PLANNING APPEALS COMMISSION

The Planning (Northern Ireland) Order 1991

Article 7

PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE BELFAST METROPOLITAN AREA PLAN 2015

REPORT ON CARRICKFERGUS BOROUGH COUNCIL AREA

by

Commissioners E Kinghan, A McCooey, A Speirs & M Jones

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<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>METROPOLITAN CARRICKFERGUS</td>
<td>1</td>
</tr>
<tr>
<td>CARRICKFERGUS</td>
<td>3</td>
</tr>
<tr>
<td>Objections to the Settlement Limit</td>
<td>3</td>
</tr>
<tr>
<td>Objections to Housing Zonings</td>
<td>6</td>
</tr>
<tr>
<td>Objections Seeking Additional Housing</td>
<td>9</td>
</tr>
<tr>
<td>Employment</td>
<td>9</td>
</tr>
<tr>
<td>Urban Environment</td>
<td>13</td>
</tr>
<tr>
<td>Natural Environment</td>
<td>13</td>
</tr>
<tr>
<td>Education Health and Community Facilities</td>
<td>15</td>
</tr>
<tr>
<td>CARRICKFERGUS TOWN CENTRE</td>
<td>16</td>
</tr>
<tr>
<td>GREENISLAND</td>
<td>20</td>
</tr>
<tr>
<td>Objections to the Settlement Limit</td>
<td>20</td>
</tr>
<tr>
<td>Objections to Housing Zonings</td>
<td>24</td>
</tr>
<tr>
<td>Transportation</td>
<td>27</td>
</tr>
<tr>
<td>Urban Environment</td>
<td>27</td>
</tr>
<tr>
<td>Open Space, Sport and Outdoor Recreation</td>
<td>29</td>
</tr>
<tr>
<td>Education and Community Facilities</td>
<td>30</td>
</tr>
<tr>
<td>WHITEHEAD</td>
<td>32</td>
</tr>
<tr>
<td>Objections to the Settlement Limit</td>
<td>32</td>
</tr>
<tr>
<td>Transportation</td>
<td>33</td>
</tr>
<tr>
<td>SMALL SETTLEMENTS</td>
<td>34</td>
</tr>
<tr>
<td>TROOPERSLANE</td>
<td>34</td>
</tr>
<tr>
<td>KNOCKNAGULLIAGH</td>
<td>34</td>
</tr>
</tbody>
</table>
APPRAISAL OF KEY SITE REQUIREMENTS

The purpose of this section is to set out our general approach to the matter of key site requirements attached to zonings. We consider that many of the key site requirements specified in the Plan are not in accordance with the guidance set out in paragraph 39 of PPS1. The guidance states that development plans should set out the main planning requirements. It is clear that this is intended to address such matters as constraints to be overcome and specific issues in relation to the site. They should not read like universal informatives or planning conditions to be attached to every site without any thought as to whether they are actually key to the development of the individual site or not. We shall also address the situation where the matters specified are addressed by regional policy and so the key site requirements are merely duplication.

Acceptable Uses

We consider that there may be cases where the range of acceptable uses should be specified in the form of key site requirements. This would normally relate to employment or mixed use sites. The list of acceptable uses on employment sites that do not have specified uses, however, should be set out in the strategic employment section of the Plan and cross-referenced in each District Volume.

Density

PPS12 requires minimum density levels to be set for housing sites within urban footprints and other sites as deemed appropriate. Maximum densities may also be specified where required. For this reason we consider that density does not need to be specified in every case. Where density has not been proposed as a key site requirement, it will be for the Department to consider if it is appropriate to include it in the adopted Plan. For the purposes of calculating the estimated yield from objection sites we have worked on the basis of a density of 25dph unless otherwise specified. It will be for the Department to consider individual proposals in accordance with regional policy where no density is specified.

Transport Assessment

Transport assessment is addressed by Policy AMP 6 of PPS3 and requires developers to submit a transport assessment, where appropriate. We therefore consider that there is no need to include this as a key site requirement. Furthermore, many key site requirements in the Plan specify the highway improvements considered necessary. We consider that this may pre-judge the outcome of the transport assessment process. We note that paragraph 4.7 of PPS3 allows for the possibility that necessary infrastructure improvements may not be identified until the planning application stage. The Plan should only specify matters that are known to be a constraint to development i.e. the development could not proceed without certain highway works being undertaken or additional public transport being provided, etc.

We note that key site requirements often indicate that the layout shall provide for cycle and pedestrian links. We consider that this is a requirement of regional policy and should be addressed in the concept plan for the site and the transport assessment.
Similarly the Plan often specifies that an Article 40 agreement may or will be required to ensure that necessary highway improvements and local facilities are provided. There may be other means of achieving such provision. The issue is covered in general terms in GP 5 of PPS13, which states that developers should bear the costs of transport infrastructure necessitated by their development. An Article 40 agreement can be required at application stage should it prove necessary and we do not consider that specific reference to Article 40 agreements is necessary as a key site requirement.

Landscaping

Many of the landscaping requirements read as planning conditions. They are certainly not unique or key to the individual site. We consider that the retention of existing vegetation, buffer planting to the settlement limit and maintenance of open watercourses are covered by regional policy in PPS7 and are matters that can be addressed in the concept plan and at the detailed application stage. Guidance is also found in Creating Places and DCAN 8. Landscaping should only be included as a key site requirement in appropriate circumstances where there is a particular issue unique to the site in question.

Flood Risk

PPS15 states that development plans will not bring forward sites or zone land that may be susceptible to flooding unless in the most exceptional circumstances (paragraph 6.4). The Plan attaches an almost standard requirement for a flood risk assessment for many zonings. We have several difficulties with this approach: most fundamentally that land at risk should not be zoned. In any case flood risk assessment is required by PPS15 where relevant. We consider that the Department should have assessed whether sites fall within a floodplain as part of the preparation of the Plan. We do not endorse this type of key site requirement and consider that this is a matter addressed by regional policy and guidance in PPS15.

Notwithstanding the Department’s stated approach to objection sites where flooding is an issue, the correct approach is set out in regional policy. A site may be ruled out if it lies totally within the floodplain. If the extent of the floodplain is not known a flood risk assessment is a requirement of regional policy. Drainage assessment is a requirement of Policy FLD 3 in PPS15 and key site requirements of this nature are a duplication of that policy and are unnecessary.

Concept Plans

Planning Policy Statement 7 requires the submission of Design Concept Statements so we shall not impose this key site requirement. We may specify matters to be included in the Concept Statement. There may be instances where we consider that in line with Planning Policy Statement 7 a Concept Master Plan should be required to guide development of the site. We will indicate what matters need to be included in the Master Plans in order to address the complex issues involved given the scale of the site.
Housing

Housing recommendations will identify those sites to be held in the Short Term Land Reserve. Other sites recommended for inclusion in the Plan, including those within development limits, will be required to meet the Housing Growth Indicator and should be incorporated into the adopted Plan to meet needs to 2015.

Social Housing

We have recommended that the Department reviews housing zonings and objection sites recommended for inclusion in order to assess their suitability for social housing. It will be for the Department to impose key site requirements related to social housing on appropriate sites in the adopted Plan.

NOTES

Each volume follows the sequence of the relevant volume of the Plan i.e. objections to the settlement limits, then housing zonings, employment, etc.

Following the Department’s publication of the final version of PPS21, all proposed Green Belt designations in the Plan were withdrawn. We have not therefore considered objections submitted in respect of Green Belt designations or policies.

We have only provided plans identifying sites where a change to the Plan is recommended and clarification is necessary as to the extent of the site.
List of Abbreviations

AOCMD    Area of Constraint on Minerals Development
AONB     Area of Outstanding Natural Beauty
AOHSV    Area of High Scenic Value
APR      Area of Parking Restraint
ATC      Area of Townscape Character
CBC      Carrickfergus Borough Council
DOS      Development Opportunity Site
EHSSB    Eastern Health and Social Services Board
GHEG     Greenisland Heritage Environmental Group
HGI      Housing Growth Indicator
LLPA     Local Landscape Policy Area
NIHE     Northern Ireland Housing Executive
PPS      Planning Policy Statement
PSRNI    A Planning Strategy for Rural Northern Ireland
RDS      Regional Development Strategy
RLW      Rural Landscape Wedge
RSPB     Royal Society for the Protection of Birds
SLNCI    Site of Local Nature Conservation Importance
STLR     Short Term Land Reserve
TA       Transport Assessment
TS       Technical Supplement
TPO      Tree Preservation Order
ULW      Urban Landscape Wedge
UAHS     Ulster Architectural Heritage Society
METROPOLITAN CARRICKFERGUS

MCS 02 Employment land adjoining the University of Ulster at Jordanstown, Shore Road
(Objection 773, 641 & 1873)

Objection 773 relates to the failure to include the totality of University of Ulster owned campus lands within the development limit and include it within zoning MCS 02. The objection also sought exclusion of the lands from LLPA GD 10 and RLW CE 04. Evidence to the Inquiry sought the re-zoning of MCS 02 from employment use to university-related development but as this is outside the scope of the original objection, we can not consider the issue further. The University advanced two reasons for inclusion of the lands: firstly, for decanting purposes associated with a possible redevelopment of the campus and secondly, to provide a Science Research Park and Conference Complex. Whilst a Science Research Park would fall within the scope of zoning MCS 02, a conference complex would not and we can not therefore give consideration to this aspect of the proposal.

Objections 641 and 1873 (Greenisland Heritage Environment Group) objected to the employment zoning MCS 02 and sought its re-designation as Green Belt and RLW. They objected to this particular location for a Science Park which would leave the wedge too constricted and would result in the coalescence of the settlements of Greenisland and Jordanstown. GHEG and UU J counter-objected to each others’ objections; the counter-objections cannot, however, extend the scope of the objections.

