

Antrim, Ballymena and Larne Area Plan 2016 Public and Community Consultation

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Executive Summary

The public and community consultation on the Antrim, Ballymena and Larne Area Plan 2016 was facilitated by Community Technical Aid (CTA) and took place from November 2001 to August 2002.

The consultation was a proactive process with key steps undertaken to ensure its success. These included: promotion of the process through newspaper advertisements; regular contact with the key community network and council community development staff; written and verbal communication with identified community, voluntary and environmental groups in the three council areas; a community outreach programme with numerous community groups focused on areas of weaker community infrastructure; structured interviews with organisations representing statutory equality groupings; planning workshops with young people in schools throughout the area; drop in sessions at different times of the day in three key locations in the Plan area; and a series of evening time public meetings in each area from late May 2002 to mid June 2002.

Hundreds of people, including young people, community groups, voluntary groups, environmental groups, equality grouping representatives and members of the public voiced their opinions and comments as residents and concerned citizens with an interest in the Antrim, Ballymena and Larne Area Plan. Their views were considered and sometimes reflected feelings of cynicism and frustration about the planning system. Overall they raised many diverse topics and issues ranging from housing to protection of the environment.

The problems associated with obtaining planning permission for a house in the countryside and the need for an equitable distribution of new housing units throughout the Plan area were raised frequently during the consultation. Town centres were said to be in need of new life and the tourism sector in need of a boost.

Roads and transport systems are in need of upgrading and investment in many people's opinion as are water and sewage facilities. The need to protect the natural and built environment and to provide for more community facilities, business units, recreation and open space was often highlighted. Other issues included the need for a radical overhaul of the way the planning system operates to enable it to plan not just for the physical environment but socially and economically also.

Issues dominating at a more local level were raised throughout the consultation. In the Antrim Borough the prevailing issues include: the need for affordable housing especially in Crumlin, Randalstown and Templepatrick; the overdevelopment of Crumlin and the need to halt developments there; resistance to the proposed Clanadry Village development; the need to regenerate Antrim town and fulfil the RDS hope that it becomes a 'counter-magnet' to the Belfast Metropolitan Area; and the serious road and traffic problems in Crumlin and Toomebridge.

Comments at the Ballymena Borough meetings centred on the need for careful consideration of new housing zonings to accurately cater for growing populations;

Ballymena town centre's need for regeneration and growth; the current inability of small businesses and industries to establish in the Borough; the poor roads infrastructure; and the untapped tourism potential in many parts of the Borough.

Discussions at the Larne meetings by contrast focused on: problems with apartments and second homes along coastal areas; the inability of many small settlements to sustain further growth; the need to reinvigorate Larne's town centre, tourism and industrial sectors; road and traffic problems in the Borough especially in Larne town; the environmental destruction occurring at Glenarm and Islandmagee; and the need to nurture important natural environments at Larne Lough and along the shoreline at the foot of the Glens.

The people who took part in the consultation were at times despondent about the Plan's ability to deliver on many of the issues they had identified. Others urged the Planning Service to be resolute and bold in its approach saying that only in this way can solutions be found.

These communities are positive about what can happen. They said that the Antrim, Ballymena and Larne Area Plan is being prepared at an opportune time and are hopeful that the Plan will enable the three council areas to grow and develop in ways which will be acceptable to everyone. They urged the Planning Service to take their views and comments on board in the preparation of the Draft Plan and look forward to the publication of the plan in 2003.

I. Introduction

The new Area Plan for Antrim, Ballymena and Larne is at an early stage of preparation by the Planning Service. When complete this Plan will guide development for the period up to 2016 and it will inform the public, statutory authorities, developers and other interested parties of the planning policy framework and land use proposals which will be acceptable in the three council areas of Antrim, Ballymena and Larne. It is an important document and one which holds the key to the future shape of this part of the region.

Many issues will be dealt with in the Area Plan including the location of new housing and industry, environmental areas in need of protection, tourism and how its growth can be sensitively accommodated and appropriate locations for the provision of new community and recreational facilities and open space.

At this early stage the Planning Service has produced an Issues Paper which focuses discussion on a range of issues with the aim of encouraging feedback that will help to shape the Draft Plan due in late 2003. The Planning Service consults directly with statutory agencies, government bodies and councils on the Issues Paper, however this is only one aspect of the consultation. Proactive public and community sector consultation is also undertaken and this Report is an account of this element of the process.

The Issues Paper contrasts sharply as an approach with the previously-used Preliminary Proposals document. The preparation of Preliminary Proposals was criticised as an outdated and ineffective method of preparing an Area Plan with critics believing that the majority of land use decisions had already been taken. The inclusion of maps with proposed development limits and proposed land use zonings did nothing to counter this belief.

As an alternative the Planning Service introduced the Issues Paper in an attempt to move away from the Preliminary Proposals and with the main hope of producing a Draft Area Plan in a shorter time period. More importantly the Planning Service was keen to adopt an inclusive approach to the preparation of Area Plans. The proactive community and public consultation that is now undertaken is part of a robust process and is in line with government policy on inclusiveness and community participation in planning.

As part of this new approach to public participation, Community Technical Aid (CTA) was appointed by the Planning Service in November 2001 to undertake independent consultation with the public, representatives of equality groupings and community, voluntary and environmental groups on the Antrim, Ballymena and Larne Area Plan. The findings from all aspects of this consultation are detailed in this Report.

Section 2 provides background information on the rationale for the consultation approach, Section 3 explains the methodology employed, Section 4 reports on the consultation findings and Section 5 concludes the Report.

This Report is CTA's responsibility as independent organisers and facilitators of the public and community consultation. It is an account of the comments made by the hundreds of people who participated in many ways and at many different stages of the consultation. We have used our judgement in writing this Report, summarising the comments made and issues raised while seeking to ensure the accuracy and emphasis is not compromised in any way.

This Report was submitted to the Planning Service in August 2002 and thereafter issued to all participants.

2. Background

Community Technical Aid is the only regional voluntary organisation which provides planning aid and architectural services to community and environmental groups in disadvantaged areas. For many years CTA has argued for increased community participation in the planning system in recognition of the fact that communities have suffered for too long from the effects of a system where developers and others have the resources and expertise needed to engage in the Area Plan process while many communities do not.

As a result of this imbalance communities have often felt powerless to change or influence planning policy and Area Plan formulation. To a degree this is now being addressed by the Planning Service's introduction of the Issues Paper approach and commissioning an independent organisation to undertake public and community consultation on its behalf.

CTA welcomes these developments and the progress made by the Planning Service and is pleased to have had an instrumental role in the process.

We were appointed by the Planning Service following a successful tender bid to undertake independent, inclusive and robust consultation with the public, community, voluntary and environmental groups and representatives of equality groupings on the Antrim, Ballymena and Larne Area Plan 2016. This appointment began in November 2001 and ended in August 2002.

3. Methodology

Community Technical Aid divided the Antrim, Ballymena and Larne Area Plan consultation into two stages - a preliminary fact finding and exchange of information stage and a consultation stage following publication of the consultation document, the Issues Paper.

The first stage, which is not often used in traditional consultation, involved outreach work, education, information and support to those communities we were trying to engage in the process. Inclusion of this stage resulted in more meaningful consultation and helped to involve communities from the outset, thus giving them a degree of ownership of the process. When this does not happen a fractured consultation often ensues, consultees are involved instead at the midway point in the process and are left feeling removed from the outcomes.

Mindful of this and the need for inclusive and meaningful consultation we factored this pre-consultation stage into the Antrim, Ballymena and Larne Area Plan process. It covered a seven week period (November and December 2001) during which we specifically targeted all community, voluntary and environmental groups operating in the three council areas. In total we identified and wrote to 690 groups informing them of the consultation and asking them to get involved, enclosing a paper outlining the community planning issues to consider and how the Area Plan was relevant to their community.

We also worked closely at that time with the three councils (in particular their community development or community relations officers) and North Antrim Community Network, the umbrella community forum for groups in the area, to identify a number of strategic groups in the Plan area who could attend a series of **information meetings**. These meetings were held in December 2001 and were designed as information exchange sessions. CTA and the Planning Service explained the Area Plan process and encouraged groups to become and remain involved. In return the groups provided comments and views on the main issues and needs of their areas. This information, which was presented in a report to the Planning Service in December 2001, was then used by the Antrim, Ballymena and Larne Area Plan Team in the preparation of the Issues Paper. The hope throughout this stage was that all parties would benefit from listening to each other and would gain an understanding of each other's issues and position in relation to the Area Plan. More importantly communities would gain a sense of ownership of the process and see, through the Issues Paper, the benefit of being involved. We also encouraged groups to submit written comments at this stage. These were included in our report.

Following the preliminary stage and prior to the commencement of the statutory consultation period, we undertook an extensive **community outreach programme** with community groups to engage them more effectively in the consultation. Again these groups were identified in collaboration with the main community network and the councils' relevant officers.

This was an innovative and new approach on our part and resulted from our observations of previous Area Plan consultations that a resources gap exists among many community and voluntary groups.

We contacted and met with 30 groups as part of the outreach programme, explaining the Area Plan process to them, the relevance to their group and/or community and urging them to take the opportunity to become involved in the Area Plan at the statutory consultation stage. The outreach meetings took place from January 2002 to March 2002 and helped to equip these groups with the information needed to input more comprehensively into the Area Plan consultation. The information gathered from the outreach sessions is incorporated into the general and locational findings at Section 4.

During March and April 2002 we conducted a number of **face-to-face interviews** and **postal surveys** with representatives of the nine equality groupings. This was a specific element of the terms of reference and was undertaken to gain an understanding of the impact that planning and the Area Plan has on these groupings. Findings from this stage are reported separately at Section 4 as their responses are not land use specific and did not fit into the general and locational findings section.

During March and April 2002 we also consulted with young people in six schools in the Antrim, Ballymena and Larne area, using **mapping exercises** as the main consultation technique. This section of the population was specifically targeted and included in the process in the knowledge that young people's views are not often heard in typical consultations and that they are unlikely to participate in public meeting style events. Students from both sides of the community in each of the three council areas were involved in this stage. Their views on the Plan have been incorporated, where possible, into Section 4.

Immediately prior to the publication of the Issues Paper and the beginning of the public and community consultation events we promoted and advertised the events widely. To complement the advertisements placed by the Planning Service in local and regional newspapers, CTA issued press releases and bulletins to newspapers and radio stations. In a further attempt to promote the consultation and encourage people to attend the events, leaflets were distributed by CTA staff throughout the Plan area. This sought to enhance and widen public participation in the consultation. Wide distribution of information leaflets also helped to promote the process and provided details of the consultation events. Feedback on the success of this method and others is shown later in this Report.

The traditional consultation (Stage 2) began on 21 May 2002 with the publication of the Antrim, Ballymena and Larne Area Plan Issues Paper. This triggered the statutory 14 week Area Plan consultation period and three weeks of public meetings and drop in sessions organised and facilitated by CTA. Twelve events were held throughout the Plan area during the three weeks from 27 May 2002 to 13 June 2002.

Locations for the public meetings and drop in sessions were chosen in consultation with community groups and councils, taking into account geographical, religious, accessibility, capacity and neutrality considerations as well as choosing locations where major planning issues dominate.

The **public meetings** lasted for two hours and involved brief introductions from CTA and the Planning Service, an open session with questions and comments from participants and a break followed (where possible) by small informal group discussions. By contrast, the **drop in sessions** were held for several hours from late afternoon to early evening to accommodate those members of the public who cannot attend evening meetings.

4. Consultation Findings

Consultation on the Antrim, Ballymena and Larne Area Plan with the public, representatives of equality groups and the community and voluntary sector took place from November 2001 to June 2002. Steps undertaken during this stage included preliminary information gathering with community and voluntary groups in the Plan area; a community outreach programme with lower capacity community groups on the importance of the Plan and the relevance to their communities; structured interviews with representatives of equality groupings and consultation with young people from six schools in the Plan area.

