

PLANNING APPEALS COMMISSION

The Planning (Northern Ireland) Order 1991

Article 7

**EXAMINATION IN PUBLIC INTO OBJECTIONS TO THE
DRAFT NORTHERN AREA PLAN 2016**

SECTION 3

COLERAINE BOROUGH COUNCIL

Report by

Commissioners G Scott, R Daly and D O'Neill

**Examination Dates: 19 September – 6 October 2011
23 January – 22 March 2012**

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3.1 COLERAINE

HOUSING

- 3.1.1 Coleraine is the largest town in the Plan area and is identified in the RDS 2035 as a Main Hub. Designation CE01 proposes a Settlement Development Limit (SDL) for Coleraine and is identified on Map No 3/01a.

Plan Provision for Housing

- 3.1.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 3742 housing units in Coleraine town. Between January 1999 and August 2010 some 1666 housing units were completed. The housing updated Paper of March 2011 estimated that up to 5040 housing units could be accommodated within the settlement over the Plan period with a surplus of some 1298 units (34.7%) above the Plan allocation. Based on the take up rates between January 1999 to August 2010 the Department estimates that the total provision represents a 21 year land supply for Coleraine.

Social Housing

- 3.1.3 The updated (March 2011) Housing Need Assessment figures, indicated a substantial increase in social housing need for Coleraine, of some 230 units for the next 7 year period (2011- 2018). This marks a significant increase from the stated 15 social housing units in September 2004. Nonetheless at the EIP the NIHE stated that this social housing need could be met within the existing housing zonings in the Plan. These zonings include CEH34, CEH40, CEH52, CEH53, CEH62 and CEH63. The Department withdrew Housing Zoning CEH40 at the EIP as updated flooding records show that this land may be subject to flooding. On this basis we concluded there is no need for additional land to be included within the SDL to meet Social Housing Needs. We recommend that the Plan should reflect the withdrawal of Housing Zoning CEH40.

Phasing

- 3.1.4 The issue of phasing housing supply has already been addressed in section one of this report. Phase 2 Housing Zonings now have the same status in the Plan as Phase 1 Housing Zonings. We therefore recommend that all references to the phasing be removed from the Plan.

Settlement Development Limits (SDL)

- 3.1.5 We concluded in section one of our report that there is no strategic need to allocate further housing land in Coleraine town. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing requirements over the Plan period. Accordingly we do not support the objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of NEAP 2002. In these circumstances, as stated in section one of our report, any extension of the SDL or zoning of additional housing land will only be

considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections which are seeking the expansion of the SDL of Coleraine and the zoning of additional housing land within the settlement.

Sites outside the SDL

- 3.1.6 Our assessment of the objections is made on a clockwise basis, commencing with the North East.

North East – Ballyrashane Road (B67) north to Portstewart Road (A2) East

- 3.1.7 The area around **Ballysally House** was considered by objection 331 to be suitable for inclusion within the SDL for housing. Two separate objections were made. The scale of the first site (522 acres) is of such a magnitude that individually it would entail an unjustifiable urban extension of limits of Coleraine. The second objection included a map indicating land noted as '1' situated around Ballysally House. The land indicated on the map appears to already be within the SDL, partly as an area of open space and partly within the proposed LLPA designation CEL04 University LLPA. It is noted from the Department's submitted flood maps that part of this land is subject to flooding, making it unsuitable for housing. This combined with a lack of persuasive need for more zoned housing land means the objection is not sustained.
- 3.1.8 Land at **Glenfield House, Atlantic Road (B185)** was considered by objections 336, 5144 & 5763 to be suitable for inclusion within the SDL for housing. The site is some 7.7 hectares. Glenfield House is a listed farm house with an associated farm yard. The farm is set back from the Atlantic Road, by means of a tree lined avenue. The draft Plan has recognised the importance of this listed building and its associated setting and landscaping through the proposed LLPA Designation CEL02 Dundooan. Other constraints on this land include an unscheduled monument to the middle of the site and high voltage electricity pylons located to the western side of the site. Rivers Agency has also confirmed that part of the site is located within a river flood plain. Given these site constraints, combined with the 'intrinsic' visual value that it provides to the setting of Coleraine, as viewed from the Atlantic Road, we consider the inclusion of this land within the SDL is not justified for environmental and visual reasons.
- 3.1.9 Objections 331, 4836, 5047 & 5763 relate to the inclusion of some 19.3 hectares of land at **Cloyfin Road/Ring Road (A29)** for residential use. The site is bounded to the north by the Cloyfin Road, to the east by the Ring Road (A29), to the west by the North Coast Integrated College and to the south by housing at Beechfield Park. At present the site is agricultural land with a farm group including a 2 storey farm house and outbuildings towards the southern part of the site. This farm group is accessed from Cloyfin Road along a laneway flanked by mature trees and hedgerows. The farm group with its associated landscaping has been included within the proposed CEL06 Ballyarton LLPA designation. Whilst, the Ring Road provides a clear

defined physical edge to the settlement at this location, the rural character and appearance of the site, including its ridge running north-south, provides an important visual buffer to the edge of the settlement. We agree with the Commissioner's view in appeal (2005/A496) that the topography and appearance of the site mean that when viewed from Cloyfin Road and the Ring Road it does not naturally lie into the urban form. The adjacent open space relating to the College to the west further extends the landscape and visual buffer at the urban edge of Coleraine at this location. Given the site's appearance, scale and size its inclusion within the SDL would result in urban sprawl and would fail to create a compact urban form at this location.

- 3.1.10 The inclusion of some 141 hectares for housing on land **North of Ballyrashane Road and South of Cloyfin Road** was presented by objection 5527. The site also overlaps the above objection sites (331, 4836, 5047 & 5753) extending out to the Boghill Road. At this location the Ring Road (A29) provides a solid and well defined physical definition of the outer edge of the settlement limits. The inclusion of the objection site would significantly breach this boundary giving rise to massive urban sprawl to the north west. The overall scale, size and location of the objection lands mean that it would be inappropriate to include it within the SDL.

South East - River Bann North to Ballyrashane Road (B67) South

- 3.1.11 Objection 296 seeks the inclusion of an extensive area of land between **Newbridge Road and Mountsandel Road (Knockantern)** within the SDL and zoned as Phase 1 Housing Land as part of a comprehensive strategic land release. The objector also stated that in the absence of this land being granted a Phase 1 classification, consideration should be given to the designation of a much smaller portion of land located to the north west corner of the site at the intersection with **Warnock's Lane and Newbridge Road**, as phase 2 housing land. The Department's withdrawal of Policy HOU2 Phasing means that issue of phasing housing land is no longer an issue for consideration. We therefore have to assess this objection in the context of housing land available now for Coleraine. The land is located to south side of the settlement on relatively flat land and is subdivided by mature and semi mature boundary vegetation. The size and scale of this site would not give rise to a compact urban form, especially when there is no need to expand the SDL to accommodate more housing land. The smaller parcel of land is physically detached from the SDL and would therefore not result in a logical expansion to the settlement. Objection 4975 also relates to part of the land to the south of **Newbridge Road, Knockantern** that comprises objection 296 and requests that it should be zoned for housing. The inclusion of this site would expand the SDL further along Newbridge Road giving rise to urban sprawl. We do not recommend any changes to the Plan following consideration of these objections.
- 3.1.12 Objection 4969 seeks the inclusion of land to rear of **25 to 35 Mountsandel Road**. The original objection requested that the land should be zoned for housing but at the EIP the objector withdrew this request seeking that if the land was not considered suitable for housing that it should be considered as white land within the SDL. The objection site relates to steeply sloping land along the east side of the River Bann and south of Sandelford Bridge which

has been removed from the SDL in the extant NEAP Plan. The land is approx 800 metres south of the proposed town centre boundary and is characterised by a strong belt of vegetation which provides an important setting to the edge of the river at this location. The lower part of the site is within the flood plain which is an obvious constraint to development at this location. Irrespective of other sites being historically developed in the flood plain in this area and the objector's recollection of no flooding on the objection site, the precautionary principle for development in the flood plain applies. Whilst on the same side of the river, the land to the north of Sandelford Bridge does not share the same visual, environmental and topographical characteristics as the objection site and they are not a reason to include additional development land in this visual and environmentally sensitive landscape. The area zoned for housing in CEH56 continues the existing housing along the frontage of Mountsandel Road at this location. Even with the use of strict KSRs to exclude the lower levels of the site and retention of vegetation we agree with the Department that the development of this site as white land or for housing would be contrary to the Plan objectives, which seek to protect the setting of the settlements including river banks. We consider that that this land should remain outside the proposed SDL for Coleraine.

- 3.1.13 Objection 5220 seeks the inclusion of a small portion of land set behind existing detached dwellings along **the South West side of Mountsandel Road**. The portion of land also falls within the proposed LLPA CEL13 Knockantern, which partially overlaps with a Historic Park, Garden and Demesne. Upon inspection of the maps it appears the objection site is already within the SDL, and we note that development (C/2003/1170/F) of two new residential units has taken place on the objection site. We recommend no change to the Plan following consideration of this objection.
- 3.1.14 Objection 5527 relates to a substantial portion of land that stretches from **Newmills Road** in the south to along **Ballyrashane Road** in the east. The site is relatively flat and overlaps a number of private dwellings, businesses and Ballyclabber Church. Its location physically breaches the well defined SDL boundary to the east provided by the A29 Ring Road. Its inclusion within the SDL would result in massive urban sprawl to the east side of Coleraine. A portion of the site along the Ballyrashane Road also lies in the flood plain. Housing on a site of this scale would protrude into the open countryside and would not provide a defensible limit. The SDL should not be breached at this location.
- 3.1.15 Objection 5720 seeks the inclusion of land incorporating A Diamond & Sons Sawmill at **35 Newmills Road** within the SDL. Notwithstanding the presence of the existing business the site is physically separated from the SDL by the existing Belfast railway line, which provides a natural and defensible limit. The inclusion of this 'L' shape objection site would not give rise to a compact urban edge to the settlement at this location.
- 3.1.16 Objection 5755 relates to the expansion and redistribution of land uses to the **south of Ballycastle Road and adjacent to Newmills Industrial Estate**. At the EIP the original objection site was reduced to a 9.11 hectare site of overlapping land at the central area of Existing Industrial Zoning CEI01 and

the entire zoning CEI10. This area represents one of the largest industrial areas in the town. The objection sought that the amended objection site would be zoned for housing on the basis of the adjacent approved housing to the north, tying in the surrounding Church and Community Club approvals. WD Meats Factory is located immediately east of the amended objection site. Whilst the use of the land included within the CEI10 was disputed at the EIP in conjunction with the meat factory, its close proximity to the factory would give rise to major environmental concerns for residential development of the proposed scale. It would give rise to concerns relating to noise, odour and traffic in this immediate area, as acknowledged by the objector's submission. We accept the Department's view that zoning this land for housing would not be logical and that the information provided in the WYG report is not sufficient to warrant the zoning of this land for housing purposes of itself. Part of the site would also be subject to flooding which would present further constraints for residential development on this land. The housing land at CEH42 located to the south west of the site is physically and visually separated from the industrial land by the railway and would also be further away from the Meat Factory than the objection site. The industry zoning is one of the largest in Coleraine and without a strategic need for additional housing we do not consider that it would be appropriate to remove either industrial sites CEI01 or CEI10 from the Plan. Having reached this conclusion we see no merit or justification for expanding the SDL to the east side of the Ring Road to accommodate the industrial land that the objector proposed to be displaced from CEI01 and CEI10. The objection is not sustained.

South West - Windyhill Road/Carthall Road (B201) south to River Bann South

- 3.1.17 Objection 331 relates to land at **Somerset Forest**. This objection is to the tightening of the SDL around Coleraine and the new policy designations which relate to this now excluded land. No evidence was presented to substantiate this objection or to explain what changes the objector is seeking to the Plan. Objection 5502 relates to the same portion of land at **Somerset Forest** seeking the inclusion of the land within the SDL and its allocation as housing land. The objection site is situated to the south of Coleraine, off the Castleroe Road and bounded to the south and west by Somerset Forest and to the north by residential development at the Paddocks. A site of this scale, some 4.7 hectares, would represent a significant expansion to the south of the settlement, extending development further along Castleroe Road towards the settlement of Castleroe. Its inclusion within the SDL would result in urban sprawl and would close the visual and physical gap between the respective settlements. The objection site is also covered by the proposed LLPA CEL 19 Somerset Woods designation including a TPO and a SLNCI designation. Notwithstanding, the conclusion in planning appeal decision 2006/A0690 that many of the environmental constraints to the site could be overcome through sensitive and appropriate design respecting the site's environmental attributes, we are not persuaded that inclusion of this site would provide a logical edge to the SDL. Whilst the land was included within the SDL of the extant Plan this does not of itself justify its retention in the replacement Plan. We recommend no change to the Plan following consideration of this objection.

- 3.1.18 The **Greenhall Highway, north of Ashbourne Park** provides a natural and defensible settlement boundary for land to the west of it. We do not support objection 331 seeking the inclusion of land **opposite Housing Zoning CEH62 and CEH63** within the SDL.
- 3.1.19 Objection 333 seeks the inclusion of some 2.8 hectares of land within the SDL at **Farranlester Road**. This is a short road which leads off and links back to the Dunhill Road (A29). The Dunhill Road is a main route from the west into Coleraine. The Department concerns relating to the ESL over the site could be addressed through design. Whilst the objection site wraps around development on the ground it is not physically linked with the edge of the proposed SDL. The inclusion of this land would give rise to urban sprawl and would not contribute to achieving a compact urban form.
- 3.1.20 Located on land to the **rear of Ashbourne Park, off Greenhall Highway** objection 4463 seeks the inclusion of three large fields for housing land. Churchland Lane is a private lane way leading to a farm group from Ashbourne Park, which runs through the middle of the site. The land is bounded on two sides by housing development and in that respect its inclusion within the SDL would not be illogical, notwithstanding the elevated nature of the land. However, given the over provision of housing land in Coleraine we conclude that there is insufficient justification for its inclusion within the SDL.
- 3.1.21 Objection 5206 seeks the inclusion of some 2.1 hectares of land leading of **Lismurphy Avenue** for housing. This linear site comprises four small fields, which are collectively bounded by housing on three sides and would represent a rounding off to the edge of the settlement at this location. The Department has raised concerns regarding the sites proximity to the ESL and the neighbouring engineering works. We are not persuaded that these issues should prevent development of this site. However, given the over provision of housing land in Coleraine we conclude that there is insufficient justification for its inclusion within the SDL.
- 3.1.22 On an extensive area of land at **Bushtown Road**, objector 5527 sought its inclusion within the SDL for housing. The site comprises part of Somerset Forest which is visible on approach to Coleraine from the Bushtown Road. This area of land makes a significant contribution to the setting and approach to Coleraine along this road. The central part of the site is subject to flooding and a flood risk assessment would be necessary. Part of the site overlaps LLPA CEL19 Somerset Woods. The inclusion of such an extensive area of land within the SDL would result in a significant and obtrusive urban extension to the south western side of the settlement. This scale of urban sprawl means that it is appropriate that this site is excluded from the SDL.

North West - Portstewart (A2) and Windyhill Road/Carthall Road (B201) north.

- 3.1.23 Objections 331 both seek the inclusion of large portion of land to the north west. One objection was accompanied by a map relating to the **Ballycairn Area**. The map indicated a north westerly expansion of the settlement running from the Cranagh Road across the River Bann to the Portstewart

Road. The inclusion of the land which rises up and for its majority provides an important backdrop to the settlement. Its inclusion would present unnecessary urban sprawl to the north west of the settlement. We therefore would not support the inclusion of this land within the SDL.

- 3.1.24 Objections 4317, 4544, 4545, 4573, 5201, 5490, 5570, 5571, 5572, 5573 & 5574 seek the inclusion of some 10.2 hectares of land adjoining **21 Wheatsheaf Road** for housing purposes. The land is bounded by the Wheatsheaf Road to the east and the Windyhill Road to the South. This area of land forms part of a ridge to the western side of the settlement, looking down towards the central area of the settlement. In this area the Wheatsheaf Road also defines a physical edge to the SDL. With the exception of a farm group this portion of land is relatively undeveloped. The development potential of this farm group is a matter to be assessed in the context of other prevailing regional policy for the countryside. Further expansion of the settlement in this westward direction would result in urban sprawl. The location of the site close to other settlements and local services is not a reason by itself to include this land within the SDL.
- 3.1.25 Objections 4829 & 5763 relate to land to the **east and west of Ballycairn Road**. Objection 5047 includes two fields to the **east of Ballycairn Road**. All of the objections seek the inclusion of land for housing. The land to the east falls down towards the railway line which runs parallel to the River Bann at this location. The inclusion of any of this land would lie into the surrounding urban form, given it is surrounded by residential development and the railway line to the east. However, the over provision of housing in Coleraine outweighs the site specific characteristics of this land. We consider that this land should remain outside the SDL.
- 3.1.26 On the western side of **Wheatsheaf Road** opposite the Granary Housing development and next to the Quilley Road junction objection 4858 seeks the inclusion of a small area of land within the SDL. The objection site overlaps a number of roadside dwellings and associated outbuildings, the character of which is essentially rural in appearance. Their character is a contrast with the suburban residential character on the opposite side of the road. Notwithstanding the existence of these properties, Wheatsheaf Road provides a clear and distinct physical edge to the SDL at this location. The inclusion of the objection site would result in a suburban development form and one that would more than simply consolidate the roadside gap between Nos 3 and 9 Wheatsheaf Road. Since we consider that the inclusion of this site would not provide a cohesive settlement limit at this location any infrastructure and locational benefits do not override this conclusion.
- 3.1.27 Objection 5527 seeks the inclusion of a substantial portion of land for housing at **Ballycairn Road/Cranagh Road**. The inclusion of a site of this scale would represent a large extension to the SDL for Coleraine and would significantly alter the setting and approach to the settlement at this location. It would result in excessive urban sprawl to the north west of the settlement. It would fail to promote a compact urban form. This land should remain outside the SDL.

- 3.1.28 Objection 5755 also seeks the inclusion of some 194.4 hectares of land to the north west of the settlement in the **Ballycairn Area, from Mastermagee Road in the south across the River Bann to the Portstewart Road and Drumslade Road**. This would represent an excessive urban extension to Coleraine, and would bring the settlement closer to Portstewart. The inclusion of land of this scale would not give rise to the creation of a compact urban form. It is appropriate that it remains outside the SDL.

Zoning of Land for Housing within the SDL

- 3.1.29 Objection 4572 relates to a roadside dwelling set within a mature curtilage at **1 The Elms, Atlantic Road**. The site is bounded on two sides by vacant proposed zoned housing land at CEH47 Shell Bridge North and CEH23 adjoining Ballysally Primary School. Planning permission has been granted on the site for residential development. The objector is seeking the inclusion of the site within the adjoining zoned housing. The inclusion of this land within the neighbouring zoned land would present a logical form of residential development and provide a greater opportunity for the comprehensive development of housing land to front the Atlantic Road. Accordingly, we accept the objection site should be included within Housing Zoning CEH47 Shell Bridge North.
- 3.1.30 Objection 5048 relates to a detached building at **Ratheane House at 85 Mountsandel Road**, used as a veterinary surgery. The building is set within the context of predominantly residential development. The objection seeks that this site is zoned as housing land. The Department has confirmed that planning permission was granted for 22 apartments on the site in January 2008 (C/2005/0674/F). The Department has considered this site as part of the existing housing commitments for Coleraine. There is no need to zone it for housing. We therefore do not recommend any change to the Plan following consideration of this objection.
- 3.1.31 Objection 5143 seeks that land at **35 Milburn Road** is zoned for housing. This is a small site set back from Millburn Road and backing onto Westbrook Crescent. Planning permission (2006/A0315) was granted for 5 dwellings on the site. The Department has considered this site as a housing commitment for Coleraine. There is no evidence to justify why the site should be zoned housing land. We recommend no change to the Plan arising from this objection.

Recommendations

- 3.1.32 **We recommend that:**
- **Map 3/01a and the supporting text in Volume 2 District Proposals, Page 79 is amended to take account of the withdrawal of Housing Zoning CEH40 from the Plan.**
 - **Any reference to the phasing of housing zonings should be removed from the Plan.**

- **Objection site 4572 is included within the adjacent Housing Zoning CEH47 Shell Bridge North.**

HOUSING ZONINGS

3.1.33 The main issues raised by the objections include:

- (a) The housing zoning should be flexible to permit other uses on the land;
- (b) The KSR should be amended or deleted; and
- (c) Land should not be zoned for housing.

The Housing Zonings should be Flexible to permit other Uses on the Land.

3.1.34 Objection 4859 to Housing Zoning **CEH33 30 Mountsandel Road** argued that commercial/retailing zoning should be coupled with the housing zoning on this site. Planning permission (C/2005/0239/F) has been granted on this site for 185 residential units which make an important contribution to the housing requirements for Coleraine. This objection was not substantiated with evidence to explain why commercial or retail uses would be better suited to this site. Accordingly this housing zoning should not be amended in the Plan.

3.1.35 Objection 4406 to Housing Zonings **CEH37 2 Beresford Place & CEH58 Spittal Hill, Bushmills Road** was sought on the basis that these housing zonings should incorporate flexibility to permit other suitable uses. PPS1 paragraph 35 sets out the purpose of development plans is to inform the general public, statutory authorities, developers and other interested bodies of the policy framework and land use proposals that will be used to guide development decisions within their local area. Therefore zoning these sites for housing gives a level of certainty to the public. The objector did not substantiate why housing zoning CEH58 would require flexibility, therefore we are not persuaded this site would require any further KSR. This objection is not sustained. In respect of Housing Zoning CEH37 both the objector and Department have confirmed that this housing zoning has been incorporated into the approved (C/2005/1253/F), but unimplemented, Tesco redevelopment scheme. The Department has stated that the loss of this housing zoning would not cause any harm to the Plan's Strategy for Coleraine. We therefore recommend that based on planning history that housing zoning CEH37 2 Beresford Place is removed from the Plan as this will permit flexibility for the future development of this site.

The KSR should be Amended or Deleted.

3.1.36 Objections 331 to the KSR relating to housing density for Housing Zonings **CEH21, CEH22, CEH23, CEH24, CEH25, CEH47, CEH50 & CEH57** argued that the minimum gross density applied to each of these sites is far too low. However none of the objections substantially explained why or to what extent the housing density should be amended in the Plan. Having looked at all of the recommended densities as presented by the Department we are not persuaded that there is any justification to amend the densities presented in the draft Plan for these Housing Zonings.

- 3.1.37 Objection 4570 to Housing Zoning **CEH23 adjoining Ballysally Road** on the basis that access should be facilitated through the south western boundary of the housing zoning linking with housing zoning CEH47. The Plan does not present any restrictions to integrating these two housing zonings. It is therefore not necessary to amend the KSR or wording relating to housing zoning CEH23. This objection is not sustained.
- 3.1.38 Objection 5674 made a generic objection to KSR 2 of Housing Zonings **CEH23 Adjoining Ballysally Primary School, CEH24 Daneshill Road, CEH25 South of Loughestown Industrial Estate, CEH26 Tullyarton Road, adjoining Harpurs Hill Primary School, CEH29 adjoining Ballysally Presbyterian Church, CEH33 30 Mountsandel Road, CEH46 Willowfield South, CEH47 Shell Bridge North, CEH48 Loughestown North, CEH49 Ballycastle Road South, CEH52 Lisnablagh Road North East & CEH57 Adjoining Rochester Court.** The objector requested that the wording should be changed from “development shall *generally* not be greater than two storeys in height” to read “...*shall not be more than two storeys high*”. No reasoned argument was presented to justify placing this more onerous requirement on these sites and in those circumstances we cannot support the objections.
- 3.1.39 Objection 5674 to KSR1 of Housing Zoning **CEH27 Adjoining 550 Windy Hall** on the basis that the density would impact on the traffic levels at the proposed access to Hall Road with Newbridge Road. The objection also related to the access point onto Hall Road. This is a small housing zoning relating to some 0.12 hectares. Even at a yield of 35 dph it would only provide around 4 residential units. We are not persuaded that the level of housing that could be developed on this site would make a significant difference to the traffic in this area. Accordingly this objection is not sustained.
- 3.1.40 Objection 331 to Housing Zoning **CEH28 Sandel Centre, Knocklynn Road** is to KSR3 and objection 5674 was made to this site on the basis of a need for a traffic management strategy. Subsequent to the submission of these objections commercial development has been built on this site. We therefore consider it is only logical that the Housing Zoning is removed from the Plan.
- 3.1.41 Objection 5674 to KSR 4 of Housing Zoning **CEH30 Cloyfin Road** that access to the Cloyfin Road should have a mini roundabout in the interests of road safety and that such a development should not be permitted without a workable and planned strategy. No evidence was presented to substantiate why this would be required. This is a matter that would be assessed during the consideration of any development proposal on the site. Accordingly this objection is not sustained.
- 3.1.42 Objections 4435, 4577, 4582 & 5704 to Housing Zoning **CEH31 Knocktarna** were made on the basis that KSR 1 relating to housing density is too high. Objection 331 was made on the basis that this Housing Zoning is adjacent to industrial land and is adjacent to the designation CEL12 Knocktarna LLPA. Objection 5321 also sought the amendment of the KSR, but presented no evidence on what amendments were sought. At the EIP the Department

stated that given the planning history relating to this site that they now wished to withdraw this Housing Zoning from the Plan.

- 3.1.43 Objection 331 to KSR 4 of Housing Zoning **CEH32 Adjoining Maybrook Park** on the basis that the site can't be accessed from a public road system and additional lands are required to provide an access to this site. According to the Department's Planning History planning permission (C/2006/1055/F) has been granted for 12 residential units on the site and we note that development of the site has commenced. The grant of permission demonstrates that KSR 4 can be met in order to achieve access to the site. This objection is not sustained.
- 3.1.44 Objection 5674 to Housing Zoning **CEH36 Riverdale** was made on the basis that the KSR 1 relating to the density on the site would indicate apartment development. The objector also seeks that development would not exceed three storeys. The height of the buildings on this housing zoning has been specified by KSR 2 which is not greater than three storeys. Any additional necessary surveys on the site will have to be carried out to the Department's satisfaction. We therefore don't consider that this objection warrants any change to the Plan.
- 3.1.45 Objection 5674 to Housing Zoning **CEH37 2 Beresford Place** and **CEH39 23 Mountsandel Road** was made on the basis that additional KSR should be added for a 5/6m buffer zone and cycle path. No evidence was presented to substantiate why these requirements were necessary. We note that there are KSR relating to both zonings that require a pedestrian/cycle link along the River Bann. Accordingly this objection is not sustained.
- 3.1.46 Objection 331 to Housing Zoning **CEH41 Adjoining St Malachy's School, Beresford Avenue** on the basis that the KSR 3 cannot be met. The objector's evidence relating to no extra land and the unwillingness of the school or church to sell land is unsubstantiated. Accordingly we are not persuaded that this housing zoning should be removed for this reason.
- 3.1.47 Objection 331 to Housing Zoning **CEH46 Willowfield** on the basis that KSR 4 is not logical. Housing development has already commenced on this site. The Atlantic Road is a busy route from the north into the centre of Coleraine. It is logical that "direct individual" access should not be permitted to or from the Atlantic Road. This KSR does not prevent a collective access onto the Atlantic Road. This objection is not sustained.
- 3.1.48 Objection 4570 to Housing Zoning **CEH47 Shell Bridge Road North** on the basis that KSR 3 does not 'permit vehicular access to Shell Bridge Park'. Shell Bridge Park is a housing development located to the south of Housing Zoning CEH47. Full planning permission (C/2008/0883/F) has been granted on housing zoning CEH47 for 117 units, with access connecting into Shell Bridge Park. This clearly demonstrates that access and servicing arrangements can be satisfactorily linked with the adjacent housing development at Shell Bridge Park. We therefore support the amendment of KSR3 removing the wording "no vehicular access will be permitted to Shell Bridge Park".

- 3.1.49 Objection 331 to Housing Zoning **CEH48 Loughestown North** on the basis that KSR 4 requires additional lands to provide access from Burn Road/Daneshill Road. The objector's assumption that there is no guarantee that land will be made available was unsubstantiated. This objection is not sustained.
- 3.1.50 Objection 5457 to Housing Zoning **CEH49 Ballycastle Road South** related to the KSR, but presented no evidence on what amendments were sought. This objection is therefore not sustained.
- 3.1.51 Objection 5381 to Housing Zoning **CEH51 Laurel Lodge** sought the deletion of the KSR, but presented no evidence to substantiate why. This objection is not sustained.
- 3.1.52 Objection 331 to Housing Zoning **CEH52 Lisnablagh Road North East** on the basis that KSR 5 indicates that part of the site is subject to periodic marginal flooding. This KSR of itself does not mean the site is not suitable for housing, it highlights that this is an issue that must be taken into account when designing a development proposal on the site. Accordingly this objection does not warrant the removal of this housing zoning from the Plan.
- 3.1.53 Objection 5597 to Housing Zonings **CEH62 Hazelbank North & CEH63 Hazelbank West** on the basis that all public rights of way are protected during construction. The maintenance of these rights of way is the responsibility of the land owner. However the Department confirmed that they are not part of the housing zonings, this is evident on Map 3/01a.
- 3.1.54 Objections 331 & 5153 to KSR 1 to Housing Zoning **CEH65 Ballyarton South** are on the basis that given the context of the site the housing density could be higher. Recent housing at Grasmere has been developed on the majority of this housing zoning. No evidence was presented to support why the remaining part of the housing zoning should have a higher density. We are not persuaded that the housing density set out by KSR 1 should be amended. Objection 5674 also to this housing generally agrees with the zoning but states that greater emphasis should be given to providing a suitable access not only from the zoning, but from the entire development site onto Ballycastle Road, in the form of a mini roundabout. As noted already this zoning has been partially developed. Accordingly these objections are not sustained.
- 3.1.55 Objection 331 to the KSR relating to Housing Zoning **CEH66 Wattstown** being too restrictive was not substantiated.

Land should not be Zoned for Housing

- 3.1.56 Objection 331 to Housing Zoning **CEH26 Tullyarton Road, adjoining Harpurs Primary School** was made on the basis that this housing zoning will result in the loss of open space. This site does provide an area of open space in this area. It appears to be linked with adjacent primary school and other education buildings in this area. However in the surrounding area there does is significant open space provision within easy walking access to this area, such as The Crescent Playing Fields and land at Lisnablagh Road. The

locational benefits of this site being close to the primary school, local shops and other housing outweigh the need to protect this area of land as open space. Accordingly we recommend maintaining Housing Zoning CEH26 on this portion of land.

- 3.1.57 Objection 5710 to Housing Zonings **CEH26 Tullyarton Road, adjoining Harpurs Hill Primary School and CEH49 Ballycastle Road** has been made on the basis that the Northern Ireland Fire and Rescue Service require a 1 hectare site in this area. No evidence was presented to demonstrate why these housing zonings were essential to meet their needs over other land in this area. We are not persuaded that these housing zonings should be removed for this reason from the Plan.
- 3.1.58 Objection 331 to Housing Zoning **CEH27 Adjoining 550 Windy Hall** is made on the basis that site is considered to be too small to make any significant contribution to the housing need for Coleraine. This Housing Zoning relates to a 0.12 hectare site, adjacent to Windy Hall Park, which is a larger area of housing. The development of this area of land would sit neatly as an extension to the larger area of adjacent housing. Accordingly, irrespective of its size Housing Zoning CEH27 should remain in the Plan.
- 3.1.59 Objection 331 to Housing Zoning **CEH29 Adjoining Ballysally Presbyterian Church** was made on the basis that this land was unsuitable due to its location beside the Presbyterian Church. This objection was not substantiated. Given that residential development is the predominant land use in this area this objection is not sustained.
- 3.1.60 Objection 331 to Housing Zoning **CEH30 Cloyfin Road** was made on the basis that this land is unsuitable for housing because of the LLPA designation CEL03 Shell Hill and Hermon Lodge. The LLPA designation runs along the south west boundary of the Housing Zoning. This area is part of a copse of trees which the LLPA designation aims to protect. The existence of the LLPA designation does not prohibit the development of this part of the site but requires that any development is sensitive to the key features identified through the LLPA Designation. Accordingly this objection is not sustained.
- 3.1.61 Objection 331 to Housing Zoning **CEH33 30 Mountsandel Road (former Coleraine Hospital Site)** on the basis that Housing Zoning is not a suitable land use adjacent to St Joseph's Secondary School. This element of the objection was unsubstantiated. Planning Permission (C/2005/0239/F) was granted in February 2008 for 185 dwellings on the site. Furthermore, no evidence was presented to justify need for another KSR relating to a buffer between the school and the Housing Zoning. Accordingly we recommend that this Housing Zoning shall remain in the Plan without any additional KSR relating to a buffer.
- 3.1.62 Objection 331 to Housing Zonings **CEH34 Killowen South & CEH60 Laurel Hill** on the basis that this land is unsuitable for housing because of the Designation CEL 17 Laurel Hill LLPA. This LLPA has been designated to maintain the parkland in this area that provides the setting to a listed building at Laurel Hill. This designation does not prohibit development but requires

that development on the site respects the key features of the LLPA. Accordingly, the Housing Zonings should remain in the Plan.

- 3.1.63 Objection 331 to Housing Zoning **CEH35 Chapelfield** on the basis that the KSR requires too much protection of the existing trees on the site and the stream which runs along the western boundary. The trees are an important feature of the site defining its mature character and setting. The KSR involves the incorporation of the trees within any housing development on the site. This requirement complies well with the planning policy objectives set out in the strategy of the Plan. This objection does not justify the removal of this housing zoning from the Plan.
- 3.1.64 Objection 331 to Housing Zoning **CEH36 Riversdale** on the basis that the KSR requiring a Bat Survey makes the land unsuitable for housing. This is not the case. It merely highlights the issue that there is a possibility of Bats on the site and therefore a survey is required to establish the best approach to addressing the presence of Bats on the site during development. Accordingly this objection does not justify the removal of this Housing Zoning from the Plan.
- 3.1.65 Objection 331 to Housing Zoning **CEH37 Beresford Place** on the basis that the KSR involving a tree, flora and fauna survey makes the land unsuitable for housing. This is not the case. The KSR merely highlights these issues as important considerations when considering development on the site. This objection does not justify the removal of this Housing Zoning from the Plan.
- 3.1.66 Objection 331 to Housing Zonings **CEH38 Rear of 5 Mountsandel Road, CEH39 23 Mountsandel Road and CEH56 Adjoining 23 Mountsandel Road** on the basis that the land falls within Designation CEL16 River Bann and Banks LLPA. The LLPA has been designated to protect the setting of the river which is an important feature in the town. This designation does not prohibit development in this area but requires that development on this site respects the key features of the LLPA. Accordingly these Housing Zonings should remain in the Plan.
- 3.1.67 Objection 331 to Housing Zoning **CEH40 Willowfields Atlantic Road** on the basis that the majority of this site falls within a flood plain. At the EIP the Department stated that they wished to withdraw this Housing Zoning for this reason. We agree that this Housing Zoning should be withdrawn from the Plan and remain as white land within the SDL.
- 3.1.68 Objection 331 to Housing Zoning **CEH42 North East of Coleraine High School** on the basis that this land falls within Designation CEL07 The Brook LLPA. This LLPA has been designated because of the streams, wetlands and woodlands present on the site which are important features which contribute to the character of this area. This designation does not prohibit development in this area but requires that development on this site respects the key features of the LLPA. The reference at paragraph 12.5 page 104 to the LLPA being within the Green Belt relates to designation CEL06 Ballyarton LLPA. Objection 5674 was also to this zoning but on the basis that the site should not be considered for development until a traffic management assessment has been carried out into the possibility of a new road into and

out of Coleraine. A further element of this objection was that any part of the development of this site must protect and enhance Lodge Burn Waterway and no development should be permitted onto the Lodgeway Waterway. The objection did not substantiate why a transport assessment or new road would be justified, or exactly what area should be protected. KSR 5 refers to 'areas of natural interest along and including the stream shall be retained as open space with the minimum disturbance'. This KSR highlights the stream as a constraint on that site that should be protected. Accordingly neither objections warrant any change to the Plan.