Some of the evidence advanced on behalf of the University for the additional lands (ie beyond zoning MCS 02) related to its expansion needs in relation to an anticipated growth in student numbers and the outdated building fabric on the current campus. The University has undertaken a master plan review which includes an option to rebuild the campus using the recently acquired lands. The information presented to the Inquiry envisaged the use of the objection lands for decanting purposes and at the time of the Inquiry, the outcome of the proposals was unknown. It was indicated, however, that the rebuild option is only possible if the objection lands are included for university related activity. These proposals are beyond the scope of the objection and we are unable to give further consideration to them. In view of the temporary nature of the decanting proposal, however, we consider that it would be unnecessary to include the lands within the development limit to accommodate a short term use for this purpose. This would be a matter for the Department to consider through a temporary planning permission which need not have long term implications for the integrity of the RLW.

Turning to the other aspect of the University’s case, the only elements of the masterplan provided to the Inquiry that fall within the scope of the objection are the Science Park pavilions (within the zoned land) and research facilities. We acknowledge the University’s aspirations to expand its research and technology activities adjacent to the current campus facilities but they must be weighed against the objections seeking retention of the RLW to protect the separate identities of the Metropolitan Area and Greenisland. Zoning MCS 02 protrudes into this RLW. A significant proportion of the north eastern boundary is undefined and lacks any other features to clearly separate it from the surrounding agricultural land. It also protrudes into the rural area in an illogical way and appears contrived. The resultant RLW appears disjointed both on the ground
and on plan form. We acknowledge that the objection lands within the proposed RLW and Zoning MCS 02 are not discernible from the Shore Road which provides the impression that there is no break in the built up area. The land can be viewed, however, from within Greenisland, from the railway line to the north and from within the existing Jordanstown Campus. It is also a significant feature when seen from Knockagh as we have observed in relation to other objections. We consider that zoning MCS 02 would encroach significantly into the open lands between Greenisland and Jordanstown. This would be critical from the viewpoints previously identified. In view of the restricted nature of the RLW at this location, the inclusion of the additional lands as proposed by the University would unacceptably erode the RLW and prejudice its strategic function. The Department was prepared to accept the inclusion of a triangular area to the northwest of MCS 02 on the basis that it would not jeopardise the function of the RLW. We disagree with their assessment whether or not zoning MCS 02 is retained. Although we find zoning MCS 02 and inclusion of additional lands to be unacceptable in visual terms, our assessment must be weighed against the needs of the University.

GHEG put forward an alternative location for the Science Park adjacent to the proposed Jordanstown Rail station to the north of the campus and the relocation of some of its existing playing fields from the north of the main building to the proposed location of the MCS 02 designation which could be designated as recreation/open space. We agree that this would be the optimum solution to retain the RLW whilst accommodating the Science Research Park within the University campus. However, we accept that this would involve significant costs as well as the loss of substantial investment already expended. We also acknowledge that this would disrupt the existing relationship between the sports pitches and the new Sports Institute building. Other pockets of unused land identified by the objectors are either not in the University’s ownership or are in use for car parking. We agree that they are not suitable to meet the expansion needs of the University. We consider, however, that unlike the University’s core functions which are essentially tied to the university campus, the Science Park and research and development proposals are not essential university facilities. Although considered desirable by the university, they are complementary facilities and it is not essential that they are provided adjacent to the campus. Notwithstanding our view that it is unrealistic to provide them within the existing campus without considerable disruption and cost, we take the view that there is scope to accommodate this type of facility within the Carrickfergus and Newtownabbey areas in relatively close proximity to the University. We are not persuaded that the needs advanced by the University in their objection outweigh the objective of providing separation between the settlements of Belfast and Greenisland. Accordingly, we agree with the objectors that zoning MCS 02 should be excluded from the SDL and included within CE 04 and that the additional lands proposed by the University for inclusion within the development limit should be rejected. In view of our conclusion, it is unnecessary to consider the amended KSRs submitted to the Inquiry in respect of zoning MCS 02.

The University also objected to inclusion of lands within the LLPA GD 10. It was not explained why the objections lands do not merit inclusion within the larger LLPA west of Greenisland. We consider these lands to form an integral part of the LLPA which has been designated due to the nature conservation interest of the Silverstream watercourse and its associated vegetation. We have been presented with no evidence to conclude that the designation should be deleted in this area.
Recommendation:
We recommend that zoning MCS 02 is deleted and designation CE 04 is confirmed and extended to include the objection lands.

**CARRICKFERGUS**

**OBJECTIONS TO THE SETTLEMENT LIMIT**

Our views on the housing land allocation for Carrickfergus are set out in Part 1 of our report. We concluded that there should be no further allocation made to metropolitan Carrickfergus to meet RDS directions. Consequently, no further lands are required within the settlement limit for housing unless objection sites provide for the rationalisation of the limit. Consideration of those objections which seek additional housing land is therefore limited to analysis of the suitability of the sites in physical terms.

**Lands at Upper Road**
(Objections 3262, 2833, 3831)

Objection sites 3262 and 2833 seek inclusion of the land for housing. They directly overlap and extend to 31.3 hectares. The site is bisected by the non strategic road proposal CS 13/01 Carrickfergus Spine Road. It consists of a number of agricultural fields and abuts the SDL along its eastern boundary. It is defined to the north by Upper Road, to the south by the railway line and the west by mature hedgerow and trees. It generally slopes from north to south. Its zoning for housing would result in an excessive allocation of housing land and an unacceptable extension of the settlement in a westerly direction. The status of the site in a previous development plan has no bearing on our conclusions, however, we note that it was also outside the SDL in the Carrickfergus Area Plan 2001. We consider it to be unacceptable.

Objection 3831 sought inclusion of the site within the settlement limit for housing. This 8.2 hectare site to the eastern side of Upper Road comprises of 4 agricultural fields and abuts existing residential areas along its northern boundary. Its roadside boundaries comprise of good hedges. It is generally flat and level with Upper Road and the eastern portion of the site is elevated above lands within the SDL. The Department considered the site suitable for development.

We consider that development on the objection lands would extend development to the south along Upper Road, notwithstanding the string of roadside properties on the western side of the road. The objection site clearly reads as part of the open countryside beyond the built development of the town. Although the potential limit would be defined by mature boundaries it would represent a significant protrusion of the urban form into the open countryside. Given the removal of roadside vegetation to provide access, development on the objection site would appear prominent from Upper Road, particularly on approach from the south. Development on the elevated eastern portion of the site would appear prominent from within the settlement limit. We disagree with the Department’s analysis that the site is acceptable for development and agree with the counter objectors that the objection lands should remain within the countryside. We recommend no change to the Plan.
Lands at Middle Road  
(Objection 142)

This objection sought the inclusion of approx 8.5 hectares within the development limit for housing. The site abuts the SDL along Prospect Road and is defined by Middle Road to the north, mature vegetation and trees to the west and south. South Woodburn SLNCI and Woodburn River LLPA lie to the south west of the objection site. It is mainly agricultural land and a portion of the site contains a builder’s yard and dwelling set back from the road. The Department considered the site suitable for development.

The northernmost stretch of Prospect Road provides a defensible settlement limit and development on the site would read as an illogical protrusion of the urban area into the open countryside to an irregular western boundary. The roadside boundaries of the site along Middle Road and Prospect Road are well vegetated and screen the dwelling and yard within. Development on the site would necessitate the removal of this mature vegetation which would detrimentally expose the site irrespective of proposals for low density housing to the southern part of the site. The objection site clearly reads as an integral part of the open countryside. We disagree with the Department’s position that the site is acceptable and constitutes rounding off and consider that the site should remain within the rural area. We recommend no change to the Plan.

Lands to the rear of Woodburn Concrete Products  
(Objection 2497)

This objection sought the inclusion of approx 0.4 hectares within the SDL for the current concrete products (hard landscaping) business to facilitate open air display areas, a small manufacturing area and customer parking therefore preventing roadside parking and vehicles reversing onto Upper Road. The objector also sought its exclusion from the AOHSV.

At the Inquiry the Department conceded that the site does not make a contribution to the AOHSV. The Carrickfergus Escarpment is an extensive designation stretching across both Carrickfergus and Newtownabbey Boroughs which the Plan states forms a magnificent backdrop to Greenisland. We consider that due to its landscape character, small size relative to the extensive AOHSV and peripheral location, the objection site can be excluded from the AOHSV.

The existing SDL is drawn tightly around existing property boundaries. From our site visit, we note that there is some overspill from the concrete products business onto the objection site. Although the objection site is well defined on the ground, inclusion within the development limit would include a greenfield site and extend the limit into the open countryside. It would be surrounded on 2 sides with rural land and would still leave a large indent in the SDL to the north west of the objection site.

Although there are some retail uses on the objection site, the surroundings are primarily residential and rural and this fairly significant extension to accommodate a concrete works business would not be compatible or desirable given these surrounding uses.

Roads Service evidence relied on the creation of a new access / intensification of the existing access onto the protected route and stated that it was therefore unacceptable. However PPS3 does not rule out intensification within development limits, if there is no
alternative access. Roads Service also stated that it is not possible within the site to provide access off Woodburn Road with visibility in accordance with the required standards. We observed that the access was also difficult to negotiate due to the proximity of the busy junctions. The objector stated that the access is unsatisfactory and that the inclusion of the objection site would facilitate the turning of lorries on the site instead of the present situation where they have to reverse unto the main road. On the basis of evidence provided we consider it is inevitable that the expansion of the existing business will result in increased traffic movements which would be required to use an already unsatisfactory access. Although we acknowledge there would be an element of gain with the potential for vehicles to turn within the site and provide additional customer parking, it does not outweigh our concerns in respect of the sub standard access arrangements. In view of the access difficulties and the unacceptability of the site we do not favour its inclusion within the SDL.

**Recommendation**

We recommend that the objection site is excluded from the AOHSV and the development limit remains unchanged.

**Lands at Woodburn Road**

(Objection 3840)

Objectors sought that the Plan facilitate development on the land for a retirement dwelling. The objection lands are isolated and detached from the SDL by some distance. It would be illogical to include it within the settlement limit as it is free standing and unrelated to the existing urban form. We recommend no change to the Plan.

**Lands at Beltoy Road**

**Objections 1405, 1356**

This objector sought inclusion of 2 objection sites to either side of the Beltoy Road within the settlement development limit. The smaller of the 2 sites to the eastern side of the Beltoy Road extends to approx 23.3 hectares and is generally flat and bounded by Larne Road to the south east, Beltoy Road to the west and Tongue Loanen to the east. There are multiple electricity pylons on the site and the site is dominated by the power station to the south. The Department considered this site suitable for development.