The Issues Paper was published on 21 May 2002 and 12 public and community consultation events ran from 27 May 2002 to 13 June 2002.

Findings from all stages and events in the consultation have been collated and categorised and are reported under the following headings:

- general issues (issues relevant to the whole Plan area);
- locational issues (issues specific to each of the three council areas);
- consultation with equality groupings, including young people;
- community and voluntary groups' written submissions.

The section ends with an evaluation of the consultation events.

4.1 General Issues

• Housing in the Countryside

Many participants said that some rural people find it difficult to obtain planning permission for housing in the countryside while it appears others do not experience the same problems. The needs of the tourist were also said to outweigh the needs of local people.

These participants said that landowners in the green belt or in Countryside Policy Areas cannot obtain planning permission for housing and as a result have to move away which is having a detrimental effect on rural family life, especially among the farming community. Some people asked if existing restrictive planning policies on housing in the countryside could be relaxed.

Current difficulties with housing in the countryside, including the proliferation of dwellings, poor designs and inappropriate houses, was said to be the legacy of past planning decisions and abuse of the system by certain individuals. To correct this situation more effective planning controls and enforcement of planning conditions (especially on design, siting and landscaping) were said to be needed.

Some reference was made to the apparent inconsistency in the Planning Service's assessment of applications for planning permission for housing in restricted areas in the countryside. Again effective enforcement of occupancy conditions was called for.

• Housing Allocation and Growth

The majority of participants said that new housing allocations, as set by the Regional Development Strategy (RDS), should be distributed equitably throughout the Plan area. However, many realised that the availability of services and the principles of sustainable development would have to underpin planning decisions on this issue.

While many people wanted all settlements to grow they urged caution against merging of settlements - each, they said, should keep their own identity.

Many comments were made on this issue. These included:

- New housing should be built where clear local need for housing growth has been identified. Land previously zoned but not used for housing should be re-examined before new allocations are set.
- Realistic boundaries should be drawn around settlements to allow reasonable growth and to enable people to live in their local area - this it was said would take the pressure off other areas.

- The Planning Service must assess current building rates and demographic changes before new housing allocations are decided. The ability of schools to cope must also be examined.
- Land zoned for housing should be released in phases to ensure adequate supplies of housing land are available throughout the Plan period.
- Services (sewage, water and electricity) are already available in many areas, including land in the green belt. Many thus suggested that land in the green belt should be zoned for housing.

- **Affordable Housing**

Although there was little mention of affordable housing, participants did say that the Planning Service could prevent the issue becoming a problem in the Plan area by zoning land for housing which would be developed only for affordable units.

- **Social Housing**

Participants said that when the Plan zones land for social housing, cognisance should be taken of the need for locations which are accessible to the transport system and retailing facilities. This, it was said, would take into account the fact that many occupiers of social housing do not own or have access to a car.

- **Housing Design**

Design of rural housing was often criticised - some referred to seemingly uninhibited ribbon development and how it should be curtailed, others mentioned skyline developments which should be refused.

Overall, sensitive housing designs were asked for with reference made to Penrith in the Lake District where it appears new housing is so well designed and integrated into the landscape that it contributes greatly to the local area.

Many participants queried how the Plan could prevent inappropriate housing development in future and in response called for the Plan to include strong and effective design policies and statements. They also called for the Planning Service to insist on properly designed developments which include green space, landscaping and adequate car parking provision.

- **Other Housing Issues**

Comments on other housing issues included:

- The Plan should encourage new residential developments onto brownfield (previously-used) sites.

- A balance of different house types is needed to accommodate differing needs throughout the Plan area.
- Large housing developments should not be built unless facilities, including shops and transport, are located nearby.
- Local people should be allowed to buy houses in preference to people from outside the area - in effect regulations on residency should be introduced.
- One solution to the perceived problems in the housing market would be to enable the Planning Service to decide on the location of housing, the appropriate scale, density and design that would be acceptable on sites and then issue briefs for these sites to developers.
- Information on current house building figures including planned developments would help communities accurately assess growth and future housing need.

- **Town Centres and Retailing**

In a bid to strengthen the role of town centres participants asked that existing town centre and retailing policies be adhered to. In particular people said that the growth of multi-national stores should be controlled so that small retailers do not suffer. This, it was said, is not a sustainable situation and should not be tolerated in the future.

Zoning of residential land in town centres was suggested as a way of breathing new life into urban centres, particularly as this would establish a 24 hour presence in these areas.

- **Tourism**

Growth in the tourism sector was highlighted as being one of the key needs of the Plan area. This, many said, should be controlled as a proliferation of bed and breakfast and other tourist accommodation was not seen as a sustainable way forward.

Many said that the future of the tourist industry in the Plan area and in Northern Ireland generally lies in integrated development from all agencies involved. A new policy on tourism was said to be urgently needed as was a deregulation of existing tourism policies which many see as being too stringent. Restrictions such as the requirement for providers of tourist accommodation to be registered with the Northern Ireland Tourist Board were said to be inhibiting growth in the sector.

Some reference was made to the need for adequate tourist facilities to attract visitors to key sites. Lough Neagh was singled out as having untapped tourist

potential and participants said that the Plan should recognise this and help facilitate growth in this location.

- **Roads and Transport**

Participants from rural areas were particularly frustrated at the condition of rural roads and the lack of a comprehensive and integrated public transport system to service rural communities.

Many people mentioned the fact that a sizeable percentage of the population do not have access to a car, yet viable alternatives are not there. More affordable private cars and lack of investment in public transport is making the traffic situation in the Plan area worse as more and more people now use the car as a more convenient form of transport.

Some people said that if the Department is serious about reducing the number of cars in town centres in the Plan area then car parking should not be made as available - park'n'ride schemes instead should be introduced and the Area Plan can facilitate this.

It was also said that applications for new housing development in the countryside should be carefully considered given the implications for more rural traffic, very often on third class roads that cannot cope. It was on occasion suggested that housing in the countryside should only be approved where a reasonable public transport system exists to service the population who will live in the new housing.

The condition of many rural roads was said to be worsening with reference made to the dangers many people face when walking and cycling. Tourism was also said to be suffering as a result of this with calls made for more pavements and dedicated cycle routes.

- **Industry and Employment**

Many changes were called for in the way the Area Plan examines and caters for industry and business growth. Participants said that the days of large scale investment in industry are virtually over and it is the accommodation of smaller businesses and people working from home that is needed in today's environment. Farmers especially were said to be in need of assistance with calls made for a relaxation of planning policies to enable agricultural diversification to take place. Small settlements, it was said, are in need of new zonings which will facilitate the emergence of new small businesses.

The need for infrastructural improvements along with these zonings to create the right environment for growth to occur was highlighted. Emphasis was placed on the need to ensure provision of low cost business space, although participants recognised the difficulties the planning system has in ensuring this.

- **Natural Environment**

Participants said that a balance always needs to be struck between allowing development to take place and protecting the natural environment. Comments included:

- Trees and hedges are often cut down and this should be avoided.
- Water courses are being polluted and fish are being killed in large numbers. Water pollution often occurs as a result of an inadequate sewage system.
- Wetlands are important habitats and should never be acceptable as development sites. Similarly flood plain development should be avoided.
- Coastlines were better protected in the past. It now seems that with the growth in tourism their delicate ecosystems are under threat.
- Illegal dumping is a big problem throughout the Plan area - an education and awareness campaign is the best way of tackling this.

- **Built Environment**

There was a lot of discussion on Conservation Areas and how some of them in the Plan area have been detrimentally affected by inappropriate developments and/or the demolition of fine buildings that contributed greatly to the conservation designation. Some participants said that the absence of a specific Planning Policy Statement (PPS) on this issue is a contributory factor and asked if Conservation Areas could be un-designated and redeveloped if damaging developments had occurred. This was not a commonly held view however and one offered as a solution only in extreme circumstances. A greater onus should be placed on property owners to maintain the aesthetic value of their properties, it was said.

The Planning Service should recognise the need to consider the spaces between buildings - these are said to be just as important in the townscape. It was also said that cognisance should be taken of the fact that everything we do impacts upon the environment. The Area Plan, it was said, should refer to this and the need to carefully consider the potential impact of all activities on the built environment.

- **Community Facilities**

Overall comments were made about the need for additional land for community space and facilities in the Plan area. If land is not made available many feared that communities will face difficulties in the future when they realise that the land or space is not there for community development projects.

Participants highlighted the difficulties currently facing councils when trying to develop community facilities because of the high price of land and the competition that exists on the open market.

In terms of the provision and accommodation of recycling facilities and amenity sites, participants asked if the Plan could make it easier for councils to provide these with a policy statement in the Plan referring to suitable locations throughout the three council areas.

- **Recreation and Open Space**

Many comments were made about the need for the Planning Service to ensure that developers provide areas of open space and play space within new housing developments. Making reference to the ten per cent open space requirement proposed in the forthcoming Planning Policy Statement (PPS 8 Open Space, Sport and Recreation), participants said that the problem currently surrounding the issue of who will maintain these spaces could be resolved if a government department agrees to take on this role. Similarities were drawn with the adoption of private roads by the Department for Regional Development.

Many participants stressed the need for open space in all settlements in the Plan area, although some people warned that landowners may be reluctant to release their land for recreational purposes as land zoned for housing development is financially more attractive.

One way of finding appropriate land for recreational use, especially for play areas, was said to exist in housing demolition areas.

- **Infrastructure**

Participants said that new developments frequently go ahead before the necessary infrastructure is in place. The Area Plan should in many people's opinion contain a statement preventing this from happening in future.

General comments were made about the condition of the sewage system in rural areas and the system's inability to take the effluent from new dwellings. The resultant use of septic tanks, often on a large scale, is an inadequate method of dealing with the problem and one which is viewed as untenable in the longer term. Referring to the Water Service's future plans for the Antrim, Ballymena and Larne areas participants asked if sufficient financial resources are available to remedy what many believe to be a wholly unacceptable and unsustainable situation. Without further investment many people warned that settlements will not be able to cope with additional growth.

- **Alternative Energy**

There was some general discussion on the need to consider alternative forms of energy both to provide renewable energy sources and to reduce damage to the environment. One suggestion included construction of a hydro-electric power station along the River Bann. Given the flow of the river at certain locations, people said that the energy generated could match that provided by wind farms.

- **Sustainable Communities**

The need for integrated and balanced communities was often mentioned. Participants highlighted the fact that planning decisions, especially on housing applications, should never be taken in isolation. The inter-relationship between housing, transport, employment, the environment, schools and tourism among other things was said to be vital and that only when these issues are examined and planned for holistically will sustainable and balanced community growth occur.

- **Equality Issues**

On occasion participants referred to their feelings of frustration with the planning system and how it seems to them that developers often receive better treatment than individuals. They said that the issue is essentially one of equity and fair treatment for everyone.

People with disabilities were said to be at a disadvantage when trying to access public amenities and facilities. Some people asked if the Area Plan could help with this.