- 3.1.69 Objection 331 to Housing Zonings **CEH43 Rear of 52 Mountsandel Road** and **CEH44 South East of Mountfern, Rugby Avenue** are on the basis that additional land might not be released to access this zoning. This is an unsubstantiated assumption. Accordingly these objections are not sustained.
- 3.1.70 Objection 331 to Housing Zoning **CEH45 adjoining Portstewart Road** is on the basis that this land falls within Designation CEL04 University. This LLPA has been designated because of a combination of features which add to the character of this landscape. The housing zoning is a small road side area of this LLPA. The LLPA designation will not prohibit residential development on the site but requires that development respects the identified key features of this area. Accordingly this Housing Zoning should remain in the Plan.
- 3.1.71 Objection 331 to Housing Zoning **CEH49 Ballycastle Road South** on the basis of its suitability adjacent to a memorial garden. We note residential development has already taken place on this land. This objection is not sustained.
- 3.1.72 Objection 331 relates to Housing Zoning **CEH51 Laurel Lodge** but no evidence was provided to substantiate or explain the objection.
- 3.1.73 Objection 331 to Housing Zoning **CEH53 Bannvale North** on the basis that this land falls within Designation CEL25 County Hall LLPA. This LLPA has been designated because of a combination of features which contribute to the environmental quality and character of this area. This housing zoning relates to the northern part of the LLPA. The LLPA designation will not prohibit the residential development on the site but requires that development respects the identified key features of the area. Paragraph 12.20 on page 110 relates to Designation CEL24 Slieve Banna LLPA, which is located outside the SDL. Accordingly this housing zoning should remain in the Plan.
- 3.1.74 Objection 331 to Housing Zoning **CEH54 Adjoining 1 Rugby Avenue** on the basis that this area should remain as open space. This site has now been developed as housing. This objection is not sustained.
- 3.1.75 Objection 5674 to Housing Zoning **CEH56 adjoining 23 Mountsandel Road** was made on the basis that further KSR should be added including a 5-6 metre buffer zone; a cycle pedestrian link outside the buffer zone and a survey for bats, otters badgers and other forms of wildlife, flora and fauna must be carried out. KSR 6 relates to the provision of a pedestrian/cycle link along the entire frontage with the River Bann. The objector did not provide any evidence to substantiate why a wildlife, flora and fauna survey would be

necessary on the site. In any case this information could be requested by the Department during the consideration of a development proposal on the site if considered to be material to the development of the site. Accordingly this objection does not warrant any change to the Plan.

- 3.1.76 Objection 331 to Housing Zoning **CEH58 Spittal Hill, Bushmills Road** is on the basis that the site is a disused quarry. This objection was not substantiated with any evidence to explain why it would be unsuitable for housing and we note that some housing has already been built within this site. Objection 5674 was also to this zoning seeking the inclusion of a development brief and Plan for the adjacent quarry stating that “*when acceptable then housing on the site should be restricted to two storeys in height including the introduction of a tree belt and landscaping*”. KSR3 of this zoning states that “*development of this site is dependent on the satisfactory long term reclamation of the adjoining quarry, and the proper removal and disposal of any contamination within the site*”. Therefore we are not persuaded that it is necessary to require a development brief, it is clearly a matter for the developer to demonstrate in whatever way necessary that they can meet the requirements of KSR3. The objector did not present any information to demonstrate why a two storey restriction is necessary on this large site. It is also standard practice that landscaping will form any part of a residential development in accordance with the prevailing regional policy for housing development. Neither of the objections warrants any changes to the Plan.
- 3.1.77 Objection 331 to Housing Zoning **CEH59 East of Beresford Avenue** is on the basis that this area should have been zoned as open space. The surrounding area is characterised with high density development on the edge of the proposed town centre boundary. Whilst there is an open space zoning to the south east of the site, the housing zoning itself provides a sense of openness which contributes to the character of this area. The site area is only 0.42 hectares which based on the higher density yield of 25 dph would only provide around 10 residential units. We do not consider the loss of this housing zoning would significantly impact on the objectives of the Plan. However, the objector did not substantiate evidence relating to who owned the land and who would be responsible for the maintenance of this land if it were designated as open space. Given this lack of information we cannot support this objection.
- 3.1.78 Objection 331 to Housing Zoning **CEH61 Wattstown** was a statement relating to the location of the site not being on the urban fringe. However, the land lies into other residential development that has in fact already been developed for housing.
- 3.1.79 Objections 331 to Housing Zonings **CEH62 Hazelbank North and CEH63 Hazelbank West** were unsubstantiated with any evidence to justify an objection. Both objections 4836 & 5710 relate to the inclusion of these Housing Zonings for housing and within the SDL. No evidence was presented by either objector to substantiate why this land should not be zoned for housing. Objection 5722 seeks that these housing zonings should be de-zoned and removed from the SDL. The objector did not provide an explanation to justify the removal of these housing zonings. Planning

permission (2006/A1977 & C/2005/1267) has been granted on housing zoning CEH62 and CEH63 is partially developed. This housing land is bounded to the north, south and east by a mix of long established housing and sits well within the urban form. These objections are therefore not sustained.

3.1.80 Objection 331 to Housing Zoning **CEH64 Ballysally East** on the basis that this land should be zoned as open space. No evidence was presented to demonstrate a need for additional open space or who should maintain this open space.

3.1.81 Objection 5710 to Housing Zoning **CEH65 Ballyarton South** has been made on the basis that the Northern Ireland Fire and Rescue Service require a 1 hectare site in this area. No evidence was presented to demonstrate why this housing zoning was essential to meet their needs over other land in this area. In any case as already stated this zoning has been partially developed. We are not persuaded that these housing zonings should be removed for this reason from the Plan.

Recommendations

3.1.82 **We recommend that:**

- **Housing Zoning CEH28 Adjoining the Sandel Centre, Knocklynn Road is withdrawn from the Plan.**
- **Housing Zoning CEH31 Knocktarna is withdrawn from the Plan and that the status of this land should now be viewed as white land in the context of the Plan.**
- **The amendment of wording of Housing Zoning CEH47 Shell Bridge Road North KSR 3 by deleting the wording “No vehicular access will be permitted to Shell Bridge Park where this abuts the south western corner of the site boundary”.**
- **Housing Zoning CEH40 Willowfields, Atlantic Road is withdrawn from the Plan and the site remains within the SDL as white land.**

INDUSTRY, BUSINESS AND DISTRIBUTION

3.1.83 The main issues raised by objections relate to:

- a) Land should be zoned for industry;
- b) The land is not suitable for industry and should be rezoned for alternative uses;
- c) The zoning and KSR should be amended; and
- d) Industrial zoning should be amended to reflect Invest Northern Ireland ownership

Land should be Zoned for Industry

- 3.1.84 Objection 336 seeks the inclusion of some 9.2 hectares of land at **Danes Hill** to be included within the SDL and zoned for Industry. The site falls within the vicinity of Loughan Industrial Estate. This industrial estate has existing vacant land available for future industrial use. The objection site is adjacent to Loughan Hill Industrial Estate located on the outer side of the Ring Road (A29). Roads Service stated that access, at present, can only be achieved from the protected route and for this reason the land should not be zoned. The eastern field has been noted by Natural Heritage to contain a habitat of nature conservation value. A small portion of the land to the western boundary is also in a flood plain. We have already concluded in Section 1 of our report that there is no strategic need for additional industrial land within Coleraine. Whilst the land is located within the vicinity of the Loughan Industrial Estate, it has limited physical linkage with the industrial development contained in Existing Industrial Zoning CEI05. We do not accept that the inclusion of this site would present a natural extension to SDL.
- 3.1.85 Objections 4861 and 5219 relate to lands at **Danes Hill/Gateside Road** and are seeking that the subject land is brought within the SDL and is zoned for industry. Objection 4861 goes further to seek part removal of lands Industrial Zoning CEI14 Loughan Hill with the redistribution of the subject land along Gateshill Road. The objector presented no supporting evidence to substantiate a strategic need for additional or substitution of industrial land at this location. At present a portion of Industrial Zoning CEI14 has been developed and is physically and visually linked with the existing industrial development in this area. Swapping this land or the further development of industrial land along Gateside Road would extend development in a northerly direction. This area of land is also more elevated. The rising topography combined with large industrial units typical in this area would mean development on the subject site would be visually prominent in the area. The physical shape of the objection site to the west side of Gateside Road, when added to the proposed SDL would result in a one field gap between the objection site and the SDL, giving rise to further urban sprawl. No representations have been made to the Plan to include this gap field. The inclusion of the objection site would not give rise to a compact form of development to the edge of the settlement and is therefore not supported.
- 3.1.86 Objection 5575 seeks the relocation of industrial zoning **CEI01 Ballycastle Road and CEI10 Ballycastle Road to land to the east of the Coleraine Ring Road**. The issues relating to this objection are addressed in the above section relating to housing where it was concluded that the zonings proposed by the Plan should not be changed. Development on the land east of the Ring Road would result in urban sprawl and would not provide a logical and defensible settlement boundary. The objection is not sustained.

The Land is not Suitable for Industry and should be Rezoned for Alternative Uses

- 3.1.87 Objection 331 to Industrial sites CEI01 – CEI12 in principle but did not explain on what basis the land was unsuitable for industrial use. We find no

basis in these objections which would warrant the removal of these zonings from the Plan.

- 3.1.88 Objection 4406 objects to the Industrial site **CEI03 Bushmills Road and Industrial Zonings CEI12 Bushmills Road and CEI16 Riverside Business Park** on the basis that flexibility should be permitted for alternative uses where there is sufficient industrial land and an appropriate alternative use comes forward. We have already concluded at strategic level that an appropriate amount of land has been zoned for industry in Coleraine. These objections were not substantiated and we see no basis for introducing the degree of flexibility suggested.
- 3.1.89 Objections 4520 and 5101 relate to brown field land to **the rear of 151-167 Bushmills Road South of Spittal Quarry** within the SDL. The land at present is vacant land. According to the objector it was previously an oil depot, closed some 7 years before the objection was made. The objections are seeking housing on this land and its removal from Industrial Site CEI07 Bushmills Road south of Spittal Hill Quarry. Objector 4520 stated that a planning application (C/2004/1167/0) relating to residential development was with the Department for consideration. According to the Department's Planning History Schedule this residential development was granted permission on 8 October 2007. Notwithstanding the current status of this application having now expired, the Department has considered this site acceptable for residential development. It is our view that this portion of land should be removed from Industrial Site CEI07. As previously noted there is no strategic need to zone further housing land and given the mix of land uses around the site we do not consider it necessary for this land to be specifically zoned as housing land. Accordingly, the objection site should be removed from the industrial zoning and should appear as undesignated white land within the SDL.
- 3.1.90 Objection 4733 & 5183 is to the existing Industrial Site **CEI08 Bushmills Road west of Spittal Quarry** on the basis that the zoning should be removed and alternative uses should be provided for on the site. Objection 4733 specifically refers to housing on the industrial site. This site is occupied by a number of existing commercial buildings surrounded by extensive areas of housing. There is no strategic need for additional housing in this area. The identification of this existing industrial site in the Plan is appropriate. We recommend no change to this industrial site.
- 3.1.91 Objection 5575 seeks the relocation of industrial zoning **CEI01 Ballycastle Road and CEI10 Ballycastle Road to land to the east of the Coleraine Ring Road**. The issues relating to this objection are addressed in paragraph 3.1.16 where it was concluded that there is no need for additional housing land at this location. We consider these industrial zonings should remain in the Plan.
- 3.1.92 Objection 5710 is to the extent of Industrial Zonings **CEI13 Wattstown Industrial Site and CEI16 Riverside Business Park** on the basis of a 1 hectare site to be designated for Ambulance and Fire Services. These zonings would not prohibit such uses in these commercial areas. However, the objector did not present further evidence to substantiate the exact

location for their site. On this basis we are not persuaded that this objection warrants any change to these zonings.

- 3.1.93 Objection 5762 relates to Industrial Zoning **CEI16 Riverside Business Park** and seeks that the land is reallocated as white land or identified as a Development Opportunity Site (retailing). This land has been developed and a Lidl Store currently occupies the site. At the EIP the Department accepted that this land should be removed from the Industrial Zoning CEI16 and should be shown as white land in the Plan. We agree that this is a logical approach given the site is already developed.

The Industrial Zoning and KSR should be Amended

- 3.1.94 Objection 331 relates to an additional KSR requiring an 8-10 metre tree buffer for Industrial Zonings **CEI13 Wattstown Road, CEI14 Loughan Hill Industrial Estate and CEI15 University Business Cluster**. The aim of this buffer is to soften the impact of the industrial zoning on the countryside. Landscaping consideration would form part of any development proposals on these sites. KSR 2 of Industrial Zoning CEI14 already required an 8 metre wide belt of trees and KSR 2 of Industrial Zoning CEI15 requires the retention of the existing woodland on the site. We are therefore not persuaded that an additional KSR relating to a tree buffer is necessary for each of these sites.
- 3.1.95 Objection 331 to **CEI16 Riverside Business Park** requests that no retail outlets are permitted in the area. No evidence was presented to substantiate this objection. Paragraph 5.18 Vol 2 page 91 of the Plan states that it is proposed that there should be no further approvals for retail outlets. This is an issue that would have to be considered on a site specific basis in the context of regional policy should a retail proposal be presented at this location.
- 3.1.96 Objection 4965 was made on the basis that the KSRs to Industrial Zoning **CEI16 Riverside Business Park** were too restrictive to allow for mixed use on the site including housing, convenience shopping and community facilities. The objector provided no supporting evidence to demonstrate a need for more housing or convenience shopping at this location. The Department recognised that the main character of this industrial zoning includes retailing, light industry and leisure uses. The Department has no objection to community uses being included in the KSRs for the site. We accept that that community uses would sit within the existing context of this area. Paragraph 5.18 sets out the supporting text for Industrial Zoning CEI16, this text should be amended to included community use within the final sentence.
- 3.1.97 Objection 5674 relates Industrial Zoning **CEI11 Northbrook Industrial Estate** and neighbouring zoning **CEI10 Ballycastle Road Industrial Estate**, stating that this land should not be released until proper roads infrastructure capable of taking increasing traffic from the industrial estate. However, no evidence was presented to substantiate if there is a problem with the existing infrastructure or what extent the infrastructure would need up graded. The provision of a safe access and the need for a transport assessment would be part of any development proposal coming forward on the site. We therefore

are not persuaded that there is a need to amend the Plan because of this objection.

Industrial Zoning should be Amended to reflect Invest Northern Ireland Ownership

- 3.1.98 Objection 5714 requested that the definition and extent of Industrial Zoning **CEI13 Wattstown Industrial Estate** should reflect the land ownership of Invest Northern Ireland. The area of land in question lies to the western edge of the zoning and abuts the Causeway Hospital. It is a landscaped area included within proposed designation CEL11 Causeway Hospital LLPA. The extra portion of land is relatively small in the context of the zoning, but it does contribute significantly to the setting of the hospital, particularly when viewed from Newbridge Road. The retention of this tree belt provides an important landscape feature to buffer the hospital from the adjacent industrial zoning. We do not consider that this zoning should be extended to include the objection site.

Recommendations

- 3.1.99 **We recommend that:**

- **Objection site 4520 & 5101 is removed from Industrial Site CEI07 Bushmills Road South of Spittal Quarry.**
- **Objection site 5762 is removed from Industrial Zoning CEI16 Riverside Business Park.**
- **Community Use would be acceptable within Zoning CEI16 Riverside Business Park and that the final sentence of paragraph 5.18, Page 91, Volume 2 should be amended to reflect this.**

OPEN SPACE

- 3.1.100 The Plan identifies major areas of open space for information purposes only, relying on policies within PPS8 Open Space, Sport and Outdoor Recreation as the determining policy for these areas. The main issues raised relate to land not being designated as open space.
- 3.1.101 Objection 331 related to Housing Zoning **CEH26 Tullyarton Road, adjoining Harpurs Hill Primary School & CEH59 East of Beresford Avenue** not being designated as open space. These objections have been addressed above (paragraph 3.1.57) where we have concluded that the housing zoning should remain. We are not persuaded that these sites should be designated as areas of open space.
- 3.1.102 Objection 338 relates to land in the **Ballyartan Area, immediately south west of the Bushmills Roundabout**, requesting that this land should be zoned open space. No evidence was presented as to why land outside the SDL should be zoned as open space or how this land would be maintained.

Furthermore no evidence was presented to substantiate a need for further land to be zoned as open space. This objection is not sustained.

COLERAINE AREA OF ARCHAEOLOGICAL POTENTIAL

- 3.1.103 An area of Archaeological Potential has been identified and is shown on Map 3/01a. As we explained in Section 1 of our report, Areas of Archaeological Potential (AAPs) are highlighted in the draft Plan for **information** purposes only. They are not a Plan designation. Consequently we are not in position to address any site specific objections made against this particular AAP or its inclusion on the map.

TOWN CENTRE & DEVELOPMENT OPPORTUNITY SITES

- 3.1.104 Designation CET01 defines the proposed Town Centre boundary for Coleraine. This boundary has been illustrated on Map 3/01b Coleraine Town Centre. The Plan has identified six Development Opportunity Sites in Coleraine, five of them are located in the town centre area and one is located at the Harbour Estate. The Plan also identifies Target Sites where major refurbishment would be considered acceptable.
- 3.1.105 The main issues raised to the Town Centre and Development Opportunity Sites relate to:
- a) Designation CET01;
 - b) Land should be identified as or part of a Development Opportunity Site or as a Target Site; and
 - c) Zonings CET02 – CET07 Development Opportunity Sites.

Designation CET01

- 3.1.106 Objection 331 to Coleraine Town Centre was on the basis that the majority of land identified in this area relates to community facilities, churches and organisations that do not wish to develop their land. It was argued that this has implications for the Plan achieving its objective, set out in the development strategy. However the objector failed to provide substantive evidence to demonstrate this issue or to which land they consider would not come forward for redevelopment. Accordingly this objection is not sustained.
- 3.1.107 Objection 4330 seeks the retention of the town centre boundary defined in NEAP 2002 as it relates to **Brook Street**. No persuasive evidence was presented to justify how the retention of this area would make a difference to the vitality and viability of the town centre. Much of Brook Street area that has been excluded from the town centre in the draft Plan has been redeveloped for new housing and we are satisfied that the defined boundary is a rational response to changing circumstances. Accordingly the objection is not sustained.
- 3.1.108 Objection 4406 was made on the basis that the town centre boundary is too constrained and seeks the inclusion of the full extent of the **Tesco** redevelopment (C/2005/1253/F) site within the town centre boundary. The Department have accepted that whilst there is no overriding retail need that it

would be appropriate to include this site within the town centre boundary to reflect the approved curtilage for the Tesco redevelopment on this land. We accept that this would be logical and therefore recommend that the Designation CET01 Coleraine Town Centre is amended accordingly.

- 3.1.109 Objection 4906 requested the inclusion of properties **5-11 Union Street** within the town centre boundary. Given the commercial use on this site the Department accepts that it should be included within the town centre boundary. We accept this amendment is logical and is justified.
- 3.1.110 Objection 5014 requested the inclusion of land off **Lower Captain Street** to be included within the town centre. The majority of this objection site is already located within the town centre; the small area to the west outside the town centre is occupied by residential development. The objector presented no evidence to justify or substantiate why this development would be better placed within the town centre boundary. Accordingly the objection is not sustained.
- 3.1.111 Objection 5597 relates to a small area of land between **Coleraine Bridge and Waterside** being excluded from the town centre boundary, the open space zoning and the proposed LLPA Designation CEL25 County Hall. The Department stated that this small area has been excluded from the town centre boundary as it relates to an area of open space at the junction of footpaths along the riverside. Its exclusion from the town centre means that this area is consistent with the land north and south of the Old Bridge, where areas of public space have been excluded from the town centre. This objection also brought to the Department's attention an anomaly in the Plan relating to this small area not being within the adjacent area of open space and within adjacent LLPA Designation CEL25 County Hall. The Department at the EIP recommended that these designations should include this objection site. We accept that this mapping error should be corrected in relation to this site.
- 3.1.112 Objection 5722 to **Designation CET01** did not provide an argument to support the objection or outline what changes should be made.
- 3.1.113 Objection 5733 was to **Designation CET06 The Harbour Estate** not being included within the town centre. The town centre provides a different role and function than the facilities in the Harbour Estate. Its designation as an opportunity site signals that it has redevelopment potential. However, without persuasive evidence we do not consider that this area should fall within the town centre boundary as designated by CET01. The objection is not sustained.
- 3.1.114 Objection 5757 was to the lack of reference to living over the shops in the town centre. The issue of living over shops has been addressed in Section 1 of our report where it has been accepted that objective of the Plan should include reference to living over shops. CET01 is a designation of the town centre. The policy for town centres is set out in PPS5 and other prevailing regional policy. This objection is not sustained.

Land should be Identified as or part of a Development Opportunity Site or a Target Site

- 3.1.115 Objection 264 requests that the whole of **Bridge Street, Circular Road Corner** should be considered in total and should be designated as an opportunity site. The objection site is a corner site at the junction of Bridge Street with Circular Road opposite Bishop Gate Shopping Centre fronting towards the river. The site is adjacent to opportunity site CET05 which appears to be split in two by the objection site. KSR 2 of this zoning specifically states that *'any development shall incorporate retail units fronting Bridge Street to enhance the functioning of this key town centre link'*. The inclusion of the objection site would be logical in the comprehensive redevelopment of this prominent corner town centre site and we recommend that it be so included.
- 3.1.116 Objection 5597 was to the failure of the Plan to identify target and development opportunity sites in proximity to the bus and rail station, with the aim of facilitating the integration of transportation with land use. However, the objector did not identify any specific sites to substantiate or justify the identification of further such opportunity sites. Accordingly the objection is not sustained.
- 3.1.117 Objection 5762 seeks the identification of **Industrial Zoning CEI16 Riverside Business Park** as a Development Opportunity Site. Retail development is now built on this site. There was no persuasive need to identify this in the Plan as an opportunity site. Accordingly the objection is not sustained.

Zonings CET02 – CET07 Development Opportunity Sites

- 3.1.118 Objection 313 relates to **Zoning CET02 Abbey Street Car Park** on the basis of the potential visual impact of high rise development and the loss of free car parking for the town centre Churches on Sunday mornings. The visual assessment is a matter to be considered through the development management process. The Department confirmed that Planning permission has been granted in July 2008 on the site under C/2008/0009/F for Abbey Street Car Park. Objection 4348 to this zoning was on the basis that Sunday worshippers would have to pay for parking and that the redevelopment of the site could lead to traffic congestion. The issue of free parking for the town centre Churches is a private matter between the car park provider and the user. No persuasive evidence was presented to demonstrate the extent that that redevelopment will result in significant traffic congestion. Accordingly we recommend no change to the Plan following consideration of these objections.
- 3.1.119 Objection 331 & 4406 were made to **Zonings CET02 Abbey Street Car Park, CET03 The Mall Car Park, CET06 The Harbour Estate and CET07 Castle Lane** on the basis of the loss of surface level town centre car parking. With exception to CET06, the other zonings KSR 3 require that any development should incorporate the provision of the current number of car parking spaces, together with an additional level provision to be agreed. CET06 does not fall within the town centre and does not provide car parking

for this area at present. Objection 4525 was made to these zonings on the basis that the redevelopment of these sites will result in an increase in parking fees and thereby deterring shoppers from the town centre. As noted already the pricing for parking is a private matter and there is no evidence to substantiate how redevelopment of these sites would deter shoppers for this reason. Objection 5597 to these zonings was on the basis that the KSR omitted reference to the Council's forthcoming development brief for these sites. The objection requests that the Plan is updated to reflect the regeneration initiatives that are underway. The Department confirmed that Planning permission has already been granted on these sites which would significantly contribute to the regeneration of these areas, account would have been taken of the all material considerations during the assessment of the development proposals. Accordingly none of these objections warrant a change to the above proposed town centre zonings.

- 3.1.120 Objection 5674 to **Zonings CET02 Abbey Street and CET03 The Mall Car Park**, was made on the basis that car parking would not be in existence prior to the operation of the redeveloped facility. This is a matter of detail that should be considered through a planning application. Accordingly this objection is not justified.
- 3.1.121 Objection 4794 to **Zoning CET03 The Mall Car Park** on the basis that an addition KSR should be added to support links to the Harbour land to improve commercial viability. CET03 is physically separated from CET06 The Harbour Estate by a large area of open space including playing field and recreational land. We are not persuaded by the objection to merge these two sites would benefit the future viability of these two opportunity sites given their different function and character. This objection is not sustained. Objection 4886 to this proposed zoning on the basis of the restrictive, unclear and unnecessary KSR relating to the site. The Department confirmed that planning permission (C/2007/1154/F) has been granted on this site in August 2009. This objection is therefore not sustained as a development proposal has come forward and has been approved on the site.
- 3.1.122 Objection 331 to **Zoning CET04 Market Yard** on the basis that redevelopment of the site as an entertainment/cultural complex use would be inappropriate. Paragraph 8.3.1 of Plan supporting this designation states that site would be suited to redevelopment as an entertainment/cultural complex. The objector provided no evidence to explain or justify why such a use would be inappropriate at this location. Accordingly this objection is not sustained.
- 3.1.123 Objection 331 to KSR2 of **Zoning CET05 Bridge Street - Circular Road and Zoning CET06 The Harbour Estate** on the basis that residential use would not be a suitable use. The KSR allows for mixed uses and in these locations we do not find an element of residential use to be inappropriate or unacceptable. These objections are not sustained.
- 3.1.124 Objections 4667 and 5757 to **Zoning CET05 Bridge Street** on the basis of the failure of the zoning to mention its location within the Coleraine Town Centre ATC and the retention of the buildings as being of paramount importance, particularly those fronting Bridge Street. Map 3/10b sets clearly shows the ATC boundary and therefore there is no need for the zoning to

refer to the ATC, and Designation CET08 ATC Coleraine Town Centre sets out the key features to be taken into account for any redevelopment proposal in this area. We are satisfied that there is no need for this zoning to duplicate the ATC designation or requirements. This objection is not sustained.

- 3.1.125 A further element of Objection 5597 to **CET06 The Harbour Estate** related to the omission of a requirement for the development to incorporate future provision of public access from the Harbour Estate, along the river front to Clonavin Council Offices. This area does not abut Clonavin and there are a number of other land uses in between. We accept that it is difficult to apply this requirement on land that is outside the control of the site's developer. We do not consider it practical to amend the Plan to seek the suggested requirement.
- 3.1.126 Objection 5649 relates to Zoning **CET06 The Harbour Estate** on the basis KSR4 should be amended to state that the 'river frontage should be softened with appropriate planting'. No persuasive evidence was present to justify why the river frontage should be planted. We are satisfied that the wording 'the development will incorporate an appropriate frontage to river', allows flexibility to incorporate planting if felt necessary. This part of the objection is not sustained. A further element of objection 5649 and objection 5733 queried whether it was appropriate to have public access along the entire river. We accept that working docks, ports and marinas may present certain health and safety risks. We therefore agree that the words "*where appropriate*" should be inserted at the beginning of KSR4, and this is a matter to be negotiated with the Harbour Commission.
- 3.1.127 Objection 5597 to **Zoning CET06 The Harbour Estate** requested clarification as to whether this site was within the Town Centre as designated in CET01, especially as the KSR2 indicates that the site would be suitable for retailing among other uses. At the EIP the Department confirmed that the site was outside the town centre but is identified as an opportunity site and that the wording relating to retailing should be removed from KSR2 in CET06. Any development for retailing in this area would then have to be consistent with the requirements of PPS5 for retail development outside of the town centre. We agree with the Department's suggested amendment remove the wording relating to retailing stated in KSR2.
- 3.1.128 Objection 5674 to **Zonings CET06 The Harbour Estate and CET07 Castle Lane** requested that a 5-6 metre buffer zone should be required to create more open space along the river. No evidence was presented to substantiate why this would be necessary. The objection is not sustained.
- 3.1.129 Objections 4667 and 5757 to **Zoning CET07 Castle Lane** on the basis that it does not note the Clothworkers Hotel as a Listed Building within the KSR or the ATC. We are satisfied that KSR 6 covers this issue as it requires that development on this site will complement the adjacent Listed Buildings of the Waterside. Accordingly this objection is not sustained.
- 3.1.130 Objection 4978 is to the restrictive KSRs relating to Zoning **CET07 Castle Lane (Waterside)**. This area includes the Waterside car park, an area of green space to its north, a vacant garage building to its west and the

Clothmakers Building, a listed building, to the south. The site therefore represents an important area at the centre of Coleraine and any development on the site should respect the setting of the river and the surrounding context. The area also provides an important area of public car parking relative to the town centre. At the EIP the objector was concerned specifically with the restrictions presented by KSR5, requiring any development to not exceed the equivalent of a normal three storey in this area. The objector stated that a planning application (C/2011/0177/F) relating to the objection site had been submitted. We note that this was approved on 7th May 2013. The application relates to the refurbishment and conversion of the Clothworkers Building, demolition of the existing rear extension and replacement with a new five storey extension to provide a cafe, restaurant, retailing and offices, leisure and two apartments and basement car parking. The planning application relates to the area between the river and the Clothworkers building. What has been approved presents an acceptable design solution for this part of Zoning CET07. At the EIP the Department shared concerns with the objector regarding the restrictive KSR placed on this zoning. The Department noted that the objection site only related to a small area of the zoning and suggested that the zoning should be divided in two to allow greater flexibility. The objection site would become a new zoning CET07a with the following KSR attached:

1. Development on this site shall be considered in the context of the Clothworkers Building and neighbouring context; and
2. The site is particularly suited to mixed use redevelopment including retail, offices, entertainment, catering and residential.

- 3.1.131 We support the Department's proposed amendment to zoning CET07 Castle Lane.
- 3.1.132 Objection 5710 to **Zoning CET07 Castle Lane** was on the basis that no provision was made for the designation of an Ambulance Active Outpost facility at Waterside/Castle Lane. This objection was not substantiated with evidence to demonstrate that provision for such a facility is required at this particular location. The objection is not sustained.

Recommendations

- 3.1.133 **We recommend that:**
- **The entire Tesco site as approved under planning application C/2005/1253/F is included within Designation CET01 Coleraine Town Centre.**
 - **5-11 Union Street is included within Designation CET01 Coleraine Town Centre.**
 - **Objection site 5597 should be zoned as open space and included within the adjacent LLPA designation CEL25 County Hall in order to address the anomaly in the Plan.**

- **Objection site 264 is included within Zoning CET05 Bridge Street – Circular Road Development Opportunity Site.**
- **Objection site 4978 should be zoned as a separate development opportunity site CET 07a Castle Lane (Waterside Car Park) with the following KSR:**
 - 1. Development shall be considered in the context of the Clothworkers Building and neighbouring context; and**
 - 2. The site is particularly suited to mixed use redevelopment including retail, offices, entertainment, catering and residential.**
- **The Plan clearly notes that CET06 is outside the Town Centre boundary and that the word ‘retail’ should be deleted from KSR2.**
- **KSR4 of Zoning CET06 The Harbour Estate, has the words “*Where appropriate*” inserted at the beginning.**

AREA OF TOWNSCAPE CHARACTER (ATC)

- 3.1.134 Designation CET08 Area of Townscape Character Coleraine Town Centre is shown on Map 3/01a & Map 3/01b. The Plan identified twenty key features of this area to be taken into account when assessing any development proposal in this area.
- 3.1.135 The objections to the ATC raised the following issues:
- a) The key features are over prescriptive and are too restrictive;
 - b) Failure to identify Lodge Road as an ATC;
 - c) Failure to identify Mountsandel Road as an ATC; and
 - d) The Bann Corridor should be protected from apartment development.

The Key Features are over Prescriptive and are too Restrictive

- 3.1.136 Objections 331& 4830 were to what was perceived as the over prescriptive and restrictive nature of Designation CET08 ATC Coleraine Town Centre. The ATC covers a large area where variations in character, design and scale exist. However, neither objection was substantiated with further evidence to suggest how the wording of Designation CET08 could be amended or to justify its removal from the Plan. We are satisfied that designation CET08 should remain in place.

Failure to Identify Lodge Road as an ATC

- 3.1.137 At the EIP the Department accepted that there was merit in the argument presented by Objector 5597 that the distinctive character of **Lodge Road**, from its junction with Railway Road within the town centre to the Lodge Road roundabout, merited it being designated as an ATC. A map was provided by the Department to show the proposed ATC area. It was agreed at the EIP that the map and supporting text would also relate to the area to the rear of

terrace of properties to the northeast of the Lodge Road and exclude land at Lodge Manor. The Lodge Road is a mixed use area, including commercial premises, public buildings, school premises and private dwellings. Along the road there are areas of distinctive character such as the Victorian three storey terraces which display strong vertical emphasis and the large detached properties. It is also a key transport corridor into and out of the town centre. We accept that the area does merit being designated as an ATC in accordance with the map submitted by the Department and that this area should be designated as Designation CET09. The Department also submitted supporting text identifying the key features of this area. We agree that these accurately reflect the important features that should be taken into account for any development proposal in this area.

Failure to identify Mountsandel Road as an ATC

- 3.1.138 Objection 5597 sought the designation of eastern side of **Mountsandel Road** (between Terrace Row Presbyterian Church and the proposed zoning CELC08 at Glengorm Avenue) as an ATC. At the EIP the Department stated that, given its length, Mountsandel Road did not display the necessary character for a blanket ATC designation. The Department did however acknowledge that there was a stronger argument for designating the properties that make up Ardbana Terrace. Whilst we recognise the attractive and uniform appearance of this terrace, we are not persuaded that it merits an ATC designation. We are satisfied that adequate protection is provided for it by prevailing regional policy. We conclude Mountsandel Road does not merit an ATC designation.

The Lodge Road, Mountsandel Road and the Bann Corridor should be protected from Apartment Development

- 3.1.139 Objection 5597 sought that these areas should be protected from apartment development. Apartment development is already evident in these areas. No evidence was presented to substantiate the alleged harm that such development causes to these areas. This objection is not sustained.

Recommendations

- 3.1.140 **We recommend that:**

- **Lodge Road is designated as ATC Designation CET09 Lodge Road and in accordance with the Department's submitted map and supporting text to be inserted into the Plan:-**

AREA OF TOWNSCAPE CHARACTER – CET09 LODGE ROAD

Lodge Road is a mixed use area, containing commercial premises, public buildings, school premises and private dwellings. It contains three storey terraces including Listed Buildings, semi detached and detached dwellings and 2 storey dwelling built in the 20th Century. Whilst the area is mixed, there are a number of strong characteristics in terms of the generally standard building line, and the presence of mature vegetation along the street

frontage. The area at the front of the High School lies within LLPA CEL07. Whilst the buildings span a long period, including recent new buildings, generally, these present an attractive street frontage and, within each type, there is some regularity in built form, for example the Victorian three storey terraces, and detached villas display strong vertical emphasis, and detached and semi detached dwellings are mainly two storey in height and often symmetrical in their front elevation. The prevailing character of the area, whilst on an aerial road, is that of a pleasant and distinct area which has a sense of local identity, not least due to the generous front and rear garden areas for many of dwellings along the road.

Policy for the control of development within Areas of Townscape and Village Character are contained in Policy ENV6 in Part 2, Volume 1 of the Plan.

Designations CET09

An Area of Townscape Character is designated and identified on Map No 3/01a – Lodge Road Area of Townscape Character.

Key features of the area that will be taken into account when assessing development proposals are as follow:

1. The uniformity of the building line with properties set back from the street frontage;
2. The presence of mature vegetation along the street frontage;
3. The regularity in built form within each building era, including vertical emphasis in design in older properties and symmetry in design in post Victorian properties; and
4. Special attention will be given to the Listed Buildings and their settings.

RETAILING, SERVICES, OFFICES, COMMERCIAL CENTRES, EDUCATION & COMMUNITY.

3.1.141 Eight Commercial Designations were identified in the Plan as local centres. These are shown on Map 3/01a. The site specific objections raised the following issues:

- a) Commercial Designations CELC01 – CELC08;
- b) Failure to designate Riverside Regional Park as a District Centre;
- c) The location of the convenience retail floor space and provision of adequate and servicing and car parking for different retail formats;
- d) Land at Ballyrashane Road to accommodate the provision of education; health, community and cultural facilities; and
- e) Land at Coleraine East for mixed used development.

Commercial Designations CEL01 – CEL08

- 3.1.142 Objection 331 to Commercial Designations **CEL01 Ballysally Local Centre, CEL02 Greenmount Local Centre, CEL03 Harpers Hill, CEL04 Hazelbank Road Local Centre, CEL07 Millburn Local Centre & CEL08 Knocklynn Local Centre** were made on the basis of commercial purposes, but were not substantiated with any reasoning.

Failure to Designate Riverside Regional Park as a District Centre

- 3.1.143 Objection 4406 was made on the basis that the Plan failed to provide policy for Riverside Regional Park and that it should be designed as a District Centre. The retail strategy of the Plan is set out in Section 1 of our report. Where we have already concluded that Riverside should not be designated as a District Centre in order to protect the viability and vitality of Coleraine Town Centre. No further evidence was presented at site specific stage to persuade us to change our recommendation on this matter.

