



Northern Area Plan 2016 Public and Community Consultation

**Community Technical Aid
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Executive Summary

The public and community consultation on the Northern Area Plan 2016 was facilitated by Community Technical Aid and took place from September 2001 to July 2002.

Key elements of this proactive process included:

- promotion of the process through advertisements in regional newspapers, and press coverage in local and community newspapers;
- contact with key community networks and agencies including council community development and community relations staff;
- written communication with all identified community, voluntary and environmental groups;
- a community outreach programme focused on areas of weaker community infrastructure;
- one-to-one meetings with organisations representing the statutory equality groupings;
- planning workshops with young people in schools across the area;
- planning information, drop in and promotional events at different times of the day in main areas of population;
- a series of evening time public meetings in each of the council areas of Ballymoney, Coleraine, Limavady and Moyle during May 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 Northern Area Plan. Their considered views often reflected feelings of anger and frustration and they raised many diverse topics and issues.

The problems associated with apartments and second homes in the coastal parts of the Plan area dominated the debate. Many people said that the situation has reached crisis point and that the Area Plan needs strong and effective policies to stop the situation worsening. Solutions offered included residency requirements, higher taxes on second home owners and charging higher rates on holiday properties.

In addition many residents of the towns and villages affected (which included Castlerock, Portrush, Portstewart, Portballintrae and to a lesser extent Ballycastle, Cushendun and Cushendall) urged the Planning Service to include strong statements in the Area Plan referring to the character of these places, saying that

developments that are out of keeping with the local character and built heritage will no longer be acceptable.

They maintained that the Area Plan can be bold in its approach and that these problems, even if they cannot be solved, can certainly be curtailed.

Other housing issues raised throughout the consultation included the need for affordable housing especially for young people, housing choice for older people and families in particular, social housing, adequate housing in rural areas to meet need, and housing developments with open space, play areas and planting schemes that would ensure their quality and attractiveness.

Discussion also focused on the state of infrastructure, especially roads, water and sewerage, and how in most areas inadequacies with these systems are affecting the growth of many settlements; the need to more adequately protect the natural environment; the lack of local employment opportunities; the decline in many retail facilities in town centres; the need for agricultural diversification; the growth of tourism and the need for sustainability; the lack of community facilities, recreational facilities and open space in many settlements; the need to consider carefully the location of wind farms; and the need to radically improve roads and transport systems to help tackle social exclusion, congestion and pollution.

The issue of sustainable communities was both directly and indirectly mentioned. Many would not accept that the planning system relates only to land use issues and instead urged the system to take a holistic approach. The important relationship between land use, the economy, sustainable development and the social structure of communities was highlighted. Many argued that it is not enough for the planning system to zone land for various uses and then leave the market (and others) to deliver this vision and Plan. They stressed the need for the planning system to look realistically at the whole picture and take responsibility for the inevitable social and economic consequences of land use planning. Nowhere is this more evident, they argued, than in over-developed towns and villages that have been reduced to locations for a seasonal population of holiday makers who, in the view of many at the meetings, contribute little to the local economy and often play little or no part in the social life of the community. It was argued that such areas are "dying" as a result of planning's inability to intervene and engineer solutions to this issue. Hundreds of people affected by these problems on a daily basis have said it is time now for change and that if the planning system is to redeem itself the change must be imaginative, radical and courageous.

1. Introduction

Preparation of the Northern Area Plan 2016 is in its preliminary stages. This Plan will inform the public, statutory authorities, developers and other interested parties of the policy framework and land use proposals which will be used to guide the shape and development of the Northern Plan area (an area which covers the four councils of Coleraine, Ballymoney, Moyle and Limavady) over the next 15 years. From this perspective it is an important document and one which will hold the key to the future of the Northern area, deciding issues such as the location of new housing and industry, the potential for tourist development and the threats to vulnerable landscapes from inappropriate forms of development.

Multiple steps are taken by the Planning Service in the preparation of the Area Plan. This Report is an account of one element of the preliminary stage consultation with the public and community sectors.

This preliminary stage consultation revolves around the use of an Issues Paper document. This document focuses attention on key planning issues for the Plan area and guides consultees through the issues involved.

As an approach the Issues Paper contrasts sharply with the previously-used Preliminary Proposals document. This was often criticised as an outdated, lengthy and somewhat biased method of preparing an Area Plan with critics believing that the bulk of the land use decisions had already been taken. This was a commonly held view given the inclusion of maps illustrating proposed development limits and zonings.

The Issues Paper approach was introduced by the Planning Service in an attempt to move away from the Preliminary Proposals approach. One of the main hopes was that this would help to speed up the system and ultimately result in the production of an Area Plan in a shorter timescale.

More importantly the Planning Service was keen to adopt a more inclusive and proactive approach to the preparation of Area Plans. This is in line with government policy on inclusiveness and community participation in the planning process.

As part of this new approach to public participation, Community Technical Aid (CTA) was appointed by the Planning Service in September 2001 to undertake independent consultation with the public and community, voluntary, environmental and equality groups on the Northern Area Plan 2016.

The findings of the consultation are detailed in this Report. Section 2 provides background information on the rationale for the consultation approach, Section 3 outlines the methodology employed, Section 4 reports the consultation findings from all stages of the public and community consultation 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 in the consultation.

We have used our judgement in summarising the comments and issues raised while seeking to ensure that the accuracy and emphasis of these views is not compromised.

This Report was submitted to the Planning Service in July 2002 and thereafter issued to everyone who participated in the public and community consultation process.

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 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 proactive public and community consultation at the Issues Paper stage of the Area Plan process where many previously marginalised by the planning process are being encouraged to become involved.

CTA welcomes these developments and the progress made 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, the community and voluntary sector and representatives of equality groupings on the Northern Area Plan 2016. This appointment began in September 2001 and including both pre and post Issues Paper publication consultation ended in July 2002.

3. Methodology

Community Technical Aid divided the Northern 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.

Fact finding and exchange of information is not often used in traditional consultation. This stage involved outreach work, education, information and support to those communities we were trying to engage in the process. By including this stage the consultation was more meaningful 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 ensues, consultees are involved at the midway point in the process and are left feeling slightly removed from the outcomes.

Mindful of these facts and the need for inclusive and meaningful consultation we factored this pre-consultation stage into the Northern Area Plan process. It covered a two month period (September and October 2001) during which we specifically targeted all community, voluntary and environmental groups operating in the four council areas. In total we identified and wrote to 856 groups informing them of the consultation and asking them to get involved. To help inform them we included 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 four councils (in particular their community development or community relations officers) and Oakleaf Rural Community Network and North Antrim Community Network, the two umbrella community forums 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 October 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 us with 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 November 2001, was then used by the Northern Area Plan Team in conjunction with other statutory consultation responses in the preparation of the Issues Paper. The hope throughout this stage was that both 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 also 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 networks and the councils' relevant officers.

This was an innovative and new approach and was based on our knowledge from previous Area Plan consultations of the skills gap which exists among many community and voluntary groups.

We contacted and met with 40 groups as part of the outreach programme, explaining the Area Plan process to them, the relevance to their group and/or community and its needs 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 November 2001 to February 2002 and helped to equip these groups with the information needed to input more comprehensively into the Area Plan consultation. The information we gathered from these groups during 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 generally not land use specific.

During this two month period we also consulted with young people in seven schools in the Northern 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 their views are not often heard in typical consultations and that they were unlikely to participate in public meeting style events. Students from both sides of the community in each of the four council areas were involved in this stage. Their views on the Plan, where possible, have been incorporated 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. We held **planning information sessions** for members of the public in main towns throughout the Plan area in a further attempt to promote the consultation, canvas views on the Area Plan and encourage people to attend the events. These sessions were also an innovative step in the process and sought to enhance and widen public participation in the consultation. While the outreach programme for community and voluntary groups was designed to increase group participation, the planning information sessions were designed to increase participation from members of the public. Wide distribution of information leaflets during these sessions helped to promote the process and provided details of the consultation events. Feedback on the success of this method is shown later in this Report.

The traditional consultation (Stage 2) began on 30 April 2002 with the publication of the Northern 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. Sixteen events were held throughout the Plan area during these three weeks. Locations for these events were chosen in consultation with community groups and councils, taking into account geographical, religious, accessibility, capacity and neutrality considerations as well as 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

The preliminary stage of the consultation took place from September 2001 to April 2002. Elements of this stage included preliminary information gathering with community and voluntary groups in the Plan area; a community outreach programme with lower capacity groups on the importance of the Plan and the relevance to their communities; structured interviews with representatives of equality organisations; planning information sessions with members of the public throughout the four council areas; and consultation with young people from seven schools in the Plan area.

Following publication of the Issues Paper on 30 April 2002, 16 public and community consultation events were held during April and May 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 four 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.

General Issues

- **Apartments and Second Homes**

The issue of second homes and the related issue of apartments (which many said are used as second homes) dominated the debate at the majority of the consultation events. Frustration and anger was expressed by participants, particularly by those participants who live in coastal towns and villages which, in their opinion, have witnessed substantial changes in recent years. These changes have occurred both demographically, in terms of population shifts as the resident population moves out and holiday makers move in, and with respect to the built environment, as many older buildings are demolished and replaced with modern buildings which some regard as out of character with the surrounding area.

On numerous occasions participants referred to the crisis point that, in their opinion, has been reached. They believe that the trend towards over-development of apartments and holiday homes has virtually destroyed the heart of many settlements and that as a continuing trend it is an untenable one. The Planning Service was asked to undertake a radical review of the problem and to formulate policies to contend with this issue. Comments included:

- Apartment developments constructed to date in many coastal towns and villages have radically and detrimentally altered the character of these areas.
- The intensive development of apartments and second homes along parts of the North Antrim coast is effectively forcing local people out of their communities - some believe the tourist is being favoured by the planning system.
- Apartments are often expensive and cannot be purchased by many local people, especially younger people.
- The Planning Service should take into account the cumulative effect that numerous apartment and second home developments is having on the built and social environment of communities.
- Some schemes are resulting in the replacement of one or two older houses with modern buildings comprising 12 or more units - this, many believe, is over-intensification.
- Many of the properties are built and then left empty, either because they are unsold or because their owners only occupy them for a few months of the year, and this contributes little to the local economy - some empty buildings are an attraction to children and in themselves can become a health and safety hazard.

- The apartment market is at saturation point and there will eventually be a glut of empty, even derelict apartment schemes.
- High density housing in Belfast in the 1970s proved unsuccessful and a repetition of the same mistakes should therefore be avoided now.
- Apartments and the second home issue in general is damaging the sustainability of many communities as many facilities close or go out of business, local people move away and these new developments lie empty.
- Instead of locating apartments in sensitive coastline locations and in smaller villages which cannot sustain them, the planning system should encourage development of apartments in urban areas and larger settlements.
- Many apartment developments are visually obtrusive, destroy the skyline and due to their limited size are not suitable for family accommodation.

Many solutions were offered to the problems caused by the second home issue. These included: a higher or a double rating system on second home owners with the revenue being used to fund community development; setting aside a proportion of schemes as affordable and/or social housing units following examples set by other coastal areas (such as Devon and Cornwall) where second homes are cleverly sited away from the coastline; the introduction of residency laws wherein applicants would not be granted planning permission for new housing in certain sensitive locations unless they could prove that they are residents and intend to live in the properties for a specified period during the year; and preparation by the Planning Service of a design guide for apartment developments detailing what would constitute an acceptable scheme.

Some comments were more positive about apartment developments. These included:

- The availability of apartments can help to address the demand for private rented accommodation for people who are unable to purchase a home.
- Apartments can provide secure accommodation in town centres if they are 'gated' or involve schemes with security systems and they can therefore meet some of the need for sheltered accommodation for older people.
- There may be human rights issues involved in this debate and the rights of those individuals who want to own a second home. However while some believe that a percentage of the population needs a second home others stressed that the idea of a perceived need is wrong and that no-one needs a second home.

- **Affordable Housing**

Many participants throughout the consultation process raised the issue of affordable housing. They expressed their views forcefully, stressing the effect the lack of affordable housing is having on the sustainability of local communities. It was emphasised that young people in particular are being forced to move to other areas which has resulted in changing social structures in many settlements. The comments on this issue were wide-ranging and included the following:

- Developers should be forced to provide an amount of affordable housing in developments. Examples were cited of this happening in London where developers include low cost housing in larger high cost housing developments.
- The Planning Service should attach residency conditions to new housing developments as is the case in the Lake District.
- Recognising the potential problems with each of these suggestions participants discussed how to define housing for local people and how to enforce these ideas in rural areas where developments are usually smaller in scale.
- The problem with a lack of affordable housing could be solved by granting planning permission to allow farmers to build houses on their own land to accommodate family members, especially young people.
- Market forces might eventually alleviate the problem of affordability in housing but in the meantime the planning system has a pivotal role to play in solving this issue.
- Concerns were voiced over the negative impact the lack of affordable housing is having on local communities - those who cannot afford to buy houses are being forced to rent properties in other areas which is compromising the sustainability of the social and economic structure of many towns and villages.

- **Social Housing**

Social housing, that is housing not provided by the private market, was debated extensively throughout the consultation. Participants generally believed the current system of allocation to be inexact and therefore inadequate. Many queried the Planning Service's methodology when making an assessment of housing need and asked if latent or hidden need was taken into account. The need for social housing allocation was raised on occasion at various locations throughout the Plan area with mixed views on this issue.