Objection site 1356 to the western side of Beltoy Road extends to approx 65 hectares. It abuts the eastern edge of the SDL, with the exception of a portion to the south west of the objection site. It is defined to the north by Marshallstown Road.

The eastern edge of the SDL is clearly defined. We consider that development on either objection site would extend development significantly along the Beltoy Road into the open countryside and would not result in a compact urban form. Development would appear prominent on these open and extensive sites and would create urban sprawl along both the Beltoy Road and Larne Road.

Its zoning for housing would result in an excessive allocation of housing land which is not required and an unacceptable extension of the settlement limit. Accordingly we recommend no change to the Plan.
Objection 1384

The objector sought the inclusion of an approx 0.86 hectare site within the settlement limit for housing and for an access from Beltoy Road to housing zoning CS 05/02. We note that both housing zonings CS 05/02 and CS 05/05 have been developed and are accessed from Larne Road and this aspect of the objection need not be considered.

The objection site is defined by housing zonings and residential curtilages to the south and east and by the Beltoy Road with good roadside boundaries to the west. The northern boundary is undefined on the ground and is parallel to an existing hedge line and 2 large NIE pylons. The Department considered the site suitable for development.

Although the northern boundary is not defined on the ground, the site lies into the settlement and, if developed, would result in a compact urban form and rationalise the development limit in this location. The land is not prominent and development would have no more significant visual impact than the zoned land to the south. However, we consider that the close proximity of the electricity pylons to the northern boundary of the site and the overhead power lines would be visually dominant and for this reason we consider residential use of the site to be unacceptable. Accordingly, we recommend no change to the Plan.

OBJECTIONS TO HOUSING ZONINGS

Zoning CS 03/06 - Ashbourne Manor, Belfast Road
(Objection 162)

The objector sought reconsideration of this housing zoning for ‘greenspace’ to counteract the decline in ‘greenspace’ in the area, as it is a highly visible site and a focal point on a main road which would provide a positive contribution to the local community.

We note that the Plan states that this zoning is a committed housing site and has planning approval for 39 dwellings. It would therefore be illogical to de-zone it. We recommend no change to the Plan.

Zoning CS 04/07 - Land to the north of Brackenridge
(Objection 3340)

The objection sought the deletion of KSRs 1 and 3 - 10 but provided no further information to justify their removal. We refer to our general comments in relation to KSRs. Accordingly we are satisfied that the deletion of KSRs which require the submission of the following is justified:
- Concept Master Plan - KSR 1,
- Transport Assessment - KSR 4,
- flood risk assessment - KSR 6,
- a design layout including the provision of cycle and pedestrian links - KSR 8; and
- retention of existing vegetation and the provision of landscape buffers - KSR 9 and 10.

We can give no further consideration to the remainder of the objection in the absence of reasons why the other KSRs should be deleted.
Recommendation

We recommend the deletion of the following KSRs: 1, 4, 6, 8, 9 and 10.

Zoning CS 05/09 - Land at Bashfordsland, Marshallstown Road
(Objection 3825/28)

NIHE objected to CS 05/09 but referred to lands at Dunluskin which is zoning CS 05/08. Potential access difficulties were referred to and the possibility of a secondary access being explored. We do not have any information as to why the suggested access for either zoning is unsuitable and we are unable to evaluate this objection any further. Accordingly, we recommend no change to the Plan.

Zoning CS 05/11 - Lands at Prince Andrew Way
(Objection 3825)

NIHE also stated that there may be potential access difficulties with CS 05/11 which were not expanded on. We note that the KSRs require completion of the Victoria Road scheme which will create a new access to the zoning. This will address the objectors concerns. We recommend no change to the Plan.

Zoning 05/12 - Lands adjacent to the Victoria, Broadlands and Red Fort development
(Objections 3685, 3164)

Objections relate to the KSRs for the entire zoning and to an objection site which is a rectangular plot occupying the eastern part of the zoning. Objections to the KSRs are to:

(i) the requirement for a Concept Master Plan (CMP) for the entire zoning and seeking the sub-division of the zoning into 2 zonings (objection site - 12 b and rest of zoning -12 a);
(ii) development of the objection site being dependant on the completion of the Victoria Link Road. The objector stated that the adjacent landowner of the remaining CS 05/12 lands is unwilling to commit to a CMP which will facilitate completion of the Victoria Link Road because he does not see why he should pay for it.

The BMTP identifies a number of significant non-strategic road schemes linked to potential development opportunities or to give relief to urban areas. Carrickfergus Spine Road including Victoria Road is one of these schemes. This non-strategic road proposal - CS 13/02 Victoria Road has not been objected to and therefore will be confirmed in the Plan. The Plan states that it, along with the Carrickfergus Spine Road and Sloefield Road, are required to support development proposals within Carrickfergus and developers will be responsible for funding these schemes. The Department confirmed that CS 13/02 Victoria Road will be delivered by developers and allow access to the extensive zonings CS 05/09, CS 05/11 and CS 05/12. This is considered to be necessary infrastructure to serve development critical to the planning of this part of Carrickfergus.

The Department conceded in the context of a planning appeal in 2006 a maximum of 90 dwellings on about 9 hectares of the objection site with access via Tudor Road. We
have no information about the current status of the permission although it would have lapsed if not implemented. Irrespective of its current status, we consider that, in the interests of comprehensive planning of the wider area, access to zoning CS 05/12 should be taken via Victoria Road. The alternative access proposed by constructing a missing link on Prince Andrew Way between Broadlands and Craigs Road for approximately 160 additional units is not a direct and logical route and would undermine the comprehensive development of this part of the town. We note that some development has been approved without the need for contributions to the road but these would appear to have been commitments at the time when the Plan was drawn up and we reject the suggestion that it is inequitable to insist on the remaining developers contributing to the road. We consider therefore that the KSR referring to the completion of the Victoria Road scheme to be secured with other landowners should be retained.

Development Plans seek to secure the proper planning of an area. PPS 7 Policy QD 2 requires the submission of a Concept Master Plan for sites of 15 hectares or more zoned for housing in development plans so as to avoid unsatisfactory piecemeal development. Irrespective of the approval on the site, which may prevent comprehensive development of the zoning in its entirety, in our view the balance of the zoning should be included within a CMP. Notwithstanding the difficulties that the objector is having with adjacent landowners, the objectives of PPS 7 are to achieve comprehensive development which necessitates co-operation between developers. We agree with the Department that this dispute between landowners should not prejudice this process. We consider the requirement for a CMP for the entire zoning is justified.

The objector stated that the requirement for 1.5 hectares to develop local retail outlets and community facilities should be on land which adjoins Victoria Road. The location of the local neighbourhood centre within the zoning cannot be determined in isolation from proposals for the rest of the zoning. Its location should properly come forward as part of the CMP as required. To specify its location in the Plan would prejudge this process.

We were not provided with any explanation as to why a contribution to the Carrickfergus Spine Road should not be necessary and we consider that this part of the KSR should remain unchanged.

The objectors indicated that they had a problem with the KSR for the provision of an extended bus service to access the site. Public transport is included in PPS 3 as an element of transport infrastructure which developers may be expected to provide. In the absence of reasons why the provision of a bus service to facilitate adequate and convenient access to public transport within the zoning is unjustified, we are not persuaded that the KSR should be deleted.

The Department agreed that the KSR referring to the Council asserted public rights of way through the site can be deleted. As these are addressed under separate legislation there is no requirement to seek their retention through the development plan process. We therefore concur with the Department’s position.

We agree with the objector that KSRs relating to full flora and fauna surveys, retention of existing vegetation and the requirement of landscape buffers can be addressed through the CMP and can therefore be deleted. In the absence of evidence of any flood
risk the requirement for a flood risk assessment of the watercourses will be addressed by regional policy and these KSRs can be deleted.

Requirements for cycle and pedestrian links to adjacent housing developments are covered in our general comments for KSRs and references to these can be deleted. The Community Greenways along the western boundary and through the centre of the zoning ensure connectivity and permeability and we are not persuaded that references to these should be deleted. It is self evident that power lines exist and these would have to be accommodated as part of the CMP process and therefore references to these can be deleted.

**Recommendation**

We recommend that the following are deleted;

- KSR 4 bullet 4 relating to retention of the Council asserted public rights of way through the site;
- KSR 6 relating to flora and fauna survey;
- KSR 7 relating to the retention of vegetation;
- KSR 8 relating to landscape buffers;
- KSR 9 and 10 relating to flood risk assessments and watercourses;
- KSR 11 relating to cycle and pedestrian links; and
- KSR 12 relating to overhead power lines.

**OBJECTIONS SEEKING ADDITIONAL HOUSING WITHIN THE SDL**

**Lands at Downshire Road**  
(Objection 2831)

Objectors sought lands at Downshire Road to be zoned for housing. Part of the objection site is already zoned for housing - CS 05/01. The remainder of the objection site is agricultural sheds used for car sales and garage and a single dwelling within a large curtilage. As this portion of the objection site is within the SDL and is unzoned there would be no impediment to proposals for housing coming forward through the development management process. There is no need therefore for it to be specifically zoned for housing. We recommend no change to the Plan.

**EXISTING EMPLOYMENT ZONINGS**

**Zoning CS 07 - Lands at Belfast Road**  
(Objections 640/2, 2820, 3274)

CBC objected to the acceptable uses and sought a mixed use permitting call centres/offices and roof rack retailing. In view of our conclusions in Part 1 of our report that Class B1: Business Use (b) and (c) uses will be acceptable on all existing employment zonings, the objectors’ concerns in relation to call centres are addressed. The inclusion of offices and retailing are contrary to the office and retailing strategies of the Plan and
could undermine the vitality and viability of Carrickfergus Town Centre. Individual proposals can be assessed on their own merits in the context of the employment zoning

Objection 3274 sought the exclusion of lands fronting the Belfast Road and its identification as a DOS for retailing. The Department conceded that the site which was granted approval for a mixed retail warehouse and trade centre development with associated access road and car parking should be removed from the zoning. We note that part of this site has been developed and includes a Lidl store with a new access and car parking and as it has been developed it would be inappropriate for a DOS designation. We have no reason to depart from the Department’s position and recommend accordingly.

