PPS 23 – ENABLING DEVELOPMENT

NITB welcomes the opportunity to comment on PPS23. Planning is a key issue for NITB on the basis that land use management impacts on the ability to develop tourist infrastructure as well as ensuring that the natural and historic environment remains attractive to visitors in the long term. NITB considers that a flexible and enabling approach to planning is essential to realising the benefits that a successful tourism industry can bring to Northern Ireland.

Summary

The objective of PPS23 is to provide the flexibility to accommodate unforeseen imaginative proposals for development that are clearly in the public interest; whilst aiming to maintain and enhance the standard of community, cultural, educational, social and health infrastructure, the historic built environment, the restoration/ creation of wildlife habitats and a range of leisure facilities. Enabling development may also be allowed for a scheme of significant regional or sub-regional public benefit or to secure the future of a non-listed building of local significance.

The justification for allowing the enabling development lies in the over-riding public benefit to be derived from the implementation of the principal proposal which would otherwise have little prospect of being carried out and the enabling development must always be justified by the inherent lack of viability of the asset.

Essentially, PPS23 would allow a development proposal that is contrary to established planning policy to be permitted where that development or its proceeds are needed to secure the long term future of the heritage asset or other public benefit.

Context

Tourism is now recognised as a ‘key driver’ of the economy with recent strategies such as the ‘Jobs Plan’\(^1\), the Northern Ireland Executive’s Programme for Government\(^2\), and most recently in the draftTourism Strategy for Northern Ireland to 2020\(^3\) setting out the significant potential for increased jobs and revenue from tourism. However, the planning

\(^1\) Economic Framework developed jointly by the CBI, Centre for Competitiveness, Institute of Directors, Construction Employers Federation, NI Chamber of Commerce, Momentum, NI Food & Drink Association, NI Retail Association
system has consistently been identified as a barrier to the growth of tourism. For the recognised potential of the tourism industry to be achieved there is a real need for a positive relationship both in policy and practice between tourism and planning.

Consequently, in recent years, strategic tourism policy has consistently highlighted the need to address planning issues. NITB recently submitted detailed comments in relation to PPS16 to the effect that we are concerned that this does not go far enough in creating the flexibility that is required to enable the potential of the tourism in Northern Ireland to be realised.

**Principle**

NITB supports the principle behind PPS23 in that enabling development may be able to secure the long term future of a place of heritage significance, which otherwise may not be viable. From a tourism perspective, it is vital that we are able to safeguard Northern Ireland’s heritage assets. Authenticity is a key element of the Northern Ireland tourism brand. With public funding unable to support all such assets, there is a need for another avenue such as enabling development to allow for this.

There are clear links between Northern Ireland’s built and natural heritage and our tourism industry, with large numbers of domestic and out of state tourists visiting our historic properties every year. The NITB Visitor Attractions Survey 2010 reveals that from January to December 2010 there were 1,221,839 visitors to historic properties in Northern Ireland, with 150,000 visiting Mount Stewart alone. Country and Forest Parks, which we understand would also be covered by PPS23, attracted over 3 million visitors in 2010.

From a tourism perspective, it is essential that we continue to support our key assets and ensure that these remain viable and accessible both to local people and to visitors. In order to ensure that the visitor experience in Northern Ireland continues to meet and exceed expectations, we need to be able provide our visitors with the opportunity to visit places of cultural, historic or environmental interest. On the basis that PPS23 would enable the ongoing viability of such attractions or facilities, NITB is fully supportive of this policy.

**Scope of PPS23**

The draft policy proposes to consider development where it would enable the refurbishment of historic buildings and industrial heritage, restoration of historic parks, gardens or demesnes, restoration or creation of wildlife habitats, the provision of cultural,
educational, leisure, health and community facilities and even the cessation of undesirable land use. However, there is no reference to the provision of tourist or visitor facilities.

We would strongly urge that tourist facilities are included on this list on the basis that there are clearly social and economic benefits associated with the growth of tourism. Like historic buildings, visitor facilities may not always be profitable or even viable in their own right, but they can act as a catalyst for the growth of tourism in the wider area by attracting additional visitors and spend. The wider impact of such facilities would surely justify enabling development.

**Golf tourism**

From a tourism perspective, PPS23 could have a significant positive impact on the golf tourism market.