- **Planning Issues**

Many comments were made about the planning system. Some participants said they experience numerous problems with the existing system, ranging from inconsistencies, a lack of enforcement, need for integrated government policies and the absence of third party rights. Comments included:

- People are cynical about the Area Plan consultation and believe that their views may not be adequately taken into account.
- The accountability of the Planning Service was questioned with some referring to the democratic deficit that they believe exists with the current planning system.
- Greater co-ordination between government departments and agencies was called for with criticism levelled at DRD for not having produced the PPS on the Countryside and the PPS on Housing. These issues were seen as integral to the successful operation of the Area Plan and that without them the Plan will be incomplete.
- The Planning Strategy for Rural Northern Ireland is an outdated document and urgently in need of replacement, particularly on the difficult issue of housing in the countryside.
- The Antrim, Ballymena and Larne Area Plan needs to be co-ordinated with other Area Plans including the Belfast Metropolitan Area Plan.
- Caution was urged when preparing the Plan and its policies to ensure that no ambiguities exist that would enable developers to get planning permission for inappropriate developments.
- The planning system from a development control perspective appears arbitrary in its operation - some people are notified of planning applications under the neighbourhood notification system, others are not.
- Regional planning controls and policies should be interpreted consistently by all divisional planning offices.
- Enforcement of planning conditions must improve - for example regarding the provision of green space and landscaping within housing developments - otherwise planning statements and policies in the Area Plan are ignored and become meaningless. Members of the public see problems occurring and feel frustrated at apparent inconsistencies in approach with different applications.
- Some members of the public feel ill-informed about planning and the operation of the planning system - the Planning Service has an educational role to play in this respect, not just at a strategic level but through the promotion of the Area Plan.

- The public inquiry system is unfair as individuals often do not have the financial resources to obtain the necessary legal representation. This, with the absence of a third party right of appeal means that the system, in many people's opinion, is unfairly biased against the community and in favour of the developer.
- Repeat planning applications were criticised as causing unnecessary delay in the system.
- The Area Plan Team should ensure that environmental appraisals for every settlement are undertaken first so that appropriate amounts of housing, industry and tourism facilities are provided that the settlement can cope with.
- In 1994 the Planning Service issued design guides for Glenarm, Carnlough and Ballymena. These guides were seen by many as valuable and worth re-printing.
- The Planning Service should consider introducing a purchase tax policy to control the rate of development in some locations.
- The fact that there is no VAT payable on new buildings often encourages developers to demolish and rebuild rather than redevelop.
- It appears to be easy to obtain planning permission for septic tanks. However there is a fear that often the slope of the land is not considered during the processing of these applications and as a result the contents of the septic tanks can discharge onto adjoining land.
- There are many barriers to brownfield development at present.
- The Issues Paper was welcomed but the document was criticised for not having enough information. For example some people said that the debate could be widened if questions were posed on the type of development scenarios one can expect in the Plan area - for example town cramming versus greenfield development.
- Details of the Area Plan consultation process were mentioned with some people saying that certain sections of the population will never be encouraged to participate in the process. Farmers for example were said to be more easily reached through the Farmers' Union rather than through direct invites to the consultation meetings.

- **Other Issues**

Some participants said that problems are often encountered with white land as it has no specified use and is sometimes developed for housing. People asked if the Area Plan could ensure that this does not happen in future.

Several participants asked if a policy could be introduced to control the erection of farm sheds as they believe they are unsightly in the open countryside.

Some reference was made to the need to consider zoning land for the development of integrated schools.

The consultation events were generally welcomed but some participants mentioned that the meetings would have been more productive if other government departments had been represented. Often people believed that their queries were non-planning ones yet relevant to the Area Plan and they would have welcomed the relevant agency being in attendance to answer their questions. Again the comments centred on the need for co-ordinated or joined-up government.

4.2 Locational Issues

Antrim Borough Council

• Housing Allocation and Growth

The location of new housing and growth of towns and villages were dominant issues at the meetings throughout the Borough. Comments included:

- In allocating the 7,500 units for the Borough it is important to accurately assess the number of housing units already built since the housing allocation figures were set in 1998.
- New housing in Antrim could possibly be developed along the Randalstown Road, Belfast Road and Ballymena Road. Development should not however be allowed to spread from Antrim to Glengormley.
- In allocating areas for development consideration should be given to Antrim's flood plain.
- The Area Plan should promote Antrim as a desirable place to live and this will help fulfil its role as a 'counter-magnet' to Belfast as outlined in the RDS.
- Crumlin is the fastest growing town in Northern Ireland, possibly even western Europe. It is already past saturation point in terms of new housing and the roads and sewerage infrastructure simply cannot cope. A halt must be put to new housing in Crumlin until the new Plan is adopted.
- The transport, health and social infrastructure of Crumlin need to be improved before further expansion is considered.
- Eleven hectares of undeveloped land still exist in Crumlin under the current Plan meaning that the capacity for 270 new houses still exists. Around 400 new houses have been built in the town since 1998 and approximately 670 houses may therefore be built in Crumlin before the allocations for the town are determined in the new Plan. No more housing is needed.
- If adequate infrastructure was put in place before development the corridor from Nutts Corner to Aldergrove could be developed for housing.
- The development limit of Randalstown should only be extended if the infrastructure is in place to support additional growth.
- The Randalstown development limit should not be extended to the east.
- Any housing in Randalstown should be located close to the Motorway either to the east or west of the town, thereby limiting the effect of traffic on the

town centre. New housing could also be developed along the Staffordstown Road in Randalstown.

- There is demand and potential for new housing in Toomebridge. The completion of the bypass could make more land available for new housing. Because of the river, development could take place by Lough Beg and on the Moneynick Road.
- If development continues on the Bann side of the village the heart of Toomebridge will be pushed to the edge of the settlement.
- The development limit of Dunadry should not be extended as there are not enough services to support further housing growth.
- To avoid the increasing number of housing developments in limited spaces to the rear of existing houses, the development limit in Dunadry should be extended.
- Parkgate and Templepatrick have reached their optimum size. Uncontrolled growth will change the character of these settlements whose services currently cannot cope.
- Grange Corner could accommodate a small number of new houses but growth to the west of the settlement should be avoided.

- **Affordable Housing**

Discussion on the need for affordable housing featured in meetings throughout the Borough with the range of comments referring mainly to locations which are in need of new affordable housing. It was suggested that provision should be made for affordable housing throughout the Antrim Borough and that sites within Antrim town centre should be identified for low cost housing development. Crumlin, Randalstown, Toomebridge, Parkgate, Creggan and Templepatrick were all said to need affordable housing units. Participants highlighted how a recent development approved in Templepatrick included terraced housing suitable for first time buyers and asked if this type of development could be further encouraged.

- **Social Housing**

Many participants believed that there will be a much greater need for social housing in Toomebridge by 2016 and that the area would also benefit from a co-ownership housing scheme. Participants also said that there is a need in Toomebridge for publicly provided sheltered housing and bungalows which are accessible for people with disabilities.

Others mentioned that there are a lot of vacant social houses in Greystone and Springfarm and that these areas have adequate social housing provision. Ballycraigy however does need more social housing.

- **Apartments and Second Homes**

The issue of apartments and second homes was rarely mentioned at the Antrim meetings. However some participants said there is a market for new apartment developments in both Antrim and Randalstown.

- **Housing Design**

Participants called for new developments in Toomebridge to be of low density and in keeping with the character of the local area.

- **Other Housing Issues**

Other housing issues in the Antrim Borough included:

- The Lignite Policy Area close to Crumlin is so restrictive that people are often unable to build there.
- Derelict housing should be re-used in the Randalstown area.
- If Toomebridge is further developed as a commuter settlement the community structure will decline as more people work and socialise in other places.
- Toomebridge and Randalstown need a range of house types including housing for older people.
- The Plan should ensure that the rural character of Caddy is retained.
- There is a need for accommodation for older people in the Stiles estate.
- Any additional housing in the Stiles area of Antrim should be accompanied by community facilities and services.
- Participants questioned the merit of the Clanadry development when other 'manufactured' communities have been proven not to work.
- Residents from many of the public housing estates in Antrim feel isolated from the rest of the town and socially excluded as a result.

- **Town Centres and Retailing**

Much of the debate focused on the need to regenerate Antrim's town centre. Participants suggested that the Plan should try to establish a retail core in

Antrim similar to that in Ballymena and that more housing in the town centre may help to bring vitality to the area. Perceived problems were seen to be the lack of suitable retail facilities, the fact that Antrim town centre culminates in a dead end and the unsuccessful pedestrianisation of the area. Participants were in favour of improving the commercial area of the town to cater for the growing population.

Residents in Toomebridge were keen to see commercial development on land currently zoned for housing within the village centre. It was argued this would create a balance that would help to retain the existing centre.

- **Tourism**

Several views were expressed on the issue of tourism in the Antrim Borough. These included:

- The Department should consult with the Bann Corridor Consultative Group and the Lough Neagh Advisory Committee in preparing the Area Plan.
- Land between the Antrim Forum and Lough Neagh should be developed for tourism.
- Antrim town needs a new hotel.
- In Randalstown a tourist trail could be developed linking the three raths south of the town.
- Toomebridge has increasing tourism potential. The canal and land beside the river could be developed for tourism.
- The Plan should support and encourage tourism development within Creggan and consider the introduction of a cycle path through the settlement.

- **Roads and Transport**

The majority of people who took part in the consultation expressed strong views on the problems associated with road maintenance, the lack of public transport services and the growing level of traffic on local roads. Concern was often expressed over the limiting effects these problems have on the future development of the Borough. Comments included:

- The lack of car parking facilities and public transport services in Antrim town hinders people's ability to use it as their local shopping centre. It was suggested that the Plan should identify land for a new car park. Furthermore the existing bus service in Antrim is so costly residents from local estates rely heavily on private taxis.

- The Ballycraigy estate is poorly serviced by public transport and a Flexibus service is needed for the estate.
- The Knockmore railway line should be kept open and greater use of it should be encouraged.
- Glenavy railway station should be safeguarded to allow for the planning of future improvements to lines and stations.
- The roads in and around Crumlin cannot sustain the current level of traffic. The proposed housing developments on Ballydonaghy Road and in Glenavy will exacerbate this problem.
- Crumlin needs a car park in the town centre.
- The railway is important for the future development of Crumlin.
- Randalstown needs a new road from the Motorway skirting the western edge of the current development limit towards Portglenone to ease traffic congestion in the town at peak times.
- A one-way system similar to the one in Toomebridge may be beneficial in Randalstown and improve traffic flow and ease congestion, especially along Bridge Street.
- There should be a car park beside the embankment or behind John Street in Randalstown to accommodate shoppers.
- The junction of Moneynick Road and the Motorway in Randalstown is dangerous.
- There should be more 'park and share a lift' facilities near the Motorway to accommodate commuters from Randalstown. It could also ease the problem of commuter parking in Randalstown town centre.
- Local people and tourists would benefit from a footpath and cycle path from Randalstown town centre to Randalstown Forest and a footpath along Portglenone Road in Randalstown.
- The road through Templepatrick out to the International Airport needs to be upgraded.
- There is a need for more car parking facilities at the Airport.
- The Protected Route status should be removed from the Moneynick Road when the Toome bypass is completed.
- The poor road network around Toomebridge has stifled economic growth.

- There should be an integrated approach to development and transport to cater for the needs of residents in Toomebridge who do not have access to a car.
- There is a school bus from Toomebridge to Ballymena but no public transport. There is a need for a public transport service especially between 9.00 am and 12 noon.
- There is a need for car parking in Toomebridge and this need will become more acute when the bypass opens.
- There are fears that the Toome bypass will direct people away from the village and will have a negative impact both socially and economically.
- Young people in Toomebridge cannot access employment or training opportunities because of the lack of public transport.
- Speeding traffic is a problem in Toomebridge. A speed limit of 30 miles per hour should therefore be introduced on Roguery Road.
- Public transport servicing the small settlement of Caddy is inadequate. The use of a small Flexibus would be beneficial to residents and more efficient to run.
- The roads around Creggan need to be upgraded to sustain the number of heavy goods vehicles travelling through the area.