The Location of Convenience Retail Floor Space and Provision of adequate Servicing and Car Parking for different Retail Formats

- 3.1.144 Objection 4660 seeks that the retail section (Section 9) of the Plan includes a recommendation that of the identified 6,985 sq metres of capacity for convenience retail floor space, that at least 1,500 sq metres could be accommodated at the Asda Store. The **Asda Store is located off the Ring Road** and is situated approximately 1 km in a south east direction from the proposed town centre boundary. In the Department's letter dated 18 July 2011 they withdrew the strategic retail policies RS01, RS02 and RS03 from the Plan on the basis that further retail development will be considered under PPS5 which is currently under review. Despite the strong retail offer noted in the Draft Coleraine Masterplan 2011, we note there are a number of Commercial Opportunity Sites within and adjacent to the proposed town centre. The Department has updated their position since that presented in the retail technical supplement now stating that it is not anticipated that there will be additional spare capacity for retail development over the Plan period. Should the Asda Store wish to seek an expansion of retail floor space, then the appropriate mechanism to do this is through a planning application where the retail impact can be fully assessed. We do not agree that the Plan should specifically state where convenience retail floor space should be located. This objection is not supported.
- 3.1.145 A further issue sought by objection 4660 was that the Plan should make clear recognition that certain retail formats, notably superstores and retail warehousing, require to be served by adequate car parking and servicing facilities to ensure qualitative objectives in national guidance are met. Issues relating to the adequate and necessary servicing and car parking for retail development are also a matter to be assessed through a Planning application within the context of Regional Planning Policy applicable to the development. This objection is not sustained.

Land at Ballyrashane Road to Accommodate the Provision of Education, Health, Community and Cultural Facilities

- 3.1.146 Objection 4863 seeks that the subject site at **Ballyclabber, Ballyrashane Road** is zoned and made available for educational facilities. The submitted evidence sought the land to be made Health, Community and Cultural Facilities. However, we can only consider the issues raised by the original objection which only referred to educational facilities. Whilst, the site is adjacent to a group of buildings, neither the site nor these buildings are physically linked to the urban form and would not present a logical extension to the SDL at this location. The submitted evidence did not substantiate any need for such uses at this location but appeared to be made on a speculative basis. If a need were to arise this for such uses then this would be a material consideration for any development proposal on this land. The inclusion of this site would not result in retaining a compact urban form at this location. Accordingly, we do not recommend any changes to the Plan following the consideration of this objection.

Land at Coleraine East for Mixed Use Development

- 3.1.146 Objection 5755 seeks the expansion of the SDL to the east for mixed use. We have previously concluded that inclusion of this land for industrial purposes would not create a compact urban form but would result in urban sprawl. We are no more persuaded that it should be incorporated within the limits for mixed uses. This objection is not sustained.

TRANSPORTATION AND CAR PARKING

- 3.1.148 Section 10 of the Plan sets out the ‘Transportation Strategy’ and Section 11 sets out the ‘Parking Strategy’ for Coleraine. The main issues to transportation and parking relate to:
- a) Further analysis is needed in relation to transportation;
 - b) Car parking sites; and
 - c) Need for integration of land use and transportation.

Further analysis is needed in relation to Transportation

- 3.1.149 Objection 4794 relates to Part 5, Paragraph 10.5, Page 99 of Volume 2 stating that the proposed changes to **Lodge Road and Railway Road** need further analysis to the effect of these changes on local servicing and parking. The objection did not substantiate the level of the further analysis that would be required. Nonetheless the Plan also clearly states in paragraph 10.5 that the following changes “will be subject to further study”. This objection does not warrant any change to the Plan. A further element of this objection requested that paragraph 10.6 of Volume 2 Part 5 needs to be flexible to accommodate the development at **Abbey Street and The Mall** car park sites and any other development during the Plan period. The transportation impacts of all development during the Plan period are a material consideration that would require detailed assessment during the determination of a development proposal. It is not the role of the development Plan to be over prescriptive in relation to this issue. We are

satisfied that the Plan allows sufficient flexibility for any new development during the Plan period. The objections are not sustained.

- 3.1.150 Objection 5597 was to the limited nature of the road proposals and requests that a more comprehensive traffic management review be undertaken, including consideration of the following: Traffic management in the town centre, development around the bus and rail terminal, new route from ring road to town centre & a third bridge over the River Bann. The Plan has stated that the measures set out in the Plan will be subject to further study. This objection was not substantiated with evidence to demonstrate a comprehensive need or how such initiatives could be implemented within the town. The objection does not warrant any change to the Plan.
- 3.1.151 Objection 5674 was made on the basis of the failure of the Plan to identify problems and indeed, causes of traffic conflict throughout the town. The problems highlighted by the objector related to the Railway gates at **Bushmills Road, Beresford and Old Town Bridge** and that these problems could be addressed by Planning a new road from the Ring Road, through CEI10, across the railway to CEH42 and either into the existing car park at the rear of the leisure centre or existing car park at the station. This objection was not fully substantiated with drawings to show the exact road line or a comprehensive transport assessment to demonstrate the need and benefits of such a road layout on the existing transportation infrastructure for Coleraine. Without this evidence to full demonstrate these changes we cannot make a recommendation on the necessity to bring such a new road line through in this Plan. A further element of this objection was that the measures set out in points a, b and c of paragraph 10.5 Part 10 Volume 2 of the Plan fail to allow the town growth commercially, again this claim has not been substantiated with any persuasive evidence to warrant any change to the Plan. These objections are not sustained.

Car Parking Sites

- 3.1.152 Objection 4525 relates to the failure of the Plan to provide sufficient parking for Coleraine on the basis of the overall Development Strategy promoting more growth including for housing which in turn creates more pressure for parking in Coleraine. The lack of parking facilities will deter people from using the town and the Plan acknowledges a short fall in parking at Paragraph 11.4, page 101, Volume 2. The Department has confirmed that since the publication of the Plan that developments have been approved at The Mall and Abbey Street sites that will provide a minimum of 675 and 534 car parking spaces in the town centre. These sites if developed will help address any shortfall of parking provision. The objector did not present any substantive analysis to contradict the Departments more recent updated position. As the shortfall of car parking can be met through potential future development this objection is not sustained, however we would recommend that paragraph 11.4, Page 101, of Volume 2 is amended to reflect the Department's updated position regarding parking provision.
- 3.1.153 Objection 5597 requests clarification of the reference contained within paragraph 11.2, Part 11, Volume 2 relating to the possible introduction of on

street charging. This is not a specific Plan proposal and does not therefore require further clarification in the Plan.

- 3.1.154 Objection 5673 stated that any increase in the restriction times and areas will be counterproductive, that the Plan fails to make provision for commuter car parking. This is not a specific Plan proposal and does not therefore require further clarification in the Plan.

Need for Integration of Land Use and Transportation

- 3.1.155 Objection 5734 was to the omission of reference to the Port of Coleraine and its significance for transportation in the area. It was also pointed out that the River Bann is navigable from sea to Coleraine and beyond should be recognised by the Plan. The objector did not provide any evidence to explain fully the importance of the port in terms of transportation. However, the Port and River Bann are integral to the town and this should be recognised in the supporting text in Section 10, Volume 2 of the Plan.

Recommendations

- 3.1.156 **We recommend that:**

- **Paragraph 11.4 of Volume 2 Page 101 is amended to reflect the Departments updated position regarding parking supply in Coleraine.**
- **The existence of Coleraine Harbour and River Bann should be recognised in the Transportation Section (Section 10) of the Plan.**

LOCAL LANDSCAPE POLICY AREAS (LLPA)

- 3.1.157 The Plan designates 26 LLPA within and around the edge of Coleraine. Within each designation the Plan identifies the key features which the designation seeks to respect. Proposals for development in these areas will be considered within Policy ENV2 in Volume 1 of the Plan. The main issues raised by the site specific objections include:

- a) Removal or part removal of LLPA designation; and
- b) Failure to designate a LLPA in the Plan.

Removal or part removal of the LLPA Designation

- 3.1.158 Objection 331 to any new policy designations at land at **Ballysally House, Somerset Forest and the Ballycairn Area**, were not substantiated or explained.
- 3.1.159 Objection 331 to **CEL01 Ballysally Burn LLPA & CEL02 Dundooan House** was made on the basis of their location to the northern side of the town. No evidence was presented to substantiate these objections.

- 3.1.160 Objection 5763 was made to **CEL02 Dundooan House LLPA, CEL06 Ballyarton LLPA & CEL24 Slieve Banna LLPA**. No evidence was presented to substantiate these objections.
- 3.1.161 Objections 336 to **CEL02 Dundooan House LLPA** on the basis that the any development on this land would have to already respect the setting of the listed building at Ballysally House (aka Glenfield House) and therefore the LLPA designation is not required. Objection 5144 also questioned the justification of this designation because the land is covered by planning policy applicable to the countryside. The Department is satisfied that this designation meets the requirements for an LLPA designation especially because of the importance and setting of the listed building. The objection presented no persuasive evidence to demonstrate that this LLPA should not be designated. This objection is not sustained.
- 3.1.162 Objections 331 to **CEL03 Shell Hill & Hermon Lodge LLPA & CEL04 University LLPA** were made on the basis of its location in Coleraine and are areas of open space. No evidence was presented to substantiate this objection.
- 3.1.163 Objection 331 to **CEL05 Barview LLPA, CEL06 Ballyarton LLPA, CEL10 Overfields LLPA, CEL12 Knocktarna LLPA, CEL13 Knockantern LLPA, CEL14 Castleroe Forest, CEL15 Mountsandel Woods, CEL18 The Cutts LLPA, CEL19 Somerset Woods, CEL23 Ballycairn Motte LLPA & CEL24 Slieve Banna LLPA** on the basis that these LLPA's all fall outside the SDL and therefore sufficient protection is afforded to these areas. No evidence was presented to substantiate these objections.
- 3.1.164 Objection 4836 to **CEL06 Ballyarton LLPA** on the basis that this designation seeks to preclude development of these lands and therefore it should be removed. This LLPA falls outside the SDL and recognises the key features of the landscape in this area which contribute to the setting of the settlement. The objector presented no evidence to substantiate why this area should not be designated as an LLPA. This objection is not sustained.
- 3.1.165 Objection 331 to **CEL07 The Brook LLPA, CEL08 St Malachy's Church LLPA, CEL09 Mc Master's LLPA, CEL18 The Cutts LLPA, CEL21 Loreto College LLPA, CEL25 County Hall LLPA & CEL26 Breezemount LLPA** were made without any explanation or reason.
- 3.1.166 Objection 5649 to Designation **CEL07 The Brook LLPA** was made on the basis that no development should be permitted in this LLPA because of its impact on the wetland corridor and wooded slopes. Much of this site is covered by an area of designated open space, which would limit opportunities for development. The objection did not present persuasive evidence on why 'no' development should be permitted in this area or how the designation could be amended to further restrict development in this area. The objection is not sustained.
- 3.1.167 Objection 4855 to **CEL10 Overfields LLPA** on the basis that this is a commercial planting to the south-eastern gateway to the town and therefore should be removed. The designation includes areas of local conservation

interest including a conifer plantation with a deciduous edge planted around Overfield Poultry farm. The objection did not present any evidence to substantiate why this area should not be designated on the edge of Coleraine as an LLPA. Accordingly the objection is not sustained.

- 3.1.168 Objection 331 to **CEL11 Causeway Hospital LLPA** was made on the grounds that it was within the hospital grounds. No evidence was presented to substantiate why this LLPA should not be designated.
- 3.1.169 Objection 5590 seeks the part removal of land from **Designation CEL13 Knockantern LLPA** at 155 Mountsandel Road. This site has been partly developed with a new dwelling. However as no evidence was presented to substantiate why it should be removed from the LLPA, we do not consider there should be any change to the plan following consideration of this objection. Objection 5220 seeks the removal of land at 169 Mountsandel Road from this designation. The objection site comprises a new dwelling. The Department have accepted that this development does not impact on the key features of this LLPA. The objector did not substantiate this objection with a reason to remove the site from the LLPA. This objection is not sustained and the site should remain within the LLPA.
- 3.1.170 Objection 5649 to Designations **CEL14 Castleroe Forest and Bann Banks LLPA and CEL15 Mountsandel** on the basis that no development should be permitted in these areas. No substantive explanation was given. Accordingly the objections are not sustained.
- 3.1.171 Objection 331 to **CEL16 River Bann and Banks LLPA, CEL17 Laurel Hill LPPA & CEL20 Coleraine College** relate to these LLPA designations overlapping housing zonings. No evidence was presented to substantiate these objections. The LLPA designation does not necessarily restrict housing development on these sites. No evidence was presented to substantiate these objections.
- 3.1.172 Objection 4406 to **CEL16 River Bann and Banks LLPA** on the basis that this area is not suitable for an LLPA and is should be removed. This LLPA relates to the Bann river corridor between the Bann Bridge and Sandelford Bridge, extending along the eastern side to include properties 25-35 Mountsandel Road. The river corridor is a feature of high landscape and visual amenity value and contributes to the landscape character and setting of the town. We are satisfied that the different features of the LLPA meet the requirements of an LLPA designation. The objection presented no evidence to substantiate why this area was not suitable for a LLPA designation and therefore it is not sustained.
- 3.1.173 Objection 4866 to **CEL16 River Bann and Banks LLPA** on the basis that **1 Mountsandel Road**, makes no meaningful, visual or otherwise contribution to this LLPA as it is largely screened by other built form. The objection site relates to the 'Egg Store' which fronts onto Mountsandel Road. The Department notes that the property is contained on the ridgeline above the river, along with a number of properties along the Mountsandel Road, and therefore its inclusion is consistent with the other properties. When viewed from across the river the ridge of development provides an important edge to this LLPA and the property at 1 Mountsandel Road contributes to this ridge

and should therefore be retained within the LLPA. The objection is not sustained.

- 3.1.174 Objection 264 seeks that land within **CEL18 The Cutts LLPA** is zoned for housing. No evidence was presented to substantiate an objection to the LLPA. Objection 5192 was to this designation and its associated restrictions. However no evidence was presented to substantiate the objection.
- 3.1.175 Objection 5502 seeks the removal of the site from Designation **CEL19 Somerset Woods LLPA**. The objector accepted the environmental merits of the site and accepted the recognition of the key features identified by the LLPA designation. The concern related to the wording of paragraph 12.15 of Vol2 page 108 of the Plan, which would restrict any further development on this land. At the EIP the Department accepted that paragraph 12.15 should be removed from the Plan and that this would not harm the objectives of this LLPA designation. We agree that the removal of this wording in the Plan would be logical, as any development on the land that respects the identified key features would not threaten the landscape quality of this area.
- 3.1.176 Objection 4998 seeks the removal of land from the proposed **CEL21 Coleraine Inst. LLPA** as it overlaps with a housing zoning. The objection does not substantiate why this site should not fall within the designation. Objection 5501 to this designation was on the basis that the school buildings and grounds will be adequately protected through the normal development management process. This LLPA seeks to protect the setting of the refurbished listed building and its setting. The objection was not substantiated with evidence stating why the area does not merit being included within the LLPA. A further element of this objection is that No 23a Queens Park and 2 Ballycairn Road should be excluded from the LLPA. These dwellings are located adjacent to the Coleraine Inst; again the objector provided no evidence to support why they should be removed from the designation. Accordingly the objections are not sustained.
- 3.1.177 Objection 5649 to Designation **CEL23 Ballycairn Motte** sought the change of wording of paragraph 12.10 from 'agricultural development will normally be acceptable' to 'only essential development relating to agriculture will be permitted'. No persuasive explanation was given why this amendment should be made.
- 3.1.178 Objection 4829 to **CEL24 Slieve Banna LLPA** on the basis that the designation is not required and that the important trees could be retained as any part of development on the land. Objection 5047 to this LLPA was not substantiated. The Department considers that due to the diminished landscape and visual nature of these trees that this area no longer merits being designated as an LLPA. We accept the Departments view that this LLPA should be removed from the Plan.
- 3.1.179 Objection 4969 seeks the removal of land at **25-35 Mountsandel Road** from the LLPA. The objector raised the concern regarding mapping issues as it was not clear on Map 3/01a which LLPA the site fell within. At the EIP the Department confirmed that area outside the SDL was within CEL15 Mountsandel Woods LLPA and the area inside the SDL was within CEL16

River Bann and Banks LLPA. The Department presented a map to clarify this anomaly. CEL15 seeks to protect the heavily wooded areas along the River Bank; the lower part of the site is partially wooded and contributes to the key features of the surrounding area in the LLPA. Designation CEL16 seeks to protect the environmental quality, integrity or character of the area of the associated banks of the River Bann. The LLPA designation does not prohibit development in the SDL but requires that it would be sensitive to the setting of the river. The areas of the site in each LLPA are fully consistent with the identified features key features; the evidence presented was not persuasive to warrant the removal of the objection site from the LLPA.

Failure to Designate a LLPA on Land in the Plan

- 3.1.180 Objection 5597 was to the failure to identify land on the **west bank of the River Bann** immediately north of the sewage works, as an LLPA. The objector did not provide a map to indicate the exact location or boundary of this LLPA. Based on the objector's description of where the LLPA should relate to at the EIP the Department indicated that LLPA CEL25 County Hall should be extended to include this area only as far as the edge of the SDL. It also recommended that an additional KSR (KSR3) should be also added to the key features stating "River Banks and Associated Lands". We are not, however persuaded that this area merits the extensions of LLPA CEL25 County Hall as it does not display the landscape quality for such a designation. We do not support the Department's suggested amendment.
- 3.1.181 Objection 5649 also relates to this area as identified in by objection 5597 and to the failure to identify land on the **west bank of the Bann to the east of Cairnvale Park** and the railway line and to the north of the sewage works. Objection 5751 seeks the extension of designation CEL16 northwards along the banks of the Bann to ensure linkages with the open land especially along the eastern bank. The Department accepted that there was some merit in affording protection to the river banks in this area and offered an extension to Designation CEL16 River Bann and Banks LLPA. A map was provided within the Departments evidence (appendix 2). This was supported by Natural Heritage who recognised features and area merits being designated as an LLPA. This area comprises relatively flat land and lacks the strongly defined vegetated banks where other river side LLPA's in Coleraine have been proposed. The area is would have limited development potential given the ground cover and the physical constraints presented by the railway line at this location. We are not persuaded that it merits the extension of the proposed LLPA Designation CEL16 River Bann and Banks LLPA.
- 3.1.182 Objection 5751 also sought the designation of a LLPA linking the **Lodge Road roundabout with the Sandleford Bridge**. No evidence was presented highlighting what key features such an LLPA would serve to protect. The Department considered that this area would not justify an LLPA designation. Accordingly without the benefit of persuasive evidence we cannot sustain this objection.

Recommendations

3.1.183 We recommend that:

- **Designation CEL24 Slieve Banna LLPA is removed from the Plan.**
- **The removal of paragraph 12.15 page 106 Vol2 from the Plan.**

TOURISM

- 3.1.184 The Department's letter dated 18 July 2011 withdrew the tourism policies from the draft Plan. However, some site specific objections were made on that basis that land should be zoned for tourism purposes in Coleraine.
- 3.1.185 Objections 264 & 4914 relate to lands at **Cranagh**. Objection 264 sought the designation of the site for tourist accommodation and water recreational use. The objection was not substantiated with any evidence to justify such a designation in the Plan. Objection 4914 was on the basis that the Plan makes inadequate provision for the development of tourism relating to the tourism potential of the Lower Bann and seeks the inclusion of land at **Cranagh** to be included within the SDL and designated as a recreational/tourist site. The objection site is located off the Portstewart Road adjacent to the Cranagh Fisheries and University Land. The land comprises a marina and small cafe. Planning permission (C/2008/0924/F) was granted in June 2009 for the improvements to the existing marina including new pontoons to extend the marina to facilitate 60 boats and the extension of the existing tea/function room and new parking area. This permission signals that the principle of such development is acceptable at this location, any further expansion of such development should be considered through a planning application where the environmental impact of development can be fully considered. It also demonstrates that such a tourism use does not need to be located within the SDL to benefit from planning permission or requires a specific planning zoning to come for as a development proposal. The inclusion of the land would represent an irregular extension to the SDL. For these reasons we do not accept that the site should be included within the SDL and designated for recreational/tourism use. The objection is not sustained.
- 3.1.186 Objection 5649 sought the amendment of paragraph 2.6 page 70 of Volume 2 where it states "The River Bann corridor is a major asset to the town and this must be protected managed and enhanced when and where possible" to be changed to "The River Bann corridor is a major asset to the town and this must be protected managed and enhanced as a priority". The objector did not explain or substantiate why this amendment to the wording should be made. Without such explanation we do not consider it necessary to alter the wording of paragraph 2.6 of the Plan.

3.2 **GARVAGH**

HOUSING

- 3.2.1 Garvagh has been designated as one of four towns in the Coleraine District. This elevates its position from a village as designated in the NEAP. The SDL for Garvagh, Designated GH01, is identified on Map 3/02.

Plan Provision for Housing

- 3.2.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan make provision for 201 housing units in Garvagh. Between January 1999 and August 2010 some 88 housing units were completed. The Housing Update Figures Paper March 2011 estimated there is a surplus of 126 units (62.7%) remaining in Garvagh and there is no need to expand the SDL. However, the settlements location on the banks of the Agivey River has meant that since the publication of the Plan Rivers Agency has stated that Housing Sites GHH02, GHH03, GHH06 and GHH09 may be subject to flood risk. Such a flood risk would significantly affect the development potential and housing yield on these sites. The Department has recommended that these housing zonings are withdrawn from the Plan and remain as white land within the SDL. We support the withdrawal of these housing sites from the Plan based on the concerns relating to flood risk. The Department has estimated that the loss of these housing zonings will reduce the potential housing yield of the settlement by around 52 units. This evidence was not challenged. This will amount to a reduced surplus of 74 units (37%) above the Plan allocation for Garvagh. Given the sufficient supply of housing land and the length of time to the notional end date of the Plan there is no need to monitor the release of the housing land to prevent a shortage. The SDL is not restrictive and does provide sufficient opportunities to accommodate future growth.

Social Housing

- 3.2.3 There was no social housing need presented for Garvagh.

Settlement Development Limits (SDL)

- 3.2.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Garvagh. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period, even with the removal of the housing zonings in the flood plain. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of our report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify and exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Garvagh. Our assessment of the objections is as follows:

- 3.2.5 Objections 15, 331, 4386, 4454 & 4826 seek the inclusion of land or part of land to the **north of Cliftonville Gardens and south of the Hermitage along Coleraine Road**. The objections also seek that land is zoned or developed for housing. The wider objection site (4826) relates to 3 hectares of land comprising two areas separated by a concrete lane leading from Main Street to a farm yard at The Hermitage. The land north of the lane shares road frontage with Coleraine Road and is characterised by flat land with intermittent tall mature trees that contribute to the setting of the farm group and the edge of the settlement at this location. Irrespective of the site location centrally to the settlement, the availability of infrastructure, the existing surrounding development, its ability to accommodate a mix of private and social housing and its inclusion within the SDL of the NEAP, the sites appearance and setting make a significant contribution to the character of the settlement and provide an edge to soften the impact of the settlement when leaving the central area of Garvagh. Even though the trees could be accommodated within any development proposal, the visual amenity and openness provided by this land and trees when viewed from the Main Street and Coleraine Road would be lost through the development of the site. We therefore support the exclusion of this portion of land from the SDL. The land located to the south and south east comprises sloping land sharing a boundary with the rear of the properties at Cliftonville Gardens. Objections 15, 331, 4454 specifically relate to this smaller portion of land to the south and south east of the lane. This portion of land if included would give rise to a compact form of development rounding off the settlement at this location, but given the lack of strategic need for more housing for Garvagh we accept that it should remain outside the SDL.
- 3.2.6 On land **South of Killyvally Road** objection 331 relates to three large fields. These fields are opposite TBF Engineering works. The land would sit within the urban form, but would represent a significant expansion at this location of the settlement. Objection 4444 seeks the inclusion of land **south of Killyvally Road down to the north of Kilrea Road**. The objection site relates to five fields and overlaps the three fields south of Killyvally Road referred to by objection 331. The objector stated that there was a need for the development of this area but this was not substantiated with any persuasive evidence. The inclusion of land of this size and scale would significantly expand the settlement to the east and would give rise to further linear development to the north side of the Kilrea Road.
- 3.2.7 Objection 331 seeks the inclusion of land around **“The Manse” along Station Road**. This land is located within the proposed designation GHL02 Twenty Acres LLPA. The objection site whilst located opposite existing housing within the proposed SDL is not physically adjacent to the SDL along the east side of Station Road. The inclusion of this objection site would result in a gap in development surrounding 21 Station Road failing to result in a compact urban form at edge of the settlement at this location.
- 3.2.8 Objection 331 seeks the inclusion of one large field **south of Rectory Park**. The land fronts onto the Coleraine Road. It is bounded by housing development at Rectory Park to the north and Garvagh Primary School to the south. The inclusion of this land for development would result in a compact form of development at this location within the settlement. Nonetheless the

over provision of housing land in Garvagh does not justify its inclusion within the SDL.

- 3.2.9 Objections 331 and 5000 seek the inclusion of land at the **Chapel Field adjacent to the Police Barracks along Limavady Road** within the SDL on the basis of housing need. This land relates to a triangular portion of land and is bounded to the north and south by development. The land slopes up towards the north west where the site's north west boundary is defined by tall mature trees and would provide a solid edge to the SDL. The inclusion of this land for development would result in the creation of a compact urban form along the Limavady Road. However, without a substantiated need for additional land for housing there is no justification to amend the SDL to include this land.
- 3.2.10 Objection 331 seeks the inclusion of land to the **north of Killyvally Park** within the SDL on the basis of a housing need. Killyvally Park is a small housing development to the east edge of the SDL. This area of land goes beyond the natural edge of the SDL and development on this land would result in further expansion of SDL to the east.
- 3.2.11 Objections 331 and 5157 seek the inclusion of one small field north of **49 Rectory Park along Coleraine Road**. Objection 331 stated that the site should be included on the basis of a housing need whereas objection 5157 argued for the inclusion of the site in terms of urban form. This is a small site surrounded by development to the south and east and by the Coleraine Road to the west. Its inclusion would represent a rounding off of the SDL. Development on this site would sit within the context of the SDL without any detrimental impact to the setting of the settlement, although this land is within the Odour Consultation Zone. However, the over provision of housing means there is no justification to amend the SDL to include this land.
- 3.2.12 Objection 331 seeks the inclusion of land **behind 17 Coleraine Road** within the SDL on the basis of housing need for the settlement. This small site is adjacent to the River Agivey, but only a small area at the eastern edge of the site is within the rivers flood plain. The land is dominated by a belt of mature trees which have been recognised as part of the proposed Designation GHL02 Twenty Acres LLPA. These trees are important to the setting of the settlement at this location and for this reason should be kept outside the SDL. The land is a vital element within the proposed LLPA designation and should remain outside the SDL.
- 3.2.13 On land **north of Kinard Park and South of the playing fields** objection 331 seeks the inclusion of one field. The land is bounded by playing fields to the north and the Jim Watts Sports Centre to the South. It is therefore in the centre of recreational land. It would not be appropriate to amend the SDL to include this land for housing at this location.
- 3.2.14 Objection 331 seeks the inclusion of an extensive area of land to the **north of TBF Thompsons Engineering Works**, comprising approximately 6 fields, that fall within the proposed designation GHL02 Twenty Acres LLPA. The inclusion of this area of land would result in a large extension of the SDL to the east side of the settlement. Such an extension would be out of scale with

the size of the settlement. The inclusion of this land would give rise to urban sprawl in this area. It would therefore be inappropriate to include this land within the SDL.

- 3.2.15 Objection 331 seeks the inclusion of three large fields to the **north of Rectory Park**. The inclusion of these three fields would result in a large linear extension to the north side of the settlement. Such an extension to the SDL would be out of scale and size with the settlement and would give rise to urban sprawl at this location.
- 3.2.16 Objections 4386, 5597 and 4386 relate to land adjoining **GHH010 rear of 24 and 30 Coleraine Road, land to the south of Mettican Road and to the north west of the Presbyterian Church**; objection 5597 only referred to the last two areas. No maps or evidence was provided to substantiate why these objection sites should specifically be included within the SDL. The inclusion of land in this area would further extend the settlement to the north following the existing linear form of development at this location. Their inclusion would not give rise to a compact urban form at this location. We do not consider this objection warrants any changes to the SDL.
- 3.2.17 Objection 4520 seeks the inclusion of a large portion of land to the **east of Rectory Park**. The objector stated that the development at Rectory Park was designed to facilitate another phase of development, given an existing access road and provision of a hammer head were already in place. The land is now within the proposed LLPA designation GHL02 Twenty Acres, which notes the importance of the large mature trees in this area. These mature trees within and along the boundaries of the site would present a major constraint to development. Notwithstanding the trees would provide a tranquil setting for individual houses in this area they are also important for the overall setting of the settlement. Likewise the sites location partially within the flood plain of the Agivey River presents a further constraint for development on the site. The shape of the objection site does not follow the edge of the proposed SDL and if included within the SDL would give rise to a gap in the settlement between the site and the objection site. For these reasons that this land should remains outside the SDL for Garvagh.
- 3.2.18 Objections 4543, 5296 and 5572 seek the inclusion of land **south of Mettican Road** within the SDL for residential use. Objection site 4543 relates to four flat fields running south from Mettican Road along the rear of the properties along Coleraine Road. Objection site 5296 includes the above site and does run along the edge of the proposed SDL and Objection site 5572 overlaps objection site 5296 and seeks that the SDL is brought out in line with the outer edge of the SDL as defined to the north by Glebeview Park. The boundary of the objection site 4543 does not sit neatly with the edge of the proposed SDL and if it were included it would result in an illogical gap at the edge of the settlement. Objection site 5572 relates to an extensive area of land amounting to some 6.9 hectares. Objection 5296 is not significantly smaller than this site. Notwithstanding the flat topography of this area, the provision of services and the road network available for this land, physically the inclusion of this area of land would significantly alter the existing linear urban form of the settlement at this location, even in relation to the smaller objection sites. The inclusion of this land would significantly

expand the width of the northern area of the settlement, which is not in keeping with the existing form and character of the settlement at this location. We do not consider that the SDL should be amended to include this land.

- 3.2.19 Objection 4616 seeks a modest expansion of the SDL to include land adjacent to **St Patricks Primary School, Churchtown Road**, to meet the housing requirements for the settlement. Garvagh Forest provides a mature wooded back drop to the site. The site is bounded by the Agivey River around the north and north west, the Primary School to the east and the Churchtown Road to the south. Almost 50% of the site is within the flood plain for the Agivey River therefore the high density concept drawn for this site as shown by the objector would not be feasible on the site. The boundary of GHH01 has been drawn to reflect the physical constraint provided by the line of the Agivey River. Notwithstanding the access and service provision available for any development on this land, the site and the Primary School are not physically linked to the line of the proposed SDL. The inclusion of this land without the intermittent land between the site and the edge of the SDL would result in an illogical edge to this part of the SDL. The intermittent land is not the subject of any objection. The objector did not provide any persuasive evidence to substantiate their claims in relation to the political geography of the town to justify a need to further breach the south boundary of the settlement. For these reasons we do not consider that the objection site should be included within the SDL.
- 3.2.20 Objection 4689 seeks the inclusion of a small rectangular field located behind **10 Ballynameen Avenue**. With exception to a small pocket of residential and commercial development along the south side of Ballynameen Avenue, this road substantially defines the southern edge of the SDL. The objection site is immediately behind existing road side development and would further expand the SDL beyond the definitive edge provided by the Ballynameen Road. The inclusion of this site would result in unnecessary urban sprawl to the south of the settlement. Accordingly we consider it should remain outside the SDL.
- 3.2.21 Objection 4724 seeks the inclusion of a massive portion of land comprising four large fields at the **junction of Ballynameen Avenue and Carhill Road** within the SDL to meet an increased housing allocation for the settlement. The inclusion of land of this scale would represent a significant expansion to the southern side of the settlement beyond the existing physical boundary which is mainly defined by the Ballynameen Road at this location. The land rises up from the level of Ballynameen Road and if developed would give rise to a prominent form of large scale development viewed when exiting the settlement. The objector did not provide any evidence to substantiate why such a large expansion to the settlement would be appropriate within the urban form of the settlement at this location. We would not recommend the sites inclusion within the SDL for Garvagh.
- 3.2.22 Objection 4966 seeks the inclusion of land to the **rear of 37 Kilrea Road**. This land is located to the south east off Garvagh and sits behind road side development along the Kilrea Road. The Department have accepted that the land is relatively unaffected by any environmental or physical constraint. However its inclusion within the SDL would result in further urban sprawl at

the edge of the settlement and would not result in the creation of a compact urban form. Accordingly we consider it is appropriate that this land remains outside the SDL.

- 3.2.23 On land between **41 and 49 Kilrea Road** objection 4967 seeks the inclusion of some 2 hectares. The land fronts Kilrea Road. Despite the convenience of the site to the town and the provision of a good access to the road, if developed the inclusion of this land within the SDL land would represent a large linear expansion of the settlement along the Kilrea Road. Its inclusion would not give rise to a compact form of development to the edge of the settlement.
- 3.2.24 Objection 5111 seeks the inclusion of lands between **Killyvally Road and Station Road** for housing. At the EIP the objector provided a reduced objection site (appendix 2 of objectors submission) relating to land immediately north of TBF Thompson Engineering Works. The revised objection site relates to some 2.14 hectares and is occupied by one detached dwelling. The house is already within the SDL. The remainder of the objection site outside the proposed SDL relates to one field to the east boundary of this property and is mainly screened by the adjacent Engineering Works. Irrespective of the low level of complaints in the area, the location of housing land adjacent to the Engineering works could give rise to concerns of noise and other associated nuisance for residential development at this location beside an engineering works. Whilst the site would sit neatly with the adjacent urban form, the potential conflict with the existing factory means this land should remain as white land within the SDL and the remainder of the site should stay outside the SDL.
- 3.2.25 Objection 5527 seeks the inclusion of an extensive area of land to the south east of the settlement at **Fort Road and Kilrea Road**. The inclusion of an area of some 13.6 hectares of land within the SDL would significantly increase the scale and size of the settlement. This would have significant implications for the provision of housing in Garvagh. No evidence was presented to substantiate the inclusion of an area of land of this scale within the SDL. Accordingly we would not recommend the inclusion of this land within the SDL.
- 3.2.26 Objection 5771 seeks the inclusion of land at **64 Coleraine Road** within the SDL. The high density development at Glebeview Park provides a definitive edge to the north side of the settlement. The inclusion of this land would further extend the settlement in a linear form to the north and would give rise to further urban sprawl along the Coleraine Road. The objector did not provide any evidence to substantiate why the settlement should be extended further at this location.

Recommendations

3.2.27 We recommend that:

- **Housing Zonings GHH02, GHH03, GHH06 and GHH09 are withdrawn from the Plan and should remain as white land within the SDL.**

HOUSING ZONINGS

3.2.28 The main issues raised by the objections include:

- (a) Housing Zonings should be removed from the Plan; and
- (b) The KSR should be amended or deleted

Housing Zoning should be removed from the Plan

3.2.29 Objection 4616 is made to housing zonings **GHH01 Carhill Road** on the basis that these zonings have been built on and make no contribution to the housing requirement of the area. Housing development had commenced on GHH01 in 2004 and is now complete. Just because the housing zoning is now complete does not mean that it fails to make a contribution to the housing supply for the settlement in the Plan period. This objection does not warrant any change to the Plan.

3.2.30 Objections 331 to **Housing Zonings GHH02 Land between and to the rear of 24 and 28 Station Road, GHH03 Land between 18-22 Station Road, GHH06 Rear of 3-9 Main Street and GHH09 Lands South of Killyvally Bridge** no longer stand as these housing zonings have been withdrawn from the Plan. As noted above these zonings will be withdrawn from the Plan.

3.2.31 Objection 331 to **Housing Zoning GHH04 Land at Thompson Crescent** has been made on the basis of the location of this housing zoning in the town and to the restrictive nature of KSR2 relating to the prevention of adverse noise impact from the nearby engineering works. The housing zoning is a small 0.18 hectare site located to the front elevation of TBF Thompson factory. Given the small scale of the site and its location we consider a design solution would be difficult to overcome any impact of adverse noise from the adjacent engineering works. We accept that the zoning of this land for housing is inappropriate because of the neighbouring land use and support removal of this housing zoning from the Plan. The land should remain as white land within the SDL for Garvagh. Given the small scale of the site the loss of such land would not compromise the strategic objectives or significantly impact on the housing allocation for Garvagh as set out in the Plan.

3.2.32 Objection 331 & 4616 to **Housing Zoning GHH05 Kinnard Park, Fort Road** on the basis of the location of the housing zoning in the town and to KSR1 given high density housing had previously been built on this land. Objection 4616 on the basis that the zoning makes no contribution to the housing requirements for Garvagh. Objection 4386 and 5597 also raised concern that

this housing zoning did not include a designation of land for community use, in particular a Sports Hall, in Kinnard Park. The Jim Watt Sport Centre, which appears to have been recently built, occupies a large portion of the north east corner of this housing zoning. The Plan should be amended to reflect this with the removal of the sport centre from the housing zoning. Taking account of the layout of development shown on the site on Map 3/02 the density is within the range specified in KSR1 which is consistent with the surrounding character of this area. Objector 331 did not present any evidence to justify why higher density should be located on this edge of settlement site, this objection is not sustained.

