

**DEPARTMENT FOR THE ECONOMY COMMENTS ON MID AND EAST ANTRIM  
BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN 2030 - PROPOSED  
MODIFICATIONS TO THE DRAFT PLAN STRATEGY**

**Telecoms**

- With regard to the telecoms elements of the LDP, the current version does not seem to take sufficient account of the change in the industry where existing copper infrastructure is likely to be replaced with fibre. There are likely to be activities by new infrastructure operators in the near future deploying such infrastructure and advice or guidance in this document would be helpful when rolling out infrastructure.
- The processes currently in use in the telecoms industry will make use of existing poles and ducts where possible but, in some circumstances, new infrastructure may be needed. This could be new poles, ducts in roads and a requirement to install small cabinets at key locations. There could be resistance to more wires or boxes being added to existing poles, increased requests to bury duct infrastructure and objections to new cabinets being built. It would be helpful if the LDP were to give guidance on these areas to provide some certainty to operators as they upgrade telecoms infrastructure in the council area.
- Another area that should be considered is how telecoms infrastructure providers might deploy new infrastructure or upgrade existing infrastructure in sensitive areas, such as ANOBs. There is some evidence that telecoms infrastructure providers are already having difficulties in relation to the deployment of new poles in ANOBs. There are also difficulties in relation to closing roads to deploy infrastructure.
- Whilst these issues can be managed, they are likely to either increase costs or delay the deployment of infrastructure making the region less attractive for investment.

**MINERALS (M&EA MODIFICATIONS)**

- Minerals & Petroleum Branch has considered modifications PM-073/081/082/088/094/095 and is content that the modifications address the related comments raised in the Department's original response on the Minerals chapter of the Draft Plan Strategy.

## **Invest NI**

- Invest NI welcomes the opportunity to comment on the Proposed Modifications to the Mid & East Antrim Local Development Plan draft Plan Strategy.
- While the bulk of the proposed modifications do not need comment from the organisation, there are a small number of changes that it wishes to note:
  - **PM-002**  
Invest NI notes the potential that issues with the Carrickfergus sewerage network system and wastewater treatment works have the potential to impact on capacity for new connections and may lead to new connections being refused. It is important, as the Development Plan moves forward, that these issues are clarified ahead of the identification of new development zonings in the Local Policies Plan as the inability to connect to the sewerage network may, in effect, prevent development in the affected areas.
  - **PM-004**  
Invest NI notes the proposed change from “sufficient” to “generous” in the Economic Objectives regarding land supply change, aligning the Plan with the Strategic Planning Policy Statement.
  - **PM-042**  
Invest NI notes that, for clarity, in towns permissible economic development Use Classes are now being specified whereas the phrase “business and industry use” in villages & small settlements has been replaced by “economic development use”. Invest NI notes that there may be uses that could be considered as “economic development” that would fall outside Class B (Use Classes Order) and would ask if Council considers if this change raises the potential of land used or last used for Class B uses being lost to another use.
  - **PM-051**  
Invest NI notes the clarification on the definition of the Edge of Town Centre boundary.
  - **PM-117**  
Invest NI notes, and welcomes, the clarity provided on the criteria for the adoption of SuDS schemes by NI Water.
  - **PM-136**  
Invest NI notes the new paragraph on future-proofing of new residential or commercial developments for future telecommunications connections and upgrade and the importance of such future-proofing in facilitating business.

No updates were provided from Further Education; Strategic Policy; Tourism; and Energy perspectives, to what was previously stated in September 2019.