Comments included:

- The Planning Service should consult with the Northern Ireland Housing Executive and Housing Associations when assessing the need for social housing units in the Plan area - information on planned schemes, waiting lists and latent demand needs to be made available before an assessment can be accurate.
- The Planning system should determine that a percentage of new housing allocations will be provided by social housing providers.
- More radical solutions are required - perhaps a policy could state that a percentage of all new housing developments is set aside as social housing units.
- There were mixed views on integration or segregation of housing developments and whether developers could or should be required to have a 'social conscience' on this issue.
- The percentage of new housing developments that should be set aside as social housing units needs to be determined and set locally to reflect local demand and the local market.
- The location of new social housing units is often a contentious issue and could be solved in some instances by moving green belt boundaries.

- **Housing in the Countryside**

Many participants maintained that rural people often find it difficult to obtain planning permission for housing in the countryside and that this in turn is having a detrimental effect on the sustainability and life of many rural communities. Comments included:

- It is difficult to obtain planning permission for rural housing, especially in the open countryside (both inside and outside policy areas) and families often cannot stay together as a result of this, farming communities are being destroyed, the fabric of rural life is being compromised, rural regeneration suffers and the concept of a sustainable rural community is disappearing fast.
- Applications for planning permission for housing in the countryside should be looked at on merit with local people being treated favourably in a bid to keep the countryside alive and populated.
- Dispersed Rural Communities are equally important in the settlement hierarchy and the Area Plan should identify more of them as a way of injecting new life into rural areas.

- Schools and rural transport services suffer if inadequate housing is not permitted in the countryside.

- **Housing Allocation and Growth**

The allocation of new housing zonings and the growth of settlements was debated at the majority of the consultation meetings. It was said that housing growth should be focused on existing settlements but with controlled growth allowed in rural areas. There were many queries over how the Regional Development Strategy (RDS) calculated the housing figures for each council area and questions asked on how realistic or practical the estimates would be. The debate on the issue was wide-ranging and challenging. The main points made included:

- A high proportion of the housing allocation should be directed towards villages and small settlements. This would, it was suggested, relieve some of the pressure for individual houses in the countryside.
- The Planning Service should zone existing gap sites or re-use brownfield sites and derelict buildings in villages and small settlements for housing developments.
- Housing should be permitted throughout rural areas and not solely in settlements. The reason for this suggestion was that villages and small settlements could lose their identity if they expand too much.
- New small settlements should be created to allow for housing growth in rural areas - in the past there would have been many more settlements than exist now, therefore the Area Plan should allow for small developments of six or seven houses in rural areas on sites which are sheltered and set back from the road.
- The Area Plan should reduce the pressure for ribbon development, but encourage more appropriate nodal development.
- The housing allocation figures contained in the RDS need to be carefully monitored.
- The number of second homes and the number of planning applications submitted, withdrawn, approved and refused will have to be taken into consideration when housing allocations are being calculated. Only by analysing all of these figures together will the Planning Service have an accurate picture of the needs and demands for housing in a particular area.
- Villages and small settlements should not be allowed to grow unless they have the social infrastructure to support that growth

- Increasing the number of houses in the countryside could encourage greater car use and in turn worsen traffic problems.
- The Planning Service should be aware of rising sea levels and avoid zoning land in areas under threat of flooding.

- **Housing Design**

The majority of participants stressed the need for more houses in particular areas but were also keen to ensure that these houses will be a mix of the appropriate type, size, style and density. A number of comments were made on the design of new developments and included:

- People urged developers to provide a mix of house types to cater for all sections of the community including young families and older people. Participants remarked that this is more likely to result in thriving and sustainable communities.
- Concern was voiced over the density of recent developments. It was considered that housing densities have been too high without any associated community space or facilities being provided which has ultimately impacted negatively on local communities.
- Design of new developments should conform to a number of standards, such as not breaking the skyline, being in keeping with the existing or surrounding character, using local materials but also encouraging high quality and individuality.
- The design of houses in the countryside which have been approved is unacceptable in many cases - bungalow blight is the main problem yet with imaginative design and an appreciation of what works well in the countryside this problem could be solved.
- An examination of traditional settlement patterns and house designs would provide many of the solutions to the issue of poorly designed rural housing - many believe that previous generations had more sustainable housing styles and the re-use of derelict groups of houses should now be considered.

- **Other Housing**

Comments on other housing issues included:

- Roadside and clachan style housing were traditional development patterns and these should be retained where possible.
- High density buildings in small villages are inappropriate.

- Redevelopment of replacement dwellings is hampered by the restrictions on floor area imposed by the Planning Service - this is not suitable in today's housing environment as modern living cannot be accommodated in units which were built many years ago.

- **Town Centres and Retailing**

The detrimental effect of inappropriate retail development was a main topic discussed with many participants highlighting the negative effect this has on both urban and rural centres.

A balanced approach to retail development was called for to ensure that both the vitality and viability of town centres is retained.

There was also a call for the Planning Service to support and encourage the establishment of local shops and businesses which many believed would further stimulate local regeneration.

It was said that towns' roles as service centres must be maintained and strengthened by the Plan and that in turn this could contribute to a more environmentally-friendly way of living, with a reduced number of people needing to travel.

- **Tourism**

The general view expressed at most of the public meetings was that tourism is a key local industry which has the potential to greatly expand and develop. However, many said that natural assets should not be spoiled in the process of developing the industry, for it is the aesthetic quality of the landscape that attracts tourists. Other comments included:

- There are opportunities to develop activities such as fishing, walking and cycling. Sustainable ways of developing tourist facilities need to be found and footpaths and cycle paths should be developed comprehensively so they contribute to this.
- Old farm buildings should be developed as tourist accommodation and if the rural road network is improved, tourist facilities could be encouraged in more remote areas.
- There is a presumption in favour of tourism developments. Local people have difficulty getting planning permission for private houses and it seems policies protect the environment for tourists but penalise local people quite harshly. It is more important, many people believe, for the Plan to cater for local people rather than attracting tourists into an area.

- Guest houses and bed and breakfasts throughout the Plan area are being replaced by apartments and as a result there is a decline in the level of available tourist accommodation - this is restricting growth in the sector.
- The Planning Service should recognise the importance of sustainable tourism to the local economy particularly as the agricultural industry continues to decline.

- **Roads and Transport**

The inadequate condition of many roads throughout the Plan area was highlighted by many participants as was the social exclusion created by the lack of expenditure on roads in rural areas. Public transport in rural areas was referred to as inadequate and non-existent in some places.

Promotion of alternative forms of transport, including walking and cycling, was offered as one possible solution to many of the problems associated with an inadequate road and transportation network. Comments included:

- Rural communities, socially excluded and disabled people are marginalised as a result of an inadequate road network and are not able to access key services.
- If rural communities are to survive an effective and reliable rural public transport system needs to be introduced - the Planning Service and the Roads Service need to work together on this issue.
- Adequate road infrastructure should be in place before any further development occurs - the existing road system cannot cope and the Plan should include a policy statement to this effect.
- The Area Plan should encourage and facilitate the development of cycling and walking facilities as part of a 'green' transport system.
- The Plan should make provision for some park'n'ride facilities in the Northern area.
- The Protected Routes Network which is designated by the Roads Service and operated by the Planning Service was often criticised. These routes, (which are defined as: primary routes; routes between principal towns; routes to ports and airports and selected routes with high traffic flows), have planning policies in place which restrict access onto them. Participants queried the fairness of such a policy when it precludes many landowners from obtaining planning permission for housing which would create new accesses onto these routes from their land. Some participants believed that the operation of such a policy is discriminatory and is in need of review.

- **Industry and Employment**

Many participants said that the Northern Area Plan should make some provision for the development of local employment opportunities. It was suggested that zoning for starter units within small rural settlements would contribute to regeneration and would also reduce the need to travel to larger urban centres.

Participants suggested that advances in computer technology could facilitate the decentralisation of some government offices and this may increase employment opportunities.

- **Natural Environment**

Protection of the natural environment and more strict control over activities which have detrimental effects on the environment was called for repeatedly. Participants were particularly concerned about the loss of trees and important habitats, coastal erosion, environmental designations and sustainable developments. Comments and issues raised included:

- Trees should be afforded utmost protection by the planning system; developers should be prevented from removing them or fined heavily if they do; mature wooded areas in the countryside are important and in need of planning designations to protect them; and the planting of trees throughout the Plan area should be positively encouraged through either an Area Plan statement or policy.
- Wildlife habitats should be better protected throughout the Plan area.
- Coastal erosion is exacerbated through inappropriate developments and planned developments such as wind turbines and the extraction of sand and stone from many beaches along the North Antrim coast - the Area Plan could provide policy solutions to these issues.
- The erection of mobile phone masts is detrimental to the natural environment.
- Area of Outstanding Natural Beauty (AONB) and Area of Special Scientific Interest (ASSI) designations are worthy but inconsistently applied, the whole of the North Antrim coast should, many believe, be included in the AONB boundary.
- Protection of the natural environment would contribute greatly to the development and enhancement of tourism.
- Green corridors and green spaces help to protect and enhance the natural setting of settlements and to assimilate them into their surroundings.

- The Area Plan should contain a reference to rising sea levels throughout the Northern area and how the location of new developments in the Plan area will be strictly governed to take account of this.
- Environmental as well as economic sustainability needs to be considered by the Planning Service - the Area Plan should contain strong statements on the need to promote sustainable development in all aspects of future development.

- **Built Environment**

The built environment did not dominate the consultation but debate on the issue was focused and informed. The points raised included:

- The Planning Service should carry out environmental assessments of each settlement and develop policies through the Area Plan to protect listed buildings and buildings of interest more forcefully.
- Conservation Areas are beneficial in areas where home and business owners can afford to abide by the restrictive and expensive development control regulations. However it was stated that Conservation Areas do not benefit communities where there is a demand for affordable houses as the restrictive policies tend to keep house prices too high. A degree of flexibility is needed in Conservation Areas to enable changing demands to be balanced with environmental protection.
- The Area Plan should safeguard Areas of Townscape Character and encourage environmental improvement schemes to ensure the retention of the character of rural settlements.

- **Community Facilities**

A number of people raised the issue of a lack of or declining community facilities throughout the Northern area. Often there was frustration that local people have to go to bigger towns to access facilities and services which has had a negative impact on the balance and sustainability of settlements. Referring to the RDS and its policy on improving access to services and facilities, participants queried whether the Area Plan could alleviate the problems experienced by local people. The views expressed included:

- There should be a network of multi-use community facilities to cater for the needs of all sections in the community. This would encourage and support local rural areas, creating more vibrant and sustainable communities.
- The Area Plan should, as far as possible, encourage community facilities to develop in the heart of settlements and encourage the re-use of existing buildings.

- Hotels (even old, run-down ones) are valuable community facilities and should not be lost to new apartment developments and it was suggested that the Planning Service should use planning conditions to require developers to rebuild hotels when permission is granted for apartments on former hotel sites.
- Schools often act as community facilities - in areas where numbers are falling and schools are being closed it was believed that the impacts are far reaching - the problem becomes an equality issue when a local community facility, such as a school, is closed.
- Councils should provide more household bins for different types of waste and there is a need for more, but sensitively located, recycling facilities and amenity sites.

- **Recreation and Open Space**

The discussion on recreation and open space centred on the protection of existing land and the provision of amenity land in new developments. The majority of participants agreed that there is a need for sizeable amounts of land for recreation and open space to be zoned in the Area Plan.

It was recommended that all existing amenity land in each settlement should be protected from development by the Area Plan. This should include open space in town centres and other land zoned in existing Area Plans. One participant suggested that the Area Plan should create new open spaces or recreation land in centres, as has happened successfully in Scotland and Wales, as this has encouraged people to live in town centres and has addressed the need for the provision of play space for children and young people. However, there was a fear that the Area Plan would not adequately address the issue as the Issues Paper had placed little emphasis on the provision of amenity space.

There was concern over the amount of land for recreation and open space that has recently been developed for housing. People stressed that open space and children's play areas should be incorporated into the design of new housing developments which should be maintained by the councils or by the developer.

- **Infrastructure**

There was widespread concern over the urgent need to upgrade water and sewage systems in various locations in the Plan area with people wanting to know how new housing will be zoned when the existing sewage system in many places is already operating at capacity. Comments included:

- Additional housing will exacerbate the sewerage problems.
- Minor roads flood in heavy rain and the higher rainfall figures currently being experienced mean that the water and drainage system cannot cope.

- Waste and sewage management with provisions for recycling and selective waste collection should be addressed by the Plan.
- There needs to be much greater co-ordination between government departments with better programming of roads, water, sewage and infrastructure works.

- **Alternative Energy**

Most of the discussion on alternative energy centred on the proposed wind farms in the Northern area. While everyone agreed that there is an urgent need to generate electricity in a more sustainable manner, a few had reservations on the negative environmental impacts that could result from wind turbines being developed off the coast or on hill tops. Comments included:

- Wind turbines should be sensitively located to minimise the potential to become 'eyesores'. They should be located out to sea rather than on hill tops. There needs to be full public consultation on the issue before any decision on their location is taken.
- The benefits wind turbines could bring to local communities was questioned. Nonetheless it was noted that in Copenhagen the wind turbines have become a tourist attraction.
- Alternative forms of energy (including wind farms) need to be investigated further as they are preferable to the burning of fossil fuels or the use of nuclear power.