- **Industry and Employment**

The need for the Plan to facilitate local employment opportunities was highlighted on several occasions. Issues included:

- New industrial development should be located at the former Enkalon site in Antrim and the Plan should seek to facilitate the upgrading of facilities at the Technology Park in the town.
- There is a need for local employment opportunities in the Creggan area.
- Development within the Airport boundary would help to create more employment opportunities within Antrim.
- There is a need for some light industrial zoning in Randalstown.
- Nutts Corner is an ideal location for industrial development.
- There is a need for local employment opportunities in Toomebridge. Small business units should be encouraged in the village.

- **Natural Environment**

Participants wanted the new Plan to actively protect the natural environment and wildlife habitats throughout the Antrim Borough. Comments included:

- There is a serious problem with waste and pollution within the Antrim Borough.
- Land around Lough Neagh should be protected from development.
- The flood plain of the Sixmilewater in Antrim needs to be recognised as a wildlife corridor and afforded greater protection.
- The orchard area close to the Steeple Industrial Estate in Antrim should be protected from development.
- The large area of land around Shane's Castle should be retained as an environmental area.
- Any development of the land between Seacash Road at Aldergrove and the railway line would have a detrimental impact on the established wildlife there.
- Green belts in Crumlin and the Nutts Corner area need to be much better protected by the Area Plan.
- Crumlin River and Crumlin Glen should be protected through the Area Plan process.

- **Built Environment**

Participants urged the Planning Service to protect areas of character and buildings of historical interest. It was suggested that the Plan should preserve the character of Randalstown and that the clock tower in Crumlin should be better protected.

- **Community Facilities**

The need for new or improved community facilities in specific parts of the Borough was discussed at several meetings. Comments included:

- If Crumlin continues to grow it will soon need two new primary schools and a new secondary school.
- There are not enough green spaces, play areas and recreational facilities in Crumlin. Even if facilities are developed in the next ten years it will be too late because hundreds of young people will have missed out. Social infrastructure is needed now. Until this situation changes, an evening bus

service to the Antrim Forum should be provided several nights a week for young people.

- There are very few play facilities within the Antrim Borough as a whole. Randalstown, Parkgate, Toomebridge and Ballycraigy were highlighted as particular areas in need of such facilities.
- The Greystone area of Antrim needs improved community facilities especially for young people.

- **Recreation and Open Space**

The Planning Service was urged to zone more land throughout the Borough for recreational facilities, open space and walkways. Specific suggestions included the following:

- New recreational facilities are needed on the shores of Lough Neagh.
- If Nutts Corner is to be developed, land should be set aside for recreational use.
- The open space beside The Meadows in Randalstown should be retained. Land south of the town centre between the existing development limit and the river should be zoned for sport, leisure and open space. It was also suggested that a pathway could be created along the River Main in Randalstown.
- Recreational facilities are needed in Crumlin. The site at the edge of Orchard Road in Crumlin should be zoned for recreational use and not housing, and the open space west of Weavers Meadow could be made into an urban park.
- There is a need for play areas in the Rathenraw estate.

- **Infrastructure**

Residents in Crumlin expressed concern over the urgent need to upgrade infrastructure in the town. The infrastructure in Toomebridge and Caddy was also said to be poor.

Participants were keen to see infrastructure improvements in settlements prior to new developments taking place.

Several participants were opposed to the creation of the proposed Clanadry Village development because, in their opinion, it will put additional pressures on the roads and sewerage infrastructure.

- **Sustainable Communities**

Residents in Toomebridge hoped the Area Plan will help regenerate the community as well as commercial and retail facilities. Crumlin residents were worried that although the population of the town has grown significantly, local services and facilities have not kept pace with that growth.

- **The Planning System**

Participants raised issues on a number of occasions that related to the planning system and planning processes. These included:

- The Planning Service does not adequately take into account people's views in Randalstown when assessing planning applications.
- There is concern over the number of houses that have been built in Toomebridge without planning permission.
- Participants want to be consulted about future developments in the Lignite Policy Area in Crumlin.

- **Other Issues**

- The new Plan should have a policy to control the current proliferation of signage and advertisement boards across the Borough.
- There should be no more lignite development south east of Crumlin.
- An opportunity site exists at Randalstown High School.

Ballymena Borough Council

• Housing Allocation and Growth

Participants frequently queried housing allocations set by the RDS and asked how new housing would be distributed across the Borough.

Many comments were made about the potential for growth within settlements and where new housing land could be zoned. Comments included:

- The housing allocation figure of 5,900 units for the Borough is too low and should be reviewed before the Draft Plan is published.
- New housing areas in Ballymena could be identified at: land east of the ring road near the Ecos Centre; land west of Ballymena; the Galgorm area; Harryville; and land along the Larne Road towards the M2.
- The religious make up of new housing areas in Ballymena is impacting on local school populations. Catholic schools (such as St Joseph's Primary School) do not have enough new pupils and new developments, for example at Tullygarley, are perceived as Protestant. If new housing was permitted in the green belt area to the north of the town St Joseph's School and others nearby would become more sustainable.
- Cargan and Martinstown are almost at saturation point in terms of new housing and additional growth in this market should be strictly controlled. By contrast the nearby settlement of Newtowncrommelin needs new housing.
- Flood plains in Martinstown should not be developed for housing as the river there is prone to flooding.
- The Cullybackey development limit should be extended to the north and east of the town, using brownfield land in particular, and into the green belt if necessary. However there should be no further housing development until the roads are upgraded.
- The development limit in Ahoghill should be extended to the north of the village and to the south of New Road.
- Kells and Connor could sustain more housing development but road improvements and upgrading are required first.
- The development limit in Gracehill should not be extended as recent developments just outside the village are compromising its character and new housing is not needed in the village.
- There is a high demand for new housing in Portglenone and the development limit should be extended. The green belt for example could shift on the

Derry/Londonderry side of Portglenone to accommodate future growth. Local people would like to see more development but urged caution over settlements merging.

- **Affordable Housing**

Some mention was made of the need for affordable housing, especially starter homes and homes for families, within the Ballymena Borough.

- **Social Housing**

When asked about the need for social housing in the Borough, several participants said that they are unsure of future need without having adequate information on existing need and housing waiting list information for the Borough. They said that the Issues Paper should have provided information on issues like this to accurately inform the debate. Participants at the outreach session did say however that Ballykeel is in need of social housing units for families in particular.

- **Housing Design**

Participants mentioned that housing design should be more strictly controlled and the Area Plan could include design statements or policies to assist with this issue.

There was concern about the construction of housing developments in Martinstown without adequate car parking for each unit. Participants asked if this could be remedied in future.

- **Other Housing Issues**

Several comments were made about housing which do not fit into the above categories. These included:

- There is a need for housing choice in Martinstown to suit all sections of the population, especially fold type housing for older people.
- The A42 is a Protected Route and landowners find it difficult to obtain planning permission to build houses along it.
- Portglenone needs a choice of house types and tenure to achieve a balanced community - accommodation for older people, families and young people is particularly required.
- The green belt and Countryside Policy Area boundaries between Ahoghill and Portglenone should not be extended.
- Cullybackey and Ballykeel need family housing.

- Kells and Connor need sheltered accommodation for older people.
- Moorfields should be designated as a small settlement.

- **Town Centres and Retailing**

The Area Plan Team was urged to exercise caution when zoning retail space for Ballymena town and to ensure that the character of the town centre is not further damaged. Comments on retailing in Ballymena town included:

- Larger retail stores in Ballymena town are thriving but small independent stores are struggling to survive the competition from multi-national companies.
- The Fairhill Shopping Centre, especially the car park, should not be further extended.
- Retail expansion should be controlled and restricted until adequate provision is made for parking. Congestion is currently a serious problem in the town and further retail growth would be unwise until this issue is resolved.
- Wellington Street should be pedestrianised but Church Street and Bryan Street should remain open for vehicular use.
- Ballymena town centre is in need of some revitalisation and out-of-town retail developments have been hampering growth in the town's retail area. One participant did mention however that there may be potential for an out-of-town retail development referring to the success of Sprucefield and how it had not adversely impacted on Lisburn town centre.

Several comments were made on the topic of retailing in areas outside the Borough town. These included:

- Retail zonings in Kells and Connor in the past were too generous. This land remains undeveloped and should not be re-zoned in the new Plan.
- Opportunity exists for retail development in Portglenone on a vacant site beside the Post Office and a site next to the Orange Hall. Zoning and redevelopment of these sites and others could help regenerate Portglenone. The village once thrived and needs the Area Plan's help to grow and re-establish itself.
- Additional car parking and retail space is needed in Cullybackey.
- There is opportunity for retail development in the Diamond area in Ahoghill.

- **Tourism**

Many locations in the Borough were said to be in need of growth in the tourist market. Comments included:

- There is a need for provision of tourist accommodation "off the beaten track" and outside the traditional locations for tourist facilities.
- The Issues Paper refers to the potential for a "Destination Resort." This could include the construction of a theme park in Ballymena perhaps on land bounded by the M2, the Broughshane Road and the Devenagh Burn.
- Martinstown has untapped tourism potential in light of its strategic location en route to the Glens of Antrim.
- The Newferry area has potential for growth in the boating tourist market. There are some facilities there at present but expansion is needed.
- Portglenone has been almost forgotten from a tourism perspective.
- Tourism in coastal areas has been encouraged to the detriment of villages such as Portglenone.
- Portglenone could benefit from better links from the village centre to the marina, improved river walks (including lighting), a new hotel site and development of the Plantation site which runs into the Bann on both the Bellaghy and Portglenone sides.

- **Roads and Transport**

Numerous comments on roads and transport were made at most consultation events. These included:

- Portglenone cannot cope with additional housing and traffic until the car parking problem is resolved. A new car park would ease congestion in the village and allow businesses to grow and prosper. Retailers and other businesses need a car park for customers particularly as a lot of commuters use existing car parking spaces for most of the day. A local survey showed that almost half of the spaces in the village are used by cars parked for six hours or more. Participants suggested that land to the rear of Brady's shop would be a suitable location for a car park.
- Public transportation provision in Portglenone is poor and the roads infrastructure is weak.
- The bridge in Portglenone is narrow and dangerous for pedestrians - a new footbridge over the river is therefore needed.

- There are problems with speeding traffic through Martinstown and Cargan and since new housing developments have been developed this has led to increased traffic levels. Footpaths and cycling facilities are needed in these areas for the resident population.
- Martinstown is poorly served by the public transport system.
- A cycle lane should be developed along the Cushendall line from Ballymena to Cargan.
- Main Street in Cullybackey needs widened to ease congestion and to allow for more car parking facilities. Some participants favoured a bypass to ease congestion around the primary school. Dedicated cycle paths would also be a welcome development in the village.
- Ahoghill needs a car park and this could be developed south of Fourtowns Primary School.
- Ahoghill could benefit from improved traffic flows in the Diamond area, possibly a bypass to the south of the village and increased public transport provision.
- Public transport services to and from Kells and Connor are quite restricted and should be enhanced. The road network and the condition of roads in the village are urgently in need of upgrading and there is a need for a new roundabout at the junction between Greenfield Road and Fernisky Road.

- **Industry and Employment**

Participants often mentioned the need for additional land for industrial and employment use. Comments related to various locations throughout the Borough. Those relating to Ballymena included:

- Ballymena needs small business units especially in peripheral locations.
- Ballymena has lost a lot of industrial space especially with the demolition and replacement of the Old Mill in Bridge Street and Phoenix Mill in Railway Street. These losses have resulted in a shortage of industrial land and a lack of opportunities for small business growth.
- It appears that large employers, including inward investors, are accommodated and catered for in the Ballymena area but small local businesses are not.
- Ballymena needs adequate roads and infrastructure if industrial growth is to occur.

- Recent road improvements in Moneyglass and the Grange area should mean that industrial growth can be facilitated and encouraged by the Area Plan.
- Ballykeel industrial site has potential for further development.
- Land opposite Galgorm Industrial Estate could be zoned for small business use.