- 3.2.33 Objections 331 to **Housing Zoning GHH07 22 to 26 Main Street** and **Housing Zoning GHH08 10 Limavady Road** were made on the basis of the location of these housing zonings within the town of Garvagh. No explanation or evidence was provided to substantiate these objections.
- 3.2.34 Objections 331 to **Housing Zonings GHH010 Rear of 24 to 30 Coleraine Road** and **GHH011 Land of Lyttlesdale** was made on the basis that it is not yet certain that additional lands can be acquired to provide access to these housing zonings. The objector's speculation that this land may not become available was not supported with any substantive evidence that would justify the loss of these housing zonings in Garvagh.

The KSR should be Amended or Deleted

- 3.2.35 Objection 4386 to **Housing Zoning GHH11 Land of Lyttledale** was to the omission of a KSR in relation to the provision of an informal play/kick about area. The objector did not substantiate what scale or who should maintain and service such an area. Should the site come forward for housing Regional Policy contained in PPS7 and PPS8 requires that open space provision is made within any housing development. We do not consider that an additional KSR is necessary.
- 3.2.36 Objection 4563 seeks that any development on proposal on **Housing Zoning GHH10 Rear of 24 to 30 Coleraine Road** must include a condition to protect the trees in line with the KSR and LLPA policy. KSR2 of Housing Zoning GHH10 requires that any development on the site identifies trees worthy of protection and details constraints which should be applied. The measures for protection of important trees would be a matter to be assessed and considered through a planning application. Accordingly we do not consider that any amendment should be made to the Plan following consideration of this objection.

Recommendations

- 3.2.37 **We recommend that:**
- **Housing Zonings GHH02, GHH03, GHH06 and GHH09 are withdrawn from the Plan and should remain as white land within the SDL.**

- **Housing Zoning GHH04 Land at Thompson Crescent being removed from the Plan. This land should remain as white land in the Plan.**
- **The removal of land related to the Jim Watts Sport Centre from the north east corner of Housing Zoning GHH05 Kinnard Park, Fort Road from the Plan.**

INDUSTRY, BUSINESS AND DISTRIBUTION

- 3.2.38 Three sites (GHI01 TBF Thompson, GHI02 Mullan's Plant Hire & GHI03 Industrial Units at Mettican Road) were designated for retention for employment purposes within Garvagh. The sites have been identified on Map No 3/02. The main issues raised relate to these sites being already developed for industry and business use.
- 3.2.39 Objection 331 was made to each of the existing industrial designations in the Plan being already developed and that no provision was made for new industrial land within the settlement. The designation of existing industrial land is to ensure the retention of these sites for employment purposes which is consistent with the requirements of Regional Planning Policy set out in Policy PED7 of PPS4. The objector did not provide evidence to substantiate further why these sites should not be designated or how they did not sit within regional policy. Nor did the objection identify other sites within the settlement to be designated for Industry. Accordingly we do not recommend any change to the Plan following consideration of this objection.

DISTRICT CENTRE

- 3.2.40 The Plan identifies a District Centre for Garvagh as shown on Map No 3/02.
- 3.2.41 The Department confirmed that Plan wrongly describes this designation as a District Centre and states that it should be described as a Town Centre in keeping with Regional Policy PPS5. We recognise the Departments error and accept the Designated District Centre should be termed Town Centre for Garvagh.
- 3.2.42 The main issues raised by the objection to this designation include:
- a) The restrictive town centre boundary; and
 - b) The exclusion of housing.

The Restrictive Town Centre Boundary

- 3.2.43 Objection 331 relates to the proposed boundary and seeks its extension to the south to include community facilities including The Youth Centre, St Paul's Church and Community Hall. No map was provided by the objector. The boundary relating to this designation includes the commercial core of the town; no persuasive evidence was presented to explain why the listed community facilities should be within the commercial core of the town. Accordingly we do not accept that the boundary of this designation should be amended.

The Exclusion of Housing

- 3.2.44 Objection 5757 was to the blanket exclusion of housing in the town centre. Paragraph 4.1, Page 117, Volume 2 states that “The boundary has been defined to exclude all significant housing groups, which are considered to have a viable future as a residential environment”. Within the designation there are small housing zonings, namely GHH07 and GHH08. So there is not a blanket exclusion of housing in the centre. Accordingly the objection is not sustained.

Recommendations

3.2.45 We recommend:

- **That Designation GHDC 01 Garvagh District Centre should be titled as Garvagh Town Centre.**

OPEN SPACE

- 3.2.46 The Plan identifies major areas of existing open space for information purposes and zones one area of Open Space (GHO01 land east of Agivey River) as shown on Map No 3/02.
- 3.2.47 The main issues raised by the objection to open space include:
- a) The lack of designated open space; and
 - b) The failure of the Plan to identify a river path connecting Bridge Street with Kurin Road

The lack of Designated Open Space

- 3.2.48 Objection 331 was made on the basis of the failure of the Plan to designate sufficient open space to meet the public needs and enjoyment within Garvagh. The objector states that there are a number of other playing field and park areas which have not been designated, but does not specifically name them. Regardless of being designated or not in the Plan these areas are also subject to regional policy set out in PPS8. The objector also failed to provide evidence relating to who would maintain such areas of designated open space. Accordingly this objection is not sustained.

The failure of the Plan to identify a River Path connecting Bridge Street with Kuirn Road

- 3.2.49 Objections 4386 and 5597 seek an amendment to Open Space Zoning GHO 01 to include a reference to the creation of a riverside path that would connect Bridge Street and Kurin Road. The Department has no objection to the inclusion of a path providing the Council intend to implement any proposals during the Plan period. We consider that this path would be logical and would open up the availability of the open space for the town. We

recommend that Open Space Zoning GHO 01 includes a reference for the provision of such a connecting path.

Recommendations

3.2.50 We recommend:

- **That Open Space Zoning GHO 01 should include a reference to the creation of a river side path connecting Bridge Street and Kurin Road.**

GARVAGH AREA OF ARCHAEOLOGICAL POTENTIAL

3.2.51 An area of Archaeological Potential for Garvagh was identified on Map No 3/02. As we explained in Section 1 of our report, Areas of Archaeological Potential (AAPs) are highlighted in the draft Plan for **information** purpose only. They are not a Plan designation. Consequently we are not in position to address any site specific objections made against this particular AAP or its inclusion on the map.

LOCAL LANDSCAPE POLICY AREAS (LLPAs)

3.2.52 The Plan identifies four LLPAs around Garvagh. The main issues raised by the objectors to the designation of the LLPAs for Garvagh relates to the scale and size of the designations.

The Scale and Size of the LLPA Designation

3.2.53 Objection 331 to **Designation GHL01 Lissatinny LLPA** was made to the overall scale and size of the designation and the overlap of the designation on Housing Zoning GHH10. The Plan identifies the key features which the designation seeks to recognise. As such the identification of these features is a matter to be considered in the development of the housing zoning and does not prevent the development of this site. The objector did not provide any evidence to explain or substantiate how or why the designation should be reduced. Objection 5000 to this designation was in respect of land at Limavady Road. The objector did not provide any evidence to substantiate why the designation should be removed. Accordingly the objections are not sustained.

3.2.54 Objections 331 to **Designations GHL02 Twenty Acres LLPA, GHL03 Garvagh Forest LLPA and GHL04 Agivey River LLPA** were to the overall scale and size of the designations. However no evidence was presented to substantiate how or where these designations should be reduced in size or scale. Accordingly the objections are not sustained.

3.2.55 Objection 5111 seeks the removal of the Designation **GHL02 Twenty Acres LLPA** and for the land to be zoned as white land. At the EIP the objection site was defined as lands to the south and east of Station Road and was indicated on a map in appendix 2 of the objector's submission. The designation aims to protect the key features relating to this area as set out in the draft Plan which are all linked to the Agivey River and Park Land. At this

location the landscape character relates to setting of the edge of the settlement. This includes the surrounding Planting and topography around the dwelling at 21 Station Road, defined by a number of mature trees within and around its boundaries. This landscaping does contribute to the character and setting of the Garvagh when approaching the Station Road. We are not persuaded that the amended objection site should be removed from the LLPA designation.

- 3.2.56 Objection 5119 is to **Designation GHL02 Twenty Acres LLPA**, stating that it should be removed and zoned as white land. The objector did not provide any evidence to substantiate why the designation should be removed.
- 3.2.57 Objection 5771 is to the incorporation of land at 64 Coleraine Road within **Designation GHL02 Twenty Acres LLPA**. The objection seeks the removal of this site from the LLPA. With the exception that the land should be included for housing within the SDL, there was no evidence presented to substantiate why the site should be removed from the LLPA. Accordingly the objection is not sustained
- 3.2.58 Objection 5208 is to the extent of **Designation GHL03 Garvagh Forest** stating that the extent of the designation should be reduced, However, the objection did not provide any evidence to substantiate or illustrate how and why the designation should be reduced. This objection is not sustained.
- 3.2.59 Objections 331 to lands at **Killyvally Road, Station Road around 'The Manse', Coleraine Road, north of Clintonville Gardens and Presbyterian Church, south of Rectory Park, behind 17 Coleraine Road and the Chapel field beside the Police Barrack** all related to any new policy designations on these areas of excluded land. The objector did not refer to any specific designation or give any evidence to substantiate their objection.

DISUSED RAILWAY TRACK BED

- 3.2.60 The Plan recognised the disused rail track bed to the north of the town. Regional Policy contained in PPS3 Policy AMP5 seeks to protect the rail track bed from inappropriate development. The Plan identifies this track on Map 3/02. The main issue raised by the objector to the Disused Railway Track Bed is the level of protection that is afforded to it through the Plan.
- 3.2.61 Objection 331 argued that the railway track bed has not been used for years; there is no need for this level of protection. The Plan identifies the disused rail track bed. Paragraph 8.1 of the Plan clearly stated that the appropriate policy for the protection of such disused railway beds is set out in Regional Policy PPS3 Policy AMP5. The Regional Policy is not open to objection through the draft Plan.

3.3 KILREA

- 3.3.1 Kilrea has been designated as one of four towns in the Coleraine District. This elevates its position from that of a village in the NEAP. The Settlement Development Limit (SDL) for Kilrea, Designated KA01, is identified on Map 3/03

Plan Provision for Housing

- 3.3.1 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 233 housing units in Kilrea. Between January 1999 and August 2010 some 151 housing units were completed. The housing Up-date Figures Paper March 2011 estimated there is a surplus of 229 units (98.3%) above the Plan allocation remaining in Kilrea and there is no need to expand the SDL.

Social Housing

- 3.3.2 There was no social housing need presented for Kilrea.

Settlement Development Limits (SDL)

- 3.3.3 We concluded in section one of the report that there is no strategic need to allocate further housing land in Kilrea. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL, zoning of additional housing land or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of our report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Kilrea. Our assessment of the objections is as follows:
- 3.3.4 Objection 331 seeks the inclusion of land beside the graveyard along the **Moneygran Road**. The objection site relates to land surrounding the Woodhall Residential Centre, which is now part of a proposed LLPA designation KAL01. The objection site relates to an extensive area reaching from the Moneygran Road to the rear of the existing road side dwellings along Lisnagrot Road. Notwithstanding the environmental constraints as acknowledged by the LLPA designation the inclusion of this land would significantly expand the south eastern area of the town. Such an expansion in this area would threaten the setting of the settlement at this location giving rise to unnecessary urban sprawl. There is no justification for the inclusion of this land within Kilrea.
- 3.3.5 Objections 331 seek the inclusion of two fields **along Lisnagrot Road and south of Woodhall Residential Centre** within the SDL. The SDL has been drawn around the edge of the existing road side development along the east side of Lisnagrot Road. This land is within the proposed LLPA designation KAL01 which recognises the environmental quality and character of this

landscape. The inclusion of two additional fields would appear irregular in terms of the urban form at this location and would threaten the environmental setting of the settlement at this location.

- 3.3.6 Objections 331 and 4986 seek the inclusion of land **behind the Bus Depot and the Community Centre along Drumgarner Road** within the SDL. The objection site is one large field that abuts the edge of the SDL and the Industrial Designation KAI01. There are no environmental constraints relating to this land although its inclusion by itself would give rise to a gap in the urban form from the main body of the settlement. There is no justification for the inclusion of the objection site within the SDL.
- 3.3.7 On land **south of Kilrea Enterprise Centre and east of the Drumgarner Road** objection 331 seeks the inclusion of this land. This objection site overlaps the proposed Designation KAL06 Horse Fair Green LLPA. This LLPA provides openness to the edge of the existing built form of Kilrea with the presence of mature beech trees that are important to the setting of the Kilrea at this location. The land is a vital element of the LLPA designation and would be best placed outside the SDL.
- 3.3.8 Objection 331 relates to land **behind the Toberdoney Fold**. The objection site is bounded by the Fold to the north east, a builder's yard to the south east and the disused railway line to the south west. With exception to the railway line there are no constraints for development on the site although the land does not have access to the public road. However the inclusion of the land would unnecessarily expand the settlement to the west resulting in further urban sprawl.
- 3.3.9 Objection 331 seeks the inclusion of land at the **Manor Golf Club**. The objection site relates to land within the curtilage of the Golf Club and west of Fairways housing development. The land is within the proposed designation KAL03 which seeks to protect the setting of the Golf Club and Washing Lough. The land is a vital element of the proposed LLPA designation. The site would therefore be best placed outside the SDL given the environmental and visual contribution this land makes to the setting of Kilrea at this location.
- 3.3.10 Objection 331 relates to land beside **Claragh Hill, Agivey Road**. The boundaries of the site as indicated by the objector fail to follow any natural boundaries in this area. Part of the objection site overlaps housing site KAH01, which has been developed. The inclusion of the remaining part of the objection site that is outside the SDL would not be logical as it does not follow any natural or manmade boundaries or features on the ground.
- 3.3.11 Objection 331 relates to three fields behind **64 Bann Road** within the SDL. However the map relates to land behind 64 Bridge Street and Mill Road. This land is very steep and sits well within the urban form. Given the lack of need for additional land within the SDL for Kilrea, there is no justification for the inclusion of this land.
- 3.3.12 Objections 331 seeks the inclusion of land labelled '1' between **Drumgarner Road and Lisnagrot Road**, land labelled '2' south of **Garvagh Road and Blackrock Road** and land labelled '3' between

Moneydig Road and Agivey Road all within the SDL. Given the individual scale and size of these sites combined with a lack of evidence to support their inclusion within the SDL, we consider these sites should remain outside the SDL.

- 3.3.13 On land to the **rear and adjacent to Bannview Terrace**, objector 343 seeks its inclusion on the basis that this land would round off the settlement at this location. The objection site is some 4.8 hectares and falls within the proposed LLPA designation KAL05 Portneal LLPA. Almost 50% of the site is within the Bann River Flood plain and all of the land is within the Odour Consultation Zone. Aside from the environmental constraints to the land in this area, the inclusion of the objection site would result in further linear expansion along Bann Road. The site is more than just a rounding-off of the settlement at this location. The inclusion of this land would give rise to further urban sprawl failing to create a compact form of development.
- 3.3.14 Objections 345 and 4844 seek the inclusion of land behind **Manor Golf Club** within the SDL, on the basis that the inclusion of this site would round off Kilrea. Objection 345 relates to 2.92 hectare site and overlaps the proposed LLPA Designation KAL03 and includes Washing Lough, which makes up 50% of site area. Objection site 4844 relates to a 1.56 hectare site, to the immediate south and south east of Manor House. Whilst the land on both sites abuts the town edge to the north and sits within the urban form, this area of land contributes significantly to the setting of the town because of its visual and landscape character. It also forms part of the setting of Manor House, a listed building. Development on this land would adversely affect this character and would visually detract from the appearance of this Listed Building. Accordingly it is appropriate that both objection sites should remain outside the SDL.
- 3.3.15 Objection 347 seeks the inclusion of land **adjacent and to the rear of 40 Lisnagrot Road** within the SDL, on the basis this land will result in a rounding-off the SDL. This land falls within the proposed LLPA designation KAL01. The designation seeks to protect the small distinctive hills associated with the setting of Kathleen's Lough. The development of this land would result in the loss of these hills that are important to the setting of the settlement at this location. The development of this land for housing would also give rise to further linear urban sprawl along the Lisnagrot Road. It is therefore appropriate that this land remains outside the SDL.
- 3.3.16 Objections 4364 seeks the inclusion of land at **Moneygran Road** for low density housing and land adjacent to **Blackrock Park** for affordable housing and or warehousing. Objection 5311 also relates to the inclusion of land at Moneygran Road within the SDL for housing and Objection 4964 also relates to the land adjacent to Blackrock Park for zoned industrial use. The land at Moneygran Road relates to a vacant area of land bounded by mature vegetation and sits well within the urban form with St Patricks Church and housing land to the west and a proposed housing zoning KAH07 to the east. Development on this land would result in a compact urban form. The land adjacent to Blackrock Park relates to two flat fields which combined to make a triangular road side site. Development on this land would give rise to further linear urban sprawl to the north west of the settlement.

Notwithstanding the urban form arguments in relation to both sites, none of the objectors presented any evidence to substantiate an overriding need for additional housing, warehousing or business use in Kilrea. Accordingly neither site should be included within the SDL.

- 3.3.17 Objection 4386 and 5597 were made on the basis that suitable sites were available on the edge of the SDL that could be included within the settlement and zoned for housing. Both objections refer to **Garvagh Road, Edenbane Road and Bann Road** areas, but failed to provide any map to indicate the land. The assertion made by the objection that some zoned housing land because of church ownership, would not come forward was unsupported. Accordingly these objections are not sustained.
- 3.3.18 Objection 4566 is to the non inclusion of land at **Mill Brook, 30 Pond Park, Mill Road** within the SDL, and the failure of the Plan not to designate this site a development opportunity site as residential, business or commercial use. The site is occupied by a former Mill, which is now derelict and surrounded by mature vegetation. To the west of the mill is the old mill pond, Kilrea Dam, a large area of water and an important landscape feature in this area. Since the publication of the Plan planning permission C/2003/0340/F/2006/A418 has been granted on the objection site for the construction of 16 dwellings. Given the site's detachment from the SDL we support the Department's recommendation not to include this site in the settlement of Kilrea.
- 3.3.19 Objection 4581 seeks the inclusion of land **adjacent to 20 Bann Road** within the SDL. The objection is north of the Bann Road beside the Kilrea Waste Water Treatment Works. It is therefore within the odour consultation zone. There are also archaeological constraints to the site and it falls within the proposed LLPA designation KAL04 Mill Brook. The road side boundary of the site ties in with the road side development that falls within the SDL to the south side of the Bann Road. However the depth of the objection site goes beyond the logical edge of the existing development to the north. The inclusion of this land would therefore not give rise to a compact rounding off at the edge of the settlement. This site should remain outside the SDL.
- 3.3.20 Objection 4664 seeks that the SDL is extended to include **132, 134, 136 & 138 Moneydig Road**, given development already exists in this area. The objection site is a small area of land between Edenbane Road and Moneydig Road, where a significant portion has been developed leaving small opportunities for infilling and rounding off, such development opportunities would exist in accordance with Regional Policies for the countryside. No persuasive evidence was presented to suggest why it would be logical to include this land within the SDL. We therefore conclude this land should remain outside of the SDL.
- 3.3.21 Objections 4757 & 4759 seek the inclusion of land to the **rear of Toberdoney Fold** within the SDL. This is small gap surrounded by development to the north, south and east. The west boundary is heavily treed and is the disused railway line, which is a proposed LLPA designation KAL07 in the Plan. The inclusion of this land within the SDL would present a logical rounding off of the settlement at this location. However, given the lack of

need for development land in Kilrea it is appropriate that it remains outside the SDL.

- 3.3.22 Objections 4757 & 5338 seek the inclusion of one field and Objections 331 & 4986 seek the inclusion of two fields to the **south west of Mill Road and south of the Print Works**. Whilst the land is bounded by development to its north, south and west it rises steeply up from the road to the rear of the existing properties at Coleraine Street. Any development on this land would be elevated and dominate the edge of the settlement and would not represent a logical inclusion within the SDL.
- 3.3.23 Objection 4932 seeks the inclusion of three fields to **the rear of 7, 9 & 11 Drumgarner Road**. The site relates to some 4.3 hectares of land and abuts the proposed housing zoning KAH06. The north east boundary is defined by the disused Derry Central Railway track which is a proposed LLPA designation KAL06 in the Plan. The land at present is in agricultural use and gently rises from the east to west. The objection site is not visually prominent and sits well to the rear of the existing road side development along Drumgarner Road. The Department also acknowledged that it is relatively free from any environmental constraints. However the inclusion of this land would give rise to a significant extension to the west side of Kilrea resulting in further urban sprawl in this area. It should therefore remain outside the SDL.
- 3.3.24 Objections 4970 & 5338 seek the inclusion of land at **Mill Road opposite the Print Works** within the SDL. Objection 4970 seeks the land to be zoned for business use and objection 5338 seeks the land to be zoned for housing. The objection site is a road side triangular parcel of land. The site is predominantly flat but rises to the west. The Department acknowledged that there are no environmental constraints to the site and that there would be advantages to the inclusion of land within the SDL as it abuts development along two boundaries. We also accept that this site could make a logical inclusion within the SDL. However, the specific characteristics of this site are not sufficient to override the overprovision of housing land in Kilrea.
- 3.3.25 Objection 4986 seeks the inclusion of land at **Blackrock Road** within the SDL for housing. The site rises to the south east and is visible from the Blackrock Road. Development on this land would have some degree of prominence from the surrounding road network. The land has minimal environmental constraints that would restrict its development potential, but if included it would unnecessarily extend the settlement in a linear form along Blackrock Road. We consider it is appropriate that it remains outside the SDL.
- 3.3.26 Objection 4986 also sought the inclusion of land along **Garvagh Road** within the SDL for housing. No map or means of identification of this land was provided to support the objection. Accordingly the objection is not sustained.
- 3.3.27 Objection 5091 relates to one field opposite **47 Lisnagrot Road** and seeks its inclusion within the SDL given there is planning permission for one dwelling on the site. Regardless of the planning history the site is not physically linked to the SDL along the east side of the Lisnagrot Road. The

inclusion of the objection site is not logical in terms of urban form as it would result in an irregular pattern of development to the edge of the settlement.

- 3.3.28 Objection 5213 seeks the inclusion of land to the **west of 31-37 Lisnagrot Road** within the SDL to be zoned for housing. A small square road side portion of the site is within the SDL. The site abuts development to the north and east and would represent a logical rounding off to the settlement at this location. It is generally free from environmental or planning constraints. However the over provision of housing in Kilrea outweighs the site specific characteristics of this land. We recommend that the land remains outside the SDL.
- 3.3.29 Objection 5338 relates to the inclusion of 4.32 hectares of land to the **east of Agivey Road**. The land rises to the east of Agivey Road, but would be generally screened by the strong boundary to the west. Notwithstanding the strong boundary its inclusion within the SDL would give rise to large linear extension to the north side of the settlement. We therefore consider it is appropriate that this land remains outside the SDL.
- 3.3.30 Objections 5338 & 5727 seek the inclusion of land north of **10 Bann Road** within the SDL for housing. The Department confirmed that a vast majority of this site now has planning permission with the small wooded area to the north of the site having protection by means of a TPO. The Department has recommended that boundary of the SDL should be amended to incorporate the boundaries of the planning permissions C/2004/0356/O, C/2005/0575/RM & C/2006/0530/F with the wooded area to the north remaining outside the SDL. We accept that this is logical and support the Departments recommendation.
- 3.3.31 Objection 5338 relates to land north of **Bann Road and south of the Waste Water Treatment Works** which is within the odour consultation zone. The land also falls within the proposed LLPA designation KAL04 Mill Brook. The inclusion of this land would unnecessarily extend the linear form of development along the Bann Road and would therefore not give rise to a compact rounding off at the edge of the settlement. We accept that this site should remain outside the SDL.
- 3.3.32 Objection 5624 seeks the extension of the SDL to include **west of Beech Grove, Garvagh Road and to the line west of Toberdoney Fold to the railway line**. The objection was not supported with a map or any evidence to substantiate a need for additional land in this area. The objection is not sustained.
- 3.3.33 Objection 5696 relates to a large area of land along **Drumgarner Road to Drumane Road**. The objector seeks either housing on the land or as white land. The site comprises 5 fields of undulating land to the south of the settlement. The Department have stated that with exception to the presence of an unscheduled archaeological monument the site has no other environmental constraints that would restrict development. Notwithstanding the grant of permission for two separate dwellings on the land the inclusion of this site would represent a significant extension to this part of the settlement. Irrespective of the density of development on the site be it 25 dph or 7-9 dph

we consider that the inclusion of the site would result in a significant expansion to the south of the settlement failing to result in a compact urban form. This land should remain outside the SDL.

Land should be Zoned within the SDL for Housing

- 3.3.34 Objection 5089 seeks the rezoning of Industrial Designation **KAI01 east of Drumgarner Road** to housing land. As the Plan objective is to protect existing industrial land and there is no need for additional housing in Kilrea, the objection is not sustained.

Recommendations

- 3.3.35 **We recommend:**

- **That the SDL for Kilrea is amended to include objection site 5338 and 5727 relating to the planning permission (C/2004/0356/O, C/2005/0575/RM & C/2006/0530/F) for housing granted on the site.**

HOUSING ZONINGS

- 3.3.36 The main issues raised by the objections relate to the removal of housing zonings from the Plan.
- 3.3.37 Objection 331 to **Housing Zonings KAH03 land to rear of 9 to 15 Garvagh Road** on the basis that this area of land constitutes an area of open space. The housing zoning is occupied by existing farm buildings and is immediately adjacent to the existing extensive area of open space in the centre of Kilrea. The objector did not present any need for additional land to be made available for open space in this area or who was going to maintain the space. Objection 4352 to this housing zoning was on the basis that the land is not in development use as it is occupied with prefabricated chicken houses and that the use of this land for housing will threaten the future open space of the adjoining land. The reuse of brown field previously developed site is acceptable and provides a sustainable solution for the provision of housing land in a town. The objector did not substantiate how additional houses in this small zoning would threaten the open space area. Accordingly the objections are not sustained.
- 3.3.38 Objection 331 to Housing Zoning **KAH04 between 49 & 57 Maghera Street** and was made on the basis that KSR3 states that additional land may be required to provide an access to Maghera Street. The objector's speculation that this land may not become available was not supported with any substantive evidence that would justify the loss of this housing zoning in Kilrea.
- 3.3.39 Objection 331 to Housing Zoning **KAH05 between 17 and 25 Church Street** on the basis of its location within Kilrea was not substantiated.
- 3.3.40 Objection 331 to Housing Zoning **KAH06 adjacent to 7 Drumgarner Road** on the basis that the disused railway link runs through the site. The objector

stated that the development of the site would have to be orientated around the path of the railway line and therefore is the designation of this land was inappropriate. The site shows no trace of the railway track and appears as a green field gap between the existing road side developments. The Plan makes no reference to the disused railway track in respect of this housing zoning. The objection against this zoning is unfounded.

- 3.3.41 Objection 331 to Housing Zoning **KAH07 land to the north side of Moneygran Road** on the basis that this site falls within the Designation KAL03. Paragraph 7.4, Page 125, Volume 2 of the Plan refers to the sensitive development of this site. The designation does not prevent development on the housing zoning. The objection is not sustained.

TRAFFIC

- 3.3.42 The main issue relating to traffic in Kilrea relates to the omission of a traffic diversion scheme.
- 3.3.43 Objections 4386 and 5597 raised the failure of the Plan to include measures to ensure the diversion of heavy traffic from the town centre. This was based on the consideration that traffic flows in Kilrea are an increasing problem and that a forward planning measure should address this issue. The objectors did not provide any evidence to demonstrate the increasing traffic problems nor did they present any solutions as how such problems could be resolved. Accordingly the objection is not sustained.

INDUSTRY, BUSINESS AND DISTRIBUTION

- 3.3.44 Four sites relating to areas of existing industry were designated for retention for employment purposes within Kilrea. These sites include KAI01 Drumgarner Road, KAI02 Horse Fair Green and east of New Row, KAI03 Mill Road & KAI04 Craiglea Gardens. These sites have been identified on Map No 3/03 Kilrea. The main issues raised relate to:
- (a) The location of the proposed designations in the settlement; and
 - (b) Failure to zone land for industry, business and distribution.

The location of the Proposed Designations in the Settlement

- 3.3.45 Objections 331 were made to each of the four Existing Industry Designations KAI01, KAI02, KAI03 and KAI04 of the Existing Industry based on the location of each of these within the settlement. No evidence was presented to substantiate why these sites should not be designated as existing industry site or why the location of these designations within the settlement was inappropriate. Accordingly these objections are not sustained.

Failure to Zone Land for Industry, Business and Distribution

- 3.3.46 Objections 4388 & 5597 were to the failure of the Plan to designate additional land for industrial use. Both objections referred to land at the **Civic Amenity Site and along the Garvagh Road**. The issue of sufficient industrial land in

each settlement was addressed in Section one of the report relating to industry. The objectors did not present any evidence to suggest or substantiate a need for additional land to be designated for this use. Whilst the objectors also referred to two areas within the settlement no map was provided for consideration. The Civic Amenity site is located along Lisnagrot Road some 100 metres to the south of the SDL and is therefore not physically linked to the settlement. Accordingly it would be inappropriate to zone land for industry in the countryside. No further information was provided relating to land along Garvagh Road. The objections are therefore not sustained.

- 3.3.47 Objection 4964 seeks the inclusion of land adjacent to **Blackrock Road, Edenbane Road** within the SDL for business use. The site comprises two fields that combine to make a triangular road side site located to the Edenbane Road and north of housing at Blackrock Park. The land is relatively flat with low hedge boundaries to the east. A 7-9 metre high mature belt of vegetation provides a physical edge to the settlement along the sites southern and western boundary. The inclusion of this land within the SDL would result in a further linear extension to the settlement along this road which would not give rise to a compact urban form. The surrounding area being predominantly residential to the south and farm land to the north could present constraints to any business use on the site. The objector did not provide any evidence to substantiate a business need in this area. Accordingly we consider the sites location outside the SDL is appropriate.
- 3.3.48 Objection 4970 seeks the inclusion of land along **Mill Road** within the SDL and that it should be designated for business use. The objection site is a triangular field stretching back from Mill Road to the rear of residential properties along Agivey Road. The land gently falls towards a minor water course and the west part of the site rises steeply to the crest of a small hummock. As concluded above in paragraph 3.3.24 the site would make a logical inclusion within the SDL. The objector presented the case that the land would be used for light industry to accommodate a kitchen manufacture business. The Plan has not zoned any land new in Kilrea for industry. At the EIP the Department stated there was sufficient land already within the SDL to meet any commercial, business or industrial needs for the settlement. On this basis we are not persuaded that is an overriding need for this land to be included within the SDL. Accordingly the objection is not supported.

DISTRICT CENTRE

- 3.3.49 The Plan identifies a District Centre for Kilrea as shown on Map No 3/03.
- 3.3.50 The Department confirmed that Plan wrongly describes this designation as a District Centre and states that it should be described as a Town Centre in keeping with Regional Policy PPS5. We recognise the Department's error and accept the Designated District Centre should be termed Town Centre for Kilrea.
- 3.3.51 The main issue raised by the objection to this designation is the restrictive nature of the boundary for the town centre.

- 3.3.52 Objection 331 is to the tight boundary and argues that it should be extended to the south to include community facilities at the roundabout and out along the Lisnagrot Road. No map was provided by the objector. The boundary relating to this designation includes the commercial core of the town; no persuasive evidence was presented to explain why the community facilities should be within the commercial core of the town. Accordingly we do not accept that the boundary of this designation should be amended following consideration of this objection.

Recommendations

- 3.3.53 **We recommend:**

- **That Designation KADC 01 Kilrea District Centre should be titled Kilrea Town Centre.**

OPEN SPACE

- 3.3.54 The Plan identifies major areas of existing open space in Kilrea for information purposes and is shown on Map No 3/03. The main issues relate to:

- (a) Insufficient open space;
- (b) Remove open spaces zonings from the Plan.

Insufficient Open Space

- 3.3.55 Objection 331 was made on the basis of the failure of the Plan to designate sufficient open space to meet the public needs and enjoyment within Kilrea. The objector states that there are a number of other playing field and park area which have not been designated, but does not specifically name them. These areas are also subject to the requirement of open space as set out in the regional policy contained in PPS8 regardless of their designation in the Plan. The objector also failed to provide evidence relating to who would maintain such areas of designated open space. Accordingly we do not consider further areas of open space should be designated in the Plan following consideration of this objection.

Remove Open Space Zonings from the Plan

- 3.3.56 Objection 5462 is to the zoning of open space **at lands to the rear of 13 Garvagh Road and land to the north east**. The Department have acknowledged that since the publication of the draft Plan that the identified site as open space has received outline Planning permission at appeal (2006/A0300 & C/2005/0113/O) for housing. Accordingly the Department recognises that it is not appropriate to identify the objection site as open space. We accept that it logical that the plan should reflect the grant of planning permission on this area of open space.

Recommendations

3.3.57 **We recommend:**

- **The area of open space that relates to planning permission C/2005/0113/O & 2006/A0300 for housing should be removed from the Plan.**

AREA OF ARCHAEOLOGICAL POTENTIAL

3.3.58 An Area of Archaeological Potential for Kilrea was identified on Map No 3/03. As we explained in Section 1 of our report, Areas of Archaeological Potential (AAPs) are highlighted in the draft Plan for **information** purposes only. They are not a Plan designation. Consequently we are not in position to address any site specific objections made against this particular AAP or its inclusion on the map.

LOCAL LANDSCAPE POLICY AREAS (LLPA)

3.3.59 The Plan identifies seven LLPAs around Kilrea. The main issue relate to the scale and size of the LLPA Designation seeking the removal of land from the LLPA.

3.3.60 Objections 331 to **Designation KAL01 Kathleen's Lough, KAL02 St Patrick's, KAL03 Washing Lough, KAL04 Millbrook, KAL05 Portneal, KAL06 Horse Fair Green and KAL07 Derry Central Railway** were made on the basis of the overall scale and size of the designations stating that they would halt development in the town. However no evidence was presented to substantiate the objection or to how or where these designations should be reduced in size or scale. Accordingly the objections are not sustained.

3.3.61 Objection 347 is to the inclusion of land behind **40 Lisnagrot Road** within Designation **KAL01 Kathleen's Lough LLPA**. The objector states that the area is far too extensive and far reaching in the area of Kilrea and considers the objection site to be prime land for development. This LLPA is centred on Woodhall Residential Centre including Kathleen's Lough which is a designated SLNCI. The designation seeks to protect the combination of features that contribute to the environmental quality and integrity of character of this area. The objection site is an integral part of this area and the objector provided no persuasive evidence to remove it from the LLPA designation. The objection is not sustained.

3.3.62 Objection 5524 seeks the removal of lands between **Lisnagrot Road and Moneygran Road** from Designation **KAL01 Kathleen's Lough LLPA**. The objector states that all of the land does not have exceptional landscape quality, for three reasons including: 1) the trees are generally small; 2) part of the LLPA adjoins the refuse tip; and 3) planning permission for a dwelling has been granted adjacent to 47 Lisnagrot Road. The objector also stated that if LLPA were retained it could facilitate low density housing in this area and that this would have a planning gain that could be reflected in the supporting text of page 124 of the Plan. Landscape Architects Branch advised the Department that the objection site was included within the LLPA because of

their contribution to the views and setting of Kathleen's Lough. The surrounding vegetation forms a good visual stop to development and recommends that the objection site should remain within the LLPA. We support this view, the objection site regardless of its location beside the refuse tip and the height of the vegetation all contribute to the setting of Kathleen's Lough. The surrounding area has number of small hills which are important to the integrity and character of this area. The grant of planning permission for one dwelling would not detract from the overall character of this LLPA. Given there is no strategic need for more housing in Kilrea the removal of the objection site from the LLPA would not give rise to any planning gain in this area. Accordingly the objection site should remain within the LLPA designation.

- 3.3.63 Objection 5091 seeks the removal of land at **Lisnagrot Road** from Designation **KAL01 Kathleen's Lough LLPA**, on the basis that the designation is not justified as there is sufficient policy to cover this area. The LLPA designation sits with the overall objectives of the Plan as set out in strategic report. The objector did not provide any persuasive evidence to justify the removal of the land from the LLPA designation.
- 3.3.64 Objection 345 is to the inclusion of land at **Manor Country Club** within Designation **KAL03 Washing Lough LLPA**. The objector states that the area is far too extensive and far reaching at this location in Kilrea and considers the objection site to be prime land for development. This LLPA has been designated in three areas, including Manor Golf Club and aims to protect its environmental quality, integrity and character. The objection site is an integral part of this area and the objector provided no persuasive evidence to remove it from the LLPA designation. The objection is not sustained.
- 3.3.65 Objection 5311 seeks the removal of land along **Moneygran Road** from Designation **KAL03 Washing Lough LLPA**. The objector failed to provide any evidence to explain or substantiate their reasoning for the removal of the objection site from the LLPA designation.
- 3.3.66 Objection 4386 is to the identification of land at **Mill Brook, 30 Pond Park**, within Designation **KAL04 Mill Brook LLPA**. Planning permission C/2003/0340/2006/0418 for housing has been granted on this site since the publication of the plan. The objector presented no evidence to state why the site should be removed from the LLPA. Objection 4844 seeks the removal of this designation from land at **Manor Golf Club**. No evidence was presented to substantiate the objection.
- 3.3.67 Objections 5338 seek the removal of lands along **Bann Road** from **Designation KAL04 Mill Brook LLPA and from Designation KAL05 Portneal LLPA**. The objector failed to provide any evidence to explain or substantiate their reasoning for the removal of the objection sites from either of the LLPA designation.
- 3.3.68 Objection 343 to the inclusion of land at **Bann Road** within Designation **KAL05 Portneal LLPA**. The objector states that the designation is too extensive and that land at Bann Road has been unjustly included in this area. This LLPA has been designated because of the broad meander of the Bann

River at this location. The designation would not prevent development of itself at this location rather it highlights the key features that contribute to the environmental quality, integrity or character of the area. We are not persuaded that the objection site should be removed from the designation.

