. The technical supplements which complement the draft Plan Strategy will build upon the baseline information gathered in the position papers and show how this has been progressed through the LDP process to formulate the draft Plan Strategy.
- 1.3 This technical supplement builds upon and updates the Economic Development Position Paper and, along with the full suite of technical supplements, topic papers and associated documents, sets out the evidence base that has formulated the Economic Development policies in the draft Plan Strategy. Public consultation processes and engagement with Elected Members have also been taken into account. It should be noted that this is based upon the best information available at the time of compiling this position paper. Amendments may be required as new data becomes available or as a result of any changes in policy or guidance.

2.0 PLANNING AND ECONOMIC DEVELOPMENT

- 2.1 Growing a sustainable economy and investing in the future is a key strategic priority of the Northern Ireland Executive. Planning can play a vital role in achieving a vibrant economy by managing development to promote economic growth and deliver local employment and economic prosperity for the Borough. Effective planning also needs to be flexible enough to adapt to the ever-changing needs of business in a highly competitive global market.
- 2.2 In planning terms, and for the purposes of planning policy, economic development relates to those uses defined under Part B of the Planning (Use Classes) Order (Northern Ireland) 2015, which include:

Part B

Industrial and Business Uses

Class B1: Business

Use -

- a) As an office other than a use within class A2;
- b) As a call centre; or
- c) For research and development which can be carried out without detriment to amenity by reason of noise, vibration, smell, smoke, soot, ash, dust or grit.

Class B2: Light Industrial

Use for any industrial process which can be carried out without detriment to amenity by reason of noise, vibration, smell, smoke, soot, ash, dust or grit.

Class B3: General Industrial

Use for carrying out any industrial process other than one falling within class B2.

Class B4: Storage and Distribution

Use for storage or as a distribution centre.

3.0 REGIONAL POLICY CONTEXT

[Programme for Government 2024-2027](#)

- 3.1 The Northern Ireland Executive has agreed upon the Programme for Government (PfG) 2024-2027 'Our Plan: Doing What Matters Most.' The PfG sets out the Executive's priorities for making a difference to people's lives – comprising nine immediate priorities and three long-term missions of people, planet and prosperity, with a cross-cutting commitment to peace. A key aim of the PfG is to grow a sustainable economy and this is reflected through a number of the outcomes and indicators within the PfG framework, including Outcome 12 - 'We have created a place where people want to live, work, visit and invest.' The role that the LDP can play in delivering the PfGs economic, social and environmental outcomes is recognised.

[Draft Programme for Government 2016-2021](#)

- 3.2 The previous draft Programme for Government 2016-2021 was the most up to date expression of the highest level of policy from the Northern Ireland Executive during much of the preparation of the draft Plan Strategy. It set out 14 strategic outcomes, some of which had implications for economic development, particularly 'We prosper through a strong, competitive regionally balanced economy,' 'We have more people working in better jobs,' and 'We have created a place where people want to live, work, visit and invest.'

[Draft Programme for Government Outcomes 2021](#)

- 3.3 The Northern Ireland Executive consulted on a new Programme for Government in 2021 that aimed to bring a new focus to deliver lasting, real and positive change in people's lives, reflecting the themes contained in 'New Decade New Approach'. The draft Framework contained nine Strategic Outcomes which, taken together, set a clear direction of travel for the Northern Ireland Executive and provided a vision for the future of all citizens.

[Regional Development Strategy 2035](#)

- 3.4 The Regional Development Strategy (RDS) provides an overarching strategic planning framework to facilitate and guide future development throughout Northern Ireland. It sets out a policy direction to 'ensure an ample supply of land to facilitate sustainable economic growth.' It advocates that land should be accessible and located to make best use of available services, meaning that the focus will be on larger urban centres and regional gateways, taking advantage of their locations on the Regional Strategic Transport Network.
- 3.5 The RDS directs Development Plans to assess the quality and viability of sites zoned for economic development. A three-stage framework is set out that seeks to enable planning authorities to identify robust and defensible portfolios of both strategic and locally important sites in their development plans as follows:

Table 1: The RDS Employment and Land Evaluation Framework

RDS Employment and Land Evaluation Framework	
Stage 1 Taking Stock of the Existing Situation	<p>An initial assessment of the ‘fitness for purpose’ including the environmental implications of the existing land portfolio.</p> <p>This is principally in order to identify the ‘best’ employment sites to be retained and protected and to identify sites that should clearly be released for other uses.</p>
Stage 2 Understanding Future Requirements	<p>Quantify the amount of employment land required across all the business sectors during the development plan period.</p> <p>This is achieved by assessing both demand and supply elements and assessing how they can be met in aggregate by the existing stock of business premises and by allocated sites.</p> <p>Account should also be taken of existing sites due to relocation or closures. Both short/medium term and strategic provision need to be considered in this process</p>
Stage 3 Identifying a New Portfolio of Sites	<p>Devise qualitative site appraisal criteria to determine which sites meet the occupier or developer needs. Confirm the existing sites to be retained, replaced or released and any gaps in the portfolio.</p> <p>In this allocation, consideration should be given to previously zoned sites and the environmental impact of one site relative to others should be included. The results of Stage 2, together with this site appraisal should provide robust justification for altering allocations for employment land.</p>

3.6 Strategic Framework Guidance (SFG11) points to the promotion of economic development opportunities at Hubs and Newtownards is recognised as a Main

Hub within the Borough. The RDS directs that, by first promoting the potential for economic development at hubs, and clusters of hubs, then new development can capitalise on the opportunity for the concentration of people, goods and existing infrastructure.

- 3.7 It also recognises the importance of sustaining rural communities by facilitating rural industries, businesses and enterprises in appropriate locations. This means not only farming, forestry and fishing but also other industries such as tourism which can provide further jobs and opportunities in rural areas, as long as they are integrated appropriately within a settlement or rural landscape.
- 3.8 In the local context, the RDS notes that many of the population of Bangor commute to Belfast to work and recognises Bangor as an important retail and commercial centre. The RDS further identified Newtownards as 'a vibrant service, commercial and shopping centre, serving the Ards Peninsula and North Down with potential to develop as a 'growth pole' for the clustering of economic development.' As a Main Hub, Newtownards is expected to be the major location for employment, services and a range of cultural and leisure activities.

[Strategic Planning Policy Statement for Northern Ireland](#)

- 3.9 The Strategic Planning Policy Statement (SPPS) was published by the Department of the Environment (DOE) in September 2015. A core planning principle is 'to support sustainable economic growth.' The regional strategic objectives for facilitating economic development through the planning system are to:
- promote sustainable economic development in an environmentally sensitive manner;
 - tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality;
 - sustain a vibrant rural community by supporting rural economic development of an appropriate nature and scale;
 - support the re-use of previously developed economic development sites and buildings where they meet the needs of particular economic sectors;
 - promote mixed-use development and improve integration between transport, economic development and other land uses, including housing; and
 - ensure a high standard of quality and design for new economic development.