Comments relating to other locations in the Borough included:

- There is a need for small business units and community business space in Martinstown particularly for farm diversification projects. The old livestock market in Martinstown is one possible location for an industrial zoning. The old car showroom site is another opportunity site.
- IT developments need to be encouraged in the Martinstown area as this will create the ideal environment for many businesses.
- Portglenone needs industrial space for small business units - land between Riverdale Park and the Gortgole Road has the potential to accommodate this.
- Kells and Connor would benefit from a small scale industrial or business unit zoning.

More generally participants said that industrial estates like Craigstown should not be permitted in the countryside or green belt areas. Previously-used farm buildings were also mentioned as suitable locations for "cottage industries" and small business start-up units.

- **Natural Environment**

Overall many participants mentioned the need to protect the natural environment in the Borough. Comments included:

- The Braid River in Ballymena should be better protected.
- The section of the Bann flowing through Portglenone should be carefully managed and enhanced. Recent developments along this stretch of the river have resulted in the loss of one and a half miles of greenery and important natural habitat.
- The river in Martinstown is badly polluted especially from sewage effluent. It therefore cannot cope with additional pressure caused by more housing development.
- Green spaces in and around Gracehill should be preserved.

- Many housing developments (including single houses) outside Cullybackey have individual septic tanks and leakage from them into local streams is causing environmental damage.
- Flood plain development near the River Main in Cullybackey should not be allowed.
- Trees should not be removed to accommodate developments. Some reference was made to the unwelcome removal of trees to accommodate the development of a basketball pitch adjacent to the People's Park in Ballymena.

- **Built Environment**

Comments made on the need to protect the built environment in the Borough included:

- Churchfield House in Portglenone should be protected.
- Castle ruins in Clogh should be protected from development.
- Renovation of properties in Gracehill Conservation Area should be undertaken sensitively in recognition of its Moravian settlement status and historic significance.

- **Community Facilities**

Comments made on the need for community facilities throughout the Borough included:

- Waste and recycling sites are required throughout the Borough.
- Community facilities in Martinstown, Cargan and Newtowncrommelin have not kept pace with the level of housing growth.
- Cargan has no shop or post office. Newtowncrommelin has no play area and Martinstown needs recycling facilities.
- Community and leisure facilities in Clogh need improvement.

- **Recreation and Open Space**

The issues raised on the need for recreation and open space were:

- The People's Park could benefit from expansion and the provision of more recreational facilities for young people, including a skate board park.
- There are limited facilities for young people in Portglenone particularly for sport and play.

- Young people in Cullybackey need more recreational facilities.

- **Infrastructure**

Mention was made at one meeting of the fact that there has been limited consultation on the proposed North-West gas line which will run from Carrickfergus to Derry/Londonderry.

The sewerage facilities in Ballymena, it was said, are in need of substantial improvement as are those at Gracehill.

- **Alternative Energy**

Participants asked if the Area Plan could examine and promote ways of reducing the amount of fossil fuels used throughout the Plan area.

- **Sustainable Communities**

On a general point some reference was made to the need to ensure that communities are sustainable. Many recent developments it was said have had detrimental effects on the structure of many communities.

Specific reference was made to developments on the outskirts of Ballymena town (such as that at the Rosses) which are discouraging people from living in the town centre and therefore contributing to the deterioration of the life and vibrancy of the town centre. Mill Street and Linenhall Street in the town were highlighted as being in need of special attention. Housing and apartment developments in these areas were offered as solutions to this problem.

- **Planning Issues**

Participants queried if the Planning Service can check if land is available in the Borough for development before it is zoned in the Area Plan.

One query was raised about planning permission granted for a two-storey housing development on the open face of the valley in Portglenone. It seems unfair, participants said, to have granted this planning permission when others have been refused. It was said that policy within the new Area Plan should be strictly adhered to so that this does not happen in future.

The River Bann in Portglenone was said to divide the townland but not the community and the Area Plan should therefore consider the proximity of the village to other settlements in the Magherafelt Area Plan boundary.

- **Other Issues**

Comments were often made which did not directly relate to the Area Plan. These have been noted below.

- There is a litter problem in Portglenone.
- There is some concern that Newtowncrommelin does not appear on the Issues Paper map.
- Some residents from Cullybackey are disappointed that their village receives no specific mention in the Issues Paper.
- Residents in Cullybackey want the village development limit extended to accommodate the construction of a new church to the south of the village.
- Existing zonings in Kells and Connor have not been adhered to.
- Residents do not want access from Grangegorm Drive into a new housing development along the Grange Road in Ballymena.

Larne Borough Council

• Housing Allocation and Growth

Wide-ranging comments were made on the subject of housing growth and distribution. These included:

- There is concern over the apparent over-zoning of land in the existing Larne Area Plan 2010 and a suggestion to reduce some of these zonings in the Antrim, Ballymena and Larne Area Plan 2016.
- Participants asked how many dwellings had been built since the RDS housing allocation figures were set in 1998 and how this would impact on future housing allocation in Larne.
- Larne could sustain further growth but it should be of an appropriate scale and design. The re-use of brownfield sites should be encouraged.
- Ribbon development should be controlled to prevent the villages surrounding Larne such as Millbrook from being incorporated into its development limit.
- There is concern over ribbon development on the Largy Road in Carnlough.
- Development limits in Larne and Ballycarry should only be extended after careful consideration of the impact that this could have on local communities.
- Carnlough needs high density, low cost housing. There has been very little new housing development in the area in the last three years and to accommodate growth the development limit needs to be extended.
- Derelict buildings in Glenarm's Conservation Area should be renovated for new housing.
- It was suggested that the development limit around Glenarm could be extended to the south east along Spring Hill to encourage future development in the village.
- There should be no more development in Ballygally or Gleno.
- The development limit in Feystown should be extended to the south of St Mary's Chapel to accommodate further growth.
- Concern was expressed that land zoned for housing in Cairncastle in the previous Plan may never be released for development.
- It was suggested that the development limit of Cairncastle should be extended to the north west of the settlement along the Drumnagreagh Road to

accommodate future growth. Some participants however said that the development limit of Cairncastle should not be extended.

- No more housing developments should be permitted in Islandmagee or Mullaghboy as this would not be sustainable in terms of physical or social infrastructure.

- **Affordable Housing**

Reference was made to the fact that local people have difficulty buying affordable houses especially in Carnlough and Glenarm.

- **Social Housing**

Participants discussed the issue of social housing and were concerned that it was not specifically mentioned in the Issues Paper. A number of people suggested that there is a need for social housing in Glenarm.

- **Apartments and Second Homes**

The problems associated with apartments and second homes were discussed at some of the meetings and related mainly to coastal areas within the Borough. Comments included:

- Apartment development should not be permitted along coastal areas.
- There are already too many apartments and second homes in Glenarm. This has resulted in inflated house prices.
- The high number of new apartment developments in Larne needs to be controlled.

- **Housing Design**

A number of participants made comments on the design of recent housing developments. Often these comments reflected a frustration over the changing character of areas considered to be worthy of conservation. Comments included:

- Future development in Gleno should be in keeping with the existing character of this small settlement.
- The Plan needs to introduce stricter design policies in Islandmagee to ensure the unique character of settlements such as Millbay and Brown's Bay are retained.
- Recent developments in Glenarm were considered to be too dense and therefore out of character - the new dwellings at Mark Street were cited as an

example of this. Local people stated that they need new houses but stressed that they should reflect the character of the existing housing.

- **Other Housing Issues**

Reference was made at a number of meetings to other housing issues. These included:

- A number of people queried if the Planning Service is aware of how much land in Larne had been bought by developers and is as yet undeveloped.
- The Plan should encourage the renovation of vacant properties in Craighyhill and Antiville before considering applications for new build.
- There is a need for fold type housing accommodation in Carnlough.
- There are fears regarding the fact that despite recent flooding in Islandmagee new developments are still being approved on flood plains.
- There should be a policy in the new Area Plan which would favour single dwellings in Islandmagee rather than inappropriate groups of houses.

- **Town Centres and Retailing**

Issues raised on the subject of town centres and retailing related to Larne town. Participants had a number of suggestions on how the Area Plan could help to regenerate and revitalise the Borough town. Comments included:

- The Area Plan should have a comprehensive set of policies for Larne town. In the past development has always been piecemeal.
- The Plan should identify a retail core in Larne and encourage more retail development.
- The Plan will probably encourage growth in Larne but the town centre has declined to the extent that no new modern retail stores will locate there. This will not encourage more people to move to the town.
- The lack of car parking in Larne town centre is a problem.
- Refuse collection in Larne town centre causes congestion. Refuse collections and trade deliveries should be restricted to evening times.
- The pedestrianisation scheme in Dunluce Street in Larne should be enforced.
- The bandstand at Broadway has had a negative impact in the town centre as it has impeded vehicular access.

- Encouraging people to live over shops would bring life and vibrancy to Larne's town centre.

- **Tourism**

A number of tourism issues were raised during the consultation meetings regarding future potential development in the Larne area. It was acknowledged that Larne is at the southern edge of the Glens of Antrim, an important tourist attraction and that it is also close enough to Belfast to be a desirable tourist destination for day trips. It was stressed therefore that the Area Plan should have strong policies to ensure that people are attracted to the area but that overdevelopment of its natural assets does not spoil the environment that visitors have come to enjoy. Other comments included:

- Larne is a tourist gateway which should be made more attractive for visitors.
- Small farms, especially in the Carnlough area, should be able to tap into the tourism market and the planning system should enable them to diversify.
- Car parks are necessary but should not be allowed to spoil areas of high scenic value such as Carnlough and Glenarm. The new car park at the marina in Glenarm should cater for people with disabilities. Another car park should be provided in Glenarm Quarry.
- All tourism developments in Glenarm should be supported and encouraged.
- Magheramorne Quarry should be re-developed as a tourist facility.
- Referring to the Issues Paper, participants questioned what the Planning Service meant by 'Destination Resort' and asked if this concept could apply in Islandmagee.
- There is concern that the recent housing developments in Islandmagee may negatively impact on future tourist developments.
- Brown's Bay was highlighted as a valuable tourist asset which must be protected.
- Carnfunnock Country Park should be promoted more widely.

- **Roads and Transport**

There were a number of suggestions made for improving the road and rail network and easing congestion. Comments included:

- Public transport should be improved around Larne to reduce dependency on the private car.

- There is congestion at the bottleneck at High Street in Larne.
- The one-way system in Larne's Main Street should be re-organised as it currently directs traffic away from Larne and towards Belfast or Ballymena.
- The improvement of the A8 should be treated as a priority. Careful consideration must be given to how traffic will cross this busy road as safety issues are paramount.
- The train service to Larne should be more frequent.
- Freight transport would benefit from having access to an efficient rail network.
- There should be no more development in Larne until the poor road network is upgraded.
- Roundabouts recently introduced on Linn Road in Larne to ease congestion are having an adverse affect on traffic.
- The B148 through Cairncastle is an important route with a high level of traffic - the Plan should acknowledge this and upgrade its status.
- Speeding traffic is a problem in Cairncastle. To increase pedestrian safety there should be footpath and lighting improvements throughout the settlement.
- The parking bays along Sallagh Road in Cairncastle should be improved to encourage use by tourists.
- Public transport in Carnlough and Glenarm is poor.
- There is a need for improved car parking facilities in Carnlough.

- **Industry and Employment**

The problems associated with accessing jobs and creating employment opportunities were discussed at a number of meetings. Comments included:

- Although agriculture is declining it is still an important local industry and the Plan should facilitate its growth and development.
- The industrial zonings in the Larne Area Plan 2010 are welcomed but without road improvements industrial development will be limited.
- Larne is a commuter town. It needs employment opportunities to create a more balanced community.

