

Department for the Economy's composite response regarding Lisburn and Castlereagh City Council Local Development Plan 2032, draft Plan Strategy

Invest NI

Invest NI has been engaging directly with the Council throughout the Local Development Plan process. As a result of this engagement Invest NI has been consulted separately on the draft Plan Strategy and therefore intends to provide its comments directly to the Council.

Strategic Policy Division

Industrial Strategy/Programme for Government

The Department welcomes the linkages set out within the Council's Plan to the draft Industrial Strategy/Programme for Government. Local Government is an important partner in delivery of economic outcomes and it is good to see 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:

- Facilitating the creation of new jobs and encouraging existing and new businesses to invest with confidence.
- Promoting access to higher and further education to meet employment needs.
- Equipping the workforce with the right skills to secure employment and/or start a business.
- Facilitate the delivery of telecommunications and utilities infrastructure throughout the plan period.

Circular Economy

The Department is currently developing a policy framework for Circular Economy in Northern Ireland and in this context, Strategic Policy Division welcomes the Council's strategic targets for recycling and recovery and providing and maintaining sufficient capacity to deal with the waste produced.

Minerals and Petroleum Division

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 whilst ensuring that we live and work sustainably. It is within this context that the Department's Minerals and Petroleum Branch and the Geological Survey of Northern Ireland (MAPB and GSNI) make the following response.

MAPB/GSNI welcomes the opportunity to engage with Lisburn and Castlereagh City Council in the preparation of its Local Development Plan (LDP).

The issue of mineral development requires a carefully balanced approach to maximise the potential economic benefits while ensuring adequate protection for the environment. The Council's proposal in relation to mineral development indicates a balanced approach to this subject. Set out below are specific comments on the Draft Plan Strategy.

Strategic Policy 13 Mineral Development

MAPB and GSNI welcomes the Council's balanced approach, in Strategic Policy 13, to minerals development, in that it recognises the economic need for minerals and the need to safeguard the environment. The Council has also taken account of DfE guidance regarding the need for a regional consideration of mineral supply and demand.

DfE is finalising the annual minerals statement for 2018 which will provide the Council with more data on the regional production of minerals to inform the development of safeguarding and constraint areas at the Local Policies Plan stage.

MAPB and GSNI are content to provide advice and support in relation to the identification of areas of safeguarding and constraint during the local policies plan stage.

Minerals Development Operational Policies

MAPB and GSNI are largely in agreement with the Minerals Development operational policies given that they are intended to facilitate appropriate, sustainable development with no presumptions against proposals other than in areas of constraint. The intention that there will be no presumption against proposals for development of high value minerals, even in areas of constraint is supported.

Strategic Policy 21 Renewable Energy

In 2019 the Government set a target of net zero greenhouse gas emissions by 2050. Although 2050 is beyond the end date for the LDP, this target should be a consideration for all developments within the timeframe of the LDP.

LDP policy on Renewable Energy could benefit from greater consideration of geothermal and district heating schemes which are likely to be needed to meet future net zero targets and promote sustainable economic growth. New housing and industrial developments will need to be designed to have as close to zero CO₂ emissions as possible. Heat pump technology is currently available and could be incorporated in new build designs to optimise

the use of electricity from low carbon sources by providing heating and cooling. Ground source heat pump (GSHP) systems, can be used to provide heat to single dwellings or via heat networks to housing developments and industrial estates, business parks and public sector complexes.

Much of the Lisburn City and Castlereagh Council area is underlain by permeable sandstone bedrock (aquifer), which is suitable for the installation of open loop borehole GSHP systems to provide low carbon heating and cooling. The geothermal energy from the water contained in these rocks can be extracted to provide year-round 24/7 heating and cooling where the heat pumps use one unit of electricity to produce an equivalent output of about four units of heat. Where bedrock aquifers do not occur, closed loop GSHP systems can be used to extract heat. Arrays of boreholes with closed loop systems can be used to meet significant heating and cooling loads – for example, in Dublin IKEA constructed a large closed loop GSHP borehole array beneath its car park to meet its heating/cooling needs.

Strategic Mixed use Policies

The area designated as Strategic Mixed Use West Lisburn/Blaris is almost entirely underlain by sandstones of the Sherwood Sandstone Group (SSG), a regionally important aquifer, so the potential use of shallow geothermal energy should be considered, at a strategic level, when development within this area is being planned. Although the Sprucefield Regional Shopping Centre site is nearly all underlain by older Lower Palaeozoic rocks that are poorly productive aquifers, it is adjacent to the area underlain by the SSG aquifer and could be included in a single heat network with the heat supplied from geothermal or other low carbon energy sources. By contrast, the Purdysburn/Knockbracken Mixed Use designation area is largely underlain by low permeability Lower Palaeozoic rocks but would be suitable for the deployment of closed-loop GSHP systems for heating and cooling purposes. The Maze site is underlain by Permian and Triassic rocks which would be suitable for the installation of open loop or closed loop GSHP borehole arrays, to provide energy to single buildings or a heat network.