- 3.10 The SPPS sets out a hierarchy for economic development meaning that in larger settlements such as cities and towns, planning decisions must, to a large extent, be informed by the provisions made for economic development through the LDP process.
- 3.11 Within villages and small settlements, the LDP will not normally zone land for economic development purposes, as this could inhibit flexibility. However, favourable consideration should be given to an economic development proposal where it is of a design, scale and nature appropriate to the character of the particular settlement and subject to meeting normal planning criteria such as compatibility with nearby residential use.
- 3.12 LDPs should also have in place a system to monitor the take up and loss of land allocated for economic development purposes, as well as ongoing assessment of future requirements and trends to help to identify any shortfalls that may arise or highlight the need to reallocate inappropriate or unmarketable sites for alternative uses. Land previously developed for economic development should be identified in order to allow the return of vacant or underused land to productive use and to create more attractive environment. This would reduce the need for greenfield development and has the potential to assist economic regeneration and physical renewal.
- 3.13 Opportunities for mixed use development should also be identified and include economic development uses, where this would create synergy and underpin the economic viability of the development as a whole. Key Site Requirements in the LDP should indicate the types of economic development that will be acceptable and major mixed used sites should be directed to sustainable locations. Such locations should be served by public transport, have adequate infrastructure and be capable of integration within the surrounding area in terms of land use and design.
- 3.14 LDPs should also normally contain a number of supporting actions that will ultimately deliver sustainable and high quality development – this includes Key Site Requirements to ensure that developers provide necessary infrastructure such as road access, access for pedestrians and cyclists, water supply, sewerage and land drainage. The Plan may also provide guidance in terms of key design, layout and landscaping requirements.

[Planning Policy Statements and Supplementary Guidance](#)

- 3.15 Planning Policy Statement 4, published in November 2010, sets out a range of planning policies for economic development uses and indicates how growth associated with such uses can be accommodated and promoted in development plans. It seeks to facilitate and accommodate economic growth

in ways compatible with social and environmental objectives and sustainable development. The policies identify opportunities and define criteria for economic development in settlement and in the countryside. The PPS also contains a policy for the retention of zoned land for economic development as well as a policy to safeguard against development that is incompatible with established or approved economic development uses.

- 3.16 Planning Policy Statement 21, published in June 2010 and sets out the planning policies for development in the countryside, defined as land lying outside of settlement limits as designated in development plans. This PPS seeks to manage development in the countryside in a manner that strikes a balance between the need to protect the countryside from unnecessary or inappropriate development, whilst supporting rural communities in regard to sustainable economic development. One of the objectives of PPS21 is to facilitate development necessary to achieve a sustainable rural economy, including appropriate farm diversification and other economic activity.

4.0 LOCAL POLICY CONTEXT

[The Big Plan for Ards and North Down 2017-2032](#)

- 4.1 The Big Plan is the Community Plan providing an overarching framework setting out a shared vision and ambition that Ards and North Down's Strategic Community Planning Partnership has agreed to work towards over the next 15 years. The vision of the plan is that Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to be.
- 4.2 The overarching, cross-cutting ambition of The Big Plan is 'To have empowered, resilient individuals and communities, to reduce inequalities; to promote good relations and sustainability; and to improve the accessibility of all public services.'
- 4.3 The Big Plan contains five outcomes that it hopes will reflect the position of the borough by 2032. The following outcome is of relevance to this technical supplement:

- **Outcome 4 – All people in Ards and North Down benefit from a prosperous and inclusive economy**

The creation of jobs and thriving businesses will be supported by the economic policy of the LDP which will zone new employment land and protect existing employment land from loss to other uses or encroachment by incompatible uses. The farm diversification policy is also aimed at supporting

those in the agricultural sector to pursue alternative countryside activities that are complementary to farming.

- 4.4 The Local Government Act 2014 through an amendment to Section 8 of the Planning Act (Northern Ireland) 2011 introduced a statutory requirement that the preparation of the LDP must take account of the Community Plan. The Big Plan will work in tandem with the LDP which provides the spatial framework to achieve the shared vision for the Borough.

[Ards and North Down Corporate Plan 2024-2028: A Sustainable Borough](#)

- 4.5 The core of this new Corporate Plan is the vision of a sustainable Borough where environmental, social and economic wellbeing are interdependent. One of the key priorities of the Corporate Plan is 'Increased Economic Growth by attracting more businesses and jobs.' In order to achieve this goal, the Council aims to focus investment on activities that increase economic growth and lists numerous indirect benefits to the Borough, including improved health and happiness, higher living standards, reduction of inequalities and greater economic security for all. The economic development policies within the LDP tie in directly with Outcome Three of the Corporate Plan 'We have a thriving and sustainable economy,' by zoning and safeguarding land for economic development purposes and ensuring that there is an adequate supply of this land in the most accessible and sustainable locations.

[The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 \(Ards and North Down Borough Council\)](#)

- 4.6 The Integrated Strategy presents a vision for the pursuit of prosperity in the Borough of Ards and North Down. One of the main targets of the Strategy is to grow the number of jobs in the Borough by 7500 by 2030. The priority sectors (ICT, professional/technical, finance and administration) are to be supported by a number of actions, including marketing and communications, start-up support, infrastructure development and the development of flexible workspaces. It is also intended to support existing sectors of strength, such as manufacturing and agri-food and to enhance revenue generated from tourism, especially in the spheres of arts and accommodation/food.

5.0 EXTANT AREA PLANS

- 5.1 It should be noted that BMAP was adopted in September 2014 but was subsequently quashed as a result of a judgment in the Court of Appeal delivered on 18 May 2017. As a consequence of this, the North Down and Ards Area Plan 1984-1995, the Belfast Urban Area Plan, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area with draft BMAP remaining a material consideration. These plans remain extant until replaced by the new Local Development Plan (LDP) for the Borough. The existing plans are an important consideration in the LDP process, as they provide a starting point for the review of our spatial planning options.

[Draft Belfast Metropolitan Area Plan 2015 \(dBMAP\)](#)

- 5.2 Volume 7 of draft BMAP 2015 sets out policies for (former) North Down District. These policies have been developed in the context of the Plan Strategy and Framework contained in Volume 1 of the Plan and are in general conformity with the RDS.
- 5.3 The draft BMAP Employment Strategy seeks to sustain balanced economic growth and job creation by promoting city and town centres, providing a generous and continuous supply of land and promoting a balanced portfolio of sites throughout the plan area.
- 5.4 In terms of cross-boundary matters, cognisance should be given to the existing employment/industry zoning at Belfast Harbour, which is located on lands that are in close proximity to the boundary with North Down and adjacent to Belfast City Airport.

