

## DEPARTMENT FOR THE ECONOMY COMMENTS ON ANTRIM AND NEWTOWNABBEY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN 2030

### ENERGY EFFICIENCY

#### Issues to be welcomed

##### Draft Plan Strategy

- SP 9.4 - That the Council will support the development of a diverse range of renewable energy technologies ....;
- SP 12.11 – The Council will seek to promote low carbon lifestyles which utilise renewable energy supplies....;
- SP 12.22 – The Council aims to facilitate the development of renewable energy generation....;
- SP 12 .23 – The council recognised that greater use of renewable energy will create more dependable energy mix, reducing dependence on fossil fuels ....;
- DM 45.1 – Council will support proposals that generate energy from a renewable source ....;
- SP 12.28 – The Council requests from applicants the detail around decommissioning of renewable infrastructure when it becomes redundant;

##### Local Development Plan – Evidence paper 13

- Point 7.1 – recognition that *to underpin economic growth ....needs a modern and sustainable economic infrastructure, including reliable and adequate connections to renewable energy supplies;*
- Point 7.22 – the fact that *solar technology, especially PV Technology is on the rise in the Borough;*
- Point 7.23 – The Council would actively encourage all large and small businesses to consider switching to renewable energy .....

#### Issues of concern

##### Draft Strategy Plan

- SP 9.4 – Whilst it is welcome that the Council will support the development of renewable energy technologies the plan states that this will be in *'appropriate locations that do not have a detrimental impact on our natural heritage....* – it would be useful if the council could define what may constitute appropriate;
- SP 10.1 & 12.10 – see comment on SP 9.4 regarding renewable energy proposals in appropriate locations;
- DM 45.2 (a) & (c) & DM 45.3 – these assessments appear narrow in definition and open to individual opinion. Perhaps more detail is required regarding what the impacts may be;
- DM45.5 – there is a failure to recognise that turbines need to be placed where there is access to the best wind resource in order to be viable. Perhaps a line could be added that this will be taken into account;
- DM45.6 – there is a failure to take account of the fast changing pace of technology development in the sector and that larger, more efficient turbines may negate the need for high numbers of turbines in an area

## Local Development Plan – Evidence Paper 13

- Point 8.2 – *approach of SPPS that LDP ..... that will not result in an unacceptable adverse impact on the following...* it would be useful if ‘unacceptable, can be more clearly defined or examples provided;
- Point 8.5 – It should be defined what are the unacceptable effects of wind and solar energy development that planning officers and consultees should consider in relation to the airport.
- The network heat map at Figure 2 is four years old and so there may not be as much capacity left in the region as the Council thinks. Has NIEN’s view been taken on this and the assertion that there is “significant potential for grid connection of additional small-scale energy generation” as set out in the sixth bullet point of para 9.1?

### **Data upgrades/factual accuracies within the Local Development Plan –Evidence Paper 13**

- Executive Summary/Points 3.25 & 7.6 to 7.8 & 9.1 – latest official electricity consumption figure from renewables is 38.6% as at 31 March 2019 ([www.economy-ni.gov.uk/articles/electricity-consumption-and-renewable-generation-statistics](http://www.economy-ni.gov.uk/articles/electricity-consumption-and-renewable-generation-statistics))
- It should be noted throughout the document that it is on-shore wind energy that is the main source of producing renewable electricity in NI (to differentiate from off-shore wind);
- Point 3.25 – Update volume of electricity consumption – April 18 to Mar 19 Approx 7,809 GWh consumed in NI with 3,012GWh generated from renewable sources;
- Page 8 – EU Renewable Energy Directive has been replaced by RED II in December 2018 (2018/2001/EU).

## **FURTHER EDUCATION**

### **Section 5 Employment (Page 74-105)**

It is noted that in Section 5 Employment (Specifically Economic Development, Zoned Sites and Settlements) that Metropolitan Newtownabbey, Antrim, Ballyclare, Belfast International Airport and Nutts Corner are recognised as Strategic Employment Locations (SELs).

The Northern Regional College (NRC) campuses at Newtownabbey and Ballymena are well placed to serve these SELs. However public transport arteries are not well developed/served resulting in commuters/students need to travel into Belfast to get connections to Newtownabbey.

The Department’s £84 million capital investment project in Northern Regional College’s campuses on the current sites in [Union Street, Coleraine](#) and [Farm Lodge, Ballymena](#) will deliver state of the art facilities. The new builds are scheduled to be completed in 2022/3.