- 3.3.69 Objections 331 to lands at **Moneygran Road, Woodhall Residential Centre, Lisnagrot Road and South of Woodland Park, behind the bus depot along Drumgarner Road, behind the Community Hall Drumgarner Road, behind Toberdoney Fold and Manor Golf Club** all relate to any new policy designations on these areas of excluded land. The objector did not refer to any specific designation or give any evidence to substantiate their objection.

3.4 PORTRUSH

HOUSING

- 3.4.1 Portrush has been designated as one of four towns in the Coleraine District. This affirms its status as a town as designated in the NEAP. The Settlement Development Limit (SDL) for Portrush is identified on Map 3/04a.

Plan Provision for Housing

- 3.4.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 1086 housing units in Portrush. Between January 1999 and August 2010 some 1328 housing units were completed. The housing Up-date Figures Paper March 2011 estimated there is a surplus above the Plan allocation of 1208 units (111.2%) remaining in Portrush and there is no need to expand the SDL.

Social Housing

- 3.4.3 The updated (March 2011) Housing Need Assessment figures indicated a substantial increase in social housing need for Portrush, of some 75 units for the next 7 year period (2011 – 2018). To assist the delivery of these sites the Department accepted that this need could be met using land outside the SDL and that the inclusion of such land within the SDL would be subject to a KSR that this housing land must be used to meet the social housing needs of Portrush. Since the publication of the Plan both NIHE and the Department have been working together using set criteria to best identify how to meet the social housing need for Portrush. At the EIP four potential sites were identified as follows in order of the Departments preference:

- Site 1 Land at Hopefield Park – objection 5527
- Site 2 Land opposite Castleview along Ballywillian Road – objections 329, 331 (part off)
- Site 3 Land adjacent to Glenmanus – objection 4825
- Site 4 Land at Hopefield Road West – objection 5527

- 3.4.4 Strategic Policy relating to meeting social housing need in the Plan area is addressed within Policy HOU5 Meeting Community Housing Needs. Section one of our report concludes that while these sites have been identified jointly by the Department and NIHE, we will only give consideration to the inclusion of land solely for social housing where there is a clear willingness on behalf of the objector to accommodate such social housing on their land and where we are satisfied that there are sound physical planning reasons for the inclusion of that land within the SDL. All of the above 4 sites were subject to the written representation procedure and we have no persuasive evidence to demonstrate willingness on behalf of the objectors on these sites. Based on the issue of fairness and transparency we cannot consider the inclusion of any of these sites within the SDL for Portrush to meet the required social housing need.

Settlement Development Limits (SDL)

- 3.4.5 We concluded in section one of the report that there is no strategic need to allocate further housing land in Portrush. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of our report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Portrush. Our assessment of the objections is as follows:
- 3.4.6 Objection 329 relates to 1 hectare of land **south of Dhu Varren Village**. The site is a diamond shaped field and sits into the existing SDL between Dhu Varren Park and Garron Park. Access to the site is via steep narrow road and further development in this area would require major improvements to Dhu Varren Road and Portstewart Road. The inclusion of this land would add to the expansion of the settlement along this narrow road further extending the linear form. This would fail to give rise to a compact form of development at this location.
- 3.4.7 Objection 329 on 4.24 hectares of land **south of Ballywillan Crescent along Ballywillan Road** was identified by the Department as a potential site to meet the social housing provision for Portrush. The land abuts the settlement to its northern boundary and sits opposite existing housing at Carneybaun Drive. The inclusion of the entire site would yield up to 112 units at 25 dph. There is no overriding need for additional land of this scale to be included for housing. The Department and NIHE identified that 1 hectare of this land along the northern boundary of the site would make a logical extension to the settlement to meet the need for 25 residential units for social housing provision. Having concluded in paragraph 3.4.4 above we cannot consider this land for social housing we recommend that all of this land should remain outside the SDL.
- 3.4.8 Objection 331 seeks the inclusion of land labelled '1' which relates to land to the **west of Portrush around the Holiday Park and Glenmanus Road**, (not Dunluce Road). The objection site is an extensive area which if included would result in a substantial expansion of the settlement to the west. The inclusion of land of this size and scale within the SDL would fail to give rise to a compact urban form at this location.
- 3.4.9 Objection 331 seeks the inclusion land of labelled '2' which relates to land to the east **of Portrush around the Holiday Park and Dunluce Road** (not Glenmanus Road). The objection site is an extensive area which if included would result in a substantial expansion of the settlement to the east of the settlement. The inclusion of land of this size and scale within the SDL would fail to give rise to a compact urban form at this location.

- 3.4.10 Objection 331 seeks the inclusion of land labelled '3' which relates to land east of **Magherabouy House Hotel, Magherabuoy Road**. This site is surrounded by SDL on three sides and if included would sit neatly into the urban form at this location. However the over provision of housing in Portrush outweighs the site specific characteristics of this land. Accordingly there is no justification for expanding the SDL to include this objection site.
- 3.4.11 Objections 331 both seek the inclusion of land labelled '4' which relates to land to the west of **Portrush around Dhu Varren Caravan Park** and to **three fields situated at Dhu Varren Caravan Park**. This land is currently occupied by an operational caravan park. As concluded in Section 1 of our report caravan parks shall remain outside the SDL. There is no justification to substantiate its inclusion within the SDL.
- 3.4.12 Objection 331 seeks the inclusion of land labelled '5' which relates to land **along the Coastline of Portrush**. The objection site relates to the West Strand area, some of which is already within the SDL. This area includes the environmental and visual coastal setting for Portrush. Given the environmental coastal restrictions and sensitivity of this site we consider that it is appropriate that land remains outside the SDL.
- 3.4.13 Objection 331 seeks the inclusion of land labelled '6' which relates to land **around Ramore Head along the Coastline of Portrush**. The objection site relates to north coastal area of Portrush which overlaps the proposed LLPA Designation PHL01. This area includes the environmental and visual coastal setting for Portrush. We see no justifiable basis to include this land within the SDL.
- 3.4.14 Objection 331 seeks the inclusion land labelled '7' which relates to small area of land **behind 115 Causeway Street in Portrush**. The inclusion of this land would sit into the proposed SDL with a large car park to the north and recent housing development to the south. A partially built apartment block is located to west on Housing Zoning PHH02. However, the objector failed to provide sufficient evidence to substantiate why the remaining area of land should be included within the SDL.
- 3.4.15 Objections 331 seeking the inclusion of land labelled '1' at **Ballywillan Road** (part social housing Site 2), land labelled '2' at **Magheraboy Road** '2'; (part social housing site); land labelled '3' **Dhu Varren Park** and land labelled '4' land **south of Portrush Golf Course** were unsubstantiated with evidence. With exception to the need for social housing land at Ballywillan Road and Hopefield Road there is no overriding justification for the inclusion of this land within the SDL. The objector did not present any evidence to demonstrate their willingness to develop the land solely for social housing. On this basis we are satisfied that all this land should remain outside the SDL.
- 3.4.16 Objection 4825 which seeks the inclusion of some 5.6 of land **south of Glenmanus, Loguestown Road**, was also identified by the Department as a suitable site to meet the social housing need for Portrush. The objection site relates to 4 field parcels sharing frontage with Coleraine Road and Loguestown Road. It also abuts an area of open space to its northern boundary. A summit lies to the middle of the site and provides a ridge to the

edge of the settlement. At the EIP the Department accepted that 1 hectare relating to the most northern field abutting the area of open space would be a suitable site to accommodate 25 residential units necessary to meet the social housing needs for Portrush. The Department stated that this small area of land if developed would naturally sit within the context of the surrounding development at Glenmanus and the housing development on the opposite side of the road at Magheraboy Avenue. However the site is located in an open prominent position along the Coleraine Road, which is a protected route. The most feasible access for this site would be directly onto the protected route. The 25 residential units would only add to the existing large scale housing executive development at Glenmanus. The NIHE confirmed that the social housing needs in this part of the town were already met by the existing housing provision at Glenmanus. Whilst we accept there are some locational merits relating to this site, we have no persuasive evidence to demonstrate that the objector or land owner would be willing to provide land only for social housing. Given the site constraints, the close proximity to existing NIHE housing and a lack of evidence to demonstrate a willing to make the land available only for social housing we consider this land should remain outside the SDL.

- 3.4.17 Objection 4854 seeks the inclusion of a small area of land bounded by **Hopefield Road and Magheraboy Road**. The site is occupied by a group of buildings which access onto Magheraboy Road. The land is physically detached from the edge of the settlement by large open fields. The site does not present a logical inclusion within the SDL for Portrush. Accordingly the objection is not sustained.
- 3.4.18 Objections 4919 seek the inclusion of some 3.25 hectares of land at **Dhu Varren** currently occupied by an operational caravan park and some 5.8 hectares of land at **Hilltop Holiday Park** to the south west of Portrush within the SDL as white land. Objection 4923 also relates to the inclusion of land at Hilltop Holiday Park as housing land. The holiday park at Dhu Varren is located close to the shoreline and West Bay and is within reasonable walking distance from the town centre. It also sits within context of a neighbouring caravan park at Carrick Dhu. The site at Hilltop Caravan Park is an important tourist and economic resource for Portrush, providing self catering facilities for holiday makers attracting business to the town. Notwithstanding the loss of the site as a tourist resource the land at Hilltop is physically detached from the SDL and would not make a logical inclusion to the settlement. As concluded in Section 1 of our report on the Plan Strategy and Framework, the Plan aims to protect such facilities from commercial development thereby placing them outside of the development limits. Accordingly we are satisfied that both sites should remain outside of the SDL for Portrush in order to protect the tourist asset provided by this land.
- 3.4.19 Objection 4922 seeks the inclusion of land along **Magheraboy Road (between Magheraboy Hotel and Maghermenagh Gardens)**. Planning permission C/2004/0952 was granted at appeal on this site for 44 dwellings in 2006. The land is immediately south of Housing Zoning PHH22 Hopefield West Magheraboy. This development is now built. Development also exists to the east and west of the site. Given the planning history on this site and the neighbouring development the inclusion of this land within the SDL

present a logical rounding off to the edge of the settlement. The planning permission demonstrates that 44 dwellings could satisfactorily be accommodated on the site development of this scale would not have a significant impact on the housing figures for Portrush. This is consistent with the Department's approach relating to other sites where planning permission has been granted since the publication of the plan. We therefore recommend the inclusion of this objection site within the SDL for housing.

- 3.4.20 Objection 4937 seeks the inclusion of land **south of Primrose Park** within the SDL as housing land. The site relates to a triangular plot of land bounded by development to the North West and the Magheraboy Road to the south. The site reads well with the urban form at this location and would make a logical inclusion within the SDL. The Department stated that given the width, alignment and presence of the adjacent road side property on the Magheraboy Road at this location that the provision of a safe pedestrian and vehicular access would be difficult. The NIHE and Department discounted the site for social housing because of the road safety concerns, its overall size and its location on the most southern peripheral area of the settlement. The objector stated at EIP that the density of dwellings could be restricted to 15 dph or that the site could be included as white land. Without a need for additional development land including for low density housing there is no justification for the inclusion of this site within the SDL.
- 3.4.21 Objection 4947 seeks the inclusion of a large area of land **west of Ballywillan Road** within the SDL for housing. The land is bounded to the north by existing housing at Castlevew and Hopefield Park. Ballywillan Road and Magheraboy Road bound the site to the north east and south respectively. The site is separated from the public road by existing dwellings, the Church car park and Ballywillan Cemetery. The inclusion of this land within the SDL would result in a massive expansion of the south east side of Portrush resulting in urban sprawl. There is no justification for land of this scale to be brought within the SDL.
- 3.4.22 Objection 4988 seeks the inclusion of an extensive area of land at **Skerries Holiday Park at Dunluce Road** for housing. We have already concluded in section one of our report, dealing with strategic issues (paragraph 1.3.62) that peripheral caravan parks should be left outside settlement limits. There are no site specific arguments that would persuade us to resile from that opinion. The inclusion of this land would result in a substantial expansion of Portrush. There is no justification for its inclusion within the SDL. This objection also sought the inclusion of a large site at **Loguestown, Glenmanus Park, Glenmanus Road** within the SDL for white land or holiday use. The identified site stretches from Glenmanus Road in the south east to Dhu Varren Park in the north and overlaps part of Hilltop Holiday Park. The objection was not supported by any evidence to substantiate such an extension to the settlement. The inclusion of this land for development would result in a massive expansion of Portrush to the south west that would be out of scale with the creation of a compact urban form. Accordingly we are satisfied that this land should remain outside the SDL.
- 3.4.23 Objection 5527 seeks the inclusion of some an extensive area of land north of **Magheraboy Road** as housing land, part of which the Department

identified as suitable to the social housing needs for Portrush. The site encompasses a number other objection sites in this area. The scale and size of this entire site would present a substantial expansion of the settlement to the south east, which would be disproportionate to the size of the settlement. Accordingly there is no need or justification for the inclusion of a site of this size within the SDL. However the NIHE suggested the inclusion of 1.1 hectare of land immediately south of Hopefield Park fronting housing site PHH21 onto Hopefield Road would provide a suitable option to accommodate 25 residential units to meet the needs for social housing. However, without any persuasive evidence to demonstrate that the objector or land owner would be willing to provide this part of their site for solely social housing we would not recommend the its inclusion within the SDL.

- 3.4.24 Objection site 5597 relates to land **at the front of Carrick Dhu Caravan Park** that should be included within the SDL. The objection site is small rectangular piece of green space along the road that provides a sense of openness to the entrance of the caravan park. We accept that if this area of land was within the SDL that it would come under pressure for frontage development that would impact on the openness of this coastal area. Accordingly we are satisfied that this land should remain outside the SDL.

Recommendations

- 3.4.25 **We recommend:**

- **The inclusion of objection site 4922 at Magheraboy Road within the SDL for housing.**

HOUSING ZONINGS

- 3.4.26 The main issues raised include:

- (a) Housing Zonings should be removed; and
- (b) The KSR should be amended or deleted.

Housing Zonings should be Removed

- 3.4.27 Objection 4767 seeks the removal of **Housing Zoning PHH12 36 Ballyreagh Road** from the Plan. Planning history on the site has involved the redevelopment of the former Causeway Hotel. A number of revised applications were submitted which have culminated in the hotel site being located at the western edge of the zoning. The remainder of the zoning has now been developed for housing. As the site is now committed and has been accounted there is no logic in removing the housing zoning from the Plan.
- 3.4.28 Objection 331 to Housing Zoning **PHH23 Rear of 48 to 51 Kerr Street** on the basis that KSR 3 states that "*the development of the site will require additional land to provide an access to a public road*" was unsubstantiated. Objections 4636, 4767 & 5597 seek the removal of this housing zoning from the Plan. The Department accepted that the development of this site

presents a number of difficulties as indicated by the KSRs. Given the restrictions to developing this site we accept that it is logical to remove this housing zoning from the Plan and that this would not compromise the delivery of housing growth for Portrush.

- 3.4.29 Objection 331 to Housing Zoning **PHH24 Castle Erin** on the basis that KSR 4 states that *“the development of the site will require additional land to provide an access to a public road”* was unsubstantiated. Objections 4636, 4746 & 5597 seek the removal of this housing zoning. The Department accepted that given that the immediate context of the zoning has changed since the publication of the Plan, the removal of this zoning would allow the overall area to be developed in a comprehensive manner. We accept that this would be a logical solution to the further development of this area and that the loss of this housing zoning would not compromise the delivery of housing growth for Portrush.
- 3.4.30 Objection 5762 seeks the removal of **Housing Zoning PHH30 100 Coleraine Road** and that the site is identified as a development opportunity site. Planning permission has been granted for a Lidl Store which now occupies this site. We are satisfied that there is no overriding need to zone this land as an opportunity site or for retail development. However we support the removal of Housing Zoning PHH30 from the Plan and accept that this will not significantly impact on the provision of housing for Portrush.

The KSR should be Amended or Deleted

- 3.4.31 Objection 331 to Housing Zoning **PHH25 Rear of Hopefield Crescent** on the basis that the KSR require *“the development of the site will require additional land to provide an access to a public road”* is unfounded and unsubstantiated.
- 3.4.32 Objection 331 to Housing Zoning **PHH26 Rear of 16-40 Portstewart Road** on the basis that KSR 3 states that *“the development of the site may require additional lands to provide an access from Portstewart Road”* was unsubstantiated. Access can be achieved from this land to Portstewart Road. The objector provided no evidence to suggest why access would not be achievable.
- 3.4.33 Objections 331 to Housing Zoning **PHH27 Glenbush, PHH28 11-19 Crocknamac Street, PHH29 Girona Avenue, PHH30 100 Coleraine Road, PHH31 55-57 Coleraine Road, PHH32 Port Centre, Glenmanus Road, PHH33 Rear of 20-26 Hopefield Road, PHH35 Glenmanus Village North, PTH36 Dhu Varren, PTH38 Causeway Street East and PHH40 21 Landsdowne Crescent** on the basis of their location and the restrictive nature of the KSR for the zonings were unsubstantiated.
- 3.4.34 Objection 331 to Housing Zoning **PHH34 1-3 Bath Terrace** on the basis on the strict KSR specifically KSR1 restricting development to a maximum of 19 dwellings, was unsubstantiated.
- 3.4.35 Objections 331 to Housing Zoning **PHH37 North West of Brookvale Terrace & PHH39 Causeway Street Rear of Filling Station** on the basis of

their location and respective KSR3 relating to the need for additional land to provide access were unsubstantiated.

Recommendations

3.4.36 **We recommend that:**

- **Housing Zoning PHH23 Rear of 48-51 Kerr Street is removed from the Plan.**
- **Housing Zoning PHH24 Castle Erin is removed from the Plan.**
- **Housing Zoning PHH30 100 Coleraine Road is removed from the Plan.**

APARTMENT DEVELOPMENT

3.4.37 Objections were received to Designation PHA01 Area of Opportunity for Apartments. This designation has been presented on Map 3/04b Portrush Town Centre. Policy relating to this designation was set out in Plan Strategy and Framework under Policy HOU3 Apartment Development in Settlement with Pressure for Second Homes.

3.4.38 Section 1 of our report on the Plan Strategy and Framework recommends deletion of Policy HOU3. As we do not support the use of this policy in the Plan we also consider that the Designations relating to this policy should also be deleted from the District Proposals in the Plan.

Recommendations

3.4.39 **We recommend:**

- **That Designation PHA01 Area of Opportunity for Apartment Development is deleted from the Plan.**

RECREATION, TOURISM AND OPEN SPACE

3.4.40 Portrush is provided for in terms of recreational and tourism facilities. The Plan seeks to identify existing and proposed foot path and cycle networks within the town. Major areas of open space are identified on Map 3/04a. These areas are subject to Regional Policy contained in PPS8.

3.4.41 The main issues raised include:

- (a) Land should be zoned for tourism;
- (b) Exclusion of holiday caravan parks from within the SDL;
- (c) Removal of built development from the area of open space; and
- (d) The status of Station Square

Land should be Zoned for Tourism

- 3.4.42 Objection 4767 seeks the removal of **Housing Zoning PHH12 36 Ballyreagh Road** and that it is replaced as a tourism development site. The objection has been made on the basis that Coleraine Borough Council sold this land so that it would be developed for tourism instead of housing. This assertion was not supported with any evidence. Nevertheless the Housing Zoning PHH12 is already committed and will provide up to 33 residential units for Portrush. Residential development has commenced on the site and there are proposals for the redevelopment of the Causeway Hotel. Notwithstanding the lack of evidence presented to substantiate this objection, the Plan has not zoned any land for tourism development. Accordingly the objection is not sustained.
- 3.4.43 Objection 4903 seeks the identification of land at **Ballycraig Farm** to be identified as an opportunity site to satisfy a tourism need. The objection also seeks the provision of specific policy relating to tourism opportunity sites including a need and design criteria to ensure appropriate and sustainable development. The objection site is located outside the SDL to the east of Portrush off the Ballymacrea Road. The site is not physically linked to the settlement and it would not be logical to consider zoning land for development in the countryside. No information was presented to demonstrate a need for a specific tourism zoning on this land. Regional policy contained within PPS21 and PPS16 deals with tourism development in the countryside. Accordingly the objection is not sustained.

Exclusion of Holiday Caravan Parks from within the SDL

- 3.4.44 Objection 4919 seeks the inclusion of **Hilltop Holiday Park** within the SDL for future redevelopment as a brown field site. We have already concluded in Section 1 of our report dealing with strategic issues (paragraph 1.3.62) that peripheral caravan parks should be left outside the SDL. There is no site specific arguments that would persuade use to resile from that opinion. According the objection is not sustained.
- 3.4.45 Objections 4988 seek the reinstatement of lands at **Louquestown, Glenmanus Park, Glenmanus Road, and lands at Skerries Holiday Park, Dunluce Road** within the SDL as white land or zoned for holiday use. Both sites are occupied by existing operational caravan parks. The holiday park at Dunluce Road is physically detached from the SDL. We have already concluded in Section 1 of our report dealing with strategic issues (paragraph 1.3.62) that peripheral caravan parks should be left outside the SDL. There is no site specific arguments that would persuade use to resile from that opinion. Accordingly the objection is not sustained.

Removal of Built Development from the Area of Open Space

- 3.4.46 Objections 5597 are to the identification of the existing built development at the **Recreation Grounds, Ramore and the former Civic Amenity facility off Causeway Street** as an Area of Existing Open Space on Map 3/04a. The buildings referred to by the Council are integral and are associated with the surrounding open space in the wider area. Their identification as Open Space

within the Plan is consistent with Regional policy contained in PPS8. The objections are not sustained.

The Status of Station Square

- 3.4.47 Objection 4767 & 5597 are to the identification of **Station Square** as a 'Target Site' which would infer that built development would be allowed. A public realm scheme has taken place and is now complete on this site since the publication of the Plan. The Department have agreed that the reference to this being a target site should be deleted from the Plan. We accept that this would be a logical update to the Plan.

Recommendations

- 3.4.48 **We recommend:**

- **The removal of the 'Target Site' from Station Square in the Plan.**

AREA OF ARCHAEOLOGICAL POTENTIAL

- 3.4.49 The Plan identifies an Area of Archaeological Potential for Portrush on map 3/04. As we explained in Section 1 of our report, Areas of Archaeological Potential (AAPs) are highlighted in the draft Plan for **information** purposes only. They are not a Plan designation. Consequently we are not in position to address any site specific objections made against this particular AAP or its inclusion on the map.

TOWN CENTRE

- 3.4.50 A town centre boundary for Portrush has been identified on Map 3/04b. The main issue raised by the objectors to Portrush Town Centre relate to its designation.
- 3.4.51 Objection 331 is to the inclusion of a number of development opportunity sites, properties requiring redevelopment or major refurbishment within the town centre. The objection did not refer to any specific sites. The objector argues that these sites may not become available but provided no evidence to substantiate these claims. Accordingly the objection is not sustained.
- 3.4.52 Objection 5572 to the town centre was unsubstantiated.

AREA OF TOWNSCAPE CHARACTER (ATC)

- 3.4.53 The Plan identifies an ATC for Portrush on Map 3/04 and identifies the key features of this area within section 9.0, page 137, Vol 2 of the Plan. The main issues raised by the objectors to the Portrush ATC include:
- (a) The ATC designation and its Key Features;
 - (b) Greater protection should be afforded to the ATC; and

- (c) The inclusion of land within the ATC.

The ATC designation and its Key Features

- 3.4.54 Objection 331 was made on the basis of the strict key features of the ATC that must be taken into account when assessing development proposals in this area. The Plan identifies 15 key features that are descriptive of the character of this area. The objector did not dispute any particular feature of the area or provide any evidence to substantiate the nature of their objection.
- 3.4.55 Objection 5572 to the ATC was unsubstantiated.

Greater protection should be afforded to the ATC in the Peninsula Area

- 3.4.56 Objection 4767 seeks that greater protection is afforded to ATC's within the Peninsula area and seeks the removal of paragraph 9.2 page 138 Vol 2 from the Plan. The objector did not provide any evidence to suggest how greater protection could be afforded to this area. As paragraph 9.2, page 138, Vol 2 of Plan reiterates Regional Policy contained in PPS6 Addendum Areas of Townscape Character we are not persuaded that it should be removed from the Plan.
- 3.4.57 Objection 5597 is to failure of the Plan to provide supplementary design guidance for the ATC designation and that the conversion of existing buildings to apartments is preferred to redevelopment. The Plan designates this ATC and Regional planning policy contained in PPS6 addendum addresses development in ATCs. We are not persuaded there is any need to have specific design guidance or amendment to the Plan following consideration of this objection.
- 3.4.58 Objection 5757 is to the lack of emphasis placed on the reuse of existing buildings. The proposed ATC has been drawn and designated to identify to affirm and add to the previous NEAP designation, where there are readily identifiable and consistent themes of townscape character which provide a context for any development proposal in this area. The Plan sets out 15 Key Features in this area to be taken into account. The objector did not present any persuasive evidence to justify why the reuse of the existing buildings in this area should be in preference to a new build development that would conform to the key features of the ATC. Existing regional policy also provides additional protection to maintain the character of this area. Accordingly the objection is not sustained.

The inclusion of Land within the ATC

- 3.4.59 Objection 5184 is to the inclusion of a small site at **68 Eglinton Street** immediately adjacent to the Metropole building. The site is occupied by an end terrace two storey town house. The Department stated this site falls within the boundary of a redevelopment proposal C/2006/0027/F, granted permission on 11 June 2007. To date this scheme has not been developed. The objector did not present any evidence to explain or substantiate why this site should be excluded from the ATC. The building shares similar characteristics to the other neighbouring properties and there are no

distinguishable features that set the building out from the adjacent properties within the ATC. Accordingly, we are not persuaded that the ATC boundary should be amended to exclude the objection site at this location.

HOT FOOD TAKE AWAYS

3.4.60 The Plan sets out Policy PH02 Portrush Town, Hot Food Takeaways in the Plan to restrict further Hot Food Take Aways on the Peninsula (the area of land north of Crocknamac Road). This policy is consistent with Policy RC3 of the Portrush Alteration to the NEAP. The main issues include:

- (a) The policy is too strict; and
- (b) The area of restraint should be amended.

The Policy is too Strict

3.4.61 Objection 331 is to the strict policy completely banning the development of hot food takeaways on the Peninsula. The objection suggests that the policy should set out some Key Site Requirements for the development of fast food outlets but failed to explain or substantiate such an amendment to the policy. Accordingly the objection is not sustained.

The Area of Restraint should be Amended

3.4.62 Objections 4767 & 5597 both seek that the areas of restriction on hot food take always should be extended to the 30 mph restricted area. Objection 5597 also added that they should be restricted to local centres only. The aim of the policy is to control the effect of hot food take aways on the 'image' of the peninsula area. The 30 mph limit covers an extensive town area in Portrush and restricting this entire area would be excessive and unnecessary when other prevailing planning consideration associated with hot food take aways already apply. Likewise such a policy is not necessary for Local Centres. Accordingly both objections are not sustained and the policy should remain unchanged.

AMUSEMENT ARCADES

3.4.63 The Plan sets outs Policy PH03 Portrush Town, Amusement Arcades in the Plan to restrict further amusement arcades in the Peninsula. This policy is consistent with Policy RC2 of the Portrush Alteration to the NEAP. The main issues include:

- (a) The policy is too strict; and
- (b) The area of restraint should be amended.

The Policy is too Strict

3.4.64 Objection 331 to the strict policy completely banning the development of further amusement arcades on the Peninsula. The objection suggests that the policy should set out some Key Site Requirements for the development of

amusement arcades but failed to explain or substantiate such an amendment to the policy. Accordingly the objection is not sustained.

The Area of Restraint should be Amended

- 3.4.65 Objection 4767 seeks that the area of restriction on for amusement arcades should be extended to the 30 mph restricted area. The 30 mph limit covers an extensive town area in Portrush and restricting this entire area would be excessive and unnecessary. The objection did not provide any persuasive evidence to demonstrate why this area should be expanded beyond the Peninsula. The objection is not sustained.

SUBDIVISION OF FAMILY ACCOMMODATION

- 3.4.66 Policy PH04 Portrush Town, Sub Division of Family Accommodation is set out to protect the established residential character of Causeway Street, Hamilton Place and Coastguard Cottages. The main issue relate to the restrictive nature of the policy.
- 3.4.67 Objection 331 to the restrictive nature of the policy was made on the basis that the sub division of the properties in the areas which the policy applies would limit the supply of affordable housing in Portrush. No evidence was presented to substantiate these claims. Accordingly the objection is not sustained.

RETAIL, SERVICES AND OFFICES

- 3.4.68 The Plan sets out Commercial Designation PHLC01 Coleraine Road Local Centre on Map 3/04a. The main issue to this designation relates to the provision of parking at Hillcrest.
- 3.4.69 Objection 4676 was to the inadequate car parking provision at Hillcrest. The objector provided no evidence to substantiate their claims. The Department stated that Hillcrest is an established local centre which gained approval for five retail units in June 2003, where an approved parking layout was conditional on that approval. Accordingly the objection is not sustained.
- 3.4.70 Objection 331 to the designation was unsubstantiated.

LOCAL LANDSCAPE POLICY AREAS (LLPAs)

- 3.4.71 The Plan designates four LLPAs in and around Portrush. The main issues raised include:
- (a) The designation of LLPAs;
 - (b) The inclusion of land within a LLPA designation; and
 - (c) Omission of reference to the emerging strategy for the regeneration of Portrush.

The Designation of LLPA

- 3.4.72 Objections 331 to Designations **PHL01 Ramore Head LLPA, PHL02 West Bay LLPA, PHL03 Metropole LLPA and PHL04 Royal Portrush LLPA** questioned the need for these strict designations when there are AONB and Open Space designations in place on these designations. LLPA designations are set out in the Plan in accordance with Regional Policy contained in PPS6 and in accordance with the terms of Policy ENV2 in Volume 1 of the Plan. The designations have been set out to provide an additional degree of control for these sensitive areas. The objector provided no evidence to substantiate why these areas should not be designated as LLPAs. Accordingly the objections are not sustained.
- 3.4.73 Objections 331 to new policy designations on land situated along the **Coastline and around Ramore Head** were not to any specific designation or substantiated with any evidence to explain the reason for the objection.

The inclusion of Land within a LLPA Designation

- 3.4.74 Objections 4530, 4532 & 4533 seek the amendment of the boundary of Designation **PHL02 West Bay LLPA** to exclude land behind **immediately west and including garden of West Strand House, Castle Erin Road**. None of the objectors provided a map to show the extent of the objection site or evidence to substantiate why this area should not be included within the LLPA. Accordingly these objections are not sustained.
- 3.4.75 Objection 4531 seeks the amendment of the boundary of Designation **PHL02 West Bay LLPA** to exclude land **immediately west off 'Over the Waves' Castle Erin Road**. The objection seeks that the boundary of the LLPA stops at the Promenade Edge excluding the garden of 'Over the Waves' and West Strand House garden. No evidence was presented to substantiate why this land should not be included within the LLPA designation. Accordingly the objection is not sustained.
- 3.4.76 Objection 4911 and 4984 seek the removal of land **along Castle Erin Road**, objection 4960 seeks the removal of **West Strand House and objection 4963 seeks the removal of the part of Kiddi Land** from Designation **PHL02 West Bay LLPA**. All of the objections propose that the LLPA boundary runs along the back of the West Strand Promenade. None of the objectors provided persuasive evidence to explain or substantiate why the boundary should be amended or why this land should be excluded from the LLPA. The area of land to which these objection site relate comprise a steep sloping grass embankment which is an area of 'raised beach', a characteristic landscape and geological feature of the beach systems in this area. This area provides an important backdrop to the setting of West Strand. At present the area has limited built development. The lack of development allows extensive open views of the sea and coastline beyond. The LLPA designation does not restrict appropriate modest, modifications to these buildings, as such the LLPA designation will protect these important views and protect this area from over development that could interfere with these view looking out of the settlement. We are not persuaded that the LLPA should be amended and are satisfied that the land in this area meets the

criteria for designating the LLPA PHL02. We accept that this area should remain within the LLPA designation to afford the appropriate level of protection to the setting of Portrush at this location.

Omission of reference to the Emerging Strategy for the Regeneration of Portrush

- 3.4.77 Objections 5597 to the omission of reference to the emerging strategy for the regeneration of Portrush by the Portrush Regeneration Group within the LLPA Designations at **PHL01 Ramone Head LLPA, PHL02 West Bay & PHL03 Metropole**. To take account of the objectors concerns relating to the supporting text of Designation PHL01 Ramone Head LLPA the Department proposed the rewording of paragraph 16.2 to states:

“The Department will give favourable consideration to appropriately sited buildings for uses ancillary to the enjoyment of open space and existing recreational facilities”

We accept that this is a satisfactory amendment and allows for appropriate development to facilitate any regeneration in this area. In respect of PHL03 Metropole LLPA the Department proposed to remove reference to the word “buildings” from paragraph 16.4. We do not consider this necessary. This LLPA is sited within the town where buildings would be expected. We are satisfied no amendment is necessary to paragraph 14.4. The objector did not substantiate his objection with supporting information relating to the emerging strategy for the Regeneration of Portrush or with any evidence relating to PHL03 West Bay LLPA. However we are satisfied that the amendment as proposed by the Department will not restrict the future regeneration of the town.

Recommendations:

- 3.4.78 **We recommend:**

- **The amendment of paragraph 16.2, page 142, Volume 2 of the Plan to state the following “*The Department will give favourable consideration to appropriately sited buildings for uses ancillary to the enjoyment of open space and existing recreational facilities*”.**

3.5 PORTSTEWART

3.5.1 Portstewart has been designated as one of four towns in the Coleraine District. This reaffirms its status as a town. The Settlement Development Limit (SDL) for Portstewart are identified on Map 3/05a.

Plan Provision for Housing

3.5.2 Taking account of the 2008 HGI revisions for Coleraine District the draft Plan makes provision for 1183 housing units in Portstewart. Between January 1999 and August 2010 some 1117 housing units were completed. The housing Up-date Paper March 2011 estimated that there is a surplus of 1069 units (90.4%) remaining in Portstewart.

3.5.3 Since the publication of the Plan there have been a number of planning approvals granted. These include:

- 200 dwellings between Knocknacor Drive and Dunsuivinish Avenue, South of Station Road (Objection sites NAP 329 & 5527 and part of Objection sites 5179 & 4885)
- 22 dwellings at Lisderg (Objection sites 331, 4918 & 5704)
- Land east of Lissadell Avenue (Objection sites 331 & 4885)
- Land at Coleraine Road, Tesco Site (Objection sites 5192 & 5335)

3.5.4 The Department has stated that the SDL would be amended to incorporate these sites and that the sites would be zoned for housing where appropriate.

Social Housing

3.5.5 The updated (March 2011) Housing Need Assessment figures indicated a substantial increase in social housing need for Portstewart, of some 95 residential units for the next 7 year period (2011 – 2018). To assist the delivery of these sites the Department accepted that this need could be met using land outside the SDL and that the inclusion of such land within the SDL would be subject to a KSR that this housing land must be used to meet the social housing needs of Portstewart. Since the publication of the Plan both NIHE and the Department have been working together using set criteria to best identify how to meet the social housing need for Portstewart. At the EIP four potential sites were identified as follows in order of the Departments preference:

- Site 1 Land at Lissadell Avenue/Cappaghbeg – objection 331
- Site 2 Land at Cappaghmore adjacent to PTH27 – objections 4706 & 4984
- Site 3 Land at Meadow Lands – objections 4952 & 5704
- Site 4 Land at Lisadell Gardens – objection 4983

3.5.6 Strategic Policy relating to meeting social housing need in the Plan area is addressed within Policy HOU5 Meeting Community Housing Needs. Section 1 of our report concludes that while these sites have been identified jointly by the Department and NIHE, we will only give consideration to the inclusion of land solely for social housing where there is a clear willingness on behalf of

the objector to accommodate such social housing on their land and where we are satisfied that there are sound physical planning reasons for the inclusion of that land within the SDL. Three out of four the above sites were subject to the written representation procedure. The Department and NIHE accepted that the social housing requirements could be met with the inclusion of Sites 1 and 2. Consequently whilst sites 3 and 4 were identified by the Department there is no social housing need to justify the inclusion of Sites 3 and 4. Site 2 was the only site which had a representation under objection 4984 present at the EIP, where it was expressed that the objection site could be made available to contribute to the social housing need for Portstewart. We can therefore only consider Site 2 as a possible option towards meeting the social housing need.