We consider KSR 2 which seeks a CMP to be appropriate given the extent of the zoning. Although the Department conceded that KSR 3 should be amended to read ‘access to be agreed with Roads Service’ it is obvious that the access arrangements will have to be agreed with Roads Service and such a KSR is unnecessary. As we have concluded that the requirement for a Transport Assessment and flood risk assessment are addressed through regional policy, KSR 4 and 5 can be deleted. We agree with the removal of KSR 6 requiring variety in elevational treatments as this is part of the design process and will be assessed through the development management process. The objector sought the removal of a reference to a south west boundary of 5-10 m as part of the landscaping KSR 7. We consider that this should be retained to provide a buffer between the zoning and the adjacent extensive housing area to the west.

Recommendations

We recommend the following;

- Land fronting the Belfast Road which is subject to a planning approval should be deleted from the zoning, as indicated on the Department’s plan;
- KSR 3, 4, 5 and 6 should be deleted.

Zoning CS 08 Land at Larne Road, Kilroot
(Objections 640/5,210)

Objection 210 sought the removal of 9 hectares of land from the zoning and for it to be left unzoned as it was considered that the employment zoning is unduly restrictive and would preclude a potential range of uses not in conformity with such a proposed zoning eg. public house, restaurant, cemetery, crematorium, waste transfer station. The objectors also contend that there is a substantial over provision of land zoned for existing employment. We have addressed the quantum of employment land in Part 1 of this report. It has not been demonstrated that there is an over provision of employment land in Carrickfergus.

The objector stated that the objection lands are occupied by a licensed Country Club premises situated near the frontage of the site – the remainder of the site is open fields. The objector states that they do not have control over any adjacent lands and cannot provide a CMP. We note that this former club premises appears to be vacant. Whilst we accept that the objection lands are of a different character than lands to the west we consider that it would be illogical to exclude the objection site as it would leave a substantial gap in the zoning. We consider that employment is an appropriate use on
the objection site given its context immediately adjacent to Kilroot Business Park, irrespective of its existing use. The requirement of an overall CMP for the zoning is appropriate given its extensive size; the fact that the objector does not control all of the adjacent land is not a justification for not requiring same. We consider that leaving the objection site unzoned could result in proposals prejudicial to the remainder of the zoning.

CBC objected to a single access requirement given that there are 3 access points from the A2. No information was provided to justify deletion of this KSR and we consider that this KSR is reasonable to rationalise traffic access to this extensive zoning. Accordingly, we recommend no change to the Plan.

**Zoning CS 12 - Trooperslane**

**Objection 3359**

The objector sought the removal of the objection site from the existing employment zoning and its re-zoning for residential.

The objection site fronting the Belfast Road comprises of several redundant derelict buildings and hardstanding previously in industrial use. The objector stated that the complex had been vacant since February 2006 and represents a brownfield development opportunity.

Notwithstanding the objectors claims that there are vacancies and space to let in CS 12, Carrick Enterprise Centre and Kilroot Business Park and that these employment areas are under performing, we agree with the Department that this site should be retained in employment use. This is to ensure that a valuable land resource for industrial, storage and distribution uses is available to enable further development of the site’s potential and help strengthen the role of Carrickfergus as an important industrial and service centre in line with the RDS. We have concluded in Part 1 of this report that no further housing allocation should be made to metropolitan Carrickfergus to meet RDS directions. Accordingly, we recommend no change to the Plan in respect of this objection.

**Objection 4225/4**

Invest NI objected to the extent of the road protection corridor within CS 12 as indicated on Plan Amendment No. 1 as part of it has already been leased and developed. They indicated that most of the anticipated road line and land take is already identified in their lease documents and some protection for the road has been afforded however the areas indicated on the lease documents are not identical to those shown on Plan Amendment No. 1. The Department conceded that they were content to adjust the road protection line as indicated within the objection as it will not prejudice the alignment of the road. We concur with the Department’s position.

**Recommendation**

We recommend that the road protection line in Plan Amendment No. 1 is amended, as indicated.
Non Strategic Road Proposals

Proposal CS 13
(Objection 4266)

Objections were to the revised Proposal CS 13 as shown on Plan Amendment No. 1 of Carrickfergus Spine Road including Victoria Road and Sloefied Road and the extent of the land reservation. However, this objection was not expanded on and we are unable to consider this matter any further. Accordingly, we recommend no change to the Plan.

CS 14 Park and Ride Site - Trooperslane

Objection 640/4, 939/11 and 2084

Objectors stated that local people are unlikely to use the park and ride facility as they currently walk or cycle to the station. It was claimed that those approaching from Carrickfergus on the B90 and from the A2 would experience the current road congestion at the level crossing (which is closed for a total of 21 minutes between 8.10 and 9.05 am) and would not be encouraged to use the park and ride. Whilst we accept that there would be some congestion, the park and ride at this location would still present an attractive alternative to the major congestion going into Belfast. We have not been persuaded that the anticipated congestion at the proposed park and ride would be so unacceptable to justify the deletion of this designation.

The BMTP states that the provision of strategic rail-based park and ride facilities is to be pursued at all railway stations or halts within the BMA, in particular, facilities are envisaged to be developed or expanded at Carrickfergus station, Trooperslane halt, Greenisland halt and a relocated Jordanstown station on the Carrickfergus Corridor (para 5.84 ). With an emphasis on public transport, these park and ride proposals provide an alternative to the car and aim to relieve traffic pressure on routes into the city centre. We consider the proposed park and ride at Trooperslane to be in an appropriate location within an extensive employment zoning adjacent to the station. The park and ride would be convenient for traffic approaching from the A2 and the B90 with commuters travelling on into Belfast by rail. We disagree with CBC that the Trooperslane is the least favourable location of other stations such as Carrickfergus, Clipperstown and Greenisland as it is further from the population centres. We consider that it is the most convenient rail halt in this part of Carrickfergus as traffic using the park and ride does not have to go into the town centre. In addition, the proposed park and ride at Trooperslane offers the commuter choice.

The objectors suggested alternative options of additional facilities at Clipperstown, Carrickfergus Station and Greenisland Station. However, as stated these locations already form part of the BMTP proposals to be pursued as a rail based park and ride facilities. Formal park and ride facilities and some rail / bus interchange are already provided at the Carrickfergus station. We note that Rail 21 supported this proposal.

Matters raised by the objectors such as anti-social behaviour at night and car thieves are outside the remit of the Plan. We are not persuaded that the traffic noise generated by the proposal would be significantly greater than that experienced by residents at present. Accordingly, we recommend no change to the Plan as a result of this objection.
URBAN ENVIRONMENT

OBJECTION TO ALL AREAS OF TOWNSCAPE CHARACTER CS 15 & CS 16
(Objection 3792 )

This objection referred to all ATC designations in Carrickfergus. Whilst the objection stated that none of the proposed ATCs were justified in whole or in part, no specific arguments were presented that would enable our further consideration of the matter. Accordingly, we recommend no change to the Plan.

NATURAL ENVIRONMENT

OBJECTIONS TO SITES OF LOCAL NATURE CONSERVATION IMPORTANCE

Objections to BMA Coastal Area and SLNCI CS 17 /01 : Kilroot Stream
(Objections 894 and 896)

These objections from Cloghan Point Holdings Limited sought the exclusion of the Cloghan Point Oil Terminal from the BMA Coastal Area and the exclusion of Kilroot Power Station from the BMA Coastal Area and SLNCI CS 17/01. The objectors indicated that the Departments agreement to their changes to strategic policy would address their concerns. We have no explanation from the objectors what their actual site specific concerns are. Given that we have generally endorsed the Department’s suggested amendments to Policy COU 4 in Part 1 of our report, there is no substantive objection for us to consider.

CS 17/03 - South Woodburn
(Objection 2507)

The objector sought the inclusion of lands to the rear of 75 Woodburn Road within the South Woodburn SLNCI. The objector states there has been unauthorised landfill for some time and metal storage. The issue of unauthorised development is outside the scope of this plan.

The Department conceded that the SLNCI boundary should be amended to include the objection site on the basis that the area has the potential to regenerate. PPS 2 makes provision for the identification of sites of local conservation importance in development plans but future regeneration potential is not a justification for such designation. We have not been provided with any information about the conservation value of the site and the speculation of its future value is insufficient to justify designation. Accordingly, we recommend no change to the Plan.

CS 17/04 - Woodburn and LLPA CS 26 Woodburn River/The Mount

Objection 2820/5

Objection 2820/5 was to the inclusion of part of the objection site which is within the LLPA and the SLNCI as it was claimed that the majority of the lands have no
environmental quality with the exception of groups of trees around the Rath. An area of land to be retained as LLPA was indicated.

This part of the SLNCI and extensive LLPA is to the north of employment zoning CS 07 and adjacent to the railway line. The LLPA and the SLNCI partially overlap and include pockets of semi natural deciduous woodland. A Rath sits within western side of the designations. It is generally bounded by woodland and the Woodburn River flows along the north eastern boundary.

The objection site contains a variety of habitats including mixed broadleaf woodland dominated by scrub and grassland and represents a valuable open space, a buffer and wildlife corridor on the edge of an industrial site. We consider that the objection lands should remain within the SLNCI as they contribute to local nature conservation interests. The objection lands are also of visual amenity value and are of intrinsic environmental value. They contribute to the setting of the Rath and should remain within the LLPA. We conclude that there is no justification for the removal of these objection lands from either designation. Accordingly, we recommend no change to the Plan.

**Objection 3058**

This objection sought the exclusion of lands from the LLPA and the deletion of the reference to the SLNCI. The housing zonings sought by the objector go beyond the scope of the original objection. Proposals for the inclusion of lands within the LLPA and the SLNCI are also outside the scope of the original objection. We therefore make no comments on these matters.