The Council’s approach to Innovation, Investment and Enterprise with a target of 9,000 new jobs over the next 10 years is noted. As the designated FE Sector Entrepreneurship Lead Hub, NRC is engaging with the Entrepreneurship Ecosystem in the ANBC region and collectively working to increase the entrepreneurial offer for start-up businesses. NRC has had initial discussions on partnership with Council and LEAs that will include incubation

space at both Newtownabbey and Ballymena Campuses. The college action plan for entrepreneurship includes the delivery of support programmes for new and existing enterprises in the form of Knowledge Transfer, Technology Transfer and Skills Transfer strategically linking to this Local Development Plan.

The special significance of Belfast International Airport and Nutts Corner SELs is noted, in particular the development of transport and logistics (Section 6). NRC is working with international partners, specifically Albeda College Rotterdam, Netherlands to develop knowledge and skills based programmes (Higher Level Apprenticeships) and qualifications for the transport and logistics sector. Progress in this new curriculum area is being reported through the Mid and East Antrim Council (MEAC) Manufacturing Task Force.

## **Section 6 Transport and Infrastructure (Page 108-129)**

It is noted that Section 6 Transport primarily focused on upgrade of road networks and connections with public transport such as park-and-ride facilities, thereby creating an integrated transport network. These improvements are welcomed, however the concerns raised (section 5) regarding ANBC residents ability to travel to NRC's campuses at Newtownabbey and Ballymena without the need for multiple transport modes remain.

It is noted that Section 6 Telecommunication Facilities and Digital Services are a significant aspect of the Local Development Plan. ANBC commitment to enhance digital connectivity is welcomed. In alignment with the ANBC Local Development Plan NRC is committed to enhancing digital learning opportunities for enterprises and residents located in the ANBC region and views this strategy as making a positive contribution to regional economic growth, increased entrepreneurial start-up activity and home working opportunities.

## **ECONOMIC STRATEGY**

### **Outcomes Delivery Plan**

- The Department welcomes the linkages set out within the Council's Plan to the draft Industrial Strategy/ Programme for Government, including two of the DfE- led economic outcomes (1 and 5). Local Government will be an important partner in delivery of these overarching outcomes and it is good to see the Plan recognises the need to align the work of the Council with the strategic direction set by the outcomes framework.
- The Department has noted the specific links to the DfE-led outcomes as set out below:

#### Outcome one

- to facilitate the creation of 9,000 new jobs by 2030 to cater for a growing population.

#### Outcome five

- encourage the development of telecommunications facilities and digital services that assist the local economy or support local communities

## **Entrepreneurship**

- The Department recognises the importance of encouraging and supporting entrepreneurship in achieving our economic goals. We therefore welcome the Plan's recognition of the need to stimulate and grow the number of people choosing self-employment as an option.

## **Circular Economy**

- The Department welcomes the move towards a circular waste economy and the shift away from landfill disposal of waste.

## **Productivity**

- The Department welcomes the efforts made by the Council to improve productivity, invest in innovation, tackle economic inactivity and deprivation, address skills gaps and inequalities, invest in additional world-class visitor experiences and develop the physical and digital infrastructure.

## **TOURISM**

### **Strategic Context**

The Department for the Economy is responsible for a number of key Programme for Government objectives including ensuring that we build a strong and competitive, regionally balanced economy where we have more people in better jobs and that we have created a place where people want to live and work, to visit and invest. In this context, tourism is widely recognised as an important driver of economic growth with the potential to create sustainable jobs across Northern Ireland and drive sub-regional growth.

The Department has responsibility for policy and legislation provision for tourism in Northern Ireland. Tourism NI plays a pivotal role as the strategic leader for the development of tourism products and experiences in Northern Ireland. It seeks to do this collaboratively and in partnership with others, including other Northern Ireland Departments and Agencies, stakeholders and local government. As with all local authorities, Tourism NI works closely with Antrim and Newtownabbey District Council and sees great value in this collaborative working arrangement, particularly through the dedicated Tourism NI regional manager.

### **Comments**

Both the Department and Tourism NI welcomes both the opportunity to comment on Antrim and Newtownabbey Local District Council Preferred Options Paper and that the comprehensive paper establishes an aim to promote sustainable tourism and economic diversification. The approach is complementary to the strategic drive in respect to tourism in Northern Ireland and will form a key aspect to the Department's overarching NI Tourism Strategy, going forward.