- **Diversification of Farming**

Farm diversification was perceived to be vital in the regeneration of rural communities but participants believe that the ability to diversify is increasingly difficult due to the lack of co-operation between government departments.

Frustration at how the planning system operates was also evident as participants outlined the problems experienced within farming communities seeking to diversify. Participants urged the Plan to support and encourage farm diversification within the rural environment.

Some mention was made of farmers who own land within environmentally-sensitive areas which is eligible for Department of Agriculture and Rural Development grants who are ironically finding it increasingly difficult to obtain planning permission for agricultural diversification schemes. This anomaly between two government departments and their respective policies was highlighted as a issue requiring urgent attention.

- **Telecommunications**

Participants, particularly those from rural communities, asked if the Plan could ensure that land is zoned to accommodate the location of telecommunication facilities throughout the Plan area. This, it was believed, would provide rural communities with access to basic services which is taken for granted within more developed areas and reduce the feelings of isolation experienced by these communities.

- **The Planning System**

Issues such as planning gain, planning policy, the accountability of Planning Service and the apparent inconsistency of Planning Service decisions were raised frequently at the public meetings. Comments included:

- The Planning Service should use planning gain more often to ensure developers give something back to the local community. The cumulative effect of new facilities, better sewerage or affordable houses would be invaluable.
- Planning gain can, however, encourage more development and costs can sometimes be passed on to the purchaser by the developer.
- The planning system is inconsistent and individuals very often feel frustrated by this. For example, mobile phone masts can be built on hills in rural areas yet individuals, it was said, cannot get planning permission for a house on land that they own.
- The planning process needs to be more accountable and more transparent - people need to know why decisions that affect them have been made.
- Reserved matters should be advertised and open to the full rigours of public scrutiny and retrospective planning permission should never be granted without public scrutiny.
- It would be helpful if the Planning Service offered a pre-application enquiry service.
- The Planning Service is too centralised - decentralisation could help and the concerns of local people may then be heard.
- Area Plan zonings should only be deviated from if it is in the public interest. The Development Plan and Development Control Teams must be more co-ordinated in their work.

- Brownfield targets, whereby 60% of new housing developments in areas with a population of over 5,000 must take place on previously-used land, are confusing and unachievable.
 - Planners could recommend that land is used for a particular type of housing and they could influence the housing market through the introduction of minimum space standards.
 - Planning legislation is not strict enough and enforcement is poor. The public believe that the Planning Service is ignoring Planning Policy Statements and it appears that policy is often developer-led. Coastal areas in particular are suffering from the lack of a more stringent policy and enforcement.
 - Third party right of appeal (where objectors to a planning application, for example, can appeal a final planning decision) is needed.
 - Developers are aware of the loopholes in planning law and regulations and are able to capitalise on them.
 - Some believed the consultation is a worthless exercise unless the Planning Service takes the findings on board and the Area Plan can have a greater impact and influence.
- **Sustainable Communities**

Many participants expressed their frustration at the narrow focus of the planning system and how it is confined to land use issues. Instead many recommended an integrated and holistic approach to development planning with the system having the ability to examine the inter-related issues of social and economic sustainability and the impact that planning is having on the lives of people in the communities affected. The main issues raised included:

- No thought is being given to the sustainability of communities and everything that a community needs to survive - housing, facilities, employment, reduced traffic levels and improved public transport.
- The planning system needs to take account of the social and financial economy of a community and how one planning decision can have serious effects on a resident population. For example, redevelopment of a hotel as apartments results in lost employment, loss of a community facility and potentially impacts on the social structure of that community with the emergence of a seasonal population occupying a percentage of these apartments as second homes.
- The planning system involves an element of market forces and policy engineering but the more important issues of housing, employment and sustainability are related and inter-dependent.

- **Equality Issues**

Some people believed that the RDS is unfairly concentrated on urban areas and major transport routes, and because the Northern Area Plan will have to conform to the RDS, much of the Northern area itself will be disadvantaged as a result. Others suggested that any TSN measures will be based on the findings of the Northern Ireland Multiple Deprivation Measure 2001 (NISRA) Report (often referred to as the Noble Report) which, they said, is primarily an urban-based deprivation analysis. They believed that government departments will allocate expenditure based on this data and the Northern area will thus not be a high priority.

- **Other Issues**

Many issues and comments raised by participants did not fit easily into the above sub-headings. For simplicity these are reported below:

- Consultation should be taking place between government departments to tackle the inter-related issues of sustainable communities, tourism and declining agriculture - the Assembly has a pivotal role to ensure that the Area Plan tackles all these issues accurately and adequately.
- Unfinished building projects are left as 'eyesores' - the planning system could impose conditions stipulating that building work must be completed.
- The road and transportation system in the Northern area will only improve when government invests substantially in an upgrading programme and bases future expenditure on principles of sustainability.
- Rates should be charged on empty properties to act as a deterrent to property owners who leave them vacant.
- Councils are often instrumental in exacerbating certain planning issues - on occasion, it was said, they sell land to developers who then build inappropriate developments or they sell community facilities and buildings for redevelopment schemes.

Locational Issues

Ballymoney Borough Council

- **Apartments and Second Homes**

Participants voiced concerns over the recent trend in the development of second homes and that this could become an issue in Loughgiel. If the price of properties within settlements along the Antrim Coast increases further people will look at inland settlements such as Loughgiel as potential holiday locations.

- **Affordable Housing**

There is a need for affordable housing in the small settlement of Killyrammer.

- **Housing in the Countryside**

The need to protect the countryside was acknowledged but participants drew attention to members of the farming community in Loughgiel who want to live in the countryside and experience difficulties in obtaining planning permission.

- **Housing Allocation and Growth**

It was acknowledged that the settlements of Cloughmills, Dunloy, Dervock, Stranocum and Bendooragh have grown in recent years. However concerns were expressed that this growth tends to change the character of small rural settlements and participants urged the Plan to protect the distinct identities of rural communities.

Whilst some participants stated that the future growth of Bendooragh should be restricted to protect its rural character, they also mentioned that the Cabra Court development should be included within the development limit.

Suggestions were made for housing zonings on land west of Our Lady of Lourdes High School in Ballymoney town and on land east of Mill Town Road.

Some participants asked if the Rasharkin development limit could be extended along Finvoy Road and Craig's Wood as these were seen as natural extensions of the village with the latter having the necessary infrastructure in place to sustain future growth. Other locations in Rasharkin considered suitable for new housing included land just outside the current development north of St Mary's Church, on land immediately west of St Patrick's Primary School and within the development limit east of Riverdale.

It was suggested that new housing could be developed within the existing development limit east of the Dervock River and on the Bridge Road opposite

Hillside in Dunloy. Participants also suggested extending the development limit at Willowbank Terrace in Stranocum to provide housing.

An area within the existing development limit to the south of Loughgiel was suggested as a suitable location for family housing.

Some reference was made to the fact that Loughgiel, Killyrammer and Finvoy could accommodate further expansion and growth and that the latter two could benefit from more development in general.

Reference was made to the RDS housing allocation figure of 3,100 units for the Borough and participants were keen to know how this figure would be adjusted to take account of developments completed since this figure was published in 1998.

- **Other Housing Issues**

Some participants expressed concerns that as a result of the demand for new housing in Loughgiel the rural character of the settlement could change. The need for sheltered accommodation in Loughgiel and Stranocum was highlighted with cases cited of older people having to leave their community because accommodation is not available locally.

- **Town Centres and Retailing**

The importance of local retailing was recognised and participants asked that the Plan facilitate the development of Ballymoney town centre. Some participants were keen to see any new retail proposals for Ballymoney town centre directed to brownfield sites. A site along Linenhall Street was suggested as an ideal location for such development as was an opportunity site in John Street.

- **Tourism**

The tourism potential of Rasharkin was highlighted occasionally with statements that Drumbolcan Wood and the area around the Broadstone at Craig's Wood should be developed as tourism projects which could include walking routes, history trails and other facilities. Reference was also made to the potential for woodland walks in the Drumvale Drive area of Bendooragh.

- **Roads and Transport**

The need for improvements to the road network within Ballymoney and the west of the Borough in particular was identified. Participants believe that the town of Ballymoney would be more attractive as a commuter town if the road network was improved and said that the dualling of the A26, particularly from Ballymoney to Glarryford, should be given priority consideration as this in turn would help to improve links to other rural areas.

Some participants said that public transport services in the Borough, particularly in rural areas such as Killyrammer, Rasharkin and Stranocum, are infrequent and unreliable. However reference was made to private community transport schemes which, in their opinion, have been quite successful in rural areas. Participants did highlight, nonetheless, the need for the community bus services to be linked to other key services in the Borough.

Participants asked the Area Plan Team to consider the encouragement of walking and cycling schemes within Rasharkin.

- **Industry and Employment**

Concern was expressed about the lack of employment opportunities within Ballymoney Borough. Participants said that the Plan needs to support and encourage local employment opportunities within all settlements. Land near the Joey Dunlop Centre in Ballymoney was identified as a suitable location for what is perceived to be a much-needed industrial development. Land east of the Garryduff Road Industrial Estate was also considered suitable for industrial use and land north of McArthur Avenue was suggested as a possible zoning for business units. The need for local employment initiatives in Rasharkin was also highlighted as was the need for new industry along the Coleraine Road in Loughgiel.

- **Natural Environment**

A range of environmental issues was raised which included: the need to afford greater environmental protection to some locations in the Borough; the need for adequate protection of the Lignite Policy Area in Ballymoney and the Garry Bog; and the benefit of ensuring that the green space and wildlife provided by the Leslie Hill Estate is protected for future generations to enjoy.

Participants said that there are many attractive valleys within Ballymoney Borough which the Plan should seek to protect. Both Ballymacaldrick Hill and Lough Naroon were identified as special environmental features within the Borough which could be enhanced and enjoyed through the development of walkways and tourist facilities.

It was suggested that a community woodland area could be developed within the development limit north of the Manse in Dervock.

- **Built Environment**

Some participants identified the need for the designation of an Area of Townscape Character within Ballymoney town which could act as a facilitator for growth, conservation of the built environment and regeneration of the town, although others realised that the existing Conservation Area designation should be doing this already.

- **Community Facilities**

The need for new and improved community centres and additional facilities to cater for the needs of young people in Rasharkin, Balnamore, Bendooragh, Dunloy, Killyrammer, Dunaghy and Stranocum, was emphasised at the meetings in Ballymoney. Concern was expressed about the threat of closure to the community centre at the lower end of Ballymoney town as a result of a proposed retail scheme. Some participants said that land for a community facility could be zoned east of Westoncraff Avenue. There was also a call for more public parks to be provided within the Borough.

Participants at the Rasharkin consultation event asked for the zoning of some land that could house a recycling facility. They further suggested that such a facility could be located at the edge of the village.

Ballybogy, Glebeside and Carnany need community facilities and better play facilities for young people within their respective communities.

There is potential to develop formal open space on land between Leaney Primary School and the Ballymoney River and land to the west of the Primary School could be developed as a car park.

- **Recreation and Open Space**

Participants said that the Tesco proposal and the potential redevelopment of the cricket ground would result in the loss of vital recreation and open space in Ballymoney. Referring to PPS 8 which encourages the protection of open space, participants urged that the cricket ground be retained as a site of historic and sporting importance. They also asked that the bowling green at Megan Park and the Route Hospital in Ballymoney be protected and enhanced through Area Plan designations and policies.

Additional recreational space was called for on land between Greenacre and McClelland Park in Dunloy.

- **Infrastructure**

Infrastructure was said to be inadequate and until this is upgraded, new developments should be encouraged only within the southern and western confines of Ballymoney town.

Concerns were expressed that Dunloy would be unable to cope with additional development because of an inadequate drainage system.

- **Alternative Energy**

Drumbolcan Hill near Loughgiel was identified as a suitable location for wind farms - this could help with sourcing environmentally-friendly forms of energy and could serve as an attraction and local landmark within the Borough.

- **Other Issues**

Participants suggested that every town and village within the Borough should have some land zoned for retail and industrial use to reduce the need to travel.

In terms of opportunity sites land east of St Patrick's Church in Loughgiel was identified and asked for protection within the Plan.

Coleraine Borough Council

- **Apartments and Second Homes**

Many participants at outreach events, planning information sessions, public meetings and drop in sessions were concerned and frustrated about the rise in the number of apartments and second homes in places such as Portstewart, Portrush, Castlerock and Portballintrae. There are, it was said, two main problems associated with this type of development. Firstly, the physical character and sense of place (which is why the area is popular) in towns and villages has been destroyed. Secondly, because so many of the apartments and second homes remain unsold or unoccupied for substantial parts of the year, the social and economic fabric of these settlements is quickly disintegrating. Numerous comments were made on this issue, including:

- There are too many apartments and second homes in Portstewart, Portrush, Portballintrae and Castlerock.
- There is concern over the rise in number of houses in multiple occupancy in Coleraine, Portrush and Portstewart.
- Only 50% of housing units are occupied by local people in Portstewart and this has affected school numbers.
- The majority of new developments in Castlerock are holiday and second homes. The policies for the future should state that there should be no more second homes in Castlerock and that any new build should be for residential use.
- If the current trend continues Castlerock will continue to decline and will gain a reputation as a retirement village.
- Many beautiful views have been obstructed by four- and five-storey apartments in Portstewart and Portrush.
- The local economy of Portrush will decline if apartment developments continue to dominate the town.
- Many apartments that have been built in Coleraine are still empty. Many people said people who live in apartments contribute little to the local economy.
- Portballintrae has been destroyed by apartment developments. There is a surplus of apartments in the village yet building continues.