Settlement Development Limits (SDL)

- 3.5.7 We concluded in section one of the report that there is no strategic need to allocate further housing land in Portstewart. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of the report, any extension of the SDL will only be considered where there is are very specific social housing needs identified, or there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Portstewart. Our assessment of the objections is as follows:
- 3.5.8 Objection 4 relates to a large area of land at **Galvally off Mill Road**. The objection site abuts the proposed SDL to the west along the rear of Lisadell Gardens and to the east along the boundary with Dunsuivnish Avenue and comprises some five fields. Whilst it abuts the settlement to the east and west it does not sit within the urban context to the north. The inclusion of this site by itself would not result in the creation of a compact urban form. Access to the site would have to be through existing housing and would increase the impact of the existing housing in the area. Given the overall scale and size of the size we would not support its inclusion within the SDL.
- 3.5.9 Objections 329, 331, 5527 and part of 5179 relate to land **between Knocknacor Drive and Dunsuivnish Avenue along Station Road**. As noted above planning permission has been granted for 200 dwellings (C/2008/0327/F) in August 2009. The Department has confirmed that the SDL for Portstewart should be amended to incorporate this site. We accept that this is logical given the planning permission for housing on the site.
- 3.5.10 Objection site 331 labelled as '1' located to the east side of **Lissadell Avenue** was identified by the Department as their first preference in meeting the social housing need for Portstewart. The inclusion of the portion of the objection site as identified by the NIHE and the Department would make a logical rounding off to the edge of the settlement especially in the context of the approved housing land to the north of Housing Zoning PTH25. This site

would assist the delivery of a small scale social housing scheme in the mix of other residential site. However, we have already concluded in paragraph 3.5.6 above that we cannot support the use of this site to meet the shortfall in social housing provision. Given the general over provision of housing land within the SDL we do not support the inclusion of this within the SDL.

- 3.5.11 Objections 331 (land labelled '1') and 4918 seek the inclusion of lands at **'Lisderg' adjacent to Meadow Gardens, 109 Station Road** within the SDL. Planning permission (C/2005/0296/O) has been granted on this site for housing development. As noted already the Department wishes to include this site within the SDL given the planning permission for housing on the land. The north east half of the site lies within the proposed LLPA designation PTL05 Rockview. At the EIP the Department also stated that they would like to remove this part of the site from the LLPA. We accept that these recommendations are logical amendments to the Plan.
- 3.5.12 Objection 331 seeks the inclusion of land **east of Lisadell Avenue** within the SDL and objection 4885 seeks that the Plan recognises that planning permission for housing has been granted on this site. Planning permission (2003/A497 & C/2009/0706/F) has been granted on this site for housing development on land adjacent to Lisadell Avenue. As noted above the Department wishes to include this site within the SDL given its planning history. The site lies within the proposed LLPA designation PTL01 Cromore. At the EIP the Department also stated that this part of the site should be removed from the LLPA at Cromore. We accept that these recommendations are logical amendments to the Plan.
- 3.5.13 Objections 331, 5192, 5335 and 5496 seek the inclusion of land **south of Agherton Village, Coleraine Road** within the SDL. A Tesco Retail store occupies the site. The site sits into the existing urban form at this location and it is logical that it should be included within the SDL.
- 3.5.14 Objections 331 seek the inclusion of land labelled '2' which relates to a large portion of land between **Lisadell Avenue and Dunsuivinish Avenue** and land labelled '3' which relate to land to the **rear of Millbank Avenue**. No evidence was presented to substantiate why this land should be included within the SDL.
- 3.5.15 Objections 4572 & 4885 relate to land between **Station Road, the Bridle Path (formerly the Old Coach Road) and Lisadell Avenue**. As noted above the north east portion of objection sites fronting onto Station Road has the benefit of planning permission and the Department has recommended that it should be brought within the SDL. The site also overlaps Housing Zoning PTH24. The remaining part of the site falls within the proposed LLPA Designation PTL01 Cromore. The entire objection site relates to some 50.5 hectares. The inclusion of this entire site would give rise to a significant expansion to the settlement at this location resulting in urban sprawl that would threaten the setting of Portstewart.
- 3.5.16 Objection site 4708 relates to land **south of Cromlech Park and east of Housing Zoning PTH27 Coleraine Road**. The objection site comprises two fields to be made available for social and affordable housing. Objection 5527

also seeks the inclusion of this land but extends the site further to include land to the south and east. Objection site 4984 seeks the inclusion of one field relating to some 3.4 hectares of land at **Coleraine Road east of Housing Zoning PTH27** for housing. The Department, NIHE and the objector have presented this site as being a suitable option to meet part of the social housing needs in Portstewart. The objection site comprises one field located to the rear of Cromlech Park and Court, behind Housing Zoning PTH27. Development has commenced on Housing Zoning PTH27, but is not complete. The site is close to the main road, local service, and would lie into the urban form. Access can be achieved onto the Coleraine Road via the adjacent housing zoning. The site could yield up to 85 residential units at 25 dph. The objector stated at the EIP that this land could be made available for social housing. There are no environmental constraints that would restrict the development of this site. Accordingly objection site 4983, part of objection sites 4708 and 5527 should be included within the SDL for Social Housing. The Department should specify KSRs to ensure the delivery of this land for only social housing.

- 3.5.17 Objection 4841 relates to land South of **Housing Zoning PTH26 off Agherton Drive, Cappaghmore** within the SDL for residential development. The site comprises around 4 large fields separated in the middle by Agherton Lane. The location, scale and overall size of the site would result in a large expansion to the south of the settlement. If this land were included it would give rise to the appearance of urban sprawl. Roads Service stated that the development would require major infrastructural works in order to provide a safe access. Accordingly we are satisfied that this land should remain outside the SDL.
- 3.5.18 Objection 4853 relates to **land North East of Housing Zoning PTH22 Station Road**. Housing development has commenced on Housing Zoning PTH22. The objection site as shown on the map appears as a logical rounding of the edge of the settlement that would sit within the context of the adjacent housing land. However on the ground the inclusion of this site would result in development across Millburn Stream that defines the northern boundary of the adjacent housing zoning. The Department has confirmed that the majority of the site would therefore be subject to flooding and has limited opportunity for public access. The site is also located within the proposed LLPA designation PTL05 Rockview, which aims to protect the rising landscape in this area which is important in defining the edge of Portstewart to the east. The objector provided no persuasive evidence to suggest why this land should be included within the SDL. Given the site constraints we support the exclusion of this land from the SDL.
- 3.5.19 Objection 4887 relates to land **west of Meadowlands** within the SDL for housing. The site is a triangular plot of land located on low lying land to the south west of the settlement. The golf course maintenance yard, including buildings, is located to the northern part of the site. The remaining part of the site is relatively flat with small poorly vegetated boundaries. Owing to the golf course the surrounding area is open and exposed. The inclusion of the objection site within the SDL at this location would extend the settlement further into the countryside beyond the neighbouring urban form giving rise to the appearance of urban sprawl at this location. The site would also

encroach on the proposed LLPA Designation PTL09 Portstewart Golf Course which forms an important part of the setting of the settlement to the south west. Given the physical and environmental constraints relating to this site we accept there is no overriding justification for its inclusion within the SDL.

- 3.5.20 Objection 4952 relates to some 6.2 hectares of land **south east of Meadowlands**. The objection site comprises three large fields, one of which is occupied by a farm dwelling and associated outbuildings. Part of this site was indicated by the Department as suitable for social housing. However the Department confirmed that it was not needed on the basis that their identified Sites 1 and 2 could meet the requirements. To the north of the site the Plan has identified an archaeological monument that would have to be taken in account if the site were developed. However, the inclusion of this entire site would represent a significant expansion to the south west of the settlement. The objection site should remain outside the SDL.
- 3.5.21 Objection 4958 relates to some 3 hectares of land to the **rear of the Cemetery Coleraine Road**. The site forms a relatively flat triangular plot set back from the Coleraine Road, via a laneway which runs to the southern boundary of the Cemetery. The Cemetery has not been included within the SDL. Irrespective of the development on the opposite side of Coleraine Road and its distance and location to the towns services, development on the objection site would not sit compactly with the urban form at this location and would give rise to the appearance of urban sprawl to the south west of the settlement. The objection site should remain outside the SDL.
- 3.5.22 Objection 4959 relates to some 3 hectares of land at **Agherton Land/Coleraine Road, Cappaghmore**. The site fronts onto Coleraine Road and wraps around objection site 4984. By itself it does not sit compactly into the urban form. The site fronts onto Coleraine Road and development on this land would further extend the settlement to the south along Coleraine Road, bringing the settlement closer to Coleraine. Whilst we acknowledge that objection site 4984 is suitable for social housing and that this objection site could be integrated into that social housing site. Both sites together would result in a large expansion of the settlement at this location. This would not achieve the NIHE objective of providing balance communities within small scale social housing sites. At the EIP the objector stated that they were not necessarily seeking social housing on the objection site, but failed to provide persuasive evidence to demonstrate a need for this land to be included within the SDL. Irrespective of the location of the site within close proximity to the surrounding town services, given this lack of need, combined with the failure of the site to provide a compact urban form along Coleraine Road, we recommend that this land remains outside the SDL.
- 3.5.23 Objection 4972 relates to some 2 hectares of land along **Agherton Road**. The objection site relates to a single field. The eastern portion of the site is on rising ground that falls away from the road site. The field boundaries are mainly defined by hawthorn hedgerows and with a road frontage boundary of some 140 metres. At this location Agherton Lane running to the immediate south of Housing Zoning PTH26 and provides a strong defining physical boundary to this southern part of the settlement. The site is a plot width from Agherton Lane and is physically detached from the SDL. Its inclusion within

the SDL would be illogical as this would not result in a compact urban form at this location. Accordingly this site should remain outside the SDL.

- 3.5.24 Objection 4980 relates to some 5.8 hectares of land at **Galvally, off Mill Road**. The objection is also to the failure of the Plan to designate this land for housing. Objection 4984 also seeks the inclusion of a slightly smaller part of objection site 4980, relating to 2 fields which comprise 4.1 hectares. Objection site 5179 seeks the inclusion of 14 hectares of land in this area, overlapping objection sites 4980, 4984 and the approved housing land C/2008/0327/F. All of the sites are on land immediately north of objection 4 and immediately south of Housing Zoning PTH24. The boundary to the south of this site is strongly defined. The land is also within the proposed LLPA designation PTL01 Cromore. The northern part of the objection sites to the rear of Rockland Drive and Gardens is part of the site approved under C/2008/0372/F. At the EIP the Department agreed that this area would now be brought within the SDL. We accept that this is logical given the planning permission to develop housing on the site. Given this planning approval to the north and the planning permission (C/2005/0372/F) for 200 dwellings on the land to the east also to be brought with the SDL, the inclusion of the objection site would sit neatly into the urban form in this area. We accept that appropriate measures could be put in place to protect any archaeological features in the area and that appropriate access design could be put in place to ensure safe access to the site. However, the inclusion of either objection sites of the proposed scale and size could yield up to another 145 dwellings (4980), 102 dwellings (4984) or 350 dwelling (5179) at a density of 25 dph. All of the sites as proposed are too large to meet the NIHE objectives for social housing of providing balanced communities on small sites throughout the town. NIHE also stated that the environmental sensitivities of the site relating to the archaeological features would be a factor that would lessen the potential of this site for social housing. With exception to the area of land that falls within Planning Approval C/2008/0372/F, there is no strategic need for the remaining part of the objection sites to be included with in the SDL.
- 3.5.25 Objection 5192 relates to a small site at **Strand Road**. The site lies between Strand Cottages to the north and 110 Strand Road to the west and mainly comprises rear garden areas of the roadside properties on approach to the entrance of Portstewart Strand. The north boundary of the site is delineated by the public footpath that leads pedestrians from the town to the beach. It is considered to form part of the coastal zone. Whilst the site is not within the proposed LLPA designation PTL07 Strand Head, it provides a level of openness when viewed from the beach. The objector did not express what type of development they would envisage on the site. Nonetheless in order to protect the setting of the settlement and the sense of openness when viewed from the pathway and beach this area should be free from any unnecessary development. Accordingly the site should remain outside the SDL.
- 3.5.26 Objection 5318 relates to land at **Rockview Lane**. The objection site comprises some 5-6 fields to the east of Meadow Park/Gardens and Galvally Road. The land at this location rises up gentle and provides a soft edge to the SDL. The objector presented no evidence to substantiate the objection.

Accordingly the objection site should not be included within the SDL for housing.

Recommendations

3.5.27 We recommend:

- **The inclusion of objection site NAP 329, 331, 5527 and part of objection site 5179 should be included within the SDL for Portstewart in accordance with the site boundary as approved under C/2008/0327/F.**
- **Objection site 331 & 4918 on land at ‘Lisderg’ adjacent to Meadow Gardens, 109 Station Road should be included within the SDL and removed from the proposed LLPA Designation PTL05 Rockview.**
- **Objection site 331 to the east of Lisadell Avenue should be included within the SDL and removed from the proposed LLPA Designation PTL01 Cromore.**
- **That the Tesco Retail Site south of Agherton Village should be included within the SDL.**
- **Objection site 4984, part of 4708 and 5527 on land at Coleraine Road east of Housing Zoning PTH27 should be included within the SDL for Social Housing. The Department should specify KSR to ensure the delivery of social housing.**
- **That the SDL should reflect the boundary of Planning Approval C/2008/0372/F at Housing Zoning PTH24 Rockland Gardens.**

HOUSING ZONINGS

3.5.28 The main issues include:

- (a) Housing Zonings should be removed; and
- (b) The KSR should be amended or deleted.

Housing Zonings should be Removed

3.5.29 Objection 4563 relates to **Housing Zoning PTH25 Aghermore East** on the basis that development on this land will set up parcels of land for future infilling and that housing allocations should avoid this problem. Residential development on this site has been developed. The objector did not justify what problem infilling development around this site would result from the housing allocation on this land. The objection is not sustained.

3.5.30 Objection 331 to **Housing Zoning PTH28 Central Avenue West** on the basis of its location. Since no further explanation or reasoning was provided, we cannot consider this matter further.

- 3.5.31 Objection 5672 is to **Housing Zoning PTH39 adjoining 5 Kinora Terrace** on the basis that this area constitutes part of the area of open space. The area is also within the proposed Designation PTL02 Portstewart Point. On the ground the area is a car parking area with a Council recycling facility, which is wrapped around by the public road. The site itself does not have any particular open space amenity value worthy of protecting unlike the surrounding green open space and coastal area. We are not persuaded that the housing zoning should be removed on the basis of the open space value of the site.

The KSR should be Amended or Deleted

- 3.5.32 Objection 331 to **Housing Zoning PTH29 Rear of 44 to 50 Coleraine Road** on the basis that KSR 4 which states that "*the development of the site will require additional land to provide an access to a public road*" was unsubstantiated. Planning permission C/2006/0417/F for housing development has been granted and is now built on this site. Objection 4843 to KSR1 of this zoning was on the basis that higher density incorporating apartment development could be achieved on the site. The site is a small site within the surrounding context of a mix of residential size including semi-detached, terrace and detached houses. The Department stated that Planning Permission (C/2008/0808/F) has been secured on an enlarged site incorporating this zoning and land fronting Coleraine Road. The objector presented no additional persuasive evidence to amend KSR1. Accordingly we do not consider we need to amend this in the plan following our consideration of these objections.
- 3.5.33 Objections 331 to **Housing Zonings PTH30 12 to 14 Seaview Drive North, PTH31 Nursery Avenue, PTH32 Adjoining 1 Strand Road, PTH33 Adjoining 15 The Crescent, PTH34 8 The Promenade, PTH35 9-10 The Promenade, PTH36 North of Stuart Gardens, PTH37 3 The Hill, PTH38 West of Old Coach Road/The Hill, PTH39 Adjoining 5 Kinora Terrace, PTH40 Rear of 18 to 26 Coleraine Road, PTH41 4 High Street, PTH42 1 High Road, PTH43 8 Coleraine Road, PTH44 1 to 6 Stuarts Gardens, PTH45 East of Garden Avenue, PTH46 West of Convention Avenue, PTH47 4 to 7 The Promenade, PTH48 Strandview and PTH49 off Burnside Road** on the basis of their location and the restrictive nature of the KSR for the zonings were unsubstantiated.
- 3.5.34 Objection 331 to **Housing Zoning PTH38 West of Old Coach Road/The Hill** on the basis that KSR 4 which states that "*the development of the site may require additional lands to provide an access to a public road*" was unsubstantiated. This site fronts onto Old Coach Road, the objectors claims regarding the availability of additional land to achieve safe access to the site were unexplained and unsubstantiated.
- 3.5.35 Objection 331 to **Housing Zoning PTH40 Rear of 18 to 26 Coleraine Road** on the basis that KSR 3 which states that "*the development of the site may require additional lands to provide an access to a public road*" was unsubstantiated. Development has been carried out on this site.

- 3.5.36 Objections 331 to KSR4 of **Housing Zoning PTH47 4 to 7 The Promenade** and to KSR 6 of **Housing Zoning PTH48 Strandview** were unexplained and unsubstantiated.
- 3.5.37 Objection 4838 is to the KSR1, 2, 4 & 5 relating to **Housing Zoning PTH48 Strandview**. The housing zoning falls outside the town centre for Portstewart but is central elevated site overlooking the strand in the central town area. The site is vacant set within the context of medium to low density residential development. A small portion of the Housing Zoning is overlapped by the proposed LLPA designation PTL11. KSR 1 specifies a housing density range of 12-18 dwellings per hectare. The objector considers this to be abnormally low and that a scheme could deliver a higher density and enhance the character of the area. The objector failed to suggest what would be an appropriate density on the site. The Department stated in their evidence that a current planning application (C/2011/0311/F) for 47 dwellings on 2.1 hectares of the site was with the Department for determination. This equated to 22 dph, such a density would be in keeping with the surrounding residential context. We are not persuaded that KSR 1 should be amended to allow for higher density on this site. KSR2 states that dwellings shall not be greater than two storeys in height to ensure the character of the area is respected. The objector seeks that this is amended to 'generally not be more than 2 storeys in height'. Given the site location within the context of surrounding two storey properties and on an elevated site, we are not persuaded that KSR2 should be relaxed. The matters relating to KSR4 which notes that the junction of Strandview Drive and/or Strandview Avenue may need an upgrade, is a matter to be demonstrated through a development proposal. The LLPA designation PTL11 Strandview has been designated to afford acknowledgement of the landscape importance of this hill top by ensuring it forms part of an area of open space for the housing zoning. We are not persuaded there is a need to amend the boundaries of the LLPA. Accordingly we are not persuaded that KSR 1, 2, 4 and 5 need any amendment.
- 3.5.38 Objections 5484 & 5494 all relate to the KSR of Housing Zoning **PTH49 off Burnside Road**. Objection 331 was specifically to KSR4. None of the objectors provided any evidence to substantiate or explain how or why the KSR should be amended. Furthermore we note residential development is already built on this site. Accordingly these objections are not sustained.

APARTMENT DEVELOPMENT

- 3.5.39 Objections were received to Designation PTA01 Area of Opportunity for Apartments. This designation has been presented on Map 3/05a Portstewart. Policy relating to this designation was set out in Plan Strategy and Framework under Policy HOU3 Apartment Development in Settlement with Pressure for Second Homes.
- 3.5.40 Section 1 of our report on the Plan Strategy and Framework recommends deletion of Policy HOU3. As we do not support the use of this policy in the Plan we also consider that the Designations relating to this policy should also be deleted from the District Proposals in the Plan.

Recommendations

3.5.41 **We recommend:**

- **That Designation PTA01 Area of Opportunity for Apartment Development is deleted from the Plan.**

RECREATION, TOURISM AND OPEN SPACE

3.5.42 Portstewart is well provided for in terms of recreational and tourism facilities. Major areas of open space are identified on Map 3/05a. These areas are subject to Regional Policy contained in PPS8. The main issues relate to:

- (a) Land zoned as open space; and
- (b) Land should be identified as a tourism opportunity site;

Land Zoned as Open Space

3.5.43 Objection 4661 relates to the designation of an area of major open space at the **Dominican College** on the basis that this could compromise the schools ability to redevelop in the future, given educational use has been established on the site since 1917. The Plan has identified major areas of open space for information purposes therefore irrespective of this identification in the Plan the playing fields adjoining the school constitute open space of public value as set out in Annex A of PPS8. The redevelopment of this land would therefore be subject to the regional policy contained within PPS8. No further information was provided to substantiate the objection. Accordingly it is not sustained.

3.5.44 Objection 5597 is to the failure of the Plan to identify an existing green link between open space at Mill Road and Mullaghcall Playing Fields as existing open space. The Department accept that this link should be identified on the Plan for information purposes. We accept that this is a logical inclusion on Map 3/05a.

Land should be identified as a Tourism Opportunity Site

3.5.45 Objection 5495 seeks the inclusion of some 36 hectares of land at **Agherton Road** to be included within the SDL for tourism development. The land is detached from the SDL of Portstewart. The site extends east to Cromore Road and includes a number of dwellings, Ballyleese Caravan Park and farmland. Notwithstanding the settlement pattern issues relating to the site, no persuasive evidence was presented to demonstrate need for its inclusion in Portstewart. Regional policy exists to address the tourism potential of land in the countryside. The inclusion of land of this scale would give rise to a significant expansion of the SDL out of keeping with the scale and character of the settlement. Accordingly we are satisfied that this site should remain outside the SDL.

- 3.5.46 Objection 5600 relates to 5 hectare of land at **Ballyreagh Road** and seeks that this land is designated as suitable for tourism or tourism related development such as a holiday village complex. The land is between Portrush and Portstewart to the rear of the North West 200 Pits area. To the east the site abuts Juniper Hill Caravan Park; to the south the small pocket of development know at Ballygelagh Village and to the west it is bounded by another field between the site and the built edge of Portstewart. This area of land provides an important physical and visual break between Portrush and Portstewart which should be retained free from any unnecessary development. The objector did not provide any persuasive over riding case of need to support tourism development on this land. The Tourism Strategy was withdrawn from the Plan to be replaced by the PPS16 which is now published (2013). Regional policy now exists to address tourism development in the countryside. We are therefore not persuaded that this land should be identified as a tourism opportunity site or tourism related site.

Recommendations

- 3.5.47 **We recommend:**

- **That Map 3/05a illustrates the existing green link between the open space at Mill Road and Mullaghcall Playing fields as an area of existing open space**

TOWN CENTRE

- 3.5.48 A town centre boundary for Portstewart has been identified on Map 3/05b. The main issues relate to the designation of the Town Centre.
- 3.5.49 Objection 331 is to the inclusion of a number of development opportunity sites, properties requiring redevelopment or major refurbishment within the town centre. The objection did not refer to any specific sites but argued that these sites may not become available but provided no supportive evidence to substantiate this. Accordingly the objection is not sustained.
- 3.5.50 Objections 4985 and 5572 were to the town centre designation. Both objections were unsubstantiated.

THE PROMENADE AND SHOP-FRONT DESIGN

- 3.5.51 The Plan recognises the importance of Portstewart Promenade and Shop Fronts. It sets out policy to control the height, scale, proportions and rhythm of the street frontage and the standard of shop fronts. The main issues raised include:
- a) The Promenade Designation and Failure to Designate an ATC;
 - b) The Policy relating to the Promenade Designation; and
 - c) The Design Principles for Portstewart Town Shop Fronts.

The Promenade Designation and Failure to Designate an ATC

- 3.5.52 Objection 331 was to the Promenade designation. No evidence was presented to substantiate or justify any reasoning for the objection.
- 3.5.53 Objections 4583, 4767, 5584 & 5597 were all on the basis that no there is no ATC designation in Portstewart and that the housing area at Harryville and Central Avenue should be afforded such protection. The objectors did not provide any map to indicate the area or provide a list what should be considered as the key features worthy of an ATC designation for this area. However, at the EIP the Department identified two separate areas at Harryville and along Central Avenue where it was considered that two separate areas warranted an ATC designation. In respect the proposed ATC designations at Harryville and Central Avenue we are not persuaded that the characteristics of either of these road side properties of themselves warrant a specific ATC Designation. The character, scale, design and features of these terraces already benefit from protection under existing Regional Policy contained in PPS 7 and the addendum to PPS7. We are satisfied that no extra policy weight should be afforded to these properties at Harryville and Central Avenue.

The Policy relating to the Promenade Designation

- 3.5.54 Objection 331 was made on the basis that Policy PTP 02 The Promenade would only halt and stifle the properties along the Promenade. No evidence was presented to substantiate or explain the objection.
- 3.5.55 Objection 4408 seeks that policy contain a building height restriction along the Promenade. The head note relating to Policy PTP02 states that “*redevelopment proposals will not be permitted unless they respect the height, scale, proportions and rhythm of the street frontage*”. Height is therefore a consideration in this area linking any redevelopment proposal to its surrounding context. We are satisfied that an arbitrary height restriction does not need to be included in this policy.

The Design Principles for Portstewart Town Shop Fronts

- 3.5.56 Objection 331 was made on the basis that Policy PTS 01 Portstewart Town Shop Fronts would only halt and stifle the properties along the Promenade. No evidence was presented to substantiate or explain the objection.

HOT FOOD TAKE AWAYS & AMUSEMENT ARCADES

- 3.5.57 The Plan sets out Policy PT02 Portstewart Town, Hot Food Takeaways in the Plan to restrict further hot food take aways only to the western side of The Diamond. Policy PT03 Portstewart Town, Amusement Arcades is to restrict further amusement arcades being permitted in Portstewart. The main issues raised relate to the policies being too strict.

- 3.5.58 Objections 331 to Policy PT02 and Policy PT03 are on the basis that these policies will only serve to halt and restrict development of business in Portstewart. Neither objection was substantiated.
- 3.5.59 Objection 5192 was to Policy PT02 on the basis the policy is too restrictive. No evidence was presented to substantiate this objection.

RETAIL, SERVICES AND OFFICES

- 3.5.60 The Plan sets out Commercial Designation PTLC01 Coleraine Road Local Centre on Map 3/05a. The main issue raised relate to the location of the commercial designation.
- 3.5.61 Objection 331 is to the location of Designation PTLC01 in Portstewart. No evidence was presented to explain or substantiate the objection.
- 3.5.62 Objection 4715 is to the failure of the Plan to designate lands at **Larkhill Filling Station, 171 Coleraine Road**. The objection was not substantiated with any evidence to fully demonstrate why this retail outlet should merit being designated as a local centre.

TRANSPORTATION AND CAR PARKING

- 3.5.63 Section 13 page 159 volume 2 address transportation issues for Portstewart. Section 14 sets out issues relating to car parking in Portstewart. The main issues relate to failure of the Plan to make sufficient provision for the transportation and car parking issues in Portstewart.
- 3.5.64 Objections 4479, 4491 and 5738 seek that traffic relief measure should be introduced to alleviate traffic congestion in Portstewart. The text in the Plan clearly states that a number of local transport and safety schemes will be identified for implementation that will feed into the Sub Regional Transportation Plan. The delivery of these schemes is not within the mechanism of this Plan. No evidence was presented by any of the objectors to suggest how to incorporate such measures into the Plan. Accordingly the objections are not sustained

LOCAL LANDSCAPE POLICY AREAS (LLPAs)

- 3.5.65 The Plan designates thirteen LLPAs in and around Portstewart. The main issues to the designations include:
- a) The designation of LLPAs;
 - b) The inclusion of land within a LLPA designation; and

The Designation of LLPAs

- 3.5.66 Objections 331 to Designations **PTL01 Cromore, PTL02 Portstewart Point, PTL04 Golf Links and Eastern Coastal Area, PTL05 Rockview, PTL06 Dominican Walk, PTL07 Strand Head, PTL08 Portstewart Strand, PTL09**

Portstewart Golf Course, PTL10 Mullaghacall and PTL13 Cashlandoo based on the scale and/or location of these designations outside the SDL and within a Green Belt. Each of these designations has been proposed to protect key landscape attributes which relate to the setting of Portstewart. The objector did not provide any evidence to substantiate why the land did or did not merit an LLPA designation. Accordingly the objection is not sustained.

- 3.5.67 Objection 5192 is to Designation **PTL01 Cromore LLPA and to the Designation of the Historic Park, Garden and Demesne**. The objection to the LLPA was not explained or substantiated. The Cromore Estate has not been identified as a Historic Park, Garden and Demesne in the Plan. Therefore the identification of the Cromore Estate boundary is not matter before us in this Plan. Accordingly the objection is not sustained.
- 3.5.68 Objections 4319 to Designations **PLT02 Portstewart Point** and **PLT07 Strand Head** LLPAs were not explained or substantiated.
- 3.5.69 Objection 5584 seeks the connection of Designations **PTL02 to PTL07 LLPA**. There are two areas of land omitted from the LLPA between PTL02 and PTL07. Only one has been submitted on the objector's map which relates to the area between PTL02 and PTL06. Both areas relate to the coastal walk and comprise of a narrow rocky shore line. There is no distinguishable difference in the landscape characteristic of the neighbouring LLPA from the omission site. We support the Department's view that it is logical that these two areas are included within PTL02 and PTL07.
- 3.5.70 Objection 331 to Designation **PTL03 Portmore Road**, because of its location, was not substantiated.
- 3.5.71 Objection 4837 is to Designation **PTL04 Golf Links and Eastern Coast Area** and the associated text set out in paragraph 15.8 page 162, Volume 2 of the Plan and questions basis of the limitations relating to replacement dwellings. The intention of which is to limit the scale of replacement development in the context of the LLPA. Architectural merit is also important and any proposals for replacement dwelling would also be assessed under Regional Policy contained in PPS21. Given the expansive open character of the landscape with the appearance of minimal development we accept that the restrictions set out in paragraph 15.8 should remain in place. Accordingly the objection is not sustained.
- 3.5.72 Objection 5649 seeks the extension of Designation **PTL09 Portstewart Golf Course** to join the boundary of Coleraine settlement. The rationale for this extension to this LLPA is to ensure the visual integrity of the Lower Bann River and Estuary. The objector did not provide sufficient information in terms of a map and key features to support the extension of this LLPA designation. Designation PTL09 seeks to protect the setting of the golf course. To extend it to protect the setting of the River Bann goes beyond the aim of this LLPA. Accordingly the objection is not sustained.
- 3.5.73 Objections 331, 4838, 5494 to Designation **PTL11 Strandview LLPA** as it is within an area designated for housing zoning PTH48 Strandview. The

Department stated that they consider that the attributes of this LLPA are weak in comparison to all of the other designations. The Department has no objection to the removal of this LLPA and its supporting guidance in paragraph 15.15 of page 164, Volume 2 of the Plan. Accordingly we recommended that this LLPA is removed from the Plan.

- 3.5.74 Objection 331 to Designation **PTL12 Flowerfield LLPA** questions the need for such a designation when this area forms part of an open space designation that will protect the site from development. The LLPA designation overlaps the open space designation and also includes the surrounding landscape. The area provides an important area of community, municipal and landscape features in this area. The open space designation does not prevent this land from being developed as regional policy allow for exceptions for development in such areas. Accordingly the objection is not sustained.
- 3.5.75 Objections 331 to any new designation on land **adjacent to Meadow Gardens, Station Road, land between Dunsuivnish Avenue and Knockandcord Drive, Station Road, land along Lisadell Avenue and land south of Agherton Village** were unsubstantiated.
- 3.5.76 Objection 4661 relates to LLPA zoning on the **Dominican College School** on the basis that such a designation will compromise the ability to redevelop the property in the future. The objection specifically refers to PTL04 which does not impact on the school whereas PTL06 Dominican Walk LLPA abuts the school boundary. Nonetheless the objection was not substantiated with any evidence to question the designation of an LLPA at either location.

The Inclusion of Land within a LLPA Designation

- 3.5.77 Objection 4 is to the inclusion of lands at **Galvally off Mill Road** within **PTL01 Cromore LLPA** on the basis that this land does not merit an LLPA designation given this is urban fringe farm land. The objection site relates to some 6.85 hectares of land at the centre of this LLPA designation. The designation has been made on the basis of its contribution to the landward setting of Portstewart and encompasses many important archaeological and historic features. The removal of this land from the LLPA would impact on the integrity of the overall designation which provides an important setting to Portstewart. The objection is not sustained.
- 3.5.78 Objection 4572 relates to the inclusion of land between **Station Road, Lisadell Avenue and Old Coach Road** within **PTL01 Cromore LLPA**, on that basis this land would be better included within the SDL. The objection site comprises a significant portion of the LLPA designation and no persuasive evidence was presented to suggest why this large area of land did not warrant the LLPA designation.
- 3.5.79 Objection 4885 (same site as 4752) to the extent of the objection land **bounded by Mill Road, Agherton Road and Station Road** identified within the Designation **PTL01Cromore LLPA**. The Department has identified the key features of this LLPA in the Plan and identifies the majority of the LLPA on Map 3/05a. The full extent of the LLPA should be set out in the Maps

Booklet that accompanies the Plan. However we note the area to which the objection site relates is fully set out on Map 3/05a. The objector did not provide any evidence to substantiate why this land should not be designated as an LLPA.

- 3.5.80 Objection 4980 relates to the inclusion of land at **Galvally Road, off Mill Road** within Designation **PTL01 Cromore LLPA**. The objection site relates to 5.8 hectares of land all within the LLPA. The LLPA recognises the landscape setting of Cromore Estate which makes an important contribution to the landward setting for Portstewart at this location. Planning permission C/2008/0372/F slightly encroaches on the edge of the LLPA. As noted above it is recommended that this small area is brought within the SDL as part of Housing Zoning PTH24 Rockland Gardens. We consider that the loss of this small area would not compromise the environmental quality or key feature of this LLPA designation, and accordingly should also be removed from the LLPA at this location. At the EIP the Department also recommended amending the supporting text in paragraph 15.2 and 15.3 to read as follows:

“Within this LLPA, there will be a presumption against new development. However, favourable consideration can be given to the extension and conversion of existing buildings of historic merit.”

We accept that this wording would be more appropriate to facilitate the upkeep of the existing buildings in this large LLPA, than restricting development to modest scale modifications.

- 3.5.81 Objection 5179 seeks the removal of land off **Station Road** from Designation **PTL01 Cromore LLPA**. No evidence was presented to substantiate why the designation should be removed.
- 3.5.82 Objection 5495 seeks the removal of land at **Agherton Road** from Designation **PTL01 Cromore LLPA**. The intention presented was that this designation would restrict tourism development on this land. No persuasive evidence was presented to demonstrate why this land should be removed from the proposed LLPA or exactly how the designation would restrict the tourism potential on this site. However to allow some flexibility for tourism development in this area the Department suggested the following amendments:

- Amend Pt 2 of the Designation by removing reference to ‘Green Belt’
- Replace the supporting text in paragraphs 15.2, 15.3 and 15.4 to state *“Favourable consideration may also be given to the extension of existing tourism facilities providing the integrity, and quality of the LLPA is not significantly harmed as required under Policy ENV2 of the Plan”*

We support these amendments to the wording to the Plan, as this places the onus on the developer to demonstrate how the proposal would not harm the integrity of LLPA.

- 3.5.83 Objection 4853 to lands within designation **PTL05 Rockview LLPA** was unsubstantiated. Objection 5318 seeks the removal of land at **Rockview Lane** from this proposed LLPA designation. The objection was not explained or substantiated.
- 3.5.84 Objection 5148 seeks the removal of land **adjacent 38 Strand Road** from Designation **PTL06 Dominican Walk**. Notwithstanding the submission of a Planning application on the site the objector failed to provide any evidence to justify why the site should be removed from the proposed LLPA.
- 3.5.85 Objection 4887 relates to the inclusion of land **west of Meadowlands** being included within Designation **PTL09 Portstewart Golf Course LLPA**. No evidence was presented to substantiate this objection.
- 3.5.86 Objection 4984 relates to the inclusion of land at **Rocklands off Station Road** within Designation **PTL11 Strandview LLPA**. The objection site is overlapped by objection site 4980. However, the attached map relates to Designation PTL01 Cromore LLPA. Regardless the objector did not provide any persuasive evidence to substantiate why this area should be removed from the LLPA designation. As noted above the boundary of the LLPA should be amended to remove the site within planning approval C/2008/0327/F.
- 3.5.87 Objection 5192 to lands at **Coleraine Road** within Designation **PTL13 Cashlandoo LLPA**. The objector advises that planning consent has been granted for retail development. Only a small portion of the retail site encroaches on the LLPA, the removal of which would not significantly detract from the integrity of the LLPA which aims to protect the archaeological rich area at this location. We therefore do not support the removal of this land from the LLPA.