Tourism NI is committed to ensuring that future tourism growth is sustainable, dispersed across Northern Ireland positively impacting local communities while ensuring that our physical environment and landscape are not degraded from tourism development.

Tourism NI is reassured that the process to develop the Preferred Options Paper has reviewed current operational planning policy including PPS 16 Tourism and has found these to be acceptable to current needs.

## **STRATEGIC CONTEXT FOR TELECOMMUNICATIONS**

Telecoms is a reserved matter under the remit of the Department for Digital, Culture, Media and Sport (DCMS) in London. The UK Government (UKG) and Westminster Parliament are responsible for setting the overall policy and regulatory framework for telecoms. Ofcom, as the UK's independent regulatory authority, is responsible for implementing the framework, and for making regulatory decisions under its statutory duties.

The Digital Economy Act 2017 sets out the UKG's role in defining the strategic priorities and outcomes in relation to telecoms through a Statement of Strategic Priorities (SSP), which Ofcom must have regard to when carrying out its regulatory functions.

Relevant UKG strategies can be found on the DCMS website including: [Future Telecoms Infrastructure Review](#) – DCMS (published July 2018). This is a key document setting out a national, long term, strategy for digital connectivity for the UK, including plans for legislative and regulatory interventions in the coming years and aspirations including 'nationwide full fibre connectivity by 2033' and the UK as 'a world leader in 5G'.

The Department is liaising with DCMS on the implications for Northern Ireland.

### **Northern Ireland**

In Northern Ireland, the Department's focus is to improve access to a broadband service of at least 30Mbps (superfast). In the draft Programme for Government 2016-2021, Outcomes 5 and 11<sup>1</sup> are the primary areas where delivery on telecoms infrastructure is captured.

Through the Communications Act 2003, the Department has limited powers to intervene in the market, and can do so only to encourage private sector investment in geographical areas that would not be commercially attractive to the industry. Any public intervention has to be undertaken with caution to avoid distortion of the market and to comply with EU broadband and competition regulations/guidance.

There are future proposals for the development of a Digital Infrastructure Strategy as outlined in the Draft Industrial Strategy for NI, however, this is at a preliminary stage in development.

### **Project Stratum**

The overarching objective for Project Stratum is simply stated; to provide universal, or near universal, high speed broadband coverage in Northern Ireland by increasing provision (broadband access infrastructure such as: cables, ducts, and other electronic systems) in areas which are currently poorly served and not capable of attracting wholly commercial investment - in other words, the remaining 10% of premises in Northern Ireland currently unable to access broadband services delivering speeds of 30Mbps or greater. The Project Stratum intervention area is predominantly rural and covers a broad swathe of Northern Ireland, targeting approximately 98,000 premises.

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<sup>1</sup> <https://www.executiveoffice-ni.gov.uk/topics/making-government-work/programme-government-and-budget>

The project has been developed in response to the opportunity presented by the Confidence and Supply Agreement between the Conservative Party and the Democratic Unionist Party following the General Election in June 2017, which promises £150m to help improve the availability of high speed broadband in Northern Ireland.

The Department, in agreement with the Department of Agriculture, Environment and Rural Affairs (DAERA), has confirmed that an additional £15m of funding will be made available and applied to eligible expenditure for Project Stratum. The total identifiable public funding for Project Stratum is, therefore, £165m.

A public State aid consultation (which closed on 14 January 2019) followed an earlier industry consultation stage which ran from 19 June 2018 to 27 July 2018. This was undertaken to establish existing and planned (within the next 3 years) coverage of broadband infrastructure across Northern Ireland.

The public consultation set out the proposed intervention area, to enable all interested stakeholders (including the public, businesses, internet service providers and broadband infrastructure operators) to comment on the proposals. The Department expects to be able to publish the result of these consultations in Autumn 2019.

The Project has completed its first stage procurement in summer 2019, and will issue an Invitation to tender subsequently with contract award in spring 2020. The project is currently planned, subject to approvals, to roll out over the period 2020 – 2024.

### **Baseline data – fixed and mobile networks**

Ofcom's [Connected Nations 2018](#) report, and its associated NI regional supplement and data downloads, provide the most recent coverage figures, including those at Council level. This analysis continues to demonstrate that rural premises have poorer access to coverage than urban premises and the Department encourages actions that will assist in reducing this deficit.