- In the early 1990s the Planning Service said that hotels would no longer be redeveloped into apartments or nursing homes, yet this continues to happen in Portballintrae.

- **Affordable Housing**

Participants said that there is a real and genuine problem with affordability in the housing markets in Coleraine, Portstewart, Portrush, Castlerock and Articlave. Comments included:

- There is a need for starter homes in Portstewart.
- The Plan should designate areas in Portrush for affordable family homes.
- There is a need for affordable homes in Ballyhackett and Articlave.
- Apartments in Portstewart are not perceived to be affordable.

- **Social Housing**

There was a call for social housing to be provided in both Castlerock and Portstewart to meet local need. This need was also expressed in relation to Ballyhackett.

- **Housing Allocation and Growth**

The RDS allocation of 5,800 units for Coleraine Borough was a much-debated figure throughout the consultation. The majority of people said new housing should be evenly distributed throughout the Borough but stressed the importance of accurately knowing how many houses have already been built since 1998. Much of the discussion centred on where new housing growth should, or in many cases, should not be distributed:

- Cromore House beyond the Portstewart development limit was identified as an ideal location for new development and the potential for some infill housing was identified along High Road and on vacant land either side of Station Road. A few participants believed that there should be no further extension of the Portstewart development limit, particularly with the proximity of Portrush. It was stated that these two settlements need their own separate identities.
- There should be no further development in Portrush: along Bath Terrace; along the harbour area from Castle Erin Road towards West Bay; and along the Coast Road particularly to the south of Ballyreagh and Dhu Varren Roads. If necessary, the Portrush development limit should only be extended inland and not into the AONB.

- Castlerock is potentially at its limit and additional development will further compromise the sustainability of the community. In addition the inadequate sewage system does not lend itself to new development and therefore there should be no extension of the Castlerock development limit.
- The development limit in Castlerock should be tightened to exclude the caravan park so that it is not developed for housing and development should not be permitted west of School Lane.
- In the past two years at least 100 new houses in Articlave and about 200 units (mostly apartments) in Castlerock have been built. Residents do not want to see the area over-developed and stressed that villages such as Articlave need to retain their own identity and not merge with other settlements. Numerous derelict houses could accommodate some of the housing allocation if they were refurbished.
- New houses could be developed in Coleraine beside the new hospital site and at the south of the town within the existing development limit.
- The settlement of Maybuoy could sustain more houses, but the importance of preserving its identity should be promoted through the Plan.
- The need was identified for some new housing in Aghadowey.
- The Drumane area of Kilrea was suggested as a suitable location for new housing.
- The old hospital in Coleraine was identified as an opportunity site which could be redeveloped to provide student accommodation, sheltered housing or apartment units.
- The development limit in the small settlement of Moneydig should not be extended and no more houses should be built there.
- The development limit in Portballintrae should remain unaltered in the new Area Plan.
- Rural settlements such as Milltown and Bovedy were said to be in need of new housing.
- Land to the north east of Macosquin (between Dunhill Road and Dunderg Road) could be zoned for housing.

- **Housing Design**

It was recommended that careful consideration be given to the rear design of buildings which face the sea. Each town and village in the Coleraine Borough, it

was stressed, has its own vernacular character and the following types of housing would be suitable: (i) Portrush - terraced housing is typical and should be kept; (ii) Portstewart - seaside villas and semi-grand terraced housing is typical, (iii) Castlerock - characterised by large houses which are lower density, and (iv) Articlave - typified by small rural dwellings.

Participants referred to the Liffock development in Castlerock along Sea Road and stated that it is poorly designed, inaccessible and has no green space or a children's play area. They added that there are no play areas within housing developments in Castlerock and surrounding settlements and that the social damage of this has already been done.

- **Other Housing Issues**

Other housing issues included:

- Derelict housing near Golf Park at Landsdowne Crescent in Portrush should be zoned for family housing.
- The Castle Walk site in Castlerock was identified as an ideal location for sheltered or fold accommodation.
- There is a need for housing for older people in Portstewart, especially with the closure of Carricknacule residential facility.

- **Town Centres and Retailing**

Many participants were in favour of the Plan strengthening the role and function of Coleraine town centre. Some of their ideas and views included:

- One of the main problems in Coleraine is the lack of vitality in the town at night. Reading in England experienced similar problems but is now full of life in the evenings. One of the reasons for this was that parking spaces in the town were reduced from 1.5 to 0.2 (per vehicle). This had the effect of more people using public transport and staying longer in the town centre in the evenings.
- Development of the remaining key sites in Coleraine should be done sensitively and should target the leisure sector and evening economy (restaurants for example). Also taxis should be allowed into the town centre at night to help bring vitality to it. If trade deliveries were restricted to evenings, Coleraine town centre would be much less congested during the day.
- The retail core in Coleraine needs to be enlarged to make it more vibrant. Currently the town centre is restricted to one street. An entertainment centre and high quality department store are lacking in Coleraine. Scope exists for retail development along the ring road in the town.

- The location of large retail outlets in Coleraine puts local businesses under immense pressure in areas such as Portstewart, Kilrea and Garvagh.
- Portstewart residents were worried that the shopping area in the town will be lost to apartment development and also mentioned that development of further amusement arcades should be curtailed and that retail developments should be restricted to the peninsula area in Portrush.
- There was serious concern that the increase in second homes and apartments in Portstewart and Portrush will negatively impact upon local shops and businesses as owners of the properties visit infrequently.
- A lack of co-ordination between government departments and agencies has negatively impacted upon small businesses.

- **Tourism**

There was a suggestion that the Coleraine Borough does not attract as many tourists as it should and even when visitors do visit, facilities are not adequate enough to ensure extended stays. Whilst it was agreed that the environment should be protected, the need to further develop the tourism potential of the area was acknowledged. Comments included:

- Caravan sites in Castlerock are well looked after but the village does not need any more. The caravan site could be re-designated within the AONB or reverted back to Castle ownership. In addition, holiday makers do not bring trade to Castlerock because they do not shop locally and participants highlighted that tourism cannot be sustained in the village until the sewage problem is remedied and hotel and restaurant facilities are improved.
- The tourist industry in Portstewart will struggle due to the lack of accommodation in the town.
- The Planning Service insisted that a hotel be built on the Northern Counties Hotel site in Portrush but it was not large enough and participants felt the chance to develop an excellent hotel facility was missed.
- The river in Coleraine has good tourism potential. Facilities and attractions such as a hotel on the scrap yard site and boat trips up the Bann could be developed and the Mountsandel area and Kilrea Wood should be improved as tourist attractions.
- There is potential for tourism development and growth in Ballyhackett and there is a need for dedicated walking routes in Articlave.

- Good public transport and the provision of cycling and walking paths would encourage the development of tourism in Garvagh and other rural settlements.

- **Roads and Transport**

There were many issues raised relating to roads and transport in the Coleraine Borough including problems of congestion, the poor state of the roads and inadequate public transport.

These included:

- More car parking and parking for coaches is needed in Coleraine town centre. Residents' parking is also needed in the town because commuters are using most of the spaces. There was opposition to a plan to bring traffic into the centre of Coleraine. A bus lane in Coleraine town centre may help ease congestion.
- Traffic congestion is a problem in Portstewart and the town should not accommodate new housing because the roads infrastructure cannot cope as it is. A better town bus service is needed but will not be sustainable without a healthy permanent population.
- There was concern over the one-way traffic system in Portrush. Although attempts have been made to manage the traffic more effectively a number of small businesses have closed as a result of changes in the road network. Reference was also made to the general economic decline in Portrush and the fear that it may be too late to reverse the trend.
- Traffic was identified as a problem in Articlave and participants said that consideration should be given to introducing a pedestrian crossing, traffic lights or some other type of traffic management scheme into the area.
- Public transport servicing the villages of Macosquin and Maybuoy is infrequent and in Ballyhackett was described as 'non-existent' with the school bus service being identified as the only service in operation.
- The Plan could facilitate the creation of more walkways in Ballyhackett and consider linking these into the Ulster Way.
- More off-street parking is needed in Portstewart and a site for a possible car park was identified at the old Baptist church site on the Strand Road. Traffic controls are also needed along the Agherton Road.
- The current road system in Portrush is inadequate and must be upgraded before any further housing is developed. The development towards Magherabuoy for example needs to be serviced by better roads.

- The quality of roads, it was said, is adequate along the North West 200 circuit but poor everywhere else in the Borough.
 - An emergency route for vehicles through Portrush was proposed via Dhu Varren, West Bay, Castle Erin Road and the west side of the wall along Kerr Street because of the congestion problems there. A site at the Harbour Court development was seen as being suitable for a multi-storey car park and there was a call that to improve the 'Portrush Puffer' to provide a more efficient service. Some said that Main Street could benefit from being pedestrianised.
 - A one-way traffic system is needed in Castlerock especially in the summer. Roads that could be involved in the scheme included Main Street and the Freehall Road. However, some participants were opposed to the idea of upgrading the Freehall Road.
 - The quality of roads and the provision of car parking needs to be improved in Castlerock. Participants were keen to point out that public transport and the provision of railway services is very important for Castlerock. A community bus or post van system was said to have potential in the surrounding area.
 - The Portballintrae area needs a better transport system, perhaps one similar to the Causeway Coast service.
 - The River Bann has a role to play in facilitating alternative modes of transport, such as river taxis.
 - An improved east-west transport corridor serving Garvagh is needed to encourage people to travel to other rural areas. Concern was expressed about the build up of traffic in Garvagh and other small settlements like it.
 - Not enough funding for cycling routes has been directed towards rural areas. Only towns such as Coleraine, Portrush and Portstewart appear to have benefited from such schemes.
- **Industry and Employment**

Participants believed Coleraine needs more local employment because at present it is mainly a commuter town. It was suggested that new industry would have a 'snowball' effect of encouraging more housing development and improved retail facilities for the town. Reference was made to the potential of the old hospital buildings in Coleraine as a site for new businesses. A number of people doubted whether industry and businesses could be sustained in Portstewart due to the lack of a sustainable community in the town. Participants also highlighted the lack of industrial space in Garvagh and Kilrea and mentioned that Macosquin would benefit from zonings for new industry and business.

- **Natural Environment**

Participants believed that the Coleraine Borough has much to offer in terms of natural assets - coastal areas, rivers, wildlife habitats - but that their attraction is being compromised in many instances by the reality and threat of inappropriate developments. Wide-ranging comments included:

- Building near the river might affect the flood plains south west of Portstewart and there should be no development to the south of Portstewart as it will affect the ecology of the Bann and the surrounding area.
- There is tipping along the shoreline near the Berrins in Portstewart and the coastline must be better protected. The Old Plantation is in need of protection.
- People argued that Portrush and Portstewart must be included in the AONB along this part of the Antrim Coast and that at least in this way the entire coastline is afforded greater protection.
- All open space on the seaward side of the Coast Road in Portrush should be protected as there is concern that amenity land at West Bay, Portrush will be lost to Seaport Investments and that the valuable natural beach area of Portrush will be threatened by future development.
- Environmental space in Bath Street, Portrush should be protected.
- Castlerock residents want an environmental statement included in the Plan that will give an assurance that the built and natural environment of the village will be protected.
- There is little evidence that the principle of conservation of the landscape has been adhered to in Portballintrae.
- Participants from Garvagh want the Plan to identify pockets of natural historic importance in the area and to protect its rural character. Enhancement of Garvagh Forest would contribute to its attraction as a tourist facility.
- Somerset and Mountsandel Forests in Coleraine should be protected by the Plan as should the raised bogland at Ballynahone Bog and Macosquin River.

- **Built Environment**

Participants were of the opinion that historic buildings, facades and Areas of Townscape Character within the Borough should be afforded much greater protection. If a historic building is demolished, they said that any rebuild

should be of a similar type to help maintain the character of an area. Other views mentioned included:

- Rock Castle in Portstewart was a listed building yet was demolished without planning permission. One suggestion to overcome this problem is to refuse planning permission on the site for 25 years or charge a percentage of the total development cost as a penalty.
- There is some opposition to a marina development in Portstewart.
- The Victorian facades in Portrush should be maintained and the town should be characterised by two-storey developments.
- Garvagh should be designated as an Area of Townscape Character and a Conservation Area.
- The Workhouse on the old hospital site in Coleraine should be retained because of its historic importance.