[Ards and Down Area Plan 2015 \(ADAP\)](#)

- 5.5 The ADAP was adopted in 2009 and relates to the legacy Ards Borough Council area. The Plan objectives include the promotion of Newtownards as a 'main town within Northern Ireland' and strengthening the role as the principal administrative, trade, employment and residential centre within the plan area, as well as the creation of employment.
- 5.6 The Industry section of the Plan sets out two policies, one dealing with the existing industrial sites and the second looking at proposed industrial lands within the Ards Borough. The policy states that existing sites should be safeguarded against inappropriate development and that favourable consideration will be given to development proposals on land zoned for industry.

6.0 CROSS BOUNDARY POLICY CONTEXT

- 6.1 Throughout the LDP process, it has been important to take the position of other councils, and particularly our neighbouring councils, into account. Ards and North Down Borough is bounded by Belfast City, Lisburn and Castlereagh City and Newry, Mourne and Down Council areas, each of which is at different stages in the formulation of their own LDP.

Table 2: Neighbouring Councils' position in relation to Economic Development

Council	Document
Belfast City Council (BCC)	<p>The BCC draft Plan Strategy was formally adopted on 2 May 2023.</p> <p>BCC LDP policy EC3 aims to concentrate light industry, general industry and storage and distribution in designated Major Employment Locations and Strategic Employment Locations. Zoned employment areas will be retained in employment use and will be the focus of economic regeneration. There is also a dedicated policy EC6 for office development, which aims to focus larger schemes within the city centre boundary.</p>
Lisburn Castlereagh City Council (LCCC)	<p>Lisburn and Castlereagh City Council adopted its Local Development Plan 2032 Plan Strategy on 26th September 2023.</p> <p>LCCC draft plan strategy looks to support B1a, b and c uses in designated town centres, district and local centres or business parks. B2, B3 and B4 uses are directed towards zoned employment lands.</p> <p>Part 1 of the Plan Strategy, which relates to Strategic Policies, designates land at West Lisburn/Blaris and Purdysburn/Knockbracken as Strategic Mixed Use sites, with a number of requirements to be included in masterplans for each site.</p>

<p>Newry, Mourne and Down District Council (NM and D)</p>	<p>The NM&D draft Plan Strategy was published on 27th June 2025. Policy ED1 directs Class B1a, b and c uses to city and town centres unless there are no appropriate sites available. Class B2, B3 and B4 uses are to be located on zoned employment land identified in the LDP. Economic development proposals in villages and small settlements will be assessed on a case by case basis.</p> <p>Policies ED2 and ED3 allow for the redevelopment or expansion of economic development uses in the countryside. Policy ED4 permits major developments provided they make a significant contribution to the regional economy. Farm diversification and agricultural/forestry development are also addressed via ED6 and ED7.</p>
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- 6.2 The Council has engaged with each neighbouring Council's POP consultation, as well as the dPS consultations of Belfast City Council and Lisburn and Castlereagh City Council.
- 6.3 Professional officers from the LDP team also took part in a number of cross council forums including the Metropolitan Spatial Working Group and the Development Plan Working Group. The Council has also been actively participating in the DfI/DAERA jointly hosted Coastal Forum, to ensure that all aspects of coastal erosion relevant to our district are evidenced as best as possible.
- 6.4 Most recently, online engagement on the Council's draft Plan Strategy was held with the three neighbouring councils in March 2025. This included discussion around the proposed growth strategy and employment land allocation, alongside operational policies. This included the identification of specific cross-boundary issues.

7.0 PROFILE OF ECONOMIC DEVELOPMENT IN ARDS AND NORTH DOWN

- 7.1 Economic activity, employment levels and income are indicators of the economic well-being of a population. This section provides an overview of the

employment and economic base of the Ards and North Down Council area within the context of the Northern Ireland economy. The Department for Economy Economic Commentary Report of Winter 2023 states that, whilst the local economy had shown signs of recovery earlier in the year, most recent indicators point to a contraction in economic output and a potential softening of the labour market.

- 7.2 The Borough has a population of 164,223 (NISRA, June 2022), which represents 8.6% of the total Northern Ireland population. The working age population (16-64 years) in 2022 was 97,400. The current (June 2022) proportion of those aged over 65 is 22.6%, which equates to one in five people.
- 7.3 The location of the Borough, close to Belfast, is significant as Belfast is the main driver of the Northern Ireland economy, with the city region accounting for 18% of Northern Ireland's population. Almost three in ten of Ards and North Down employee jobs are in Belfast City Council Area, accounting for 29% of the NI total. The legacy North Down area of the Borough forms part of the wider Belfast Metropolitan area and has good transport links to the capital city by both rail and road.
- 7.4 Employment is generally expressed in terms of three sectors – primary, secondary and tertiary. Primary sector includes agriculture, fishing, forestry and the mining and quarrying of natural resources. The secondary sector is related to manufacturing and the processing of natural resources. The tertiary sector refers to the service sector and includes retailing, hospitality, transportation and distribution. Similar to trends in the UK overall, manufacturing employment in NI is expected to continue declining, with a shift towards more exportable service sectors such as administrative and professional services, software and ICT, scientific/technical and retail, to drive job creation.
- 7.5 As of 2023, there are 4815 VAT/PAYE registered businesses in Ards and North Down (source: NISRA.) This accounts for 6.1% of the NI total. The key businesses in the Borough include agriculture, construction, professional/scientific/technical and retail. According to the 2023 Inter Departmental Business Register, the vast majority of businesses in the Borough are micro - that is 1-9 employees (71%).
- 7.6 Northern Ireland is a global leader in many manufacturing sectors including aerospace technology and materials handling. This Borough has a portfolio of top performing companies across these sectors. These include Munster Simms Engineering ('Whale Pumps'), specialists in water pumps, Denroy

Plastics – designer and manufacturer of plastic moulded components (such as the Denman hairbrush and hair care products); and Magellan Aerospace, which supplies machined components, sub-assemblies and logistics to the global aerospace and defence industry.