### **Planning for new builds and shared access to infrastructure**

As noted above, the UKG strategic framework to 2033 has been articulated in the Future Telecoms Infrastructure Review. One aspect of this framework is work to address deployment barriers and reducing cost for efficient delivery of infrastructure, including an approach to ensuring fibre connectivity in new builds.

DCMS has published a suite of guidance for local authorities on a range of related matters through the Digital Connectivity Portal:

<https://www.gov.uk/guidance/digital-connectivity-portal>

The Department wishes to draw your attention to this helpful guidance, alongside your mitigation measures identified at page 113 of the POP, and to consider actions such as the reuse of public assets, and shared access to existing infrastructure, 'dig once' etc. as additional measures that could support the aim of improving connectivity.

Whilst the current publicly supported telecoms infrastructure projects, such as Project Stratum, will go a long way to correcting the deficit in access for premises currently identified

as below 30Mbps, it is important that planning approvals for new premises ensure that appropriate connectivity is provided for at the outset.

We would direct you to the DCMS advice that:

*'Local authorities can help to create incentives for future investment in digital infrastructure in their area by ensuring Local Plans effectively support it. To do this, Local Plans can outline how planning policies will support the rollout of both fixed and mobile infrastructure.'*

*This could include policies that will support the future of mobile connectivity and the rollout of small cells for 5G, which is most likely to be needed in dense, urban areas.*

*For example, a Local Plan could ensure that all new developments have sufficient ducting space for full fibre connectivity and/or support the effective use of rooftops and street furniture to accommodate mobile digital infrastructure, including small cells for 5G.'*

We would therefore recommend that consideration be given to:

- extending the list of utilities to include access to telecommunications infrastructure;
- ensuring that no new homes are built without access to appropriate telecommunications infrastructure; and
- ensuring provision of appropriate telecommunications infrastructure, not only to new, larger (25 home +), developments, but also existing single dwellings.

## **UK-wide Initiatives**

The following section outlines a number of telecoms-related support schemes operated on a UK-wide basis that may be relevant to the Council in the development of strategies or options at this time.

### **❖ Better Broadband Scheme (BBS)**

This scheme is in place to provide an affordable, basic broadband installation to homes and businesses that are unable to access a broadband service with a download speed of at least 2 Mbps and will not be the recipient of any State aid support within the next 12 months. Further details can be found at: <https://basicbroadband.culture.gov.uk/>.

### **❖ Gigabit Broadband Voucher Scheme**

This scheme opened in March 2018, and is aimed at small or medium-sized businesses who may be able to get a grant of up to £3,000 to help upgrade their broadband to a gigabit-capable connection. Local communities can also benefit from the scheme - groups of residents can combine with local businesses to access gigabit speeds in community group projects. In a group project each residential user can access grants of up to £500 each to contribute towards the cost of connection. This scheme is demand-led with service providers identifying projects or pockets of consumers where gigabit capable services can be delivered. The service providers promote the services and consumers can use a voucher to assist with the cost and installation of a service.

We would highlight the opportunity presented by this scheme to businesses and residents in your area and encourage uptake where possible.

<https://gigabitvoucher.culture.gov.uk/>

[A Rural Gigabit Connectivity Voucher has recently been launched by DCMS, with enhanced levels of UKG support for qualifying households and businesses. Further details are on the same link above.](#)

#### ❖ ***Universal Service Obligation (USO)***

The USO is a UK-wide measure, intended to fill the gap left by the UKG's existing broadband roll-out programmes, as part of the commitment in the UK Digital Strategy<sup>2</sup> (March 2017), to ensure that the UK has world-class digital connectivity and inclusion. This has been implemented by a regulatory approach.

The USO provides a legal right to request a broadband connection of at least 10Mbps download speed, up to a reasonable cost threshold (expected to be £3,400). A universal service provider will be obliged to build all reasonable requests. At present in NI, it is expected that approximately 56,000 premises could be captured by the USO.

The USO is expected to be funded by a cost-sharing industry fund. The Government is aiming for the USO to be in place by 2020 at the latest. Responsibility falls to Ofcom to implement the USO.

<https://www.ofcom.org.uk/phones-telecoms-and-internet/advice-for-consumers/broadband-uso-need-to-know>

The Department encourages all relevant parties to maximise the benefits from all such schemes to their respective regions.

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<sup>2</sup><https://www.gov.uk/government/publications/uk-digital-strategy>