The Department’s concession at the Inquiry appears to be based on proposals put forward for the management of the land – indicating zones of development opportunity and conservation zones - which relate to areas outside the scope of the original objection. Notwithstanding the Department’s view and the objector’s claims regarding the quality of land within the proposed SLNCI and LLPA, the areas identified as development opportunity zones are likely to have significant nature conservation value and interest, given their juxtaposition with the remainder of the designation. The objection lands are an integral part of the wider LLPA and SLNCI designations and it would not be logical to exclude them from these designations. In any case, a SLNCI or an LLPA designation does not necessarily preclude development. It would be a matter for the development management process to determine if some form of development could be permitted in the areas identified at the Inquiry. We therefore recommend no change to the Plan as a result of this objection.

**CS 22 - LLPA - Oakfield Glen**

(Objection 1525)

The objectors indicated lands within LLPA CS 22 on maps, but in text referred to CS 23 - Prince William. As it is clearly shown on the maps we will consider this as an objection to CS 22. The objectors sought the exclusion of lands at Prince Andrew Way from this LLPA, which they acknowledged forms part of the curtilage of a listed building.

One of the features listed that contribute to the environmental quality, integrity, and character of the LLPA is the listed building and its surroundings at Glynn Park. The
objection lands form the curtilage and setting to the front of the listed building and include a long sweeping laneway and extensive areas of mature vegetation.

We do not agree with the objector that the LLPA is too extensive. Neither do we agree that the historical importance of the objection site has diminished due to the recent subdivision of the curtilage land and the subsequent residential development to the east - within zoning CS 03/05. The setting and curtilage to the front of the listed building and extensive areas of mature vegetation stretching down to the road remain intact.

We consider that the objection lands are an integral part of this extensive designation and should remain within the LLPA as they contribute to the environmental value and character of the area. Although the objection lands would be considered under PPS 6, we do not agree with the objector that no further policies should apply. Accordingly, we recommend no change to the Plan.

EDUCATION, HEALTH AND COMMUNITY FACILITIES

CS 31 - Community Facility Edenvale Avenue, Eden
(Objection 3825/49)

NIHE stated that this zoning identified by the Council for a community centre appears excessive and would wish to see part zoned for housing. This site is now cleared and whilst it does appear large we have no information on the area required for the proposed community facilities and no further information from the NIHE on the extent of land they seek for housing. Therefore we are unable to consider the objection any further. Accordingly, we recommend no change to the Plan.

Objection to non-identification of a school site
(Objection 640/1)

CBC objected that although the NEELB has stated that a new primary school is required for the town a site has not been identified within the Plan. We note that the education authorities were consulted in respect of the identification of land needed for educational purposes. CBC has not put forward any sites for consideration and therefore we are unable to consider this objection any further. Accordingly, we recommend no change to the Plan.
CARRICKFERGUS TOWN CENTRE

**Designation CS 32 - Town Centre Boundary**
**Zoning CS 39 - DOS, Ellis Street/ Woodburn Road**
**Designation CS 42 Protected Town Centre Housing Areas**
**Proposal CS 43 - Carrickfergus Area of Parking Restraint**
**Policy CS 44 - Urban Design Criteria, Carrickfergus Town Centre**

(Objections 1397, 2760/37, 38, 39 & 41 and 3352)

At the time of the consultation on the draft Plan Tesco had plans for a store on a site within DOS Zoning CS 39. Tesco’s agents submitted several objections to the town centre boundary, DOS CS 39, Carrickfergus Area of Parking Restraint and an adjoining Protected Housing Area (CS 42/01). The store has now been built and is trading. It is therefore obvious that the potential problems highlighted in the objections did not prevent the development sought. It is against this background that we consider these related objections.

The original objection merely states an objection to the boundary and town centre policy. No site or lands are identified for inclusion or exclusion. The subsequent submissions refer to the inclusion of additional lands at Ellis Street in order to allow for an expansion of the Tesco store nearby. These lands contain a terrace of dwellings and a business. As these lands were not referred to in the original objection the site cannot be considered. There is no explanation of why the alleged required additional retail floorspace cannot be accommodated on lands within the existing Town Centre boundary. In any event, even if there were a case for additional lands the objection does not specify any lands for inclusion and so cannot be considered further.

Tesco also objected to the DOS on the basis that it is out of date. There is no reason to include the site of the Tesco store in the DOS as it has been developed. We agree and recommend that the DOS boundary is amended to exclude the store and car park. Reference was made to uses being specified for the remainder of the DOS. This issue is addressed in our recommendations under Policy UE 3 in Part 1 of our report. Objection 3352 referred to the Key Site Requirements for the Zoning. We disagree with the Department’s assessment that they should remain in order to guide the development of the remainder of the Zoning if they are no longer relevant. The second and third KSRs may no longer be necessary given that the Tesco store and access with traffic signals have been completed. We recommend that the Department reviews these requirements and deletes them if they are no longer necessary or appropriate.

The objection to all Protected Housing Areas in Carrickfergus was unclear. After objecting to the area of parking restraint because it would discourage large foodstores from locating in the town centre, it states that this objection also applies to Proposal (sic) CS 42. No specific housing area was identified. We are satisfied that Protected Town Centre Housing Areas can be designated as discussed in paragraph 3.5.1 of Part 1 of our report. We cannot therefore support a blanket objection such as this on the basis that such designations might discourage foodstores. The objection to the APR focused on relaxation of the standards for food stores in town centres. The standards are specified in Policy TRAN 4. These objections were addressed in Part 1 of our report. The objection did not argue that the site should be removed from the APR. As we have noted, this store and a Sainsbury’s store have been provided in the town...
centre in any event. We recommend no change to the Plan as a result of the objections to CS 42 and CS 43.

We have recommended that Policy UE 1 is amended to allow for a measure of flexibility in Part 1 of our report. We consider that this addresses the concerns about Policy CS 44 raised by the objectors. Again, we note that the foodstore has since been built.

Recommendations

We recommend that the boundary of DOS Zoning CS 39 is amended to exclude the Tesco store and car park. We also recommend that the Department reviews the second and third key site requirements of Zoning CS 39 and deletes them if they are no longer necessary or appropriate.

DEVELOPMENT OPPORTUNITY SITES

Zonings CS 33 to CS 38, Various Town Centre Sites
(Objection 1469)

Ulster Architectural Heritage Society (UAHS) raised concerns regarding these DOS because of their location within Carrickfergus Conservation Area and in an area of archaeological potential. They objected to the lack of reference made to the protection offered to the buildings 'cited within the site', which it may be desirable to restore.

Zonings CS 34 and 35 and the vast majority of CS 33 and 36 are outside the Conservation Area boundary as shown in the Plan. There is a statutory duty to ensure that development proposals preserve or enhance the character and appearance of the Conservation Area under the Planning (Northern Ireland) Order. The Plan does not need to repeat that statutory duty. The Plan states that DOS have been designated to promote development within vacant or run down sites. No buildings of particular merit were referred to us to consider. Zoning CS 38 contains no buildings, but includes a hammer head for the end of North Street. Zoning CS 37 contains three terrace buildings next to a shopping centre. Two of these buildings are vacant and boarded up. The small portion of Zoning CS 33 within the Conservation Area contains unsightly demountable structures. We see no issue within the Conservation Area of conflict between the preservation of buildings of merit and the DOS Zonings and any development within the DOS zonings must meet the relevant statutory duty and policy requirements.

Paragraph 2.7 of PPS6 requires development plans to indicate, for the information of prospective developers, areas within the historic cores of towns and villages where it is likely that archaeological remains will be encountered in the course of development. They are to be referred to as areas of archaeological potential. This is not an imposition of any restriction or control on development: their role is solely to provide information. It is not an Area of Significant Archaeological Interest with policies for the protection of its character and integrity. There are no policies associated with areas of archaeological potential. They are shown in the Technical Supplement to aid developers. We also cannot deduce the significance of the area of archaeological potential to the protection of buildings. We recommend no change to the Plan.
We note that Zoning CS 36 has been partly re-developed as a restaurant and video store with car parking. A new building is under construction on CS 35 next to the gasworks museum. CS 34 appears to be in beneficial use for a fitness studio (in a new building) and a marine supplies store. Whilst large portions of CS 33 are vacant, a new residential development has taken place within the zoning. The Department may wish to take these developments into account in the Plan.

Zonings CS 40 and CS 41, Carrickfergus Marina (also Designation CS 27)
(Objections 849 & 1469)

UAHS objected to any development on these sites because of the alleged impact on the setting of the Castle, which they stated had been severely compromised by the “shocking intrusion of the apartment and office block”. Policy BH 1 in PPS6, Policy T3 and CS 44 of the Plan were referred to in support of the objection. Objection 849 related to the access key site requirement for Zoning CS 41.

We note that Zoning CS 41 has been developed as a Hotel and Wine Bar/Restaurant. We therefore recommend that it is deleted from the Plan as a DOS is no longer appropriate. In the light of the new building on CS 41, the concerns regarding development on CS 40 are unfounded. The Hotel building screens Zoning CS 40 from the Castle to the east. A 4-storey apartment block is located immediately north of this small site. The site is vacant and fenced off with temporary site offices close to the road. We consider that it could be a suitable DOS subject to our general comments and recommendations in Part 1 of our report. The objection is not therefore sustained.

The objection to Designation CS 27 related to restrictions on development of Zoning CS 41, which no longer apply as the site has been developed. In any event the issue is related to Policy COU 5, which was considered in Part 1 of our report. We recommend no change to the Plan.

Policy CS 45 - Carrickfergus Conservation Area: Additional Design Criteria
(Objections 849, 1469, 1586 and 2760/40)

We would remind the Department of our recommendation that Policy UE 2 be deleted from the Plan in Part 1 of our report. We stated that as a result of this recommendation, no further consideration would be given to the additional design criteria set out in the District Proposals.

Objection 849 makes the point that the Conservation Area boundary shown in the Plan departs from the boundary adopted upon designation of the Conservation Area in June 1977, in that it includes part of Zoning CS 41. The Plan provides the Conservation Area boundary for information only, but it is incumbent on the Department to ensure that the correct boundary is shown on the Plan maps. We make no further comment on this issue.