Golf tourism is considered to be a central tenet of the Northern Ireland tourism product and strategic policy for the future growth of the industry. Delivery of infrastructure to support the specific development opportunities associated with golf tourism will be vital if Northern Ireland is to meet the ambitious targets set out in the draft Tourism Strategy for Northern Ireland to 2020. This recognises golf tourism as a ‘key market segment’ and specifically identifies the importance of the development of ‘world class links golf resorts’.

However, proposals for new golf resorts in Northern Ireland have been hampered by planning difficulties. One of these difficulties relates to the fact that an element of commercial development is often necessary in order to ensure viability of the resort. The Economic Impact Assessment carried out in relation to a proposed golf resort on the North Coast concluded that;

*A free standing golf course of the required quality is unlikely to be a viable enough proposition in its own right to attract high quality developers and operators – because of the level of capital cost, the time lag between incurring that cost and starting to generate revenue, and their inherent limits in terms of physical carrying capacity, seasonality and pricing power.*

Consequently, most major new visitor orientated golf developments include provision of onsite visitor accommodation and frequently also residential housing. This improves the viability of the scheme and also provides an onsite customer base for the leisure facilities during the ‘off-season’. While the principle of residential housing on golf resorts has been established in ROI, difficulties continue to ensue in NI in relation to this concept. Consequently, we would welcome the application of PPS23 to this type of proposal.

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6 Economic Impact Assessment ‘Runkerry Development’, Michael Smyth (February 2011)
7 Mount Juliet GC, Kilkenny, K Club Co Kildare, Carton House Co Kildare
**Undesirable use of land**

Policy ED1 states that enabling development may be considered in order to assist with the ‘cessation and removal of undesirable use elsewhere on land in control of the applicant’. ‘The undesirable use of land’ is not a recognised planning term and therefore we would welcome clarification as to what may constitute this, with a number of example scenarios. Otherwise, there would appear to be a risk that this statement could result in a situation whereby landowners intentionally cause blight to their land in order to secure planning permission for ‘enabling development’ under the ‘undesirable use’ clause.

**Related issues**

While flexible planning policies will play an important role in enabling the development of much needed tourist facilities, we feel that it is also vital to engender a positive working relationship and an understanding of tourism development between the tourism industry and planning authorities.

We feel that the very need to introduce this Planning Policy Statement raises a number of issues.

a. **Forward planning**

While this Planning Policy Statement will undoubtedly play a valuable role in the short term, by ensuring that valuable community assets can be retained in a viable use, we would suggest that rather than considering proposals on an ‘ad hoc’ basis, it would be preferable to take a more strategic approach to the management of such assets. This could be achieved through development plans and associated planning briefs/masterplans, as is often the case in England through the Local Development Framework system. Planning briefs/masterplans should ideally map out the preferred use of such sites and identify any necessary development.

This approach would also give the community an opportunity to have their views heard at the outset and would also allow the ‘enabled development’ to be considered within the wider context of the development of the whole local area. Furthermore, if the need to restore/re-develop community facilities is identified in a development plan, developer contributions from commercial developments could be secured (as in England) in order to contribute to these. The Community Infrastructure Levy which was introduced in England in 2010, may provide a useful method of securing funding for community infrastructure.

Attractive landscapes and townscapes are an important aspect of the visitor experience, and consequently, NITB is interested in the long term impact on landscape and townscapes as well as the shorter term opportunities for developing tourism. While a masterplan approach
would be preferable to incremental development, in the absence of a development plan system that can accommodate this within a reasonable timeframe, there is a clear need for PPS23.

b. Knowledge, training and resources

NITB’s response to draft PPS16 raised the issue of training and knowledge within Planning Service. We feel that it is vital that there is sufficient expertise within planning authorities to assess tourism proposals – this necessarily involves a level of understanding of economics and in particular, market demand. In order for PPS16, and indeed PPS23, to be fully effective in terms of achieving tourism targets and delivering positive economic, social and environmental outcomes, we consider it vital that Planning Service and post RPA, the planning departments of local councils are properly resourced, including training where necessary to ensure that when assessing projects, planners have a full understanding of tourism and market demand.

Further engagement on PPS23 would be welcomed.