Contribution to other strategic policies

Strategic energy system planning should feed into Strategic Policies 04 Supporting Sustainable Economic Growth, 05 Good Design and Positive Place-Making, 06 Protecting and Enhancing the Environment and, particularly 07 Section 76 Planning Agreements. Strategic Policy 07 provides a list of positive contributions developers could make, but it does not include the contribution they could make to the transition to a low carbon future – you may wish to consider in terms of energy efficiency and the deployment of low carbon energy systems. These could be dealt with under planning conditions applied to individual developments but it may be appropriate to include them here in a strategic context.

Telecoms Division

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'.

Northern Ireland

In Northern Ireland, the Department's focus is to align with UKG policies and improve access to a broadband service of at least 30Mbps (superfast). In the draft Programme for Government 2016-2021, Outcomes 5 and 11¹ 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.

Lisburn and Castlereagh City Council is a partner in the Belfast Region City Deal, and it would be expected that the Deal and its associated economic impacts would be referenced in the Draft Plan Strategy.

Draft Plan Strategy

The recognition given to digital infrastructure within Strategic Policy 01 (Sustainable Development), 02 (Improving Health and Wellbeing) is welcomed.

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

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

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 and encourages the Council to consider actions such as the reuse of public assets, and shared access to existing infrastructure, the 'dig once' principle and the provision of ducting within Public Realm projects etc. as additional measures that could support the aim of improving connectivity within the Council area.

The Department for the Economy's analysis indicates that just over 5,400 premises in LCCC cannot yet access 30Mbps broadband services. Whilst the current publicly supported telecoms infrastructure projects, such as the Council's own Local Full Fibre Network (LFFN) project and the Department for Economy's Project Stratum (including Confidence and Supply investment), will go a long way to correcting the deficit in access for premises currently identified as below 30Mbps, it is important that interfaces with the planning systems in LCCC 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:

- Ensuring that no new premises are built without access to appropriate telecommunications infrastructure;
- Ensuring provision of appropriate telecommunications infrastructure, not only to new, larger developments, but also actions to facilitate the provision of such infrastructure to existing single dwellings and where conversions / extensions and reuse of premises are proposed and;
- Measures to facilitate the provision of appropriate mobile connectivity infrastructure in not-spots.

Measures such as these, which consider digital infrastructure needs at the design stage of new development (or conversion and extension), will support LCCC's comment regarding the need to control telecommunications development so that landscape and local character are not destroyed, whilst facilitating connectivity needs of citizens and businesses.

Tourism NI (This has been sent to Lisburn and Castlereagh City Council directly)

Tourism NI welcomes the publication of Lisburn & Castlereagh City Council Local Development Plan 2032 - draft Plan Strategy and the opportunity to comment.

Tourism NI has engaged and worked closely with Lisburn & Castlereagh City Council's (LCCC) Planning Dept. over the past two years or more as part of 1-1 Meetings and wider Stakeholder Engagement Meetings and Events and has contributed to the direction and content of the draft Plan Strategy from a tourism perspective.

Tourism NI is also represented on the LCCC Community Planning Partnership as a statutory partner and works very closely with the Council's Tourism Department on a number of projects and initiatives.

Tourism NI appointed a dedicated Regional Manager for the LCCC area in 2016 and has since supported and part funded a Tourism Strategy 2018 - 22 for the LCCC area and which is currently being implemented.

The Local Development Plan 2032 – Draft Plan Strategy establishes:

- A clear aspiration to grow the visitor economy through a sustainable approach that will balance the needs of the visitor and tourism industry, with careful protection of the built and natural environment.
- That the existing city and town hubs, for example Hillsborough and Lisburn, and rural settlements provide the best option for the growth of sustainable tourism accommodation. Settlements typically offer existing services and facilities that visitors enjoy and facilitate a gateway to natural assets.
- The need for additional hotel accommodation in the district and Tourism NI welcomes the fact that some progress has been made in this area with the development of a new 52-bedroom hotel in Lisburn Square, due to open in 2020.

Tourism NI is content that the approach outlined seeks to achieve sustainable tourism growth coupled with the preservation of our built and natural assets. The approach is sensitive to the preservation of the natural environment while seeking to enable communities to prosper sustainably.

Tourism NI encourages policies and initiatives that encourage balanced and sustainable growth of tourism facilities, services and tourism accommodation portfolios within the district Councils existing towns and settlements.

In November 2019, Tourism NI launched its new Experience Band, Northern Ireland - Embrace a Giant Spirit and which features visitor experiences in the LCCC area and Tourism NI will continue to work in partnership with LCCC to develop further visitor experiences in the LCCC area in the months and years ahead.

The recent re-development and investment of £20m in Hillsborough Castle & Gardens by Historic Royal Palaces as well as the Council's recent and ongoing investment in

Hillsborough Forest Park, has transformed Hillsborough into an attractive and appealing heritage town and experience.

Furthermore, the opportunities that exist around LCCC's council partner status in the Belfast Region City Deal means that further investment in Hillsborough as a tourism destination in the area is being planned. Tourism NI is working with all of the Council partners as part of the Belfast Region City Deal, to ensure that investment in tourism is aligned to key objectives in the draft NI Tourism Strategy – Tourism 2030, including the doubling of visitor spend to £2b by 2030.

NISRA research figures indicate that there has been a steady growth in tourism spend in the LCCC area of 24% since 2013 albeit from a relatively low base. In 2018, the LCCC area represented 3% of all tourism spend in N. Ireland.