- 7.7 The agri-food sector is also well represented in the Borough by Pritchitts, part of the Lakeland Dairy Group which produces powdered milk products, Mash Direct and Willowbrook Farm which produce fresh and ready-made vegetable products, and Clandeboye Estate which creates hand crafted yogurts. Echlinville and Copeland Distilleries distils a gin product which is stocked on a UK-wide scale in major supermarkets.
- 7.8 Life and Health Science is also recognised as a strategically important growth sector in the NI economy. TG Eakin Limited, a medical device manufacturer, dedicated to the production of high-quality skin products for use in stoma and wound care, is located at Ballystockart Road Comber and received planning permission to extend its premises in 2008, 2011 and 2023.
- 7.9 Rural-based enterprise is clearly important to the Borough, as is fishing. Fishing has been a major industry in the area for many years with local communities such as Portavogie remaining at the centre of the fishing trade today.
- 7.10 In addition to the more traditional industries and businesses, Holywood has recently become established as the base for a cluster of creative innovators specialising in production and postproduction for television, film, animation, design and games development. Locally grown businesses such as Waddell Media, Flickerpix and Yellowmoon have played a vital role in the growth of Northern Ireland's screen sector, working with clients including HBO, the Discovery Channel, Netflix, BBC and RTE. The combination of; the proximity to nearby developments such as Belfast Harbour Studios, Titanic Studios and the new Studio Ulster virtual production studio within established Council partnership links with South Eastern Regional College (SERC), NI Screen and the local community, means that Holywood is perfectly placed to harness the future growth of business and talent in this rapidly expanding sector.
- 7.11 A recent report into office space and the available facilities highlighted that within Holywood, there was a significant demand for quality workspace to meet the requirements of these high-growth firms. Under the Belfast Region City Deal (BRCD) 'Building our Digital Innovation' funding pillar, the Council has secured funding to develop a centre of excellence for the creative and technology sectors in Holywood, specialising in film, TV and screen industries. Whilst at an embryonic pre-planning stage, it is envisaged that the

building will offer high quality and digitally advanced co-working space and will provide a platform for collaboration and networking within these sectors.

- 7.12 BRCD funding has also been secured for the Bangor Waterfront Redevelopment Scheme and two key strands of this are of relevance to the economic development of the Borough. Pickie Park is already a popular tourist attraction which generates significant revenue for the Borough and the redevelopment scheme aims to enhance this through the creation of new attractions for both children and young adults, incorporated within feature landscaping. Bangor Marina is ranked as the largest 5 gold anchor accredited marina development in Northern Ireland, and its planned redesign will allow an increase in the number of seafaring visitors to Bangor. Dropped boardwalks, seating and viewing areas, along with food and beverage offerings will open up the space and make it easier for people to enjoy the sea views.
- 7.13 A final economic development project of note is the Artemis zero emissions ferry, designed by maritime engineering firm Artemis Technologies and being developed in Belfast. The pilot scheme is scheduled to run from Bangor to Belfast in late 2025.

8.0 SURVEY WORK AND STUDIES INFORMING THE EVIDENCE BASE FOR ECONOMIC DEVELOPMENT

[Employment Land Review Report \(ELRR\) 2019](#)

- 8.1 The Employment Land Review was carried out on behalf of the Council in 2019 by Gravis Planning. This provides an assessment of the current employment land in the Borough and considers how future needs for new and/or additional employment land could be delivered through the LDP process. The ELRR follows the Employment Land Evaluation Framework set out in the RDS and shown in Table 1 of this Paper. It considers the current provision of zoned employment/industrial land within the Borough and undertakes a qualitative and quantitative assessment of these lands in order to establish their suitability to assist in providing an ample supply of land for economic use over the lifetime of the emerging LDP. Consideration is also given to potential brownfield sites within the main settlements, to assess whether these lands are suitable to accommodate economic development in the future.
- 8.2 The extant Ards and Down Plan (ADAP 2015) and the draft Belfast Metropolitan Area Plan (BMAP 2015) designated over 200 hectares of land for employment and industrial use in the Borough, although the vast majority of

this quantum related to existing industrial areas such as Kiltonga, Balloo and Greenway Industrial Estates. Bangor and Newtownards were the Borough's strategic locations for economic development land, containing the majority of the zonings and also being the focus for Invest NI's serviced sites. Further small-scale zonings were located in Comber and Donaghadee. A builder's merchants in Ballywalter was designated as an Industrial Policy Area (IPA) in recognition of its role as a key employer in the village. The aforementioned studies revealed that out of 203.23ha zoned as either existing or proposed employment land, 62.28ha remains undeveloped (nearly 31%).

8.3 The Council's Integrated Tourism, Regeneration and Economic Development Strategy sets out the growth aspirations for the Borough up until 2030. Its growth rates have been applied and extrapolated to 2030 by economists Baker Tilly Mooney Moore, giving a baseline scenario of 4500 new jobs by 2030 and an ambitious 'strategy success' scenario of 7500 jobs by the same date.

8.4 The ELRR details how the additional jobs have been apportioned to certain Use Classes based upon existing NISRA figures for each sector in Ards and North Down. The amount of floorspace required for different job types was taken from the Home and Communities Agency Employment Density Guidance. The resulting calculation produced a quantum of floorspace that would be required for both the baseline and strategy success scenarios, and this could then be converted into a number of hectares. The findings were as follows:

Baseline Scenario (4500 jobs) – 126, 000 sq. metres – 12.6 ha

Strategy Success Scenario – (7500 jobs) – 205, 000 sq. metres – 20.5 ha

8.5 In both of the above cases, it has been suggested that the figures are slightly increased to allow for ancillary elements such as car parking and plant and yard areas, rounding up at 15ha and 25ha respectively. This suggests that there is adequate existing undeveloped zoned land available to accommodate both the baseline and strategy success scenarios referenced in the Council's Integrated Strategy.

8.6 The ELRR however recommends that this oversupply of zoned lands can be justified for the following reasons:

- It would allow for unexpected growth over the Plan period and ensures there is sufficient choice to accommodate changing market demand;

- It ensures flexibility of choice across a number of locations and for various types of sectoral growth between both Bangor and Newtownards;
- It ensures that an adequate supply and choice of economic development land exists should future Local Development Plans be delayed; and
- It allows for the non-development of Invest NI lands over the Plan period should no development take place on these lands due to restrictive Invest NI criteria.

8.7 A number of recommendations were made based upon the report findings:

- Projections suggest that there is no need to zone additional lands for economic development purposes in the LDP;
- Certain existing employment zonings in the main settlements should be retained as economic development land in the LDP;
- Strategic Employment Locations (SELs) should be considered for Balloo Industrial Estate in Bangor and Jubilee Road Industrial Estate in Newtownards, to protect these areas from inappropriate development and growth;
- Future provision to accommodate economic development over the lifetime of the LDP should be directed towards existing spare capacity on zoned lands in Bangor and Newtownards;
- Analysis suggests that existing zoned lands are the most appropriate locations. However, other potential alternative brownfield sites were considered and one site at 56a Balloo Road (to the east of Balloo Industrial Estate) has the potential to be used for economic development purposes, should the need arise; and
- There is potential for additional sites to come forward during the LDP process. It is recommended that any site proposed for economic development is scored against an agreed matrix.