Objection to the failure to address the severance of the Castle from the Town Centre
(Objection 640/6)

CBC welcomed the Plan references to the severance between the Town Centre, Carrickfergus Castle and the Maritime Area but object to the fact that there are no
proposals by DSD to address this in tandem with the development of BMAP. Any
development schemes by DSD do not form part of the Plan process and we are unable
to comment on this objection any further. Accordingly, we recommend no change to the
Plan.
GREENISLAND

OBLJECTIONS TO THE SETTLEMENT LIMIT

General objection to the Settlement Development Limit
(Objection 2020)

This objection stated that the SDL for Greenisland would limit the potential growth of the town. We have considered the strategic issue of housing land provision in Part 1 of our report. In the absence of specific lands being identified for inclusion we are unable to give further consideration to the settlement limit in the context of this particular objection. Other individual objection sites will be considered in the remainder of the report. We recommend no change to the Plan as a result of this objection.

Lands at Whinfield Lane
(Objection 2229)

The objector sought the inclusion of this 8.5 hectare site within the SDL for housing and the amendment of the RLW CE 05. The objection lands comprise of relatively flat agricultural fields defined by the railway line and the curtilage of a dwelling to the north and mature hedgerows and trees to the remaining boundaries. This extensive objection site is isolated and detached from the SDL. It would be illogical to include it within the settlement limit as it is free standing and unrelated to the existing urban form. No evidence has been advanced as to why the objection site does not merit inclusion within the RLW and how it should be amended. We consider it to form an integral part of the RLW and development on it would unacceptably erode the wedge. Accordingly, we recommend no change to the Plan.

Lands at Upper Road

Objections 1486 and 3743

These objection sites sought inclusion within the SDL. Objection site 1486 forms part of objection site 3743. They comprise agricultural fields which gradually slope from north to south. The sites are defined by Upper Road to the north and the railway line to the south. Objection site 3743 abuts the SDL along its western boundary. They lie within the CE 05 Rural Landscape Wedge.

The eastern edge of the SDL is clearly defined at present. We consider that development on these objection sites would extend development out to the east of the SDL onto open countryside. Development would appear prominent on these open and extensive sites and would create unacceptable urban sprawl along Upper Road. It would also create a visual encroachment into the RLW and would contribute to the coalescence of Carrickfergus and Greenisland. Its inclusion would constitute an illogical protrusion of the development limit, due to the gap site along the road frontage immediately to the eastern edge of the SDL, to which there was no objection.

This would be detrimental to the function of the RLW when viewed from Upper Road. We cannot endorse inclusion of the objection lands within the development limit and recommend no change to the Plan.
Objection 232

The objector sought inclusion of a 0.77 hectare site within the development limit for housing. It lies within the extensive AOHSV. This road frontage site comprises of flat agricultural land and abuts the development limit along its western and southern boundaries. It lies within a row of roadside properties to the northern side of Upper Road. The road frontage dwellings to the west of the objection site are within the SDL and the two road frontage dwellings to the east are outside. We consider that development on the objection site would constitute rounding off resulting in a compact urban form. Development on the objection site would extend the SDL in an easterly direction and would visually link with the two dwellings to the east. It would therefore be logical to include the two properties to the east within the SDL. This is a matter for the Department to consider.

The loss of this site to the AOHSV would have no significance. Accordingly, we consider that the objection site would be suitable for low density housing development in keeping with its existing context and we recommend accordingly.

Recommendation

We recommend inclusion of the objection site within the SDL for housing.

Objection 3350, 3364 & 3474

The objector sought the inclusion of 0.37 hectares of land for housing within the development limit and its exclusion from the RLW and the LLPA. The objection site refers to a portion of land, formerly 1 Upper Road. It is defined by Upper Road to the north, Farm Lodge Road to the east and fencing to the west (previously an access lane to the rear of the property). It abuts the district boundary and SDL which follows the line of a former stream, which has been culverted and is now not readily identified on the ground. The Department considered that the site should be removed from the RLW and would be suitable for development, given that the objection site has been cleared with an adjacent permission for 19 units (now constructed).

The objection site was previously the access and garden of a former dwelling and equestrian centre. The equestrian centre and dwelling to the eastern side of the stream have been demolished and have been recently redeveloped for housing. We consider that, given the previous use of the site as part of a larger curtilage and its limited size, development on the objection site would constitute logical rounding off of the SDL. With reference to the counter objector’s arguments that it could be ‘open space’ for the adjacent development, this could only be secured, if imposed as a requirement of this permission.

While visible from Upper Road, we consider that development on the site would have a localised visual impact. The function of the RLW is to distinguish and maintain the separate identities of Greenisland and Newtownabbey. We consider that the site is not critical to the function of the RLW because of its small size and peripheral location. Inclusion of the objection site would provide an opportunity to improve the boundary to the SDL.
Planning Appeals Commission

The Department conceded due to the stripping of the original site features during construction works the objection site should be excluded from LLPA GD 10. We have no reason to depart from the Department’s conclusions and recommend accordingly.

**Recommendation**

We recommend that the objection site is included within the development limit and zoned for housing and excluded from RLW CE 04 and LLPA GD 10 West of Greenisland.

**Lands at Shore Road**

(Objection 783 & 780)

Objectors sought the inclusion of lands within the SDL for housing and their exclusion from the RLW. The original objection site was reduced to an area of approximately 7.5 hectares. The objection site comprises land between the rear boundaries of existing residential properties along the northern side of Shore Road and the proposed off line dual carriage way, which is part of the improvements to the A2 Shore Road – Greenisland. The new road is from Station Road to Seapark with a bridge over a new road at Whinfield Lane.

This road is not a BMAP proposal. At the time of the Inquiry, the objectors confirmed that the DRD Minster had announced that a Public Inquiry into the Draft Direction Order, Environmental Statement and Notice of Intention to make a vesting Order was to be held in October 2007. It was subsequently confirmed that the proposed major works scheme at A2 Shore Road, Greenisland is to proceed. Its estimated completion date is 2012/13.

The new by-pass defines the north western boundary of the objection site. Topography is relatively flat with some undulations. Although not included within the objection site, the objector indicated that access is possible via 150 Shore Road, which has planning approval for residential development.

The objector claimed that the proposed road would have a significant effect on the existing landscape, and will be a dominant feature. It was stated that it effectively pushes the urban area out into the countryside creating a man made feature. It was claimed that the road defines the new strong urban edge of Greenisland without affecting the integrity of the RLW or undermining the visual break between Carrickfergus and Greenisland. The objector proposes 100 detached dwellings however we note that this figure falls substantially short of the potential capacity of the site.

Although we agree that it is difficult to appreciate the RLW from Shore Road, the RLW is visible from long range viewpoints such as the B90, the elevated rail line to the north and from many vantage points including Knockagh Monument and from within the development limit of both Carrickfergus and Greenisland.

We are in no doubt that the new road will have a visual impact on the RLW. Although the new road would be visible from the viewpoints identified including Knockagh Monument, we do not agree with the objector that it will have such significant effect that it would become a dominating feature on the landscape. The railway line which cuts...
through the RLW is not a dominant feature and does not prejudice the function of the wedge; although it is accepted that it would have a lesser impact than a dual carriageway. It is not unusual to have roads traversing the open countryside and we do not consider that its presence justifies the significant extension of the SDL to include a visually intrusive swathe of development. We consider that development on this extensive objection site infilling the gap between the road and the rear of existing properties would severely intrude into the RLW and prejudice its strategic functions. Although we agree that in some circumstances roads can provide good limits to development, we consider that the rear curtilages of properties on the Shore Road already provide a clear and strong development limit. In any case we have already concluded in Part 1 that there should be no further allocation of housing land to Greenisland. We recommend no change to the Plan.

Objection site 780 is approx 0.61 hectares and lies within the larger 783 objection site. It abuts the SDL to its south east and south west boundary. It lies within the RLW and objectors sought its inclusion within the SDL and exclusion from the RLW. At this location, both sides of Shore Road are characterised by road frontage development and the SDL defines these ribbons of development. Although development on the objection site would not be visually prominent, it would create backland development which would not produce a better SDL than currently proposed. It would be uncharacteristic of the existing built form along the north western side of Shore Road. Even though the objection site is small relative to the size of the RLW, it is still an integral part of the designation and important to the setting of this part of Greenisland. Accordingly, we recommend no change to the Plan.

Lands at Trooperslane and Old Shore Road
(Objection 904 & 2666)

Objection 2666 includes the PSNI complex at Seapark on the Belfast Road and lands to the west to the rear of Whitelodge Court. It forms part of the larger objection site 904, which also includes lands to the east of the PSNI complex to either side of Old Shore Road and an extensive swathe of lands to the southern side of the Belfast Road.

Objection 2666 relating to the PSNI complex stated that the RLW designation ignores the developed status of the site and also lands to the rear of White Lodge Court to the west of the complex on the Shore Road which has planning permission for a 3 storey logistics headquarters. Whilst we acknowledge the existing PSNI complex is a fairly substantial building complex it is essentially free standing within the RLW. The presence of large buildings in itself is not justification for exclusion from the RLW and it is not unknown to have buildings within a RLW. We consider that the removal of the objection lands from the RLW would create an illogical gap within this extensive designation. The portion of land to the west which has planning permission does not alter our view.

Objection 904 by Phoenix Natural Gas Ltd sought the inclusion of lands within the SDL by linking the settlement limits of Greenisland and Carrickfergus, consistent with the treatment of separation of Greenisland and Newtownabbey rural areas. Exclusion of the objection lands from the RLW was also sought.

Objection site 904 comprises of land between Carrickfergus and Greenisland and abuts the SDL of both. It extends out on the northern and southern sides of the A2 dual carriageway and the Old Shore Road. It includes a mix of uses including a PSNI
complex, sewage works and some residential properties. The Phoenix Gas lands include a gas pressure reduction station and an area of previously developed land which has been cleared. This portion of land sits between the A2 and the Old Shore Road and the objectors claim that it could be retained as whiteland and suitable for residential or light industrial.

The objector argued that the RDS defines the urban footprint as the ‘continuous built-up area of the settlement… represented as an uninterrupted line.’ Therefore, the failure to include the objection site within the SDL, is inconsistent with the RDS and the BMAP definition of Contiguous Development Zone around the Metropolitan Area. It is also inconsistent with the treatment of other areas eg where the developed land along the A2 between Newtownabbey and Greenisland has been shown within the limit.