- There is no space in Larne for the development of a large industry.
- Approximately 80 acres of the Portland industrial site in Larne have not yet been developed. This area should be developed before any further industrial land is zoned.
- The former Magheramore Quarry should be used for industrial development.
- A number of sites along Ballyhampton Road in Larne would be suitable for industrial development but the roads cannot sustain the level of traffic associated with such developments.
- There is a need for local employment opportunities in Glenarm and land should therefore be identified in the Plan for industrial development.

- **Natural Environment**

A wide range of issues concerning the natural environment was raised by participants. Comments made illustrated their concern over achieving a balance between development and protection and included:

- Areas in Larne Borough currently under restrictive policies should not be changed.
- The coastal path around Larne Lough should be protected and the Lough itself should be designated as a Local Landscape Policy Area.
- The Inver River in Larne should be improved and walkways along it developed.
- The green belt around Larne should not be encroached by development.
- The shoreline in Glenarm should be protected. If it is spoiled by inappropriate developments, such as apartments, tourists will not be attracted to the area. The Glens of Antrim have such potential but apartment developments continue to spoil them.
- Glenarm Quarry is despoiling one of the nine Glens of Antrim. Although the quarry provides jobs, in the long term its negative impact on the environment will cause more harm than would have resulted from re-use or renovation for tourism developments.
- Countryside policies are supposed to protect the rural environment but this has not been the case in Islandmagee.

- **Built Environment**

A number of issues were highlighted during the consultation meetings by people who are concerned about the changing character of old established environments and conservation areas. Comments included:

- There are concerns over recent developments at Larne Harbour and potential future developments. Current zonings in the area are not appropriate.
- The Fleet Hotel, First Larne Church and the former Moyle Hospital should be protected.
- Glenarm Conservation Area has been spoiled by recent developments. It is easier to obtain planning permission in the Conservation Area than outside it.
- Development within Carnlough Conservation Area needs to be carefully controlled.
- Gleno should be protected from inappropriate developments especially at the historic sites of Gabbins Fort and Kilnside.
- Raloo should be designated as a Conservation Area.

- **Community Facilities**

A number of problems associated with accessing a variety of community facilities were discussed at the consultation meetings. Comments included:

- There is a need for recycling sites throughout the Larne Borough.
- There is a need for further education facilities in Larne especially since the closure of Larne College of Further and Higher Education.
- Larne, especially the Craigyhill and Antiville areas, and Glenarm would benefit from a range of community facilities. Craigyhill has a population of approximately 2,000 people yet no play facilities. A play area could be developed near the quarry in Glenarm.
- Carnlough would benefit from a recycling facility but often the Area of Outstanding Natural Beauty (AONB) policies are too restrictive for this type of development.

- **Recreation and Open Space**

Participants said there is a need for general improvements in the type and standard of recreational facilities and open space throughout the Borough. Comments included:

- More land should be zoned within Larne town for recreation and open space. A site at Curran Point had been zoned in the Larne Area Plan 2010 for recreation and open space but it appears that this could be re-zoned for industrial use as part of the harbour development.
- There is a lack of both indoor and outdoor recreational facilities for local people and tourists in Carnlough. The harbour provides only a limited attraction. Land adjacent to the community centre has the potential for recreational developments.
- Land should be zoned for recreation and sport in Craigyhill and Antiville.
- Ramore Green in Larne should be zoned as recreational and open space land.
- Carnlough would benefit from a walking and jogging route.

- **Infrastructure**

Participants urged that new developments should not take place throughout the Borough before improvements to the water and sewage systems have been carried out. This problem was considered to be acute in Islandmagee.

- **The Planning System**

On a number of occasions participants asked questions and raised issues which related to the planning system and processes rather than a specific topic in the Area Plan. Their comments included:

- Participants queried how this Plan would replace or reflect policies within the existing Larne Area Plan 2010.
- Residents in Islandmagee are aggrieved that the interconnector was approved when current policy aims to preserve the natural environment.
- People in Larne called for an assurance that existing planning policies will not be breached in the future.

- **Other Issues**

Other issues raised at the meetings included:

- The land to the east of the cemetery in Larne and adjacent to the cemetery in Kilwaughter should be protected and zoned to allow for further expansion in the future.
- There is concern over the development of farm buildings in Cairncastle.
- Illegal dumping is perceived to be a serious problem in Larne.

4.3 Consultation with Equality Groupings and Young People

Equality Groupings

Introduction

The Planning Service, like all public authorities, is required under the provisions of Section 75 of the Northern Ireland Act 1998 to have due regard to the need to promote equality of opportunity between persons of different religious belief, political opinions, racial groups, age, marital status or sexual orientation; between men and women generally; between persons with a disability and persons without and between persons with dependents and persons without. In addition the Planning Service is required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial groups.

In order to ensure that these groups were adequately represented during the Area Plan consultation CTA organised a half-day seminar and invited 24 groups to attend. However the level of interest was low resulting in the cancellation of the seminar. CTA instead contacted representatives of the 24 groups through face-to-face interviews and postal surveys. Few of the equality groups were aware that the Antrim, Ballymena and Larne Area Plan was being prepared. They did however highlight that the policies contained in the Plan will impact and have an effect on the grouping that they represent and there were calls for better opportunities to inform the decision-making process. Comments of the groups who chose to take part in the consultation process follow.

- **Northern Ireland Council for Ethnic Minorities (NICEM)**

The work of NICEM includes representing the views of people from and promoting equality between minority ethnic groups. NICEM was critical of the way Area Plan consultations are advertised in newspapers through press releases and public notices as this was considered to limit the input of minority ethnic groups to the processes and the shaping of planning policies. Reference was also made to how Area Plan policies can affect people's abilities to access services and housing. NICEM stressed the need to deal with the issue of Traveller accommodation and suggested that the provision of transit and permanent sites should be considered in a holistic way with the full involvement of the Traveller community.

Looking forward, NICEM hoped that the Planning Service would consult minority ethnic groups in each area for their views on their individual needs. It welcomed the opportunity to be consulted as a representative body but urged statutory bodies and government departments to provide capacity building programmes for local minority ethnic groups to enable them to become involved in the process. NICEM suggested that the Planning Service should refer to other documents (such as the Equality Commission's Draft Code of Practice for Racial Equality in Housing and Accommodation) when policies are being formulated which will impact on minority ethnic groups.

NICEM urged the Planning Service to carry out its own Equality Impact Assessments rather than contracting this out to consultants so that staff will become experienced in the process. It also suggested that an Equality Impact Assessment should be carried out at the Issues Paper stage in the Area Plan process rather than at the Draft Plan stage so that the assessment will be carried out as the policies are being formulated and not when they are already set.

- **Gingerbread**

Gingerbread is an organisation which offers practical and emotional support for lone parents across Northern Ireland.

Gingerbread said it would expect the Area Plan to have policies which create opportunities for excluded groups including lone parents, and more particularly policies which affect the provision of play areas, access to employment and adequate childcare facilities and the standard of housing.

Gingerbread considered that the Area Plan should tackle the issue of social exclusion and isolation. It said Plan policies should aim to create places where lone parent families can come together in a safe and comfortable environment. These include play areas, leisure centres, community buildings - all of which could be used by lone parent families. Gingerbread acknowledged however that all of these facilities will only be accessible if there is an adequate public transport network.

- **Equality Commission**

The primary function of the Equality Commission is to ensure the effective implementation of Section 75 of the Northern Ireland Act 1998. This will result in equality issues becoming mainstreamed in the decision-making process. There were a number of issues which the Commission suggested that the Planning Service should consider when preparing the Antrim, Ballymena and Larne Area Plan:

- It should assess how the planning policies will impact on residential, commercial and employment activities and assess how these functions will impact on each other.
- The Area Plan will have to consider both the settled and Traveller community and be aware of the needs of both.
- The Area Plan should consider infrastructure in its widest sense. This means assessing social mobility and not merely building new roads to create access opportunities. The Plan should aim to provide services for the whole community.
- The Area Plan preparation process should be more accountable and everyone should have equal access to all of the information which informs and influences the decision-making process.

Addressing equality issues through policies in the Area Plan was considered to be a positive development which the Commission welcomed. It recognised that the

Planning Service is now open to advice on equality but urged the decision makers to put a checking mechanism in place so that members of the public may be assured that their input is positively influencing the process.

- **Traveller Movement (Northern Ireland)**

Traveller Movement (Northern Ireland) is a regional umbrella organisation which provides support for and assistance to Travellers and Traveller Support Groups. The Antrim Ballymena and Larne area is home to Travellers living in public sector housing and Travellers who have bought their own land and are hoping to get planning permission to build their own houses. Because of this Traveller Movement is keen that the Antrim, Ballymena and Larne Area Plan addresses Travellers' needs through clear, unambiguous policies.

The Plan, it was said, should recognise the concept of mixed uses on Traveller sites and should facilitate Traveller access to services and facilities to avoid isolation.

Travellers are amongst the most socially excluded groups in Northern Ireland and Traveller Movement (NI) would encourage decision makers to promote social inclusion through policy formulation. Traveller Movement (NI) recognises the importance of being involved in consultations for the Area Plan but is under-resourced.

- **Community Relations Council**

The Community Relations Council believes that the Area Plan has the potential to greatly contribute to community development in Northern Ireland. The Council suggested that the content of the Plan should advance community relations as opposed to mitigating against community relations and in preparing the new Area Plan, the Planning Service should take account of demographic changes and demonstrate an awareness of emerging sectarian problems. The Council expressed the view that the Planning Service must engage with community relations organisations at a more strategic level and looks forward to being part of such a process.

- **Playboard**

Playboard was set up in 1985 to lobby for quality play for children. The issues that should particularly be taken into account in the preparation of the Area Plan were highlighted as:

- Play space and planning for play in the environment.
- Provision of play opportunities that take account of health and safety (for example Home Zones) that could be provided for in the Area Plan and become a formal component of the planning process.
- Rather than solely providing for fixed play space, a whole range of quality play opportunities should be provided for.

Playboard believes that communities should be involved in consultation from the outset. In this way it believes engagement will be much more effective. Reference was made to the fact that Playboard itself is a membership organisation and can therefore speak on behalf of play clubs and like-minded organisations. It has a mandate to do this and can in addition be a conduit for facilitated discussion with the community on play issues.

Playboard believes that it is important to be consulted on Area Plans and voiced strong opinions on the need for a pre-consultation stage and the importance of an evaluation exercise. On a final point Playboard welcomed the decision to commission an independent organisation such as CTA to facilitate consultation on the Area Plan.

- **YouthAction (Northern Ireland)**

YouthAction (Northern Ireland) is a youth development agency for 14-25 year olds. It is a practice based organisation which also undertakes research and training.

In particular the agency asked if the Planning Service could take into account young people's needs for social housing and affordable housing when preparing the draft Area Plan. Other physical (land use) planning issues pertaining to young people were said to include the need to access outdoor facilities - buildings and facilities exist but young people cannot access them. Examining the issue of 'space' YouthAction believes it is important to not only provide physical space for young people (both indoor and outdoor) but to consult them on the type of space that they want, so that they are part of the whole process from beginning to end and will feel ownership of the space, use it and look after it.

YouthAction highlighted the fact that an affordable and effective transportation system is another important issue for young people as is access to local, small business opportunities. The Area Plan, it was believed, could encourage a good public transport system and support the development of small local businesses.

YouthAction also suggested that the Planning Service should adopt a 'support approach' - ie a hands-on and community-led approach to the preparation of the Area Plan. In this way it believes that the Plan will be meaningful from the start.

Young People

CTA accessed a list of all secondary level schools in the Antrim, Ballymena and Larne area from Education and Library Board information. Where possible the schools that were invited to take part in the consultation were selected to ensure a balance between controlled and maintained schools, grammar and secondary schools, urban and rural schools as well as trying to achieve a geographical and religious balance within each council area.