- **Community Facilities**

Several participants were in favour of improving community facilities in Castlerock provided this is done on a sensible scale which is suitable for the village. Others lamented the loss of Castlerock swimming pool which they regarded as a valuable community facility. Comments included:

- By selling the swimming pool in Castlerock for redevelopment the apartment and second home problem has been exacerbated.
- Only one play area exists for children in Castlerock and there is a need for new facilities for teenagers in the village.
- Bushmills needs its own amenity site, whereas Portballintrae needs a new location for its amenity site.
- There are no facilities for young people in Maybuoy - developing youth club facilities would facilitate integration of young people into the community.
- More facilities for young people are needed in the Garvagh area and the Area Plan should zone more land for community spaces.
- Adequate facilities for young people within the settlements of Articlave and Castlerock may eliminate elements of anti-social behaviour.
- The waste ground beside the existing football pitches in Articlave was identified as an ideal location for a new community hall.

- An area of land at St Mary's Church, Milltown should be zoned for a community facility. Potential was also identified for a community facility development at the Glebe Road and Artidillon Road junction.
- More recreational facilities are needed in Aghadowey, suggestions included a park, picnic area and football pitch.
- Illegal dumping was identified as a serious problem in Articlave.
- Provision of a civic amenity site and recycling facility in Articlave should be encouraged.
- An area of land beside the new primary school in Macosquin should be zoned for community facilities.
- **Recreation and Open Space**

The Planning Service was urged to zone more land for recreational use throughout the Borough and to better protect land zoned for amenity use from previous plans. Most of the comments recorded related to Portstewart and Portrush and included:

- All remaining open spaces in Portstewart should be maintained and more land for recreational use, especially for young people, should be zoned in the new Plan.
- Portstewart residents were in favour of the following sites being zoned for amenity use: Flowerfield; land at the junction of Strand Road and Burnside Road; and land to the south of Mullaghacall Road.
- In Portrush the 'Bowl', Metropole Park and land east of Mill Strand beyond the car park should be protected as amenity land.
- 'Orangefield' in Garvagh should retain its open space zoning.
- A strip of land bordered by St Mary's Church and the river in Macosquin could be developed as an environmental and recreation area and the land between Ramsey Park and Farranseer Park should be retained as open space.
- The potential for recreational space was identified at Kathleen's Lough and Washing Lough in Kilrea.
- Opportunity exists for zoning of land on the Lisnablagh Road in Coleraine town for outdoor sports and recreational use.
- More green areas are needed in Castlerock. The moor and land east of School Lane should be protected as open space as should the caravan site if it closes.

- Land at the end of Woodend Park in Articlave could be developed as a small park and should therefore be protected in the Plan and more land should be zoned for recreational space in the village.

- **Infrastructure**

Much of the debate at the public meetings in particular focused on inadequate sewerage in the Coleraine Borough with Castlerock singled out as an area which requires immediate improvements. Comments included:

- Raw sewage is being discharged into the sea at Castlerock and it is unsafe for children to play in the area.
- Because upgrading the sewerage may take ten years there should be an embargo on development in Castlerock until the upgrade is complete. In addition, families will not want to settle in Castlerock until the sewerage issue is addressed.
- Concern was expressed about sewerage capacities in Coleraine and Portstewart and that sewage may soon discharge onto Portstewart strand.
- Roads and sewerage infrastructure in Macosquin needs to be improved.
- Poor drainage along the Main Street in Articlave was said to cause severe flooding.

- **Alternative Energy**

Participants were not against the provision of sustainable energy but remarked that the coastline off Castlerock is not a suitable location for the proposed wind turbines.

The River Bann could be used for generating electricity in an environmentally-friendly manner if the Plan can facilitate this.

- **Sustainable Communities**

A number of participants feared that some areas are experiencing irreversible social and economic decline, largely due to the proliferation of apartments and second homes. Views expressed included:

- Castlerock residents would like to see a "thriving community".
- To prevent further destruction of Castlerock the Plan should designate it as a Conservation Area or an Area of Townscape Character to sustain the life, character and future of the village.

- Portballintrae is no longer a sustainable community.
- The social and economic structure of Portstewart is disintegrating as is the case in Portrush.

- **Planning Issues**

The Plan should go beyond land use planning in terms of facilitating economic development for Garvagh and other similar rural areas.

- **Other Issues**

Other comments which are not necessarily planning issues were raised. These included:

- The development of many brownfield sites in the area is being delayed. The Strand Hotel in Portstewart is a good example of this.
- Castlerock residents are frustrated by what they regard as the intransigence of the planning system and the powerlessness of local communities to effect change.
- School numbers in Bushmills have been dwindling because the numbers of children coming from Portballintrae have been dropping over the years as the population moves away.

Limavady Borough Council

- **Affordable Housing**

Participants mentioned that there is a need for affordable (and social) housing in Ballyscullion and Magilligan as young people especially are leaving these areas and moving to Limavady town in search of houses they can afford.

The need for affordable housing was also identified in Foreglen and Gortnaghey.

- **Social Housing**

The need for additional Northern Ireland Housing Executive properties, particularly bungalows, in the Dungiven area was highlighted as was the need for social units in Foreglen and Gortnaghey.

- **Housing in the Countryside**

Difficulty obtaining planning permission for housing in the countryside throughout the Borough was mentioned. Benedy in particular was highlighted as a settlement where new housing is needed and where older (previously used) housing could be upgraded. Dungiven residents also said that many families in the countryside around Dungiven experience difficulties with planning policy when they try to improve and sustain their communities by encouraging their young people to stay and build in the area.

- **Housing Allocation and Growth**

The location of new housing and the growth of settlements featured strongly in the discussions throughout the Borough. It is an emotive issue and one on which varied comments and views were expressed. The range of comments referred mainly to locations which could or could not sustain growth and included:

- The north west edge of Limavady town would be suitable for housing if adequate infrastructure was provided.
- There is concern that Ballykelly could possibly 'link up' with Limavady if planning restraints are not imposed. Development should be controlled along the Loughermore Road in particular.
- The Ballykelly development limit could be extended although there are physical limits to its growth.
- Some land near the bypass is partly flood plain and should be omitted from housing zonings.

- The green belt could shift to the west of Limavady town and offer potential for new housing development on the western side of the River Roe.
- The southern boundary of Limavady town could be extended and land freed for housing. Similarly land to the east of the town is ripe for new housing development.
- New housing allocations should be spread throughout the Borough and not be confined to the main towns and villages.
- New housing could be zoned near Aghanloo Industrial Estate (particularly as employment levels increase) reducing traffic levels in and out of Limavady town.
- Shanvey and Bolea should not expand too much given their proximity to the Sperrins AONB. Bolea in particular was said to have experienced too much ribbon development and the village has grown in a linear pattern as a result.
- Drumsurn could accommodate further housing as could Killywool.
- Ringsend is in urgent need of more housing, as are Ballyscullion, Magilligan, Benedy, Foreglen and Dungiven (however little of the 21 hectares left for development in Dungiven is accessible).

- **Housing Design**

When referring to the style and design of recent housing developments in the Borough, many expressed concern that traditional house styles are not being used. The use of imaginative yet traditional designs in future housing developments was mentioned as a solution to this problem, with suggestions that the Area Plan could include a policy statement on this issue.

The plan should promote more careful landscaping of future housing developments in Burnfoot and Gortnaghey to enhance their visual appearance.

- **Other Housing Issues**

On occasion participants mentioned the issue of Dispersed Rural Communities calling for Benedy and Drumsurn to be considered for this designation. In the case of Benedy it was said that it had once sustained 110 families and will struggle to survive if planning policies do not assist and enable it to grow. Likewise Drumsurn was once home to 87 families and now less than half of these remain. Without active planning policies which ease the current restrictive planning system local people fear that Drumsurn (and other places with similar problems) will struggle to survive.

- **Town Centres and Retailing**

In the main, comments on this subject centred on the need to re-invigorate Limavady town centre. Specific issues raised included:

- Limavady town centre is in urgent need of new businesses, growth in the retailing sector and increased community and recreation facilities.
- The bypass scheme currently under way offers an opportunity to pedestrianise additional areas of Limavady town centre and to regenerate parts of the town which have become run down.
- Some participants believed that the south east of the town should not be developed.
- There has been recent growth in Dungiven and retail space in the town should be zoned in the Area Plan to accommodate current and potential expansion in this sector.
- Dungiven may become a dormitory town which would be unable to thrive if the proposed bypass scheme goes ahead.

- **Tourism**

Many positive views on the issue of tourism were expressed at the consultation events in the Borough. At the same time some participants had reservations about the actual benefits to the local community compared to the perceived benefits. Comments in favour of enhancing the tourism sector included:

- The need for generally improved tourist facilities including more bed and breakfast accommodation and footpaths especially in the north of the Borough.
- Benone (north of Magilligan) should be developed as a tourist resort with a sensitively designed hotel, chalets and perhaps a country park.
- Rough Fort has real tourism potential if the environment in this area is improved.
- The ferry service between Magilligan and Greencastle will enhance the tourism sector in the area (although the expenditure involved was queried by some participants).
- Cycling and walking facilities would encourage tourists to travel to the north of the Borough, use the ferry and avail of the facilities and spectacular scenery along the coastline at Magilligan and Benone.

- Walking and cycling holidays could develop if dedicated walking and cycling routes for tourists were facilitated by the Area Plan.
- A strip of land from Bellarena to Benone should be zoned for cycling.
- Myroe could benefit from river walkways, a picnic area and a footbridge, this would enhance tourist facilities in the area.
- The tourism potential of the Glenshane Pass was highlighted as was the Broharris Canal and its particular attraction for boating holidays.

Negative comments on tourism included:

- Planning policy (and government policy) generally appears to favour the development of tourism at the expense of local people, especially in the Glenshane area.
- Tourists coming to Benone caravan park contribute little to the local economy and exacerbate already difficult traffic flows - the further development of tourist facilities and the role the Area Plan plays in the future growth of this sector in north Limavady should therefore be carefully considered.

- **Roads and Transport**

Comments and questions relating to roads and transport were mainly confined to the subject of bypasses, traffic issues concerning Dungiven and Limavady and the particular traffic and pedestrian issues in the Magilligan area. The main comments included:

- Ballykelly and Dungiven need bypass schemes to tackle the high traffic levels.
- Dungiven suffers from particular traffic issues: the adverse effects of Protected Routes policy, being a through route for Belfast to Derry/Londonderry traffic, need for a pedestrian crossing in Main Street, problems with crossroad junction traffic, need for additional car parking facilities at the northern end of the town, benefits to businesses of introducing a one-way system, high traffic levels and emissions, the need for new traffic lights at the two main town junctions and the need for a train halt.
- Limavady town issues included: B69 (south of town) should be upgraded to connect to Drumraighland to overcome Baranilt Road congestion, public transport into and out of the town and/or Borough is difficult, unused train halts have a huge potential (especially for tourists), car parking is difficult to access at present, free car parking spaces should be provided in Main Street, more pedestrian zones should be provided when the bypass opens and land previously zoned for cycling should be retained.

- There is a need to construct a new inland arterial route to connect Strabane, Derry/Londonderry, Ballykelly, Limavady, Coleraine, Ballybogy and Ballycastle.
- The rural community in Limavady Borough is not well serviced by public transport, this is a particular issue in the Glenshane and Foreglen areas.
- Legavallon Road should not remain part of the Protected Routes Network.
- The train halt in Ballykelly should be re-opened.
- A cycle network in the Glenshane area would facilitate inter-connection of smaller rural communities.
- Walking and cycling initiatives could be introduced in the Magilligan area. Suggestions included: a footpath from Benone to the community centre and out to Swan's Bridge; segregated cycle paths throughout Magilligan; a walking and cycling route up to Magilligan Point; a walking route along the Upperlands Road and old railway line in Magilligan; redevelopment of the old walking route from Angler's Rest to the railway crossing at Umbra and dedicated walks along the old railway line from Point Road (near Benone) and along the Forest Road north of Shanvey (which leaves the A2 and joins the Duncrun Road).
- Limavady needs more cycle paths, for example along Church Street and Rathmore Road.
- If Ardgarvan is to be further developed, the road infrastructure should be upgraded first.

- **Industry and Employment**

Given the mostly rural nature of the Limavady Borough the need for the Area Plan to address and tackle the issue of enabling industries and small businesses to grow was often mentioned. For the most part it was the need for local employment opportunities that was highlighted. Issues included:

- Large numbers of the Limavady population have to travel outside the Borough to work (for example Belfast and Derry/Londonderry). The need for local, especially small scale, businesses is therefore substantial.
- Light industry should be located in the town of Limavady and not at Aghanloo - Aghanloo Industrial Estate is more suitable for heavy industry.
- A possible location for light industrial use is a site near the bus station in the town.

- Although there are large employers such as Seagate, Dupont, Hugo and Daintifyt, these are located outside the town (and sometimes even outside the Borough) and there is still a need for more localised employment opportunities.
- The perceived imbalance within the business area of Limavady town centre needs to be addressed - it would be desirable to spread future industrial growth throughout the town.
- Land westward from Limavady to Ballykelly could be developed for industrial use and Ballykelly itself has the potential to support industrial development.
- Industrial land should be zoned to the south of Dungiven off the Glenshane Road - this could be used for a new business park.

