

## Consultation response from Invest NI

|                                    |                                                                        |                                            |              |
|------------------------------------|------------------------------------------------------------------------|--------------------------------------------|--------------|
| <b>Planning Application Number</b> | Draft Plan Strategy                                                    |                                            |              |
| <b>Location</b>                    | Ards & North Down Borough Council<br>Local Development Plan (LDP) 2032 |                                            |              |
| <b>Date of Consultation</b>        | 17/10/2025                                                             | <b>Reconsultation:</b> <del>yes</del> /no* |              |
| <b>Date of response</b>            | 15/12/25                                                               | <del>Interim</del> *                       | Substantive* |

\* Strikethrough as appropriate

## Comments

Invest NI welcomes the opportunity to comment on this draft Plan Strategy.

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.

They are to be read alongside our response to the Preferred options Paper, your reference LDP/0092/E

Invest NI recognises that the Strategy is aligned with primary legislation including the Programme for Government (PfG), Regional Development Strategy (RDS) and Strategic Planning Policy Statement (SPPS) as well as the Council's Community Plan, "The Big Plan".

In relation to Economic Development, Invest NI acknowledges that the Council has carried out a number of evidence based reviews, surveys and frameworks to identify the most appropriate locations and quantities of land to be brought forward to enable and promote sustainable economic growth across the Borough.

The process has been underway for some time and world events in those years have changed the way many of us do business. It is therefore vitally important that the Council continues diligent monitoring of take up and assessment of need as the nature and demands of business evolve. Without a reasonable supply of available land for economic use, there may be a risk of those uses going elsewhere.

In that context, Invest NI notes that the RDS-based Employment Land Evaluation Framework will be used to allocate land for employment use, focusing on the urban hubs of Bangor & Newtownards as well as considering features such as connectivity and high quality design.

Invest NI considers the supply of suitable sites to be a key element of Northern Ireland's investment proposition. Without a sufficient provision of available (suitable) land upon which businesses can readily develop they may have to consider other locations outside of the Province for their investment plans. We would furthermore 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.

We note that the Strategy seeks to protect existing employment land from incompatible uses we would also caution that new adjacent uses may inadvertently cause problems for established economic development ones.

Similarly, when considering sustainable and active travel to and from work sites, it is important to bear in mind the safety of users, especially children, who may not be familiar with the inherent dangers of, say industrial estates. As a result we would strongly suggest that active travel routes go to rather than through economic development sites, such as industrial estates, to mitigate against the risk of accidents with heavy plant and vehicles associated with such uses.

We note that new development may be subject to developer contributions. We would argue that in certain cases, particularly when projects are being undertaken in a context of market failure, that the development itself should be considered as meeting the

goals of the policy and not be subject to an additional financial requirement.

In terms of the draft Strategy's economic elements Invest NI We note the LDP Strategic Approach and General Policies and consider the proposals to be in general conformity with the Council's Community, the RDS and/or the SPPS.

**Issued on behalf of Invest Northern Ireland**