Recommendations

- 3.5.88 **We recommend:**
- **That the omission sites referred to in objection 5584 are included within the respective adjacent LLPAs PTL02 and PTL07.**
 - ***That the full extent of LLPA PTL01 Cromore should be set out clearly in the Plan.***
 - ***In respect of LLPA Designation PTL01 Cromore:***
 - **That the boundary of the LLPA is amended to remove land within planning approval C/2008/0327/F from the LLPA, and**
 - **The supporting text in paragraph 15.2 and 15.3 is substituted with the above wording as set out in italics in paragraph 3.5.80 as follows:**

Within this LLPA, there will be a presumption against new development. However, favourable consideration can be given

to the extension and conversion of existing buildings of historic merit.”

- ***The text and supporting text of the LLPA should be amended as follows:***
 - ***Amend Pt 2 of the Designation by removing reference to ‘Green Belt’***
 - ***Replace the supporting text in paragraphs 15.2, 15.3 and 15.4 to state “Favourable consideration may also be given to the extension of existing tourism facilities providing the integrity, and quality of the LLPA is not significantly harmed as required under Policy ENV2 of the Plan”***

- **That Designation PTL11 Strandview LLPA and its associated text in paragraph 15.15, page 164, Volume 2 are removed from the Plan.**

3.6 ARTICLAVE

HOUSING

3.6.1 Articlave is designated as a village in the draft Plan. The SDL is identified on Map 3/06

Plan Provision for Housing

3.6.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 120 housing units in Articlave. Between January 1999 and August 2010 some 170 housing units were completed. The Housing Update Figures Paper 2011 estimated a surplus of 82 units (68.2%) above the Plan allocation in Articlave. There is no need to expand the SDL.

Social Housing

3.6.3 There was no social housing need presented for Articlave.

Settlement Development Limits (SDL)

3.6.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Articlave. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of our report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify exceptions being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Articlave. Our assessment of the objections is as follows:

3.6.5 Objection 331 relates to some land **behind the dog kennels north of Mussenden Road**. The objection site is relatively flat and is unaffected by any environmental constraints. Even though it is bounded by the urban edge to its south and western boundaries, its inclusion would represent an urban expansion of the settlement, failing to result in a compact urban form.

3.6.6 Objections 350 and 4840 relate to a smaller portion of the above site behind **232 Mussenden Road** and seek its inclusion within the SDL. The objection site is a rectangular portion of land running back from the existing road side development that is within the SDL. The site is not restricted by any environmental constraints. Physically the inclusion of this site would not give rise to the rounding off at the edge of the settlement, but would appear as a linear intrusion outwards from the existing built form. Accordingly there is no justification to support the inclusion of this land within the SDL.

3.6.7 Objection 331 relates to the exclusion of land **south of Fairview Park and along St Paul's Road** on the basis no room has been left to accommodate the expansion of the settlement or for new housing. This land overlaps the

LLPA designation AEL01 for the settlement where the Articlave River runs. Most of the land within the objection site is within the flood plain or within the wooded setting along the river bank at the edge of the settlement. The objector did not provide any persuasive evidence to demonstrate an overriding need to include this environmental sensitive area within the SDL.

- 3.6.8 Objections 331 to **land to the rear of Mussenden Grange, land opposite Exorna Park, land to the rear of Mussenden Gardens** were unsubstantiated with no justification to support these objections.
- 3.6.9 Objections 4386 and 5597 are both to the SDL for Articlave, stating that there are suitable sites on the edge of the settlement that could be included and zoned for housing. Neither objection detailed or provided a map to illustrate what land the objection referred to. Accordingly these objections are not sustained.
- 3.6.10 Objection 4462 relates to land along the frontage of **Quilly Road** for low density housing affordable housing. The site relates to a large field on the approach from Coleraine into the settlement. At present it is not physically linked to the existing built form of the settlement as it separated by a wooded area and Articlave River. The site would therefore not give rise to a logical extension to the settlement by itself. Accordingly the objection is not sustained.
- 3.6.11 Objection 4467 relates to one large field **behind existing housing 185-193 Mussenden Road**. The site runs alongside the existing housing development at Exorna Park and shares a similar level and gradient as this neighbouring land. The inclusion of this site to the north west edge of the settlement would provide a logical rounding off to the settlement. The site is free from any restrictive environmental constraints. Site services including access to the site from the neighbouring residential development is available. However the over provision of housing land in Articlave outweighs the site specific characteristics of this site. We consider that the land should remain outside the SDL.
- 3.6.12 Objection 4648 relates to land behind housing on either side of the **Castlerock Road**. The Department requested that the objector clarify the exact area to which his objection site relates. The map resubmitted with the objection is still unclear. However the map covers land to the **adjacent to Exorna Park**. This area described in the objection also relates to the rounding off at this location of settlement. This site has been addressed in the consideration of the above objection 4467. Whilst the inclusion of land in this area could present a logical rounding off to the settlement and services are available, there is no need for additional land for housing in Articlave. The objection is not sustained.
- 3.6.13 Objection 4955 relates to the inclusion of a small site **north west and adjacent to Mussenden Gardens**. The site is flat land adjacent to the rear of the existing urban edge. It is free from any environmental constraints and could be accessed via Mussenden Gardens. While the site would lie into this part of the settlement, the over provision of housing land outweighs the site specific characteristics of the site. It should remain outside the SDL.

- 3.6.14 Objection 4968 relates to land **adjacent to Sconce Road**. The site is a small area along the road side and backed by the river. It is physically separated from the existing urban edge of Articlave and from the proposed SDL. The north west boundary of the site comprises a vegetated corridor of the Articlave River and partly falls within the flood plain. Notwithstanding the lands location close proximity to services within Articlave, the inclusion of the objection site would not present a logical extension to the SDL and has many environmental constraints that would restrict the development of the site. Accordingly this land should remain outside the proposed SDL.
- 3.6.15 Objection 5207 relates to land at **Dunboe Road**. The objection site does not physically relate to Articlave and insufficient information was provided to establish the exact location and substantiate the objection.
- 3.6.16 Objection 5317 is to the exclusion of a large area of land **west of Fairview Lane** from the SDL. This land is located on rising land which forms a backdrop to the existing development within the settlement. The southern boundary of the site fronts onto Fairview Lane where access could be achieved. Access could also be taken from the neighbouring residential developments at Mussenden Grange and Dunboe Gardens. However, given the scale and size of this site its inclusion would result in a large expansion of the west side of the settlement. This would fail to give rise to a compact urban form. There is no justification to include land of this scale within Articlave.
- 3.6.17 Objection 5508 also relates to 2 portions of land side by side set back along **Sconce Road** to the north west side of the proposed LLPA AEL01 designation. In total the objection site relates to approximately 1 hectare and is outside the LLPA. The site's north west boundary is defined by a narrow right of way along Fairview Lane which does not form part of the objection site. A small portion of the south east boundary of the land is within the flood plain of the Articlave River. If the site were included within the SDL a KSR restricting built development from this portion of land in the flood plain would be acceptable. The objector also advised that any issues relating to the Japanese Nutt Weed on the land could be addressed prior to the commencement of development on the site. Whilst the site is substantially screened by mature vegetation, it is this vegetation that assists the assimilation of the settlement into the countryside when approaching the settlement along Sconce Road. The loss of vegetation would expose views of the settlement and could impact on the integrity of the proposed LLPA at this location. The Department confirmed that Dartress Bridge presents problems relating to accessing the site from Sconce Road, but that this would be a preferable option for access in terms of road safety rather than an access for housing along Fairview Lane. We are satisfied that access can be achieved to the site and the matters relating to road safety would be a matter to be agreed through the submission of a planning application. The inclusion of this land within the SDL is not free from constraints, in terms of access, flooding, loss of vegetation and visual impact. Whilst the site may only yield up to 25 residential units at 25 dph there is no strategic need for additional land to be included within the SDL especially in the context of the constraints relating to this land. Accordingly, the site should remain outside the SDL.

- 3.6.18 Objection 5513 overlaps objection site 5317 and takes in a much larger area **west of Fairview Lane**. The inclusion of this land on either site would result in an excessive extension to the western side of the settlement failing to provide a compact urban form. This combined with a lack of strategic need for more housing land means that it is logical that this site should remain outside the SDL.
- 3.6.19 Objection 5527 relates to land to the **east side of Mussenden Road**. The inclusion of this land would result in an excessive extension to the north eastern side of the settlement resulting in a large linear extension along Mussenden Road. This would fail to provide a compact form of development. The site should remain outside the SDL.
- 3.6.20 Objection 5704 relates to three separate portions of land at **Sconce Road, Quilly Road to the east of Mussenden Road and North of Exorna Park**. No evidence was presented to substantiate these objections. Objection 5722 was made to the SDL for Articlave, but no evidence was presented to support or substantiate this objection.

HOUSING ZONINGS

- 3.6.21 The main issues relate to the zoning of housing land.
- 3.6.22 Objection 331 to Housing Zoning **AEH03 Rear of St Paul's Church** on the basis that KSR 2 states that development of the site will require additional land to provide access to the public road. This housing zoning relates to a small 0.25 hectare site which is backland to the surrounding housing development and St Paul's Community Centre. Access to this housing zoning is limited at present to a narrow private access and car park area which services the community building. Planning history on the site indicates that planning permission (C/2004/001/F) was granted for the erection of 2 temporary mobiles for 12 months for child day care facility. These buildings are not on site at present. Given the restricted access to this housing zoning which would have to come across third party community land we accept that this could restrict the likelihood of this site ever being developed for housing. This lack of certainty means we accept that the site should not be zoned for housing and that it should be removed from the Plan. As it is such a small site and would potentially yield up to 5-6 residential units the loss of this housing zoning would not impact significantly on the housing allocation for Articlave.

Recommendations

- 3.6.23 **We recommend:**
- **The removal of Housing Zoning AEH03 Rear of St Paul's Church from the Plan.**

LOCAL LANDSCAPE POLICY AREAS (LLPA)

- 3.6.24 The main issues relate to the designation of the LLPA.
- 3.6.25 Objection 331 to **AEL01 Articlave River LLPA** is to its location within a Green Belt and therefore there is no need to attach a strict LLPA designation to this area. The introduction of PPS21 has resulted in the removal of Green Belt from the Countryside. The LLPA has been designated to protect key features such as the Articlave River and its context which is important to the setting of the eastern side of the settlement. The objector failed to substantiate why this landscape did not merit an LLPA designation. The objection is not sustained.
- 3.6.26 Objection 5508 seeks for land to be removed from the most southern part of the proposed **AEL01 Articlave River LLPA**. No evidence was presented by the objector to substantiate why this land should be removed or did not merit being part of the proposed LLPA designation. Accordingly the objection is not sustained.

3.7 CASTLEROCK

HOUSING

- 3.7.1 Castlerock is designated as a village in the draft Plan. The SDL is identified on Map 3/07.

Plan Provision for Housing

- 3.7.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 193 housing units in Castlerock. Between January 1999 and August 2010 some 297 housing units were completed. The Housing Update Figures Paper 2011 estimated a surplus of 217 units (112.4%) above the Plan allocation in Castlerock. There is no need to expand the SDL.

Social Housing

- 3.7.3 The updated (March 2011) Housing Need Assessment figures indicated an increase in social housing need of 15 residential units over the next 7 years (2018). At the EIP the Department stated that this need can be met through the provision of regional policy set out in CTY5 of PPS21. Accordingly we are satisfied there is no need to expand the settlement limit Castlerock to meet the social housing needs of the settlement.

Settlement Development Limits (SDL)

- 3.7.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Castlerock. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of the report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Castlerock. Our assessment of the objections is as follows:
- 3.7.5 Objection 8 relates to land at **School Lane** but was not substantiated with evidence.
- 3.7.6 Objections 331 to the **Caravan Park (Castlerock Holiday Park); land north of Bruce Park; land along the Coastline (including Solitude Holiday Park); and land west of Bruce Park** on the basis of their location or that there is no room left for future development within the village for expansion were not substantiated.
- 3.7.7 Objection 4386 and 5597 are to land **adjacent to the east of the old swimming pool and the west of 51 Main Street**. Objection 4386 did not provide a map to indicate the exact scale and location of this site. Both objections relate to a small area of open space green space amongst built

development to the coastal side of Main Street. The area of space allows open views of the sea and the coastline. The objector's failed to present any substantive reasoning why it should be included within the SDL. Given the important amenity value of this piece of land it is best placed outside the SDL in order to maintain its protection from unnecessary development at this location.

- 3.7.8 Objection 4856 to land **west of Freehall Road** is on the basis that land should be made available for low cost housing. The objection site relates to some 0.95 hectares of land and is bounded to the north and east by existing residential development. The southern boundary of the site is undefined and the western boundary is defined by the Freehall Road. Full planning permission (C/2011/0159) has been submitted for social housing to be provided by Apex Housing Association. The development is for 14 semi detached dwellings on 0.59 hectare of the objection site. Since the EIP we note that this application has been approved on the site. We note that development has not started on the site to date (June 2013). Accordingly, given that regional policy in the context of PPS21 makes allowance for small scale social housing on the edge of the settlement means there is no need for this site to be brought within the SDL.
- 3.7.9 Objection 4860 relates to land **west of and bounded by School Lane**. The objection site is a rectangular portion of land that only joins the proposed SDL along the north east of the site where it is adjacent to the Twelve Apostles (Listed Building). The objection was not substantiated by any persuasive evidence to support its inclusion within the SDL. The site of itself would not represent a logical extension to the SDL and would require the inclusion of land to the east side of School Lane. It also intrudes into the AONB designation and sits on elevated land overlooking the settlement. Accordingly the objection site should remain outside the proposed SDL.
- 3.7.10 Objection 4869 relates to a large area of land **south of Liffock Court** within the SDL for housing. The site comprises two field parcels located to the south of the settlement. This land is relatively flat, open and exposed. Sea Road runs along the west boundary of the site, which is the main route into the settlement. The inclusion of this site would represent a significant extension to the southern side of the settlement, by linking the settlement to the road side development at the junction of Sea Road with Mussenden Road (A2). The inclusion of this land would be contrary to the Plan objectives in terms of creating compact urban form. Accordingly this land should remain outside the SDL.
- 3.7.11 Objection 5495 relates to the inclusion of **Castlerock Caravan Park** to the east of the settlement within the SDL for development purposes. We have already concluded in section one of our report, dealing with strategic issues (paragraph 1.3.62) that peripheral caravan parks should be left outside settlement limits. There are no site specific arguments that would persuade us to resile from that opinion. Accordingly we do not support the inclusion of this caravan park within the SDL.
- 3.7.12 Objection 5650 relates to land **south and south west of Castlerock**. Inclusion of the objection site within the SDL would almost double the size of

the settlement and would fail to result in a compact urban form. No evidence was presented to support a need for such a significant expansion of the settlement. Accordingly the objection is not sustained.

HOUSING ZONINGS

- 3.7.13 The main issues relate to the zoning of housing land.
- 3.7.14 Objection 331 to KSR 2 of Housing Zoning **CKH08 Castlewalk** was not substantiated. Planning permission has been granted on the site for residential development, and access is available to the main road via a laneway. Accordingly the objection is not sustained.
- 3.7.15 Objection 331 to KSR2 of Housing Zoning **CKH09 land south of Sea Park** was not substantiated. The public road at Sea Park comes up to the boundary of this housing zoning albeit a laneway runs to the north boundary of the housing zoning, but no built development restricts access to this land. Objection 4563 to this housing zoning was on that basis of the wetland on the site. KSR3 requires this aspect of the site is given particular attention. The objector provided no substantive reasoning as to why the site could not be developed for housing or why it would be best used as open space. Accordingly, neither objection is sustained and the housing zoning should remain in the Plan.
- 3.7.16 Objections 331 to the location of Housing Zonings **CKH10 Liffork Park and CKH11 Sea Road** were not substantiated.
- 3.7.17 Objection 5190 seeks a higher density range on Housing Zoning **CKH11 Sea Road**. The Plan specifies a density range of 15 to 25 dph which is consistent with the surrounding area and the other housing zonings in the Plan. The objector failed to substantiate why the density should be higher and to what extent it should be changed. Accordingly the objection is not sustained.

APARTMENT DEVELOPMENT

- 3.7.18 Objections were received to Designation CKA01 Area of Opportunity for Apartments. This designation has been presented on Map 3/07 Castlerock. Policy relating to this designation was set out in Plan Strategy and Framework under Policy HOU3 Apartment Development in Settlement with Pressure for Second Homes.
- 3.7.19 Section 1 of our report on the Plan Strategy and Framework recommends deletion of Policy HOU3. As we do not support the use of this policy in the Plan we also consider that the Designations relating to this policy should also be deleted from the District Proposals in the Plan.

Recommendations

- 3.7.20 **We recommend:**
- **That Designation CKA01 Area of Opportunity for Apartment Development is deleted from the Plan.**

OPEN SPACE

- 3.7.21 The main issue relates to the failure to include land within the major area of open space.
- 3.7.22 Objection 4383 notes that the children's play area has been omitted from the Major Area of Open Space and suggests that the line of the designation should be redrawn to include the play area. No evidence was presented to substantiate this objection. However as the designation has been identified for information only and Policy OS1 of PPS8 already affords protection for the retention of recreational areas such as the play park, we are satisfied there is no need to amend the Plan.

LOCAL LANDSCAPE POLICY AREAS

- 3.7.23 The main issues relates to the designation of land as an LLPA.
- 3.7.24 Objection 8 is to Designation **CKL03 School House LLPA** which runs to the west of the site. The objector failed to explain the reasoning for the objection to this LLPA accordingly it is not sustained.
- 3.7.25 Objections 331 to the any new policy designations on land relating to **Caravan Park (Castlerock Holiday Park); land north of Bruce Park; and land along the Coastline (including Solitude Holiday Park)** were not substantiated.
- 3.7.26 Objection 5668 objects to the clarity of Map 3/07 in relation **CKL03 School House LLPA** as it overlaps the edge of the SDL. It is evident that the designation follows the laneway and boundary to the edge of the settlement in this area. However, we accept that such information should be clearly shown on the map and the overlap of other delineations should not be confusing to anyone reading the map. We therefore recommend that this designation is clearly set out within the Plan and is referred to in the supporting text.
- 3.7.27 Objection 5760 seeks that some development should be acceptable in the context of the proposed LLPA designation **CKL03 School House**. This is a matter for the development management process to determine what is acceptable and what is not in the context of the prevailing Plan designations at the time of that application to the Department.
- 3.7.28 Objection 5761 on the basis there is no justification for designating **CLK03 School Lane** as an LLPA. The designation relates to a hedgerow that provides a pedestrian link. This could be incorporated in to any zoning on the adjacent land. It provides a soft rural edge to the settlement in this area. Development in its vicinity must be sensitive not to detract from the natural and landscape value of the proposed LLPA. We are not persuaded that it should be removed from the Plan.

Recommendations

3.7.29 **We recommend:**

- **Designation CKL03 School House LLPA is clearly defined and set out in the Plan and is referred to in the supporting text.**

3.8 CASTLEROE

HOUSING

- 3.8.1 Castleroe was incorporated within the SDL of Coleraine in the NEAP. The draft Plan separates the settlement from Coleraine, recognising its village status. The SDL for Castleroe is identified on Map 3/08.

Plan Provision for Housing

- 3.8.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 48 housing units in Castleroe. Between January 1999 and August 2010 some 70 housing units were completed. The Housing Update Figures Paper 2011 estimated a surplus of 127 units (264.6%) above the Plan allocation for Castleroe. There is no need to expand the SDL.

Social Housing

- 3.8.3 There was no social housing need identified for Castleroe.

Settlement Development Limits (SDL)

- 3.8.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Castleroe. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of our report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL or zoning additional housing land for Castleroe. Our assessment of the objections is as follows:

- 3.8.5 Objection 264 relates to land at **The Cutts, Castleroe Road**. The roadside site is bounded to the north east by the River Bann and falls within the SDL for Castleroe. It is also within the boundary of the proposed Designation CEL18 The Cutts LLPA. The site is occupied by an industrial/commercial building. The Plan does not restrict any particular use on the objection site, including the redevelopment of the site for housing. Without a substantiated need for more zoned housing land in Castleroe, we are satisfied that this land should remain as white land in the Plan.

- 3.8.6 Objection 329 relates to land **south of 97 Castleroe Road**. The objection site is one field located adjacent to Housing Zoning CRH02. This housing zoning is under construction and has some remaining capacity. The objection site leads from Castleroe Road and wraps to the rear of existing dwellings along this road. The Department have confirmed that the eastern part of the site would be constrained by a floodplain along the banks of the river. Whilst in terms of urban form the site if included would give rise to a compact edge to the settlement, nonetheless given the excessive over

provision of housing land in the settlement we support the Department's view that there is no need to expand the SDL at this location.

- 3.8.7 Objection 4956 relates to some 1.2 hectares of land **adjacent to Castleroe Primary School** and seeks the extension of the SDL along the road frontage of Castleroe Road to meet the boundary of the objection site. The objection site relates to a gap in the roadside development between the primary school and a farm group. The inclusion of all this land, even though development exists on some of it, would result in a long linear extension to the southern part of the settlement along Castleroe Road. As such its inclusion would fail to result in a compact urban form along this part of the Castleroe Road. The Planning history relating to Castleroe Primary school C/2004/1322/F does not justify the inclusion of the site within the SDL. Accordingly we are satisfied that the objection site should remain outside the SDL for Castleroe.
- 3.8.8 Objection 5500 relates to some 2.4 hectares of land **south of Cherry Park**. The land is immediately south of existing housing land. Some small scale commercial premises are located to the sites western boundary, but this land is outside of the proposed SDL. The inclusion of the objection site in the SDL would result in an irregular edge to the SDL at this location, failing to result in a compact urban form. Notwithstanding the evidence presented supporting the inclusion of the site relating to the provision of services and utilities, we are not persuaded that the objection site should be included within the SDL for Castleroe.
- 3.8.9 Objection 5722 was a general objection to the designated SDL for Castleroe. No evidence was presented to substantiate the objection.

HOUSING ZONINGS

- 3.8.10 The main issue relates to the zoning of housing land.
- 3.8.11 Objection 331 to Housing Zoning **CEH02 Ballyness South** on the basis of the KS2, which requires that additional land to provide access to the public road, may be needed. Planning permission (C/2006/0795/F) was granted on this housing zoning for 51 residential units and development has commenced on the site. The issue relating to KSR2 has not prevented development coming forward on this housing site. The objection is not sustained.

INDUSTRY

- 3.8.12 The main issue is to the failure of the Plan to designate more industrial land in Castleroe.
- 3.8.13 Objection 331 was to the designation of the existing industrial site **CRI01 at Wood Processing Works at Curragh Road** as it is already developed for industrial use and therefore more land should be zoned for industrial use. The Plan seeks to protect the existing industry and business use in the town which is consistent with the requirements of regional policy set out in PPS4. The objector did not provide any evidence to state where or justify a shortage of industrial land in the settlement. Accordingly the objection is not sustained.

3.9 MACOSQUIN

HOUSING

- 3.9.1 Macosquin was designated as a village in the NEAP. The draft Plan also recognises the settlement as a village. The SDL is identified on Map 3/09.

Plan Provision for Housing

- 3.9.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 97 housing units in Macosquin. Between January 1999 and August 2010 some 46 housing units were completed. The Housing Update Figures Paper 2011 estimated a surplus of 53 units (54.6%) above the Plan allocation for Macosquin.

- 3.9.3 Objection 4525 was made on the basis of a shortage of building land in Macosquin. The objector argued that the Plan only provides for an additional 3 dwellings for the Plan period on the basis that there has been a reduction in the provision of land with a remaining provision of 2.47 hectares of land. The objector argued that MNH04 Ramsay Park is land locked and that MNH03 land at Dunderg Road/Ballinteer Road is waterlogged, on a steep slope and is adjoining an estate. This therefore leaves 0.21 hectares of land at MNH02 Knockmore Crescent are the only potential development site providing three residential units. The observations made by the objector are not persuasive, as there is public access available for housing zoning MNH04 and the landscape characteristic within Housing Zoning MNH03 are not such that development could not be carried out. Therefore we are not persuaded that there is a need for additional land at Cashel Road or South of the Dunhill Road to be brought within the SDL. The objection is not sustained.

Social Housing

- 3.9.4 There was no social housing need identified for Macosquin.

Settlement Development Limits (SDL)

- 3.9.5 We concluded in section one of the report that there is no strategic need to allocate further housing land in Macosquin. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of the report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land within the SDL for Macosquin. Our assessment of the objections is as follows:

- 3.9.6 Objection 329 relates to 1 hectare of land **adjacent to 49 Dunderg Road**. The objection site is one field north of Dunderg Road, and is opposite existing roadside linear development to the south side of the road. The

inclusion of this would further compound the linear pattern of development sprawling along Dunderg Road, accordingly we support its exclusion from the SDL.

- 3.9.7 Objections 331 relates to the inclusion of **land along Ringrash Road, land along Dunhill Road, land along Dunderg Road and land at Ramsey Park** on the basis that the SDL is too restrictive and tight for the future development of the village. However, no persuasive evidence was presented to justify a need for additional land to be brought within the SDL. Accordingly these objections are not sustained.
- 3.9.8 Objection 331 presented no evidence to substantiate the inclusion of land marked '1' **north of Dunhill Road** and land marked '2' **north west of Ramsey Park**.
- 3.9.9 Objections 4386 & 5597 state that there is suitable land on the edge of the settlement that could be included and zoned for housing. Objection 4386 also refers to the failure to identify additional land for a playing field and play area within the SDL. The objections were not supported by any reference to a particular site or location for housing land or playing fields. Accordingly these objections are not sustained.
- 3.9.10 Objection 4648 seeks the extension of the SDL to include land **north west of Macosquin along the Ringrash Road**. Some of this land is within the SDL; to further extend the SDL along the Ringrash Road would give rise to further urban sprawl to the north west.
- 3.9.11 Objection 4845 seeks the inclusion of land north of **Ringrash Road and West of Ramsey Park**. Planning permission (C/2005/0211/O & 2009/0617/RM) has been granted for housing on this site. The Department has suggested that the SDL is amended to take this account of this permission which was initially allowed at appeal. We accept that this site would present a logical rounding off along the Ringrash Road and that this site should be included within the SDL.
- 3.9.12 Objection 5458 seeks the inclusion of the above site 4845 and additional land to the **north west of Ringrash Road**. The inclusion of the additional land would result in an unnecessary intrusion beyond the existing edge of the settlement, resulting in urban sprawl further along Ringrash Road. This combined with a lack of need for additional land means there is no justification for the inclusion of this site within the SDL. Accordingly the objection is not sustained.
- 3.9.13 Objection 5596 seeks the inclusion of some 0.84 hectares of **land between Dunderg Road and Dunhill Road** on the basis this land would be suitable for housing. This small triangular portion of land is bounded to the north by Dunderg Road and to the south by Dunhill Road. The inclusion of this land would further elongate the linear pattern of development to the south side of Dunderg Road. This would fail to provide a compact form of settlement. The Department have also stated that the habitat and nature conservation interests of this land are worthy of protection and any development on this site would damage this landscape. This evidence was undisputed by the

objector. According given the lack of need for additional housing land and the failure to provide a compact form of development it is appropriate that the objection site remains outside the SDL.

- 3.9.14 Objection 5722 to the designated SDL for Macosquin was not substantiated.

Recommendations

- 3.9.15 **We recommend:**

- **The inclusion of objection site 4845 on land north of Ringrash Road and West of Ramsey Park within the SDL for Macosquin.**

HOUSING ZONINGS

- 3.9.16 The main issues relate to the zoning of housing land.

- 3.9.17 Objection 4563 to **MNH01 Consilla Drive and MNH02 Knockmore Crescent** is not justified given that residential development has been granted permission and is partly developed on these zonings. Accordingly the objection is not sustained.

- 3.9.18 Objection 331 to KSR6 which requires a buffer zone along the stream within Housing Zoning **MNH 03 land at Dunderg Road/Ballinteer Road Ballyness South** is on the basis that this is too exact and will serve to halt development. Regardless of the KSR the stream is a constraint within the site that will need to be incorporated and address within any development proposal on the site. Likewise the Area of Archaeological Potential is there to inform the public and is a matter to be addressed within any development proposal. The KSR and Area of Archaeological Potential will not halt development on the overall site, this objection is unfounded.

- 3.9.19 Objection 331 to the KSR for Housing Zoning **MNH 04 Ramsey Park** on the basis they are too strict and will halt development is not substantiated. Accordingly the objection is not sustained.

LOCAL LANDSCAPE POLICY AREAS (LLPA)

- 3.9.23 The main issue relates to the designation of the LLPA.

- 3.9.24 Objections 331 to designations **MNL01 St Marys LLPA and MNL02 Macosquin River 01** on the basis of there is no need for the additional designations in this area. The LLPA have been identified to protect the setting and key landscape features in these areas. Since the publication of the Plan Green Belt designations have been removed from the countryside. Accordingly we consider these LLPAs designations should remain in the Plan.

3.10 PORTBALLINTRAE

HOUSING

- 3.10.1 Portballintrae was designated as a village in the NEAP. The draft Plan also recognises the settlement as a village. The SDL for Portballintrae is set out on Map 3/10.

Plan Provision for Housing

- 3.10.2 Taking account of the 2008 HGI revision for Coleraine District the draft Plan makes provision for 105 housing units in Portballintrae. Between January 1999 and August 2010 some 141 housing units were completed. The Housing Up-date Figures Paper 2011 estimated a surplus of 109 units (103.8%) above the Plan allocation. There is no need to expand the SDL.

Social Housing

- 3.10.3 The updated (March 2011) Housing Need figures indicated a social housing need of 15 residential units for Portballintrae. The NIHE stated that the social housing needs for housing could be met through the existing housing zoning at PEH10.

Settlement Development Limits (SDL)

- 3.10.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Portballintrae. We further concluded that there is no persuasive evidence that the SDL is too restrictive to accommodate the housing over the Plan period. Accordingly we do not support those objections seeking the expansion of the SDL or those seeking the restoration of the land previously included within the SDL of the NEAP 2002. In these circumstances, as stated in section one of the report, any extension of the SDL will only be considered where there are urban form arguments or other factors that would justify an exception being made. It is on this basis that we will consider and assess the site specific objections seeking the inclusion of additional land or the zoning of additional land within the SDL for Portballintrae. Our assessment of the objections is as follows:
- 3.10.5 Objections 329 & 5186 on land **opposite Bushfoot Terrace** relate to one rectangular roadside field south east of the settlement. Notwithstanding the sites position opposite a terrace of dwellings that provide a sense of enclosure to the settlement; the lack of environmental constraints on the site; and the provision of road side infrastructure, the inclusion of this land would further compound the linear development along the Ballaghmore Road towards Bushmills. The physical break between Portballintrae and Bushmills is important to prevent the merger of the settlements and limit potential infill development at this location. The concept layout submitted with objection 5186 shows an intensive layout yielding over 30 residential units. We are not persuaded by either objector that there is an overriding housing or development need for Portballintrae that would warrant the inclusion of this land within the SDL. Accordingly this land should remain outside the SDL.

- 3.10.6 Objection 331 relates to land along **Beach Road**. This site falls within the environmental sensitive north east coast line of the settlement. It is therefore more suitably located outside the SDL for environmental and visual reasons. The objector provided no persuasive evidence to substantiate why this land should be included within the SDL.
- 3.10.7 Objection 331 relates to land along the **Coastline**. This site falls within the environmental sensitive northern coast line of the settlement which is better placed outside the SDL. The objector provided no persuasive evidence to substantiate why this land should be included within the SDL.
- 3.10.8 Objections 331 and 5090 relate to land **around Ballintrae Park**. The objection site is occupied by a caravan park. We have already concluded in section one of our report, dealing with strategic issues (paragraph 1.3.62) that peripheral caravan parks should be left outside settlement limits. There are no site specific arguments that would persuade us to resile from that opinion. Accordingly we do not support the inclusion of this caravan park within the SDL.
- 3.10.9 Objection 331 is to land **around Lisnaduff Avenue**. This small site is located at the end of Lisnaduff Avenue beyond the logical and physical edge of the existing housing in this location. The inclusion of this land would give rise to urban sprawl at this location on the edge of the settlement and should not be included within the SDL.
- 3.10.10 Objection 331 to land **adjacent to 18 Causeway View**. This small site is located at the very end of the row of houses along Ballaghmore Road. The inclusion of this land would further extend the linear form of development towards Bushmills. The objector provided no persuasive evidence to substantiate why this land should be included within the SDL.
- 3.10.11 Objection 331 relates to land labelled '1' which is **adjacent to Ballintrae Park** and labelled '2' at **Meadow Parks** seeking their inclusion within the SDL. The inclusion of either site would extend the settlement in a southerly direction leading to further urban sprawl. This land is visually open when approach Portballintrae along the Ballaghmore Road. Nonetheless the objector failed to provide sufficient persuasive evidence to substantiate or support their inclusion within the settlement.
- 3.10.13 Objection 4366 relates to a large portion land to the rear of **Bushfoot Terrace**, seeking its inclusion within the SDL to provide additional land for tourist accommodation and social housing. This area is to the east of the settlement rises gently and comprises of environmental and visually sensitive dune landscape as noted by the proposed LLPA designation PEL01 Bushfoot. The objection was not substantiated with any evidence to support the need for additional land of this scale for either tourist accommodation or social housing. Accordingly we do not support the inclusion of the objection site within the SDL.
- 3.10.14 Objection 4867 relates to the inclusion of a small triangular site at **Bayhead Road west of Seaport Avenue**. The site runs along the roadside and forms a small part of a large agricultural field. There is no boundary definition to the

west side of the site. Whilst on Plan it would appear as a logical rounding off to development in this area, on the ground the physical inclusion of this land would further breach the physical edge of the settlement provided by Seaport Avenue. Accordingly this land should remain outside of the SDL.

- 3.10.15 Objection 4882 relates to a small area of land **adjacent to Ballintrae Park and Gortnee Court**. The site could logically sit into the adjacent residential development. However the over provision of housing land outweighs the site specific characteristics of this site.
- 3.10.16 Objection 4883 seeks the inclusion of land **south of Gortnee Drive**. The site is a large triangular generally flat field some 1.5 hectares in size. Views of the site are possible on approach to the settlement from Bushmills along the Ballaghmore Road. The inclusion of this land which would appear as a significant urban expansion to the south of the settlement in the context of the scale and size of the settlement. Accordingly the objection site should remain outside the SDL.
- 3.10.17 Objection 5186 seeks that the **Derelict Boat House** and surrounding land is zoned as a development opportunity site for tourism, retailing and residential development. The site falls within the North Antrim Coast ASI and the proposed PEL02 Bay LLPA. The land is within the proposed SDL, but the LLPA designation places restrictions on development within it. The redevelopment of this site is a matter to be resolved through the development management process. The Plan has not designated any tourism or development opportunity site for any of the villages. Accordingly we are satisfied that such a tourism designation should not apply to this site.
- 3.10.18 Objection 5186 seeks the designation of **Sweeney's Wine Bar** to be allocated for residential development. The site is within the SDL along the sea front. No persuasive evidence was presented relating to the need for further land to be zoned for housing in the settlement.
- 3.10.19 Objection 5186 is to the exclusion of the **Salmon Green** and argues that this land should be designated for housing. This land is to the north headland of the settlement and is constrained both physically and environmentally. It is within the North Antrim Coast ASI and the proposed PEL02 Bay LLPA, where there is a presumption against development in the interests of protecting the sensitive coastline. Notwithstanding that Planning permission (C/2006/1144/F) has been granted for the redevelopment of the Listed Ice House and the improvement of Salmon Cottage, we are not persuaded that the objection site should be included in the SDL.
- 3.10.20 Objection 5189 seeks the inclusion of land at **Seaport Avenue, Bayhead, Beach Road and the sea** to be consistent with the land included within the SDL of the NEAP. As noted in Section 1 of our report the inclusion of land within the NEAP is not justification for its inclusion within the SDL in this Plan. No evidence was presented to substantiate this objection.
- 3.10.21 Objection 5287 seeks the inclusion of land at **Meadowparks** for housing. The objection site relates to some 2.9 hectares of land to the south west of the settlement. Whilst the land is generally flat it is highly visible when

approaching the settlement from Bushmills. The site would appear as a significant expansion to the settlement. There is no need for the inclusion of a site of this size and scale in the settlement.