- **Natural Environment**

Various locations in the Borough, particularly along the coast, were highlighted as being worthy of protection and enhancement in the Area Plan proposals. Equal mention was made of cases of environmental damage and pollution. The range of comments on the subject included:

- There is substantial local concern about the pollution (both water and airborne) caused by Dupont.
- There is pollution in the Bellarena area where the railway line crosses the River Roe.
- Ballspoint (near Magilligan) is an environmentally important and very beautiful area yet it suffers from instances of pollution and illegal dumping when it could be developed and enhanced as a unique wildlife and nature conservation site.
- Coastal erosion in the Magilligan area could be caused by the development of the new marina facility at Ballykelly.
- The coast at Ballyscullion is eroding.
- Benone Beach, which has ASSI status and is a premier Blue Flag beach, should be better protected.
- Environmental protection provided by the green belt around Magilligan is a positive planning aspect and one which is helping to protect the unique environments in this area.
- Ballykelly Forest is in need of more protection as is Ballykelly River.

- The Bells Hill area in Limavady should be protected for its environmental amenity.
- Landfill sites in Dungiven are at capacity and are currently causing problems for the environment and the health of the local population.
- The forested area south of Dungiven sewage works should be protected.

- **Community Facilities**

The need for additional community facilities in specific parts of the Borough was highlighted at several meetings. Comments included:

- There is a need for a community facility in Benedy.
- Magilligan would benefit from a purpose-built community hall.
- A new amenity site is to be built at Aghanloo but residents believe this will be inaccessible to many residents and that Magilligan needs a similar facility.
- Community facilities in the small settlement of Gortnaghey are not adequate.

Overall participants queried whether the above issues could be resolved through zoning of appropriate land in the Area Plan.

- **Recreation and Open Space**

Local people asked the Area Plan to protect current recreational facilities and areas of open space in the Borough through zonings and designations. In particular they mentioned the playing field in Magilligan and the land around the local school in Dungiven which, it is felt, should be retained as recreational space.

The country park in Limavady, it was mentioned, is in need of enhancement to include walking and cycling routes along the river. An area of open space in the town beside the health clinic and the old graveyard on Scroggy Road should be kept as open space. Similarly the playing field on Rathbeg Drive should be retained as recreational space. A recreational area was also said to be needed in Bolea.

The need for more park land in Ballykelly was mentioned. Suggested locations for urban parks included land at Walworth Road and beside Glasvey Special School.

- **Infrastructure**

Numerous comments and concerns were expressed about inadequate infrastructure in the Borough. The sewage and water system in particular were said to be in need of urgent attention. Comments included:

- The sewage system throughout the Limavady area needs upgrading.
- Upgrading of the town's sewage system could be undertaken during the construction of the Limavady Bypass and could be located at Ballykelly for example, thus catering for the needs of both towns.
- There are specific problems with an inadequate sewerage capacity in the area from Benone to Downhill.
- Septic tanks take the place of a comprehensive sewage system in Dungiven and this should be addressed.
- Minor roads throughout the Borough flood in heavy rain because of an inadequate water drainage system.

- **Alternative Energy**

Although many participants could see the benefit of introducing alternative forms of energy into the Borough it was mentioned that while the Glenshane area would be a natural location for this because of its topography, this could spoil the area's natural environment and vistas. A balance between need and the environment was therefore recommended.

- **Other Issues**

While aware of the planning restrictions in the Glenshane Pass area several participants noted that there appears to be a substantial amount of development in this part of the Borough and queried how this had happened in a restricted policy area.

Locating mobile phone masts near residential areas was seen as a problem in the Benedy area.

Participants said that Carn should be recognised as a small settlement and that both Benedy and Aghanloo should be designated as Dispersed Rural Communities.

Moyle District Council

- **Apartments and Second Homes**

The majority of people who took part in the consultation expressed strong views on the recent rise in the number of apartment developments in the Moyle District. A range of opinions was given, on the whole, in opposition to these developments which were seen to cater for the second home owner rather than the local market and were often considered to be inappropriately located. Concern was often expressed over the effect these developments is having on the sustainability, balance and social structure of their settlements. Comments included:

- The recent rise in the number of apartment developments and second homes was identified as a particular problem in Ballycastle, Cushendall, Cushendun and Portballintrae with statements that more than 50% of new development in Ballycastle caters for the second home market and that a worrying trend is developing in housing estates in Ballycastle where Housing Executive properties are being bought as second homes.
- The number of apartments and second homes in villages and small settlements are compromising their sustainability. People using apartments and second homes, it was stated, bring very little economically or socially to these areas and as a result schools and businesses can eventually close. It was noted for example that Portballintrae no longer has a shop.
- An apartment development has been approved in Ballintoy when there are still properties for sale in Portballintrae.
- Apartment and second home developments are having a negative impact on the amenity of Ballintoy, Portballintrae and the Giant's Causeway in particular.

- **Affordable Housing**

Participants at meetings throughout the Moyle District highlighted a number of locations where there is a need for affordable houses. Reference was made to the fact that local people have difficulties buying affordable houses especially in Ballycastle, Bushmills, Cushendall and the Giant's Causeway.

- **Social Housing**

The issue of social housing was raised a number of times during the consultation. While it was recognised that there is a need for social housing it was suggested that it should be sensitively located. Comments included:

- Cushendall needs and has the scope to sustain further social housing developments.
- There was cautious recognition of the need for social housing in the Causeway and Bushmills area with people remarking that social housing should only be developed in suitable locations.
- Armoy, Armoy Glen, Fairhead, Cushendall and Cushendun need new social housing units.

- **Housing in the Countryside**

There was general agreement among participants that it is very difficult to get planning permission for houses in the countryside. The rural areas around Cushendall and Ballycastle were identified as areas with a particular need for more housing, but where planning permission is not often granted. People expressed their frustration at how it appears to them that tourism developments are granted planning permission in the Ballycastle area more readily than houses.

- **Housing Allocation and Growth**

Differing opinions on the ability of settlements to accommodate further growth were expressed. Comments included:

- Only small scale developments would be appropriate and welcomed in both Glenariff and Cushendall.
- The development limit of Armoy should not be extended except for an area to the west of the main road through the village.
- Future developments at White Park Bay should be restricted to those which meet local needs.
- The development limit in Ballycastle should be extended towards the Dunamallaght Road.
- Moyle District Council area has been allocated 1,400 dwelling units which is approximately 90 per year for the life of the Area Plan. Forty apartments were recently built in Cushendall which participants noted was almost half of the allocation for the whole district for one year. Participants asked if the Planning Service would therefore be using these figures to refuse any further housing developments in each settlement or in the District as a whole.
- Waterfoot has reached its limit in terms of housing growth.

- **Housing Design**

Residents in Ballycastle expressed their concern over the design and location of recent developments in the town. They said that some new houses break the skyline, which they argued is not appropriate in an area of high scenic value. It was also noted that a number of the new developments are too dense, have no play areas and appear to lack any design concepts.

- **Other Housing Issues**

Reference was made to the number of planning applications within the Moyle District which have been refused on the grounds of ribbon development. Some participants found this explanation difficult to accept stating that both clachans and strip development are traditional Irish settlement patterns.

- **Tourism**

There was debate on the future of the Giant's Causeway and the impact of recent planning decisions on the tourism potential of the whole District. Comments included:

- Participants from Cushendun expressed their dismay at the decision to demolish the Bay Hotel for apartment development. It was suggested that a condition of the planning permission should have been to provide a small hotel on the site with the apartments - a hotel in Cushendall, it was stated, would have been a valuable community facility as well as attracting tourism to the village.
- The tourist facilities at the Giant's Causeway and at Dunseverick Castle are inadequate and require significant investment.
- The Plan should consider promoting the tourism potential of the White Mine area in Ballycastle and improving facilities along the Tow River (from Fairhill Street to the seafront) to include a walking and cycling route, planting and a picnic area.
- More tourist development should be located in Bushmills rather than at the Giant's Causeway, with reference made to other countries where environmentally important tourist destinations are left undeveloped and people are taken to them by bus while staying in accommodation in nearby towns and villages. In this respect it was suggested that future tourist developments (hotels, park'n'ride etc) should be located in Bushmills.

- **Roads and Transport**

Much of the discussion on transport and roads in the Moyle District centred on the level of traffic, especially in and around the main tourist destinations and how this could be alleviated. The main issues raised included:

- Cushendall is a travel to work area for Ballymena and it was noted that the road into Ballymena is in a poor state of repair and therefore needs urgent maintenance.
- Traffic congestion around Ballycastle town centre is an issue and although a one-way system in the town especially in Castle Street might alleviate the problem, business owners might object.
- The roundabout at the junction of Ann Street and Rathlin Road in Ballycastle has added to the congestion problems and further growth in housing or tourist developments would only serve to worsen the congestion.
- Ann Street in Ballycastle should be pedestrianised or made one way for traffic. Vehicles could be re-directed up Rathlin Road and down Chapel Bray.
- There is a need for more central parking in Ballycastle, particularly parking for people with disabilities.
- There are congestion and parking problems in Bushmills. The village could benefit from a one-way system (for example Main Street, past Bushmills Primary School, Church Street, Bridge Street, Priestland Road and Dunluce Road).
- There is a need for a coach and car park adjacent to the train stop which connects Bushmills to the Giant's Causeway.
- The railway line should be extended as far as Bushmills village centre.
- Public transport is not a viable option in places such as Bushmills but Translink could develop the Rambler Bus service further (the Rambler Bus is a 'hop on-hop off' service which runs throughout the summer).
- The Plan should address the issue of footpaths in Altananam and Broombeg areas.
- There should be better walking facilities along the Glenariff Road in Waterfoot.
- Participants highlighted that 30% of people in the District do not have cars and the District is at a disadvantage in terms of access to services.
- Moyle District Council does not have the resources to implement or sustain a community transport network, but the Area Plan should encourage alternative forms of transport such as walking and cycling, particularly in settlements such as Moss-side and Armoy which would become more accessible if they were connected by cycleways.

- A cycle path could be developed along the River Bush in Armoy.
- Concern was expressed about increasing levels of traffic around and to the Giant's Causeway. Participants said that the roads are already under pressure but if the number of visitors increases further the roads will not be able to sustain the traffic.

- **Industry and Employment**

Participants referred to the lack of employment opportunities in the Moyle area locally and asked if some industrial land could be zoned in Armoy. It was noted that industrial space was also needed in Bushmills.

Concern was expressed about the extent to which industrial land within Ballycastle has been lost to recent developments.

- **Natural Environment**

Many of the comments relating to the natural environment centred on Ballycastle and included:

- The recent loss of trees from and around the town of Ballycastle, particularly on approach roads. The belief was that tree cover had reduced by about 50% as new developments have taken place. There was a call, therefore, to give greater protection to remaining trees.
- Ballycastle Forest should be improved and given greater protection by the Plan.
- People suggested that all new developments in Ballycastle should incorporate landscaping schemes including trees and that the walkway along the River Tow should be extended towards the viaduct and the town centre.
- Concerns were also voiced over erosion of the coastline at Ballycastle Golf Course which may have been caused by developments at the harbour.
- The forested area to the west of the sewage works in Bushmills should be protected.

- **Built Environment**

Many of the participants appreciated the importance of preserving the status of Conservation Areas and listed buildings. There were however some concerns over recent inappropriate developments in Conservation Areas and the potential loss of buildings of importance. Specific reference was made to conservation issues in Ballycastle, Bushmills and Cushendall. These were:

- The Diamond area, Main Street, the Market Yard and the old convent site (Ballycastle) should be protected from inappropriate developments. The Manor House was highlighted as a listed building which is currently vacant but worthy of being renovated.
- Bushmills would benefit from an environmental improvement scheme. The Courthouse and the houses on the bridge were suggested as being in need of repair.
- The Conservation Area designation in Cushendall is welcome but the only buildings in the village that are not of a high visual standard are the bank and the library. It was emphasised that local people want high standards to be set by business people and property owners in the Conservation Area.
- Planning permission was recently granted for apartment and housing developments which local people consider to be inappropriate and contrary to the Cushendall Conservation Area guidelines. At the same time, local people have difficulty obtaining planning permission for individual houses because of Conservation Area restrictions.
- The Rookery in Ballycastle should be better protected.
- The harbour area in Ballintoy should be protected from any further development.

- **Community Facilities**

The main concern regarding community facilities for the people in the Moyle area was that adequate provision should be made to meet the recreational needs of local communities. Comments included:

- The Area Plan should zone adequate land in Ballycastle to accommodate the provision of a community theatre and associated community space.
- The Plan should influence future developments within Ballycastle to ensure that some provision is made for play facilities for children.
- There is a need for a community facility in Cushendall.
- If Cushendall's development limit is extended to allow for more housing then a proportionate amount of land should also be zoned to cater for the needs of children and young people. It was noted that young people currently travel to Ballymena to access leisure facilities.
- The development limit of Ballintoy should be extended to the east to include the children's play facilities.

- A multi-purpose community centre is needed in Waterfoot - this could be located on an area of open space opposite the primary school.

- **Recreation and Open Space**

Participants in Ballycastle suggested a number of locations where land could be zoned in the Plan for recreational use by both residents and visitors. This included the land to the north of McAuley Park and the land to the south of Station Road outside the town centre boundary. Young people consulted mentioned the need to protect the playing fields on Quay Road in the town.

It was suggested that land outside the development limit in Cushendall and to the south of the town (between the Coast Road and Middlepark Road) should be retained as open space.

Waterfoot was said to be in need of additional recreational land so that a new football pitch could be developed.