Although the objection sites are not rural we disagree with the objector that there is a continuous line of development as there are large parts undeveloped and heavily vegetated and travelling the Old Shore Road there is a definite rural ambiance.

Travelling the Belfast Road, notwithstanding the presence of the PSNI complex to the rear of a continuous security wall along the road edge, there is a distinct impression of separation and openness between Greenisland and Carrickfergus further reinforced by long range views across the Lough to the south. Inclusion of the objection lands within the SDL, and the development of the undeveloped pockets would effectively extend development in a linear direction along the A2, creating the coalescence of Carrickfergus and Greenisland and the significant erosion of the RLW. It would also be detrimental to the setting of the settlements and would hence prejudice the strategic functions of the RLW. We agree that development between Newtownabbey and Greenisland appears continuous along the A2, but this does not justify the inclusion of extensive swathes of land within the SDL. Accordingly, we recommend no change to the Plan.

**OBJECTIONS TO HOUSING ZONINGS**

**Zonings GD 04/01, GD 05/02, GD05/03, GD 05/05, GD 05/08, GD 05/10, GD 05/11.**
(Objection 939)

The objection argued that no housing developments should be allowed until the A2 road improvements have taken place. Any significant applications for housing sites would require a transport assessment which will allow the Department to assess the potential traffic impacts of the scheme on the wider road network. There is no evidence to suggest that necessary improvements could not be made. We consider that there is no need for the Plan to require such improved infrastructure and recommend no change to the Plan.

**Zonings GD 04/01, GD 05/05, GD 05/07, GD 05/08, GD 05/10**
(Objections 1873 & 1900)

The objectors sought the re-designation of the housing zonings as open space for recreation as it is alleged there is a deficit. The objectors argue that all the general amenity open spaces are all south of the railway line which divides the town and all are within NIHE lands. No such space is found in private housing developments north of the
railway line. There are 5 greenfield sites still undeveloped within upper Greenisland, which would make up the deficit if re-zoned.

We note that the Plan states that Zoning GD 04/01 was subject to a current planning application sufficiently advanced to be considered as a commitment. It would therefore be illogical to de-zone it. We recommend no change to the Plan in respect of this zoning.

We note that there is an extensive Area of Open Space identified to the north west of Greenisland on Upper Road which is readily accessible. The statutory provider of open space is the Council. We note that the Council were consulted during the Plan process and have identified no deficit. Open space to serve individual housing developments will come forward through the development management process. In the absence of any specific arguments for these housing zonings we are unable to comment any further and recommend no change to the Plan.

**Zoning GD 04/01 - Land opposite 1-10 Goldenview Park**
*(Objection 3532, 1873)*

In relation to the KSRs we note that part of the site is subject to a current planning application sufficiently advanced to be considered as a commitment. For the remainder of the zoning, however, we refer to our general comments in relation to KSRs. Accordingly, in the context of this site we consider that the following KSRs can be deleted: KSR 3, 4 and 5.

GHEG objected to the proposed density level. We note that this urban footprint site is not within the proposed ATC and we consider the density level proposed between 20 and 25 dwellings per hectare to be appropriate given its urban context. In terms of the character of the area, any proposals would be subject to PPS 7.

Our conclusions on the designation of DOSs are set out in Part 1 of our report. We note that the objector has not suggested a proposed land use for the suggested DOS. In the case of this site we do not consider that the site is strategically located or that its designation as a DOS would meet any of the other important Plan objectives. The site is within the SDL and can be developed as residential, subject to satisfying prevailing regional policy. The objector provided no specific arguments in support of the case that would enable our further consideration of this matter.

**Recommendation**

We recommend deletion of the following KSRs: 3, 4 and 5.

**Zoning GD 05/07 - Lands to the rear of Loughview Terrace**
*(Objection 939/5, 3534)*

Objectors stated that this should not be zoned for housing due to inadequate water service infrastructure and road congestion in the side streets. No evidence was presented to justify these claims and we are unable to consider this objection any further. Objection 3534 was to the KSRs. We refer to our general comments in relation to KSRs. Accordingly, we recommend the deletion of KSRs which require the submission of the following: transport assessment - (part of KSR 2), retention of
vegetation - KSR 3, flood risk assessment - KSR 4. It is self evident that overhead powerlines exist and these would have to be accommodated as part of the CMP process and reference to these in KSR 6 can be deleted.

**Recommendation**

We recommend deletion of the following KSRs: part of 2 (relating to the requirement of a TA), 3, 4 and 6.

**Zonings GD 05/08 - Land west of Berkeley Deane, Upper Road**

(Objection 1873)

GHEG stated that the density proposed for GD 05/08 within the ATC would be at variance from the existing densities; especially the context opposite within the LLPA which is described as, 'large houses situated in extensive plots with a significant amount of vegetation.' We agree that the density proposed for this zoning for a minimum of 25 dwellings per hectare is excessive given its location within a proposed ATC and its low density immediate context. Given the contrasting low density proposed for GD 05/10 of between 10 and 16 dwellings per hectare for a site outside the ATC, and that no density was proposed by the objector for GD 05/08, we remit this to the Department for further consideration of a lower more appropriate density level.

**Recommendation**

The density proposed for housing zoning GD 05/08 is remitted to the Department for further consideration.

**Zoning GD 05/11 - Lands between Neills Lane and Shorelands**

(Objections 912, 1873 & 3357)

GHEG claimed that traffic emerging from the zoning would create difficulties for traffic on the road. We note that any proposals are subject to a Transport Assessment and we have not been persuaded that any difficulties could not be overcome. GHEG also claimed that the zoning should be deleted as there has been several occasions of flooding and sewage overflow on the Shore Road. We note that the statutory bodies were consulted during the Plan process and no objections were raised and we are not persuaded by this argument.

We note that a portion of the housing zoning benefits from planning permission subject to conditions and the Department considers that this allows for a satisfactory form of development. We note that development has commenced within the zoning. For the remainder of the site, we refer to our general comments in relation to KSRs. Accordingly, we recommend the deletion of KSRs which require the submission of the following: transport assessment - KSR 4, retention of existing vegetation and the provision of landscape buffers - KSR 7 & 8 flood risk assessment - KSR 9.

It is self evident that overhead power lines exist and these would have to be accommodated as part of the CMP process and therefore reference to these in KSR 12 can be deleted.
**Recommendation**

We recommend deletion of the following KSRs: 4, 7, 8, 9 and 12.

**TRANSPORTATION**

**Objection to the lack of Park and Ride facilities at Greenisland Station**  
(Objection 1873/14)

GHEG objected to the lack of provision in the Plan for proper park and ride facilities at Greenisland Station. The BMTP states that the provision of strategic rail-based park and ride facilities is to be pursued at all railway stations or halts within the BMA, in particular, facilities are envisaged to be developed or expanded at Carrickfergus station, Trooperslane halt, Greenisland halt and a relocated Jordanstown station on the Carrickfergus Corridor (para 5.84). We note that Greenisland Station has a well used park and ride facility at present. However the objector did not expand on this objection or forward any specific areas for expansion of the park and ride facility, and therefore we are unable to make any further comment.

**Strategic Road Proposal - GD 06 - A2 to Carrickfergus**

We note that the Department confirmed on 12th October 2009 that proposal GD 06 Strategic Road Scheme - A2 to Carrickfergus, is no longer a proposal of the Plan and any objections in respect of it are no longer before the Commission.

**URBAN ENVIRONMENT**

**Objections to all Areas of Townscape Character: GD 07 & GD 08.**  
(Objection 3535, 3792)

Objection 3792 referred to all ATC designations in Greenisland. It stated that none of the proposed ATCs were justified in whole or in part. Objection 3535 referred only to GD 07. No specific arguments were presented for either objection that would enable our further consideration of the matter. Accordingly, we recommend no change to the Plan.

**Objections to Greenisland ATC Designation GD 07**

**Objection 152**

This objection sought the exclusion of 135 Station Road from the ATC. This is a dwelling which has been converted to a small local shop at a prominent location on a sweeping bend on Station Road close to the railway bridge. Whilst the roller shutters and signage are unattractive and discordant elements within the ATC, the building form and presentation reflects the age, scale and character of other buildings within the ATC which form the basis for the designation and we consider its inclusion is appropriate. The objector did not explain why the site should be excluded from the ATC and the extent of the site was not clearly identified. In addition, the objection site lies in a central...
position within the ATC, and its exclusion from the designation would be illogical. We recommend no change to the Plan.

**Objection 1873/1**

GHEG sought the extension of the ATC in 3 locations:

Along Upper Road in an easterly direction to Downview Road, at least on the southern side of the road. It was argued that with one early post war exception, the houses on the south side form a continuation and enhancement of the line of pre-war houses of the ATC. Within the objection site, the dwellings on the northern side of Upper Road are brickwork detached dwellings with uniform elevations and building line, set within spacious mature plots. Those to the south (with the exception of one single storey dwelling) are large detached dwellings of the Arts and Crafts style, with a uniform building line set within spacious and mature plots which are representative of one of the key features of the ATC. A brickwork dwelling sits at the corner of Upper Road and Downview Road. Although the dwellings to the northern side of the road are of a different character to those on the southern side of the road we consider that they reflect the ages and character of other dwellings along Upper Road within the ATC. Although not defined on a map, we consider that the dwellings and their curtilages on both sides of Upper Road as far as the entrance to Downview Road would make a positive contribution to the ATC and should be included.

School Lane: The objector sought the inclusion of a ‘characterful’ group of houses at the eastern end of the Lane. Approximately half of School Lane is included within the ATC and includes Edwardian semi-detached and detached dwellings set within mature gardens. One of the key features of the ATC is ‘the variety of designs ranging from early nineteenth century farmhouses to Victorian and Edwardian terraces and detached villas, and from interwar semi-detached houses and bungalows through to mid twentieth century church building and school’. This is a group of 3 small scale cottages with a plain rendered finish, small windows and simple roofscape with dormer windows. Although difficult to date, the cottages are unimposing and rather quirky in style, in a mature attractive setting at the end of a narrow laneway. They exemplify the variety of designs which is one of the key features of the ATC. We consider that the cottages and their curtilages would make a positive and valuable contribution to the ATC and the boundary should be extended to include them.