HOUSING ZONINGS

- 3.10.22 The main issues relate to the zoning of housing land.
- 3.10.23 Objection 4541 seeks that the title of Housing Zoning **PEH02 at 19 Bayhead Road is amended to read as 17 Bayhead Road**. This site is now developed and therefore we are satisfied that that the address does not need to be as specific.
- 3.10.24 Objections 331 to Housing Zonings **PEH07 47 Beach Road** and **PEH10 Darkfort Drive** on the basis that KSR states that development on the site may require additional land to provide access is unfounded. Residential development has taken place on these sites.
- 3.10.25 Objection 4386 relates to seven housing zonings with a capacity of 66 dwellings, but the objector failed to provide any supporting evidence to explain his reasoning for objecting is to these sites. Objection 5597 also objects to seven housing zoning and lists them as **PEH07 – PEH13** on the grounds that these zonings disregard the problems faced by the village. The objection was not substantiated with sufficient evidence that would warrant de zoning any of the identified housing zonings. Objections 4386, 4551, 4552, 4553 and 5597 were also to Housing Zonings **PEH07 – PEH013** based on the omission of reference to required developer contributions for the construction of WwTW and to the settlement exceeding its capacity. NI water consultation response stated that the settlement is served by Bushmills WwTW and it is deemed as having additional capacity. The Department have stated there is no recognised need to upgrade the current WwTW. If there is a need for certain supplementary infrastructural works to facilitate development the developer should bear the costs to facilitate their development. The objections were not explained any further or substantiated with evidence to justify any amendment to wording of these housing zones.
- 3.10.26 Objection 331 to Housing Zoning **PEH08 Coastguard Road** is on the basis that KSR 2 requires that additional land may be needed to provide access to the site. The site is bounded to the north and north east by public roads where direct access can be obtained for housing on the site. The objection was not substantiated with any evidence.
- 3.10.27 Objection 331 to Housing Zoning **PEH09 Rear of Former Beach Hotel** on the basis that KSR2 requires that additional land may be needed to provide access to the site. The site has partially been developed for residential use. The objection was not substantiated with any evidence to warrant the removal of this housing zone.
- 3.10.28 Objection 265 to Housing Zoning **PEH09 Rear of Former Beach Hotel** on the basis that this is the least sustainable option and that more housing should be located closer to Bushmills. The objection suggests that Meadow Park or Bushmills Caravan Park would be a preferable option. The objector

indicates that housing in Portballintrae should be allocated to Bushmills or at least at the Bushmills side of the settlement. The objector did not identify any specific sites for housing. The use of caravan parks for housing would result in the loss of a tourism resource in the settlements it is therefore not a reasonable option to meet the housing allocation for the settlement. We do not consider that Housing Zoning PEH09 should be relocated in Portballintrae or indeed to Bushmills. The housing zoning is partially developed with a car park to the rear and a small open space within the zoning. The adjacent open space protected by the Plan satisfactorily serves this area. The objector provided no evidence to suggest who should maintain and look after the open space within the housing zoning. Access is in place to service the housing zoning. The existing Beach front apartment development on the site is in keeping with the surrounding context we are not persuaded that it is inappropriate at this location. Regional policy set out in PPS7 and its addendum will mean that the remaining part of the zoning should be in keeping with the surrounding character of this area.

- 3.10.29 Objections 4386 & 5597 to Housing Zoning **PEH09 Rear of Former Beach Hotel** on the basis that this is the zoning of amenity lands. This site is partially developed and sits within the context of an area of open space recognised by the Plan. The objection was not substantiated any further to warrant the removal of this housing zoning. Objection 5192 to the KSR of this Housing Zoning were not explained or substantiated.
- 3.10.30 Objections 331 to Housing Zoning **PEH11 83 Ballaghmore Road, PEH12 40 Ballymore Road** and **PEH13 adjacent to 47 Bayhead Road** on the basis that the key design requirements are too restrictive. The objections were not substantiated and are not sustained.

AREAS OF APARTMENT DEVELOPMENT

- 3.10.31 Objections were received to Designation PEA01 Area of Opportunity for Apartments. This designation has been presented on Map 3/10 Portballintrae. Policy relating to this designation was set out in Plan Strategy and Framework under Policy HOU3 Apartment Development in Settlement with Pressure for Second Homes.
- 3.10.32 Section 1 of our report on the Plan Strategy and Framework recommends deletion of Policy HOU3. As we do not support the use of this policy in the Plan we also consider that the Designations relating to this policy should also be deleted from the District Proposals in the Plan.

Recommendations

- 3.10.33 **We recommend:**
- **That Designation PEA01 Area of Opportunity for Apartment Development is deleted from the Plan.**

LOCAL LANDSCAPE POLICY AREAS (LLPA) & OTHER DESIGNATIONS

- 3.10.34 The main issues relate to the designation of LLPA and failure of the Plan to identify other designations.
- 3.10.35 Objections 331 to designations **PEL01 Bushfoot LLPA, PEL02 Bay LLPA and PEL03 Dunluce LLPA** and questions the basis of the need for the additional designations in this area. The LLPA have been identified to protect the setting and key landscape features in these areas. The objector provided no evidence to question the importance of the identified landscape features of these areas. Since the publication of the Plan Green Belt designations have been removed from the countryside. Accordingly the objections are not sustained.
- 3.10.36 Objection 5186 is to the restrictions set out in Designation **PEL01 Bushfoot**. However the objector's submission confirmed that the LLPA designation would have limited impact on their objection site. Without any persuasive evidence we have no justification for amending this proposed designation.
- 3.10.37 Objection 5192, to the restrictive policy context of Designation **PEL02 Bay LLPA**, was unsubstantiated.
- 3.10.38 Objections 331 to new policy designations on land along **Beach Road, land along the Coastline, land around Ballintrae Park, land around Lisnaduff Avenue and land adjacent to Causeway View** were not substantiated.
- 3.10.39 Objection 4867 seeks the exclusion of a small portion of land at **Bayhead Road and west of Seaport Avenue** from the Designation **PEL03 Dunluce LLPA**. The objector provided no evidence to substantiate the exclusion of this land from the LLPA.

Other Designations

- 3.10.40 Objections 4386, 4551, 4552, 4553, 4644 and 5597 are to the omission of the scheduled Archaeological Monument at the **Ice house** from Map 3/10 in the Plan. To inform the public this should be shown on the Plan. The Department have also accepted this. We recommend that the Ice House should be shown on Map 3/10.
- 3.10.41 Objections 4389 to 4404 relate to the failure of the Plan to identify an area included within Designation **PEL02 Bay LLPA** (between PEH13 and PEH02) as an **Area of Village Character**. The objections were not accompanied by a map to indicate the exact AVC for the settlement or any information relating to the key features that such a designation would protect. In response to these objections the Department presented a proposed AVC in the area around Beach Park, including an insertion to the Plan. We support the inclusion of this AVC and associated text as shown on appendix 5 of the Department's submission

Recommendations:

3.10.45 **We recommend:**

- **That the Scheduled Archaeological Monument at The Ice House should be shown on the Map 3/10.**
- **The Designation of the Area of Village Character as set out by the Department in their submission to Topic C74 (appendix 5).**

3.11 SMALL SETTLEMENTS

- 3.11.1 The draft Plan designates 11 new small settlements in Coleraine Borough (Designation SET1) in recognition of several basic facilities to serve their local community. As previously emphasised within the strategic section of our report, we consider that any further development in the small settlements should be confined to urban form arguments or other factors that would justify an exception being made. Consideration of the small settlements has been set out in alphabetical order below:

BALLYRASHANE

- 3.11.2 In a two dimensional plan form objection site 329 along **Creamery Road**, would infill development in this area. However, the objection site relates to an elevated 5.7 hectare piece of land. The inclusion of this site would therefore dominate and appear out of scale with the character of the proposed settlement. Planning permission (C/2011/0131/F) was granted in August 2011 for an anaerobic digestion bio-gas facility, involving a medium pressure gas pipeline running through the middle of this site. Such development would present constraints to the compatibility of developing the site for other uses.
- 3.11.3 Objection 331 and 5722 relate to the proposed SDL for Ballyrashane. Neither of these objections was supported by a map or reference relating to any specific land or site. Whilst no map was provided objection 4386 refers to the inclusion of **Ballyrashane Reservoir and surrounding land**. This objection has been also unsubstantiated. We do not recommend any changes to the SDL arising from these objections.

BALLYTOBER

- 3.11.4 Objections 262 and 5120 relate to the same site located along **Ballytober Road**. The site is some 3.39 hectares and comprises a large flat open field, part of which lies immediately behind the row of existing 2 storey semi detached dwellings along this Ballytober Road. The lack of maturely defined boundaries means that development on this site would be visually prominent. The Department noted that the site also has road safety and flooding constraints for development on the site. The inclusion of this land within the SDL would result in development out of character with the size, scale and character of the settlement. It would also expand the linear form of the settlement along Ballytober Road resulting in further urban sprawl at this location.
- 3.11.5 Objection 331 and 5722 relate to the proposed SDL for Ballytober, neither of these objections was supported by a map or reference relating to any specific land or site. We cannot consider this objection further.
- 3.11.6 Objection 349 covers two extensive areas of land to the north and south of **Priestland Road**. The land to the south is adjacent to the primary school and extends well beyond the existing physical scale of development in this area which is mainly defined by roadside development. The inclusion of this land would be inappropriate in terms of scale and size and its impact on the

character of the settlement. The portion of the objection site to the north of Priestland land is even more extensive in size and scale, its inclusion would also be inappropriate as it would substantially alter the physical size and character of the settlement. Neither of these areas of land could be considered as a natural extension that would round off this settlement.

BOLERAN

- 3.11.7 Objection site 356 relates to three separate fields **behind St Columba's Primary School**. Collectively these three fields provide a physical break in development along Mayboy Road. Any development either individually or cumulatively would result in the linear expansion of the settlement along Mayboy Road. As such this would fail to present a compact urban form at this location, especially when added to the development that already exists beyond the settlement limit at Tobartree Crescent.
- 3.11.8 Objection site 5156 also covers the above site (356), except for the area of land which fronts onto and is **adjacent to 75 Boleran Road**. The inclusion of this site would be inappropriate as it would substantially extend the settlement in a linear form along Boleran Road. As such its inclusion would not present a compact urban form at this location.

BOVEEDY

- 3.11.9 Objections 6 and 329 both relate to the inclusion of land **north of Boveedy Terrace** within the SDL. Objection site 6 relates to a larger area of land and includes the same site as objection 329. Together this land comprises relatively flat roadside field defined by a low roadside hedge. The remaining rear and side boundaries of land are poorly defined. Edenbane Road is the main road from Kilrea to Garvagh and runs to the north east of this objection site. Development of any type on this land would be visually dominant from the Blackrock Road and the Edenbane Road. Objection 329 also requests that the land could be used to provide for a need for more houses in this area, but no evidence was presented to substantiate such a need for this area. Whist development along the Blackrock Road frontage could reflect the existing pattern of development at Boveedy Terrace; such development would also substantially increase the scale and character of the settlement at this location. This would mean the settlement would have a greater visual impact when viewed from the Blackrock Road and Edenbane Road. The inclusion of either objection site would result in unnecessary urban sprawl at this location.
- 3.11.10 Objection site 4709 to the north west part of **Blackrock Road** is on a gentle bend along this road. Its location on this bend combined with the narrow agricultural lane to the south boundary of the site provides physical features that contain the settlement at this location. The inclusion of this site would further extend the linear development and would give rise to further urban sprawl.
- 3.11.11 Objection 5002 relates to three large portions of land to the south of the settlement fronting onto **Boveedy Road**. The objection requests the inclusion of this land within the SDL. Given the size and scale of objection site its

inclusion within the SDL would almost double the size of the settlement. Roads Service stated that the roads at this location are substandard and therefore this land should not be zoned for development. The inclusion of any of this land would be inappropriate. We therefore consider it should remain outside the SDL.

CLAREHILL

- 3.11.20 Objection 331 and 5722 relate to the proposed SDL for Clarehill, neither of these objections was supported by a map or reference relating to any specific land or site.
- 3.11.21 Objection 331 also raises concerns with the widespread extent of designation of CIL01 Lizard LLPA and CIL02 Ballydevit LLPA, but no information or maps were provided to demonstrate to what extent these LLPA's should be reduced. We cannot consider this objection further.
- 3.11.22 The inclusion of objection site 4986 at the **junction of Moneybrannon Road and Rusky Park** would almost double the size of the existing housing development at Clarehill Park. Notwithstanding the neighbouring housing development, further development of this scale would tip the balance in terms of the character and size of this settlement. The inclusion of this site would therefore result in an unnecessary urban expansion to the small settlement.

CRAIGAVOLE

- 3.11.18 Objection 4986 relates to land at **Grove Road opposite St Mary's RC Church**. The Department have acknowledged the merits of this site in terms of urban form. The site is some 0.6 hectares which would have limited potential in terms of housing yield. The trees along the northern and southern boundaries should be retained and protected where possible, as they provide an important backdrop to the setting of Craigavole and the neighbouring church which is a Listed Building. Roads Service advised that vertical alignment of the road is a constraint to the site. This issue would need to be addressed as part of any development proposal. The inclusion of this site with a limited housing yield would be in keeping with character and scale of Craigavole maintaining a compact urban form. Given the Department's willingness to concede this objection site we support its inclusion within the SDL.

Recommendations:

- 3.11.19 **We recommend:**
- **The inclusion of objection site (4986) at Grove Road opposite St Mary's RC Church within the SDL for Craigavole.**

DRUMGARNER

- 3.11.23 Objection 331 and 5722 relate to the proposed SDL for Drumgarner. As neither of these objections were supported by a map or reference relating to any specific land or site we cannot consider this objection further.
- 3.11.24 Inclusion of objection site 4986 at **Drumgarner Road** would be inappropriate given its size and physical separation from the settlement along the north west side of the road. Whilst a road side footpath is located along the front of the site, the intervening lands between the settlement and the site are not the subject of the objection. The site would therefore sit in isolation of other development along this part of the road. According this would not result in a compact urban form.

GLENKEEN

- 3.11.25 Objection 331 and 5722 relate the proposed SDL for Glenkeen. As neither of these objections were supported by a map or reference relating to any specific land or site we cannot consider these objections further.
- 3.11.26 Objection site 4986 relates to land along **Glenkeen Road** which is already within the proposed SDL and has already been developed for housing.

GLENULLIN

- 3.11.27 At the EIP objection site 286 was further refined to **Area A south of 28 Glen Road; Area B land opposite 23 & 27 Glen Road; and Area C land to the south west of Brockaghboy Terrace**. We support the Department's view that Area C if included within the SDL would represent a significant increase to the scale and size of the settlement. Its inclusion within the SDL would not be justified. We support its exclusion from the SDL of Glenullin. Planning permission (C/2011/0416/F) has been granted on the land immediately south of Area A and B for a 3G playing pitch. This permission overlaps Area A. The objector stated that funding is in place and the approved pitches would be developed. Area A relates to a small 0.4 hectares of land which would only yield a small number of residential units if developed for housing. The area if included within the SDL would make a logical rounding off, tucked behind road side development to the north along Glen Road and set in the context of the approved playing pitches to the south. The inclusion of this small portion of land would have limited impact on the scale, size and housing allocation for the settlement. We therefore support the inclusion of Area A within the SDL for Glenullin. Area B is slightly larger than Area A and shares road frontage along Glen Road. If Area B were included within the SDL it would result in the extension of linear development along the south side of Glen Road. Both individually and collectively with Site A the inclusion of Site B would extend give rise to further urban sprawl to the south side of the Glen Road Accordingly the land within Area B should remain outside the SDL for Glenullin.
- 3.11.28 Objection site 329 and part of 5041 relates to land **opposite St Joseph's Primary School**. Objection 329 consists of land along the front portion of three fields, and part of objection 5041 overlaps the most westerly field of

objection 329. All of this land falls within the proposed LLPA. The land abuts the proposed SDL on three sides to the north, east and west; however the land lacks enclosure to the rear southern boundary in at least two of the fields, inclusive of objection site 5041. Notwithstanding the small group of buildings to the west of the site, the mature road side boundary along this part of the road provides an important buffer to the edge of the higher density development within the settlement. Development on this land would result in the loss of this road side boundary and would increase the linear expansion of settlement to the west, which would be visually dominant on approach to the settlement.

- 3.11.29 Objections 331 & 4386 relate to the proposed SDL and request that additional land should be included within Glenullin. Since neither of these objections was supported by a map or reference to any specific land or site we cannot consider this objection further.
- 3.11.30 Glenview is a privately owned housing development to the north of the settlement. Whilst the road infrastructure is in place a number of potential housing development opportunities remain in this development site that fall within the proposed SDL. Objection site 5000 seeks the inclusion of more land **north of Glenview**, which would result in a linear expansion to the north of the settlement into the countryside. This would be visible when approaching the settlement along the Brockagh Road. The inclusion of this land would fail to provide a compact urban form at this location.
- 3.11.31 Objection site 5041 relates to land north of **Glen Road**. This land is covered by an area of significant trees, which provide a buffer to the setting of the settlement. The Plan has recognised the importance of this buffer with the site falling within the LLPA designation GUL01. Development on this land would result in further linear expansion of the settlement to the west and would cause the loss of vegetation on the site. The objection also related to the LLPA designation GUL01; however no evidence was presented to substantiate this objection. This land should not be included within the SDL.
- 3.11.32 Objection site 5601, on land to the **west side of Brockagh Road**, is located opposite existing housing development at Glenview and is close to the nearby resource centre and primary school. However, the Brockagh Road at this location provides an important physical boundary to the western edge of Glenullin. We have received no evidence to an objection to the inclusion of the neighbouring land within the SDL regardless of the fact that the land owner may live in the Arizona USA. The inclusion of this site would represent a significant urban expansion to the settlement at this location and would breach the physical boundary to the edge of the settlement
- 3.11.33 Objection 5751 requests that an “additional LLPA should be designated at Glenullin to preserve the integrity of the Glen itself and the context for the proposed peat land and woodland SLNCI’s 3/27 and 3/28”. This objection was not further substantiated and no maps were provided to illustrate the extent of another LLPA in this area. The Glenullin Glen is not adjacent to the settlement and does not fall under the same pressure from development as land immediately outside the SDL. The proposed SLNCI designation will

afford protection for the peat land and woodland in this area. We are satisfied that there is no need for another LLPA designation.

Recommendations

3.11.34 We recommend:

- **The inclusion of objection 286 (Area A) as shown on the objector submitted map DR.01.**

MONEYDIG

- 3.11.35 Objection 331 refers to lands to be included within the SDL, but as it was not supported by a map or reference relating to any specific land or site we cannot give it further consideration.
- 3.11.36 Inclusion of objection site 353 situated to the **West of 55 Moneydig Road** would result in a substantial urban expansion to the west of the settlement. Development on this site would significantly protrude beyond the existing defined visual and physical boundaries of the settlement. The scale of the site would therefore not round off development at this location or present a natural extension to the west.
- 3.11.37 Objection 4707 situated to the **west of 147 Carrowreagh Road** is a small road side site, defined by a mature hedge and tree boundary to the west. Whilst the scale and size of the site would be akin to character of the settlement, its inclusion would result in further linear sprawl along this part of the Carrowreagh Road and is therefore unacceptable.
- 3.11.38 Land to the rear of **Moneydig Park** relate to objection sites 4986 and 5003 both of which could easily link into the development at Moneydig Park. NIEA have stated that the southern portion of this land (5003) comprises of a mosaic of scrub, woodland and wetland providing a valuable habitat where development should be avoided. This area of land is also adjacent to the pond area, which has been purposely left out of the SDL. Access to the remaining part of this land (4986) can be achieved via the dead end road that leads to the edge of the settlements west boundary through Moneydig Park. Roads Service stated that this access is only 4.1 metres wide. The width of this road would therefore limit development on this site. No evidence was presented to substantiate how or if the road could be improved to provide an appropriate standard of access to service the site. Given the lack of evidence supporting a need to expand the settlement and constraints to development as highlighted by the Department, it would not be appropriate to include this land within the SDL.
- 3.11.39 Objection site 5735 on land adjacent to **77 Moneydig Road** relates to a small roadside site within neighbouring road side development. It is located some 230 metres beyond the southern edge of the proposed SDL. The inclusion of this site would be inappropriate, given the physical separation from the settlement and that intervening lands are not the subject of objection.

RINGSEND

- 3.11.40 Objection 331 relates to the proposed SDL of Ringsend, this objection was not supported by a map or reference relating to any specific land or site.
- 3.11.41 Objections 4520, 4522 and 4523 all relate to the same area of land located to the north (Site A) and south (Site B) of the junction of **Boleran Road with Shanlongford Road**. The land is flat with low lying hedge boundaries. Development on this land would be visible from the Boleran Road and the other higher up locations within Ringsend. The Aghadowey River physically separates this area of land from the proposed SDL. The river as such provides an appropriate physical edge to the SDL at this part of Ringsend. The inclusion of Site A or Site B, within the SDL either individually or cumulatively would breach this physical boundary. The overall size and scale of the each site either individually or cumulatively would be out of keeping with the size and character of Ringsend. Whilst planning permission was granted (C/1974/0054) for a housing development on part of Site A, it has lapsed long ago and is not a reason now to include this area of land within the SDL. The land is distinguishable in terms of urban form from Bradleys Builders yard given its location to the south of Aghadowey River. The inclusion of Site B of itself would be inappropriate as it physically separated from the existing urban form. The inclusion both Site A and Site B individually or cumulatively would also be inappropriate, given its size, location and physical separation from the settlement and if included would result in unnecessary urban sprawl to the south of the settlement.
- 3.11.42 Objection 4989 relates to seven separate areas of land around the edge of the proposed SDL for Ringsend. The agent has numbered each site 1-7. Consideration is as follows:
- Site 1 - land **west of the junction at Craigmore Road and Boleran Road**, is constrained substantially by the fluvial floodplain of the Aghadowey River. Whilst the remaining part of the site could have development potential, a reduced site to reflect this area would be difficult to define, given the flooding constraints of the site. This combined with required road infrastructural improvements it would be inappropriate to include this land for any type of development within the SDL.
 - Site 2 – land **northwest of Craigmore Road**, provides a visual buffer to the existing dense pattern of development along the upper part of Craigmore Road. The land is triangular in shape and is bounded on all sides by roads. The inclusion of this land would result in an elongated area of land resulting in further urban sprawl to the west of Ringsend.
 - Site 3 – land **north of Craigmore Road (lower)** comprises a small rectangular portion of land. The land it is surrounded by development to the north, south and east. Development on this land would sit easily into the existing urban form at Ringsend, and would allow for flexibility for the surrounding commercial businesses in this area, or a small group of houses if necessary. Access to the site should be taken onto the main Craigmore Road, as the width Craigmore Road (upper) would be restrictive for any new development. This land is within close

proximity of the waste water treatment works and therefore any development proposal on this site would be subject to an odour assessment as recommended by NI water. We accept that the inclusion of this land would not impact on the scale, size and character of this small settlement and would present a logical rounding off to the settlement.

- Site 4 – land **east of junction of Craigmore and Boleran Road**, relates to a large site beyond the proposed SDL. Development on this land would be visually prominent from approaches to the settlement along Craigmore Road and Boleran Road. The Aghadowey River runs along the sites southern boundary which would restrict development on this part of the site. Given the sites location divorced from the settlement and its size, the inclusion of this land would be inappropriate within the SDL of Ringsend.
- Site 5 – land to **rear of Craigmore Terrace**, relates to elevated land to the north of the existing terrace of development, which is visually prominent from both Shanlongford Road and Boleran Road. This inclusion of this site would result in linear urban extension excessive in size relative to the existing settlement. Development on this site would have a detrimental effect on the existing trees in this area, which provide a valuable back drop to the settlement at this location.
- Site 6 – land to **rear of 95-101 Craigmore Road**, relates to elevated portion of land adjacent to Site 5. The scale and size of this site is not in keeping with the scale of the settlement. Its inclusion would double the size of the settlement. It would be inappropriate to include this land given its scale and location relative to the settlement of Ringsend.
- Site 7 – land to **west of 101 Craigmore Road**, relates to land adjacent to Site 6, it is also elevated above the settlement. Its inclusion would result in significant urban sprawl to the west of the settlement. The appearance of which would be visually prominent and would detract from the creation of a compact urban form.

Recommendations:

3.11.43 We recommend:

- **the inclusion of objection site (4989) in respect of land titled Site 3 north of Craigmore Road (lower) within the SDL for Ringsend.**

3.12 COUNTRYSIDE AND COAST

3.12.1 The main issues raised by the objections to the Countryside and Coast areas in the Coleraine include:

- (a) Land in the countryside should be identified as a Small Settlement;
- (b) Land identified as an Area of International and National Conservation Interest;
- (c) Designation of Sites of Local Nature Conservation Importance (SLNCI);
- (d) Designation of Areas of Constraint on Mineral Development; and
- (e) Designation of Historic Parks, Gardens and Demesnes.

Land in the Countryside should be identified as a Small Settlement

3.12.2 Objections 276 and 5123 seek that **Craigahullier** is identified as a small settlement in the Plan. The designation of Craigahullier as a small settlement was considered in paragraph 1.3.28 of the strategy where we concluded that the area should not be designated as a small settlement. The arguments and evidence presented at site specific stage does not result in different conclusion in respect of the designation of Craigahullier as a small settlement in the Plan area.

3.12.3 Objection 333 relates to the failure of the Plan to designate **Drumadragh** as a small settlement in the Plan. The area referred to is located north east of Coleraine and relates to a group of houses immediately north of Cloyfin Road. The designation of Drumadragh as a small settlement was considered in paragraph 1.3.27 of the strategy where we concluded that the area should not be designated as a small settlement. The arguments and evidence presented at site specific stage does not result in different conclusion in respect of the designation of Drumadragh as a small settlement in the Plan area.

3.12.4 Objection 4648 relates to the failure of the Plan to designate **Formoyle** as a settlement in the Plan. The Department provided the objector with the opportunity to provide an accurate map and details of the proposed settlement. However the objector provided limited information in terms of the identification of the location, area or a proposed settlement boundary. We are therefore not persuaded by the objection that this area should warrant the designation of a settlement.

3.12.5 Objection 4979 seeks that land at **Ballymadigan Road and Mussenden Road, Castlerock** is identified as a settlement. This area is to the south side of Musseden Road in the vicinity of Castlerock and Articlave. The designation of Ballymadigan Road as a small settlement was considered in paragraph 1.3.25 of Section 1 of our report where we concluded that the area should not be designated as a small settlement. The arguments and evidence presented at site specific stage did not result in different conclusion in respect of the designation of Ballymadigan Road as a small settlement in the Plan area.

3.12.6 Objections 4984 and 5481 were made to the failure of the Plan to designate **The Loughan** (also referred to as the Mill Loughan or Fish Loughan) as a small settlement. The area referred to by the objection is located some 1.5

km south east of Coleraine at the junction of Damhead Road and Loughan Road. In paragraph 1.3.30 of Section 1 of our report we concluded that 'The Loughan' should be designated as a small settlement in Coleraine. Objection 5481 provided a map, which indicated an excessive area of land, not in keeping with the scale of a small settlement. Objection 4984 provided a map (MKA Map1) illustrating the extent of the SDL along Loughan Road extending from 1 Loughan Road to the farm group to the east side of the Loughan Road and along Damhead Road to the row of houses. We support the Department's view that the row of houses along Damhead Road are physically and visually separate from the concentration of development along Loughan Road and do not form part of the entity of the proposed settlement. The existence of two planning applications does not close this visual gap between the development along Loughan Road and Damhead Road. We therefore recommend that the SDL should be drawn around the roadside frontage along Loughan Road as indicated by the objector 4984 map, with exception to the extension of the proposed SDL along Damhead Road. We agree that this proposed SDL still allows scope and flexibility within the proposed settlement.

3.12.7 Objection 5724 seeks the designation of **Bellany Road** as a small settlement in the Plan. The area referred to is north west of Coleraine and comprises a group of around 10 houses located along Bellany Road. These houses are not supported by any services or facilities that would warrant the designation of a small settlement at this location. The designation of Bellany Road as a small settlement was considered in paragraph 1.3.29 of the strategy where we concluded that the area should not be designated as a small settlement. The arguments and evidence presented at site specific stage did not result in different conclusion in respect of the designation of Bellany Road as a small settlement in the Plan area.

3.12.8 Objection 5740 relates to a social housing need for 2 residential units at **Craigahullier**. This area was designated as a settlement in the Plan. The social housing needs for this area can be met under the provisions of PPS21.

Recommendations

3.12.9 **We recommend:**

- **The SDL for The Loughan should be drawn around the roadside frontage development along Loughan Road as indicated by objection 4984 MKA Map 1, with exception to the extension of the proposed SDL along Damhead Road.**

Land should be identified as an Area of International and National Conservation Interest

3.12.10 Objections 4578 and 4580 seek that the **Movanagher Area along the River Bann** should be designated as an ASSI. The objections were not substantiated with persuasive evidence to demonstrate why this area should be designated as and ASSI. In any case it is not the role of the Plan to designate ASSI, they are shown for information purposes only.

Designation of Site of Local Nature Conservation Importance (SCLNI)

- 3.12.11 Objections 331 to **Designations CSLNCI01 – CSLNC45** were not substantiated with evidence to justify any objection to the designation.
- 3.12.12 Objection 331 to new designations on land beside **Moneygran Road** were not explained or substantiated with supporting evidence to justify the objection.
- 3.12.13 Objection 331 to any new designations on land at **Somerset Forest** were not explained or substantiated with supporting evidence to justify the objection.
- 3.12.14 Objections 4383 and 5649 seek that land identified on Maps 3/42 and 3/60 owned by Coleraine Borough Council and managed by the National Trust, to **the north east of Downhill Historic Park, Garden and Demesne and to the west of the caravan park** should be designated as a SLNCI. Neither objector provided a map indicating the area. Whilst the objectors claimed that this area was of considerable biodiversity and has local conservation interest, the objector did not substantiate this with any persuasive evidence. Given this lack of information means that on this occasion this objection cannot be considered any further.
- 3.12.15 Objection 4563 relates to **Designation CSLN43 Sandleford** within Housing Zoning CEH56. This area relates to a small area of marshy grassland and associated vegetation. The objector provided no evidence to state that this area was not worthy of the proposed designation. Accordingly the designation should remain in the Plan.
- 3.12.16 Objection 4566 to Designation **CSLN33 Kilrea Dam** part of a site at **Millbrook, 30 Pond Park, Mill Road, Kilrea**. This designation contains a water body and associated wetland habitats, vegetation and woodland fringe which have a local nature conservation importance. The objector provided no evidence to state why this part of the SLNCI should be removed from the objection site. Accordingly the objection should remain in the Plan.
- 3.12.17 Objection 4638 is to the failure of the Plan to designate **Black Glen at Downhill Road** as a SLNCI. The site identified is immediately east of Downhill and is located within Downhill Historic Park, Garden and Demesne as illustrated on Map 3/60. The objector did not provide any evidence to demonstrate why a further designation is necessary on this land.
- 3.12.18 Objection 4718 seeks land at **Station Road, Portstewart** to be removed from **Designation CSLN16 Cromore Marsh**. The area indicated on the map relates to the entire designation at Cromore Marsh. The justification for the objection relates to the cottage industries at Cromore Station and that this designation would affect the tourism potential at this location. The site has been designated on the basis of a good sized reed bed and sedge rich marsh, which is maintained by small stream that runs to the north eastern edge of the site and a ditch to the southwest. The objector provided no persuasive evidence to justify removing the designation at this location.

- 3.12.19 Objections 4808 & 4881 are to **Designation CSLN01 Agivey Bridge SLNCI** on the basis that this designation is too large, is based on inadequate research and would restrict the development potential in this area. The SLNCI has been presented on the basis of information contained in a report on conservation of diatomite prepared by the University of Ulster. The report has identified the area for its diatomite and related sedimentary deposits. The Department considers that this area is worthy of protection in an appropriate manner and confirm that recent site visits undertaken by NIEA indicate that the area contributes, to and retains, the nature conservation interests that were present when the site was proposed as a SLNCI. The objector provided no evidence to contradict these more up to date site visits; accordingly we accept the area should be retained as a SLNCI in the Plan.
- 3.12.20 Objection 4969 is to the inclusion of land at **25-35 Mountsandel Road** within **Designation CSLN43 Sandelford Bridge SLNCI**. The objector stated that this land was no different from the land along the riverside outside of the proposed designation and that the Housing Zoning CEH56 was also within a SLNCI. At the EIP Natural Heritage had looked at this area again and stated that species and habitat composition within the designation was different from that in the area outside of the proposed designation. The site was species rich with Green Figwort, which is uncommon with records only identifying at present in three locations in Northern Ireland. Supporting evidence was presented to demonstrate this. Natural Heritage stated that Green Figwort is a threatened species and that development in this area would impact on the biodiversity of the area which could impact on the key features of this designation. This evidence was not disputed. We are satisfied that the designation of the SLNCI to the north side of the Mountsandel Bridge within Housing Zoning CEH56 has a different character than that relating to the objection site. Accordingly removing the designation from the objection site or part of the objection would be inappropriate as it would threaten the key conservation features of this designation. The designation should remain as shown in the draft Plan.
- 3.12.21 Objection 5502 is to the inclusion of land at **Castleroe Road** within **Designation CSLN44 Somerset Ponds**. The area has been designated on the basis of an area of damp woodland. The objector stated that there is no requirement for this land to be designated as a SLNCI as the conservation interest can be protected through the development management process. This has been already been accepted by the Departments withdrawal of the conservation reason for refusals (4-6) of planning decision C/2005/0118 at appeal A/2006/A0690. This application had been accompanied with an Environment Statement which illustrated how the site could be sensitively developed. Furthermore the objector stated that the majority of the land relating to the ponds has now been gifted to a local school for education purposes. At the EIP Natural Heritage stated that the loss of the objection site from the SLNCI would reduce the habitat mosaic within this SLNCI. This was not disputed by the objector but was seen to be a further unnecessary hurdle to any development on this land. The area is noted to be rich in habitat range and species, the designation provides a necessary means of informing the public about the importance of this area. Accordingly we are not persuaded that the site should be removed from Designation CSLN40 Somerset Ponds SLNCI.

- 3.12.22 Objection 5723 seeks the removal of the proposed SLNCI as shown on Map 3/24 which relates to **CSLN012 Colebreene Wood**. The objector provides a map identify an area outside of the designation. This SLNCI contains habitats of local nature conservation importance including mixed broad leaf woodland that supports a variety of trees species and rich herb layer and an area of semi improved grassland. No persuasive evidence was presented to justify the removal of these designations from the Plan.
- 3.12.23 Objection 5751 seeks the extension of Designation **CSLN45 The Rough Hills at Kilrea** to include additional areas of raised bogs vegetation that lies within the golf course. The Department have accepted that this designation should be extended to the area which is considered to form part of Kilrea Golf Course, as this area includes raised bog areas not surveyed at the time of designation. We consider that this area is a logical inclusion within the designation.

Recommendation

3.12.24 **We recommend:**

- **That Designation CSLN45 The Rough Hills should be extended to include Kilrea Golf Course.**

Designation of Areas of Constraint on Mineral Development

- 3.12.25 Objections 331 to Designation BACMD01 (1-19) Areas of Mineral Constraint were not substantiated with any evidence to justify these objections.
- 3.12.26 Objection 367 to land at **Drumbane Road, Garvagh** being within Designation BACMD01, was not supported with persuasive evidence to demonstrate why this land on both sites at Drumbane Road should not be included within the proposed designation.
- 3.12.27 Objection 383 to land **adjacent to 79 Glen Road, Garvagh** being within Designation BACMD01 was not supported with persuasive evidence to demonstrate why this land on both should not be included within the proposed designation.
- 3.12.28 Objection 392 to the inclusion of land along **Craigmore Road, Ringsend** on the basis that this area is too extensive. The objector seeks the removal of land from the designation. Some of the land identified on the map is not within the designation. This area has been identified to safeguard the most valuable and vulnerable areas of the environment from the detrimental effects of mineral extract. The objector's statement that the landowner has no interest in carrying out mineral extract is not sufficient to safeguard the area. The removal of the objection site from the designation would not give rise to a logical edge to the designation as it relates to the geology and geomorphology of this area. Accordingly we are not persuaded this land should be removed from this designation.

Designation of Historic Parks, Gardens and Demesnes.

- 3.12.29 Objection 331 to Designation CHPG Historic Parks and Gardens, **2 Beardville, 5 Wilson Daffodil Garden, 6 Knockarna and 7 Lizard Manor** were not substantiated with evidence to justify the objections to these designations.
- 3.12.30 Objection 5192 to identification of **Cromore Historic Park, Garden and Demesne** on the NIEA supplementary list as shown on Map 3/62 was not supported with any evidence to substantiate the objection.
- 3.12.31 Objection 5220 seeks the exclusion of a small site on the edge of the settlement at **Mountsandel Road** from **Designation CHPG Historic Parks, Gardens and Demesnes**. The Department accepted that this designation should be amended by removing the objection site in accordance with the Department's map in appendix 1 of their submission. Given the recent development on this site we accept this is a logical amendment to the Plan.
- 3.12.32 Objection 5704 to **Designation CHPG Historic Parks, Gardens and Demesne** was unsubstantiated; we therefore cannot consider this objection any further.

Recommendations

- 3.12.33 **We recommend:**
- **The amendment of the boundary Designation CHPG Historic Parks, Gardens and Demesnes – 6 Knockarna to exclude objection site 5220 at Mountsandel Road in accordance with the Departments map as shown in appendix 1 of their submitted evidence.**