Mapping exercises were used as the main consultation technique. This involved using large scale maps of surrounding settlements which provided a focal point for discussion with the young people. This technique helped to stimulate interest in the subject and generated ideas for specific sites throughout the Plan area.

The findings from this stage of the consultation were very detailed and site specific. Relevant planning issues have been incorporated into the general and locational findings. However it is worth highlighting our main observations of the consultation with young people. Their general comments included:

- Housing allocations should be distributed to the main towns and villages in order to protect the countryside.
- Integrated housing areas could be encouraged and facilitated through the Area Plan.
- There should be more starter homes at affordable prices.
- Wildlife habitats should be protected in all areas and as many green spaces as possible should be retained in towns and villages.
- There should be better access to town centres from estates, better facilities for young people and improved public transport services to cater for people without cars. Electric trams could be introduced in large towns to reduce congestion.

4.4 Written Submissions

During the public and community consultation 22 written submissions were received from community, voluntary and environmental groups.

- **Antrim Borough Countryside Recreation Forum, Antrim Borough Heritage Policy Committee and Friends of Clotworthy Group**

The groups in their written submission expressed the view that there is not enough protection of the countryside in the Antrim Borough and that Lough Neagh and its foreshores, rivers and river corridors (including Sixmilewater Corridor), urban parks and wildlife corridors must be afforded much greater protection in the new Area Plan. Sites suggested for conservation included Crumlin Glen, Rams Island, Sluggan Moss, Donegore Motte and Hill. They also expressed the view that a central issue in the new Area Plan should be the development of tourism and recreation opportunities in the Antrim Borough. In addition, the groups stated that areas should not be zoned for housing development unless the supporting infrastructure is in place.

- **Antrim Towns Development Company**

The Company in its Action Plan document for the period 2001-2006 encourages the concept of mixed-use urban centres arguing that town centre living can add to the vitality and viability of the retail, business services and night-time economy of the Borough towns. It also urges the Planning Service and other statutory agencies to address issues such as access to town centres, transportation, community safety, health and education provision, business and retail services plus the need to increase awareness of heritage, conservation and environmental sustainability issues.

Antrim Towns Development Company also made a written submission which highlighted issues raised in Crumlin and the surrounding hinterlands from a business community perspective. The issues which emerged are detailed under the following headings:

- **Nutts Corner** - A number of significant development proposals such as the Lidl Distribution Centre, Distribution Warehousing and the Motor Sports Centre were identified. The potential for further development was mentioned and the business community called for Antrim Borough Council to act as a facilitator with the Planning Service and other interests to further examine the issues surrounding the Nutts Corner area.
- **Belfast International Airport** - The Company referred to the recently approved mixed commercial development scheme and associated infrastructure works on land already zoned within the Antrim Area Plan 1984-2001. They stated that this scheme has the potential to attract significant investment with economic spin-off for the neighbouring settlements of Crumlin, Antrim and Templepatrick.

- **Crumlin Town** - The Company asked that before any further greenfield land is zoned for development, existing land opportunities and remaining zoned land should be developed first.

The need to identify the potential for small to medium sized commercial developments was highlighted.

The capacity of the town centre to cope with further modern retail developments was questioned. It was stated that the nature of commercial activity within the town centre is likely to change to a more mixed-use range of activities serving niche local needs.

Traffic circulation, car parking and the strategic issue of public transport were debated. The business community noted that residents who do not have access to a car are valuable customers and should not therefore be isolated.

The capacity of existing infrastructure to cope with future potential development was also questioned.

- **Other Issues** - The proposed new urban village at Dunadry (Clanadry) was perceived to fit in with the overall debate on future housing developments within the Borough.

The Lough Shore Trail was identified as an initiative that has potential to impact on tourism around the Lough shore. It was suggested that development of access to and use of the Lough for recreational, sporting and tourism related activities needs to be reflected in the new Area Plan.

- **Caddy and District Community Group**

A community survey carried out by Caddy and District Community Group identified ways in which the area could develop and improve. Some of the suggestions included traffic calming, a children's play area and minimising road flooding in the district.

- **Cairncastle Primary School**

A submission from Cairncastle Primary School highlighted traffic problems on Cairncastle Road. It was suggested that if there was to be any further housing development in Ballygally or Cairncastle then road safety and car parking measures should be facilitated adjacent to the school.

- **Causeway Initiative**

The Causeway Initiative was established to promote sustainable tourism in the Causeway Coast, Antrim Coast and Glens area in a bid to safeguard the sensitive environment there and retain its natural attraction for visitors. One of its main objectives is to set up a Tourism and Environment Partnership which will provide a co-ordinated framework for visitor and environmental

management and provide a strategic approach to the development of sustainable tourism in the area.

The Causeway Coast and Antrim Coast are two of the most popular visitor destinations in Northern Ireland. The Initiative states that the number of cars arriving at some of the sites can no longer be accommodated and expresses concern that some of the key sites are under acute pressure. It is important in the Initiative's opinion to improve the ability of key sites to handle increasing visitor numbers.

The Initiative recognises that opportunities do exist to develop sustainable tourism initiatives. It believes that by spreading the benefits of tourism to other areas pressures on key sites could be reduced. The Initiative states that it is important to ensure that both the ecology and natural beauty of the area is protected to enable future generations to enjoy the magnificent landscape of this area.

- **Cloney Rural Development Association**

Cloney Rural Development Association is concerned with the Aughtercloney area, near Ahoghill. The Association refers to three main issues which are of concern to the local community: the need for more housing development to accommodate local people and to prevent young people leaving the area; the need for existing community facilities to be upgraded; and the importance of the area being socially and economically regenerated.

- **Cullybackey Environmental Improvement Association**

Cullybackey Environmental Improvement Association outlined in its submission a number of key planning issues in Cullybackey that the Area Plan should consider. These are: the roads and sewage system in Cullybackey need to be improved before new housing developments are granted planning permission; the land associated with the Cullybackey bypass scheme should be protected; land should be zoned for small business (incubation) units; Cullybackey Market Yard should be protected as industrial land; the River Main corridor and flood plains should be protected in recognition of their environmental importance; land should be zoned for open space and recreational use within the village (the protection of Holm Field for a community park is given as one example); Harperstown village contains a number of important buildings (some of which are listed) that should be preserved; and access to the countryside around Cullybackey should be facilitated through the provision of footpaths and walking routes.

- **Friends of the Earth**

Friends of the Earth asked if the new Area Plan would be formulated in the context of the councils' Local Agenda 21 Objectives.

It believes that by 2016 strategies to combat climatic change will have been introduced and that energy efficiency standards and the availability of renewable energy would be much higher.

The group also believes that many more wind turbines and other renewable energy generators will be operational and that by 2016 sustainable transport will be well developed and sustainability will be central to all strategic thinking.

- **Gaelic Athletic Association**

The Gaelic Athletic Association (GAA) made the following points in relation to the Area Plan: the need to ensure open space provision to enhance quality of life and to contribute to sustainable development; the need to provide new and upgraded sports and recreation facilities with good pedestrian access from housing developments; and the need to provide sports facilities which are integrated with other large developments.

- **Glenravel Environmental Improvement Association**

Glenravel Environmental Improvement Association, which caters for the villages of Cargan, Martinstown and Newtowncrommelin, raises a number of key planning issues which it believes the Area Plan should consider.

In Cargan and Martinstown in particular, a large number of new housing developments have been built in the last ten years. The Association believes it is important for the design of new housing developments to take account of the surroundings and to ensure that green spaces and existing trees are preserved in the course of development.

Access to the countryside is regarded as an important issue with the Association asking for the proposed walking route through Cargan (which appeared in the Ballymena Area Plan 1986-2001) to be protected.

A number of issues were identified from a Community Action Plan submitted by the Association. These included: the need to introduce and improve footpaths throughout small rural communities; the need for land within the settlement of Newtowncrommelin to be identified for play space; improving access to key areas of interest and developing and expanding local walks as a good way to boost tourism in the area.

The Association also highlighted the fact that local farmers would welcome more information and advice from the Planning Service, perhaps in the form of planning clinics. The Association's Action Plan called for farm diversification within the rural environment to be supported and encouraged.

- **Gracehill Village Committee**

The Committee highlighted the importance of implementing and utilising the existing Conservation Area legislation, stating that best practice should be promoted within the Conservation Area.

The Committee believes that there is no further capacity for housing development within the village and stressed that infill development should be avoided. It also said that any development approved outside the Conservation Area of Gracehill could impact significantly on the settlement.

The Committee stated that green belt areas should be retained and remarked that the fields between the village square and the river form an integral part of the historic village landscape and should be afforded greater protection.

The Committee mentioned that a lot more could be done to boost the tourist potential of the village.

- **Individual Submission - Toomebridge Resident**

A resident from Toomebridge said that the new Plan should ensure that the potential of Toomebridge is recognised and that it must encourage balanced economic growth. This, it was believed, would strengthen a network of opportunities and build upon local resources.

It was suggested that the village boundary should be extended to the south east and this new land should be zoned for housing with a view to accommodating the current demand for social and affordable housing. It was also suggested that the periodic release of land would help to create a more sustainable pattern of development which would encourage regeneration within Toomebridge.

Concern was expressed that the true tourist potential of the village has not yet been recognised or developed. The unique geographical location and the close proximity of the village to the lower River Bann and Lough Neagh was highlighted. This was perceived as a potential focal point for tourist development and the inland waterways an area along which economic activity could thrive. It was stated that the introduction of a 100 metre 'protective zone' along the River Bann would facilitate tourist development. Reference was also made to the level of pollution evident in the River Bann and Lough Neagh and this was deemed unacceptable.

The individual believed that the existing Tidal Industrial Park would encourage further industrial development in the Toomebridge area and that the new bypass currently under construction would offer easy access to such a development. It was suggested that the land between the existing Tidal site and the new bypass should be re-zoned for industry and commercial use to meet this potential demand. Caution was however urged to ensure that appropriate

measures are taken to soften the visual appearance of such industrial developments.

A final comment highlighted the need for significant improvements to both the water and sewerage infrastructure before any additional development takes place within the village.

- **Islandmagee Community Development Association**

The Association believes that many of the current problems in Islandmagee are the product of a disjointed planning system that fails to take the needs of the area fully into account. It argues that the Planning Service should be working more closely with other government departments and local people. It is its opinion that a more inclusive approach to development could result in considerable savings in public expenditure, better service provision and the creation of a better environment for local residents.

The Association highlights several key problems in Islandmagee: the creation of socially unsustainable hamlets; inadequate sewage disposal arrangements; little provision for the prevention of downstream flash flooding from newly developed surfaced areas; housing types which are not in keeping with their surroundings; and little evidence of the upgrading of road infrastructure or provision of footpaths.

Ballystrudder residents (who are affiliated to Islandmagee Community Development Association) believe development should not be permitted on the slopes of Muldersleigh Hill or between Ballystrudder and Mullaghdubh and Cloughfin in order to preserve the rural nature of these existing settlements and their landscape amenity value. The residents also believe development should be prevented on the road from Duff's Corner to the causeway to ensure that further traffic problems do not occur and that the green belt west of Low Road should be maintained to protect visual amenity and wildlife habitat. They suggest particular care will be necessary to prevent Ballystrudder merging with Whitehead.

Mullaghboy Area Residents' Group (who are also affiliated to Islandmagee Community Development Association) raises several key issues for consideration by the Area Plan including: high densities in new housing developments should be reduced in order to retain the rural nature of the area; the proportion of land zoned within the Mullaghboy settlement is excessive; there is a need to protect the visual amenities of areas of landscape quality; and tourist facilities should be encouraged in the area but not at the expense of visual amenities.

- **Larne Enterprise Development Company (Ledcom)**

Ledcom is the local enterprise agency for the Larne Borough. It highlights a number of planning issues which it believes should be considered in the preparation of the Area Plan.