8.8 In terms of policy for economic development in the Borough, the following recommendations were made:

- Policy should be prepared that protects existing zoned economic development land and SELs from inappropriate development;
- Policy should be prepared that encourages economic development within zones that have spare capacity to accommodate such development in Newtownards and Bangor;
- The redevelopment for alternative uses of retained economic development land should only be permitted in exceptional circumstances and subject to criteria similar that contained in PPS4; and
- Bespoke policy should be prepared that allows modest expansion of rural enterprises and existing economic development uses within smaller

settlements, without adversely impacting upon the character of the rural area.

8.9 The full ELRR accompanies this document and is labelled 5A.

[Ards and North Down Industrial and Economic Land Monitor Report \(2022\)](#)

- 8.10 The Ards and North Down Industrial and Economic Development Land Monitor Report was prepared by the LDP team with an aim to identify the amount and the use classes of developed industrial and economic development land and the supply of undeveloped land at a given date, as well as monitoring the changes thereafter on a periodic basis. The initial survey established a baseline which can be updated in the following years.
- 8.11 All sites within the 5 main settlements of Bangor, Newtownards, Comber, Holywood and Donaghadee which lie within land zoned as either proposed or existing economic development use within an existing statutory area plan were monitored. In addition, other unzoned sites that are currently used for economic development/industrial purposes with a site area of greater than 0.5 hectares, were also included in the monitor. Some of these sites included sui generis uses such as car showrooms, scrapyards and waste management facilities.
- 8.12 The monitor was carried out by LDP staff using a combination of fieldwork and desktop studies, including the use of LPS data and GIS. For each monitored site, the study established:
- the type of land (zoned or unzoned);
 - site area;
 - amount of land developed, under construction or undeveloped;
 - type of business use on site (according to the Planning (Use Classes) Order 2015 – see appendix 1 for further details);
 - floorspace and site area used (per business use class); and
 - current development status.
- 8.13 Lands outside of the five previously listed settlements were not monitored, which is reflective of the more flexible approach of the SPPS to not formally zone land for economic development purposes within villages and small settlements.
- 8.14 The monitor made the following observations:

- Across the Borough a total of 203ha of zoned land was surveyed and an additional 35.65ha were identified as being unzoned but being industrial in character;
- 93% of the existing zoned lands have been developed, although there are a number of sites in both Bangor and Newtownards that have not been developed at all, such as BR06 in Bangor and NS28, NS29 and NS32 in Newtownards;
- The predominant use class on zoned industrial/economic development land in the Borough is B3 General Industry, accounting for 24% of the total and this is followed by sui generis uses at 22%;
- Combined, all of the traditional industrial use classes i.e. Light Industry, General Industry and Storage and Distribution account for 46% of the total;
- Approximately 2% of industrial land has been lost to Class A uses (Shops, Financial, Professional and other services) that would more appropriately be located in a town centre;
- In addition, 12% of zoned industrial land has been lost to Class C1 (residential development) – this includes Weavers Grange Newtownards, Hadlow Donaghadee, Newtown Green, Comber and Faulkner Road, Bangor; and
- Across the Borough's zoned industrial sites, there is a 7% vacancy rate, equating to a 6% floorspace vacancy.

8.15 The full Employment and Economic Land Monitor may be found in the papers accompanying this document, numbered 5B.

8.16 The Council has carried out a review of the ELRR 2019 and the Industrial and Economic Land Monitor 2022, with a complementary update of the Employment Land requirements up until the end of the Plan Period (completed by Jettora Consulting). This can be found in supplementary papers 5C and 5D.

9.0 PREFERRED OPTIONS PAPER

9.1 The Council's Preferred Options Paper, (POP) published in 2019 was the first formal stage in the preparation of the LDP for the Borough. It was designed to promote debate in relation to key strategic planning issues arising in the area. The POP identified 42 key planning issues and examined options for addressing these issues. In each case, a preferred option was highlighted and the rationale for selection of this option was given.

- 9.2 The POP also includes a review of the existing operational planning policies, largely contained within the suite of Planning Policy Statements. This review stimulated public debate on whether the existing policies are still suitable or whether a different approach would be more appropriate to meet local circumstances.
- 9.3 Following a minor revision to the online version of the POP, the 12 week consultation period was relaunched and therefore the total consultation period from the official launch was 19 weeks.

POP Representations

- 9.4 **Key Issue 26 - Economic Development within Settlements**
The preferred option presented in response to this issue was to 'evaluate existing zonings for economic/employment land and to identify new sites to meet local employment and economic development needs.' This received a mixed response from the 17 respondents. Many agreed that existing zonings must be evaluated as some are in the wrong place or appear undeliverable, and that land allocations should be reviewed periodically on a site-specific basis. In terms of the identification of new sites, there should be a strong preference for development on previously developed brownfield sites, close to existing development, reducing the distance that employees have to commute to.
- 9.5 Other respondents did not support this approach – stating that there is sufficient land already available for economic development needs and the slow uptake means there will be enough to last until the end of the plan period.
- 9.6 **Key Issue 27 - Business Start-Ups and Flexible co-working Spaces**
Preferred option 27a was to 'identify specific sites within economic/employment zonings suitable for business start-ups and flexible co-working spaces.' This approach was widely supported, with 68% of respondents in agreement that this was a good idea. Some commented that future economic growth in the area will be driven by small businesses, high-tech and start-ups and this highlights the importance of making appropriate provision for this in the LDP. Suggested possible sites included vacant ground floor retail units and 'over the shop,' helping to reduce the level of vacancy and capitalise upon accessible town centre locations.
- 9.7 **Key Issue 28 – Rural Economy**

Option 28a 'Support and facilitate rural economic development of an appropriate nature and scale that contributes to a sustainable rural economy and supports rural communities' was preferred option with respect to this issue. Of those that responded to the POP consultation, 79.17% agreed with this approach.

9.8 Key Issue 29 – Class B1 Business Uses

Preferred option 29a was to 'permit B1 business uses in town centres and other suitable locations that may be specified in the LDP such as certain district centres and economic/employment zonings.' The public response to this was positive, with 72% of respondents in agreement that it was the correct approach. It was commented that it could help revitalise town centres, encouraging a 'living over the shop' mentality. Some negative views were expressed also, citing that business use should be restricted to town centres only to avoid division and dilution of the business areas.