It was also said that a picnic area and walkway to Red Bay Castle in Cushendall could be developed.

Land north of the Dunderave estate in Bushmills was highlighted as being worthy of retention as open space.

- **Infrastructure**

Many participants voiced their concerns over the poor state of the roads and sewage systems around the Giant's Causeway. There was particular opposition to any new developments near the Causeway before infrastructural improvements have taken place. A number of people were worried about the sewage and pollution along the Causeway coastline and stressed that the current situation is no longer acceptable.

- **The Planning System**

On a number of occasions participants asked questions which related to the planning system and processes rather than any specific issue in the Area Plan. These issues included:

- The Planning Service should create a balance between allowing new development in settlements and throughout rural areas of Moyle while avoiding the mistakes of over-development such as 'bungalow blight'.
- Developers are increasingly using the Article 32 non-determination appeal whereby planning applications are processed by the Planning Appeals Commission and not the Planning Service. There was concern for example that the Commission may not request environmental impact assessments for applications at the Giant's Causeway that the Planning Service would have requested if it had dealt with the applications. The fear is, therefore, that applications are being assessed without the benefit of all the necessary information.

- **Other Issues**

An opportunity site exists on land between the primary school and nursing home on Quay Road in Ballycastle.

Similarly there are sites in Bushmills which could be redeveloped, for example the old Courthouse and the factory site. In Cushendall the old hospital site (west of Legg House) and the old boat club provide opportunities for redevelopment.

The Giant's Causeway

The majority of participants expressed opinions on the future of the Giant's Causeway and how the land surrounding it should be developed. Many people were keen that the Area Plan, through its policies, should ensure that the Giant's Causeway maintains its World Heritage Site status and that the impact of existing inappropriate developments should be minimised. Comments included:

- There is a need for the introduction of a buffer zone around the Giant's Causeway which would offer the same strict protection afforded to other World Heritage Sites such as New Grange in the Republic of Ireland and that strengthening of policies such as PPS6 on Archaeology and the Built Heritage would assist with this.
- The protection given to the Giant's Causeway should relate to views and vistas rather than act as a blanket policy for the whole buffer zone.
- The degree of rigour employed by the Planning Service in its scrutiny of planning applications at the Giant's Causeway was queried.
- A unique set of policies for the Giant's Causeway is needed, including guidance on the type of development that would be acceptable and where it could be located.
- UNESCO (which is responsible for World Heritage Site designations) has asked the Department for Culture, Media and Sport in London to intervene in all planning decisions in the Giant's Causeway until the issue of the proposed visitors' centre is resolved. Participants said UNESCO has indicated that the World Heritage Site status may be in jeopardy as a result of the number of inappropriate developments taking place at the Causeway.
- It would be more appropriate for the Giant's Causeway and the Glens of Antrim AONB to have planning policies similar to those which apply in National Parks in Great Britain. These policies allow for planning control as well as focused development to ensure the sustainability of rural communities. They could permit some industrial use and employment opportunities while protecting the environment from second home developments.
- The emerging AONB Management Plan should have a statutory function rather than an informing role.
- Piecemeal planning applications granted permission before the adoption of both the Northern Area Plan and the AONB Management Plan could destroy the setting of the Giant's Causeway so there should be no delays in the preparation of either to circumvent this issue.

Rathlin Island

Rathlin Island is a unique location within the Moyle District. The participants at the public meeting asked the Area Plan Team to consider the island and its future development separately and argued that planning policies which apply to the bulk of the Plan area would not necessarily be appropriate in Rathlin. To reflect this, the findings of the Rathlin public meeting are documented in the separate sections which follow.

- **Second Homes**

Residents believed that the control of holiday homes and careful consideration of the number of housing developments approved as holiday homes or second homes would be beneficial to the island community. Mention was made of the belief that holiday home owners contribute little to the island economy.

- **Affordable Housing**

The need for affordable housing, for young people in particular, was said to be necessary to encourage previous residents to come back to the island and to attract new members of the population. The provision of more housing by the Northern Ireland Housing Executive (and/or Housing Associations) was believed by residents to be one method of securing affordable homes on the island. The affordability issue was said to have been influenced by recent private holiday home developments which are on the market at prices which will inevitably cause other house prices to rise. While acknowledging that the planning system has no control over the price of new housing and that this is an issue for the private market to determine, residents did say that the planning system could consider exercising more strict control on the number and extent of holiday home developments.

- **Housing Allocation and Growth**

Most recent housing developments have occurred at Church Bay (in the harbour area) and while some residents said that any future development should be located there because of adequate infrastructure - water and sewage systems - some did refer to the imbalanced community that is starting to develop with an under-developed western section and a well developed southern section.

- **Housing Design**

Residents referred to historic settlement patterns and house designs, mentioning that in the past island dwellers chose their sites carefully, ensuring that they blended into the landscape and were unobtrusive in design. A number of these older properties and wallsteads remain and residents would like to renovate them rather than have to build houses which are not in keeping with the island's vernacular style and tradition. This was suggested as a sustainable way forward for the island's growth and development from the point of view of contributing

to the island's heritage as well as helping to meet the need for new affordable housing for young people, people returning to live on the island and attracting new residents to the island.

Residents also expressed concerns over one recent housing development at Church Bay. This scheme, which has been built for the second home market, was originally described by the developer as "traditional fishermen's cottages". They have now been built and islanders said they would neither describe them as traditional nor fishermen's cottages. Overall residents are fearful that the island's unique qualities will be compromised by developments such as this.

- **Other Housing Issues**

Residents were particularly concerned about the regulations governing planning permission for replacement dwellings. Querying why a building has to be habitable before planning permission is granted they suggested that this policy should be relaxed to enable older properties to be re-used.

- **Tourism**

Tourism was identified as one of the key growth sectors on the island. Existing island attractions include the Royal Society for the Protection of Birds reserve at the western tip of the island, walking and cycling. While accepting that the island needs - and at certain times of the year depends on - tourism, residents want a careful balance struck by the Plan in terms of accommodating and encouraging tourists while ensuring island life and its environment are not compromised. One particularly negative feature of tourism highlighted at the meeting was that of the derelict caravan site at Church Bay. The caravans have not been used in many years and have become an eyesore for local people and visitors. This was identified by participants as an enforcement and/or illegal dumping issue. Participants asked if the planning system could assist with this issue immediately and if the Area Plan tackle the longer term issue through the introduction of a policy statement precluding the development of similar caravan sites.

- **Roads and Transport**

Many roads on the island are poor and local people said that this could inhibit the growth of tourism. In terms of transportation the ferry has a pivotal role to play, serving both residents and visitors. The ferry service was said to have its limitations, especially in poor weather and in terms of the number of people and cars it can accommodate (for example, for every vehicle transported 17 passengers are turned away). Although not directly an Area Plan issue, residents did believe planning has a role to play in terms of facilitating changes in the roads and transportation infrastructure on and to the island.

- **Industry and Employment**

Employment and the need for the Plan to identify land that could facilitate growth in this sector was identified as being an issue as important as the need for housing. Main sources of employment on the island include that provided by the ferry boat, which operates from the mainland to the island, and jobs in the farming sector. Appreciating that the Area Plan could not influence the former (which may be under threat of closure) residents did say that relaxed planning policies for the farming community and facilitation of agricultural diversification could assist with the employment deficit. In this way they believe the island could become more economically self-sufficient and sustainable as a community.

In addition, residents asked that the Plan accommodate and facilitate growth in the telecommunications, IT and craft sectors through the inclusion of facilitative policies.

- **Environment**

While residents accepted that the unique environment of the island needs to be protected they believe that current planning policies are so restrictive that their application is having a detrimental effect on the vibrancy, life and sustainability of the island community. They therefore called for a more realistic and balanced approach to the inter-related issues of protecting the environment and the life of its inhabitants.

- **Infrastructure**

Residents expressed their frustration at the inadequate mains water system on the western side of the island. Although this is due to be upgraded shortly they were angry that it has taken so long and that people on this part of the island and the tourist industry have suffered in the process.

- **Other Issues**

Other issues were raised at the meeting. These included:

- Islanders feel marginalised by the planning system and at a disadvantage when planning applications are advertised. Applications can only currently be viewed on the mainland and in future residents would like to see copies of planning applications for developments on Rathlin sent to the island and displayed publicly.
- Local people would like developers to consult directly with them when planning to build on the island, they asked if the Planning Service could assist with this and request that developers carry out such consultation.
- Incomplete developments should be resolved through the planning enforcement system.

- Waste management, whilst a responsibility of the council, is a problem on the island and local people would like to see abandoned cars, for example, removed from the island.
- The council should consider offering financial assistance to the ferry service in a bid to help secure its future.

Consultation with Equality Groupings and Young People

Equality Groupings

Introduction

Under the provisions of Section 75 of the Northern Ireland Act 1998 public authorities are required 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 public authorities are also 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 personally carrying out face-to-face interviews and postal surveys. Few of the equality groups were aware that the Northern 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. It also recognised 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 it is formulating policies 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 they would 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. This means the assessment is 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 Plans 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 Plans 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 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 Area Plans 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 Northern 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 Northern Area Plan addresses Travellers' needs through clear, unambiguous policies.

The Plan 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 Area Plans but is under-resourced.

Community Relations Council

The Community Relations Council believes that Area Plans have the potential to greatly contribute to community development in Northern Ireland. The Council suggested that the content of Area Plans should advance community relations as opposed to mitigating against community relations and in preparing new Area Plans, 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 by 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 Area Plans 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. Playboard voiced strong opinions on the need for a pre-consultation stage and that the entire engagement process needs to be a complete process - with a beginning, middle and end. In addition the importance of an evaluation was emphasised. Finally, Playboard welcomed the decision to commission an independent organisation such as CTA to facilitate the consultation for 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. Young people have apparently had to leave or been forced out of Cushendun and Cushendall because of the cost of buying a house there - house prices have been pushed up by the volume of second home owners purchasing houses in the villages. 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' further 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.

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 said that the Planning Service should adopt a 'support approach' - ie a hands-on and community-led approach to the preparation of Area Plans. 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 Northern 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.

The approach and attitude taken by young people contrasted markedly from that of people who participated at other stages in the process. They had a positive outlook and concentrated on the need for a more equitable distribution of resources, for increased protection of the environment, for the accommodation of alternative forms of transport and on the need for a significant increase in community, recreation and leisure facilities throughout the Plan area. They hoped to see more people-friendly towns in the future with green spaces, cycle paths and more amenities for an increasing population. Their general comments included:

- Housing allocations should be spread throughout the Plan area rather than confined to main towns and villages.
- A variety of house types including starter homes, housing for older people and housing for people with disabilities should be catered for.
- There is a need generally for more parkland, green spaces and wildlife corridors - the Area Plan should facilitate protection of these valuable spaces.
- Communities can become sustainable if the need to travel is reduced - this can be achieved through adequate zonings in each settlement for retail and industrial uses thereby providing local employment and services.
- More land should be set aside for the recreational and leisure facilities needed by young people.
- More opportunities for walkers and cyclists should be provided in the Plan area.
- Pedestrianisation of town centres would make them more people-friendly and could help to reduce pollution.

Written Submissions

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

- **Arthritis Care**

Arthritis Care asked that the Northern Area Plan give serious consideration to the provision of more secure sheltered housing for the increasing population of older people within the community. They also called for the provision of affordable housing and purpose-built housing for the less able and older people with disabilities.

- **Ballygelagh Village Owners' Association**

The Association suggested the land surrounding Ballygelagh Village should be retained as a green belt and Countryside Policy Area. In particular it mentioned that development should not be permitted on either side of the lane leading from the Ballygelagh Road to Ballygelagh village and how the need to retain the green wedge between Portrush and Portstewart is of fundamental importance.

- **Bannside Rambling Club**

Bannside Rambling Club stressed that the Area Plan should ensure that public rights of way are kept open. It was also suggested that improving public transport services would mean that access to the countryside would be made easier and would thus reduce dependency on the private car.

- **Castlerock Community Association**

The Association is concerned that the southern limits of Castlerock will shortly join with the western side of Articlave and stressed that development on remaining green land should be totally restricted.

It also argued that Castlerock has enough apartments and unoccupied bungalows and town houses. Instead, in its opinion, the village needs affordable homes for permanent occupation. The Association also urged that the land west of School Lane and Freehall Road, already designated within the AONB, should be permanently protected as green space. It suggested that only land between Belvedere, Sea Road and Freehall Road should be considered for future development.

In addition, the Association was aggrieved at the recent loss and closure of the swimming pool, library and café, commenting that community facilities must be improved in the village. The need to upgrade the playground was highlighted as a further example of this.

- **Causeway Coast Communities Consortium**

The Consortium highlighted a number of concerns that are common to all of its member groups. These included: a shortage of affordable housing for local people; concern at the replacement of hotels, guesthouses and large private houses by apartment blocks; need for a balance between second homes and housing for permanent residents; need to keep public views of the coastline free from further development; need to maintain current development limits as far as possible; and the need for existing amenity land to be preserved and, where possible, extended.

- **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.