Firstly it argues that diversification of rural businesses (farms especially) should be encouraged primarily through a relaxation of planning controls. The importance of dualling the remainder of the Larne to Belfast route (A8) is stressed, particularly in light of the fact that it is heavily used by commuters and has business potential given the proximity of the Belfast to Dublin economic corridor. Finally, the case is made for additional and urgent industrial zonings in Larne to accommodate growing businesses and to encourage inward investment to the Borough.

- **Millbay Residents' Group**

Millbay Residents' Group submitted a detailed paper highlighting issues relating to both Millbay and Islandmagee. The Group would like to see extensive traffic calming introduced in Millbay with appropriate road and speed warning signage and no access for lorries along the 'corkscrew bends' in the south of the village.

Looking at housing issues, the Group asks for the protection of the village development limit citing its support for the re-use of existing buildings for housing development, low density housing, the use of traditional house designs, protection of hedgerows and trees, and the prevention of skyline developments near Larne Lough.

In terms of amenity, the residents believe consideration should be given to the restoration of the pier and associated access path with the provision of a small amenity play area for children.

Serious water and drainage problems are highlighted by the Group. It believes that groundwater is not being effectively managed and that the problem is exacerbated by additional pressures placed on it by gas pipelines and new housing. As a solution, the Group suggests that an integrated approach should be adopted by planning, water and agricultural authorities to deal with the variety of issues and problems currently experienced by the residents of Millbay.

Shifting its focus to Islandmagee, the Group highlights the plight of this area and perceived threats to its important landscape. The residents of Millbay wish to see: refusal of planning permission for any further energy schemes; undergrounding of cables and other lines; provision of a high grade sewerage scheme for Larne; restricted housing development on the Island (particularly at Ballystrudder); location of more health and social service facilities in the area; improved public transport and parking at Whitehead railway station; retention and improvement of the Larne to Ballylumford ferry service; establishment of

Islandmagee as a Conservation Area; extension of Larne Lough Special Protection Area to include the whole Lough; the regulation of heavy industry (especially at the power station) in terms of smoke emissions; control of river pollution incidents; use of sustainable practices in landscaping; the provision of a small recycling centre at Ballylumford Harbour; establishment of rights of way; and the cessation of landfilling practices at Magheramorne quarry.

Commenting on the planning system, Millbay residents urge the Planning Service to adopt a more integrated approach to the treatment of planning cases asking that residents are automatically involved in the development control consultation process.

- **Raloo Village Residents' Association**

Raloo Village Residents' Association strongly urges the Planning Service to designate Raloo as a Conservation Area. The Association, referring to the special features of the village, believes that the development limit should not be extended citing the following reasons: recent developments have already stretched the settlement to its limit; further extension would undermine the concept of this settlement as a Conservation Area; and, given the inadequate infrastructure, further development would be inappropriate and unacceptable.

The Association made reference to a single track laneway by which all traffic must enter and leave the village. It stated that while the volume of traffic using this laneway has increased significantly, upgrading the road to accommodate this increase would alter the character of the settlement and residents would oppose this move. The Association emphasised that the village is serviced by a series of minor 'C' class roads. Given the inadequate infrastructure further development would be inappropriate and unacceptable.

Raloo Village Residents' Association also indicated that further development cannot be serviced by the currently inadequate sewage facilities. It urged that the rural character of the area be protected and stressed that the inappropriate expansion of minor settlements would be strongly resisted.

- **Randalstown Arches Association**

The Association highlights the need to zone land for sporting facilities in Randalstown and states that in conjunction with Antrim Borough Council it has plans for a major sports development which has cross-community support. The need for an appropriate zoning, it says, should be taken account of by the Area Plan.

- **The Royal Society for the Protection of Birds**

The Royal Society for the Protection of Birds (RSPB) supports the production of a Sustainability Appraisal for the Antrim, Ballymena and Larne Area Plan. It suggests the Appraisal should be carried out during the Plan preparation phase

so that policies and zonings that might compromise the Plan's sustainable development objectives can be modified or omitted as appropriate.

The Society argues that despite Sites of Local Nature Conservation Importance and PPS 2, there is still a danger that undesignated areas of priority habitat and bio-diversity priority species will be afforded no protection by the Area Plan. For this reason the Society commented that it is essential the Plan identifies the main priority habitats and species and includes policies which will provide for their protection and development.

In terms of tourism the RSPB suggests recent controversial developments and proposals on the north Antrim coast graphically illustrate the need for very clear criteria to be produced for tourism-related developments. Planning policies for AONBs in its opinion, should therefore be clarified and strengthened, while consideration should be given to the identification of areas which are particularly sensitive to certain developments.

The RSPB voiced concern that north coast farmland inhabited by bio-diversity priority species such as the yellowhammer is threatened in some areas by housing. In addition, it was suggested that new housing developments should include an element of bio-diversity enhancement to help offset the losses they cause. The RSPB believes the Area Plan should therefore make specific reference to relevant aspects of PPS 7 (Quality Residential Environments) and to the use of planning conditions or agreements to ensure that no net loss of bio-diversity occurs.

The RSPB supports the development of renewable energy in Northern Ireland. It does state however that some locations are unsuitable for wind farms as they can adversely impact on priority bird species such as the hen harrier. It cites research which shows that wind farms can affect the hunting success of harriers and threaten their continued existence in areas with wind turbines. For this reason, the RSPB says that wind farm developments should be located away from known sites of hen harriers and other priority upland species.

- **Stiles Community Association**

A number of issues were identified from a 'Strategy for Sustainable Development' submitted by Stiles Community Association. The Strategy identified the need for new community facilities within the Stiles Estate to cater for young people, older people and people with disabilities.

The Strategy highlighted that the lack of public transport is having a negative impact on both the economic prosperity and social structure of the community.

Concerns were expressed that the poor physical environment is leading to a range of problems including anti-social behaviour.

- **Tickmacreevan Parish (Glenarm)**

In the submission from the parish of Tickmacreevan three main issues in Glenarm are referred to: the lack of available housing in the Feystown area for young people who want to live close to their families; the lack of local employment opportunities; and the need for more housing near St Mary's Church on the Feystown Road.

- **The Ulster Wildlife Trust**

The Trust raised a number of issues that it believes should be addressed in the Antrim, Ballymena and Larne Area Plan. It refers to Recommendation 36 of the Bio-diversity Strategy which places responsibility on the Planning Service to address bio-diversity priorities fully and consistently in all development plans. It also acknowledges that there is likely to be a high demand for housing within the Plan area but that this must not be at the expense of sites of nature conservation importance. The Trust would like to see buffer zones established around these sites to minimise any negative impacts of development and would also urge the Planning Service to identify and protect wildlife corridors which are essential for the long-term protection of urban habitats and species.

While the Trust broadly welcomes the re-use of brownfield sites within urban areas it states that it must be recognised that, because of neglect, some brownfield sites have developed into good quality wildlife sites. The Trust therefore suggests there should be clear planning policies relating to any brownfield sites which are identified as being important in terms of nature conservation, with a strong presumption against their development. The Wildlife Trust would also like to see the Area Plan encourage the restoration of landfill sites and quarries for conservation and amenity purposes.

The Trust highlighted several concerns it has regarding the coastline around Larne. To prevent losses to coastal bio-diversity it believes several issues should be addressed: to minimise sewage discharges into Larne Lough provision should be made for the upgrade of existing sewage treatment plants; an assessment of the opportunities that exist for the managed retreat and/or development of natural coastal defence habitats should be undertaken; to protect remaining stretches of undeveloped coastline from housing pressure, the Trust would like to see greater use made of Countryside Policy Areas; and finally the Trust believes that careful consideration should be given to the cumulative impacts of multiple uses of the coast on bird species when formulating policies for the coastal environment.

- **The Woodland Trust**

The Woodland Trust emphasises that Northern Ireland's woodland heritage is in need of particular protection given that it now has the lowest tree cover of any region in the European Union. The Trust would like to see all 'ancient' and 'long established' woodland identified within the life of the Area Plan given 'absolute

protection' from development. In particular the Trust would like to see wording in the Area Plan such as: "development will only be acceptable where it will not result in the loss of, or damage to, ancient woodland."

The Area Plan should seek to create new woodlands as a means of increasing tree cover in the area. These could be community woodlands, urban woodlands and new woodland planting around semi-natural ancient woodland sites. The Trust believes that the creation of such woodlands is an effective method of creating new urban green space and that trees play a unique role in shaping the urban environment, supporting wildlife, providing recreational opportunities and alleviating pollution. They also have a particular role to play in oxygenation and becoming the 'green lung' for urban environments.

The crucial part that green space plays in making urban living more attractive is also highlighted by the Trust with a plea made for the Antrim, Ballymena and Larne Area Plan to recognise the value of this. Referring to the RDS and its statement that trees and woodlands must be protected and managed, the Trust is of the opinion that the greatest threat to semi-natural habitats is the degree of their fragmentation. Efforts should be made, in its view, to increase the core area of semi-natural habitats, thus protecting sensitive ancient species in particular from the 'edge effect' caused by human disturbances occurring near woodland sites. The Trust recommends that blocks of woodlands are planted rather than lines or corridors of trees in a bid to overcome the difficulties associated with this 'edge effect'.

4.5 Evaluation of Consultation Events

Participants at each public meeting and drop in event were given an evaluation form to complete. The information supplied on these forms is valuable feedback for CTA. It helps with future planning of consultation events and provides data on the profile of participants enabling us to see if we are achieving our desired outcomes regarding equality, equity and inclusiveness. 475 people attended the public meetings and 34% completed an evaluation form.

The participant data showed:

- 71% of participants were male and 29% were female;
- 44% of participants were from the Protestant community, 41% from the Catholic community (the remainder belonged to neither community or declined to respond);
- participants were evenly split between the 26-45 and 45-60 age groups and the 60+ age group accounted for 27%;
- all participants described their ethnic background as white;
- 8% of participants regarded themselves as having a disability.

Feedback on the promotion and implementation of the events included:

- 36% of participants found out about the events through letters from CTA or from receiving or seeing a flyer or poster; 42% from newspapers advertisements and 22% by word of mouth;
- 70% of participants found the events excellent or good, 29% rated them as average and 1% useless; and
- 89% of participants thought the events had given them an adequate opportunity to express their views (6% said they had not and 5% were unsure).

5. Concluding Comments

The public and community consultation on the first stage of the Antrim, Ballymena and Larne Area Plan 2016 ensured that as many people as possible in the Plan area had an opportunity to participate in the process.

Hundreds of people across the three council areas took this opportunity and participated in some way. Many were involved in the community outreach programme. Others gave their views during the equality consultation and the schools visits. The remainder attended the public meetings or drop in sessions or sent written submissions.

Each of them played their part and their views and comments have been reflected in some way in this Report.

The information in this Report will inform the Planning Service of the many issues dominating the debate in the communities affected by the Plan and will help in the translation of these issues into policies and statements in the Draft Plan. These policies will hopefully make a difference to the lives of those communities in the Plan area.

Appendix Consultation Events - Locations and Dates

Larne	-	27 May 2002
Crumlin	-	28 May 2002
Ballymena	-	28 and 29 May 2002
Antrim	-	30 May 2002
Toomebridge	-	5 June 2002
Carnlough	-	6 June 2002
Glenarm	-	10 June 2002
Portglenone	-	11 June 2002
Randalstown	-	11 June 2002
Islandmagee	-	12 June 2002
Martinstown	-	13 June 2002

Community Technical Aid is the only region-wide voluntary organisation which provides professional planning and architectural services for community and voluntary groups. We facilitate community participation in planning and support community development by assisting groups to develop the skills, knowledge and infrastructure needed to regenerate disadvantaged urban and rural areas.

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