9.9 Key Issue 30 – Safeguarding Existing Employment Land

Option 30a was to 'safeguard against the loss of economic/employment land but permit alternative employment uses which fall outside of Part B of the Planning (Use Classes) Order (NI) 2015 within economic development zonings, where they are compatible with existing uses in the area.' This was the preferred option and 51.72% of the public agreed with this approach. They agreed that existing employment land must be protected to avoid it being lost to unfettered and unacceptable uses. Any proposed alternative sui generis use would need to be complementary to existing land uses so that there are no compatibility issues or harm to established businesses.

9.10 Some non-supportive responses received mentioned that there may be cases where the benefits to the community may outweigh the loss of employment land e.g. social housing and community facilities. It was also noted that housing can be an effective driver for employment creation, particularly in town centres.

9.11 For further details on the POP consultation, please see the Preferred Options Consultation Report, dated November 2024.

10.0 CONSULTEE AND COUNCILLOR ENGAGEMENT

10.1 In order to meet the requirements of the Planning Act relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the Department, and other relevant government strategies and

plans; Council has engaged with key consultees representing relevant central government departments and agencies.

Consultee responses

Department for Infrastructure (Dfi)

- 10.2 The Department supports the pragmatic approach to de-zone land if required. Identification of sites in line with preferred option 27a will encourage entrepreneurship within the Borough, in line with Council strategies. In terms of the rural area, the Councils preferred approach aligns with regional strategic policy by ensuring that economic development in the countryside will benefit the rural economy and support rural communities. However limited information is provided at this stage as to how this will be achieved.
- 10.3 In terms of the location of Class B1 uses in town centres and other suitable locations, as advocated by preferred option 29a, Dfi advises that there should be a robust evidence base for alternatives outside town centres. Council should ensure that the policy for locating B1 business uses is consistent with its other policies relating to economy, town centres and retail development.
- 10.4 In terms of the safeguarding of employment land, Dfi notes that there may be compatibility issues with respect to 'alternative uses' and the policy provisions of the SPPS. The Council should therefore ensure that factors such as accessibility, availability of adequate infrastructure environmental impacts and the specialised needs of certain industries are taken into account.

Invest NI (INI)

- 10.5 INI have stated that they would not expect to see a reduction of overall supply of employment land throughout the district as part of any re-zoning exercise. INI also welcomes the identification of specific sites economic/employment zonings suitable for business start-ups and flexible co-working spaces.
- 10.6 INI is also supportive of the need for making provision for economic development in the countryside. Many businesses in the rural area have been created in response to a particular local need and it is therefore important that they are afforded some opportunity to develop and grow at that locale. The cost implications of moving a small rural business to a larger settlement can be prohibitive.
- 10.7 INI welcomes the onus being placed upon applicants to demonstrate compatibility with other business uses. However, if these applications are successful, they could potentially lessen the attractiveness of such land to

other business uses, particularly those requiring a contaminant free environment.

DFI Rivers

- 10.8 Economic development zonings should not be considered in areas known to be at risk from flooding.

NI Housing Executive (NIHE)

- 10.9 The Housing Executive supports the Preferred Options; we believe that the designation of a plentiful supply of employment land can support business development and job growth, leading to sustainable communities. The Housing Executive supports locations within in the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car.

Department for Economy (DfE) – Minerals and Petroleum Branch

- 10.10 The availability of the Sherwood Sandstone aquifer within the council area should form a key consideration for the zoning of employment land. Three of the top six performing businesses in the Borough all rely upon water supplies from the Sherwood Sandstone group. Without this provision these companies would struggle to maintain production. In an effort to attract businesses into the Borough, zoning areas that can access this resource would be a prudent step and could enhance the prospect of attracting inward investment.

Council Engagement

- 10.11 Representatives from relevant Council departments have also been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives. Officers from the LDP team have taken part in a series of Community Plan Thematic Group meetings and engagement events. Furthermore, members of the Community Plan team have also attended LDP workshops and sustainability appraisal meetings.
- 10.12 The LDP team has engaged with the Economic Development Department of the Council to ensure there is alignment between the LDP policies for economic development and wider council strategies to support existing and new business in the area.
- 10.13 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Department for Infrastructure (DfI). Accordingly, Elected Members have also been engaged in the development of the draft Plan Strategy, to ensure that the document is generally aligned with the Council's strategic priorities. This engagement was facilitated through two

council workshops. The first of these took place on 20 September 2017 and provided an introduction to the topic for members. The second workshop was on 18 February 2020 and focussed on policy for economic development. Background papers were circulated to all members prior to these events.

- 10.14 Members were largely positive regarding the suggested policy wording for Economic Development. They were keen on a flexible approach in order to ensure that start-ups and small businesses would be supported in this time of economic uncertainty and recognised the benefits of clustering businesses around existing infrastructure. It was recognised that there are some businesses such as agri-food which are suited to the rural area and their growth should not be hindered. However, a balance needs to be struck between growth and protecting local character.
- 10.15 Members expressed concern at the loss of industrial land to housing as industrial zonings can be viewed as a blight by some landowners. However, others did not want the council to turn away commercial or retail development on this basis, highlighting that the manufacturing era has passed, and new employers do not have the same level of land requirement as they previously had. A flexible approach is therefore required rather than leaving land vacant.
- 10.16 With regard to the rural area, members expressed the need to support the rural economy and tourism, as long as these developments do not adversely impact rural character and provided there is adequate infrastructure to serve them. The reuse of existing buildings is to be encouraged.
- 10.17 An initial draft of the Plan Strategy, which included policies for economic development, was presented in confidence to full Council in September 2022. It was agreed in principle by Members. Final approval for the draft Plan Strategy policies was secured at a Special Planning Committee meeting held on 20 January 2025 and ratified at the full Council meeting on 29 January 2025.

[Development Management Team](#)

- 10.18 The members of the Development Management planning team commented that the existing economic development policies were not especially problematic in terms of their application although there are some commonly identified issues. These include potential loss of zoned employment land for leisure and showroom-style retail uses and also that long term vacancy of land and/or buildings is often put forward as a justification to set aside PPS4 policies and allow the construction of housing on employment land. Another

issue is a failure to appreciate that employment has largely gone beyond the manufacturing/factories era, and includes many businesses that have a much smaller floorspace requirement e.g. offices, research and development and I.T. The DM team highlighted that there is a desire for craft-based businesses, tourism and the sensitive re-use of buildings in the Borough and the economic development policy should adopt a flexible approach to demonstrate that the Borough is open for business.