- **Cushendall Development Group**

Cushendall Development Group raised a number of issues relating to Cushendall village including the problems associated with second home development, the need for small business opportunities, more car parking and enhanced public transport facilities. Regarding future development of the village, the Group said that it should be restricted along the Coast Road (the area beyond Meadows Guest House) and that it should not go beyond St Mary's Church along the Cushendall to Cushendun Road. The Layde and Cairns areas were highlighted as areas for limited development with a call for more development to be concentrated in the Mount Edwards and Kilnadore area. The Group asked that future developments within the Conservation Area be

carefully monitored and that grants be made available for uniform traditional shop frontages.

On a general note the Group called for more relaxed planning policies for housing applications on previously-used housing sites and for more sensitively designed rural housing including residency conditions. Mention was also made of the need for improved infrastructure, especially the water system, the need to protect mountain landscapes and the need to establish a 50 metre buffer zone wherein new development would not be permitted.

- **Feeny Community Association Limited**

A community survey carried out by Feeny Community Association identified the need for community facilities (to cater for both young and older people in the community), and the need to encourage and support development of local employment and business opportunities. It also identified potential for tourism in the area which would stimulate growth and benefit the local economy.

- **Gault Kay Partnership (on behalf of residents of Brookvale Terrace and West Bay Road, Portrush)**

Reference is made in this submission to the need to retain an area of land at West Bay Road which is zoned in the North East Area Plan 2002 as amenity land. It is argued that retaining this land as amenity land will enable water sports activities to be developed whilst preserving the natural habitat and wildlife it supports.

It was also argued that the protection of this land as open space provides an important buffer zone between the sea and areas of housing and thereby retains the historic development pattern in Portrush.

- **General Service Mission**

A representative from the General Service Mission submitted a letter which raised a number of traffic and transportation issues. The Mission suggested that a link transport corridor should be adopted to run from Derry/Londonderry to Ballycastle. In its opinion, this would enable more areas on the North Coast to be developed for tourism and could potentially provide transport links to Scotland and Europe. The Mission also stated that the Coleraine to Derry/Londonderry railway should be diverted to run close to or through Limavady and Ballykelly. Accepting that the population of Limavady is steadily growing, it said that improved public transport is an important component of future developments in the area.

The Mission referred to a number of locations which it believes are suitable for future development. These include: an extension and renovation of the Broharris Canal as a recreation and tourism project; development of land between Ballykelly and Bessbrook to the south of the A2 for industry; and development of land between Limavady and Rough Fort for housing, recreation

and cultural facilities with the adjacent Farloe Wood and the Sampson Memorial Tower providing a backdrop for this development.

The Mission suggested that Limavady would benefit from a western relief road with a new bridge over the River Roe saying that this could reduce town centre congestion and through-traffic problems without being detrimental to traders and their businesses.

- **Glenariff Development Group**

Glenariff Development Group highlighted the need to preserve the green spaces along the sand dunes at Waterfoot and Glenariff beach and the preservation of the open area on both sides of the A2 from Waterfoot to Glen Road.

- **Loughgiel Community Association**

A number of issues were identified from a community action plan submitted by the Association. These included: the need to zone land for a public park; a call for improvements to public transport services to enable people to access employment opportunities in other areas; and the need for the Planning Service to hold information sessions in Loughgiel to provide planning advice to the community.

- **National Trust**

In its submission the Trust asks that the Plan reflects the government's commitment to sustainability and that the Programme for Government's definition of sustainable development "social progress for everyone; effective protection of the environment and the prudent use of natural resources and high and stable levels of economic growth and employment" be included in the Plan's text.

The Trust referred to the requirement for the Plan to be compliant with other statutory policies and strategy documents, saying that the Plan should take account of PPS2, elements of PPS6, AONB design guides and individual Conservation Area documents.

The Trust strongly urged the creation and strict application of buffer zones to enhance the protection of special areas (including ASSIs) and the setting of listed buildings. It also called for policies to be more effective in focusing development within existing urban areas and fettering the development of isolated rural developments.

The Trust said that it should be incumbent on developers to show how their plans conform to design guides including the Antrim Coast and Glens AONB Design Guide. Within the AONB it also believes that there should be strict limits on the size of replacement dwellings and that sensitive re-use of buildings and brownfield sites should be encouraged.

The Trust said that the new Plan should promote access over mobility and thereby reduce the need to travel. Better use of existing roads and the promotion of green and sustainable transport measures should, in its opinion, also be encouraged where significant traffic is generated. The Trust suggested that alternatives to the car should be given greater priority in policy formation.

Referring to specific property issues in the Northern area, the Trust stated that the Plan should create a formal buffer zone to protect the rural setting of the Giant's Causeway and urged the Northern Area Plan to establish more stringent controls in Cushendall to reflect its status as a Conservation Area. The Trust also said that more strict application of AONB regulations along the North Derry/Londonderry coastline should be enforced and that the historical landscape of the Downhill Estate should be protected from peripheral developments.

- **North Antrim Community Transport**

North Antrim Community Transport emphasised the difficulties experienced by people not living on a main bus corridor when trying to access public transport services. Reference was also made to the fact that people who do live on the main bus corridor but who may have mobility problems may not be able to avail of Translink services.

The organisation acknowledges that the Plan needs to encourage the development of a strong and effective transport infrastructure. It also maintained that rural communities need a higher quality of life than they currently have and believes that transport has a vital role to play in achieving this.

- **Portballintrae Residents' Association**

The Association expressed concern that the previously unspoilt village of Portballintrae has experienced considerable change in recent years with a massive increase in the number of second homes and apartments and a decline in amenities such as village shops and hotels. The Association argued that as a result Portballintrae in winter has the air of a 'ghost town', older residents feel isolated and vulnerable, house prices have increased beyond the reach of first time buyers and this, along with the loss of sustainable employment, is driving young people out of the village.

The Association stated that there should be no alteration to the development limit in Portballintrae and proposed that land should be zoned for a community centre in a central location in the village. It also expressed the view that there is an urgent need for low density, low cost housing to encourage permanent residency in the village.

- **Portrush Community Development Group**

Portrush Community Development Group commented that the natural direction for long-term growth in Portrush is southwards towards Magherabuoy House Hotel and Hopefield Nursing Home and that no further land should be zoned for development until this area has been developed. It argued that second homes and apartment development in particular has reach saturation point. This type of development is uncharacteristic, is hampering the regeneration of the town and is inflating house prices. The Group suggested that any redevelopment scheme must make a positive contribution to the physical regeneration of the town.

All recreation and amenity land currently zoned in the North East Area Plan 2002 should, in its opinion, be retained for that purpose. In addition, the Group referred to areas of Portrush which must be protected from development which included: Mill Strand amenity area; Causeway Street overlooking the East Strand; coastal side of Landsdowne Crescent continuing along Bath Road, Blue Pool, Bath Terrace and outwards to East Strand; Arcadia amenity area; West Strand including Castle Erin Road; seaward side of Mark Street; Ramore Hill and recreation grounds; north and south piers of the harbour; and the seaward side of the Bushmills Road and Dunluce Road.

- **Portstewart Presbyterian Church - Clergy Fraternal**

Portstewart Clergy Fraternal asked that the Area Plan consider the introduction of a dual rating system whereby people who own more than one home have to pay considerably higher rates on their second home. The Fraternal also suggested that any revenue from the rates could be used to encourage young people to set up home in Portstewart (but emphasised that if they should leave within a specified period of time then any grant would have to be repaid). It believes that if young people are successfully attracted into Portstewart they would make a valuable contribution to the community.

- **Portstewart Resident - Individual Submission**

A resident from Portstewart maintained that the rise in the number of second homes in the area has led to widespread feelings of resignation and despair amongst the remaining resident community. Based on her own research, she stated that 35% of housing units are occupied on a seasonal basis and this does not contribute to the permanent community. She referred to a 1991 publication where Planning Service predicted there would be an increase of 800 second homes during the 1990s in Portrush, Portstewart, Castlerock and Portballintrae. The resident's own research concluded that there has been an increase of 761 such homes over that period in Portstewart alone. She also referred to the decline in school numbers and the effect the resulting reduction in school staff has on the service provided by the school. The importance of safeguarding communities and protecting them from the real danger of exploitation and destruction caused by inappropriate housing developments was strongly emphasised in this submission.

- **Rathlin Island Co-operative**

The Co-operative recognises the negative impact of the continuing depopulation of the island and is keen to reverse this trend by establishing local job opportunities especially for young people. In its submission, the Co-operative stated that the depopulation trend has resulted in an increasing number of derelict dwellings. As a result it said that the island needs affordable housing and not what it considers to be inappropriate holiday home developments. The Co-operative stressed the importance of acknowledging the unique island culture of Rathlin in the same way island cultures are acknowledged in the Republic of Ireland and Scottish planning systems.

- **Rural Housing Association**

The Rural Housing Association had been approached by the Glen Rural Community Group in Armoy with regard to providing rental accommodation in the Cromaghs area. Initial research by the Association identified a strong interest in rented accommodation from both local young people who wish to remain in the area and former residents who now live elsewhere.

Making reference to Policy Hous7 of the Planning Strategy for Rural Northern Ireland, the Association stated that the Cromaghs area satisfies five of the criteria specified in this Policy and should therefore be designated as a Dispersed Rural Community.

- **Strand Road Action Group (Portstewart)**

The Group highlighted the fact that in the last ten years nearly 350 apartments have been developed in Portstewart. While recognising the need for housing choice and market forces the Group commented that Portstewart needs sustainable housing for the community to survive. In its opinion house prices have risen as a result of the new apartment developments, school enrolments have declined, local shops have closed and the character of the community has changed. The Group called for: buildings of character to be protected; affordable housing; protection of undeveloped coastal areas; sensitive development; and the preservation of amenity areas.

- **Ulster Society for the Protection of the Countryside (Northern Group)**

The Ulster Society for the Protection of the Countryside (Northern Group) monitors development proposals in the northern part of the region and examines planning applications which are likely to be contentious. In doing so the Society says that it has found serious deficiencies in the current operation of planning controls.

Making reference to the RDS and its sections on seeking to provide housing choice to meet community needs, the Society referred to the issue of apartment development replacing traditional dwellings.

It perceived this trend to be contrary to the spirit of the RDS and said that new apartments are often priced beyond the means of local people.

Likewise it said the over-dominance of apartment developments is contrary to the RDS which seeks to create quality built environments which contribute to the achievement of safe, complete and balanced communities, as they are occupied on a seasonal basis and, in its opinion, lead to the disintegration of village life. There was also concern that apartments are not as suitable for families as traditional housing units.

The Society also noted the RDS reference to the need to extend travel choice for all sections of the community by enhancing public transport, and said that most holiday makers travel by car and therefore do not contribute to the enhancement of public transport. Instead, it believes that the excessive car traffic generated by tourists compromises the safety and pleasure associated with walking and cycling.

The Society said that the Sustrans' cycle routes scheme does not ensure that cyclists are adequately catered for. In addition, it expressed concerns about the lack of speed limits along country roads and said public footpaths are inadequate.

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 Area Plan 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. Over 470 people attended the public meetings and 41% completed an evaluation form.

The participant data showed:

- a reasonable gender balance of participants (59% male, 41% female) at the public meetings and drop in events;
- 48% of participants were from the Protestant community, 39% from the Catholic community (the remainder belonged to neither community or declined to respond);
- less than 3% of participants were under 25 (low turnout at the public events by young people had been anticipated, hence the inclusion of consultation with schools in the area);
- the remaining participants were evenly split between the 26-45, 45-60 and 60+ age groups;
- only 1% of participants described their ethnic background as other than white; and
- 4% of participants regarded themselves as having a disability.

Feedback on the promotion and implementation of the events included:

- equal numbers (19%) of participants found out about the events through letters from CTA or from receiving or seeing a flyer or poster; 36% from newspapers advertisements and 26% by word of mouth;
- 77% of participants found the events excellent or good, 20% rated them as average and 3% useless; and
- 88% of participants thought the events had given them an adequate opportunity to express their views (5% said they had not and 7% were unsure).

5. Concluding Comments

The public and community consultation on the first stage of the Northern Area Plan 2016 was a proactive and in-depth process. Hundreds of people throughout the four council areas participated, whether through the community outreach programme, the consultation with young people, the public meetings, the equality consultation or through sending written submissions. All of their views and comments are important and have been reflected in some way in this Report.

This Report will help inform the Planning Service of the many issues which prevail in the community and assist it in translating these where possible into policies and statements in the Draft Area Plan which is due towards the end of 2003. These policies can then begin to tackle the issues and problems so often identified by the communities in the Northern area.

Appendix

Consultation Events - Locations and Dates

Portrush	-	30 April 2002
Portstewart	-	30 April 2002
Coleraine	-	30 April 2002
Garvagh	-	1 May 2002
Magilligan	-	1 May 2002
Limavady	-	2 May 2002
Ballycastle	-	7 May 2002
Ballymoney	-	7 May 2002
Rasharkin	-	8 May 2002
Loughgiel	-	8 May 2002
Giant's Causeway	-	9 May 2002
Castlerock	-	13 May 2002
Dungiven	-	14 May 2002
Portballintrae	-	15 May 2002
Cushendall	-	16 May 2002
Rathlin Island	-	16 May 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.

Community Technical Aid
445-449 Ormeau Road
BELFAST

BT7 3GQ

Telephone - 028 9064 2227

Fax - 028 9064 2467

Email - info@communitytechnicalaid.org