Mullaghmore Park: The objector sought the inclusion of Mullaghmore Park as it has an intimate ambiance that is worthy of protection. Mullaghmore Park is a cul-de-sac development off Station Road. It is characterised by semi-detached and detached dwellings of unremarkable design set close to the road with large rear gardens. We agree with the objector that there is intimate ambiance due to the scale of dwellings within their context and their relationship with the public realm. Whilst the Park exhibits a pleasant residential environment, it does not exhibit any of the features which would justify its inclusion within the ATC. Accordingly, we recommend no change to the Plan in respect of this part of the objection.
Recommendation

We recommend;
• the extension of the eastern edge of the ATC along Upper Road as far as the entrance to Downview Road;
• the extension of the eastern edge of the ATC at School Lane to include the group of cottages and their curtilages.

OPEN SPACE, SPORT AND OUTDOOR RECREATION

Community Greenways

Objection seeking designation of Community Greenways
(Objection 1873)

The objection from GHEG sought the designation of 2 new Community Greenways. One would run from Shore Road, along Whinfield Lane to GD 05/10, via Downview to GD 05/05 and GD 04/01, across the B90 to the right of way adjacent to the Presbyterian Church and hence to Knockagh Monument and onto the Ulster Way. The other would run from Shore Road at UUJ via the Wedge to GD 02/05, through the playing fields at the sports club to GD 05/08, then across the B90 to join the right of way to Knockagh Monument and on to the Ulster Way.

The vast majority of the proposed new greenways would follow existing laneways, footpaths and roads. Both proposals involve crossing the B90 Upper Road and the railway track.

The Plan states that the purpose of Community Greenways is to ‘seek to re-establish corridor links between the countryside and urban areas of open space such as parks, playing fields, and natural areas to create a network of urban open spaces’ Within the SDL the majority of the proposed Greenways in the objection link residential housing zonings via existing footpaths and roads. We see no merit to be gained in providing a formal connection between these areas which in some cases already exists. It is not the function of a Greenway to link residential developments with the countryside. Outside the SDL the proposals are across existing laneways. We consider that the routes proposed do not serve the specific functions of a Community Greenway and accordingly, recommend no change to the Plan.

GHEG also referred to a Public Right of Way across the Golf Course up to the Knockagh Monument. This Public Right of Way is not within the remit of this Plan.

Suggested new footpaths in Carrickfergus and Greenisland
(Objection 939/12)

The objector sought new footpaths between Newtownabbey and Carrickfergus via Knockagh Escarpment, between Carrickfergus and Woodburn Forests and between Carrickfergus and Whitehead. They also sought that BMAP should recommend that all rights of way should be signposted and maintained. The provision of rights of ways,
footpaths and cycle paths is not a matter for the Plan with the exception of Community Greenways. Therefore, we can give no further consideration to this issue.

**Objection to the lack of provision for connections to the National Cycling/Walking Network**  
(Objection 1873)

GHEG stated that at the Inquiry for the CAP, they attempted to get the disused railway line (‘the Back Line’) designated as a walking/cycling path with the potential to link Upper Greenisland with Monkstown/Jordanstown and the provision of a footbridge over the working railway line to Lower Greenisland and the UUJ campus to link to the National Cycling network starting at Loughshore Park and running through Belfast to Lisburn. This was rejected as the track bed was private Translink property and they may wish to reuse it. The objectors sought that this is re addressed. The provision of footpaths and cycle paths is not a matter for the Plan with the exception of Community Greenways. Therefore we can give no further consideration to this issue.

**EDUCATION AND COMMUNITY FACILITIES**

**Objection to non-identification of a school site**  
(Objection 1873)

GHEG objected to the omission of any proposals for additional Primary School provision in the Plan or the likely need for extensions to existing primary school. We note that the education authorities were consulted in respect of the identification of land needed for educational purposes. The objector has not put forward any sites for consideration and therefore we are unable to consider this objection any further. Accordingly, we recommend no change to the Plan.

**OTHER MATTERS**

**Objection that the Knockagh Escarpment should be given higher protection status than AOHSV**  
(Objection 1873)

GHEG stated that the Knockagh Escarpment - COU 6/02 should be given a higher degree of protection than AOHSV either as an LLPA, AONB or Country Park Status. AONBs and Country Parks are not designated through the Plan process, but through other legislation and we are unable to consider this element of the objection any further. GHEG stated that this objection was argued at the Draft Carrickfergus Plan 2001 where the Commissioner recommended that the Knockagh Escarpment should be delineated as an LLPA and the Commission concurred. We note that in the Department’s Adoption Statement, they did not support the Commission’s recommendation and concluded that designation as an AOHSV would be more appropriate to protect the quality and character of this scenic area. We concur with this view. We agree with the Department that the Knockagh Escarpment should not be designated as an LLPA and agree with their considerations as set out in the Adoption Statement which was based on the following;
the rural location and large size of the area;
LLPAs are generally considered to be more appropriate for smaller scale
designations within or adjoining settlements;
an Area of High Scenic Value in this instance will afford a similar level of protection
to the landscape as an LLPA.

Accordingly, we recommend no change to the Plan as a result of this objection.

Objections to lack of recognition of roads and sewage infrastructure overload
(Objection 1873)

GHEG stated that the Plan ignores the excessive traffic on the B90 Upper Road and the
A2 Shore Road for long periods of the day. They claim that it cannot be assumed that
the widening of the A2, will relieve traffic pressure on the B90. However, we note that
any proposals for the housing zonings will be subject to a detailed Transport
Assessment. In terms of sewerage infrastructure overload, flooding and overflow on the
Shore Road we note that the relevant statutory bodies where consulted and raised no
objections. Accordingly, we recommend no change to the Plan as a result of these
objections.
WHITEHEAD

OBJECTIONS TO THE SETTLEMENT LIMIT

General objection to the Settlement Development Limit
(Objection 2023)

The objections stated that the SDL for Whitehead was too restrictive and will limit potential growth of the town. We have considered the strategic issue of housing need in Part 1 of our report. In the absence of specific lands being identified for inclusion we are unable to give further consideration to the settlement limit in the context of this particular objection. Other individual objection sites will be considered in the remainder of the report. We recommend no change to the Plan as a result of this objection.

Lands at McCrae’s Brae
(Objection 2811)

This objection sought the inclusion of lands to either side of McCrae’s Brae within the SDL for residential development and their exclusion from the AOHSV. The site was reduced at the Inquiry. The objector claimed that the lower slopes do not merit designation as an AOHSV, and the provision of high quality housing would improve the visual appearance of the entrance to the town and soften the abrupt northern edge of the settlement limit by providing a new tapering edge to development.

The objection site lies within the extensive Islandmagee AOHSV to the east of Whitehead. We consider that the objection site reads as an integral part of the rising, prominent and elevated slopes of the AOHSV.

The objection site rises steeply to the east from the Islandmagee Road and can be viewed from both short and long range views. Whilst we accept that the northern edge of the SDL presents an abrupt edge, it is clearly defined by the curtilages of dwellings on this rising ground. The proposed limit is undefined on the ground, cutting across roadside fields and a minor road. We consider that any development on this elevated objection site would appear prominent extending intrusive development to the north across open countryside notwithstanding the low density and landscape buffers proposed. This sprawl of development would be detrimental to the setting of Whitehead and would adversely the integrity and openness of the AOHSV which is justified at this location.

Our conclusions on the housing land allocation for Whitehead are set out in Part 1 of our report. Zoning of the site for housing would result in an allocation which is not required and in an unacceptable extension of the settlement limit. Accordingly we recommend no change to the Plan.

Lands at Slaughterford Road
(Objection 1699)

The objector sought inclusion of land north of the junction of Slaughterford Road and Larne Road. The southern part of the site contains a bar and restaurant with associated parking areas. It lies within the Whitehead LLPA. To the north of this is the Bentra golf
course. The existing SDL in this location is clearly and strongly defined by the Slaughterford Road and the Larne/Belfast Road. Development on the objection site would extend development in a north westerly direction beyond the road junction and create an illogical protrusion of the development limit to a much weaker limit than exists at present notwithstanding the presence of a building on part of the objection site. We recommend no change to the Plan.

TRANSPORTATION

Objection to lack of Park and Ride Facilities in Whitehead
(Objection 929/3)

The objection was to the absence of proposals for the expansion of the Park and Ride facilities in Whitehead which are already overstretched, to encourage commuters to use public transport. In view of Whitehead’s role as a commuter town, the Plan’s emphasis on public transport and the fact that the Park and Ride is well used, we agree that there is merit in its expansion. However, the objector did not identify any specific area in support of the objection. Accordingly, whilst we note the constraints of the Town Centre for the expansion of Park and Ride facilities, we remit this issue to the Department for further consideration.
SMALL SETTLEMENTS

General objections to Settlement Limits of Small Settlements
(Objections 2011, 2013)

Elevate made objections to both small settlement development limits. We have recommended that the limits of small settlements are strictly controlled in Part 1 of our report. We cannot therefore agree with the argument that the settlement limits are too restrictive. We consider that the limits allow for sufficient growth in the context of small settlements being at the bottom of the settlement hierarchy. We do not agree that Trooperslane is distinguishable from other small settlements because it has a railway station in view of its position in the settlement hierarchy. Accordingly, we recommend no change to the Plan as a result of these objections.

TROOPERSLANE

Lands at Upper Road
(Objection 3223)

We consider that the inclusion of this large objection site would at least double the size of the settlement resulting in development out of scale relative to its size.

The SDL is clearly defined to the north west by Upper Road. Development on the objection site would break into the open countryside extending development onto prominent land to the north. This would represent excessive growth and urban sprawl which would be detrimental to the setting to the settlement on approach from the west and east on Upper Road. Such development would therefore neither consolidate the existing settlement nor keep it compact. Accordingly, we recommend no change to the Plan.

KNOCKNAGULLIAGH

Lands at Belfast Road
(Objection 116)

This objection sought the inclusion of land to the south west within the development limit. The SDL is clearly defined by the curtilage of number 92 Belfast Road. Although defined by vegetation, inclusion of this roadside objection site would extend the existing ribbon of development along the road into the open countryside. It would not consolidate the existing settlement or keep it compact and we recommend no change to the Plan.