Sustainability Appraisal (SA)

- 10.19 The formal Sustainability Appraisal process was undertaken by the LDP team and Shared Environmental Services (SES) in March and April 2024. The Councils preferred policies and proposals were appraised against reasonable alternatives. The process proved useful in further refining policies in relation to sustainability objectives.
- 10.20 The SA process specifically influenced the Economic Development policies for Agricultural and Forestry Development and Farm Diversification. Paragraphs were added to the Justification and Amplification of policy ED 9 and referenced in policy ED 10 discussing the impacts of ammonia pollution to air, land and water as a result of intensified cultivation or animal husbandry. The Justification and Amplification highlighted the potential need for an air quality assessment, relevant planning conditions and consultations to be carried out with the relevant authorities with respect to this issue. An additional criterion was also added to the policy referring to 'no unacceptable adverse impact upon air, soil and water quality as a result of the development.'

11.0 DRAFT PLAN STRATEGY APPROACH

- 11.1 The fundamental approach of the draft Plan Strategy is to support the aims and objectives of the RDS and the SPPS by facilitating the economic development needs of the region in ways that are consistent with the protection of the environment and the principles of sustainable development.
- 11.2 The draft plan strategy has been informed by the POP responses and all of the other methods of engagement that are described above. The following is a summary of the policy amendments and additions that are being put forward in consideration of all of the evidence gathered to date.

Strategic Employment Locations

- 11.3 A recommendation made by the ELRR was to designate Balloo Industrial Estate (Zoning BR07 in Draft BMAP) and Jubilee Industrial Estate (Zoning

NS33 in ADAP) as Strategic Employment Locations (SELs) in recognition of their existing and future economic function.

- 11.4 SELs can be defined as the most significant employment sites within a Plan area – both in terms of their physical size and the level of business and industry that they support. In turn, this translates to the number of jobs they provide and the number that they could potentially generate in the future. They should be located close to a large labour pool, with appropriate service infrastructure and accessibility. Once identified as SELs, such sites must then be protected from inappropriate incremental development that would undermine their key economic function and viability. This would be done via strategic and operational planning policy, implemented through the LDP process.
- 11.5 Policy ED 1 contains the operational planning policy relating to SELs. The policy states that proposals that fall outside use classes B1(b), B1(c), B2, B3 and B4 will not normally be acceptable in SELs, subject to some limited clear exceptions. In all cases, the onus will be upon the applicant to demonstrate that the development is of a scale, nature and form appropriate to the surrounding area and that any approval of non-business use in the SEL will not result in diminution of the industrial/employment resource in the vicinity. A map that indicates the approximate location of the SELs in the Borough can be found at Appendix A.

[Policies for the development of Other Zoned Sites](#)

- 11.6 Policy ED2 deals with all zoned sites within the principal settlements that are not designated as SELs. In these cases, the focus will still be upon delivering Class B1(b) to B4 uses. In exceptional cases, mixed use schemes may be acceptable, subject to the applicant being able to demonstrate that the proposal will bring substantial community, environmental or economic benefits.

[Economic Development in the Countryside](#)

- 11.7 These policies aim to make provision for appropriate forms of economic development in the countryside and the evidence informing this policy is largely derived from the regional direction, set out in the RDS, SPPS, PPS4 and PPS21. There are specific policies for major and minor projects and for the expansion or redevelopment of an established economic development use. The policies for farm and forestry diversification and developments are also contained within the suite of economic development section of the draft plan strategy.

Development Incompatible with Economic Development Uses

- 11.8 The draft Plan Strategy contains specific policy (Policy ED9) to ensure that existing/operating or approved economic development uses will not be jeopardised by incompatible development. Examples of this would include industrial operations that generate fumes, dust and dirt and would therefore be incompatible with enterprises requiring a clean and contaminant free environment. In other cases, incompatibility could arise as a result of a proposed new residential development in close proximity to an existing economic development use that would be likely to cause disturbance through noise, pollution or traffic disturbance.
- 11.9 The evidence informing this policy is largely derived from the regional direction set out in the RDS, SPPS, PPS4 and PPS21. Where it is clear that a proposal for a new or expanded economic development use would prejudice the operation of an established or approved economic development use, it will normally be appropriate to refuse the application. All reasonable means of mitigation should be explored by the developer and the established enterprise prior to the submission of the planning application.

12.0 SOUNDNESS

- 12.1 The LDP has been prepared to meet the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to economic development subject policies and other relevant policies in the document is regarded as sound, as it is considered to have met the various tests of soundness as summarised below:

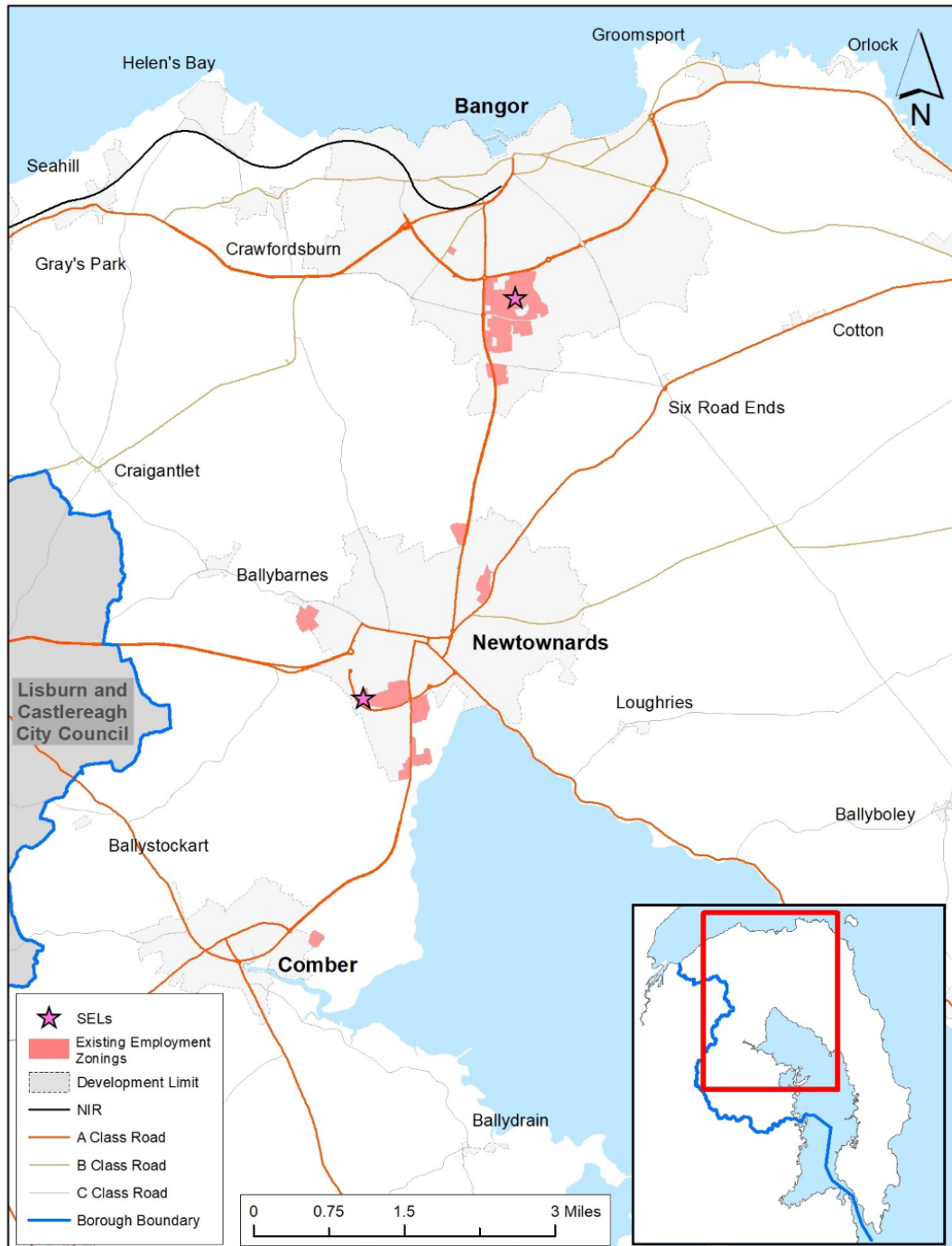
Table 3: Consideration of Soundness

Procedural Tests	
P2	The economic development policies have evolved from the POP, POP consultation Report and Consultee responses, Development Management and Councillor Engagement as described in earlier sections of this document.
P3	The economic development policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	

C1	The economic development policies have taken account of the RDS in particular SFG 11.
C2	The economic development policies have taken account of our Community Plan, particularly outcomes 4 and 5. Refer to paragraphs 4.1-4.4 of this document.
C3	The economic development policies have taken account of existing planning policies as contained within the SPPS, in particular paragraphs 6.31 - 6.51. Regard has also been had to the UK Marine Planning Policy Statement and the draft Marine Plan for NI.
C4	The economic development policies have taken account of the existing development plans within Ards and North Down, ongoing Council initiatives and the neighbouring council context.
Coherence and Effectiveness Tests	
CE1	The economic development policies have taken account of the emerging LDP's of our three neighbouring Councils, and it is not considered to be in conflict with them.
CE2	The economic development policies are founded on a robust evidence base which includes the baseline information assembled in the Economic Development Position Paper, the POP (and responses to it) and subsequent consultation with consultees, including DfI and Invest NI.
CE3	The effectiveness of the draft plan strategy economic development policies will be monitored both in terms of the supply and also the loss of zoned land to alternative uses. If the provision of land falls below the supply detailed in the ELRR, this will prompt a review. Furthermore, planning and PAC decisions, the ELRR update and Employment Monitors will trigger a review if the loss of employment land to non-employment uses equates to more than 10% in a 5 year period.
CE4	Economic Development policies will be reviewed at Plan Review stage. There will be flexibility at Local Policies stage to introduce new and review existing local designations provided they are underpinned by a sound evidence base.

Appendix A – Strategic Economic Development Map

Showing existing and proposed draft BMAP and ADAP employment zonings that remain in economic development use and location of proposed Strategic Employment Locations.



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Appendix B – Relevant Sections of the Planning (Use Classes) Order (Northern Ireland) 2015

Part A

Shopping and Financial and Professional Services

Class A1: Shops

Use for all of the following purposes:

- (a) For the retail sale of goods other than hot food;
- (b) As a post office;
- (c) For the sale of tickets or as a travel agency;
- (d) For hairdressing;
- (e) For the display of goods for retail sale;
- (f) For the hiring out of domestic or personal goods or articles; or
- (g) For the reception of goods including clothes or fabrics to be washed, cleaned or repaired either on or off the premises

Where the sale, display or service is to visiting members of the public.

Class A2: Financial, Professional and other services

Use for the provision of services that it is appropriate to provide in a shopping area, where the services are provided principally to visiting members of the public including

-

- (a) Financial services; or
- (b) Professional services

Part B

Industrial and Business Uses

Class B1: Business

Use -

- (a) As an office other than a use within class A2;
- (b) As a call centre; or
- (c) For research and development which can be carried out without detriment to amenity by reason of noise, vibration, smell, smoke, soot, ash, dust or grit.

Class B2: Light Industrial

Use for any industrial process which can be carried out without detriment to amenity by reason of noise, vibration, smell, smoke, soot, ash, dust or grit.

Class B3: General Industrial

Use for carrying out any industrial process other than one falling within class B2.

Class B4: Storage and Distribution

Use for storage or as a distribution centre.

Part C**Residential Issues****Class C1: Dwellinghouses**

Use as a dwelling house (whether or not as sole or main residence) -

- (a) By a single person or people living together as a family; or
- (b) By not more than 6 residents living together as a single household where care is provided for residents.

Part D**Community, Recreation and Culture****Class D1: Community and Cultural Uses**

Any use (not including a residential use) -

- (a) For the provision of any medical or health service except the use of premises attached to the residence of the consultant or practitioner;
- (b) As a creche, day nursery, after school facility or day centre;
- (c) As a community centre;
- (d) For the provision of education;
- (e) For the display of works of art (otherwise than for sale or hire);
- (f) As a museum;
- (g) As a public library or reading room;
- (h) As a public hall or exhibition hall; Or
- (i) As a law court.

Sui Generis

No class specified in the Schedule includes use -

- (a) As an amusement arcade or a funfair;
- (b) As a betting office;
- (c) For the purposes of a funeral undertaker;
- (d) As a hostel where a significant level of care is provided;
- (e) As a hotel;
- (f) As a house in multiple occupation;
- (g) For the sale of fuel for motor vehicles;
- (h) For the sale and display of motor vehicles;
- (i) For the sale of food and drink for consumption on the premises or of hot food for consumption off the premises;

- (j) As a scrapyard or a yard for the storage and distribution of minerals of breaking of motor vehicles;
- (k) As a swimming bath, skating rink, gymnasium, or are for other outdoor or indoor sports or recreations including those involved with motorised vehicles or firearms;
- (l) For a taxi business or for the hire of motor vehicles;
- (m) For or in connection with public worship;
- (n) For the carrying out of any prescribed process which requires authorisation under Article 6 of the Industrial Pollution Control Order 1997; or
- (o) As a waste management facility for the collection, transport, treatment, recovery, recycling, transfer and disposal of waste.