

## Queen's University Belfast

Specific responses to clauses 6 and 17 are set out below, but in summary:

The University, as a major investor in the local economy and one of the largest owners of listed buildings in Northern Ireland, believes that an efficient and effective planning system is critical to the development and economic growth of Northern Ireland. However, the amendments to clauses 6 and 17 introduce a level of additional requirement or ambiguity, which has the potential to cause further delays in the statutory planning process - rather than improve its efficiency and effectiveness as set out in the *Explanatory and Financial Memorandum*. This, in turn, may impede the delivery of development and the growth of a sustainable local economy.

### Clause 6: **Determination of Planning Applications**

Clause 6 makes the assessment of the economic advantages or disadvantages explicit within the process. While this is not in itself unreasonable, it is not clear why it is necessary. The principle of sustainable development is already at the heart of the planning process and this includes consideration of the social, economic, environmental and physical aspects of any proposal.

While it is appropriate to give economic benefits a high profile, there is concern as to how this will be measured and assessed. Clearly, the University can make the case that higher education, through innovation and knowledge exchange to the wider society, is vitally important for economic development and growth. It generates employment and output, not just in its own sector but in other sectors of the economy through secondary or 'knock-on' multiplier effects, it attracts export earnings and it contributes to the gross domestic product (GDP). Universities UK (UUK) estimates that for every 100 full-time jobs within a university, more than 100 other full-time equivalent jobs are generated through knock-on effects; and that for every £1m of university output, a further £1.38m is generated across the wider economy.

However, the University's overall major development strategy is based on an integrated programme of works, some of which require planning approval. It is not clear what sort of economic assessment will be required under clause 6 when submitting applications for individual projects that sit within the integrated programme. The University's development strategy will be critical in helping to support the Programme for Government and in growing a sustainable local economy.

### Clause 17: **Conservation Areas**

Essentially, this clause represents a change from the current *no harm* (preserve or enhance) test in Conservation Areas to one of enhancing the character of the area in cases where an opportunity to do so arises. Investment in, and development of, the built environment are essential to the economic health of Northern Ireland. While planning controls within specific areas (including Conservation Areas) are essential, unnecessarily stringent constraints on investment and development creates the risk that the areas will stagnate and the planning policy will have a negative rather than a positive impact.

This is a matter of achieving an appropriate balance between preservation and development and it is considered that current legislation and the associated documentation relating to the specific Conservation Areas (e.g. the updated *Design Guide for the Malone Conservation Area* published in December 2011) already provide a sufficiently high standard of control to allow Planning Service to make appropriate determinations in individual cases.

The proposed change is clearly an increase in the standard, but how 'enhancement' is assessed is obviously critical. It is highly subjective, and the Bill provides no definition or guidance in relation to this. There is, therefore, a risk that increasing subjectivity in the process will introduce greater uncertainty, widen the scope for objection, and increase the potential for delay to the process and the prospect of litigation. This could significantly impact on plans for investment in and development of Conservation Areas.

The University's views on this clause are not insular and self-interested, but rather reflect its position as a key, and permanent, stakeholder in the south Belfast area. Queen's is embedded in the city, is home to more than 23,000 students and 3,500 staff and is fast gaining a global reputation, with more than 70 countries represented within the student community. In the era of the knowledge-based economy, the University is playing an increasingly important role in economic development and its research is pivotal in underpinning Northern Ireland's industrial base and in supporting the Programme for Government.

A major element in this success has been the transformation of the campus since 2001, involving a major capital investment programme of over £350m. The challenge for the University is that much of its estate (250 buildings, of which 97 are listed as being of architectural merit) sits within three adjacent Conservation Areas. If Queen's is to continue its pivotal role in the local economy - and the total target capital investment in the estate for the period 2012-22 is a further £335m - it will be necessary to sensitively redevelop areas of the campus including substantial works within Conservation Areas.

The University is proud of its heritage and its historic estate - indeed the quality of our estate, and the built environment and public realm that bounds it, is a major part of the exceptional student experience that Queen's offers.

The University believes that clause 17 unnecessarily introduces a level of ambiguity into the statutory planning process, and this has the potential to cause further delays, rather than improve its efficiency and effectiveness. This, in turn, may hamper delivery of developments and the growth of a sustainable economy.

Our preference is for no change in the current legislation as it pertains to Conservation Areas or, if the clause is to remain, it is critical that the term "enhancing" should be very clearly defined.